



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

OCT 03 1984

AB35-1 OCT 05 1984
J. M. Mulano → Tse
Reg. II

MEMORANDUM FOR: F. Gillespie, Director
Division of Risk Analysis and Operations
Office of Nuclear Regulatory Research

FROM: J. Philip Stohr, Director
Division of Radiation Safety and Safeguards

SUBJECT: PROPOSED RULE ON WELL LOGGING OPERATIONS, 10 CFR 39,
(YOUR MEMO, 9/18/84)

In response to your request for review and/or concurrence on the subject document, we concur but offer additional comments as follows:

General Comments:

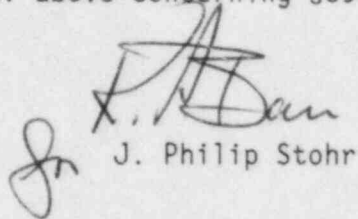
1. This proposed regulation appears to be timely based on recent incidents. Publication for comment in the Federal Register should not be delayed for resolution of minor differences.

Specific Comments:

1. §39.13(b)(5) would require a written or oral test to qualify a logging supervisor. We believe that both written and oral testing should be required to formalize the training and to provide documented verification of the extent of comprehension.
2. §39.15(a) requires that the licensee agree with the well owner or operator concerning §39.15(b). We suggest that (b)(3) require that "all onsite subcontractors must also be subject to these conditions," since the well operator or owner may otherwise have little or no control over certain persons and equipment leaving the drillsite.
3. §39.33(b) implies that a consulting service is not a "second party." Revise to read, "consulting service or other second party."
4. §39.35(d)(1) implies that 10 CFR 20 is sufficient to control decontamination, repair, or disposal of a leaking source. We suggest revision to require that these functions be performed by an authorized NRC or Agreement State licensee in accordance with 10 CFR 20." Many well logging licensees are not qualified to repair leaking sources.
5. §39.45. Add (c) to indicate that subsurface tracer studies in different wells at different times in a single field are considered to be field

flooding studies subject to 10 CFR 30 license conditions rather than 10 CFR 39.

6. §39.61(a)(4). See comment 1. above concerning §39.13(b)(5).


J. Philip Stohr

cc: A. N. Tse, RES