



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AB 35-1

JUL 19 1984

MEMORANDUM FOR: Anthony N. Tse
Transportation and Material Risk Branch
Office of Nuclear Regulatory Research

FROM: Edwin G. Triner, Director
Division of Budget and Analysis
Office of Resource Management

SUBJECT: CAG REVIEW OF PROPOSED NEW RULE 10 CFR 39 ON
WELL-LOGGING OPERATIONS

Attached, as you requested, are the Cost Analysis Group's (CAG's) review comments on your proposed new rule 10 CFR 39 on well-logging operations. If you have any questions regarding these comments, please contact John Clark, of my staff on extension X29868.

Separately from our cost analysis review, we note that in Section 3.1 of the regulatory analysis you state that the current rules applying to well-logging or the "status quo" are "unacceptable". Since the current rules have been in effect for some time you are implying here that NRC's rules regarding well-logging operation have been unacceptable for some years. You make enough points in Sections 3.1 and 3.2 to show that your proposed alternative is superior to the status quo, but we think it might be inappropriate to term these present NRC practices as "unacceptable".

Edwin G. Triner, Director
Division of Budget and Analysis
Office of Resource Management

Attachment:
As stated

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