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BEN N. SALTZMAN, M.D.  
DIRECTOR

*Handwritten:* ~~For file~~  
Holley  
AB 35-1

June 28, 1984

Donald N. Nussbaumer  
Assistant Director for  
State Agreements Program  
Office of State Programs  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Nussbaumer:

The proposed revisions of 10 CFR Part 39 which would specify radiation safety requirements for use of radioactive material in well-logging operations have been reviewed by this Division. As noted in the NRC's supporting document, the proposed regulations represent an expansion of Part W of "Suggested State Regulations". As Arkansas has adopted most of Part W, the Division likewise supports the adoption of the proposed well-logging regulations, although the following observation is presented.

The smaller well-logging firms may not find it financially feasible to obtain sodium iodide crystals or survey meters capable of detecting the higher exposure rate. Also, in many cases, we would have reservations about a well-logging supervisor attempting source recovery or contamination control procedures associated with source recovery. Currently, the performance of procedures such as these is limited by the license to specifically trained individuals and thus allows a well-logging firm to obtain outside assistance with these efforts. Therefore, it is imperative that this option be maintained through, for example, the exemption clause.

The Division appreciates the opportunity to review and comment on the proposed rules.

Sincerely,

*Greta J. Dicus*

Greta J. Dicus, Chief  
Compliance & Emergency Preparedness  
Deputy Director, Division of  
Radiation Control & Emergency Management

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