

## DEPARTMENT OF HEALTH SERVICES

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June 20, 1984

Dr. Anthony N. C. Tse  
Office of Nuclear Regulatory Research  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Doctor Tse:

This responds to your request for comments on the proposed rule: Licenses and Radiation Safety Requirements for Well Logging Operations.

We are pleased to see the prohibition against use of sealed sources in wells without surface casing contained in the proposed rule [Section 39.51]. Some discussion of acceptable alternatives to casing would be useful if the invitation with respect to alternative procedures in the proposed rule remains. Discussion could include such matters as use of short lived and less toxic radioactive materials as well as a determination that casing is not required because there are no potable aquifers to protect.

Notice requirements in the proposed rule [Section 39.77] should include notice to the regulatory agency as fishing is ordered. This notice would permit oversight by field engineers for agencies such as the California Division of Oil and Gas which regulates in this area.

The agreement between the logger and the well owner or operator required by proposed rule [Section 39.15] should include provision for logger control of fishing operations since the fisher is normally retained and paid by the well owner. The point of this provision is logger implementation of the portion of the proposed rule which bars recovery which could result in rupture [Section 39.15(a)(2)].

Sincerely yours,

Don D. Honey  
Supervising Health Physicist  
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