



Shell Mining Company

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JULY 1985
PROPOSED RULE PR-19,20,21 et al (53)
(50 FR 13797)

SUBSIDIARY COMPANIES
R&F COAL COMPANY
TRITON COAL COMPANY
TURRIS COAL COMPANY

July 3, 1985

DOCKETED
USNRC

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Secretary of the Commission
Attention: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Sir:

SUBJECT: PROPOSED RULES PERTAINING TO LICENSES AND RADIATION
SAFETY REQUIREMENTS FOR WELL-LOGGING OPERATIONS
50 FR 13797-13810, APRIL 8, 1985

Shell Mining Company recognizes the need for consistent radiation safety standards; however, we strongly object to the rule proposed at 50 FR 13807 for 10 CFR Part 39, Subpart C, Section 39.51 "Use of a sealed source in well without surface casing". This proposed rule prohibits the use of a sealed source in a well without a surface casing designed to protect fresh water aquifer zones, unless procedures for protecting these zones are specifically approved by the Commission.

Effects of this rule would adversely impact coal and other solid mineral exploration and evaluation and impact the amount of information available concerning geologic conditions necessary for conduct of safe and efficient mining operations.

Our major concerns and comments are as follows:

ECONOMICS

Required casing programs would increase hole costs from three to five times. These increased costs would impact project economics and make coal and other solid minerals less competitive.

RESTRICTS USE AND EFFECTIVENESS OF LOGGING TOOLS

Gamma-Gamma density logs are important lithologic evaluation tools and are particularly essential in the appraisal of the Gulf Coast lignite formations. Radioactive tools play an important role in identifying and evaluating aquifers. Restricting the use of these tools exposes groundwater systems (that the rule intends to protect) to increased hazards by limiting data collection. Even if these logs were run in a cased hole, the quality of the data obtained through the casing is inferior.

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DATA AND INCIDENT RATE DOES NOT JUSTIFY THE EXTREME MEASURE OF PROHIBITING THE USE OF SEALED SOURCES WITHOUT SURFACE CASING

Two field incidents within the one year interval cited in which about 50,000 well-logging operations took place do not warrant the action proposed.

Sealed sources in coal and solid mineral exploration use a solid, non-soluble radioactive element that, in the event of rupture, will not disperse into an aqueous system. Tools utilizing solid, non-soluble licensed material should be exempt from the casing requirement.

RECLAMATION OF CASED HOLES WILL NOT BE AS COMPLETE AS WITH UNCASED HOLES

In the process of coal exploration and evaluation many holes are logged by radioactive methods. If each one of these holes were to be cased and cemented only to protect the aquifer system as this rule would mandate, these holes could never be reclaimed as completely as holes without casing. Further, in the case of eventual mining, these cased holes would represent an expensive problem.

SUMMARY

Shell Mining Company has drilled and logged with licensed materials in excess of 10,000 holes without a lost tool incident. These operations have been conducted in most of the major coal fields in the U.S. Our record is one of safety with regulatory compliance. We feel that the casing requirement approach in this rule making is misdirected and that industry would suffer unjustly. Tools using non-dispersable radioactive elements should be exempt from casing requirements. Other safeguards being proposed are more than sufficient to adequately protect fresh water aquifers.

Thank you for this opportunity to comment.

Sincerely,



N. J. Isto
General Manager - Mining

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