

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

July 7, 1985
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Attn: Docketing and Services Branch

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Sirs:

I am responding out of personal concern (official employer endorsement not sought) to NRC's proposed regulation titled "licenses and radiation safety requirements for well-logging operations". I have been responsible for water-well and test-hole logging for the Alaska Division of Geological and Geophysical Surveys (also called the Alaska Geological Survey and DGGS) for 4 years. Prior to state employment, I operated a radioactive-source logger for the U.S. Geological Survey's Anchorage Water Resources office for about 8 years. Since about 1977, I have been a RPO for both organizations. Also to round-out this perspective, I have personally logged dozens of holes in many different geologic terranes and physical conditions throughout Alaska, without incident.

After reading the proposed rules, I can't determine if research-oriented licensees such as many USGS districts and state hydrologists, like myself, would qualify for an exemption mentioned under "R". I will assume not; and thus comment on several proposed requirements that I feel are needless hassling, or are too restrictive:

- J) Use of sealed source in a well without surface casing --- it is imperative that groundwater researchers be allowed to continue logging open-hole wells tapping bedrock aquifers. I would like to know specifically what procedures you have in mind for operators to follow to protect fresh-water aquifers. I also wonder what circumstances could possibly cause accidental rupturing of a sealed source housed inside the heavy metal of sondes that I use, other than a devastating earthquake causing ground shifting, or careless fishing for a stuck sonde (which I have never had to engage in). If a hole to be logged is drilled through incompetent rock, the caliper log (always run first) tells me that either don't log with radioactive sources, or else first emplace a liner in the hole. If Section J were to specify this common-sense procedure, important data acquisition would not be jeopardized by what I fear would be a requirement for a case-by-case NRC decision.
- K) Training --- I feel that retraining on an annual schedule is ridiculous overkill, and needless hassling. NRC's reason number 1 is an insult to the intelligence of qualified loggers. Reasons 2 and 3 are valid only if new instruction is offered and required every 3 to 5 years.
- P) Documents and records required at field stations and temporary jobsites --- I carry a binder of various papers and forms into the field each time primarily for proper record keeping, and to show anyone who asks that I am operating within NRC regulations. Present rules dictate that about 8 to 10 different types of information be readily accessible. I hope you tightly scrutinize the need for any additions. I question the need to carry more papers when one's office is within 30 minutes drive and a phone is nearby. Also, I think that a distinction between

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field stations and temporary jobsites should be made pertaining to documents and records required to be in the operator's possession. Why would leak test results be required at temporary jobsites, for example?

As requested by the Commission, I will state that your estimated \$2000 a year additional cost to the average well-logging entity is 7 percent of DGGS's 1985 groundwater operating budget, after salaries. With 8 projects to support, a \$2000 bite will hurt by eliminating one of our important water-level recorder sites.

In concluding, I believe that the NRC should be commended for implementing a national radiation safety program that limited the contamination incidents to just 2 in 50000 wells logged over a 1 year period. Furthermore, I believe that no amount of rules that yet permit this number of loggings will reduce the accident rate below the above-cited NRC figures. At some point close to where we are now it's time to say "enough is enough".

Even though I couldn't meet your recommended comment deadline, I hope you will give my comments strong consideration.

Sincerely Yours,


Larry L. Dearborn

Hydrologist-in-charge of the
groundwater program

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