

First Exploration Company



DOCKET NUMBER  
PROPOSED RULE PR-19,20,21 et al  
(58 FR 13797) (65)

Suite 300  
1800 Glenarm Place  
Denver, Colorado 80202  
(303)294-9622

EUGENE C. PENDERY  
PRESIDENT

July 22, 1985

DOCKETED  
USNRC

'85 JUL 24 A10.36

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attn: Docketing and Service Branch

Re: 39.51 Use of a Sealed Source in a Well without a Surface Casing

Dear Sir:

It has been brought to my attention that NRC has proposed new regulations regarding the use of sealed radioactive sources, in particular, a suggested change requiring surface casing to be placed across fresh water aquifers prior to logging.

We find this requirement to be ludicrous in that no study we are aware of has demonstrated any adverse effects on groundwater (be it fresh or salt water) resulting from the use of a sealed radioactive source logging tool.

It is respectfully submitted that the NRC already has more than enough regulations on the books to protect the environment -- please don't add another nonsensical regulation which would affect and inhibit much needed mineral exploration activities in the United States.

Thank you.

Very truly yours,

Eugene C. Pendery  
President

8507290432 850722  
PDR PR  
19 50FR13797 PDR

ECP/cmm

DS10  
add Anthony M. Tse, 113055  
Bruce Carrico, 39655

ACKNOWLEDGED BY CARD JUL 26 1985

pa