



PROPOSED RULE PR-19,20,21 et al
(50 FR 13797) (62)
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BRANCH

RICHARD "RICK" BORGUS
Corporate Safety Manager

July 11, 1985

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

RE: Proposed Part 39 to 10 CFR

Sirs:

In response to the Federal Register Vol. 50, No. 67 concerning the propose Well Logging Section to 10 CFR as referenced above, the following comments are submitted.

1) 39.13 (b) (2) and (d):

We feel that the added knowledge gained through an annual retraining program does not justify the added expense and paper work these two sections would cause. Each time a Logging Supervisor and/or an assistant conducts an operation utilizing radioactive materials, they are establishing their ability to work safely and within regulatory limits. Currently most Well Logging Companies, through their Safety Departments, conduct periodic job site inspections which will verify the operators abilities. The documentation requirement of Section (d) only serves to add to the vast paperwork all ready required.

2) 39.33 (a):

The five (5) year "grandfather" clause is not needed in order to change the detection range of our survey meters. We are currently getting a much longer life out of our survey meters than five (5) years. A much more equitable solution to this range change would be to allow meters that are currently in use be retained indefinitely. The regulation should state that meters obtained after the effective date of the regulation must meet the new requirements.

3) 39.35 (d) (2):

The five (5) day reporting limit is too rigid as in most cases it will take much longer than this to obtain the information required by this section. A thirty (30) day reporting period is much more reasonable.

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add: Anthony M. Tse, 1130 SS
Bruce Carruso, 396 SS

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Approved by card

4) 39.39 (a) ~-

The sentence currently reads "Shall maintain a record showing the following". This implies that all the information required by this section must be put on one (1) form. The information asked for is already available but it is currently on several different forms. We would prefer that this sentence read "Records" indicating that the information may be recorded on more than one (1) form.

5) 39.43 (a):

We would prefer that the requirements of this section spell out that the daily inspection be of visual nature and that no records of the inspection need to be kept.

6) 39.43 (b):

The term sinker bars must be clarified to read "Radioactive Sinker Bars".

7) 39.43 (d):

An exemption to this requirement needs to be included to cover simple operations that will in no way affect the integrity of the source. Operations such as the changing of "O" rings is an example of the exempted operations we have in mind.

8) 39.43 (e):

Logging tools should be removed from this section since by their construction a logging tool could be disassembled through cutting or drilling without endangering the integrity of the source. Some latitude must be left with industry in the handling of our tools.

9) 39.45 (b):

Add the word "knowingly" between the words "not" and "inject". The sentence should read "A license may not knowingly inject licensed material into fresh water aquifers".

10) 39.61 (a) (1)

In order to cover thoroughly the items specified for formal training as well as additional items many companies include in their training, forty (40) hours is far too long. All of the required information is currently being taught in classes in 16 to 24 hours. The additional hours are unnecessary and costly to industry. Additionally no provisions are included to give credit for classes that our personnel have already attended. Without this credit industry would be forced to retrain Logging Supervisors at a great cost in time and money.

11) 39.61 (a) (2):

Remove the words "copies of and". There is no need for each Logging Supervisor to have his/her own copies of the listed items as these items are already present at each District as well as at each job site.

12) 39.61 (b) (2):

Remove the words "copies of and" as described in Number 11 above.

13) 39.61 (b) (4):

The term "under the personal supervisor of the Logging Supervisor" should be changed to "under the personal supervisor or a Logging Supervisor". The word "the" implies that an assistant could only work under the supervisor that trained him while the nature of our work requires that assistants work under numerous supervisors.

14) 39.61 (c):

Annual retraining is too often to be of value. If retraining is deemed desirable an interval of every three (3) years would be sufficient. See item one (1) for more information.

15) 39.65 (b):

Add to the end of the sentence "if the quantities used exceed regulatory limits". This will prevent this section from being interpreted to mean that bioassays are necessary after all tracer jobs.

16) 39.73 (a) (1)

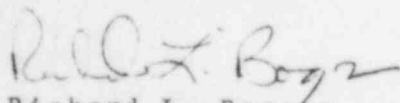
Specify which "applicable NRC Regulations" are required. Sections 19, 20, 21 and the new Section 39 would be appropriate.

17) 39.73 (a) (9):

Delete Section 9 and allow all training records to be kept on file at the Corporate Office or other central location.

The changes outlined herein would be much more desirable to industry while still affording our employees, our customers and the public with maximum protection from our materials. We appreciate the opportunity to comment on these proposed regulations.

Sincerely,



Richard L. Borgus
Radiation Safety Officer