



PRECISION WELL PERFORATING CORPORATION

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PROPOSED RULE PR-19,20,21 et al (94)
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USNRC

U. S. Nuclear Regulatory Commission
Docketing and Service Branch
Washington, D. C. 20555

SEP 23 11 09

Attention: Secretary of the Commission

DOCKETING & SERVICE
BRANCH

Dear Sir:

I am writing in regard to the proposed requirements for well-logging operations. I agree that a set of standards are needed for our industry to promote safe operations, but I do not agree with one of the proposed rules.

CFR 39.61 (Training) would create a burden on small companies such as ourselves. Last year the cost of a three day/24 hour training course was \$375 per person. A 40 hour class would surely cost much more. The cost of this class would not have as big an impact as would having an engineer gone for one week to attend a class. We have three engineers and seven other employees to staff four trucks. Having one or two engineers gone would cost thousands of dollars in lost revenue due to having no one to run our trucks. Small independent companies do not have the resources available that major service companies enjoy. We do not have other stations from which we could get a replacement engineer, nor do we have formal in-house training classes that would meet NRC standards. There are several small companies in our area that have only one or two engineers which would just have to shut down to attend the proposed yearly training course. I feel that everyone should be required to attend one formal training class as these courses do offer very important information. However, there are service companies that make severe mistakes in judgment, which in turn penalizes the whole industry. These are the people that should be required to attend the class each year. We have been in business for over 24 years and have never had an incident involving Radioactive Material. Our engineers have had the required formal training and all other employees have had the required training. Our engineers have over 42 years combined experience using Radioactive Material. For this reason, I believe yearly retraining is unnecessary.

The proposed training requirements should be looked at on a case by case basis. Due to the uncertain future with which our industry is faced, the oil business as a whole is steadily declining. The number

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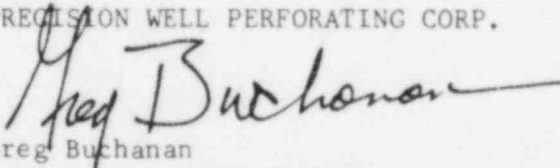
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of wells has decreased while competition for the few remaining jobs has greatly increased. In 1983 we did 1152 jobs at an average of \$1605 per job which resulted in \$1,848,960 gross revenue. In 1984 we did 852 jobs at an average of \$1509 per job which resulted in \$1,285,639 gross revenue. 1985 is running approximately 16% below 1984 which calculates to 512 jobs at an average of \$1411 per job and a gross revenue to date of \$722,432. The proposed rule would further complicate our business and cause further hardship. All other proposed rules have already been incorporated into our license and, other than the additional man-hours and paper work, do not have as severe an impact.

Thank you for the opportunity to express our views on this matter.

Sincerely,

PRECISION WELL PERFORATING CORP.



Greg Buchanan
Radiation Safety Officer

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