

DOCKET NUMBER

PROPOSED RULE

PR-19,20,21 et al (63)

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DOCKETED  
USNRC

## Wyoming Fuel Company

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

July 18, 1985

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

Attn: Docketing and Service Branch

Dear Sir:

I understand that the Nuclear Regulatory Commission (NRC) has proposed new regulations covering the use of sealed radioactive sources. One of the proposed regulations prohibits logging holes with radioactive sources unless surface casing is in place through all fresh water aquifers. If adopted, this regulation would restrict the mineral industry from running Gamma Gamma Density or Neutron Logs unless the drill hole were cased.

Wyoming Fuel Company (WFC) has actively explored for coal and uranium in the Western States since 1978. WFC has explored numerous prospects in New Mexico, Arizona, Colorado, Wyoming and Nebraska by drilling. Several coal mines and one uranium mine have been developed as a result of this drilling. Over 2,000 holes were drilled during this exploration. All of these holes were logged without casing and no probes were lost. To my knowledge, logging of these holes with radioactive sources has resulted in no adverse effect on any fresh water aquifer. If the proposed regulation is adopted, the cost would be \$1,000-5,000 per drillhole. This additional cost would increase exploration costs 50-100 percent and effectively limit mineral exploration. This is a tremendous burden to place on an already depressed mineral industry.

I suggest that the NRC reconsider the effect of this proposed regulation before it's adoption.

Sincerely,

*Stephen P. Collings*Stephen P. Collings  
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Acknowledged by card