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July 16, 1985

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

Dear Sirs:

Although the time period lapsed on July 8, 1985, I am sending comments on the proposed regulations concerning open-hole geophysical logging being proposed by NRC. It appears that the commission is not aware of the consequences which this proposed rulemaking would inflict on the state of technology of coal-seam exploration in the United States. The U.S. coal industry has lagged behind other industries in application of advanced technologies which would make it competitive in a world market. The use of geophysical logging has proven for us to be a very safe and useful technique for accurately determining characteristics of coal seams. The knowledge which is obtained through geophysical logging cannot be obtained through other means. Information obtained from logging of boreholes and core drilling provides a means of determining the geologic environment in which coal deposits were formed and thus provides geologists and engineers with necessary information with which to prudently and efficiently design mining plans. Proper mining plans are the means by which the U.S. coal industry can insure that the valuable resource which we are responsible for are conserved for future needs of our country. Waste of coal reserves is a problem which has plagued our industry in the past, and is an area in which we have made great strides by the use of highly accurate geologic information to prudently develop coal deposits.

Accuracy of the information which is obtained through open-hole geophysical logging is the reason this information is so valuable to mining engineers and geologists in the coal industry. This accuracy is not going to be available to us if open-hole logging is prohibited under the proposed regulations. It would be a clear mistake to require that coal seam geophysical logging be treated identically to oil and gas logging, since the differences between the two types of exploration are so many. Understanding of these differences is the responsibility of nuclear energy regulators, and should be investigated to determine regulatory guidelines which provide for safety of the public without unnecessarily hindering the technology of an industry. It is not the intent or desire of our industry to in any way create a hazard to the health and

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Add: Anthony H. Tse, 113055  
Bruce Carver, 39655

well-being of the American public, but regulators have a responsibility to be prudent just as we do.

Not only would accuracy of geologic information be in jeopardy by prohibiting open-hole geophysical logging, the coal industry exploration costs would be at least doubled by enforcement of the proposed regulations. Logging of rotary-drilled holes, a less-expensive and efficient means of obtaining accurate coal-seam information, would not be possible after the regulations took effect, requiring all coal-seam information to be obtained through core drilling, which is always at least twice as expensive as rotary drilling. Given that our particular company spent at least \$ 500,000 on drilling just last year, it is a conservative estimate that these requirements would cost our industry tens of millions of dollars per year, and might not even have a positive effect on public safety.

It is my strong opinion that geophysical-logging technology and techniques utilized by the coal industry be evaluated separately from oil and gas logging, so that our state of technology is not adversely affected through what might seem to be an oversight. I am not advocating that safety guidelines are not in order for coal-seam logging, but the differences in the types of exploration should be taken into account to insure that safety requirements serve to reach the goal desired by the regulators.

I would like to suggest that representatives of the Office of Nuclear Regulatory Research meet with representatives of the coal exploration business to draft mineral-logging requirements which serve to prudently protect the safety of the public.

Sincerely,



Charles G. Snavelly. P.E.  
Chief Engineer  
Martin County Coal Corporation  
HC 69, Box 640  
Inez, Kentucky 41224  
(606) 395-6881