



Chevron Resources Company

A Division of Chevron Industries, Inc.
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PROPOSED RULE **(50 FR 13797)** **(66)**

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USNRC

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Proposed Rules:
Federal Register, Vol. 50, No. 67
Pages: 13797-13810

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

Gentlemen:

Chevron Resources Company has utilized geophysical well logging tools containing radioactive sources (ie: those subject to the proposed rules) in our non-hydrocarbon exploration and evaluation activities. We have successfully used these valuable evaluation tools for a wide variety of targets, including base metals, coal, geothermal resources, oil shale, potash, precious metals, and uranium.

We have found that radioactive logging tool measurements are most valuable if performed in an uncased bore hole environment. We are thus concerned that the proposed Regulations may deny valuable exploration and evaluation information to the minerals industry.

Chevron Resources uses outside vendors for nuclear logging services. In 1980, we reviewed industry nuclear logging practices and instituted the following procedures for our operations:

1. All bore holes to be logged with a radioactive source must have at least one length (20-30 ft) of surface collar casing (PVC acceptable) to keep the surface of the bore hole open and clear.
2. The first logging trip into the bore hole must be run without a radioactive source. Any bridges or tight spots encountered must be cleared before a radioactive source is lowered into the bore hole.

We, Chevron Resources Company, feel that the implementation of the above operational procedures has greatly reduced the risk of creating irretrievable well logging source incidents.

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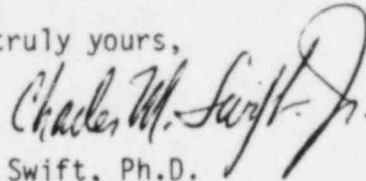
Secretary of the Commission

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July 23, 1985

We hope that our own experience may be useful in establishing reliable NRC safety standards which do not deny valuable evaluation tools to the minerals industry.

Very truly yours,

A handwritten signature in cursive script, reading "Charles M. Swift, Jr.".

C. M. Swift, Ph.D.
Chief Geophysicist

cc: Dr. Anthony N. Tse
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555