



FILE NUMBER
PROPOSED RULE PR-19,20,21 et al.
(50 FR 13797) (57)
DOCKETED
USNRC

Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.
Commissioner

1100 West 49th Street
Austin, Texas 78756-8189
(512) 458-7444
Radiation Control
(512) 835-7000

Robert A. MacLean, M.D.
Deputy Commissioner
Professional Services
Hermas L. Miller
Deputy Commissioner
Management and Administration

July 2, 1985

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

ATTN: Docketing and Service Branch

Dear Sir:

Thank you for the opportunity to comment on the proposed addition of 10 CFR 39 entitled "Licenses and Radiation Safety Requirements for Well Logging Operations." Staff of the Bureau of Radiation Control have reviewed the proposed rule. As a whole, we support the proposed rule and uniform safety procedures for the well logging industry in regulations of the Commission and Agreement States.

The Bureau offers the following minor comments on specific sections of the proposed rule:

- 1) Section 39.15 - The delineation of the conditions of written agreements with well owners or operators will clarify responsibilities of the licensee in the event of an irretrievable sealed source. We feel that this is a good expansion of the similar section in Part W of the Suggested State Regulations for Control of Radiation.
- 2) Section 39.39(a)(2) - We recommend an additional phrase to the paragraph as follows: "... in a particular well and the disposition of any unused tracer materials."

8507180457 850702
PDR PR
19 50FR13797 PDR

DS10
add Anthony N. Tse, 113033

1/0

Acknowledged by card JUL 11 1985
JUL 11 1985
pd

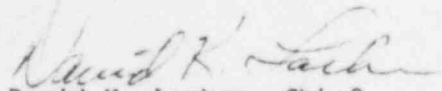
Secretary of the Commission
July 2, 1985
Page 2

- 3) Section 39.77(d) - The addition of another item for inclusion in the notification report is recommended as follows:

(11) A description of the vertical location of the lost source with respect to local freshwater aquifers.

If you have any questions regarding these comments, please contact us.

Yours truly,



David K. Lackner, Chief
Bureau of Radiation Control

cc: Donald A. Nussbaumer
Office of State Programs