

Full Comment # 56

DOCKET NUMBER **PR-19,20,21 et al**
RECORDED RULE
(50 FR 13797)

OLD BEN COAL COMPANY

333 West Vine Street • Lexington, Kentucky 40507 • (606)253-3300 • Telex: 910-997-0495

DOCKETED
USA 85



OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

July 8, 1985

Mr. Nunzio Palladino, Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Palladino:

Attached is a copy of comments provided to the Secretary of the Nuclear Regulatory Commission concerning proposed rules affecting drillhole physical logging. As stated in the attached comments, it is this company's opinion that notification procedures for these proposed regulations were inadequate. The preliminary Regulatory Analysis in no way addresses the true costs of compliance with the proposed regulations, and the radioactive sources used in geophysical logging of coal exploration drill holes are so small that the increased public safety supposedly gained by compliance with these regulations cannot be justified. Your intercession on behalf of the coal mining and coal geophysical logging industries in extending the deadline for comments and promulgating more reasonable regulations would be appreciated.

Respectfully submitted,

OLD BEN COAL COMPANY

Dennis M. DeWilde

Dennis M. DeWilde
Vice President, Engineering
and Environmental Affairs

DMD/lis

8507180505 850708
PDR PR
19 50FR13797 PDR

ADD ANTHONY TSE, 113053
1/0

acknowledged by card

JUL 16 1985

pd