

DOCKET NUMBER
PROPOSED RULE

PR-19.20, 21 et al
(50 FR 13797)

(76)



Northwestern Resources Co.

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(409) 291-3465 / P.O. Box 149, Huntsville, Texas 77340

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USNRC

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July 30, 1985

OFFICE OF SECRETARY
DOCKETING SERVICE
BRANCH

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

Attn: Docketing and Service Branch

RE: Radiation Safety Requirements for Well Logging Operations

Dear Dr. Tse:

Northwestern Resources Co. requests that the rules for casing all holes prior to well-logging operations be revised to the following:

§39.51 The licensee may not use a sealed source in a well without a surface casing designed to protect fresh water aquifer zones unless the well is regulated by 30 CFR Parts 770 and 776 or procedures for protecting these zones are specifically approved by the Commission.

This language change will exempt from the regulation those wells bored for the exploration or production of coal and regulated by or under approval by the Office of Surface Mining. This change does not remove the Commission's requirement for reporting incidents of lost sources or abandonment procedures.

The currently proposed wording negatively affects Northwestern Resources Co. During the past ten years Northwestern has drilled and logged over three thousand holes at the Texas mine alone. Over seven thousand holes have been drilled and logged at other locations by this company and its parent company at locations throughout the western and southern United States. It is anticipated that an additional five thousand bore holes will be drilled during the next ten years in Texas alone. No radioactive source has been lost downhole nor have any special recovery techniques or abandonment procedures been implemented.

The anticipated increased costs of this regulation is a result of reduced productivity of a drill rig to install and remove the protective casing. Northwestern Resources has calculated that the time required at each well hole location would increase from approximately 0.5 hours to 1.5 hours per location. This increased cost resulting from lower productivity and

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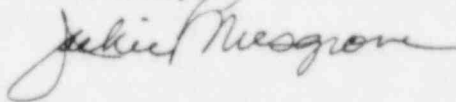
Letter - U.S. Nuclear Regulatory Commission
July 29, 1985
Page Two

therefore, a higher cost per hole would result in a total increase of 20 percent for the drilling program at the Texas mine. Northwestern Resources has always been committed to meet the abandonment and recovery requirements which the Commission currently has in place and is willing to accept this risk in lieu of installing a surface casing in every bore hole.

To add these costs to the coal mining industry is unreasonable and not in agreement with the development and maintenance of the national coal policy. I urge the Commission to adopt the change which is proposed herein or to delay adoption until the Commission and coal industry have the opportunity to fully evaluate the impacts of the currently proposed rule.

Should you have any questions or desire additional information, please contact me.

Sincerely,



Jackie L. Musgrove
Director, Environmental Services

JLM/kds

cc: Mark Palmquist
Jim Francis
Bill Robinson/WEC, Butte
Tom Loberg/WEC, Butte