

DOCKET NUMBER

PROPOSED RULE

URANERZ U.S.A., INC.

190 Pronghorn

Casper, WY 82601

July 29, 1985

PR-19,2421 et al
(50 FR 13797)

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DOCKETED
USNRC

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attention: Docketing and Service Branch

Re: Federal Register Vol. 50, No. 67
Pages 13797-13810 - 10 CFR 39
Proposed Rules - Use of Sealed
Source

Dear Secretary:

Uranerz U.S.A., Inc.'s uranium mining section would like to have these comments entered into the record on the above referenced proposed rules.

As the attached statement, prepared by our section geologist, points out that these proposed rules could drastically effect the method of exploration, as well as the overall costs to uranium exploration. Also, UUS's mining section is concerned because one of the major constraints for solution extraction is that the ore body must be below the water table or within an aquifer. Without a clear definition of "fresh water zone" this could be within the target zones and, therefore, the methods and costs could, in fact, greatly impact an already depressed industry.

UUS feels that the economic impacts to the uranium industry should be re-evaluated against the potential risk factor. The rule references 50,000 drilling events and has less than a dozen "accidents", but the rule is geared to coal and no mention of uranium exploration using the same technique. The overall cost effect versus risk benefit should be looked at in all potential industries that could be impacted by this rule.

UUS would like to thank the Commission for the opportunity to respond to this proposed rule.

Sincerely,

URANERZ U.S.A., INC.

K. Gary Somerville
Regulatory Affairs Officer

Attachment
KGS:jm

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Acknowledged by card

URANERZ U.S.A., INC.

Memorandum

To: George Hartman

Date: 7/23/85

From: Kenneth McFall

Subject: Proposed NRC Regulation Concerning Logging
with Radioactive Sources, 10 CFR Part 39 -
Proposed Rule

The proposed regulations would have a serious detrimental effect on uranium exploration and development of ore bodies in a sandstone aquifer. In the geochemical cell type of deposits, uranium is most commonly found in the aquifers that the proposed regulation would blind off by using casing or drill stem for protection of the sand. The use of both a neutron log and a delayed fission neutron tool, which are both very useful in uranium exploration and development, require the use of a radioactive source. The effects of casing would be to render less accurate, if not useless, S.P., resistance, and neutron logs which operate best in contact with the formation. The regulation would also be expensive, for it would require that the wells be logged without a radioactive source to locate the aquifers, casing to be set and the well then relogged with the source. Rig time would be increased by about 50% and logging costs would approximately double with the extra time involved and two logging runs instead of one. This proposed regulation would be both inconvenient and expensive to the uranium industry.


Kenneth T. McFall

KTM:jm