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DOCKET NUMBER PR-19,20,21 et al  
PROPOSED RULE (50 FR 13797) (82)



July 29, 1985

DOCKETED  
USNRC

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

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sir:

Anaconda Minerals Company offers the following comments to your proposed rules for 10CFR, Parts 19, 20, 21, 30, 39, 40, 51, 70, 71 and 150; "Licenses and Radiation Safety Requirements for Well-Logging Operations" as published in the April 8, 1985 Federal Register.

Our primary concern is for the proposal that all holes be cased prior to logging with a radioactive source to prevent the possibility of contamination of fresh water horizons. In our opinion, such a rule universally applied would add immediate and unnecessary costs and operating burdens on the coal industry since coal seams tend to fit the definition of aquifer given in the notice.

If the proposed rule were made final, down hole density logs would essentially be eliminated in the coal industry. Very few holes have casing in place when geophysical logs are run. The radioactive sources used in the coal industry are relatively weak and casing would stop most of the emitted particles so an accurate measurement could not be obtained. Density data is absolutely essential and the single most important measurement in the coal industry for verifying coal seam characteristics. Setting casing or leaving drill rods in place for logging would, in our opinion, cause unnecessary and significant increases in exploration costs and most certainly decrease the quality of exploration data. Good exploration data is essential for cost effective and environmentally sound mine planning and operation.

We believe that the proposed rule change discriminates against the coal industry because the rule fails to differentiate between different industry practices, risks, and strength of sources. We suggest that before implementing a blanket rule for all types of well-logging, that the health and failure risks should be thoroughly evaluated for each type of well logging application in different industries. We believe that such an evaluation will show that the regulations to be applied to the coal industry serve to add unnecessary costs and could only decrease exploration data quality.

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Acknowledged by card... *AWP*

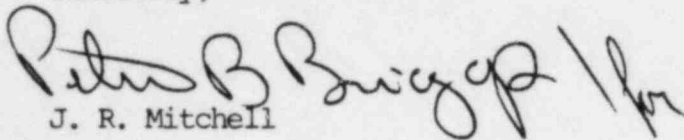
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However, we recognize that tools lost down hole could be a problem and we recommend that the commission concentrate on developing equitable and scientifically and technically sound ways to recover and isolate tools lost down hole.

In closing, we would like to thank you for the opportunity to comment on these proposed regulations. If you have any questions regarding our comments or would like to pursue the issues further, please contact us.

Sincerely,

  
J. R. Mitchell

PPB:JRM:pb

cc: C. Burton  
J. Clanton  
G. Rupp  
J. Schrack