



Hecla Mining Company

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attn: Docketing and Service Branch

Dear Sirs:

Hecla Mining Company offers the following comments on the proposed regulation, "Licenses and Radiation Safety Requirements for Well-Logging Operations" published in the April 8, 1985 Federal Register:

1. The requirement for casing a well before using a sealed source should be eliminated. A requirement to case every exploration drill hole will increase drilling costs five to ten-fold and result in the elimination of such drilling programs. Logging through the drill pipe is also expensive and prevents the use of SP, resistivity logs and gamma logging, which are necessary in uranium exploration.
2. A new drilling probe on the market uses a sealed source to assay silver in a drill hole. Casing of the drill hole would limit the use of this new technique.
3. Adequate regulations already exist for the very few probes that are abandoned in drill holes. Abandoned probes account for a very small percentage of well-logging operations.

Hecla Mining Company appreciates the opportunity for comment on these proposed regulations.

Sincerely,

Wm. A. Griffith, Chairman,
President and Chief Executive
Officer

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WAG:jr

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Acknowledged by serd... AUG 10 1985 *pd*