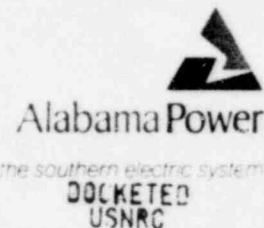


JESSE S. VOGTLE
Executive Vice President and Counsel



August 14, 1985

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Licenses and Radiation Safety Requirements
for Well-Logging Operations

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. John C. Hoyle,
Acting Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Hoyle:

Alabama Power Company hereby submits the following comments and observations regarding the subject proposed rules as published in the Federal Register Vol. 50, No. 67, April 8, 1985, concerning the use of sealed radioactive sources in well logging operations.

The Company is presently in the process of amending Alabama license number 496 to include several sealed sources used in well logging. These include two 250 millicurie Americium 241 sources, one 125 millicurie Cesium 137, and one 3.0 curie Americium-Beryllium neutron source. Our interest in well logging results from the engineering data that can be obtained from in-situ logging. These data are extremely useful in determining quality of rock foundations and in exploration of sites for proposed power generating plants. Well logging also provides us with useful data pertinent to subsurface or ground water hydrology and environmental geology.

Since Alabama is an area of abundant ground water, the majority of exploratory borings completed by Alabama Power Company penetrates several fresh water aquifer zones. To isolate these ground water zones in the shallow engineering data borings we utilized would involve, in most instances, casing the entire hole. A boring completed in this manner would be of little use in providing engineering or design data because the required precision of data would be absent. In fact, the areas of most intense geotechnical interest such as shear zones, faults, joints or other structural discontinuities are frequently zones of copious ground water production. The proposed rule will prevent the generation of the highest quality data that Alabama Power Company requires for state-of-the-art foundation design. As an investor-owned utility, Alabama Power Company is obligated to provide electricity to its customers in the most efficient and cost effective way possible. Being deprived of the unique and essential data generated by the radiation emitting logging tools could infringe on this mission. It is our opinion that this section of the proposed NRC rule would adversely affect our construction foundation exploration activities.

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Acknowledged by card.....

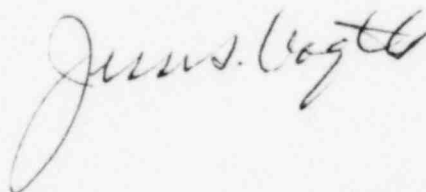
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add: Bruce Carrico, 39655
Steven McGraw, 113055
William Olinstead, 9000000

Mr. John C. Hoyle
August 14, 1985
Page 2

Other features of this proposed rule also affect the operation of our exploration activities. The proposed rule specifies the terms of agreement with the well owner or operator in that the owner or operator accepts responsibility for a lodged or irretrievable source in a well. Further clarification is needed on this point. Geotechnical exploration is different from oil exploration in that numerous shallow holes are drilled over a fairly large areal extent in order to locate optimum foundation conditions. Frequently these borings are completed on property belonging to farmers or other small landowners who have neither the resources, the technical expertise nor the desire to be involved in any way with an accident involving radioactive materials. Individuals such as these may be most reluctant to enter into an agreement allowing exploratory drilling and logging on their property.

In conclusion, the proposed rule, though designed for the petroleum exploration industry, will impact and penalize small licensees using logging equipment for other purposes. The NRC has given little, if any, consideration to users in mining, geotechnical engineering or hydrology. The proposed rule will drastically affect many small companies in these fields in their use of radioactive logging equipment. It is conceivable that many engineering and construction firms will be prevented from using radioactive logging at all.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James S. Coyle".

JSV:fm