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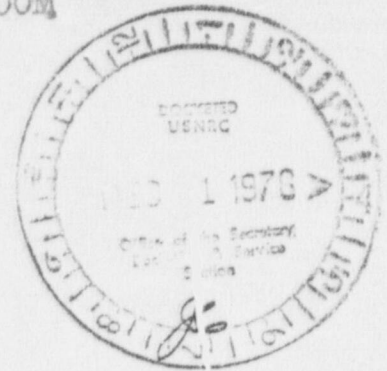
November 10, 1978

DOCKET NUMBER

Secretary of Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

PROPOSED RULE

PR-30,70(43FR44547)



Attention Docketing and Service Branch

Gentlemen:

This is to comment on proposed rules of general applicability to domestic licensing of by-product materials (7590-01) published in the Federal Register September 28, 1978.

In general the proposed rules are in keeping with the present practice and the proposed rules being prepared by the conference of Radiation Program Directors; however, I offer the following recommendations:

- 30.56(a) The first sentence requires a written agreement but does not specify the parties to the agreement. A written agreement between the well owner/operator and the well logging company (NRC and agreement state licensee) is appropriate and should be specified. The phrase "thirty (30) days of an event...." should be reworded to "thirty(30) days of final abandonment....."
- 30.56(a)(3) The purpose of the plaque is to bring to the attention of someone considering re-entry of the well the presence of the radioactive material. If we use too many words, the plaque will not be read. I suggest that "and the city and state where his main office is located" be deleted. I also recommend that the words "if the topmost part of the well is above the surface" be added to the end of the sentence. In most cases of abandonment of a well, a cement plug is placed through the shallow water zone and the casing cut off below plow depth (normally 3') or below the ocean bottom for wells drilled over water. The plaque serves no purpose in these cases (if you can't find the well, you can't re-enter it).

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- 30.56(b) I fail to see how representatives of the commission will be able to "make a determination that the source is irretrievable." This is a complicated decision that can only be made by persons with long experience in oil field operations and total access to the many varied factors involved in the specific incident. I believe this decision should be made by the well owner/operator in conference with the state or federal oil and gas permitting agency (i.e., US G. S., Oil and Gas Commission etc.). The NRC and agreement states should retain the right to question the decision, not make the decision.
- 30.56(c)(7) I do not see the purpose of reporting the depth of the well. This is often privileged information to the well owner/operator, and serves no purpose, and should not be required.
- 30.56(c)(10) I see no purpose in requiring this information. The "fishing" may extend over many days (sometimes exceeding 30), and even a "brief description" would run to several pages of unneeded information. I recommend that (c) (10) be deleted.

I appreciate the opportunity to comment on these proposed rules.

Sincerely,

C. E. Racster
Radiation Safety Officer

CER:dr