



FILE NUMBER
 PROPOSED RULE **PR-19,20,21 et al.**
 (50 FR 13797) (57)
 DOCKETED
 USNRC

Texas Department of Health

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 Commissioner

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July 2, 1985

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

ATTN: Docketing and Service Branch

Dear Sir:

Thank you for the opportunity to comment on the proposed addition of 10 CFR 39 entitled "Licenses and Radiation Safety Requirements for Well Logging Operations." Staff of the Bureau of Radiation Control have reviewed the proposed rule. As a whole, we support the proposed rule and uniform safety procedures for the well logging industry in regulations of the Commission and Agreement States.

The Bureau offers the following minor comments on specific sections of the proposed rule:

- 1) Section 39.15 - The delineation of the conditions of written agreements with well owners or operators will clarify responsibilities of the licensee in the event of an irretrievable sealed source. We feel that this is a good expansion of the similar section in Part W of the Suggested State Regulations for Control of Radiation.
- 2) Section 39.39(a)(2) - We recommend an additional phrase to the paragraph as follows: "... in a particular well and the disposition of any unused tracer materials."

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Acknowledged by card. JUL 11 1985 pd

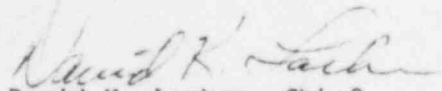
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- 3) Section 39.77(d) - The addition of another item for inclusion in the notification report is recommended as follows:

(11) A description of the vertical location of the lost source with respect to local freshwater aquifers.

If you have any questions regarding these comments, please contact us.

Yours truly,



David K. Lackner, Chief
Bureau of Radiation Control

cc: Donald A. Nussbaumer
Office of State Programs