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U.S. NUCLEAR REGULATORY COMMISSION  
BEFORE THE PRESIDING OFFICER

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LICENSEE: MOLYCORP, INC.  
(Washington, Pennsylvania Site Decommissioning Plan)  
License No. SMB-1394  
Docket Nos. 040-08794 and 040-08778  
ASLBP No. 00-775-03-MLA

JOINDER TO MOTION TO COMPEL AND  
REQUEST FOR SCHEDULING

The Petitioner/Requestor, the CITY OF WASHINGTON, by and through its Solicitors, SMIDER & WATSON, P.C., hereby files the following Joinder to Motion to Compel and Request for Scheduling and in support thereof states as follows:

1. On or about the August 31, 2000, CANTON TOWNSHIP filed a Motion to Compel and Request for Scheduling in the above-referenced matter.

2. The CITY OF WASHINGTON hereby joins the request of CANTON TOWNSHIP as though the same were more fully set forth herein at length in its entirety including, but not limited to, its request for relief as stated in said motion.

WHEREFORE, the CITY OF WASHINGTON, respectfully requests that an Order be entered compelling the NRC and MOLYCORP, INC. to produce any and all documents exchanged between the parties relating to the decommissioning plan (part 1 and part 2), including

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but not limited to those documents referred to herein and any other related documents, granting the CITY OF WASHINGTON leave for additional time to review and adequately respond, thereafter issuing a scheduling Order, and granting such other and further relief as the Presiding Officer deems as just.

Respectfully submitted,

SMIDER & WATSON, P.C.

A handwritten signature in cursive script, appearing to read "Jeffrey A. Watson", is written over a horizontal line.

Jeffrey A. Watson, Esquire  
Solicitors for the City of  
Washington, PA

CERTIFICATE OF SERVICE

I, Jeffrey A. Watson, Esquire, Solicitor for the City of Washington, hereby certify that the original and/or copy of the foregoing Joinder To Motion To Compel And Request For Scheduling has been served this date on the following in the following manner, which service complies with the rules and regulations of the U.S.

Nuclear Regulatory Commission:

Via U.S. First Class Mail:

Administrative Judge Charles Bechhoefer  
Presiding Officer  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dr. Richard F. Cole  
Special Assistant  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Office of Commission Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and Adjudications Staff

John T. Hull, Esquire  
U.S. Nuclear Regulatory Commission  
Mail Stop 0-15 D21  
Washington, D.C. 20555

Molycorp, Inc.  
300 Caldwell Avenue  
Washington, PA 15301  
Attention: John Daniels  
Licensee

Randolph T. Struk, Esquire  
Thorp, Reed & Armstrong, L.L.P.  
One Riverfront Center  
Pittsburgh, PA 15222  
Counsel for Licensee

Samuel P. Kamin, Esquire  
Goldberg, Kamin & Garvin  
1806 Frick Building  
Pittsburgh, PA 15219  
Special Counsel for Canton Township

Respectfully submitted,

SMIDER & WATSON, P.C.



Jeffrey A. Watson, Esquire  
Solicitors for the City of  
Washington, PA

Date: 9-06-00