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UNOCAL

September 25, 1992

Mr. John H. Austin
Chief
Decommissioning and Regulatory Issues Branch
Division of Low Level Waste Management and Decommissioning
Office of Nuclear Material Safety and Safeguards

re: Request for Scheduler Exemption

Dear Mr. Austin:

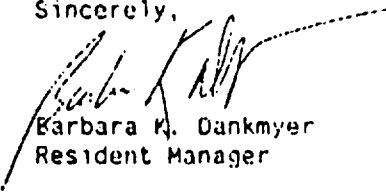
This letter is a request from MolyCorp's Washington, PA facility for a scheduler exemption of the decommissioning funding plan as outlined in 10 CFR 40.36(c)(2).

We request the exemption to allow time to conduct a site characterization. The site characterization is necessary to develop a basis for a decommissioning clean-up plan and funding plan. Findings of the characterization will influence the viability of clean-up options and the costs associated with them.

After the site characterization is completed, we will need a period of time to develop the clean-up criteria. The large volume of low-level material the facility has on site lends itself to exploration of innovative options such as off-site disposal in a mine or reclamation of the thorium and/or lanthanide contents to reduce the total volume. Some additional time is required to pursue these types of options which will have a significant impact on the costs of clean-up.

We propose submitting a decommissioning funding plan at the time we submit the decommissioning plan. This is to be no later than six months after the initial submission of the site characterization report as outlined in our request for license renewal. This will allow us to assess the findings of the report and explore innovative options, of which both will have impact on the decommissioning funding plan.

Sincerely,


Barbara K. Dankmyer
Resident Manager

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cc: C. Glenn, NRC
D. Shoemaker
G. Dawes

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