

April 3, 2001

Mr. Max Howie, Jr., Chief
Program Evaluation, Records, and Information
Services Branch
Division of Health Assessment and Consultation
Agency for Toxic Substances and Disease Registry
Mail Stop E-56
1600 Clifton Road, NE
Atlanta, GA 30333

SUBJECT: COMMENTS ON THE MARCH 13, 2001, PETITIONED PUBLIC HEALTH
ASSESSMENT FOR MOLYCORP, INC., WASHINGTON, PA, FACILITY

Dear Mr Howie:

We appreciate the opportunity to comment on the subject report. Our comments are enclosed.

If you have any questions concerning our comments, please call Dr. Tom McLaughlin of my staff at (301) 415-5869.

Sincerely,

/RA/

Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: Review Comments

Docket No.: 040-08778
License No.: SMB-1393

cc: Molycorp, Washington Dist. List

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DATE	4 / 3 /01	4 / 3 /01	4 / 3 /01

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**U.S. NUCLEAR REGULATORY COMMISSION STAFF
COMMENTS ON DRAFT PUBLIC HEALTH ASSESSMENT
FOR THE MOLYCORP, WASHINGTON, PA, FACILITY**

A. GENERAL COMMENTS:

1. There still are several statements in the draft report that refer to the existence of the slag pile and roll-off boxes at the Washington facility. On page 9 under **Health Impact of Radiological Contamination**, the first sentence states that the roll-off boxes and waste slag pile are currently being shipped off-site; the third sentence addresses plant growth on the slag pile. On page 14 under **Physical Hazards**, the second sentence addresses the slag pile and roll-off boxes. These statements need to be updated or eliminated because the slag pile has been removed and the roll-off boxes have been emptied.
2. The production of metal alloys from Brazilian ore is mentioned 4 times in the document (2 times on page 4, and once on each of pages 6 and 10). The Brazilian ore was used in the production of ferrocolumbian and was licensed as source material. Molycorp used other ores to produce molybdenum and lanthanides which did not contain source material. Therefore, on page 6 under **Radiological Contamination**, the reference to molybdenum should be deleted. Also, the metallurgical name columbium is used on page 4 while the chemical name niobium is used on pages 6 and 10. For clarity, either "columbium" or "niobium" should be used, but not both.
3. There are several errors concerning references. The two references to [17] on page 8 should actually be reference 18. Reference [19] on page 8 at the end of the last paragraph should be reference 20. References 16 and 19 are the same document.

B. SPECIFIC COMMENTS

1. Top of page 5. The statement is made that Molycorp submitted a decommissioning plan (DP) and that plan was rejected. The report should state that Molycorp subsequently submitted a Part 1 Revision to its DP in 1999 and that the DP was accepted by NRC in August 2000.
2. Last sentence in first paragraph on page 7. The statement is made that "Although not a health threat, radium 228 and thorium 232 were found at detectable levels in ground and surface waters." We suggest that the report state the actual levels found and compare them to the regulatory limits.
3. Last sentence in second paragraph on page 7. The report should state that the material was shipped.

Enclosure