

May 1, 2002

Mr. George W. Dawes
Facility Superintendent
Molycorp, Inc.
300 Caldwell Avenue
Washington, PA 15301

SUBJECT: TECHNICAL REVIEW OF REQUEST FOR AN AMENDMENT TO LICENSE
SMB-1393 (DOCKET NO. 040-08778) PROPOSING AN ALTERNATE
DECOMMISSIONING SCHEDULE (TAC #L52054)

Dear Mr. Dawes:

I am responding to your letter of February 19, 2002, which forwarded the Molycorp, Inc., Washington, PA, facility alternate decommissioning schedule for U.S. Nuclear Regulatory Commission (NRC) staff review and approval. We have completed the technical review of your request and find the alternate decommissioning schedule to be acceptable. It is understood that a number of buildings overlie contaminated areas which affects the determination of the volume of contaminated material and, therefore, the time it will take to clean up the site. Upon completion of the building demolition and supplemental soil characterization of the facility to verify the estimated volume of contaminated material, please provide an updated schedule for the completion of the excavation and final status surveys.

The license currently requires Molycorp, Inc., to decommission by August 2002, which is within 2 years of the date that the decommissioning plan was approved. Molycorp, Inc.'s, proposed alternate decommissioning schedule shows that all decommissioning activities will be completed by the end of 2004. Therefore, License Condition 15 is changed with the addition of a new subpart G which reads as follows:

- G. Molycorp, Inc., will decommission under an alternate decommissioning schedule using a phased approach. The buildings on-site will be demolished and the soils will be characterized to determine an estimated volume of contaminated material. Upon completion of the building demolition and supplemental soil characterization of the facility to verify the estimated volume of contaminated material, Molycorp, Inc., will provide an updated schedule for the completion of the excavation and final status surveys. Molycorp, Inc., will excavate the contaminated soils and transport them off-site to an NRC approved facility and complete decommissioning activities by the end of 2004.

NRC has modified its policy on identifying a specific individual as the Radiation Safety Officer in the license. Therefore, License Condition 12 is changed to read as follows:

- 12. The Site Radiation Safety Officer shall have completed a basic radiation safety course and at least 2 years of work experience in applied radiation protection.

George W. Dawes

-2-

All other conditions of the license remain the same. The revised license, which incorporates Amendment No. 6, the related Safety Evaluation Report, and Environmental Assessment are enclosed.

If you have any questions or comments related to this amendment, please contact 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

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

cc: Molycorp, Inc., Washington Distribution List

Enclosures:

1. License Amendment No. 6
2. Safety Evaluation Report
3. Environmental Assessment

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Docket No.: 040-08778
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DATE	4/11/02	4/11/02	4 / 11/02	4 / 19/02	5 /01/02

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ENCLOSURE 1

MATERIALS LICENSE

Amendment No. 6

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and the applicable parts of Title 10, Code of Federal Regulations, Chapter I, Parts 19, 20, 30, 31, 32, 33, 34, 35, 36, 39, 40, 51, 70, and 71, and in reliance on statements and representations heretofore made by the licensee, a licensee is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		
1. Molycorp, Inc.		3. License Number SMB-1393 is amended In its entirety to read as follows:
2. 1201 West 5 th Street, P.O. Box 54945 Los Angeles, California 90054		4. Expiration Date Until terminated
		5. Docket or Reference 040-08778
6. Byproduct, Source, and/or Special Nuclear Material	7. Chemical and/or Physical Form	8. Maximum Amount that Licensee May Possess at Any One Time Under This License

A. Natural Thorium	A. Slags and Contaminated Soils and Building Components	A. 18 x 10 ³ kg
B. Natural Uranium	B. Slags and Contaminated Soils and Building Components	B. 218 kg
9. Authorized Use:		
A. For storage, transfer, and decommissioning in accordance with an approved Site Decommissioning Plan.		

CONDITIONS

10. Licensed material shall be stored only at the licensee's facilities located at Caldwell and Green Streets, Washington, Pennsylvania.
11. The licensee shall comply with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Part 19, "Notices, Instructions, and Reports to Workers; Inspections and Investigations," and Part 20, "Standards for Protection Against Radiation."
12. The Site Radiation Safety Officer shall have completed a basic radiation safety course and at least 2 years of work experience in applied radiation protection.
13. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in Items 6, 7, and 8 of this license in accordance with statements, representations, and procedures contained in letters dated November 27, 1973, and January 30, 1974, application dated December 26, 1974, and letters dated July 13, 1976, July 11, 1980, November 19, 1980, August 19, 1992, September 21, 1992, and September 25, 1992. The Nuclear Regulatory Commission's regulations shall govern the licensee's statements in applications or letters, unless the statements are more restrictive than the regulations.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number SMB-1393

Docket or Reference
Number 040-08778

Amendment No. 6

L. Submittal of Site Decommissioning Plan (SDP) - Molycorp, Inc., will submit a SDP to the NRC no later than July 16, 2000. If on site disposal of radioactive waste under the conditions of restricted use is proposed, an environmental report will be submitted by the same date. The SDP will include a decommissioning funding plan (DFP), in accordance with 10 CFR 40.36(a), to cover the estimated cost for the preferred decommissioning approach. The licensee is hereby granted a schedular exemption from the requirement of 10 CFR 40.36(c)(2) for the submittal of a DFP until such time as the SDP is submitted.

13. Pursuant to 10 CFR 20.1401(b) and 40.42(g)(5), the licensee is authorized to decommission those portions of its facility currently contaminated with radioactive material in accordance with the unrestricted release criteria approved by the Commission in the Site Decommissioning Management Plan Action Plan of April 6, 1992, (57 FR 13389). Except as specifically provided otherwise in this license, the licensee shall conduct its decommissioning in accordance with the statements, representations, and procedures contained in: (1) the license application and decommissioning plan dated June 30, 1999; (2) Molycorp, Inc.'s, letter to NRC (Larry Camper) dated April 3, 2000; and (3) Molycorp, Inc.'s, letter to NRC (LeRoy Person) dated May 16, 2000.

The NRC's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive.

A. Prior to excavation of contamination, Molycorp, Inc., shall submit to NRC for review and approval a supplemental characterization and monitoring plan for groundwater, surface water, and sediments. The plan will provide the following information:

1. Radiological characterization of the bedrock unit near the western boundary of the site prior to and after excavation, sufficient to provide evidence that contamination is not migrating off site in the bedrock unit;
2. Updated groundwater, surface water, and sediment monitoring data from previously sampled locations prior to and after excavation, sufficient to establish radiological trends for thorium and uranium and their significant daughter products and to provide assurance that post excavation contamination levels are within acceptable limits; and
3. The planned extent of excavation below the water table and control measures (e.g., engineering controls, waste water management plans, and contamination controls) that will be used to limit migration of radiological contamination. Similar information shall be provided for non-radiological contamination if such contamination is mixed with the radiological contaminants.

B. Prior to excavation of contamination, Molycorp, Inc., shall submit a detailed supplemental characterization plan for NRC review and approval. The supplemental characterization plan should include information from site surveys that establish the equilibrium status of uranium-238, thorium-232, and their daughter products at the Washington site. In the event a total uranium/thorium ratio approach is proposed for estimating total uranium concentration for demonstrating compliance with the unrestricted release criteria, then the survey plan must include the following:

1. Site specific information that supports the uranium to thorium ratio;

**MATERIALS LICENSE
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2. Survey results that demonstrate the U:Th ratios across the site are reasonably homogenous or the applicability of all U:Th ratios to specific survey locations across the site; and
3. Detailed information on survey protocols, instrumentation, and proposed analysis methodologies (e.g., statistics, inferences, and application of sum-of-ratios rule) for survey results that will be necessary to demonstrate compliance with unrestricted release criteria.

If Molycorp, Inc., cannot justify the application of a U:Th ratio approach, then appropriate laboratory techniques should be used to measure uranium concentration in soils directly.

- C. Molycorp, Inc., shall ensure that any soils designated as affected that exist underneath buildings and structures or outside the facility fence will be subject to the same remediation and final survey methods used for affected open land areas;
- D. Prior to conducting any approved decommissioning operations on the Washington site, Molycorp, Inc., shall submit to NRC for review and approval a final set of radiation protection procedures that address compliance with all applicable 10 CFR Part 20 requirements for protection of workers and the public from potential radiological hazards resulting from those decommissioning activities;
- E. One week prior to beginning excavation, Molycorp, Inc., shall inform U.S. Nuclear Regulatory Commission, Region 1 (King of Prussia Office) and the Division of Waste Management;
- F. Molycorp, Inc., is authorized to transfer low-level radioactive waste offsite for disposal at a licensed low-level radioactive waste disposal facility. On site disposal is not authorized by this amendment; and
- G. Molycorp, Inc., will decommission under an alternate decommissioning schedule using a phased approach. The buildings on-site will be demolished and the soils will be characterized to determine an estimated volume of contaminated material. Upon completion of the building demolition and supplemental soil characterization of the facility to verify the estimated volume of contaminated material, Molycorp, Inc., will provide an updated schedule for the completion of the excavation and final status surveys. Molycorp, Inc., will excavate the contaminated soils and transport them off-site to an NRC approved facility and complete decommissioning activities by the end of 2004.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Dated: 05/01/2002 By: /RA/
 Larry W. Camper, Chief
 Decommissioning Branch
 Division of Waste Management
 Office of Nuclear Material Safety
 and Safeguards

ENCLOSURE 2

DOCKET NO.: 040-08778
LICENSE NO.: SMB-1393
FACILITY: MOLYCORP, INC., WASHINGTON, PA
SUBJECT: SAFETY EVALUATION REPORT FOR ISSUANCE OF AMENDMENT NO. 6 TO MATERIALS LICENSE NO. SMB-1393, MOLYCORP, INC., WASHINGTON, PA (TAC #L52054)

1. INTRODUCTION

In a letter dated February 19, 2002, Molycorp, Inc., (the licensee) forwarded an alternate decommissioning schedule for its Washington, PA facility, for U.S. Nuclear Regulatory Commission (NRC) staff review and approval. The licensee's decommissioning plan (DP) was approved for unrestricted release of the Washington site on August 8, 2000 (reference A), using the criteria in the Site Decommissioning Management Plan Action Plan in accordance with 10 CFR 20.1401(b)(3). The original decommissioning schedule in the approved DP proposed the completion of decommissioning activities within 2 years of the date the plan was approved (i.e., August 8, 2002). The proposed alternate decommissioning schedule extends the completion date until the end of 2004. This safety evaluation report (SER) addresses the extension of the approved decommissioning schedule. An earlier and more detailed SER was prepared in conjunction with License Amendment No. 5, which approved the overall decommissioning process (reference B).

NRC has prepared an environmental assessment (EA) (enclosure 3) in conjunction with this SER.

2. BACKGROUND

Between 1964 and 1970, the Molycorp, Inc., Washington facility produced a ferro-niobium alloy from a Brazilian ore (pyrochlore). This ore contained thorium and uranium as accessory metals, however, these radioactive metals were present in quantities sufficient to require Molycorp, Inc., to obtain a radioactive materials license. The first radioactive materials license for the Washington site was issued on December 19, 1963. The current Washington facility license, SMB-1393, extends until the license is terminated. Wastes from the ferro-niobium operation are present on the site in the form of thorium and uranium bearing slag. Some of the slag was used as fill material over various portions of the site. A large portion of slag, located in a stabilized, soil-capped pile on the southern portion of the site, was excavated and shipped off site to a NRC approved facility. In addition, contaminated material in a number of roll-off boxes was also shipped off-site to a NRC approved facility, leaving no above ground contaminated material at the site.

3. SAFETY EVALUATION

A SER concerning the decommissioning of the Molycorp, Inc., Washington facility was prepared by the NRC staff in August 2000. The SER for the decommissioning evaluated: (1) the task management organization for the decommissioning operations; (2) the licensee's radiation protection program; (3) the licensee's record of compliance with NRC regulations; and (4) physical security for the radioactive material during decommissioning operations. Also, the radiological status of the buildings, equipment, soils, surface water, sediments and groundwater were addressed. Based on this evaluation, the NRC staff determined that the licensee had provided an adequate program and basis for carrying out safe decommissioning operations, and that the decommissioning could be carried out in accordance with the NRC's regulations. In addition, the environmental assessment performed in parallel with this August 2000, SER

concluded that the decommissioning activities will not result in a significant adverse impact on the environment (reference C).

Molycorp, Inc., has found that a number of buildings overlie contaminated areas which affects the determination of the volume of contaminated material and, therefore, the time it will take to clean up the site. Molycorp, Inc., proposes to decommission under an alternate decommissioning schedule using a phased approach. The buildings on-site will be demolished and the soils will be characterized to determine an estimated volume of contaminated material. Molycorp, Inc., will excavate the contaminated soils and transport them off-site to an NRC approved facility. Molycorp, Inc.,'s proposed alternate decommissioning schedule shows that all decommissioning activities will be completed by the end of 2004. Extending the date for completion of decommissioning is reasonable and does not pose a safety issue.

The removal of all of the above ground contaminated material has reduced the amount of thorium and uranium on-site to about one-half of the original volume. This volume reduction of contaminated material substantially reduces the source term for any potential exposure to on-site workers or the public.

4. STATE CONSULTATION

The PA Department of Environmental Protection (PADEP) was notified of the proposed license amendment and it did not object.

5. CONCLUSIONS

Based on the considerations discussed above, the NRC staff concludes that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed decommissioning activities; and (2) such activities will be conducted in compliance with NRC regulations.

6. REFERENCES

- A. Molycorp, Inc., "Decommissioning Plan for the Washington, Pennsylvania, Facility," Revision 1, June 30, 1999.
- B. U.S. NRC, "Safety Evaluation Report, License Amendment Request Dated July 1995, Concerning the Decommissioning of the Molycorp, Inc., Washington, Pennsylvania Metal Alloy Facility," August 2000.
- C. U.S. NRC, "Environmental Assessment of the Proposed Decommissioning Plan for the Molycorp, Inc., Facility in Washington, Pennsylvania," July 2000.

ENCLOSURE 3

DOCKET NO.: 040-08778
LICENSE NO.: SMB-1393
FACILITY: MOLYCORP, INC., METAL ALLOY FACILITY, WASHINGTON, PA
SUBJECT: ENVIRONMENTAL ASSESSMENT FOR ISSUANCE OF AMENDMENT NO. 6 TO MATERIALS LICENSE NO. SMB-1393, MOLYCORP, INC., METAL ALLOY FACILITY, WASHINGTON, PA (TAC #L52054)

FOREWORD

The U.S. Nuclear Regulatory Commission (NRC) is considering a license amendment (License Amendment No. 6) to approve an alternate decommissioning schedule for Molycorp, Inc., (licensee) at its facility in Washington, PA. The objective of the decommissioning of the Molycorp, Inc., Washington, PA, facility is to remediate radiological constituents to the extent required to allow the NRC to release the property for unrestricted use and terminate the NRC radioactive materials license for the facility (SMB-1393). In connection with the review of this action, NRC staff has prepared a safety evaluation report (SER) (enclosure 2), which evaluates conformance of this action with NRC regulations and regulatory guidance.

An earlier, and more extensive Environmental Assessment (EA), was prepared for License Amendment No. 5 (reference A) and was based on the NRC staff evaluation of the Molycorp, Inc., final decommissioning plan (reference B). The NRC staff determined that all steps in the proposed decommissioning could be accomplished in compliance with the NRC public and occupational dose limits, effluent release limits, and residual radioactive material limits. In addition, the staff concluded that the approval of the decommissioning of the Molycorp, Inc., Washington, PA, facility in accordance with the commitments in NRC license SMB-1393 and the final decommissioning plan would not result in a significant adverse impact on the environment. For more details on the facility description, operating history, radiological status, evaluation of decontamination and dismantlement of structures, evaluation of decontamination of outdoor areas, radiation protection programs, and environmental impacts, see the EA prepared for License Amendment No. 5 (reference A).

1. INTRODUCTION

1.1 Background

Molycorp, Inc., is the current holder of NRC radioactive source materials license SMB-1393 (NRC Docket 040-08778) for the possession of radioactive material resulting from operations at its facility located at 300 Caldwell Ave, Washington, Pennsylvania. License SMB-1393 has been extended until the license is terminated. The license authorizes Molycorp, Inc., to possess at any one time a maximum of up to 120,000 kg (264,554 lb) of thorium and 11,000 kg (24,251 lb) of natural uranium in the form of slags and contaminated soils. The license authorizes storage, transfer, and decommissioning in accordance with an approved decommissioning plan (DP). The DP for the Molycorp, Inc., Washington facility was approved in August 2000. Under NRC's "Action Plan to Ensure Timely Cleanup of Site Decommissioning Management Plan Sites" (SDMP Action Plan) (Federal Register 13389), Molycorp, Inc., has 24 months after the approval of its DP to cleanup the site to unrestricted release levels. Molycorp, Inc., has requested an alternate decommissioning schedule which extends the cleanup period until the end of 2004.

1.2 Purpose and Need for Action

This action is necessary to allow Molycorp, Inc., to complete its decommissioning activities in a timely manner. Molycorp, Inc., will complete the removal of radioactive material attributable to licensed operations, to levels that permit unrestricted use of the site.

1.3 Description of This Action

Molycorp, Inc., is proposing to decommission its facility in a phased approach which will take longer than the 24 month period set in the SDMP Action Plan and the approved DP. Molycorp, Inc., wants to take all of its existing buildings down, then characterize the soil to determine the amount of contaminated material that needs to be removed more accurately. A number of buildings overlie contaminated soil and an accurate assessment of the volume of the soil to be removed cannot be made until the buildings are torn down. Supplemental characterization of the site will help determine the actual volume of contaminated material that needs to be excavated and shipped off-site.

2. DECOMMISSIONING ALTERNATIVES AND IMPACTS

2.1 No Action

The "no-action" alternative would be to require Molycorp, Inc., to cleanup its facility by August 2002. The no-action alternative would result in an accelerated schedule for decommissioning and not allow Molycorp, Inc., to conduct a supplemental characterization of the facility.

2.2 Proposed Action, Allow Alternate Decommissioning Schedule

The proposed action is to allow Molycorp, Inc., to decommission its facility using an alternate decommissioning schedule in a phased approach. The buildings on-site will be demolished first, then a supplemental characterization of the soils will be performed.

3. ENVIRONMENTAL IMPACTS

Radiological and non-radiological impacts are discussed in detail in the EA prepared for the decommissioning of the site in License Amendment No. 5. The proposed action does not change the radiological or non-radiological impacts.

4. AGENCIES AND INDIVIDUALS CONSULTED

In accordance with NRC Memorandum of Understanding with the Pennsylvania Department of Environmental Protection (PADEP), NRC staff has consulted with PADEP in the preparation of this EA.

5. RECOMMENDED LICENSE CONDITION

The license currently requires Molycorp, Inc., to decommission according to the schedule proposed in its DP dated June 30, 1999, which is within 2 years of the date that the DP was approved (i.e., by August 2002). Therefore, License Condition 15 is changed with the addition of a new subpart G which reads as follows:

- G. Molycorp, Inc., will decommission under an alternate decommissioning schedule using a phased approach. The buildings on-site will be demolished and the soils will be characterized to determine an estimated volume of contaminated material. Upon completion of the building demolition and supplemental soil characterization of the facility to verify the estimated volume of contaminated material, Molycorp, Inc., will provide an updated schedule for the completion of the excavation and final status surveys. Molycorp, Inc., will excavate the contaminated soils and transport them off-site to an NRC approved facility and complete decommissioning activities by the end of 2004.

NRC has modified its policy on identifying a specific individual as the Radiation Safety Officer in the license. Therefore, License Condition 12 is changed to read as follows:

- 12. The Site Radiation Safety Officer shall have completed a basic radiation safety course and at least 2 years of work experience in applied radiation protection.

6. CONCLUSIONS

The NRC staff has concluded that there will be no adverse environmental impacts associated with Molycorp, Inc., being granted an alternate decommissioning schedule. Molycorp, Inc., has already removed about one-half of the total amount of contaminated material from the site which greatly reduces the source term for potential exposure to workers, the public, or the environment.

7. REFERENCES

- A. Nuclear Regulatory Commission, "Environmental Assessment of the Proposed Decommissioning Plan for the Molycorp, Inc., Facility in Washington, Pennsylvania," July 2000.
- B. "Molycorp, Inc., Washington, Pennsylvania Facility Decommissioning Plan, Part 1 Revision," June 1999.