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AMS
Docket 42-8778

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Molycorp

Ms. Amy M. Snyder, Senior Project Manager
U.S Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Waste Management and Environmental Protection
Materials Decommissioning Section
Mail Stop T-7E-18
Washington, D.C. 20555-0001

June 28, 2006

Change to Portable Survey Instrument Calibration Frequency
Molycorp Washington, PA Decommissioning Project
License Number SMB 1393

Dear Ms. Snyder:

The June 30, 1999 *Molycorp, Inc. Washington, PA Facility Decommissioning Plan* requires re-calibration of portable survey instruments semi-annually or more frequently if specified by the instrument operating manual and after repairs or maintenance that could have invalidated the instrument's current calibration. This requirement is specified in Section 3.3.11, *Quality Assurance*.

Current industry practice follows the guidance provided in the American National Standard (ANS), *Radiation Protection Instrument Test and Calibration, Portable Survey Instruments* (ANSI N323A). Specifically, this standard requires annual portable survey instrument calibration as well as calibration after any maintenance or adjustment that can affect instrument performance (Section 4.9, *Calibration Frequency*). This ANSI (and calibration frequency) is endorsed by the Nuclear Regulatory Commission (NRC) with specific reference to the standard in NUREG 1575, *Multi-Agency Survey and Site Investigation Manual (MARSSIM)*, Section 6.5.4, *Instrument Calibration*.

The semi-annual portable survey instrument calibration frequency is overly conservative and not in line with current industry practice which follows the guidance in established and accepted standards as well as NRC guidance. Re-calibration of portable survey instruments every six months instead of once a year presents an unnecessary administrative burden and excessive project cost.

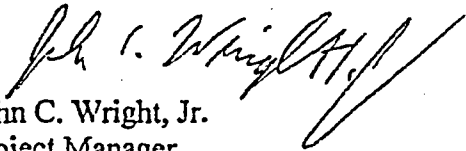
All in-service portable survey instruments are response tested daily or prior to use if the instrument is used intermittently. Response testing is performed in accordance with the above referenced ANSI standard. Project procedures require that any instrument not passing the

response test criteria be removed from service, tagged and sent for repair, maintenance and/or recalibration. Therefore, the operability and confidence in acceptable instrumentation is continually verified. Changing the re-calibration frequency from semi-annual to annual will not result in degradation of instrument performance or a reduction in assurance that the instruments are performing as required.

In light of the above, Molycorp hereby modifies the *Molycorp, Inc. Washington, PA Facility Decommissioning Plan* changing the portable instrument calibration frequency to an annual requirement as specified in NRC guidance and industry standards. This change does not affect air sampling equipment which will retain a semi-annual calibration requirement as specified in project procedures.

Sincerely,

MOLYCORP, INC.

A handwritten signature in cursive script, appearing to read "John C. Wright, Jr.", written in dark ink.

John C. Wright, Jr.
Project Manager