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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

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USNRC

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IN THE MATTER OF

KERR-McGEE CHEMICAL CORPORATION

(West Chicago Rare Earths Facility)

Docket No. 40-2061-ML

KERR-McGEE MOTION FOR LEAVE TO FILE A REPLY

On March 20, 1991, Kerr-McGee Chemical Corporation ("Kerr-McGee") filed a petition seeking review by the Commission of the decision by the Appeal Board in Kerr-McGee Chemical Corp. (West Chicago Rare Earths Facility), ALAB-944 (Feb. 28, 1991). The State of Illinois ("State") and the City of West Chicago ("City") filed oppositions to the Kerr-McGee petition on April 1, 1991. Kerr-McGee now seeks leave to file the attached reply.

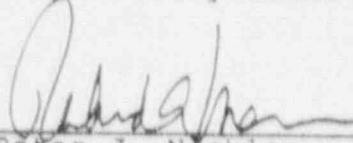
The City and State filings include numerous incorrect statements of fact. Kerr-McGee seeks to reply to the most egregious of these misstatements. The granting of this motion will serve to assure that the Commission is not

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distracted in its consideration of the Appeal Board's decision
by misunderstanding of the facts.

Respectfully submitted,



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