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Counsel To The Firm  
Stuart E. Savage

Of Counsel  
Robert W. Mandell

October 28, 1999

Administrative Judge Charles Bechhoefer  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

VIA FEDERAL EXPRESS

In Re: Matter of Molycorp, Inc.  
Docket Numbers 40-8794-MLA and 40-8778-MLA

Dear Judge Bechhoefer:

This law firm represents Canton Township, Pennsylvania, which has requested a hearing before the Nuclear Regulatory Commission in the above referenced matter. The City of Washington has also requested a hearing in this matter.

The predecessor Administrative Judge in this matter, Peter B. Bloch, by Order dated August 25, 1999 ordered that Petitioners Canton Township and the City of Washington file amendments to their respective Requests for Hearing in this matter. By his same August 25 Order, Judge Bloch provided that the parties may jointly petition for suspension of the schedule pending active negotiation. The parties hereto have previously requested an extension of the schedule and by Order dated September 15, 1999, Judge Bloch extended the Petitioners' time to amend their Requests for Hearing until November 1, 1999. In his September 15 Order, Judge Bloch also noted that the parties may request further extension as appropriate.

Canton Township, the City of Washington and Molycorp, Inc. have authorized me to advise you that negotiations are continuing among the parties, and documents the Petitioners have requested from Molycorp are still being reviewed. The parties hereby request a further extension of time until November 15, 1999 by which the Petitioners must file amendments to their respective Requests for Hearing. As negotiations and document review are ongoing, further requests for extension of time may be forthcoming.

Administrative Judge Charles Bechhoefer  
October 28, 1999

Page Two

If appropriate, this request/stipulation can be filed with your office and with the Nuclear Regulatory Commission as a formal document. However, Judge Bloch has previously honored this type of informal expression of the parties' intent. Please advise if you require a formal stipulation.

Thank you for your assistance in this regard.

Very truly yours,



SAMUEL R. GREGO

SRG:tr

cc: See attached Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served this date on the following by first-class mail, postage prepaid:

Dr. Richard F. Cole  
Special Assistant  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and  
Adjudications Staff

Molycorp, Inc.  
350 N. Sherman Street  
York, PA 17403  
Attention: Mr. John Daniels  
Licensee

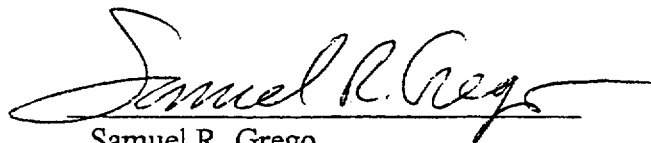
John T. Olshock, Esquire  
Solicitor for Canton Township  
96 N. Main Street  
Washington, PA 15301

Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Randolph T. Struk, Esquire  
Thorp, Reed & Armstrong, L.L.P.  
One Riverfront Center  
Pittsburgh, PA 15222  
Counsel for Licensee Molycorp, Inc.

Jeffrey A. Watson, Esquire  
Smider & Watson, P.C.  
138 N. Franklin Street  
Washington, PA 15301  
Counsel for City of Washington

Date: October 28, 1999



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October 11, 1999

Randolph T. Struk, Esquire  
THORP, REED & ARMSTRONG, LLP  
One Riverfront Center  
Pittsburgh, PA 15222

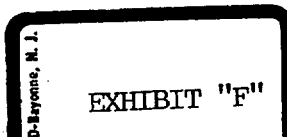
In Re: Molycorp, Inc. - Canton Township

Dear Mr. Struk:

I propose that we and our respective clients' representatives meet at some time next Tuesday - Thursday (October 19-21, 1999). If agreeable to you, we are willing to meet at the Molycorp facility or at the Canton Township Municipal Building.

I was surprised to discover that the Township has not yet received certain basic information and documents relevant to these Molycorp matters. To be adequately prepared for next week's meeting and future meetings, we hereby request on behalf of Canton Township a copy of the following documents:

1. Source Materials License No. SMB-1393.
2. Site Decommissioning Plan for Molycorp's Washington facility (original and any amendments or revisions thereto).
3. Decommissioning Plan for Molycorp's York facility (original and any amendments or revisions thereto).
4. License Amendment Request and related reports.
5. Environmental Impact Studies issued pursuant to all Decommissioning Plans and the License Amendment Request.
6. All correspondence to and from the NRC relating to all Decommissioning Plans and the License Amendment Request.



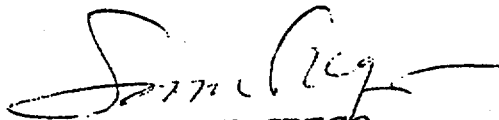
Randolph T. Struk, Esquire  
October 11, 1999

Page Two.

7. The Molycorp plant map (Washington facility) referred to at the September 29 NRC meeting.

These documents should be forwarded to my attention at our office. Please advise if you anticipate any delay in forwarding such documents. I will await your suggestions as to possible meeting dates and times next week.

Sincerely yours,



SAMUEL R. GREGO

SRG:smm

cc: Chad Smith  
John T. Olshock, Esquire  
bcc: Samuel P. Kamin, Esq.

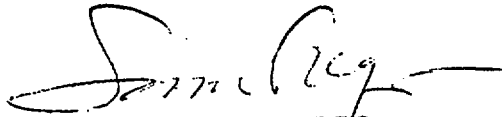
Randolph T. Struk, Esquire  
October 11, 1999

Page Two.

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Sincerely yours,



SAMUEL R. GREGO

SRG:mmm

cc: Chad Smith  
John T. Olshock, Esquire  
bcc: Samuel P. Kamin, Esq.



CERTIFICATE OF SERVICE

I hereby certify that the original and/or a copy of the foregoing Amendment to Request for Hearing by Canton Township, Pennsylvania has been served this date on the following in the following manner, which service complies with the rules and regulations of the U.S. Nuclear Regulatory Commission:

VIA FEDERAL EXPRESS:

Administrative Judge Charles Bechhoefer  
Presiding Officer  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

VIA FIRST-CLASS MAIL:

Dr. Richard F. Cole  
Special Assistant  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and  
Adjudications Staff

Office of Commission  
Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Lawrence J. Chandler, Esquire  
Office of General Counsel  
Mail Stop 0-15 D21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

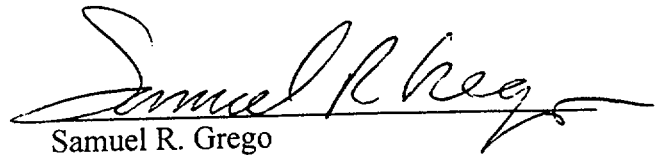
Molycorp, Inc.  
300 Caldwell Ave.  
Washington, PA 15301  
Attention: Mr. John Daniels  
Licensee

Randolph T. Struk, Esquire  
Thorp, Reed & Armstrong, L.L.P.  
One Riverfront Center  
Pittsburgh, PA 15222  
Counsel for Licensee Molycorp, Inc.



Jeffrey A. Watson, Esquire  
Smider & Watson, P.C.  
138 N. Franklin Street  
Washington, PA 15301  
Counsel for City of Washington

Date: November 12, 1999



Samuel R. Grego  
GOLDBERG, KAMIN & GARVIN  
1806 Frick Building  
Pittsburgh, PA 15219  
(412) 281-1119  
Special Counsel for Canton Township



'99 NOV 17 P3:55

CERTIFICATE OF SERVICE

I, Jeffrey A. Watson, Esquire, Solicitor <sup>AD</sup> for the City of Washington, hereby certify that the foregoing Amendment to Request for Hearing by the City of Washington, Pennsylvania has been served this date on the following in the following manner, which service complies with the rules and regulations of the U.S. Nuclear Regulatory Commission:

Original and 2 Copies via First Class Mail/Certificate of Mailing:

Secretary, U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attention: Rulemakings and Adjudication Staff

Copies via First Class mail:

Dr. Richard F. Cole  
Special Assistant  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Rulemakings and Adjudication Staff  
Secretary of Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Office of Commission  
Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Lawrence J. Chandler, Esquire  
Office of General Counsel  
Mail Stop P-15D21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Molycorp, Inc.  
300 Caldwell Avenue  
Washington, PA 15301  
Attention: John Daniels  
Licensee

Randolph T. Struk, Esquire  
Thorp, Reed & Armstrong, L.L.P.  
One Riverfront Center  
Pittsburgh, PA 15222  
Counsel for Licensee

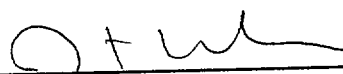
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Pittsburgh, PA 15219  
Special Counsel for Canton Township

John T. Olshock, Esquire  
John T. Olshock & Associates  
96 N. Main Street  
Washington, PA 15301  
Solicitor for Canton Township

Respectfully submitted,

SMIDER & WATSON, P.C.

Date: 11/15/99

  
\_\_\_\_\_  
Jeffrey A. Watson, Esquire  
Solicitors for the City of  
Washington, PA