

4. Even though no danger is posed by the location of the water line on Molycorp's property, as a gesture of goodwill and in an effort to foster community relations, on November 9, 1999, I informed the Township that Molycorp would remove the water line entirely from Molycorp's property.

5. Molycorp has since reached an agreement in principle with the owner of the water line for its removal, and Molycorp anticipates that this work should be completed by the second quarter of the year 2000.

6. During the course of my investigation with the owner of the water line for its removal from Molycorp's property, I was advised that the owner conducted its own testing of the water running through the water line. In this regard, I was advised that the owner has never found any radiological contamination in the water line during any of its testing.

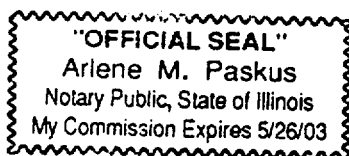
Further affiant sayeth not.



Sworn and subscribed before me
this 24TH day of November, 1999.

Arlene M. Paskus
Notary Public

My Commission Expires: 5/26/03



CERTIFICATE OF SERVICE

'99 DEC -1 P4:41

I, Randolph T. Struk, counsel for Molycorp, Inc., hereby certify that a copy of Molycorp, Inc.'s Response To The Request For Hearing Of The City of Washington Township was served on the 30th day of November, 1999, as follows:

ADJUDICATED

Original and two copies via Federal Express:

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

Copies via Federal Express:

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

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

Dr. Richard F. Cole, Special Assistant
Atomic Safety and Licensing Board Panel
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

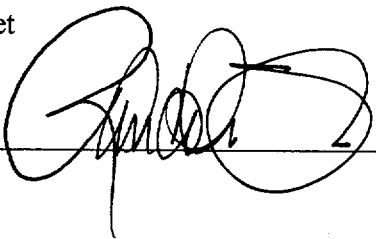
Lawrence J. Chandler, Esq.
Office of General Counsel
Mail Stop 0-15 D21
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Copies Via Regular Mail:

John T. Olshock, Esquire
Solicitor for Canton Township
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Washington, PA 15301

Samuel P. Kamin, Esquire
Goldberg, Kamin & Garvin
1806 Frick Building
437 Grant Street
Pittsburgh, PA 15219-6101

Jeffrey A. Watson, Esquire
Smider & Watson, P.C.
138 North Franklin Street
Washington, PA 15301



A handwritten signature in black ink, appearing to read "Jeffrey A. Watson", is written over a horizontal line. The signature is stylized and cursive.