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1999

U.S. NUCLEAR REGULATORY COMMISSION DEC 27 15:06

LICENSEE: MOLYCORP, INC.
License No. SMB-1393
Docket Nos. 040-08794 and 040-08778
AD

**REPLY OF DEFENDANT, CITY OF WASHINGTON
TO MOLYCORP, INC.'S RESPONSE TO
AMENDMENT TO REQUEST FOR HEARING**

The Petitioner/Requestor, the CITY OF WASHINGTON, by and through its Solicitors, SMIDER & WATSON, P.C., hereby files the following Reply To Molycorp, Inc.'s Response To Amendment To Request For Hearing, and in support thereof states as follows:

1. On or about the 28th day of June, 1999, the City of Washington filed its Request For Hearing in accordance with 10 CFR Part 2, Sec. 2.1205, et seq.

2. On or about June 28, 1999, the Requestor, CANTON TOWNSHIP, also filed its request for hearing with the NRC, within thirty (30) days of the publication of the Notice of Amendment Request filed by MOLYCORP.

3. On or about August 25, 1999, by Order of said date, Administrative Judge Peter Bloch ordered Requestors, CANTON TOWNSHIP and the CITY OF WASHINGTON, to amend their respective Requests for Hearing.

4. Upon joint request by the parties, Judge Bloch subsequently extended the Requestors' filing deadline until November 1, 1999, thereafter MOLYCORP consented to an additional extension of time to November 15, 1999, which agreement was memorialized in a letter dated October 28, 1999, to current Administrative Judge Charles Bechhoefer.

5. That on or about November 12, 1999, Requestor, CANTON TOWNSHIP, filed its Amendment to Request for Hearing by CANTON TOWNSHIP, Pennsylvania. The CITY OF WASHINGTON adopted said pleading as it relates to the CITY OF WASHINGTON.

6. On or about December 9, 1999, CANTON TOWNSHIP filed its Reply Of Defendant CANTON TOWNSHIP To Molycorp, Inc.'s Response To Amendment To Request For Hearing.

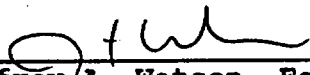
7. In lieu of filing an Additional Reply Of Defendant CITY OF WASHINGTON To Molycorp, Inc.'s Response To Amendment To Request For Hearing, the CITY OF WASHINGTON hereby incorporates by reference all of the averments and statements set forth in the Reply Of Defendant CANTON TOWNSHIP To Molycorp, Inc.'s Response To Amendment To Request For Hearing dated December 9, 1999, as if more fully set forth herein at length, as it relates to the CITY OF WASHINGTON and the residents of the CITY OF WASHINGTON.

WHEREFORE, the Petitioner/Requestor, the CITY OF WASHINGTON,

hereby respectfully requests a hearing before the U.S. Nuclear
Regulatory Commission on the pending Amendment Request of Licensee
Molycorp, Inc.

Respectfully submitted,

SMIDER & WATSON, P.C.



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

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA

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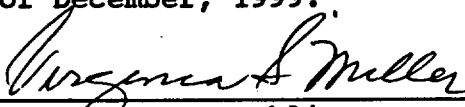
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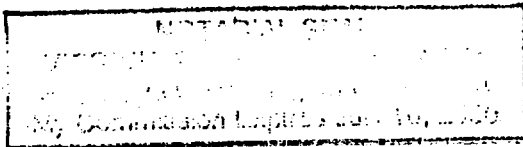
COUNTY OF WASHINGTON

I, CATHY V. VOYTEK, state that I am the City Clerk of the City of Washington, that I am authorized to make this Affidavit on behalf of the City of Washington, and that the facts set forth in the foregoing Reply Of Defendant City Of Washington To Molycorp, Inc.'s, Response To Amendment To Request For Hearing are true and correct Upon my personal knowledge as to a part and upon information and belief as to the remainder.


CATHY V. VOYTEK

SWORN TO AND SUBSCRIBED
before me this 22nd day
of December, 1999.


Notary Public



CERTIFICATE OF SERVICE

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I, Jeffrey A. Watson, Esquire, Solicitor for the City of Washington, hereby certify that the original and/or a copy of the foregoing Reply Of Defendant City Of Washington To Molycorp, Inc.'s, Response To Amendment To Request For Hearing 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 One (1) Copy Via First Class Mail:

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

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

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 Adjudication Staff

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

John T. Hull, Esquire
U.S. Nuclear Regulatory Commission
Mail Stop 0-15 D21
Washington, D.C. 20555

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

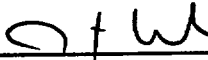
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Special Counsel for Canton Township

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: 12-21-98



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