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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

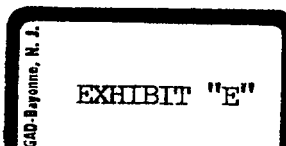
In Re: Matter of Molycorp, Inc.
Docket Numbers 40-8794-MLA and 40-8778-MLA

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

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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

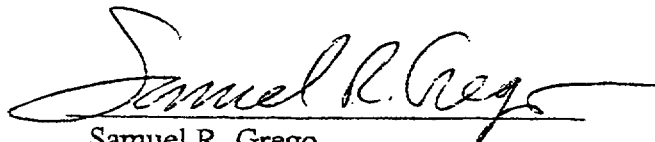
John T. Olshock, Esquire
Solicitor for Canton Township
96 N. Main Street
Washington, PA 15301

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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Robert W. Mandell

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.

EXHIBIT "F"

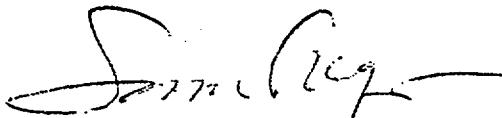
Randolph T. Struk, Esquire
October 11, 1999

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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.


AFFIDAVIT

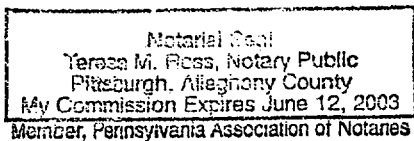
COMMONWEALTH OF PENNSYLVANIA))
COUNTY OF WASHINGTON)) SS:

I, CHAD SMITH, state that I am a member of the Board of Supervisors of Requestor Canton Township, that I am authorized to make this Affidavit on behalf of Canton Township, and that the facts set forth in the foregoing 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.


CHAD SMITH

SWORN TO AND SUBSCRIBED
before me this 12th day
of November, 1999.


Notary Public



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
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Office of Commission
Appellate Adjudication
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Washington, D.C. 20555-0001

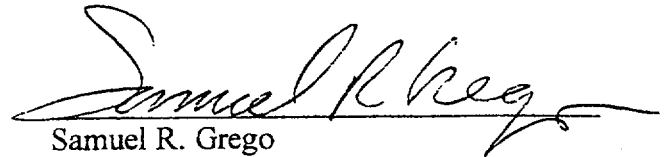
Lawrence J. Chandler, Esquire
Office of General Counsel
Mail Stop 0-15 D21
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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



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Special Counsel for Canton Township