

**Molycorp, Inc.**  
Washington Remediation Project  
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## *Molycorp*

February 23, 2006

Dr. Thomas G. McLaughlin  
Project Manager, Division of Waste Management  
U.S. Nuclear Regulatory Commission  
Mail Stop T-7E18  
Washington, DC 20555-0001

**Subject: Decommissioning Safety Organization  
Washington, PA Remediation Project  
License No. SMB-1393**

Dear Dr. McLaughlin:

Molycorp is about to embark upon remediation activities to complete radiological and non-radiological decommissioning of the Washington Site. To that end, Malcolm Pirnie, Inc. has been engaged to serve as the Remediation Construction Manager; Shaw Environmental, Inc. has been selected as the Remediation Construction Contractor; and US Ecology will be the primary transporter and disposer of exported radiological material from the site.

A Decommissioning Project Safety Organization Chart for the Washington Remediation Project is enclosed with this letter. Descriptions of the responsibilities of the positions shown on the organization chart are given below.

### **1.0 Molycorp Corporate Management**

Molycorp Corporate Management has overall responsibility for all aspects of the Washington Remediation Project. This includes conformance with the site's Materials License requirements and preparation of the termination of license request to the U.S. Nuclear Regulatory Commission (NRC) upon completion of the site decommissioning activities.

### ***1.1 Molycorp Project Manager***

The Molycorp Project Manager (MPM) will function as the Molycorp, Inc. representative for the remediation project and will provide oversight for all project activities. The MPM will be located on-site for the duration of the project and is responsible for ensuring that the Molycorp Remediation Project activities meet the established environmental, health and safety, quality assurance requirements, technical performance, and budgeting and scheduling criteria. The MPM may stop any activity he believes may be unsafe or in violation of a regulatory requirement.

### ***1.2 Molycorp Radiation Safety Officer (RSO)/ Assistant Project Manager***

The RSO will report to the Molycorp Project manager and will be responsible for the radiological health and safety of all activities involving radioactive materials. The RSO may also review qualifications of personnel designated for certain positions in the Remediation Management Organization. In addition, the RSO will review implementation and documentation of all work activities involving radioactive material which may include survey, dosimetry, perimeter air monitoring, compliance issues, instrumentation, audits, data interpretation, training, wastes, shipping and receiving, decommissioning, decontamination, and emergency response. The RSO will be authorized to stop any operation that is unsafe or is in violation of a regulatory requirement.

The RSO can delegate duties to qualified personnel (e.g., Assistant RSO), as needed.

## **2.0 Remediation Construction Manager – Malcolm Pirnie (MPI)**

The Remediation Construction Manager (RCM) is responsible for development and implementation of the remediation approach. The RCM will be assigned to the site full-time and will have authority to make necessary corrective changes to the Remediation Construction Contractor's work and to stop any activity.

RCM responsibilities will include the following:

- Coordination, planning, and management of remediation activities
- Quality assurance and quality control sampling and testing
- Review of shop drawings and Remediation Construction Contractor submittals
- Surveillance and documentation of the overall remediation effort
- Oversight and documentation of tar and radiological material excavation
- Supervision and interpretation of AAR process
- Tracking of excavation quantities
- Monitoring and reporting of Remediation Construction Contractor progress
- Administration of job costs and pay requests
- Oversight of project safety
- Oversight and documentation of permit compliance
- Oversight of transportation and disposal activities

### ***2.1 MPI Project Manager***

The MPI Project Manager has primary responsibility for development and implementation of the remediation approach, and will be the primary point of contact with MolyCorp, Inc. The MPI Project Manager may stop any activity he believes may be unsafe or in violation of a regulatory requirement.

### ***2.2 MPI Field Manager (FM)/Site Safety Officer (SSO)***

The MPI Field Manager (FM)/Site Safety Officer (SSO) will report directly to the MPI Project Manager. The FM will be assigned to the site full-time and will oversee day to day field activities. The FM will have authority to make necessary corrective changes to the Contractor's work and to stop any activity. This includes authority to reject work or materials.

### ***2.3 Assistant RSO/Radiological Engineer***

The Assistant RSO will report to the MPI Project Manager and will ensure that required surveys and sampling are performed in accordance with the Final Status Survey Plan and applicable

written procedures. The Assistant RSO will be responsible for duties delegated by the RSO. The Assistant RSO shall be qualified by a combination of training, education, and experience relative to radiological safety, final status survey sampling, sampling design and radiological measurement techniques, and data interpretation.

#### **2.4    *Lead Health Physics Technician***

The Assistant RSO may designate a Lead Health Physics Technician (LHPT) who will provide job coverage and ensure all necessary sampling and surveys are performed in accordance with appropriate plans and written procedures. The LHPT will perform preliminary review of survey data and analytical results. The LHPT will have suitable experience, education, and training.

### **3.0    Remediation Construction Contractor – Shaw Environmental, Inc.**

The Remediation Contractor is to perform remedial construction activities at the Washington Remediation Site. The work will incorporate various site construction and remediation elements including but not limited to:

- Site preparation/earthwork including construction of access roads, modifications of a rail spur, Transshipment Area construction, as well as material staging, decontamination, and management of excavation areas
- Excavation and loading of radiologically impacted materials
- Concrete/debris demolition and removal
- Utility abandonment and relocation
- Erosion and sediment control
- Handling, treatment, and disposal or re-use of collected stormwater / groundwater and decontamination water
- VOC, odor and dust control
- Excavation structural support and dewatering
- Sheet piling
- Excavation and off-site disposition for remediation of MGP tar areas

- Containment berm construction
- Site restoration, including backfill, topsoil placement, and seeding
- Stream bank enhancements

### ***3.1 Remediation Construction Contractor Project Manager***

The Remediation Construction Contractor will designate a Contractor Project Manager (CPM) who will have overall responsibility for interpreting and planning work as described above, including health and safety, cost, schedule, and materials procurement. The CPM will be the primary point of contact with MolyCorp and MPI. The CPM shall be qualified by a combination of training, education, and experience relative to similar remediation projects.

### ***3.2 Site Manager***

The Remediation Construction Contractor will designate a Site Manager who will direct his personnel to perform work activities in accordance with the plans, specifications, work plans, and safety work permits. The Site Manager reports to the CPM. The Site Manager has the authority to stop any activity that may be unsafe or is in violation of a regulatory requirement. The Site Manager will have appropriate training and experience.

### ***3.3 Remediation Construction Contractor Site Health and Safety Officer***

The Remediation Construction Contractor Site Health and Safety Officer will be responsible for verifying that all Remediation Construction Contractor activities are performed in compliance with the approved Health & Safety Plan.

## **4.0 Radiological Transportation and Disposal Contractor(s) – US Ecology, Inc.**

The Radiological Transportation and Disposal (T & D) Contractor(s) will be responsible for transportation and disposal of radiologically impacted materials that are exported from the site.

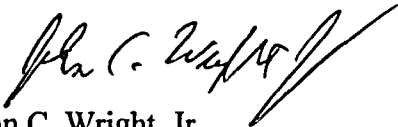
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The T & D Contractor will provide a full-time, on-site Transportation Coordinator who will confirm waste acceptance criteria and complete all necessary documentation to assure compliance with applicable transportation regulations.

If you have any questions please call me at 724-222-5605, or email at [jwright@molycorp.com](mailto:jwright@molycorp.com).

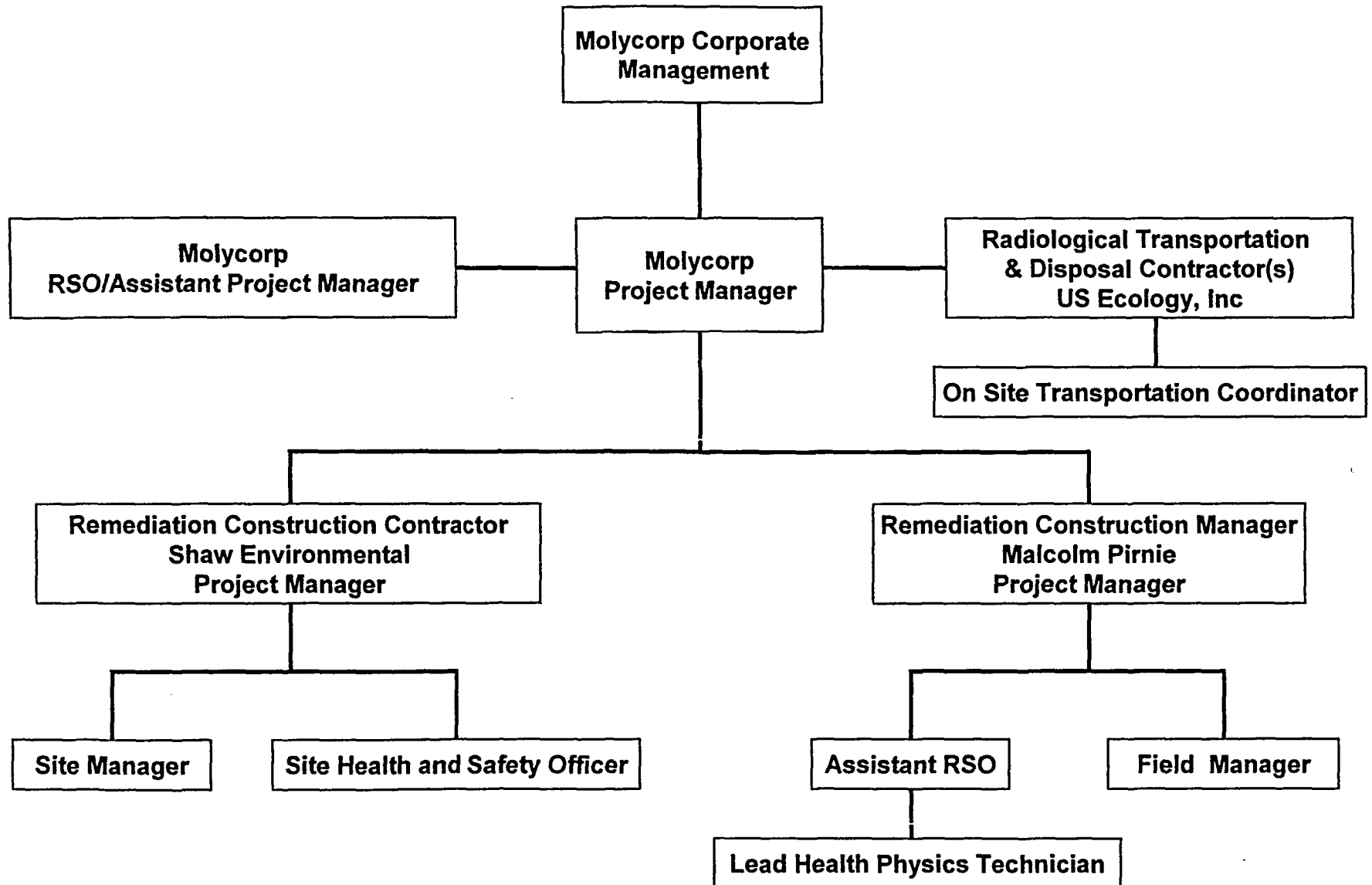
Very truly yours,

**MOLYCORP, INC.**



John C. Wright, Jr.  
Project Manager  
Washington Remediation Project

Attachment—Washington Remediation Project Decommissioning Safety Organization



**Washington Remediation Project Decommissioning Safety Organization**