



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY  
INSTALLATIONS AND ENVIRONMENT  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110

24 JUL 2000

Mr. George Pangburn  
Director  
Division of Nuclear Materials Safety  
Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

Dear Mr. Pangburn:

This letter is in response to your May 30, 2000, letter regarding a preliminary radiological assessment required to determine if the former Frankford Arsenal, Philadelphia, Pennsylvania, meets current Nuclear Regulatory Commission (NRC) guidelines for unrestricted release.

The responsibility for the assessment is being transferred from the Army Material Command to the Formerly Used Defense Sites (FUDS) Program to ensure that this assessment receives the appropriate emphasis. The Army will develop a plan to conduct the required work in fiscal year 2001. The plan will be coordinated with members of your staff, the facility owner and State authorities.

The Corps of Engineers Baltimore District will conduct the assessment. I have asked that they contact members of your staff to schedule a meeting to discuss the plan. The Baltimore District project manager is Mr. Jack Butler and he can be reached at 410-962-4937.

Sincerely,



Raymond J. Fatz  
Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA (I&E)

cc: Commonwealth of Pennsylvania (ATTN: Ms. Denise K. Chamberlain)

ACQUISITION AND  
TECHNOLOGY

## OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3000

24 FEB 1998

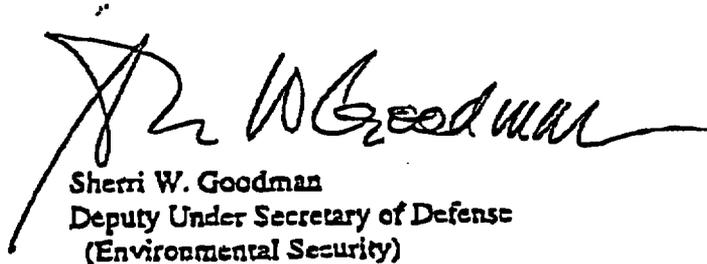
MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY  
(Environment, Safety and Occupational Health) OASA (IL&E)SUBJECT: Policy Determination on Former Frankford Arsenal for Inclusion in the Formerly  
Used Defense Sites (FUDS) Program

This memorandum responds to your memorandum dated December 22, 1997, requesting our approval to include the former Frankford Arsenal in the FUDS program.

We have reviewed the issues in this case and have concluded the following:

- the former Frankford Arsenal appears to be eligible for inclusion as a FUDS and the Corps of Engineers should prepare an Inventory Project Report (INPR) to formally determine whether Frankford is a FUDS eligible property;
- the Nuclear Regulatory Commission (NRC) is acting within their authority when asking us to reevaluate the property in light of new regulations;

Upon completion of the INPR, the Corps of Engineers should add this property to its inventory and develop a project(s) to address the actions required by the new NRC regulations. This project should be funded from existing FUDS resources.



Sherri W. Goodman  
Deputy Under Secretary of Defense  
(Environmental Security)

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**D R A F T**

CENAB-EN-HN (200-1c)

MEMORANDUM FOR Commander, North Atlantic Division,  
ATTN: CENAD-PP-PM (Ms. Barry)

SUBJECT: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), Addendum No. 2 to Inventory Project Report (INPR) for Site No. C03PA0042, Frankford Arsenal, Philadelphia, Philadelphia County, Pennsylvania

1. We have enclosed the subject addendum to the initial INPR with Findings and Determination of Eligibility signed 3 March 1988 and to Addendum No. 1 dated 7 February 1994.
2. Through the subject addendum, we are proposing a NOFA HTRW (radiological) project. Neither the initial INPR nor Addendum No. 1 addressed any remaining potential radiological hazards at the site because the property had previously been cleared in 1981 for unrestricted use following a decontamination/cleanup program for radiological, heavy metals, and explosive residues on various specified areas such as buildings, outside areas, sumps, vents, and sewers.
3. By letter dated 23 January 1998, the Nuclear Regulatory Commission (NRC) stated that the former Frankford Arsenal site may now not meet current NRC criteria for release for unrestricted use. An HTRW (radiological) project at the site is, however, ineligible under the DERP-FUDS due to policy criteria of paragraph Q.3.d.(8) of the Management Guidance for the Defense Environmental Restoration Program issued by the Office of the Deputy Under Secretary of Defense (Environmental Security) in March 1998. That document defines a FUDS at which a DoD component has already initiated restoration activities to be ineligible for project activities under the DERP-FUDS. This addendum therefore addresses the ineligibility under the DERP-FUDS of any remaining HTRW (radiological) hazards at the site. A revised Site Survey Summary Sheet with Location and Site Maps are at Encl 1.  
*Copy of  
will be  
submitted  
for approval  
for already  
initiated  
restoration  
activities*
4. As previously determined, the site was formerly used by DOD. There is no change to the Findings and Determination of Eligibility under this addendum.
5. The NRC has requested that an additional investigation be conducted regarding potential radiological concerns at the site. The potential radiological concern is ineligible for investigation under the DERP-FUDS. The Project Summary Sheet for the proposed NOFA HTRW (radiological) project is at Encl 2. A copy of Addendum No. 1 and the initial INPR is at Encl 3.

**D R A F T**

**CENAB-EN-HN**

**SUBJECT: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), Addendum No. 2 to Inventory Project Report (INPR) for Site No. C03PA0042, Frankford Arsenal, Philadelphia, Philadelphia County, Pennsylvania**

6. We recommend no further action under the DERP-FUDS Program regarding the HTRW (radiological) project.

7. The Baltimore District Office of Counsel has reviewed the subject addendum and concurs with the proposed NOFA HTRW (radiological) project..

8. The Baltimore District's point of contact on this matter is Mr. William C. Piccirilli, CENAB-EN-HN, (410) 962-3542.

3 Encls

STANISLAW P. GEMBICKI, JR., P.E.  
Chief, Engineering Division

CF: CEMP-RF (Mr. Gibson)  
CENAB-PP-E (Mr. Butler)

PICCIRILLI/bp/3542/CENAB-EN-HN

LAL/CENAB-EN-HN

PLATT/CENAB-OC

RICCIO/CENAB-EN-H

GEMBICKI/CENAB-EN

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