

**From:** [Seth Hoedl](#)  
**To:** [Wesley Held](#)  
**Subject:** [External\_Sender] Comment to NRC Public Meeting Regarding Regulatory Frameworks for Fusion  
**Date:** Thursday, November 24, 2022 4:50:01 PM

---

Hi Wes,

Thanks again for arranging my remote participation to this meeting.

If I could, I'd like to add a comment for the record that perhaps you could also pass along to the Commissioners.

I think that the October 21, 2022 ACRS letter needs to be carefully, and transparently, addressed for public confidence and trust.

The ACRS letter is a public record that ACRS experts have assessed that (i) a part 30 approach may be insufficient to meet the hazards posed by some future commercial fusion reactors (not near term reactors) and that (ii) NRC staff may have not paid enough attention to some risks posed by these reactors. I think that it is important for long term trust in fusion that the NRC's eventual regulatory framework, and the process of developing that framework, takes into account the ACRS assessment. A perception by the public that the NRC has not given the ACRS assessment a proper account would be detrimental to public trust.

In order to engender such trust, if the NRC chooses to adopt a part 30 approach (I have no reason to question this choice), the NRC needs to justify on the record and in a clear and publicly accessible form: (i) why part 30 is capable of addressing the risks that the ACRS experts identified; or (ii) why those risks are not present for expected fusion licensees. To maximize public trust in this decision, it would be helpful to base these justifications on an assessment that is released to the public, and independent of the industry and other interested stakeholders, who will be inevitably perceived by the public as biased. For example, input, on the record, from DOE experts, the IAEA, and other nuclear regulators, like the UKAEA, would be very helpful.

Thank you for your time.

Best Regards,

Seth Hoedl, Ph.D., J.D.  
President  
Post Road Foundation