

From: [Tom Gurdziel](#)
To: [RulemakingComments Resource](#)
Cc: [Diane Screnci \(She/Her\)](#)
Subject: [External_Sender] Advanced Reactor, Rule 53 Thoughts (Comments Tom #16)
Date: Wednesday, December 04, 2024 8:29:21 PM

Section 53.1109(g)(2)(i)(A) ? ? change "from the facility considering accident likelihood and source term," to "from the facility considering source term," In other words, delete "accident likelihood" since the accident is already occurring at this time.

Section 53.1109(unknown) "The exact configuration of the plume exposure pathway EPZ surrounding the facility shall be determined in relation to the local emergency response needs... As written, this appears to me to provide a substantial excuse against providing an emergency response. This needs to be rewritten so that response is provided to the plume, not reversed (as written.)

Section 53.1120 None of this section makes sense to me. For example: "...or transportation of, atomic weapons or components thereof;" Is this section even necessary?

Section 53.1124(e)(1) "may only be transported to and installed at a site" What about a return trip to the manufacturer if found damaged upon arrival?

Section 53.1124(f) "the Commission will entertain an application for a CP that references a standard design certification issued under this part only if the entity that sponsored the certification supplies the design for the applicant's use." Do you understand what this says, because I don't.

Thank you,

Tom Gurdziel