

06/17/2025

Item: 7A

Neither this CEQA review nor the TerraPhase study (which states several times that many details are not available) present a complete view of specific radiological and industrial hazards of the Pacific Fusion project.

Unlike traditional nuclear fission plants, fusion technology necessitates unique considerations for ensuring worker safety, protecting the public and the environment from potential hazards, and safeguarding against accidents.

Understanding the potential radiological and industrial hazards of fusion energy and the specific hazards of a proposed fusion technology and design is important to creating a regulatory system.

**** These documents have failed to provide:**

- A technology-inclusive definition of the fusion power reactor's hazards and hazard potentials.

- Development of a plan for fusion power specific safety objectives and principles which include:

 - A - Defining the organization's safety priorities that address its most significant safety risks, which it shall apply to the security of facilities and activities.

 - B – Disclosure of appropriate provisions in the design and construction of installations and arrangements for mitigating the consequences of accidents and failures.

 - C - Measures for the security and the management of radioactive sources and radioactive material.

Submitted by Jeffrey Gould
Re: 7-A
6/17/25

**** These documents also fail to characterize a credible fusion power reactor safety case where a technical structured argument, supported by clear evidence, justifies that a fusion system is safe for operation.**

For example: Will monitoring wells be drilled around the facility to detect a potential Tritium release to our VERY shallow island city's water table? .. What measures are to be implemented regarding maintenance of magnetic and neutron shielding?

**** There is no proposal nor a plausible plan for a fusion power reactor framework that allows for the safe development of fusion systems here .. Just promises that ...**

“It will be heavily regulated by the state of California.”

While these goals may seem familiar, they are not covered by the current framework of nuclear safety standards. Simply transplanting existing regulatory paradigms would be inadequate and fail to address the distinctive challenges posed by fusion technology.

The lack of an internationally recognized framework for fusion regulation leaves private fusion developers in a state of uncertainty and grappling with the ambiguity of compliance requirements.

The importance of disclosing fusion definitions and safety principles – ie: developing fusion power-facility specific regulatory frameworks for safety, security and the management of radioactive waste are critical if this project is to proceed here in Alameda.

I urge you to reject the current CEQA evaluation and the ‘third party’ TerraPhase study in lieu of a more through, more complete analysis of this proposed facility.

A handwritten signature in cursive script, reading "Jeffrey Gould". The signature is written in dark ink on a white background.