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Spent Fuel Heat Generation in an Independent Spent Fuel Storage Installation

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RULES & REGULATIONS

General Comment

- 1) Clarify whether Rev. 1 to RG 3.54 is being superseded by Rev. 2. Rev. 1 methodology should remain an acceptable method, but the draft Rev. 2 implies that Rev. 1 is being superseded.
- 2) Rev. 2 methodology seems to be largely based on ANS-5.1-2005 and/or ANS-5.1-2014. If that is correct, then ANS will have to be compensated for publishing their standard in a publicly-available document. Instead, Rev. 2 could just endorse the ANS standard as an acceptable option (while not re-publishing the details of the ANS standard), while retaining the Rev. 1 methodology as another acceptable option.

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