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General Comment

Unclear how this guide can be applicable to passively safe advanced reactors.

For instance, the likely small operating crews are unlikely to be able to field a fire brigade.

The guide should state that it is limited to those water cooled reactors that employ active measures (e.g. pumping water, electrical power) to protect the public from hazardous radiation.

Applicability to passively fail safe advanced reactors should be along the lines of reliance on passive protection measures and automatic mitigation measures. For advanced reactors, the extent of the guide should also be limited to areas housing Safety-Related equipment, including structures and equipment that protect Safety-Related equipment.

Some form of general statement should be included on expectations for fire protection measures associated with passively safe advanced reactors. The statement might merely note that the matter needs further review.