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**Docket:** NRC-2021-0106

Supplemental Guidance for Radiological Consequence Analyses Using Alternative Source Terms

**Comment On:** NRC-2021-0106-0001

Supplemental Guidance for Radiological Consequence Analyses Using Alternative Source Terms

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## Submitter Information

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## General Comment

The ISG advocates an improper use of risk analysis that represents an industry bias and loss of objectivity. The NRC should not misuse risk analysis to advocate for the industry a justification for not fixing MSIVs that leak.