

# PUBLIC SUBMISSION

SUNI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03

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Comment (8)  
Publication Date: 5/21/2021  
Citation: 86 FR 27657

**As of:** 6/22/21 10:09 AM  
**Received:** June 21, 2021  
**Status:** Pending\_Post  
**Tracking No.** kq7-1g6e-9bjz  
**Comments Due:** June 21, 2021  
**Submission Type:** Web

**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

**Document:** NRC-2021-0106-DRAFT-0010

Comment on FR Doc # 2021-10748

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## Submitter Information

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## General Comment

It is improper to change the accident analysis using NRC review guidance such as the proposed ISG. Chapter 15 accident analysis are conservative and are meant to be bounding analysis. Changing the basic premises of the accident analysis using PRA is a technical decision that should be reviewed by the ACRS, a legal decision that should be reviewed by the ASLB, and a policy decision that should be reviewed by the Commission. The NRC should submit a Notation Vote paper to the Commission on this matter.