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Supplemental Guidance for Radiological Consequence Analyses Using Alternative Source Terms

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Supplemental Guidance for Radiological Consequence Analyses Using Alternative Source Terms

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Submitter Information

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General Comment

The proposed ISG is supported by analysis prepared by the NRC staff and does not rely on information submitted by licensees to be incorporated in the plant licensing basis. As such, the ISG is proposing to incorporate information in the licensing basis contrary to 10 CFR 54.3, "Current Licensing Basis," that specifies "...information made in docketed licensing correspondence..." becomes part of the licensing basis. NRC inclusion of risk information, not submitted on the docket, would not become part of the current licensing basis.