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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 NRC is improperly citing the Staff Requirements Memoranda for SECY-98-144 and SECY-19-0036 in justifying relaxation of MSIV requirements. The proposed ISG does not meet the principles for risk-informed changes to the licensing basis in Regulatory Guide 1.174.