

# PUBLIC SUBMISSION

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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-0016

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## Submitter Information

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## General Comment

The ISG lacks citations and references to realistic experimental testing to support the decontamination factors and hold-up of accident fission products. The radiological analysis is contrived. The ISG should not be issued until radiological test data is subject to a public discussion/debate and review by the ACRS.