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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 NRC staff's approach to handling uncertainties in the ISG is deficient in that it only addresses parameter uncertainties. Modeling uncertainties are ignored, altogether, when it is generally known that modeling uncertainties dominate parameter uncertainties in the evaluation of risk.