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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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General Comment

The proposed ISG appears to be an aggressive attack on the regulations intended to protect workers and the public from exposure to radiation. The use of PRA to compensate for licensee's inability to maintain the plant, and barriers to the release of radiation (i.e., MSIVs), seems exceedingly inappropriate, improper, and possibly illegal. Enforcement for failure to maintain MSIVs would seem more appropriate.