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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 ISG improperly accounts for release points and the likelihood that control room dose will be exceeded. The ISG also fails to consider the poor maintenance practices for control room emergency air filtration systems, pre-conditioning of emergency filtration systems to pass surveillance tests, and plant-specific challenges for control room habitability.