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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 staff's approach in the ISG is inappropriately weighted by looking narrowly at the safe shutdown earthquake (SSE) at the exclusion of other initiating events. It is not apparent that control room dose would be met by the NRC staff's rationale in the ISG. The full spectrum of accidents and mitigating systems in Chapters 6 and 15 of the UFSAR should be analyzed. Presumed hold-up characteristics may not be realistic, particularly if human error is considered.