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General Comment

Appendix A, Note #2

The regulatory easing that reduces accounting/protection by one category level for certain fuels if the radiation level exceeds 100 rads/hr is not justified nor supported by technical data. This in essence, allows the fuel to be considered as "self-protecting" and would not require greater levels of physical protection and accountability. This level should be sent at the LD50, which would be technically justified. I believe the LD50 is between 500 and 650 rads/hr at 1 meter.