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General Comment

This comment is in reference to the use of 10 CFR 50.47(b)(10) Planning Standard for NRC Emergency Plan Inspections in determining greater than green findings. Currently, utility General Emergency (GE) default Protective Action Recommendations (PARs) can be problematic for offsite response organizations because they do not always take into account impediments to evacuation. Additionally, default PARs can be overly conservative without any considerations that the risk to the public due to evacuation efforts can sometimes exceed the risk of projected radiation exposure to the public. Specific examples are Hostile Action Based events and scenarios involving spent nuclear fuel pools.

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