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**Sent:** Thursday, October 31, 2019 2:03 PM  
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**Subject:** Comments to support Draft RG Development

Please find attached preliminary comments

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## Comments on New Regulatory Guide for Volcanic Hazards

W.M. Justice

1. Consider developing exclusionary criteria for distance from hazard for missiles initiated from volcanic activity.
2. Consider developing time based evaluations for lava flow from source to nuclear site, including appropriate mitigating measures, both permanently installed and temporary mitigating features (FLEX).
3. Consider developing “early warning indicator” criteria for volcanic events based on geological indicators, similar to early flood indicators for wet nuclear sites.