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10 CFR 50.4

August 28, 2014

Serial: BSEP 14-0086

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324
Renewed License Nos. DPR-71 and DPR-62
Third Six-Month Status Report in Response to March 12, 2012, Commission
Order Modifying Licenses with Regard to Reliable Spent Fuel Pool
Instrumentation (Order Number EA-12-051)

References:

1. Nuclear Regulatory Commission (NRC) Order Number EA-12-051, *Issuance of Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012, Agencywide Documents Access and Management System (ADAMS) Accession Number ML12054A679
2. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012, ADAMS Accession No. ML12221A339
3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"*, Revision 1, dated August 2012, ADAMS Accession No. ML12240A307
4. Duke Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012, ADAMS Accession No. ML12307A020
5. Duke Energy Letter, *Carolina Power and Light Company's Overall Integrated Plans in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013, ADAMS Accession No. ML13086A096
6. Duke Energy Letter, *First Six-Month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 26, 2013, ADAMS Accession No. ML13242A010

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MRR

7. NRC Letter, *Brunswick Steam Electric Plant, Units 1 and 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0973 and MF0974)*, dated November 18, 2013, ADAMS Accession Number ML13269A345
8. Duke Energy Letter, *Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 27, 2014, ADAMS Accession No. ML14073A063
9. NRC Letter, *Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051*, dated March 26, 2014, ADAMS Accession No. ML14083A620

Ladies and Gentlemen,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (i.e., Reference 1) to Duke Energy Progress, Inc. Reference 1 was immediately effective and directs Duke Energy to have a reliable indication of water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (i.e., Reference 2) and an Overall Integrated Plan (OIP) pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (i.e., Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Duke Energy initial status report regarding spent fuel pool instrumentation. Reference 5 provided the Duke Energy OIP.

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. Reference 3 provides direction regarding the content of the status reports. References 6 and 8 provided the first and second six-month status report, respectively, for the Brunswick Steam Electric Plant (BSEP) Unit Nos. 1 and 2.

The purpose of this letter is to provide the third six-month status report pursuant to Section IV, Condition C.2, of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

By letter dated November 18, 2013 (i.e., Reference 7), the NRC provided an Interim Staff Evaluation (ISE) which included a Request for Additional Information (RAI) to BSEP. In accordance with Reference 9, the NRC advised each licensee participating in the audit not to formally submit their RAI responses on the docket, but instead to put their responses and any other supporting information on their ePortals by the date identified in their ISE to support the staff's review process. Response to the RAI will be placed in the BSEP ePortal by the date specified in the BSEP ISE (i.e., by September 30, 2014).

This letter contains no new regulatory commitments.

If you have any questions regarding this submittal, please contact Mr. Lee Grzeck, Manager Regulatory Affairs, at (910) 457-2487.

I declare under penalty of perjury that the foregoing is true and correct, executed on August 28, 2014.

Sincerely,



George T. Hamrick

Enclosure: Third Six-Month Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Victor M. McCree, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
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U. S. Nuclear Regulatory Commission
ATTN: Ms. Michelle P. Catts, NRC Senior Resident Inspector
8470 River Road
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U. S. Nuclear Regulatory Commission
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A) **(Electronic Copy Only)**
11555 Rockville Pike
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Chair - North Carolina Utilities Commission
P.O. Box 29510
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ENCLOSURE

**THIRD SIX-MONTH STATUS REPORT FOR THE IMPLEMENTATION OF ORDER
EA-12-051, ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE SPENT FUEL
POOL INSTRUMENTATION**

BRUNSWICK STEAM ELECTRIC PLANT (BSEP), UNIT NOS. 1 AND 2

DOCKET NOS. 50-325 AND 50-324

RENEWED LICENSE NOS. DPR-71 AND DPR-62

**Third Six-Month Status Report for the Implementation of Order EA-12-051, Order
Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation**

1 Introduction

Brunswick Steam Electric Plant (BSEP) developed an Overall Integrated Plan (Reference 1 in Section 7), documenting the requirements to install reliable spent fuel pool level instrumentation in response to NRC Order EA-12-051. The first six-month update was provided to the NRC on August 26, 2013 (Reference 2 in Section 7). The second six-month update was provided to the NRC on February 27, 2014 (Reference 3 in Section 7). This enclosure provides an update of milestone accomplishments since submittal of the second six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any that occurred during the period from January 28, 2014 to July 31, 2014 (hereafter referred to as "the update period").

2 Milestone Accomplishments

No new milestones were completed during the update period.

3 Schedule Status

There are no changes to the schedule as reported in Reference 1 of Section 7.

4 Changes to Compliance Method

No changes were made during the update period.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

BSEP expects to comply with the order implementation date, and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

There are no open items documented in the OIP or in the Interim Staff Evaluation (ISE). The ISE which was received (Reference 8 in Section 7) included a Request for Additional Information (RAI). Reference 9 instructs that responses to the RAI do not need to be formally submitted on the docket but instead should be placed in the BSEP ePortal. Response to the RAI will be placed in the BSEP ePortal by the date specified in the BSEP ISE (i.e., by September 30, 2014).

7 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Duke Energy Letter, *Carolina Power & Light Company's Overall Integrated Plans in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013, ADAMS Accession No. ML13086A096
2. Duke Energy Letter, *First Six-Month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 26, 2013, ADAMS Accession No. ML13242A010.
3. Duke Energy Letter, *Second Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 27, 2014, ADAMS Accession No. ML14073A063.
4. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012, ADAMS Accession No. ML12054A679.
5. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012, ADAMS Accession No. ML12221A339.
6. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"*, Revision 1, dated August 2012, ADAMS Accession No. ML12240A307.
7. Duke Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012, ADAMS Accession No. ML12307A020.

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Enclosure

8. NRC letter, *Brunswick Steam Electric Plant, Units 1 and 2 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0973 and MF0974)*, dated November 18, 2013, ADAMS Accession No. ML13269A345
9. Duke Energy Letter, *Response to Request for Additional Information Regarding Overall Integrated Plan Submitted in Response to the Commission Order Modifying Licenses With Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated July 22, 2013, ADAMS Accession No. ML13219B117