



Brunswick Nuclear Plant
P.O. Box 10429
Southport, NC 28461

MAY 06 2013

10 CFR 50.73

Serial: BSEP 13-0047

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

Subject: Brunswick Steam Electric Plant, Unit No. 2
Docket Nos. 50-324
Licensee Event Report 2-2013-001

In accordance with the Code of Federal Regulations, Title 10, Part 50.73, Duke Energy Progress, Inc., formerly known as Carolina Power and Light Company (CP&L) submits the enclosed Licensee Event Report (LER). This report fulfills the requirement for a written report within sixty (60) days of a reportable occurrence.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager – Regulatory Affairs, at (910) 457-2487.

Sincerely,

John A. Krakuszeski
Plant Manager
Brunswick Steam Electric Plant

MAT/mat

Enclosure: Licensee Event Report

IE22
NRC

cc (with enclosure):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Victor M. McCree, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U. S. Nuclear Regulatory Commission
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11555 Rockville Pike
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APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013
 Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

1. FACILITY NAME Brunswick Steam Electric Plant (BSEP), Unit 2	2. DOCKET NUMBER 05000324	3. PAGE 1 of 3
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4. TITLE
Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 1

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
03	07	2013	2013	001	00	05	06	2013	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE 5	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)									
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
10. POWER LEVEL 000	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER						
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A						

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME Mark Turkal, Lead Engineer - Licensing	TELEPHONE NUMBER (Include Area Code) (910) 457-3066
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On March 7, 2013, Unit 2 implemented the guidance of EGM 11-003, Revision 1, "Enforcement Guidance Memorandum on Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations With a Potential for Draining the Reactor Vessel," dated December 20, 2012. Consistent with EGM 11-003, Revision 1, secondary containment operability was not maintained during Operations With a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Action C.1 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," was not completed. EGM 11-003, Revision 1, was implemented four additional times during the 2013, Unit 2 refueling outage. These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by the plant's TSs.

Implementation of EGM 11-003, Revision 1, during the Unit 2 refueling outage was a planned activity. As such, there was no root cause evaluation of the event. Consistent with the guidance provided in EGM 11-003, Revision 1, BSEP will submit a license amendment request to adopt a Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue within four months after the issuance of the Notice of Availability of the TSTF traveler.

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Brunswick Steam Electric Plant (BSEP), Unit 2	05000324	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 of 3
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NARRATIVE

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

Introduction

Initial Conditions

At the time of the event, Unit 2 was in Mode 5, at 0 percent of rated thermal power (RTP).

Reportability Criteria

On March 7, 2013, Unit 2 implemented the guidance of EGM 11-003, Revision 1, "Enforcement Guidance Memorandum on Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations With a Potential for Draining the Reactor Vessel," dated December 20, 2012. Consistent with EGM 11-003, Revision 1, secondary containment [NG] operability was not maintained during Operations With a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Action C.1 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," was not completed. EGM 11-003, Revision 1, was implemented four additional times during the 2013 Unit 2 refueling outage. These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by the plant's TSs.

Event Description

On December 20, 2012, the NRC issued EGM 11-003, Revision 1. EGM 11-003, Revision 1, provides generic enforcement discretion to allow implementation of specific interim actions as an alternative to full compliance with plant technical specifications related to secondary containment operability during Mode 5 OPDRV activities. To ensure compliance with the interim actions specified in the EGM, BSEP developed plant procedure OSP-12-001, "EGM 11-003 OPDRV Activities." This procedure, which implements compensatory actions that meet or exceed those specified in EGM 11-003, Revision 1, was implemented on five occasions during the 2013, Unit 2 refueling outage. The following list provides the durations of each period during which EGM 11-003, Revision 1, was implemented (i.e., OPDRV activities were in progress with secondary containment inoperable). Unit 2 was in Mode 5 during these periods.

EGM 11-003, Revision 1 Implementation Duration	Start	End
8 hours, 10 minutes	March 7, 2013, at 0130 Eastern Standard Time (EST)	March 7, 2013, at 0940 EST.
9 days, 3 hours	March 8, 2013, at 1320 EST	March 17, 2013, at 1720 Eastern Daylight Time (EDT).
2 days, 21 hours, 5 minutes	March 20, 2013, at 0015 EDT	March 22, 2013, at 2120 EDT
36 minutes	March 24, 2013, at 0458 EDT	March 24, 2013, at 0534 EDT
5 hours, 18 minutes	March 25, 2013, at 0022 EDT	March 25, 2013, at 0540 EDT

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NARRATIVE

Event Cause

Implementation of EGM 11-003, Revision 1, during the Unit 2 refueling outage was a planned activity. As such, there was no root cause evaluation of the event.

Safety Assessment

The safety significance of this event is minimal. As discussed in EGM 11-003, Revision 1, enforcement discretion related to secondary containment operability during Mode 5 OPDRV activities is appropriate because the associated interim actions necessary to receive the discretion ensure an adequate level of safety. To ensure compliance with the interim actions specified in the EGM, BSEP developed plant procedure OSP-12-001. This procedure was implemented for the OPDRV activities during which secondary containment was not operable.

Corrective Actions

BSEP will submit a license amendment request to adopt a Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue, within four months after the issuance of the Notice of Availability of the TSTF traveler.

Previous Similar Events

A review of LERs and corrective action program condition reports for the past three years identified the following previous similar occurrences.

- LER 1-2012-002, dated May 2, 2012, reported implementation of EGM 11-003 during the 2012 Unit 1 refueling outage. The corrective action for LER 1-2012-002 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue, within four months after the issuance of the Notice of Availability of the TSTF traveler. To date, there is not an approved TSTF traveler. As such, the corrective action from LER 1-2012-002 could not be implemented and could not have prevented the condition reported in LER 2-2013-001.
- LER 1-2012-006, dated November 19, 2012, reported an event where an OPDRV activity was in progress on Unit 1 coincident with secondary containment being inoperable. This constituted operation prohibited by Technical Specification (TS) 3.6.4.1 and was reportable in accordance with 10 CFR 50.73(a)(2)(i)(B). The cause of the event reported in LER 1-2012-006 was inappropriate application of guidance in plant procedure 00I-01.01, "BNP Conduct of Operations Supplement."

Implementation of EGM 11-003, Revision 1, during the Unit 2 refueling outage was a planned activity. As such, the action from LER 1-2012-006 is not applicable to the conditions reported in LER 2-2013-001.

Commitments

No regulatory commitments are contained in this report.