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APR 24 2015

10 CFR 50.73

Serial: BSEP 15-0021

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

Subject: Brunswick Steam Electric Plant, Unit No. 2  
Renewed Facility Operating License No. DPR-62  
Docket No. 50-324  
Licensee Event Report 2-2015-001

In accordance with the Code of Federal Regulations, Title 10, Part 50.73, Duke Energy Progress, Inc., submits the enclosed Licensee Event Report (LER). This report fulfills the requirement for a written report within sixty (60) days of a reportable occurrence.

This document contains no regulatory commitments.

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

Sincerely,

William R. Gideon

WRG/mkb

Enclosure: Licensee Event Report

JE22  
NKR

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  
ATTN: Ms. Michelle P. Catts, NRC Senior Resident Inspector  
8470 River Road  
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A) **(Electronic Copy Only)**  
11555 Rockville Pike  
Rockville, MD 20852-2738

Chair - North Carolina Utilities Commission  
P.O. Box 29510  
Raleigh, NC 27626-0510



**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

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 and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [Infocollects.Resource@nrc.gov](mailto: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.

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

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
02	26	2015	2015	001	00	04	24	2015		05000
									FACILITY NAME	DOCKET NUMBER
										05000

<b>9. OPERATING MODE</b>	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)</b>			
5	<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)
	<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)
<b>10. POWER LEVEL</b>	<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**

LICENSEE CONTACT Lee Grzeck, Manager – Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) (910) 457-2487
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b> MONTH:      DAY:      YEAR:
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**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On February 26, 2015, Unit 2 implemented the guidance of EGM 11-003, Revision 2, "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 13, 2013. Consistent with EGM 11-003, Revision 2, secondary containment operability was not maintained during Operations with a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Actions C.1 and C.2 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," were not completed. EGM 11-003, Revision 2, was implemented four additional times during the 2015, 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 2, 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 2, BSEP will submit a license amendment request to adopt a Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler.

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**NARRATIVE**

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

Background

*Initial Conditions*

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

*Reportability Criteria*

On February 26, 2015, Unit 2 implemented the guidance of EGM 11-003, Revision 2, "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 13, 2013. Consistent with EGM 11-003, Revision 2, secondary containment [NG] operability was not maintained during Operations with a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Actions C.1 and C.2 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," were not completed. EGM11-003, Revision 2, was implemented four additional times during the 2015, 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 13, 2013, the NRC issued EGM 11-003, Revision 2. EGM 11-003, Revision 2, 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 2SP-15-101, "Unit 2 EGM 11-003 OPDRV Activities." This procedure, which implements compensatory actions that meet or exceed those specified in EGM 11-003, Revision 2, was implemented on five occasions during the 2015, Unit 2 refueling outage. The following list provides the durations of each period during which EGM 11-003, Revision 2, 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 2  
Implementation Duration**

**Start**

**End**

5 days, 18 hours, 20 minutes

February 26, 2015, at 0830  
Eastern Standard Time (EST)

March 4, 2015, at 0250 EST

1 day, 14 hours, 7 minutes

March 14, 2015, at 2100  
Eastern Daylight Time (EDT)

March 16, 2015, at 1107 EDT

3 hours, 29 minutes

March 17, 2015, at 0345 EDT

March 17, 2015, at 0714 EDT

15 hours, 57 minutes

March 17, 2015, at 1300 EDT

March 18, 2015, at 0457 EDT

2 hours, 39 minutes

March 18, 2015, at 1005 EDT

March 18, 2015, at 1244 EDT

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Event Cause

Implementation of EGM 11-003, Revision 2, 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 2, 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 2SP-15-101. 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 Specification Task Force (TSTF) traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler.

Previous Similar Events

A review of LERs for the past three years identified the following previous similar occurrences.

- LER 1-2014-001, dated May 1, 2014, reported implementation of EGM 11-003 during the 2014 Unit 1 refueling outage. The corrective action for LER 1-2014-001 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue within 12 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 1-2014-001 could not be implemented and could not have prevented the condition reported in LER 2-2015-001.
- LER 2-2013-001, dated May 6, 2013, reported implementation of EGM 11-003 during the 2013 Unit 2 refueling outage. The corrective action for LER 2-2013-001 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 2-2013-001 could not be implemented and could not have prevented the condition reported in LER 2-2015-001.
- 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 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 2, during the 2015, 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 2-2015-001.
- 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

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**NARRATIVE**

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 2-2015-001.

Commitments

No regulatory commitments are contained in this report.