



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 1, 2017

Mr. William R. Gideon, Vice President
Brunswick Steam Electric Plant
Duke Energy Progress, LLC
8470 River Road, SE (M/C BNP001)
Southport, NC 28461

SUBJECT: BRUNSWICK NUCLEAR PLANT, UNIT NOS. 1 AND 2 – PUBLIC NOTICE OF APPLICATION FOR AMENDMENT TO THE RENEWED FACILITY OPERATING LICENSE (EPID L-2017-LLA-0398)

Dear Mr. Gideon:

The enclosed announcement was forwarded to the *Wilmington Star-News* and the *State Port Pilot* for publication. This announcement relates to your application dated November 28, 2017, for amendment to Renewed Facility Operating License Nos. DPR-71 and DPR-62. The proposed amendment would, on a one-time basis, extend the Completion Time for Technical Specification 3.8.1, Required Action D.5, from the current 30 days to 44 days for Emergency Diesel Generator 4, as well as extend the maximum Completion Time of Required Action D.5 associated with discovery of failure to meet Limiting Condition for Operation (LCO) LCO 3.8.1.a or b (i.e., from the current 33 days to 47 days).

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Hon", written in a cursive style.

Andrew Hon, Project Manager
Plant Licensing Branch II
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-324 and 50-325

Enclosure:
Public Notice

cc: Listserv

ENCLOSURE
PUBLIC NOTICE

PUBLIC NOTICE
NRC STAFF PROPOSES TO AMEND OPERATING LICENSE AT THE
BRUNSWICK NUCLEAR PLANT, UNIT NOS. 1 AND 2

The U.S. Nuclear Regulatory Commission (NRC or the Commission) staff has received an application dated November 28, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17332B024), from Duke Energy Progress, LLC (Duke Energy, the licensee), for an exigent amendment to the renewed operating license for Brunswick Steam Electric Plant (BSEP), Units 1 and 2, located in Brunswick County, North Carolina.

The proposed change would, on a one-time basis, extend the Completion Time (CT) for Emergency Diesel Generator 4 (EDG 4) from the current 30 days to 44 days. A commensurate change is also proposed to extend the maximum CT of the Required Action associated with discovery of failure to meet Limiting Condition for Operation (LCO) from the current 33 days to 47 days. In order to minimize risk, consistent with defense-in-depth philosophy, Duke Energy also requested to suspend monthly testing of EDGs 1, 2, and 3 per Surveillance Requirements (SRs) during the proposed extended CTs. Surveillance testing of EDGs 1, 2, and 3 will resume and be completed within 7 days of restoration of EDG 4 operability.

As background, on November 22, 2017 (ADAMS Accession No. ML17326B619), Duke Energy submitted a deterministic emergency license amendment request (LAR) to (1) extend the CTs for Technical Specification (TS) Required Action from 14 days to 30 days; with a commensurate change to extend the maximum CT of the Required Action associated with discovery of failure to meet LCO from 17 days to 33 days and (2) suspend monthly testing of EDGs 1, 2, and 3 per SRs during the proposed extended CTs. The NRC approved that LAR on November 26, 2017 (ADAMS Accession No. ML17328B072) under the emergency provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91(a)(5). As part of that LAR, Duke Energy indicated that an additional extension of the CTs may be required and that, if necessary, a second, risk-informed, exigent LAR would be submitted in a timely manner. Duke Energy's efforts in disassembly, inspection, and repair of EDG 4 have been aggressively and continuously pursued. However, restoration of EDG 4 may not be completed within the currently approved CT (i.e., 0745 hours EST on December 13, 2017). Thus, Duke Energy is requesting an additional 14 day extension to the approved CTs. A commensurate change is also proposed to extend the maximum CTs of the Required Action associated with discovery of failure to meet LCO.

Pursuant to 10 CFR 50.91(a)(6), for amendments to be granted under exigent circumstances, the NRC has made a proposed determination that the LAR involves no significant hazards consideration. The Commission's regulation at 10 CFR 50.91(a)(1) requires that, at the time a licensee requests an amendment, the licensee must provide to the Commission the licensee's analysis about the issue of no significant hazards consideration using the standards in Section 50.92, which concern whether the proposed amendment (1) involves a significant increase in the probability or consequences of an accident previously evaluated; or (2) creates the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involves a significant reduction in a margin of safety. Accordingly, the licensee provided the following information in its letter dated November 28, 2017.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed license amendment provides a one-time 44 day Completion Time allowance in TS 3.8.1, Required Action D.5 for one EDG and a commensurate change to extend the maximum Completion Time of Required Action D.5 (i.e., from the original 17 days to 47 days) and suspension of SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.6. These changes will have no effect on accident probabilities since the EDGs are not considered accident initiators. The proposed Completion Times and surveillance suspension do not require any physical plant modifications. Since no individual precursors of an accident are affected, the proposed amendment does not increase the probability of a previously analyzed event.

The consequences of an evaluated accident are determined by the operability of plant systems designed to mitigate those consequences. The EDGs are backup power to components that mitigate the consequences of accidents. The current TSs normally permit a single EDG to be inoperable for up to 14 days. This is acceptable provided the SUPP [supplemental]-DG is available. The proposed license amendment extends the current Completion Times for EDG 4, on a one-time basis, to no more than a total of 44 days with a corresponding maximum completion time of 47 days. The proposed change does not affect any of the assumptions used in deterministic safety analysis. Likewise, the temporary suspension of SR 3.8.1.2, SR 3.8.1.3 and SR 3.8.1.6 has no impact on any of the assumptions used in deterministic safety analysis. Granting the proposed change will not adversely affect the consequences of an accident previously evaluated.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

Creation of the possibility of a new or different kind of accident requires creating one or more new accident precursors. New accident precursors may be created by modifications of plant configuration, including changes in allowable modes of operation.

The proposed amendment provides a one-time allowance of a 44 day Completion Time for TS 3.8.1, Required Action D.5 and a commensurate change to extend the maximum Completion Time of Required Action D.5 (i.e., from the original 17 days to 47 days). In conjunction, the proposed amendment provides a temporary suspension of SR 3.8.1.2, SR 3.8.1.3,

and SR 3.8.1.6. These changes do not involve a modification or the physical configuration of the plant (i.e., no new equipment will be installed), create any new failure modes for existing equipment, or create any new limiting single failures. The plant equipment considered available when evaluating the existing Completion Times remains unchanged. The extended Completion Times and the temporary suspension of SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.6 will permit completion of repair activities without incurring transient risks associated with performing a dual unit shutdown with the EDG unavailable.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed license amendment provides a, risk-informed, one-time allowance of a 44 day Completion Time for TS 3.8.1, Required Action D.5. A commensurate change is also proposed to extend the maximum Completion Time of Required Action D.5 (i.e., from the original 17 days to 47 days). A deterministic evaluation of the proposed Completion Times demonstrates there is sufficient margin to safety during the extended EDG Completion Time period. During the extended completion times, sufficient compensatory measures including availability of the SUPP-DG will be established to maintain the defense-in-depth design philosophy to ensure the electrical power system meets its design safety function. The SUPP-DG has the capacity to bring an affected unit to cold shutdown, if needed.

The overall risk of not performing SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.6 during the extended Completion Times is minimal and is consistent with defense-in-depth philosophy. The time period of the temporary suspension is short and historical routine performances of SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.6 have demonstrated good performance of the EDGs. The proposed suspension of performing SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.6 is consistent with the philosophy of SR 3.0.3 in that it is based on the consideration of unit conditions and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

Therefore, the proposed amendment does not result in a significant reduction in the margin of safety.

The NRC staff reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The NRC is seeking public comments on this proposed determination that the license amendment request involves no significant hazards consideration. All comments received by

Thursday, December 7, 2017, will be considered in reaching a final determination. The Commission may issue the amendment prior to the expiration of the comment period should circumstances change such that failure to act in a timely way would result, for example, in derating or shutdown of the plant. Should the Commission take action prior to the expiration of the comment period, it will publish in the *Federal Register* a notice of issuance. Before any issuance of the proposed license amendment, the NRC will need to make the findings required by the Atomic Energy Act of 1954, as amended, and NRC's regulations.

If the NRC staff decides in its final determination that the amendment does involve a significant hazards consideration, a notice of opportunity for a prior hearing will be published in the *Federal Register* and, if a hearing is granted, it will be held before the amendment is issued.

Comments on the proposed determination of no significant hazards consideration may be (1) telephoned to Undine Shoop, Chief, Plant Licensing Branch II, Division of Operating Reactor Licensing, Office of Nuclear Reactor Regulation, by collect call to 301-415-2063, or by facsimile to 301-415-2102; (2) e-mailed to Undine.Shoop@nrc.gov; or (3) submitted in writing to the Chief, Rules, Announcements, and Directives Branch, Division of Administrative Services, Office of Administration, Mail Stop: OWFN-2-A13, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. All comments received by close of business on December 7, 2017 (i.e., 7:00 p.m. EST) will be considered in reaching a final determination.

The NRC cautions you not to include identifying or contact information in comment submissions that you do not want to be publicly disclosed in your comment submission. The NRC will post all comment submissions at <http://www.regulations.gov>, as well as enter the comment submissions into ADAMS. The NRC does not routinely edit comment submissions to remove identifying or contact information.

If you are requesting or aggregating comments from other persons for submission to the NRC, then you should inform those persons not to include identifying or contact information that they do not want to be publicly disclosed in their comment submission. Your request should state that the NRC does not routinely edit comment submissions to remove such information before making the comment submissions available to the public or entering the comment into ADAMS.

A copy of the application may be examined electronically through the NRC's ADAMS in the NRC Library at <http://www.nrc.gov/reading-rm/adams.html>, and at the Commission's Public Document Room (PDR), located at One White Flint North, Public File Area O1 F21, 11555 Rockville Pike (first floor), Rockville, Maryland. Persons who do not have access to ADAMS or who encounter problems in accessing the documents located in ADAMS should contact the NRC PDR Reference staff by telephone at 1-800-397-4209, or 301-415-4737, or by e-mail to pdr.resource@nrc.gov.

SUBJECT: BRUNSWICK NUCLEAR PLANT, UNIT NOS. 1 AND 2 – PUBLIC NOTICE OF APPLICATION FOR AMENDMENT TO THE RENEWED FACILITY OPERATING LICENSE (EPID L-2017-LLA-0398) DATED DECEMBER 1, 2017

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