

NRR-DMPSPeM Resource

From: Hon, Andrew
Sent: Tuesday, December 12, 2017 3:54 PM
To: Murray, William R. (Bill) (Bill.Murray@duke-energy.com) (Bill.Murray@duke-energy.com)
Subject: Brunswick Steam Electric Plant, Units 1 and 2, Acceptance Review for License Amendment Request, Re: Performance-Based Fire Protection Alternative for Thermal Insulation Material (EPID: L-2017-LLA-0397)

By letter dated November 15, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17331A484), Duke Energy Progress LLC (the licensee) submitted a license amendment request (LAR) for Brunswick Steam Electric Plant (BSEP), Units 1 and 2. The proposed LAR would revise the BSEP renewed Facility Operating Licenses DPR-71 and DPR-64 previously approved amendment under Title 10, *Code of Federal Regulations* (CFR) 50.48(c) via National Fire Protection Association (NFPA) standard 805. Specifically, BSEP is requesting approval to allow a performance-based method to certain currently-installed thermal insulation materials to be retained and allow future use of these insulation materials in limited applications subject to appropriate engineering reviews and controls, as a deviation from the NFPA 805 Chapter 3, Section 3.3, *Prevention*. The proposed LAR is being submitted in accordance with 10 CFR 50.48(c)(2)(vii), and requests use of a performance-based method fire protection program element.

The purpose of this email is to provide the results of the NRC staff's acceptance review. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the staff to complete its detailed technical review. The acceptance review is also intended to identify whether the LAR has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed the LAR and concluded that it provides technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an assessment regarding the acceptability of the proposed request. However, NRC staff's determination does not preclude the request for additional information as the review proceeds. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite the completion of the acceptance review.

The NRC staff estimates that this LAR will take approximately 160 hours to complete and that the review can be completed within the time period requested by the licensee. These estimates are based on the staff's initial review of the LAR and they could change due to several factors, including requests for additional information and unanticipated addition of scope to the review. If there are emergent complexities or challenges in the review that would cause changes to the initial forecasted completion dates or hours, the reasons for the changes, along with the new estimates, will be communicated to you.

If you have any questions or need to discuss further, please let me know.

Andy Hon, PE

Project Manager (Brunswick Nuclear Plant 1 & 2, Sequoyah Nuclear Plant 1 & 2)

Plant Licensing Branch II-2

Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

301-415-8480

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From: Hon, Andrew

Created By: Andrew.Hon@nrc.gov

Recipients:

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