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March 1, 2018

Serial: BSEP 18-0027

10 CFR 50.90

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Response to Request for Additional Information SNPB-RAI-2 Regarding Request
for License Amendment Regarding Core Flow Operating Range Expansion (CAC
Nos. MF8864 and MF8865)

- References:
1. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Request for License Amendment Regarding Core Flow Operating Range Expansion*, dated September 6, 2016, ADAMS Accession Number ML16257A410
 2. NRC E-mail Capture, *Brunswick Unit 1 and Unit 2 - Request for Additional Information Related to the MELLLA+ LAR (CACs MF8864 and MF8865) (Nonproprietary)*, dated January 5, 2018, ADAMS Accession Number ML18010A051
 3. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Response to Request for Additional Information Regarding Request for License Amendment Regarding Core Flow Operating Range Expansion (CAC Nos. MF8864 and MF8865)*, dated February 5, 2018, ADAMS Accession Number ML18036A665

Ladies and Gentlemen:

By letter dated September 6, 2016 (i.e., Reference 1), Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment revises Technical Specifications (TSs) 3.1.7, 3.3.1.1, 3.4.1, 5.6.5, adds a new TS 5.6.7, and adds a new license condition to Appendix B of the operating license (OL), to support an expansion of the core power-flow operating range (i.e., Maximum Extended Load Line Limit Analysis Plus (MELLLA+)). On January 5, 2018, by electronic mail (i.e., Reference 2), the NRC provided a request for additional information (RAI) regarding the LAR.

Duke Energy's response to the RAI questions, except for NRC Question SNPB-RAI-2, was submitted by letter dated February 5, 2018 (i.e., Reference 3). As discussed with and agreed to by the NRC licensing project manager, Mr. Andrew Hon, NRC Question SNPB-RAI-2 required additional time to develop a response and would be provided no later than March 1, 2018.

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Duke Energy's response to NRC RAI Question SNPB-RAI-2 is provided in Framatome Report ANP-3655P, Revision 0, *Brunswick MELLLA+ CRDA Assessment with Draft Criteria*, a copy of which is provided in Enclosure 1 of this letter. Framatome Report ANP-3655P, Revision 0, provides information considered proprietary to Framatome Inc. (i.e., formerly known as AREVA). A non-proprietary version of Framatome Report ANP-3655P, Revision 0, is provided in Enclosure 2.

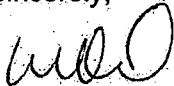
Framatome, as owner of the proprietary information, has executed the affidavit provided in Enclosure 3, which identifies the information as proprietary, is customarily held in confidence, and should be withheld from public disclosure. The proprietary information was provided to Duke Energy in a Framatome transmittal that is referenced by the affidavit.

No regulatory commitments are contained in this letter.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 832-2487.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on March 1, 2018.

Sincerely,



William R. Gideon

WRG/mkb

Enclosures:

1. Framatome Report ANP-3655P, Revision 0, *Brunswick MELLLA+ CRDA Assessment with Draft Criteria* (**Proprietary Information – Withhold from Public Disclosure in Accordance With 10 CFR 2.390**)
2. Framatome Report ANP-3655NP, Revision 0, *Brunswick MELLLA+ CRDA Assessment with Draft Criteria* (Non-Proprietary)
3. Framatome Affidavit Regarding Withholding Framatome Report ANP-3655P, Revision 0, *Brunswick MELLLA+ CRDA Assessment with Draft Criteria*, dated February 22, 2018

cc (with all enclosures):

U.S. Nuclear Regulatory Commission, Region II
ATTN: Ms. Catherine Haney, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U.S. Nuclear Regulatory Commission
ATTN: Mr. Gale Smith, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

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

cc (with enclosures 2 and 3):

Chair - North Carolina Utilities Commission **(Electronic Copy Only)**
4325 Mail Service Center
Raleigh, NC 27699-4300
swatson@ncuc.net

Mr. W. Lee Cox, III, Section Chief **(Electronic Copy Only)**
Radiation Protection Section
North Carolina Department of Health and Human Services
1645 Mail Service Center
Raleigh, NC 27699-1645
lee.cox@dhhs.nc.gov

**Framatome Affidavit Regarding Withholding
Framatome Report ANP-3655P, Revision 0,
Brunswick MELLA+ CRDA Assessment with Draft Criteria,
dated February 22, 2018**

AFFIDAVIT

STATE OF WASHINGTON)
) ss.
COUNTY OF BENTON)

1. My name is Alan B. Meginnis. I am Manager, Product Licensing, for Framatome Inc. and as such I am authorized to execute this Affidavit.
2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.
3. I am familiar with the Framatome information contained in the report ANP-3655P, Revision 0, "Brunswick MELLLA+ CRDA Assessment with Draft Criteria," dated February 2018 and referred to herein as "Document." Information contained in this Document has been classified by Framatome as proprietary in accordance with the policies established by Framatome for the control and protection of proprietary and confidential information.
4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.
5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

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SUBSCRIBED before me this 22

day of February, 2018.

Susan K McCoy

Susan K. McCoy
NOTARY PUBLIC, STATE OF WASHINGTON
MY COMMISSION EXPIRES: 1/14/2020

SUSAN K MCCOY
NOTARY PUBLIC - WASHINGTON
MY COMMISSION EXPIRES 01-14-2020