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MAY 07 2018

10 CFR 50.73

Serial: BSEP 18-0053

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

Subject: Brunswick Steam Electric Plant, Unit No. 1
Renewed Facility Operating License No. DPR-71
Docket No. 50-325
Licensee Event Report 1-2018-001

In accordance with the Code of Federal Regulations, Title 10, Part 50.73, Duke Energy Progress, LLC, 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) 832-2487.

Sincerely,

A handwritten signature in blue ink, appearing to read 'WRG', written over a light blue circular stamp or watermark.

William R. Gideon

WRG/mkb

Enclosure: Licensee Event Report

cc (with enclosure):

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

Chair - North Carolina Utilities Commission **(Electronic Copy Only)**
4325 Mail Service Center
Raleigh, NC 27699-4300
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LICENSEE EVENT REPORT (LER)

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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by 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.

1. Facility Name Brunswick Steam Electric Plant (BSEP), Unit 1	2. Docket Number 05000325	3. Page 1 OF 4
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4. Title
Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

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	2018	2018	- 001	- 00	05	07	2018	Facility Name	05000
									Facility Name	Docket Number 05000

9. Operating Mode **11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)**

5	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)

10. Power Level

000	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<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)(D)	<input type="checkbox"/> 73.77(a)(2)(ii)
	<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)(vii)	<input type="checkbox"/> 73.77(a)(2)(iii)
		<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> Other (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) 832-2487
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13. Complete One Line for each Component Failure Described in this Report

Cause	System	Component	Manufacturer	Reportable to ICES	Cause	System	Component	Manufacturer	Reportable to ICES

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:
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Abstract (Limit to 1400 spaces, i.e., approximately 14 single-spaced typewritten lines)

On March 7, 2018, Unit 1 implemented the guidance of EGM 11-003, Revision 3, "Enforcement Guidance Memorandum 11-003, Revision 3, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel," dated January 15, 2016. Consistent with EGM 11-003, Revision 3, 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 Specifications (TS) 3.6.4.1, "Secondary Containment," were not completed. EGM 11-003, Revision 3, was implemented seven additional times during the 2018, Unit 1 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 TS.

Implementation of EGM 11-003, Revision 3, during the Unit 1 refueling outage was a planned activity. As such, there was no causal evaluation of the event. Consistent with the guidance provided in EGM 11-003, Revision 3, BSEP submitted a license amendment request to the NRC on June 29, 2017, to adopt Technical Specification Task Force (TSTF)-542 associated with generic resolution of this issue.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form
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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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by 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.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Brunswick Steam Electric Plant (BSEP), Unit 1	05000325	2018	- 001	- 00

NARRATIVE

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

Background

Initial Conditions

At the time of the event, Unit 1 was in Mode 5 (i.e., Refuel), at zero percent of rated thermal power (RTP).

Reportability Criteria

On March 7, 2018, Unit 1 implemented the guidance of EGM 11-003, Revision 3, "Enforcement Guidance Memorandum 11-003, Revision 3, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel," dated January 15, 2016. Consistent with EGM 11-003, Revision 3, 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. EGM 11-003, Revision 3, was implemented seven additional times during the 2018, Unit 1 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 January 15, 2016, the NRC issued EGM 11-003, Revision 3, which provides generic enforcement discretion to allow implementation of specific interim actions as alternatives to full compliance with plant TSs 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 1SP-16-100, Revision 1, "Unit 1 EGM 11-003 OPDRV Activities." This procedure, which implements compensatory actions that meet or exceed those specified in EGM 11-003, Revision 3, was implemented on eight occasions during the 2018, Unit 1 refueling outage. The following list provides the duration of the period during which EGM 11-003, Revision 3, was implemented (i.e., OPDRV activities were in progress with secondary containment inoperable). Unit 1 was in Mode 5 during these periods.



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		2018	- 001	- 00

NARRATIVE

EGM 11-003, Revision 3 Implementation Duration	Start	End
0 days, 3 hours, 25 minutes	March 7, 2018 at 0030 Eastern Standard Time (EST)	March 7, 2018 at 0355 EST
1 day, 8 hours, 31 minutes	March 8, 2018 at 1058 EST	March 9, 2018 at 1929 EST
2 days, 4 hours, 22 minutes	March 12, 2018 at 1040 Eastern Daylight Time (EDT)	March 14, 2018 at 1502 EDT
0 days, 4 hours, 0 minutes	March 14, 2018 at 2000 EDT	March 15, 2018 at 0000 EDT
1 day, 7 hours, 21 minutes	March 15, 2018 at 0800 EDT	March 16, 2018 at 1521 EDT
2 days, 8 hours, 19 minutes	March 22, 2018 at 0830 EDT	March 24, 2018 at 1649 EDT
0 days, 3 hours, 14 minutes	March 27, 2018 at 2350 EDT	March 28, 2018 at 0304 EDT
0 days, 4 hours, 57 minutes	March 28, 2018 at 1553 EDT	March 28, 2018 at 2050 EDT

Event Causes

Implementation of EGM 11-003, Revision 3, during the Unit 1 refueling outage was a planned activity. As such, there was no causal evaluation of the event.

Safety Assessment

The safety significance of this event is minimal. As discussed in EGM 11-003, Revision 3, 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 1SP-16-100, Revision 1. This procedure was implemented for the OPDRV activities during which secondary containment was not operable.

Corrective Actions

BSEP submitted a license amendment request to the NRC on June 29, 2017, to adopt TSTF-542, and received approval from the NRC on April 13, 2018. The approved changes will be implemented prior to the 2019 Unit 2 refueling outage.



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Brunswick Steam Electric Plant (BSEP), Unit 1	05000325	2018	- 001	- 00

NARRATIVE

Previous Similar Events

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

- LER 2-2017-001, dated May 18, 2017, reported implementation of EGM 11-003 during the 2017, Unit 2 refueling outage. The corrective action for LER 2-2017-001 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue within 12 months of its approval (i.e., from 12/20/2016).
- LER 1-2016-003, dated May 2, 2016, reported implementation of EGM 11-003 during the 2016, Unit 1 refueling outage. The corrective action for LER 1-2016-003 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.
- LER 2-2015-001, dated April 24, 2015, reported implementation of EGM 11-003 during the 2015, Unit 2 refueling outage. The corrective action for LER 2-2015-001 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.

Commitments

No regulatory commitments are contained in this report.