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March 26, 2019

Serial: RA-19-0157

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
Supplement to Request for License Amendment Technical Specification 3.8.3,
*Diesel Fuel Oil, One-Time Extension of Main Fuel Oil Storage Tank Completion
Time*

Reference: Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory
Commission Document Control Desk, *Request for License Amendment
Technical Specification 3.8.3, Diesel Fuel Oil, One-Time Extension of Main Fuel
Oil Storage Tank Completion Time*, dated April 25, 2018, ADAMS Accession
Number ML18121A366

Ladies and Gentlemen:

On April 25, 2018 (i.e., Reference), 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 change revises an existing Note to allow, on a one-time basis, the main fuel oil storage tank to be inoperable for up to 14 days for the purpose of performing required inspection, cleaning, and any necessary repair activities.

In support of the LAR, Duke Energy commits to the compensatory actions contained in Enclosure 1 of this submittal. Additionally, the proposed Note is revised to reference this submittal and indicate that use of the Note is contingent upon meeting these compensatory actions. Enclosures 2 and 3 provide the existing TS pages, for Units 1 and 2, marked-up to show the proposed change. Enclosures 4 and 5 provide revised (i.e., typed) TS pages for Units 1 and 2. There are no TS Bases revisions necessary to support the proposed changes.

Duke Energy has determined that the information provided in this submittal does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards determination previously submitted. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared for the proposed amendment.

Please refer any questions regarding this submittal to Mr. Art Zaremba, Director – Nuclear Fleet Licensing, at (980) 373-2062.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
March 26, 2019.

Sincerely,



William R. Gideon

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Enclosures:

1. Regulatory Commitments
2. Proposed Technical Specification Changes (Mark-Up) - Unit 1
3. Proposed Technical Specification Changes (Mark-Up) - Unit 2
4. Revised (Typed) Technical Specification Pages - Unit 1
5. Revised (Typed) Technical Specification Pages - Unit 2

cc:

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Regulatory Commitments	
Commitment Description	Due Date / Event
1. Fuel oil removed from the main fuel oil storage tank will be maintained in temporary, onsite storage. This will ensure that a full seven-day fuel oil supply for each required diesel is available onsite.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
2. Plant procedures will be developed to transfer fuel oil from the temporary, onsite storage to the 4-day fuel oil storage tanks should the need arise.	Prior to application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
3. If electric transfer pumps are used, they will be powered by an EDG supplied electrical bus or a separate generator versus the plant electrical system.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
4. BSEP will maintain on-site adequate inventory of diesel fuel oil to refill the diesel-driven fire pump fuel oil supply tank to meet a minimum time exposure window of 36 hours.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
5. Plant procedures will be developed to transfer fuel oil from the temporary, onsite storage to the diesel-driven fire pump fuel supply storage tank should the need arise.	Prior to application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
6. Adequate barriers to prevent any fire associated with the repair (i.e., welding, hot surfaces, and volatile gases) from propagating to the diesel fuel oil 4-day tank or headers will be provided.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
7. Elective maintenance and testing, that affects Emergency Diesel Generator operability, will not be permitted.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
8. Elective switchyard activities and other elective on-site electrical maintenance that could cause any unstable offsite or on-site power conditions will not be scheduled.	During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.
9. Removal of the main fuel oil storage tank from service will not be permitted when severe weather is forecast for the area or if there is a foreseen need for EDG operation.	Prior to application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.

<p>10. Restoration of the main fuel oil storage tank will be pursued in an expeditious manner if long-term Emergency Diesel Generator operation is required.</p>	<p>During application of the one-time Completion Time extension to support main fuel oil storage tank inspection, cleaning, and repair activities.</p>
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Proposed Technical Specification Changes (Mark-Up)
Unit 1

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

LCO 3.8.3 The stored diesel fuel oil shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTES-----

1. Separate Condition entry is allowed for each DG.
2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than ~~December 31, 2008~~ June 1, 2020. This allowance is contingent upon meeting the compensatory measures contained in Duke Energy letter RA-19-0157.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One or more required DGs with fuel oil level in the associated day fuel oil storage tank(s) $< 22,650$ gal per required DG and $\geq 17,000$ gal per required DG.</p> <p><u>AND</u></p> <p>Fuel oil level in the main fuel oil storage tank $\geq 20,850$ gal per required DG.</p>	<p>A.1 Restore required day fuel oil storage tank level to within limit.</p>	<p>48 hours</p>

(continued)

Proposed Technical Specification Changes (Mark-Up)
Unit 2

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

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(continued)

Revised (Typed) Technical Specification Pages
Unit 1

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(continued)

Revised (Typed) Technical Specification Pages
Unit 2

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