



Brunswick Nuclear Plant
8470 River Rd SE
Southport, NC 28461

November 5, 2020
Serial: RA-20-0341

10 CFR 50.4(b)(5)(ii)
10 CFR 50.54(q)(5)
10 CFR 72.4

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
Revision to Radiological Emergency Response Plan Implementing Procedure

Ladies and Gentlemen:

In accordance with 10 CFR 50.4(b)(5)(ii), 10 CFR 50.54(q)(5), and 10 CFR 72.4, Duke Energy Progress, LLC (Duke Energy), is submitting an analysis summary for Revision 49 of OPEP-04.2, *Emergency Facilities and Equipment*, a Radiological Emergency Response Plan (ERP) Implementing Procedure.

Duke Energy has evaluated this revision in accordance with 10 CFR 50.54(q) and determined that it does not result in a reduction in the effectiveness of the ERP. The ERP continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Stephen Yodersmith, Brunswick Regulatory Affairs, at (910) 832-2568.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sabrina Salazar', with a long, sweeping horizontal line extending to the right.

Sabrina Salazar
Manager – Nuclear Support Services
Brunswick Steam Electric Plant

Enclosure: 10 CFR 50.54(q)(5) Summary for OPEP-04.2, Revision 49

cc (with Enclosure):

Ms. Laura Dudes, NRC Regional Administrator, Region II

Mr. Andrew Hon, NRC Project Manager

Mr. Gale Smith, NRC Senior Resident Inspector

Mr. John Nguyen, NRC

Director Spent Fuel Management Division, NRC Nuclear Material Safety / Safeguards Office

Chair - North Carolina Utilities Commission

10 CFR 50.54(q)(5) Summary for OPEP-04.2, Revision 49

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of the revision analysis for OPEP-04.2, *Emergency Facilities and Equipment*, Revision 49, which became effective on October 14, 2020.

The changes to OPEP-04.2, *Emergency Facilities and Equipment*, include editorial changes with no change to intent, and changes that are not associated with a planning standard and do not affect the Brunswick Emergency plan functions. In addition to these changes, an unnecessary note was removed regarding silent test frequency. The testing frequency continues to align with FEMA Siren testing in accordance with the FEMA-REP manual as stated by FEMA Region IV in a letter dated April 30, 2020, and approval from Brunswick and New Hanover Counties Emergency Management. Guidance was added for operation of the newly installed Alert and Notification System (ANS), CentrAlert, which will be operating in parallel with the current MOSCAD ANS until final turnover. FEMA Region IV determined that Duke Energy's upgrade to the CentrAlert system will continue to comply with 44 CFR 350.5(5) in a letter dated March 23, 2018. Also, guidance was added to ensure that disposable batteries for equipment are replaced prior to the battery expiration date.

The changes implemented by OPEP-04.2, Revision 49, were evaluated in accordance with 10 CFR 50.54(q). The evaluation concluded that these changes do not result in a reduction in the effectiveness of the ERP; the ERP continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. The design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, are met, or compliance with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter is maintained; and adequate emergency equipment to support emergency response is maintained. As such, there is no impact to compliance, adherence, or effectiveness of the Emergency Plan.

Reference: EREG AR Number 2352199