



John A. Krakuszeski
Vice President
Brunswick Nuclear Plant
8470 River Rd SE
Southport, NC 28461
o: 910.832.3698

October 25, 2021

Serial: RA-21-0275

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 – Exemption Request for Senior
Reactor Operator License Application

- Reference:
1. Letter from John A. Krakuszeski (Duke Energy) to Laura Dudes (U.S. Nuclear Regulatory Commission, Region II), *Application for Senior Reactor Operator License*, Duke Energy Serial Number RA-21-0229, dated July 29, 2021.
 2. Letter from John A. Krakuszeski (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Exemption Request for Senior Reactor Operator License Application*, Duke Energy Serial Number RA-21-0217, dated July 29, 2021.
 3. Letter from John A. Krakuszeski (Duke Energy) to Laura Dudes (U.S. Nuclear Regulatory Commission, Region II), *Application for Senior Reactor Operator License*, Duke Energy Serial Number RA-21-0247, dated August 23, 2021.
 4. Letter from John A. Krakuszeski (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Supplement to Exemption Request for Senior Reactor Operator License Application*, Duke Energy Serial Number RA-21-0235, dated August 26, 2021.
 5. NRR E-mail Capture, *Request for additional information – Brunswick Exemption Request from 10CFR 55.47 License Operator Exam Two-year Waiver Limit (EPID: L-2020-LLE-0035)*, dated October 1, 2021.

Ladies and Gentlemen:

Duke Energy Progress, LLC (Duke Energy), submitted an application, in accordance with 10 CFR 55.31, for an individual to be licensed as a senior reactor operator (SRO) at the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2 (i.e., Reference 1, supplemented by Reference 3). This applicant was previously licensed at BSEP. As a result, in accordance with 10 CFR 55.47, "Waiver of examination and test requirements," Duke Energy requested a waiver of the written examination and operating test requirements. In support of this SRO license application submittal, and in accordance with 10 CFR 55.11, "Specific exemptions," Duke

Energy requested an exemption from the two-year eligibility requirement of 10 CFR 55.47(a)(1) (i.e., Reference 2, supplemented by Reference 4).

On October 1, 2021, by electronic mail (i.e., Reference 5), the Nuclear Regulatory Commission (NRC) provided a request for additional information (RAI) regarding the exemption request. This RAI requested the approximate expected date of projected fatigue rule waivers.

Although the precise time a waiver may be required cannot be predicted, fatigue rule waivers are considered imminent for BSEP from now through February 2023, when new licenses are expected to be activated following completion of the Initial License Training exam in December 2022 and into January 2023. All off-shift licenses, both within Operations staff and licensed individuals in other departments, are now reactivated and supporting shift overtime coverage and, to the full extent possible, staff licenses have been wholly rededicated to shift. Beyond this, shift coverage commitments (minimum staff only) now through December 2021 have already placed the majority of the BSEP licenses at their fatigue rule limits through the end of the year, without all future coverage yet filled. With this, little margin exists for the remaining coverage and for any family/personal illness or emergent plant needs. BSEP has already begun experiencing temporary periods below the requirements of the Brunswick On-Shift Staffing Analysis due to illness with viable candidates available for short notice overtime at their fatigue limits. Re-establishment of the subject SRO license will alleviate over 200 shifts now through February 2023 that would otherwise require overtime from existing licenses and provide increased margin to the need for fatigue rule waivers.

Please refer any questions regarding this submittal to Mr. Mark DeWire, Manager – Nuclear Support Services, at (910) 832-6641.

This document contains no regulatory commitments.

Sincerely,



John A. Krakuszeski

SBY/sby

cc:

Mr. Andrew Hon, NRC Project Manager
Mr. Gale Smith, NRC Senior Resident Inspector
Ms. Laura Dudes, NRC Regional Administrator, Region II
Mr. Gerald J. McCoy, NRC Chief, Operations Branch, Region II
Chair - North Carolina Utilities Commission
