



Brunswick Nuclear Plant
8470 River Rd SE
Southport, NC 28461

November 2, 2021
Serial: RA-21-0291

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 Emergency Plan Implementing Procedures

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 4 of CSD-EP-BNP-0101-01, *EAL Technical Basis Document*, Revision 4 of CSD-EP-BNP-0101-02, *EAL Wallchart (Both Hot And Cold)*, and Revision 2 of AD-EP-BNP-0407, *Emergency Facilities and Equipment*.

Duke Energy has evaluated these Emergency Plan (E-Plan) Implementing Procedure revisions in accordance with 10 CFR 50.54(q) and determined that they do not result in a reduction in the effectiveness of the E-Plan. The E-Plan 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,

Mark R. DeWire
Manager – Nuclear Support Services
Brunswick Steam Electric Plant

Enclosures:

1. 10 CFR 50.54(q)(5) Summary for CSD-EP-BNP-0101-01, Revision 4, and CSD-EP-BNP-0101-02, Revision 4
2. 10 CFR 50.54(q)(5) Summary for AD-EP-BNP-0407, Revision 2

cc (with Enclosures):

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 CSD-EP-BNP-0101-01, Revision 4,
and CSD-EP-BNP-0101-02, Revision 4**

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of the revision analysis for CSD-EP-BNP-0101-01, *EAL Technical Basis Document*, Revision 4, and CSD-EP-BNP-0101-02, *EAL Wallchart (Both Hot And Cold)*, Revision 4, which both became effective on October 28, 2021.

The changes to CSD-EP-BNP-0101-01, *EAL Technical Basis Document*, and CSD-EP-BNP-0101-02, *EAL Wallchart (Both Hot And Cold)*, include editorial changes with no change to intent, and changes that are not associated with a planning standard and do not affect the E-Plan functions. In addition to these changes, the Emergency Action Level (EAL) CU5.1 and SU7.1 Communication Methods tables and associated information were updated to align with the E-Plan. Also, the EAL HU4.4 Bases description was updated to provide additional clarifying information for when an offsite firefighting agency is actively supporting firefighting efforts.

The changes implemented by CSD-EP-BNP-0101-01, Revision 4, and CSD-EP-BNP-0101-02, Revision 4, 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 E-Plan; the E-Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. A standard scheme of emergency classification and action levels remains in use. The meaning or intent of the basis of the approved EAL is unchanged. The classification of the event would NOT be different from that approved by the NRC in the site-specific application. The changes do not reduce the licensee's capability to assess, classify, and declare an emergency condition within 15 minutes of the availability of indications. As such, there is no impact to compliance, adherence, or effectiveness of the E-Plan.

Reference: EREG AR Number 2399933

10 CFR 50.54(q)(5) Summary for AD-EP-BNP-0407, Revision 2

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of the revision analysis for AD-EP-BNP-0407, *Emergency Facilities and Equipment*, Revision 2, which became effective on October 27, 2021.

The changes to AD-EP-BNP-0407, *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 E-Plan functions. Additionally, changes include updates to align aspects of this procedure with E-Plan updates related to the location of the Joint Information Center, Dose Projection responsibility, and phone communications which were updated with NRC approval of Duke Energy Common Emergency Plan and Site Specific Annexes (Reference ML21155A213). In addition, items were removed from inventory that are no longer required due to changes in onsite facility usage, updates to equipment, and duplicate information being available.

The changes implemented by AD-EP-BNP-0407, Revision 2, 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 E-Plan; the E-Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Adequate emergency equipment to support emergency response is maintained. As such, there is no impact to compliance, adherence, or effectiveness of the E-Plan.

Reference: EREG AR Number 2401217