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March 25, 2022

Serial: RA-22-0110 10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Supplement to License Amendment Request to Revise Technical Specifications to Adopt Risk-Informed Completion Times TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b"

Ladies and Gentlemen:

By letter dated April 1, 2021 (ADAMS Accession No. ML21091A053), as supplemented by letters dated April 26,2021 and November 1, 2021 (ADAMS Accession Nos. ML21116A161 and ML21305A891, respectively), Duke Energy Progress, LLC (Duke Energy) requested an amendment to the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2 Technical Specifications (TS). The proposed amendment would modify TS requirements to permit the use of Risk-Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," (ADAMS Accession No. ML18183A493).

In Attachments 1 and 2 of the November 1, 2021, supplement Duke Energy inadvertently omitted a portion of the markup for TS 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)" to align with TSTF-505, Revision 2. Specifically, BSEP TS 3.6.1.3 has the requirement to isolate the affected penetration flow path when one or more penetration flow paths with one PCIV inoperable. This is followed by the requirement to periodically verify the affected penetration flow path is isolated. By adding the flexibility to use a Risk-Informed Completion Time (RICT) to determine the time to isolate the penetration, the periodic verification must then be based on the time "following isolation." Therefore, the enclosure to this letter revises the TS 3.6.1.3 markup to account for the time change caused by RICT implementation. The markup of all other TS provided in the November 1, 2021 supplement remain valid.

Duke Energy has reviewed the information supporting the No Significant Hazards Consideration and the Environmental Consideration that was previously provided to the NRC in the original license amendment request (LAR). The additional information provided in this LAR supplement does not impact the conclusion that the proposed license amendment does not involve a significant hazards consideration. The additional information also does not impact the conclusion that there is no need for an environmental assessment to be prepared in support of the proposed amendment.

There are no regulatory commitments made in this submittal.

In accordance with 10 CFR 50.91, Duke Energy is notifying the State of North Carolina of the supplement to this LAR by transmitting a copy of this letter and enclosure to the designated State Official.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager – Nuclear Fleet Licensing (Acting), at (980) 373-1530.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on March 25, 2022.

Sincerely,

John A. Krakuszeski

JLV/jlv

Enclosure: Markup of Technical Specification 3.6.1.3 for Primary Containment Isolation Valves

cc:

Ms. Laura Dudes, Regional Administrator, Region II
Mr. Luke Haeg, Project Manager
Mr. Gale Smith, NRC Senior Resident Inspector

Chair - North Carolina Utilities Commission
Mr. David Crowley, Radioactive Materials Branch Manager, Radiation Protection Section, NC DHHS

ENCLOSURE

MARKUP OF TECHNICAL SPECIFICATION 3.6.1.3 FOR PRIMARY CONTAINMENT ISOLATION VALVES

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 ----------NOTES---------- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ---------- Verify the affected penetration flow path is isolated.	following isolation Once per 31 days for isolation devices outside primary containment AND Prior to entering MODE 2 or 3 from MODE 4, if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days, for isolation devices inside primary containment

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. ----------NOTE---------- Only applicable to penetration flow paths with two PCIVs. ---------- One or more penetration flow paths with two PCIVs inoperable except for MSIV leakage not within limit.	B.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	2 hours
C. ----------NOTE---------- Only applicable to penetration flow paths with only one PCIV. ---------- One or more penetration flow paths with one PCIV inoperable.	C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange. AND C.2 ----------NOTES---------- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ---------- Verify the affected penetration flow path is isolated.	8 hours except for excess flow check valves (EFCVs) AND 12 hours for EFCVs following isolation Once per 31 days

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
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