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MAY 02 2016

10 CFR 50.73

Serial: BSEP 16-0029

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

Subject: Brunswick Steam Electric Plant, Unit No. 1
Renewed Facility Operating License No. DPR-71
Docket No. 50-325
Licensee Event Report 1-2016-003

In accordance with the Code of Federal Regulations, Title 10, Part 50.73, Duke Energy Progress, Inc., submits the enclosed Licensee Event Report (LER). This report fulfills the requirement for a written report within sixty (60) days of a reportable occurrence.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager – Regulatory Affairs, at (910) 457-2487.

Sincerely,

A handwritten signature in black ink, appearing to read 'WRG', with a small 'for' written below it.

William R. Gideon

WRG/mkb

Enclosure: Licensee Event Report

TE22
NRR

U.S. Nuclear Regulatory Commission

Page 2 of 2

cc (with enclosure):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Ms. Catherine Haney, Regional Administrator
245 Peachtree Center Ave, NE, Suite 1200
Atlanta, GA 30303-1257

U. S. Nuclear Regulatory Commission
ATTN: Ms. Michelle P. Catts, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission
ATTN: Mr. Andrew Hon (Mail Stop OWFN 8G9A) **(Electronic Copy Only)**
11555 Rockville Pike
Rockville, MD 20852-2738

Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

**LICENSEE EVENT REPORT (LER)**(See Page 2 for required number of
digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOF-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME

Brunswick Steam Electric Plant (BSEP), Unit 1

2. DOCKET NUMBER

05000325

3. PAGE

1 OF 3

4. TITLE

Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

5. EVENT DATE

MONTH	DAY	YEAR
03	09	2016

6. LER NUMBER

YEAR	SEQUENTIAL NUMBER	REV NO.
2016	003	00

7. REPORT DATE

MONTH	DAY	YEAR
05	02	2016

8. OTHER FACILITIES INVOLVED

FACILITY NAME	DOCKET NUMBER
	05000
FACILITY NAME	DOCKET NUMBER
	05000

9. OPERATING MODE**11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)**

5

<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A

10. POWER LEVEL

000

12. LICENSEE CONTACT FOR THIS LER**LICENSEE CONTACT**

Lee Grzeck, Manager – Regulatory Affairs

TELEPHONE NUMBER (Include Area Code)

(910) 457-2487

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU- FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU- FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO**15. EXPECTED
SUBMISSION
DATE**

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On March 9, 2016, Unit 1 implemented the guidance of EGM 11-003, Revision 3, "Enforcement Guidance Memorandum 11-003, Revision 3, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel," dated January, 15, 2016. Consistent with EGM 11-003, Revision 3, secondary containment operability was not maintained during Operations with a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Actions C.1 and C.2 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," were not completed. EGM 11-003, Revision 3, was implemented four additional times during the 2016, Unit 1 refueling outage. These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by the plant's TSs.

Implementation of EGM 11-003, Revision 3, during the Unit 1 refueling outage was a planned activity. As such, there was no root cause evaluation of the event. Consistent with the guidance provided in EGM 11-003, Revision 3, BSEP will submit a license amendment request to adopt a Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler.

NRC FORM 366A
(11-2015)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104

EXPIRES: 10/31/2018



LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Brunswick Steam Electric Plant (BSEP) Unit 1	05000-325	2016	- 003	- 000

NARRATIVE

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].

Background

Initial conditions

At the time of the event, Unit 1 was in Mode 5 (i.e., Refuel), at zero percent of rated thermal power (RTP).

Reportability Criteria

On March 9, 2016, Unit 1 implemented the guidance of EGM 11-003, Revision 3, "Enforcement Guidance Memorandum 11-003, Revision 3, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel," dated January 15, 2016. Consistent with EGM 11-003, Revision 3, secondary containment [NG] operability was not maintained during Operations with a Potential for Draining the Reactor Vessel (OPDRV) activities, and Required Actions C.1 and C.2 of Technical Specification (TS) 3.6.4.1, "Secondary Containment," were not completed. EGM 11-003, Revision 3, was implemented four additional times during the 2016, Unit 1 refueling outage. These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by the plant's TSs.

Event Description

On January 15, 2016, the NRC issued EGM 11-003, Revision 3. EGM 11-003, Revision 3, provides generic enforcement discretion to allow implementation of specific interim actions as an alternative to full compliance with plant TSs related to secondary containment operability during Mode 5 OPDRV activities. To ensure compliance with the interim actions specified in the EGM, BSEP developed plant procedure 1SP-16-100, "Unit 1 EGM 11-003 OPDRV Activities." This procedure, which implements compensatory actions that meet or exceed those specified in EGM 11-003, Revision 3, was implemented on five occasions during the 2016, Unit 1 refueling outage. The following list provides the durations of each period during which EGM 11-003, Revision 3, was implemented (i.e., OPDRV activities were in progress with secondary containment inoperable). Unit 1 was in Mode 5 during these periods.

EGM 11-003, Revision 3 Implementation Duration	Start	End
1 hour, 19 minutes	March 9, 2016, at 1257 Eastern Standard Time (EST)	March 9, 2016, at 1416 EST
2 days, 2 hours, 56 minutes	March 9, 2016, at 1419 EST	March 11, 2016, at 1715 EST
2 days, 8 hours, 20 minutes	March 11, 2016, at 1915 EST	March 14, 2016, at 0345 Eastern Daylight Time (EDT)
18 hours, 40 minutes	March 14, 2016, at 2035 EDT	March 15, 2016, at 1515 EDT
3 days, 1 hour, 20 minutes	March 15, 2016, at 2010 EDT	March 18, 2016, at 2130 EDT

NRC FORM 366A
(11-2015)

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1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Brunswick Steam Electric Plant (BSEP) Unit 1	05000-325	YEAR 2016	SEQUENTIAL NUMBER - 003	REV NO. - 000

NARRATIVE

Event Causes

Implementation of EGM 11-003, Revision 3, during the Unit 1 refueling outage was a planned activity. As such, there was no root cause evaluation of the event.

Safety Assessment

The safety significance of this event is minimal. As discussed in EGM 11-003, Revision 3, enforcement discretion related to secondary containment operability during Mode 5 OPDRV activities is appropriate because the associated interim actions necessary to receive the discretion ensure an adequate level of safety. To ensure compliance with the interim actions specified in the EGM, BSEP developed plant procedure 1SP-16-100. This procedure was implemented for the OPDRV activities during which secondary containment was not operable.

Corrective Actions

BSEP will submit a license amendment request to adopt a Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler.

Previous Similar Events

A review of LERs for the past three years identified the following previous similar occurrences.

- LER 2-2015-001, dated April 24, 2015, reported implementation of EGM 11-003 during the 2015 Unit 2 refueling outage. The corrective action for LER 2-2015-001 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler. To date, there is not an approved TSTF traveler. As such, the corrective action from LER 2-2015-001 could not be implemented and could not have prevented the condition reported in LER 1-2016-003.
- LER 1-2014-001, dated May 1, 2014, reported implementation of EGM 11-003 during the 2014 Unit 1 refueling outage. The corrective action for LER 1-2014-001 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler. To date, there is not an approved TSTF traveler. As such, the corrective action from LER 1-2014-001 could not be implemented and could not have prevented the condition reported in LER 1-2016-003.
- LER 2-2013-001, dated May 6, 2013, reported implementation of EGM 11-003 during the 2013 Unit 2 refueling outage. The corrective action for LER 2-2013-001 was to submit a license amendment request to adopt a TSTF traveler associated with generic resolution of this issue within four months after the issuance of the Notice of Availability of the TSTF traveler. To date, there is not an approved TSTF traveler. As such, the corrective action from LER 2-2013-001 could not be implemented and could not have prevented the condition reported in LER 1-2016-003.

Commitments

No regulatory commitments are contained in this report.