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

Serial: BSEP 18-0017

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 and 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 summaries of revisions to the Radiological Emergency Response Plan (ERP) and one Implementing Procedure. Specifically, 0ERP, *Radiological Emergency Response Plan*, Revision 91; and 0PEP-02.6.21, *Control Room Offsite Communicator*, Revision 80, have been revised.

Duke Energy has evaluated these revisions, in accordance with 10 CFR 50.54(q), and determined that the revisions are not a reduction in the effectiveness of the Radiological Emergency Response Plan and that the Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. The enclosure to this letter provides 10 CFR 50.54(q)(5) summaries for the revised Radiological Emergency Response Plan and the implementing procedure.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 832-2487.

Sincerely,

Bryan B. Wooten
Director – Organizational Effectiveness
Brunswick Steam Electric Plant

Enclosure: 10 CFR 50.54(q)(5) Summaries for OERP and OPEP-02.6.21

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10 CFR 50.54(q)(5) Summary for OERP, Revision 91

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of the revision to OERP, *Radiological Emergency Response Plan*, Revision 91, which became effective on January 8, 2018.

The changes to the Radiological Emergency Response Plan include updates to many of the site map figures to show updated buildings and roads, along with the changes to the emergency planning zone (EPZ) designations on maps from letters to numbers per the request of the Offsite Response Organizations. The change to the EPZ designators is being implemented in an integrated manner with changes to the State of North Carolina Radiological Response Plan, which includes distribution of public information. The offsite organization assistance was updated and improved to reflect the Duke Fleet support and current locations of these resources. Section 6.0, "Maintaining Emergency Preparedness," was updated to include "testing" to be a more accurate summary of the content within this section. Generic terminology was updated in various sections to include Duke-specific conventions. Various appendices were updated to reflect Duke Fleet support along with various systems that have been implemented, including EP-Net. Lastly, Attachment 1 was updated to reflect the demarcation of responsibilities for Rescue Operations and First Aid, between the onsite Fire Brigade and Security organizations, respectively.

The changes to OERP, Revision 91, implement the State of North Carolina change to the Brunswick Steam Electric Plant (BSEP) EPZ designators, updates text throughout the document to improve the alignment between Duke Energy sites for emergency preparedness administrative and program maintenance, and address multiple comments or questions identified during reviews of the Emergency Plan. As such, there is no impact to compliance, adherence, or effectiveness of the Emergency Plan as validated through a review of the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Reference: EREG AR Number 2171226

10 CFR 50.54(q)(5) Summary for OPEP-02.6.21, Revision 80

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of the revision to OPEP-02.6.21, *Control Room Offsite Communicator*, Revision 80, which became effective on January 4, 2018.

The changes to the Radiological Emergency Response Plan implementing procedure include updating the reference for the fleet standard Emergency Telephone Directory and clarifying generic definitions of Ground and Elevated to include BSEP specifics. Guidance was provided for "Project Period" and "Estimated Release Duration" instructions to avoid unnecessary manual calculations. Section 4, 5, and Attachment 3 were updated to delete a "Note" related to the acceptability of getting the state and local agencies on the line after an event had been declared, but prior to approval of the event notification form (ENF). Lastly, Attachment 3 was updated to align with the more restrictive 60 minute "Follow-up Message" time requirements.

The changes to OPEP-02.6.21, Revision 80, eliminate conflicts between related procedure steps and improve the human factors within the procedure to better assure the timeliness of the information communicated to offsite agencies and the NRC. Also, the changes provide additional clarification of information provided to the offsite response organizations and the Emergency Response Organization to allow for faster population of the ENF. As such, there is no impact to compliance, adherence, or effectiveness of the Emergency Plan as validated through a review of the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Reference: EREG AR Number 2171148