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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
Withdrawal of Information Relating to the Request for License Amendment
Regarding Core Flow Operating Range Expansion (CAC Nos. MF8864
and MF8865)

- References:
1. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Request for License Amendment Regarding Core Flow Operating Range Expansion*, dated September 6, 2016, ADAMS Accession Number ML16257A410
 2. SECY-11-0014, *Use of Containment Accident Pressure in Analyzing Emergency Core Cooling System and Containment Heat Removal System Pump Performance in Postulated Accidents*, dated January 31, 2011, ADAMS Accession Number ML102780586
 3. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Response to Request for Additional Information Regarding Request for License Amendment Regarding Core Flow Operating Range Expansion (CAC Nos. MF8864 and MF8865)*, dated April 6, 2017, ADAMS Accession Number ML17096A482
 4. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Response to Request for Additional Information Regarding License Amendment Regarding Core Flow Operating Range Expansion (CAC Nos. MF8864 and MF8865)*, dated November 1, 2017, ADAMS Accession Number ML17305A875

Ladies and Gentlemen:

By letter dated September 6, 2016 (i.e., Reference 1), Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment would expand the core power-flow operating range (i.e., Maximum Extended Load Line Limit Analysis Plus (MELLLA+)).

Enclosure 11 of the MELLLA+ license amendment application provided a discussion of issues outlined in SECY-11-0014 (i.e., Reference 2) regarding containment accident pressure (CAP)

and described net positive suction head (NPSH) margin calculations performed by Duke Energy. This information was submitted to be responsive to NRC questions raised during a January 8, 2013, pre-submittal meeting for the BSEP MELLLA+ LAR by addressing considerations of SECY-11-0014. However, SECY-11-0014 is only applicable to extended power uprate applications and to applications for new or increased credit for CAP. SECY-11-0014 is not applicable to the Safety Evaluation for BSEP's MELLLA+ LAR because no additional credit for CAP is needed for the BSEP MELLLA+ application.

The generic disposition of the Emergency Core Cooling System (ECCS) NPSH topic in the MELLLA+ license topical report (LTR) (i.e., NEDC-33006P-A, *General Electric Boiling Water Reactor Maximum Extended Load Line Limit Analysis Plus*) describes that the MELLLA+ operating domain does not result in an increase in heat addition to the suppression pool following a loss-of-coolant accident (LOCA). Based on the generic disposition, BSEP operation in the MELLLA+ domain will not have a negative impact on ECCS NPSH. As such, the existing licensing basis for CAP and the existing methodology for demonstrating adequate ECCS NPSH with CAP is being retained.

During the LAR review process, Duke Energy has provided several follow-up submittals (i.e., References 3 and 4) to address NRC questions related to the Enclosure 11 information. In discussions with the NRC regarding these follow-up responses on the Enclosure 11 information, Duke Energy confirmed that SECY-11-0014 is not applicable to the Safety Evaluation for BSEP's MELLLA+ LAR because MELLLA+ has no adverse impact on ECCS NPSH and that no new or increased reliance on CAP is needed for the BSEP MELLLA+ LAR.

Based on the further discussions, the NRC has agreed with Duke Energy's position that SECY-11-0014 is not applicable for the BSEP MELLLA+ LAR. Therefore, to remove confusion that may result from the presence of Enclosure 11, Duke Energy has agreed to and hereby withdraws the Enclosure 11 information, along with the supplemental responses regarding CAP, from consideration as part of the MELLLA+ license amendment application.

No new regulatory commitments are contained in this letter.

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

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on February 14, 2018.

Sincerely,



William R. Gideon

WRM/wrm

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