

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

Serial: RA-19-0029

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 Implementing Procedure

Ladies and Gentlemen:

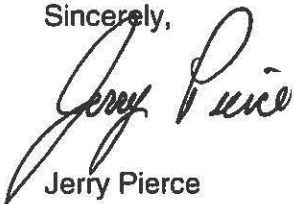
In accordance with 10 CFR 50.4(b)(5)(ii), 10 CFR 50.54(q)(5), and 10 CFR 72.4, Duke Energy Progress, LLC (Duke Energy), is submitting a revision summary for a Radiological Emergency Response Plan Implementing Procedure. Specifically, OPEP-02.6.21, *Control Room Offsite Communicator*, Revision 81, has been revised.

Duke Energy has evaluated this revision in accordance with 10 CFR 50.54(q) and determined that the revision is 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 a 10 CFR 50.54(q)(5) summary for the revised Radiological Emergency Response Plan implementing procedure.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Jerry Pierce, Manager – Nuclear Support Services, at (910) 832-7931.

Sincerely,



Jerry Pierce
Manager – Nuclear Support Services
Brunswick Steam Electric Plant

Enclosure: 10 CFR 50.54(q)(5) Summary for OPEP-02.6.21, Revision 81

cc (with Enclosure):

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10 CFR 50.54(q)(5) Summary for OPEP-02.6.21, Revision 81

In accordance with 10 CFR 50.54(q)(5), Duke Energy Progress, LLC, is providing a summary of changes to OPEP-02.6.21, *Control Room Offsite Communicator*, incorporated in Revision 81, which became effective on December 4, 2018.

The change to the Radiological Emergency Response Plan implementing procedure revised the criteria used to determine whether a Release to the Environment (caused by the emergency) is occurring, which is described in NUREG-0654 as information to be contained in initial and follow-up messages.

The changes to OPEP-02.6.21, Revision 81, added clarification of Attachment 2, Line #5, "Is Occurring" definition. Although parts of the definition matched fleet procedure AD-EP-ALL-0304, OPEP-02.6.21 was missing other attributes of a release in progress that would rely on the performers knowledge. Procedure OPEP-02.6.21, as revised, is capable of alerting off site agencies of the declared emergency and providing follow-up notifications. Thus, the proposed change does not decrease the effectiveness of the Emergency Plan Function of Emergency Notifications. 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 2243838