

November 30, 2022

Serial: RA-22-0344

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

Subject: Brunswick Steam Electric Plant, Unit No. 2
Renewed Facility Operating License No. DPR-62
Docket No. 50-324
Notification of Deviation from BWRVIP Guidelines

Reference:

1. BWRVIP-76, Revision 1-A, *BWR Core Shroud Inspection and Flaw Evaluation Guidelines*, EPRI Report 3002005566, April 2015.
2. BWRVIP-278, Revision 0, *Technical Bases for Revision of the BWRVIP-76 Core Shroud Inspection Program*, EPRI Report 3002000650, December 2013.
3. BWRVIP-94, Revision 4, *Program Implementation Guide*, EPRI Report 3002019689, November 2020.

Ladies and Gentlemen:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of a deviation from the inspection schedule outlined in Boiling Water Reactor Vessel and Internals Project (BWRVIP) guidelines (i.e., Reference 1) for the Duke Energy Progress, LLC (Duke Energy), Brunswick Steam Electric Plant (BSEP), Unit 2. The inspection schedule for BSEP, Unit 2, was modified such that exam of the core shroud horizontal weld 'H1', which was originally planned for the 2023 Refuel Outage (RFO), was deferred to the 2027 RFO. The year 2023 marked the end of a 10-year inspection interval for the 'H1' weld; therefore, inspection deferral to 2027 resulted in a deviation from the inspection schedule guidance contained in Reference 1. In accordance with Reference 3, the acceptability of this exam deferral was documented and approved in a deviation disposition.

The deferral of the 'H1' weld inspection to the 2027 RFO was justified using a plant specific calculation. The methods used in this calculation were consistent with Reference 1 and conservative assumptions were used. The calculational results demonstrate that structural margin is maintained with the deferral of this examination to the 2027 RFO.

The deviation disposition concluded that this inspection deferral will not result in a reduction of nuclear safety for BSEP, Unit 2. In addition to the plant specific calculation which demonstrates structural margin with the deferral, Reference 2 documents the low safety significance of the 'H1' weld. This change in schedule will not create additional risk.

This letter is being submitted for information only (i.e., no action is requested from the NRC staff) in accordance with Reference 3. This letter contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Stephen Yodersmith, Brunswick Regulatory Affairs, at (910) 832-2568.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark R. DeWire', with a long horizontal flourish extending to the right.

Mark R. DeWire
Manager – Nuclear Support Services
Brunswick Steam Electric Plant

cc:

Ms. Laura Dudes, NRC Regional Administrator, Region II
Mr. Luke Haeg, NRC Project Manager
Mr. Gale Smith, NRC Senior Resident Inspector
Ms. Lois James, NRC BWRVIP Project Manager
Chair - North Carolina Utilities Commission