

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Ron Benham  
Manager Nuclear and Regulatory Affairs

December 10, 2019

RA 19-0151

U. S. Nuclear Regulatory Commission  
ATTN: Balwant Singal  
Washington, DC 20555-0001

Reference: Letter dated March 12, 2018, from B. K. Singal, USNRC, to A. C. Heflin, WCNO, "Wolf Creek Generating Station, Unit 1 – Order Approving Indirect Transfer of Control of Renewed Facility Operating License No. NPF-42 (CAC No. MG0235; EPID L-2017-LLM-0005)"

Subject: Docket No. 50-482: Wolf Creek Generating Station, Unit 1 – Entry int. Wolf Creek General Support Services Agreement with Evergy Inc. entities

Dear Mr. Singal:

Thank you very much for taking time to talk with us recently. This correspondence confirms the call between Wolf Creek Generating Station (WCGS) personnel and the U.S. Nuclear Regulatory Commission (NRC) held December 2, 2019, and provides the requested organizational charts discussed on that call (Enclosures I and II). Wolf Creek Nuclear Operating Corporation (WCNO) personnel briefed NRC participants on the call regarding upcoming changes to the various organizations that comprise Evergy Inc. As discussed, WCNO has reviewed the planned personnel reorganization against the criteria described in NRC Regulatory Issue Summary 2001-06 and concludes that this change does not result in either a direct or indirect transfer of control of the NRC license for WCGS for which prior NRC consent is required and is consistent with the prior approval granted in Reference 1 for the reasons generally described below and on the call. We felt it important to communicate this to the NRC in advance of the change, and appreciate the NRC staff's time in discussing it with us.<sup>1</sup>

As background, in the Reference, NRC provided its consent for the indirect transfer of control resulting from the combination of the parent companies of two separate 47% owners of WCGS. Together, the combined parent ("Holdco" in the Reference), presently named Evergy, Inc. holds 94% of the ownership of both WCGS and the voting stock of WCNO, the NRC licensed operator of the facility.<sup>2</sup> As a result of the same transaction, WCNO became part of the larger

<sup>1</sup>In the Reference, by order dated March 12, 2019, the NRC consented to indirect control by Evergy, Inc., the parent of Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.) and its wholly owned subsidiary, Evergy Kansas South, Inc. (f/k/a Kansas Gas & Electric Company), which is a 47% owner of WCGS. Please refer to the attached organizational charts, References 2 and 3.

<sup>2</sup> The remaining 6% ownership of WCGS and stock of WCNO is held by Kansas Electric Power Cooperative.

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Evergy group of companies (i.e., Evergy Metro, Inc., Evergy Kansas Central, Inc., and Evergy Kansas South, Inc.).

Consistent with obtaining the efficiencies of the combined ownership, Evergy now plans to transition WCNOG workers to employees of Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.), which is the 100% owner of Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company), a 47% owner of WCNOG. This planned personnel reorganization allows Evergy to realize the economic advantages of the benefits of its combined size. Evergy Kansas Central, Inc. is an intermediate parent of WCNOG and will continue to provide operating services (specifically, the same WCNOG personnel) to WCNOG under the Wolf Creek General Support Services Agreement. Organization charts, which reflect the relevant corporate relationships pre- and post-merger, are attached.

There will be no change to the Board of Directors or officers or management of WCNOG as a result of this reorganization. Officers and senior managers of WCNOG who currently exercise ultimate decision-making authority over decisions involving nuclear safety or security at WCNOG will retain their positions and authority at WCNOG while also becoming employees of Evergy Kansas Central, Inc. This "dual hatting" of the Chief Nuclear Officer/President and other officers ensures that decisions exercised by those licensee officials may not be modified, overruled, or reversed except by the WCNOG licensee. The makeup of the WCGS site organization will remain unchanged and continue to operate according to the operating licensee's Appendix B programs and procedures. This activity does not result in a functional change to the operating organization, its technical qualifications, the facility, or the plant technical specifications.

The Company plans to implement this change effective January 1, 2020, and accordingly requests that the NRC inform us at the first opportunity of any questions or concerns that might affect that implementation date. Should you have any questions or comments on this letter please contact the undersigned.

Sincerely,



Ron Benham

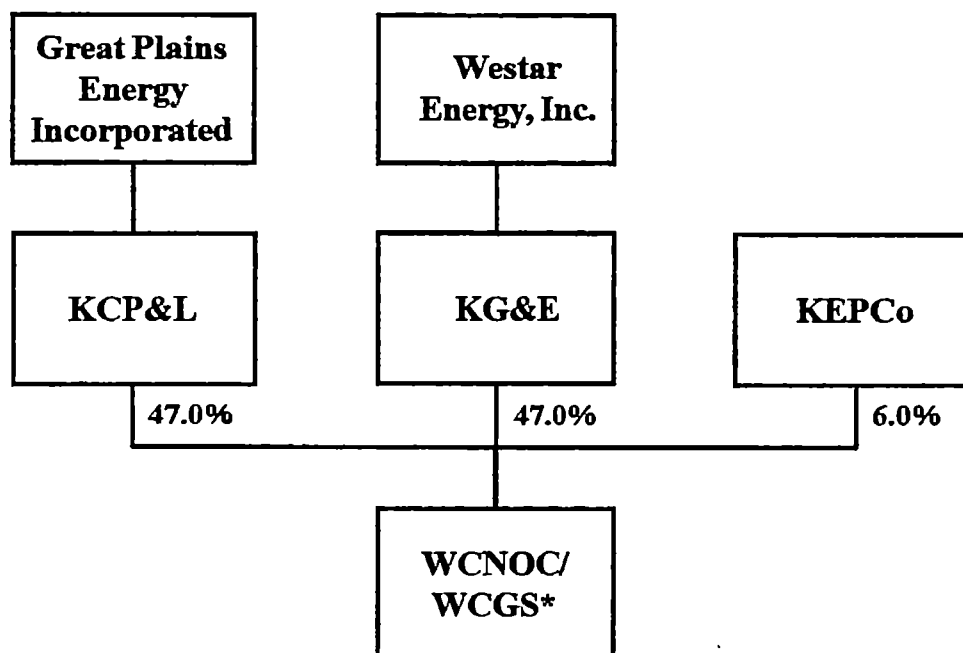
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Enclosures: I Simplified Organization Chart  
II Evergy WCNOG Organization Chart

cc: S. A. Morris (NRC, w/e  
N. O'Keefe (NRC, w/e  
Document Control Desk (NRC), w/e  
Senior Resident Inspector (NRC), w/e

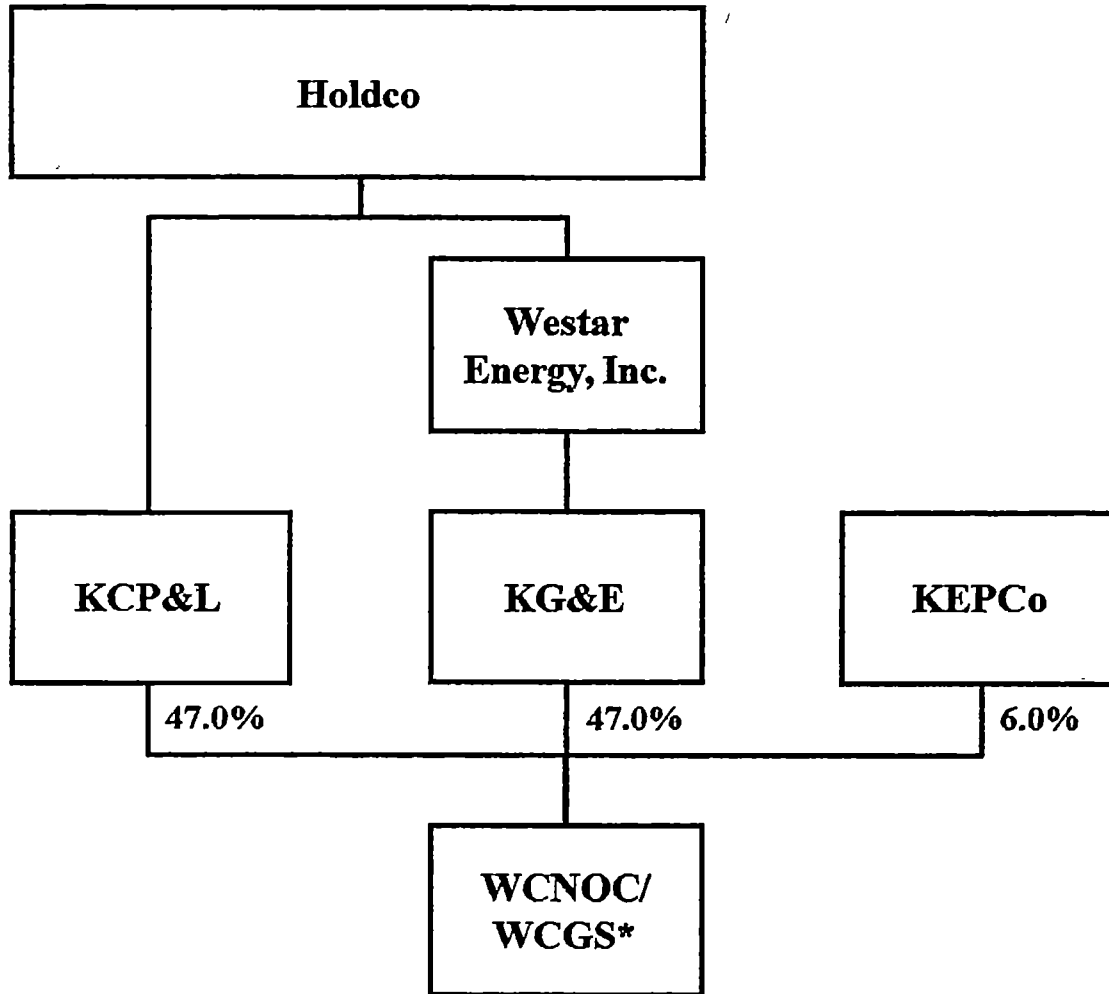
**Enclosure I to RA 19-0151**  
**Simplified Organization Chart (2 pages)**

**Figure 1**  
**Simplified Organizational Chart — Premerger**



\*Note: The owners own undivided interests in WCGS and stock in WCNOC.

**Figure 2**  
**Simplified Organizational Chart — Post-Closing**



**\*Note:** The owners own undivided interests in WCGS and stock in WCNOC.

**Enclosure II to RA 19-0151**  
**Evergy WCNOC Organization Chart (1 page)**

