



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

April 1, 2021

Mr. Cleve Reasoner, Chief Executive Officer  
and Chief Nuclear Officer  
Wolf Creek Nuclear Operating Corp.  
P.O. Box 411  
Burlington, KS 66839

SUBJECT: REVISED - ANNUAL ASSESSMENT LETTER FOR WOLF CREEK  
GENERATING STATION (REPORT 05000482/2020006)

Dear Mr. Reasoner:

The U.S. Nuclear Regulatory Commission (NRC) has completed its end-of-cycle performance assessment of Wolf Creek Generating Station, reviewing performance indicators (PIs), inspection results, and enforcement actions from January 1, 2020 through December 31, 2020. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. The NRC concluded that overall performance at your facility preserved public health and safety. The baseline inspection program was completed at your facility as defined in Inspection Manual Chapter 2515, "Light-Water Reactor Inspection Program - Operations Phase."

This letter is being revised to correct dates in the subject and the first paragraph.

The NRC determined the performance at Wolf Creek Generating Station during the most recent quarter was within the Licensee Response Column, the highest performance category of the NRC's Reactor Oversight Process (ROP) Action Matrix, because all inspection findings had very low safety significance (i.e., Green), and all PIs were within the expected range (i.e., Green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The enclosed inspection plan lists the inspections scheduled through December 31, 2022. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last twelve months of the inspection plan are tentative and may be revised. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In response to the COVID-19 public health emergency (PHE), the NRC is adjusting inspection plans and schedules in order to safeguard the health and safety of both NRC and licensee staff while still effectively implementing the ROP. Each planned inspection is being carefully reviewed in order to determine if any portions of the inspection can be performed remotely, how best to perform on-site portions to minimize personnel health risks, and adjust inspection schedules if needed. This is done in accordance with guidance contained in the February 1, 2021 memo, "Calendar Year 2021 Inspection Guidance During COVID-19 Telework Restrictions" (Agency Documents Access and Management System (ADAMS) Accession

Number ML21027A274). For inspections requiring extensive coordination with offsite organizations, such as evaluated emergency preparedness exercises, NRC guidance and frequently asked questions for security and emergency preparedness can be found here: <https://www.nrc.gov/about-nrc/covid-19/security-ep/>. Similarly, the NRC has developed guidance if force-on-force inspections cannot be completed as scheduled due to an emergency, such as the COVID-19 PHE. These changes help ensure the health and safety of both NRC and licensee staff while maintaining the NRC's important safety and security mission during the COVID-19 PHE. The attached inspection plan is accurate on the date of issuance but remains subject to change based on approval of potential exemption requests or other changes needed due to changing conditions in the COVID-19 PHE. NRC staff will contact your appropriate regulatory affairs staff in order to coordinate inspection planning and scheduling.

On July 18, 2019, the NRC issued a Confirmatory Order (EA-18-165) documenting the commitments made as part of a settlement agreement between Wolf Creek and the NRC. The settlement agreement relates to the apparent violation of NRC requirements as discussed in our letter dated April 2, 2019 (ADAMS Accession Number ML19092A335). That letter provided you with the results of an investigation conducted by the NRC's Office of Investigations at the Wolf Creek Generating Station to determine whether a maintenance worker and a supervisor willfully documented inaccurate information in a required record regarding the cleaning and inspection of control rod drive mechanisms on October 31, 2016. Therefore, the NRC plans to conduct Inspection Procedure 92702, "Follow Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, And Alternative Dispute Resolution Confirmatory Orders" to follow up on your actions to address these commitments. The schedule for this inspection will be decided at a later date since the Confirmatory Order contains actions that are due in 2023.

From August 2018 through August 2019, the NRC issued four Severity Level IV non-cited violations associated with impeding the regulatory process. Therefore, the NRC notified you by letter dated March 3, 2020 (ADAMS Accession Number ML20055E113) that the NRC plans to conduct Inspection Procedure 92723, "Follow Up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period," to follow up on these violations. As part of the 2020 end-of-cycle assessment process, the Regional Administrator, NRC Region IV, authorized the use of this infrequent inspection procedure. You provided written notification to the NRC of your readiness for the inspection in a letter dated January 28, 2021 (ADAMS Accession Number ML21028A661). Therefore, this inspection has been scheduled for the week of March 1, 2021.

Additionally, during this period the NRC will schedule an additional inspection per a revised version of Temporary Instruction (TI) 2515/194, "Inspection of the Licensee's Implementation of Industry Initiative Associated with the Open Phase Condition Design Vulnerability in Electrical Power Systems (NRC Bulletin 2012-01)" for any sites who elect to implement the guidance of the Industry Initiative on Open Phase Condition, Revision 3 (ADAMS Accession Number ML19163A176), which included an option for relying on annunciation and operator manual actions instead of automatic protective features to isolate a power supply affected by an open phase condition. Licensees will be individually notified when the NRC schedules these inspections

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of the "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component

of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Neil O'Keefe at 817-200-1141 with any questions you have regarding this letter.

Sincerely,

Neil F. O'Keefe, Chief  
Reactor Projects Branch B  
Division of Reactor Projects

Docket No. 05000482  
License No. NPF-42

Enclosure:  
Inspection Plan

cc w/ encl: Distribution @ LISTSERV

ANNUAL ASSESSMENT LETTER FOR WOLF CREEK GENERATING STATION  
(REPORT 05000482/2020006) – DATED APRIL 1, 2021

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ADAMS ACCESSION NUMBER: ML21090A330

SUNSI Review      ADAMS:       Non-Publicly Available       Non-Sensitive      Keyword:  
 By: NFO       Yes     No       Publicly Available       Sensitive      NRC-002

OFFICE	SPE:DRP/B	C:DRP/B				
NAME	DProulx	NO'Keefe				
SIGNATURE	<i>DLP</i>	<i>NFO</i>				
DATE	04/01/21	04/01/21				

**OFFICIAL RECORD COPY**

# IP 22 Inspection Activity Plan Report

## 07200079 - Wolf Creek

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>Wolf Creek ISFSI Programs 72.212 Inspection (1 week in June)</b>						4
1	06/01/2021	06/30/2021	IP 60856	001003	Review of 10 CFR 72.212(b) Evaluations	
1	06/01/2021	06/30/2021	IP 60857	001004	Review of 10 CFR 72.48 Evaluations	
<b>Wolf Creek ISFSI Dry Runs and First Loading Inspection (May be 3 trips in July-Sep)</b>						2
1	07/01/2021	09/30/2021	IP 60854	001000	Preoperational Testing Of An ISFSI	
1	07/01/2021	09/30/2021	IP 60855	001001	Operation Of An ISFSI	
1	07/01/2021	09/30/2021	IP 60857	001004	Review of 10 CFR 72.48 Evaluations	

# IP 22 Inspection Activity Plan Report

## Wolf Creek

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>Security FFD .08</b>						
1	02/01/2021	02/05/2021	IP 71130.08	000740	Fitness For Duty Program	1
<b>Wolf Creek Traditional Enforcement Followup</b>						
1	03/01/2021	03/31/2021	IP 92723	000914	Follow Up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the S	2
<b>TI 2515/194 - WC</b>						
1	03/15/2021	03/19/2021	TI 2515/194	000512	Inspection of the Licensee's Implementation of Industry Initiative Associated With the Open Phase Condition Design Vulnerabilities In Electric Power Systems (NRC Bulletin 2012-01)	1
<b>Inservice Inspection RF24 - WC</b>						
1	03/29/2021	04/09/2021	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	1
<b>RP 1,2,PI</b>						
1	04/05/2021	04/09/2021	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	2
1	04/05/2021	04/09/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
<b>Security Access Authorization .01 and Access Control .02 w/PIV</b>						
1	06/14/2021	06/18/2021	IP 71130.01	000733	Access Authorization	2
1	06/14/2021	06/18/2021	IP 71130.02	000734	Access Control	
1	06/14/2021	06/18/2021	IP 71130.09	001656	Security Plan Changes	
1	06/14/2021	06/18/2021	IP 71151	001338	Performance Indicator Verification	
<b>Design Bases Assurance (Team) 21M - Wolf Creek</b>						
1	07/19/2021	08/06/2021	IP 71111.21M	000713	Design Bases Assurance Inspection (Teams)	6

# IP 22 Inspection Activity Plan Report

## Wolf Creek

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>FORCE-ON-FORCE PLANNING AND EXERCISE WEEKS - WC</b>						<b>6</b>
1	08/30/2021	09/03/2021	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
1	09/20/2021	09/24/2021	IP 71130.03	000735	Contingency Response - Force-On-Force Testing	
<b>In-Office EP Exercise Scenario Review - WC</b>						<b>4</b>
1	09/05/2021	10/17/2021	IP 71114.08	000723	Exercise Evaluation □ Scenario Review	
<b>WC 2021 INITIAL EXAM</b>						<b>4</b>
1	09/19/2021	09/25/2021	OV	000956	VALIDATION OF INITIAL LICENSE EXAMINATION (OV)	
1	10/31/2021	11/06/2021	EXAD	000500	LICENSE EXAM ADMINISTRATION (EXAD)	
<b>RP 2,4</b>						<b>2</b>
1	10/04/2021	10/08/2021	IP 71124.02	000726	Occupational ALARA Planning and Controls	
1	10/04/2021	10/08/2021	IP 71124.04	000728	Occupational Dose Assessment	
<b>EP Biennial Exercise and PI Inspection - WC</b>						<b>4</b>
1	11/15/2021	11/19/2021	IP 71114.01	000716	Exercise Evaluation	
1	11/15/2021	11/19/2021	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1	11/15/2021	11/19/2021	IP 71151	001397	Performance Indicator Verification	
<b>Security Access Control .02</b>						<b>1</b>
1	02/28/2022	03/04/2022	IP 71130.02	000734	Access Control	
1	02/28/2022	03/04/2022	IP 71151	001338	Performance Indicator Verification	
<b>RP 5,8</b>						<b>2</b>
1	07/18/2022	07/22/2022	IP 71124.05	000729	Radiation Monitoring Instrumentation	
1	07/18/2022	07/22/2022	IP 71124.08	000732	Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation	

# IP 22 Inspection Activity Plan Report

## Wolf Creek

01/01/2021 - 12/31/2022

Unit	Start	End	Activity	CAC	Title	Staff Count
<b>Security Training/Equip Maint .07 and .04</b>						2
1	07/18/2022	07/22/2022	IP 71130.04	000736	Equipment Performance, Testing, and Maintenance	
1	07/18/2022	07/22/2022	IP 71130.07	000739	Security Training	
<b>MC&amp;A</b>						1
1	07/18/2022	07/22/2022	IP 71130.11	000742	Material Control and Accounting (MC&A)	
<b>WC 2022 BRQ</b>						3
1	07/24/2022	07/30/2022	IP 71111.11B	000704	Licensed Operator Requalification Program and Licensed Operator Performance	
<b>EP Program &amp; PI Inspection - WC</b>						1
1	08/29/2022	09/02/2022	IP 71114.02	000717	Alert and Notification System Testing	
1	08/29/2022	09/02/2022	IP 71114.03	000718	Emergency Response Organization Staffing and Augmentation System	
1	08/29/2022	09/02/2022	IP 71114.04	000719	Emergency Action Level and Emergency Plan Changes	
1	08/29/2022	09/02/2022	IP 71114.05	000720	Maintenance of Emergency Preparedness	
1	08/29/2022	09/02/2022	IP 71151	001397	Performance Indicator Verification	
<b>Inservice Inspection RF25 - WC</b>						1
1	10/03/2022	10/14/2022	IP 71111.08P	000702	Inservice Inspection Activities (PWR)	
<b>RP 1,2,PI</b>						2
1	10/03/2022	10/07/2022	IP 71124.01	000725	Radiological Hazard Assessment and Exposure Controls	
1	10/03/2022	10/07/2022	IP 71124.02	000726	Occupational ALARA Planning and Controls	