

Cleveland Reasoner
Chief Executive Officer and Chief Nuclear Officer

May 24, 2021 WM 21-0005

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

Reference:

- Letter dated March 12, 2018, from B. K. Singal, USNRC, to A. C. Heflin, WCNOC, "Wolf Creek Generating Station, Unit 1 Order Approving Indirect Transfer of Control of Renewed Facility Operating License No. NPF-42 (CAC No. MG0235, EPIC L-2017-LLM-0005)"
- 2) Letter WM 20-0006 dated November 4, 2020, from C. O. Reasoner, WCNOC to USNRC, "License Amendment Request for Change in Owner Licensee Names"

Subject: Docket No. 50-482: Supplement to License Amendment Request for Change to Owner Licensee Names

Commissioners and Staff:

Reference 1 issued an NRC order 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 Reference 1), presently named Evergy, Inc. holds 94% of the ownership of both WCGS and the voting stock of WCNOC, the NRC licensed operator of the generating station. Reference 2 submitted a license amendment request which would modify Renewed License No. NPF-42 to reflect a corporate name change for the owner licensee names for Kansas Gas and Electric Company to Evergy Kansas South, Inc. and Kansas City Power & Light Company to Evergy Metro, Inc.

During discussion between WCNOC personnel and NRC staff, it was identified that there were a number of editorial corrections that needed to be made to the mark-up and revised WCGS operating license pages that were submitted as part of Reference 2. The NRC staff requested WCNOC submit a supplement to the original LAR which contains the corrected pages. Attachment I to this submittal provides corrected markups of the affected pages of the WCGS operating license. Attachment II provides a corrected clean copy of the affected pages of the WCGS operating license, as amended.

The information provided in this submittal does not expand the scope of the application and does not impact the no significant hazards consideration determination presented in Reference 2.

In accordance with 10 CFR 50.91, "Notice for public comment, State consultation," a copy of this submittal is being provided to the designated Kansas State Official.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4000, or Ron Benham at (620) 364-4204.

Sincerely,

Cleveland Reasoner

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COR/rlt

Attachment: I Corrected Proposed Operating License Changes (Mark-up)

II Corrected Revised Operating License Pages

cc: S. S. Lee (NRC), w/a

S. A. Morris (NRC), w/a

N. O'Keefe (NRC), w/a

K. S. Steves (KDHE), w/a

Senior Resident Inspector (NRC), w/a

STATE OF KANSAS **COUNTY OF COFFEY**

Cleveland Reasoner, of lawful age, being first duly sworn upon oath says that he is Chief Executive Officer and Chief Nuclear Officer of Wolf Creek Nuclear Operating Corporation: that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By

Cleveland Reasoner

Chief Executive Officer and Chief Nuclear Officer

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SUBSCRIBED and sworn to before me this 24^{Hy} day of May

RHONDA L. TIEMEYER Notary Public, State of Kansas My Appointment Expires

Expiration Date January 11, 2022

ATTACHMENT I

CORRECTED PROPOSED OPERATING LICENSE CHANGES (MARK-UP)

EVERGY METRO, INC

KANSAS GAS AND ELECTRIC COMPANY

KANSAS CITY POWER & LIGHT COMPANY

KANSAS ELECTRIC POWER COOPERATIVE, INC.

WOLF CREEK NUCLEAR OPERATING CORPORATION

DOCKET NO. 50-482

WOLF CREEK GENERATING STATION, UNIT 1

RENEWED FACILITY OPERATING LICENSE

Renewed License No. NPF-42

- 1. The Nuclear Regulatory Commission (the Commission), having previously made the findings set forth in License No. NPF-42, has now found that:
 - A. The application for a renewed operating License No. NPF-42 filed by Wolf Creek Nuclear Operating Corporation* (WCNOC) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the rules and regulations of the Commission as set forth in Title 10, Chapter I, CFR, and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of the Wolf Creek Generating Station, Unit No. 1 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-147 and the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission, (except as exempted from compliance in Section 2.D below);
 - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I, (except as exempted from compliance in Section 2D below);
 - E. Wolf Creek Nuclear Operating Corporation* is technically qualified to engage in the activities authorized by this license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;

*Wolf Creek Nuclear Operating Corporation is authorized to act as agent for the Kansas Gas and Electric Company, Kansas City Power & Light Company, and Kansas Electric Power Cooperative, Inc., and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company), Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company)

Renewed License No. NPF-42

- A. This renewed operating license applies to the Wolf Creek Generating Station, Unit No. 1, a pressurized water nuclear reactor and associated equipment (the facility), owned by Kansas Gas and Electric Company¹, Kansas City Power & Light Company, and Kansas Electric Power Cooperative, Inc., and operated by the Wolf Creek Nuclear Operating Corporation. The facility is located in Coffey County, Kansas, approximately 28 miles east-southeast of Emporia, Kansas, and is described in the licensees' "Final Safety Analysis Report," as supplemented and amended, and in the licensees' Environmental Report, as supplemented and amended.
- B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Wolf Creek Nuclear Operating Corporation (the Operating Corporation), Kansas Gas and Electric Company (KG&E), Kansas City Power & Light Company (KCPL), and Kansas Electric Power Cooperative, Inc. (KEPCO):
 - (1) Pursuant to Section 103 of the Act and 10 CFR Part 50 "Domestic Licensing of Production and Utilization Facilities," the Operating Corporation, to possess, use and operate the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;

Evergy Kansas South, Inc., Evergy Metro, Inc.

- (2) KG&E, KCPL and KEPCO to possess the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;
- (3) The Operating Corporation, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

^{&#}x27;Kansas Gas and Electric Company, which owns a 47% undivided interest in the Wolf Creek Nuclear Operating Corporation and a 47% undivided interest in a possession-only license for the Wolf Creek Generating Station, has merged with and into a wholly owned subsidiary of The Kansas Power and Light Company. This subsidiary, originally named KCA Corporation, was renamed "Kansas Gas and Electric Company" upon consummation of the merger. Accordingly, the name "Kansas Gas and Electric Company" as it appears in this license refers to the post-merger Kansas Gas and Electric Company and not the former entity of the same name.

- (5) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission, now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100%) power) in accordance with the conditions specified herein.

(2)

Evergy Metro, Inc.

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 227, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3)Antitrust Conditions

Evergy Kansas South, Inc. and Kansas Gas & Electric Company and Kansas City Power & Light

Company shall comply with the antitrust conditions delineated in Appendix C to this license.

(4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)*

Deleted per Amendment No. 141.

^{*}The parenthetical notation following the title of many license conditions denotes the section of the supporting Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-42

EVERGY KANSAS SOUTH, INC.

EVERGY METRO, INC.

KANSAS GAS AND ELECTRIC COMPANY

KANSAS CITY POWER & LIGHT COMPANY

KANSAS ELECTRIC POWER COOPERATIVE, INC.

WOLF CREEK GENERATING STATION UNIT 1

DOCKET NO. 50-482

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)



WOLF CREEK, UNIT 1

EVERGY KANSAS SOUTH, INC.

ANTITRUST CONDITIONS FOR

KANSAS GAS AND ELECTRIC COMPANY

Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company)

1. As used herein:

- (a) "Licensee" means Kansas Gas and Electric Company.
- (b) "Licensee's Service Area" means those counties located in whole or in part within the area certificated to Licensee and Western Resources' KPL division by the appropriate state regulatory commission.

 Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.)
- (c) "Bulk Power" means the electric power, and any attendant energy, supplied or made available at transmission or subtransmission voltage by one entity to another.
- (d) "Emergency support" is capacity and energy as available from one system, and as needed by another system to replace capacity and energy made unavailable due to forced outages of generating equipment or transmission facilities.
- (e) "Maintenance support" is capacity and energy planned by one system to be made available to another system to replace capacity and energy made unavailable due to forced maintenance of generating equipment or transmission facilities.
- (f) "Entity" means a financially responsible private or public corporation, governmental agency or authority, municipality, cooperative, or lawful association of any of the foregoing, owning, contractually controlling, or operating, or in good faith proposing to own, contractually control, or operate, facilities for the generation and transmission of electricity for bulk power supply which meets each of the following criteria: (1) its existing or proposed facilities are technically feasible of interconnection with those of Licensee; (2) with the exception of municipalities, cooperatives, government agencies or authorities it is, or upon commencement of operations will be, a public utility subject to regulation with respect to rates and services under the laws of Kansas.
- (g) "KEC" refers to Kansas Electric Cooperatives, Inc. or Kansas Electric Power Cooperative, Inc. insofar as it shall become a successor in interest.
- (h) "KEPCo" refers to Kansas Electric Power Cooperative, Inc. as the successor in interest to KEC.
- (i) "KEPCo Members in Licensee's Service Area" refers to all KEPCo Member rural electric cooperatives with facilities in the combined service area of Western Resources' KPL division and Kansas Gas and Electric Company.
- (j) "Power Requirements" of the KEPCo Members in Licensee's Service Area refers to the sum for all such KEPCo Members of the delivery point contributions to Western Resources' KPL division's greatest one hour net load for the month.

Evergy Kansas Central, Inc.

Amendment No. 147

WOLF CREEK, UNIT 1

ANTITRUST CONDITIONS FOR

KANSAS CITY POWER & LIGHT COMPANY

Evergy Metro, Inc.

EVERGY METRO, INC

As used herein:

- (a) "Licensee" means Kansas City Power & Light Company.
- (b) "Licensee's Service Area" means those portions of the States of Missouri and Kansas which are certificated to Licensee by the respective state regulatory commissions. An entity shall be deemed to be in the "Licensee's Service Area" if it has electric power generation, transmission or distribution facilities located in whole or in part in or adjacent to the above-described area or in counties served in part at retail by Licensee.
- (c) "Bulk Power" means the electric power, and any attendant energy, supplied or made available at transmission or subtransmission voltage by one entity to another.
- (d) "Entity" means person, a private or public corporation, a municipality, a cooperative, a joint stock association, business trust or a lawful association of any of the foregoing constituting, a separate legal entity owning, operating or proposing to own or operate equipment or facilities for the generation, transmission, or distribution of electricity, provided that, except for municipalities and cooperatives, an "entity" is restricted to those which are or will be a public utility under the laws of the state in which the entity transacts business or under the Federal Power Act and are or will be providing electric service under a contract or rate schedule on file with and subject to the regulation of a state regulatory commission or the Federal Power Commission.
- (e) "Cost" means any and all operating, maintenance, general and administrative expenses, together with any and all ownership costs, which are reasonably allocable to the transaction consistent with industry practices. Cost shall include a reasonable return on Licensee's investment. The

ATTACHMENT II CORRECTED REVISED OPERATING LICENSE PAGES

EVERGY KANSAS SOUTH, INC.

EVERGY METRO, INC.

KANSAS ELECTRIC POWER COOPERATIVE, INC.

WOLF CREEK NUCLEAR OPERATING CORPORATION

DOCKET NO. 50-482

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 - A. The application for a renewed operating License No. NPF-42 filed by Wolf Creek Nuclear Operating Corporation* (WCNOC) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the rules and regulations of the Commission as set forth in Title 10, Chapter I, CFR, and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of the Wolf Creek Generating Station, Unit No. 1 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-147 and the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission, (except as exempted from compliance in Section 2.D below);
 - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I, (except as exempted from compliance in Section 2D below);
 - E. Wolf Creek Nuclear Operating Corporation* is technically qualified to engage in the activities authorized by this license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;

^{*}Wolf Creek Nuclear Operating Corporation is authorized to act as agent for the Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company), Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company), and Kansas Electric Power Cooperative, Inc., and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility. Historic reference to the Kansas Gas and Electric Company and the Kansas City Power & Light Company is not changed.

- A. This renewed operating license applies to the Wolf Creek Generating Station, Unit No. 1, a pressurized water nuclear reactor and associated equipment (the facility), owned by Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company), Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company), and Kansas Electric Power Cooperative, Inc., and operated by the Wolf Creek Nuclear Operating Corporation. The facility is located in Coffey County, Kansas, approximately 28 miles east-southeast of Emporia, Kansas, and is described in the licensees' "Final Safety Analysis Report," as supplemented and amended, and in the licensees' Environmental Report, as supplemented and amended.
- B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Wolf Creek Nuclear Operating Corporation (the Operating Corporation), Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company), Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company), and Kansas Electric Power Cooperative, Inc. (KEPCO):
 - (1) Pursuant to Section 103 of the Act and 10 CFR Part 50 "Domestic Licensing of Production and Utilization Facilities," the Operating Corporation, to possess, use and operate the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;
 - (2) Evergy Kansas South, Inc., Evergy Metro, Inc. and KEPCO to possess the facility at the designated location in Coffey County, Kansas, in accordance with the procedures and limitations set forth in this license;
 - (3) The Operating Corporation, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
 - (4) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

- (5) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) The Operating Corporation, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission, now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) <u>Maximum Power Level</u>

The Operating Corporation is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 227, and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

Evergy Kansas South, Inc. and Evergy Metro, Inc. shall comply with the antitrust conditions delineated in Appendix C to this license.

(4) Environmental Qualification (Section 3.11, SSER #4, Section 3.11, SSER #5)*

Deleted per Amendment No. 141.

^{*}The parenthetical notation following the title of many license conditions denotes the section of the supporting Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

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EVERGY KANSAS SOUTH, INC.

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KANSAS ELECTRIC POWER COOPERATIVE, INC.

WOLF CREEK GENERATING STATION UNIT 1

DOCKET NO. 50-482

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

WOLF CREEK, UNIT 1

ANTITRUST CONDITIONS FOR

EVERGY KANSAS SOUTH, INC.

1. As used herein:

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- (c) "Bulk Power" means the electric power, and any attendant energy, supplied or made available at transmission or subtransmission voltage by one entity to another.
- (d) "Emergency support" is capacity and energy as available from one system, and as needed by another system to replace capacity and energy made unavailable due to forced outages of generating equipment or transmission facilities.
- (e) "Maintenance support" is capacity and energy planned by one system to be made available to another system to replace capacity and energy made unavailable due to forced maintenance of generating equipment or transmission facilities.
- (f) "Entity" means a financially responsible private or public corporation, governmental agency or authority, municipality, cooperative, or lawful association of any of the foregoing, owning, contractually controlling, or operating, or in good faith proposing to own, contractually control, or operate, facilities for the generation and transmission of electricity for bulk power supply which meets each of the following criteria: (1) its existing or proposed facilities are technically feasible of interconnection with those of Licensee; (2) with the exception of municipalities, cooperatives, government agencies or authorities it is, or upon commencement of operations will be, a public utility subject to regulation with respect to rates and services under the laws of Kansas.
- (g) "KEC" refers to Kansas Electric Cooperatives, Inc. or Kansas Electric Power Cooperative, Inc. insofar as it shall become a successor in interest.
- (h) "KEPCo" refers to Kansas Electric Power Cooperative, Inc. as the successor in interest to KEC.
- (i) "KEPCo Members in Licensee's Service Area" refers to all KEPCo Member rural electric cooperatives with facilities in the combined service area of Evergy Kansas Central, Inc. (f/k/a Westar Energy, Inc.) and Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company).
- (j) "Power Requirements" of the KEPCo Members in Licensee's Service Area refers to the sum for all such KEPCo Members of the delivery point contributions to Evergy Kansas Central, Inc. greatest one hour net load for the month.

Amendment No.

WOLF CREEK, UNIT 1

ANTITRUST CONDITIONS FOR

EVERGY METRO, INC.

1. As used herein:

- (a) "Licensee" means Evergy Metro, Inc.
- (b) "Licensee's Service Area" means those portions of the States of Missouri and Kansas, which are certificated to Licensee by the respective state regulatory commissions. An entity shall be deemed to be in the "Licensee's Service Area" if it has electric power generation, transmission or distribution facilities located in whole or in part in or adjacent to the above-described area or in counties served in part at retail by Licensee.
- (c) "Bulk Power" means the electric power, and any attendant energy, supplied or made available at transmission or subtransmission voltage by one entity to another.
- (d) "Entity" means person, a private or public corporation, a municipality, a cooperative, a joint stock association, business trust or a lawful association of any of the foregoing constituting, a separate legal entity owning, operating or proposing to own or operate equipment or facilities for the generation, transmission, or distribution of electricity, provided that, except for municipalities and cooperatives, an "entity" is restricted to those which are or will be a public utility under the laws of the state in which the entity transacts business or under the Federal Power Act and are or will be providing electric service under a contract or rate schedule on file with and subject to the regulation of a state regulatory commission or the Federal Power Commission.
- (e) "Cost" means any and all operating, maintenance, general and administrative expenses, together with any and all ownership costs, which are reasonably allocable to the transaction consistent with industry practices. Cost shall include a reasonable return on Licensee's investment. The