



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 26, 2023

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

SUBJECT: WOLF CREEK GENERATING STATION, UNIT 1 - AUDIT PLAN TO SUPPORT
REVIEW OF REQUEST FOR ALTERNATIVE CONTAINMENT INSERVICE
INSPECTION FREQUENCY (EPID L-2023-LLR-0026)

Dear Mr. Reasoner:

By letter dated May 17, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23137A328), Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) submitted a relief request for the third 10-year interval of the Containment Inservice Inspection Program at Wolf Creek Generating Station, Unit 1. The proposed alternative would change the inspection frequency from 5 to 10 years for the concrete containment unbonded post-tensioning system associated with the containment structure from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," subsection IWL-2420(a).

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the licensee's alternative request and determined that a regulatory audit would assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information.

The audit will be conducted to increase the NRC staff's understanding of the request and identify information that will need to be docketed to support the NRC staff's regulatory findings. The audit will be conducted from June 26 through August 10, 2023, through an online portal (also known as electronic portal, ePortal, or electronic reading room) established by WCNOC. The enclosed audit plan was discussed with your staff on June 20 and 26, 2023.

C. Reasoner

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If you have any questions, please contact me at 301-415-3168 or via email at Samson.Lee@nrc.gov.

Sincerely,

/RA/

Samson S. Lee, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
TO SUPPORT REVIEW OF REQUEST FOR ALTERNATIVE
CONTAINMENT INSERVICE INSPECTION FREQUENCY
WOLF CREEK NUCLEAR OPERATING CORPORATION
WOLF CREEK GENERATING STATION, UNIT 1
DOCKET NO. 50-482

1.0 BACKGROUND

By letter dated May 17, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23137A328), Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) submitted a relief request for the third 10-year interval of the Containment Inservice Inspection Program at Wolf Creek Generating Station, Unit 1 (Wolf Creek). The proposed alternative would change the inspection frequency from 5 to 10 years for the concrete containment unbonded post-tensioning system from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," subsection IWL-2420(a).

The U.S. Nuclear Regulatory Commission (NRC) staff has determined the need for a regulatory audit. The audit will be conducted in accordance with the Office of Nuclear Reactor Regulation Office Instruction LIC-111, Revision 1, "Regulatory Audits" (ML19226A274). The audit will allow NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the alternative request, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

2.0 REGULATORY AUDIT BASIS

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g)(4), "Inservice inspection standards requirement for operating plants," throughout the service life of a nuclear power facility, components that are classified as ASME Class CC pressure retaining components must meet the requirements set forth in ASME Code, subsection IWL, as incorporated by reference in 10 CFR 50.55a(a)(1)(ii), "ASME Boiler and Pressure Vessel Code, Section XI," subject to the conditions listed in 10 CFR 50.55a(b)(2)(ix), "Section XI condition: Metal containment examinations." Section XI, subsection IWL of the ASME Code, provides rules for inservice inspection and repair/replacement activities of the reinforced concrete and post-tensioning system components of class CC containment structures. Alternatives to the requirements of 10 CFR 50.55a(g), "Preservice and inservice inspection requirements," may be authorized by the NRC under 10 CFR 50.55a(z)(1) if the licensee demonstrates that the proposed alternative would provide an acceptable level of quality and safety.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The audit team will review the licensee's tendon past surveillance reports, calculations, and analyses used in the argument supporting the proposed alternative. The audit team will use this

information to determine if the licensee needs to submit any additional information on the docket to support the NRC staff's safety evaluation.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff requests that the licensee have the following information readily available and accessible for the NRC staff's review via an internet-based portal:

- Concrete inspection reports including detailed visual examinations of suspect areas per ASME Code Section XI table IWL-2500-1 (L-A) for years 5, 10, 15, 20, 25, 30, and 35.
- Containment building tendon surveillance and testing reports per ASME Code Section XI table IWL-2500-1 (L-B) for years 5, 10, 15, 20, 25, 30, and 35.
- Containment Inservice Inspection (CISI) Program Plan, Wolf Creek Generating Station, Interval 3, Document #WCRE-36.
- Per Relief Request section 5.2.5, evaluation report(s) to support acceptance of corrosion protection material exceeding 10 percent of the tendon net duct volume.
- Per Relief Request section 5.2.6, examination results from the Wolf Creek condition monitoring program that requires a walkdown of the containment tendon gallery to identify and monitor tendon grease leakage from tendons anchored to the underside of the containment base mat.

Based on the review of these documents, the NRC staff will determine whether it needs to request any additional documents, or whether additional information needs to be submitted on the docket for the staff to complete its safety evaluation.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff:

- George Wang, Structural Engineer
- Shao Lai, Structural Engineer
- Samson Lee, Project Manager

6.0 LOGISTICS

The audit will be conducted from June 26 through August 10, 2023, through an online portal (also known as electronic portal, ePortal, or electronic reading room) established by WCNOG.

The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team expects to request that licensee representatives answer audit team questions during the audit. An exit meeting/call will be held at the conclusion of the audit.

7.0 SPECIAL REQUESTS

The audit team would like access to the documents listed in section 4.0 above through an online portal that allows the audit team to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the audit team has access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

Username and password information should be provided directly to the NRC staff. The NRC project manager will provide to WCNOG the names and contact information of the NRC staff who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

An audit summary will be prepared within 90 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the NRC staff will issue requests for additional information to the licensee after the completion of the audit. Alternatively, the licensee can voluntarily submit a supplement to its licensing request to provide the NRC staff identified information need.

SUBJECT: WOLF CREEK GENERATING STATION, UNIT 1 - AUDIT PLAN TO SUPPORT REVIEW OF REQUEST FOR ALTERNATIVE CONTAINMENT INSERVICE INSPECTION FREQUENCY (EPID L-2023-LLR-0026) DATED JUNE 26, 2023

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ADAMS Accession No.: ML23167A004

***concurrence via email**

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA*	NRR/DEX/ESEB/BC*
NAME	SLee	PBlechman	ITseng
DATE	6/15/2023	6/20/2023	6/15/2023
OFFICE	NRR/DORL/LPL4/BC*	NRR/DORL/LPL4/PM*	
NAME	JDixon-Herrity	SLee	
DATE	6/26/2023	6/26/2023	

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