

From: [Samson Lee](#)
To: [Nathan Lee](#)
Subject: Acceptance Review: Wolf Creek proposed alternative to use ASME Code Case N-752 (EPID: L-2025-LLR-0051)
Date: Friday, June 13, 2025 10:53:00 AM

By letter dated May 8, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25128A304), Wolf Creek Nuclear Operating Corporation (the licensee) submitted a request to use the alternative requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1," for determining the risk-informed categorization and for implementing alternative treatment for repair/replacement activities on moderate and high energy Class 2 and 3 items for the Wolf Creek Generating Station. The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed the licensee's application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed change in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, the licensee will be advised by separate correspondence.

The NRC staff has evaluated precedence related to this request and determined that, on average, the reviews have required 323 hours and 14.2 months. To support a more efficient process, the NRC is setting a goal of 15% improvement. Based on that, our estimate for this review is 275 hours and 12.1 months (estimated completion date in June 2026). But we will strive to meet your need date of April 30, 2026, to allow for planning upcoming refueling outages. These estimates are based on the NRC staff's initial review of the application, and they could change, due to several factors including complexity and uniqueness of the review, requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications. If there are emergent complexities or challenges in the NRC staff's review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

If you have any questions, please contact me.

Samson Lee

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Office of Nuclear Reactor Regulation
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Docket No. 50-482