



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

February 23, 2026

MEMORANDUM TO: Michelle W. Hayes, Chief
Licensing and Regulatory Infrastructure Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

FROM: Emmanuel C. Sayoc, Project Manager
Licensing and Regulatory Infrastructure Branch
Division of New and Renewed Licenses
Office of Nuclear Reactor Regulation

A handwritten signature in blue ink, appearing to read "Emmanuel C. Sayoc".

Signed by Sayoc, Emmanuel
on 02/23/26

SUBJECT: AUDIT PLAN FOR THE STAFF SAFETY REVIEW OF THE DUKE
ENERGY BELEWS CREEK NORTH CAROLINA SITE
EARLY SITE PERMIT APPLICATION

This letter transmits an audit plan for the U.S. Nuclear Regulatory Commission (NRC) staff's safety review of the Duke Energy Carolina's LLC, (Duke), Early Site Permit (ESP) application for the Belew's Creek, North Carolina (NC) site. An environmental audit will be conducted separately.

By letter dated February 8, 2026, the NRC staff accepted the Duke ESP application for the Belews Creek, NC site (Agencywide Documents Access and Management System (ADAMS) Accession No. ML26016A624). The ESP application documents were submitted on December 30, 2025 (ML25364A004). The purpose of this audit is to facilitate NRC staff's safety review of the Duke ESP application in such a manner that identified issues can readily be discussed and resolved, enabling a more effective and efficient review.

The audit will begin on the date of this letter and will tentatively end on October 6, 2026. The audit will be conducted in accordance with the guidance provided in Office Instruction (OI) LIC -111, Revision 2, "Regulatory Audits." (ML24309A281). The audit plan is provided as an enclosure.

Docket No. 05200055

Enclosure:
Audit Plan

cc: GovDelivery

CONTACT: Manny Sayoc, NRR/NLIB
301-415-4080

SUBJECT: AUDIT PLAN FOR THE STAFF SAFETY REVIEW OF THE DUKE ENERGY
 BELEWS CREEK NORTH CAROLINA SITE, EARLY SITE PERMIT
 APPLICATION
 DATED: FEBRUARY 23, 2026

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sherry.andrews@duke-energy.com
arthur.zaremba@duke-energy.com

ADAMS Accession No: ML26042A256		*via econcurrence	NRR-106
OFFICE	NRR/DNRL/NLIB: PM	NRR/DANU/UAL1: LA	NRR/DNRL/NLIB: PM
NAME	IBanks*	DGreene	ESayoc*
DATE	2/11/2026	2/17/2026	2/18/2026
OFFICE	NRR/DNRL/NLIB: BC	NRR/DNRL/NLIB: PM	
NAME	MHayes*	ESayoc*	
DATE	2/20/2026	2/23/26	

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UNITED STATES NUCLEAR REGULATORY COMMISSION
AUDIT PLAN FOR THE STAFF SAFETY REVIEW OF THE DUKE ENERGY BELEWS CREEK
NORTH CAROLINA SITE, EARLY SITE PERMIT APPLICATION DOCKET NO. 05200055

AUDIT PLAN

APPLICANT:

Duke Energy Carolina, LLC (Duke)

CONTACTS:

Lead Regulatory Affairs Specialist: Sherry Andrews,
Senior Licensing Consultant: Arthur Zaremba,

DURATION:

February 24, 2026, through October 6, 2026 (approximately)

LOCATION:

U.S. Nuclear Regulatory Commission (NRC)
Headquarters, via Duke Electronic Reading Room (eRR))

AUDIT TEAM:

Emmanuel Sayoc	Lead Safety Project Manager (PM)
India Banks	Safety PM
George Wang	Civil Engineer
Amitava Ghosh	Physical Scientist
Anthony Torres	Meteorologist
Jenise Thompson	Geologist
Kevin Quinlan	Senior Meteorologist
Sarah Tabatabai	Geophysicist
Nebiyu Tiruneh	Hydrologist
Carol Dye	Geologist
Edward Stutzcage	Reactor Scientist (Radiation)
Jamole Skeeter	Emergency Preparedness Specialist
Edward Robinson	Senior Emergency Preparedness Specialist
Travis Leach	Security Specialist
Tiffany Lee	Reactor Systems Engineer (Quality Assurance Inspection)

I. BACKGROUND AND OBJECTIVES

By letter dated February 8, 2026, the NRC staff accepted Duke's application for an early site permit (ESP) for the Belews Creek North Carolina site (ML26016A624), which Duke submitted on December 30, 2025 (ML25364A004). During this audit, the NRC staff will seek clarification, gain understanding, and verify information related to the safety review of the ESP application. The audit will identify if any information is needed to support a regulatory finding so it can be placed on the docket. Additionally, review and discussion of the audit material will help minimize any subsequent requests for additional information.

II. REGULATORY AUDIT BASIS

The basis for this audit is the regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, Subpart A "Early Site Permits," specific to the requirements of an ESP.

III. REGULATORY AUDIT SCOPE

The audit covers the safety-related portion of Duke's ESP application. A separate audit will be conducted for the environmental aspects.

IV. INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

Duke should be prepared to provide documents, reports, calculations, computer code verification, and other material in response to NRC supplied audit information needs. The NRC staff requests that Duke make these materials available in the eRR.

V. LOGISTICS, SPECIAL REQUESTS, AND DELIVERABLES

Duke and NRC have discussed and agreed upon the following audit logistics:

- Duke will maintain a read-only SharePoint eRR for document viewing.
 - NRC will provide participant names and emails, and Duke will set up read only access for said participants.
- The audit will begin upon receipt of this audit plan and there will be no entrance meeting.
- Weekly schedule for audit activities.
 - Monday – NRC PM uploads to an NRC maintained secure external SharePoint the NRC maintained audit information needs tracker which will identify any new information needs along with the status of current audit information needs.
 - Audit meetings will be scheduled as needed.
 - Throughout the week,
 - As they become available, Duke posts responses to audit information needs in the eRR and notifies NRC PMs via email when responses are available,
 - As they become available, NRC staff review responses to audit

information needs and NRC PMs communicate approval or concerns verbally or via email to the Duke licensing contacts. Once an issue response is approved, the NRC staff will inform Duke if the response needs to be docketed.

- During the audit meetings Duke and NRC staff will:
 - Clarify audit issues,
 - Discuss audit issue resolutions,
 - Discuss additional document needs,
 - Ensure mutual alignment of audit information needs tracker.
- Timeliness of audit issue responses and staff feedback shall be maintained:
 - Duke is expected to respond to audit information needs within 2 weeks,
 - NRC staff is expected to review Duke's response and either approve or identify remaining concerns within 2 weeks,
 - Duke is expected to provide regular docketed responses to batch audit information needs that were requested to be docketed,
 - Duke is expected to maintain and periodically update a red-line strike out version of the ESP application that captures changes resulting from the resolution of audit information needs.
- The final set of audit information needs are expected to be submitted 4 weeks prior to the milestone for the Draft Safety Evaluation Report (August 2026). An audit exit meeting will be conducted in October 2026, but the eRR should remain open until the Final Safety Evaluation Report is completed (March 2027).
- The RAI process will be used when either Duke or the NRC staff determines that it would be more efficient and advantageous to use RAIs to meet the project schedule. The NRC staff acknowledges the proprietary nature of the information requested and will handle it appropriately throughout the audit.
- An audit report will be issued within 90 days following the exit meeting.
- The NRC points of contact for this audit are Emmanuel "Manny" Sayoc at Emmanuel.Sayoc@nrc.gov and India Banks via email at India.Banks@nrc.gov.