From: Samson Lee
To: Nathan Lee
Cc: Qiang Shi
Subject: Wolf Creek 10 CFR 50.69 audit questions (NPHP) dated April 15, 2026
Date: Wednesday, April 15, 2026 9:31:00 AM

By letter dated January 30, 2025, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25030A384), as supplemented by letter dated February 3, 2026 (ML26034C129), Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) submitted a license amendment request (LAR) for the Wolf Creek Generating Station (WCGS, Wolf Creek) to adopt Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors."

The U.S. Nuclear Regulatory Commission (NRC) staff has identified the need for a regulatory audit to examine the licensee's non-docketed information with the intent to gain understanding, to verify information, or to identify information that will require docketing to support the basis of the licensing or regulatory decision. The NRC staff issued an audit plan dated April 2, 2025 (ML25090A217). The NRC staff has formulated initial audit discussion questions below for certain technical areas. If time allows, please prepare responses to these questions in advance. It would facilitate the audit discussions, especially if responses can be posted in the online portal as they become available. The NRC staff plans to issue additional audit discussion questions for other technical areas to support breakout audit meetings for efficiency.

Wolf Creek 50.69 Audit Questions (NPHP, April 15, 2026)

Piping and Head Penetrations Branch (NPHP)

NPHP-01

Prerequisite 2, "Integrity Management," of the Electric Power Research Institute (EPRI) topical report requires that licensees using the EPRI topical report have robust Localized Corrosion, Flow Accelerated Corrosion (FAC), and Erosion programs in place. The licensee's letter dated February 3, 2026, gives a brief overview of the Integrity Management Programs, but not enough detail was provided to allow for a sufficient review. For the audit, a discussion on the Integrity Management Programs is needed.

a. Provide documentation with a high-level description of the Localized Corrosion Program at Wolf Creek.
b. Provide documentation with a high-level description of the FAC Program at Wolf Creek.
c. Provide documentation with a high-level description of the Erosion Program at Wolf Creek.

NPHP-02

Please provide documentation showing which pressure retaining Systems, Structures, and Components (SSCs) will be characterized as high safety significance (HSS) in the Auxiliary Feedwater System and the Service Water System at Wolf Creek. The licensee's letter dated February 3, 2026, indicates that the EPRI topical report uses twelve criteria to categorize passive components and their associated supports. Discuss

which of the twelve criteria would cause the SSCs to be determined to be HSS.

Docket No. 50-482