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10 CFR 50.90

February 27, 2025

US Nuclear Regulatory Commission
ATTN : Document Control Desk
Washington, DC 20555-0001

Hope Creek Generating Station
Renewed Facility Operating License No. NPF-57
NRC Docket No. 50-354

Subject : **Supplement to Emergency License Amendment Request to Extend
Completion Time for Inoperable D Emergency Diesel Generator**

References: 1. PSEG letter to NRC, "Emergency License Amendment Request to Extend
Completion Time for Inoperable D Emergency Diesel Generator," dated
February 27, 2025 (ADAMS Accession No. ML25058A095)

In the Reference 1 letter, PSEG Nuclear LLC (PSEG) requested an amendment to the Technical Specifications (TS) for Hope Creek Generating Station (Hope Creek). The proposed change to TS 3/4.8.1, "A. C. Sources – Operating," was requested under emergency circumstances pursuant to 10 CFR 50.91(a)(5). Specifically, the amendment requested a one-time change to the Allowed Outage Time (AOT) for TS Action 3.8.1.1.b.3 from 14 days to 18 days to allow time to complete repairs on the D Emergency Diesel Generator (EDG) lube oil heat exchanger floating end packing rings.

10 CFR 50.91(a)(5) states, in part, "Whenever an emergency situation exists, a licensee requesting an amendment must explain why this emergency situation occurred and why it could not avoid this situation." In Reference 1, Enclosure 1, Section 1, PSEG stated the need for the situation was unavoidable and described the events leading up to submitting the request. This letter provides supplemental information regarding the unavoidable nature of this situation.

From January 31, 2025, to February 9, 2025, repairs were made to the D EDG lube oil heat exchanger to correct an identified condition of water intrusion into the D EDG lube oil system. Upon completion of those repairs, PSEG identified no further indication of water leakage into the lube oil system and declared the D EDG operable. On February 19 at 0200, the D EDG was removed from service for planned maintenance unrelated to the prior water intrusion issue. TS Action 3.8.1.1.b.3 was entered which requires restoring the D EDG to an operable status in 14 days, or placing the unit in HOT SHUTDOWN in 12 hours and COLD SHUTDOWN in the

following 24 hours. Based on the previous repairs and no indications of water leakage into the D EDG lube oil system during the intervening 10 days, PSEG did not expect to find water leakage during the current maintenance window. On February 20 at 1533, water leakage into the D EDG lube oil system was discovered. PSEG has concluded the source of the water leak is the D EDG lube oil heat exchanger floating end packing rings. Repair to the packing rings requires significant disassembly and reassembly of the D EDG which is expected to challenge the current 14-day AOT for TS Action. 3.8.1.1.b.3. The unexpected identification of water leakage into the D EDG lube oil system during the planned 14-day maintenance window did not provide PSEG enough time to request a license amendment under normal or exigent circumstances. Therefore, the situation resulting in the request for emergency approval pursuant to 10 CFR 50.91(a)(5) was unavoidable.

PSEG has determined that this supplemental information does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards consideration determination provided in Reference 1. Further, this supplemental information does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment need be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this letter.

If there are any questions or if additional information is needed, please contact Mr. Shane Jurek at Shane.Jurek@pseg.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2025.



Eric A. Larson
Site Vice President – Hope Creek Generating Station
PSEG Nuclear

cc: Administrator, Region 1, NRC
NRC Project Manager, Hope Creek
NRC Senior Resident Inspector, Hope Creek
Manager, New Jersey Bureau of Nuclear Engineering
PSEG Commitment Tracking Coordinator