Niagara Mohawk

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January 17, 2000
NMP2L 1925

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: ***Draft Safety Evaluation Regarding Proposed Conversion to Improved Standard Technical Specifications for Nine Mile Point Nuclear Station, Unit No. 2 (TAC No. MA3822)***

Gentlemen:

By letters dated December 13, 1999 and January 4, 2000, the NRC Staff provided its draft Safety Evaluation (SE) and supplement to the draft SE on the proposed conversion of the Nine Mile Point Unit 2 (NMP2) Current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) for comment and verification. Niagara Mohawk Power Corporation (NMPC) has completed its review of the draft SE, including the supplement. Enclosed is a hand marked-up copy of the appropriate pages with our comments.

Per a telephone conversation between NMPC and the Staff, the certified ITS and ITS Bases will not be submitted within 30 days of receipt of your December 13, 1999 letter as requested. Revision D to our original October 16, 1998 submittal was submitted to the Staff on January 6, 2000 (NMP2L 1923), to incorporate a recently issued CTS amendment and additional revisions requested by the Staff in ITS Section 3.3. The certified ITS and ITS Bases will be provided to the Staff at least two weeks prior to issuance of the approved ITS, currently scheduled for February 15, 2000. This should ensure any additional comments or changes are adequately addressed.

The additional information requested by the Staff in brackets in the draft SE has been provided in the enclosed markup (e.g., CTS amendments subsequently approved after the October 16, 1998 ITS submittal).

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As requested by the Staff in its December 13, 1999 letter, Attachment 1 contains proposed license conditions for (1) the relocation of certain TS requirements to licensee-controlled documents, and (2) the schedule for the first performance of new and revised surveillance requirements. The content and format of these license conditions are consistent with those provided in the draft SE or similar license conditions in the NMP2 operating license.

Sincerely,

Richard B. Abbott
Vice President Nuclear Engineering

RBA/TWP/kap

Attachment 1
Enclosure

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Acting Section Chief PD-I, Section 1, NRR
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ATTACHMENT 1

PROPOSED COMMITMENTS FOR USE AS LICENSE CONDITIONS

In addition, the license is amended to add paragraphs 2.C.(10) and 2.C.(11) to Facility Operating License No. NPF-69 as follows:

(10) The licensee is authorized by Amendment No. [ ] to relocate certain Technical Specification requirements included in Appendix A to licensee-controlled documents, as described in Table R, Relocated Specifications and Removal of Details Matrix, attached to the NRC Staff's safety evaluation dated [ ], enclosed with the amendment. Implementation of Amendment No. [ ] shall include the relocation of these requirements to the appropriate documents, which shall be completed no later than August, 2000. The relocations to the Updated Safety Analysis Report shall be completed in accordance with 10 CFR 50.71(e).

(11) The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. [ ] shall be as follows:

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.

- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

ENCLOSURE

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. [ ] TO FACILITY OPERATING LICENSE NPF-69

NINE MILE POINT UNIT 2

NIAGARA MOHAWK POWER CORPORATION

DOCKET NO. 50-410

1.0 INTRODUCTION

Nine Mile Point Unit 2 (NMP2) has been operating with Technical Specifications (TS) issued with the original operating license on July 2, 1987, as amended. By application dated October 16, 1998 (NMP2L 1830), as supplemented by letters dated December 30, 1998 (NMP2L 1844), May 10 (NMP2L 1866), June 15 (NMP2L 1872), July 30 (NMP2L 1881), August 2 (NMP2L 1883), August 11 (NMP2L 1885), August 16 (NMP2L 1886), August 19 (NMP2L 1888), August 27 (NMP2L 1893), September 10 (NMP2L 1896), and September 30, 1999 (NMP2L 1900), Niagara Mohawk Power Corporation (NMPC) the licensee proposed to convert the current Technical Specifications (CTS) to improved Technical Specifications (ITS). The conversion is based upon:

- NUREG-1433, "Standard Technical Specifications for General Electric Plants, BWR/4," Revision 1, dated April 1995,
- NUREG-1434, "Standard Technical Specifications for General Electric Plants, BWR/6," Revision 1, dated April 1995,
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and
- 10 CFR 50.36, "Technical Specifications," as amended July 19, 1995 (60 FR 36953).

Hereafter, the proposed or improved TS for NMP2 are referred to as the ITS, the existing TS are referred to as the CTS, and the improved standard TS, such as in NUREG-1433 or NUREG-1434 are referred to as the STS. The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1.

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of meetings that concluded on December 8, 1999. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as a proposed change to STS through the NRC/Nuclear Energy Institute's

	PLANT SERVICE WATER SYSTEM	
	REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM WITHDRAWAL SCHEDULE	

NRC TO PROVIDE AMENDMENT NO.

NRC TO PROVIDE DATE OF AMENDMENT

Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the NMP2 ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the updated final safety analysis report (USAR) for NMP2, for which changes to the documents by the licensee are controlled by a regulation such as 10 CFR 50.59 and may be changed without prior NRC approval). NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TS for NMP2 to be in accordance with 10 CFR 50.36.

Since the licensee prepared the October 16, 1998, application, a number of amendments to the NMP2 operating license were approved. Table 1 provides the subjects of the amendments and the dates of issuance.

TABLE 1

Amendment No.	Description of Change	Date
84	Update Terminology and References to 50.55a	12/9/98
85	Relocate Monitoring Instruments in TS to USAR	12/22/98
86	Testing of Electrical Protection Assemblies	3/18/99
⊕ 87	ALTERNATE ISOLATION METHOD FOR PRIMARY CONTAINMENT BYPASS LEAKAGE PATHS OR PURGE SYSTEM PIPES	12/16/99
88	NEW RELIEF VALVES FOR DRYWELL EQUIPMENT AND DRYWELL FLOOR DRAIN LINES	12/16/99

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The licensee has incorporated these amendments, as appropriate, into the ITS.

The NRC staff's evaluation of the application dated October 16, 1998 (NMP2L 1830), as supplemented by letters dated December 30, 1998 (NMP2L 1844), May 10 (NMP2L 1866), June 15 (NMP2L 1872), July 30 (NMP2L 1881), August 2 (NMP2L 1883), August 11 (NMP2L 1885), August 16 (NMP2L 1886), August 19 (NMP2L 1888), August 27 (NMP2L 1893), September 10 (NMP2L 1896), and September 30, 1999 (NMP2L 1900), is presented in this SE. The NRC staff issued requests for additional information (RAIs) dated March 26, May 10, May 18, June 16, September 21, October 16, and November 10, 1999. Summaries of an NRC staff meeting with the licensee regarding the conversion was issued on December 8, 1999.

,1999.

The license conditions implementing the conversion will make enforceable the following aspects of the conversion: (1) the relocation of requirements from the CTS and (2) the implementation schedule for new and revised SRs in the ITS.

SEPTEMBER 2, AND DECEMBER 14, 1999 (NMP2L 1917), AND JANUARY 6, 2000 (NMP2L 1923),

The Commission's proposed action on the NMP2 application for an amendment dated October 16, 1998, was published in the *Federal Register* on October 20, 1999 (64 FR 56518) and on December 1, 1999 (64 FR 67336). The *Federal Register* notices also addressed beyond-scope issues identified in the licensee's supplemental submittals.

During its review, the NRC staff relied on the Final Policy Statement and the STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that the licensee can develop ITS based on STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation. The SE also explains the NRC staff's conclusion that the ITS, which are based on the STS as modified by plant-specific changes, are consistent with the NMP2 current licensing basis and the requirements of 10 CFR 50.36.

The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, it is acceptable that the ITS differ from the STS, reflecting the current licensing basis for NMP2. The NRC staff approves the licensee's changes to the CTS with modifications documented in the licensee's supplemental submittals.

For the reasons stated *infra* in this SE, the NRC staff finds that the ITS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences; the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," (33 FR 18610, December 17, 1968). Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility owners groups and the NRC staff developed improved STS, such as NUREG-1433 for GE BWR/4's or NUREG-1434 for GE BWR/6's, that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TS, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1433 and NUREG-1434, which were developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The STS in NUREG-1433 and NUREG-1434 were established as a model for developing the ITS for GE BWR/4 and GE BWR/6 plants in general. The STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the nuclear steam system supplier owners groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1433 and NUREG-1434 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety. The STS in NUREG-1433 or NUREG-1434 apply to NMP2.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the safety benefits of the STS, and encouraged licensees to use the STS as the basis for plant-specific TS amendments, and for complete conversions to ITS based on the STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the

possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TS; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

Criterion 1

Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 3

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4

A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part 3.0 of this SE explains the NRC staff's conclusion that the conversion of the NMP2 CTS to ITS based on STS, as modified by plant-specific changes, is consistent with the NMP2 current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

3.0 EVALUATION

The NRC staff's ITS review evaluates changes to CTS that fall into nine (seven) categories defined by the licensee and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in licensee-controlled documents.

The NRC staff review also identified the need for clarifications and additions to the October 16, 1998, application in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change proposed in the amendment request is identified as either

, DECEMBER 14, 1999 (NMP2L 1917), AND JANUARY 6, 2000 (NMP2L 1923).

a discussion of change (DOC) to the CTS or a justification for difference from the STS. The NRC staff's comments were documented as RAIs and forwarded in letters dated ~~April 9,~~ March 26, May 10, May 18, June 16, ~~September 1,~~ September 2, and September 21, 1999. The licensee provided responses to the RAIs in letters dated December 30, 1998 (NMP2L 1844), May 10 (NMP2L 1866), June 15 (NMP2L 1872), July 30 (NMP2L 1881), August 2 (NMP2L 1883), August 11 (NMP2L 1885), August 16 (NMP2L 1886), August 19 (NMP2L 1888), August 27 (NMP2L 1893), September 10 (NMP2L 1896), ~~and~~ September 30, ~~1999~~ (NMP2L 1900). The letters clarified the licensee's bases for translating the CTS requirements into ITS. The NRC staff finds that the licensee's submittals, including the responses to the RAIs, provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of the licensee's proposed changes to the CTS.

The license amendment application was organized such that changes were included in each of the following CTS change categories, as appropriate:

1. Administrative Changes, (A) (i.e., nontechnical changes in the presentation of CTS requirements);

2. Technical Changes - More Restrictive, (M) (i.e., new or additional TS requirements);

3. Technical Changes - Less Restrictive (specific), (L) (i.e., changes, deletions, and relaxations of CTS requirements);

4. Technical Changes - Less Restrictive (generic), (LA) (i.e., relocation of details out of the CTS and into the Bases, USAR, QA Manual, or other appropriate licensee-controlled document);

5. Technical Changes - Less Restrictive (generic), (LB) (i.e., the extension of an instrument Completion Time or Surveillance Frequency in accordance with NRC approved vendor topical reports);

6. Technical Changes - Less Restrictive (generic), (LC) (i.e., changes related to the elimination of various instrument requirements, where the instrument is an alarm or indication-only instrument function that does not otherwise meet the NRC Technical Specification selection criteria);

7. Technical Changes - Less Restrictive (generic), (LD) (i.e., changes that reflect extension of the refueling outage surveillance interval from 18 months to 24 months for surveillances other than channel calibrations);

8. Technical Changes - Less Restrictive (generic), (LE) (i.e., changes that reflect extension of the refueling outage surveillance interval from 18 months to 24 months for channel calibrations surveillances);

9. Relocated Technical Specifications, (R) (i.e., relaxations in which whole CTS specifications (the LCO, and associated actions and SRs) are removed from the

CTS (an NRC-controlled document) and placed in licensee-controlled documents).

The changes that are in the ITS conversion for NMP2 for each of the above categories are listed in the following four tables attached to this SE:

- Table A of Administrative Changes to Current Technical Specifications
- Table M of More Restrictive Changes to Current Technical Specifications
- Table L of Less Restrictive Changes to Current Technical Specifications
- Table R of Relocated Specifications and Removed Details from CTS

These tables provide a summary description of the proposed changes to the CTS, the specific CTS that are being changed, and the specific ITS that incorporate the changes. If the table only lists a CTS LCO, as for example LCO 3.4.1, then the CTS being changed is the specific LCO 3.4.1 or the entirety of the specification for LCO 3.4.1 (i.e., LCO, actions, and SRs) is being changed. However, if an action or an SR is listed, then only the specific action or SR is being changed (e.g., LCO 3.4.1, Action a or SR 4.4.1.2). The same is true for an ITS LCO, action or SR, except the ITS is incorporating the change. The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are only provided in the licensee's application and supplemental letters.

The general categories of changes to the licensee's CTS requirements and STS differences may be better understood as follows:

A. Administrative Changes

Administrative (nontechnical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used the STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

~~1. Providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant);~~

1. ~~2.~~ Identifying plant-specific wording for system names, etc.;

~~3. Changing the wording of specification titles in STS to conform to existing plant practices;~~

2. ~~4.~~ Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS;

3. ~~5.~~ Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS;

4. ~~6.~~ Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TS) but which do not involve a change in requirements;

5. ~~7.~~ Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements;

6. ~~8.~~ Deletion of TS whose applicability has expired; and

7. ~~9.~~ Deletion of redundant TS requirements that exist elsewhere in the TS.

Table A lists the administrative changes being made in the NMP2 ITS conversion. Table A is organized in ITS order by each A-type DOC to the CTS, and provides a summary description of the administrative change that was made, and CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and STS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. Technical Changes - More Restrictive

The licensee, in electing to implement the specifications of the STS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the NMP2 ITS conversion. Table M is organized in ITS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Technical Changes - Less Restrictive (Specific)

Less restrictive requirements include changes, deletions and relaxations to portions of the CTS requirements that are not being retained in ITS. When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of: (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The NMP2 design was also reviewed to determine if the specific design basis and licensing basis for NMP2 are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

A significant number of less restrictive changes to the CTS involved changes, deletions and relaxations to portions of the CTS requirements evaluated in the following ~~twelve~~ ten categories:

(1) Relaxation of LCOs and Administrative Controls (Category I)

(2) Relaxation of Applicability (Category 2)

(3) Relaxation of Surveillance Requirement (Category 3)

(4) Relaxation of Required Action Detail (Category 4)

(5) Relaxation of Required Actions to exit Applicability (Category 5)

(6) Relaxation of Completion Time (Category 6)

(7) Allow Mode changes when LCO not met (Category 7)

(8) Elimination of the requirement to lock the Reactor Mode switch in Shutdown or Refuel (Category 8)

(9) Elimination of CTS Reporting Requirements (Category 9)

(10) Relaxation of Fuel Cycle from 18 to 24 Months (Category 10)

Changes in these categories are considered specific (as opposed to generic) changes. The following discussions address why portions of various specifications within each of these ~~eight~~ ten categories of information or specific requirements are not required to be included in ITS.

(1) Relaxation of LCOs and Administrative Controls (Category 1)

CTS contain LCOs that are overly restrictive because they specify limits on operational and system parameters and on system Operability beyond those necessary to meet safety analysis assumptions. CTS also contain administrative controls that do not contribute to the safe operation of the plant. The ITS, consistent with the guidance in the STS, omit such operational limits and administrative controls. This category of change includes (1) deletion of equipment or systems addressed by the CTS LCOs which are not required or assumed to function by the applicable safety analyses; (2) addition of explicit exceptions to the CTS LCO requirements, consistent with the guidance of the STS and normal plant operations, to provide necessary operational flexibility but without a significant safety impact; and (3) deletion of miscellaneous administrative controls such as reporting requirements—sometimes contained in action requirements—that have no affect on safety. Deletion of such administrative controls allows operators to more clearly focus on issues important to safety. The ITS LCOs and administrative controls resulting from these changes will continue to maintain an adequate degree of protection consistent with the safety analysis while providing an improved focus on issues important to safety and necessary operational flexibility without adversely affecting the safe

operation of the plant. Therefore, less restrictive changes falling within Category 1 are acceptable.

(2) Relaxation of Applicability (Category 2)

Reactor operating conditions are used in CTS to define when the LCO features are required to be operable. CTS applicabilities can be specific defined terms of reactor conditions: hot shutdown, cold shutdown, reactor critical or power operating condition. Applicabilities can also be more general. Depending on the circumstances, CTS may require that the LCO be maintained within limits in "all modes" or "any operating mode." Generalized applicability conditions are not contained in STS, therefore ITS eliminate CTS requirements such as "all modes" or "any operating mode," replacing them with ITS defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

In another application of this type of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminant or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS are satisfied by exiting the applicability thus taking the plant out of the conditions that require the safety system to be operable. These changes are consistent with STS and changes specified as Category 2 are acceptable.

(3) Relaxation of Surveillance Requirement (Category 3)

Prior to placing the plant in a specified operational mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR Frequency thereafter, the CTS require verifying the Operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the Operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of Operability requires meeting the specified acceptance criteria as well as any specified conditions for the conduct of the test. Relaxations of CTS SRs include relaxing both the acceptance criteria and the conditions of performance. These CTS SR relaxations are consistent with STS.

Relaxations of CTS SR acceptance criteria provide operational flexibility, consistent with the guidance of the STS, but do not reduce the level of assurance of Operability provided by the successful performance of the surveillance. Such revised acceptance criteria are acceptable because they remain consistent with the application of the plant safety analysis assumptions for Operability of the LCO-required features.

Relaxations of CTS SR performance conditions include not requiring testing of deenergized equipment (e.g., instrumentation Channel Checks) and equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). These changes are acceptable because the existing

surveillances are not necessary to ensure the capability of the affected components to perform their intended functions. Another relaxation of SR performance conditions is the allowance to verify the position of valves in high radiation areas by administrative means. This change is acceptable because the TS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning such valves negligible.

Finally, the ITS permits the use of an actual as well as a simulated actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS required features cannot distinguish between an "actual" signal and a "test" signal.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. Therefore, because of the reasons stated, less restrictive changes falling within Category 3 are acceptable.

(4) Relaxation of Required Action Detail (Category 4)

CTS provides lists of acceptable devices that may be used to satisfy LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. These changes are consistent with STS and changes specified as Category 4 are acceptable.

(5) Relaxation of Required Actions to exit Applicability (Category 5)

CTS require that in the event specified LCOs are not met, penalty factors to reactor operation, such as resetting setpoints, and power reductions shall be initiated as the method to reestablish the appropriate limits. The ITS are constructed to specify actions for conditions of required features made inoperable. Adopting ITS action requirements for exiting LCO applicabilities is acceptable because the plant remains within analyzed parameters by performance of required actions, or the actions are constructed to minimize risks associated with continued operation while providing time to repair inoperable features. Such actions add margin to safety or verify equipment status such as interlock status for the mode of operation, thereby providing assurance that the plant is configured appropriately or operations that could result in a challenge to safety systems are exited in a time period that is commensurate with the safety importance of the system. Additionally, other changes to TS actions include placing the reactor in a mode where the specification no longer applies, usually resulting in an extension to the time period for taking the plant into shutdown conditions. These actions are commensurate with industry standards for reductions in thermal power in an orderly fashion without compromising safe operation of the plant. These changes are consistent with STS and changes specified as Category 5 are acceptable.

(6) Relaxation of Completion Time (Category 6)

Upon discovery of a failure to meet an LCO, STS specify times for completing required Actions of the associated TS conditions. Required Actions of the associated conditions are used to establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Adopting completion times from the STS is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Category 6 are acceptable.

(7) Allow Mode changes when LCO not met (Category 7)

Making LCO 3.0.4 not applicable (allowing Mode changes when LCO is not met for specific conditions) is acceptable because the requirements which are not met either perform a function which does not result in the inoperability of any functions which are directly credited in the mitigation of an event or other redundant components are available such that a single failure would not result in a loss of function. Therefore, in these instances it is acceptable to eliminate the requirements of LCO 3.0.4.

(8) Elimination of the requirement to lock the Reactor Mode switch in Shutdown or Refuel (Category 8)

Elimination of the requirement to "lock" the Reactor Mode switch in "Shutdown" or "Refuel" is acceptable because the Required Action still requires that the reactor mode switch be maintained in the shutdown or refuel position when the specified condition is not met and Technical Specification requirements will prevent withdrawal of control rods until the LCO requirements are restored. Therefore, it is acceptable to eliminate the requirement to "lock" the Mode switch in shutdown or Refuel.

(9) Elimination of CTS Reporting Requirements (Category 9)

CTS include requirements to submit Special Reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for Special Reports and instead relies on the reporting requirements of 10 CFR 50.73. ITS changes to reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS required limits. These changes are consistent with STS and changes specified as Category 9 are acceptable.

(10) Relaxation of Fuel Cycle from 18 to 24 Months (Category 10)

The ITS includes changes to the frequency of the current surveillance requirements (SRs) to accommodate the planned change from an 18 to 24-month fuel cycle. In their submittal, the licensee stated that the proposed modifications are based on the guidance provided by the staff in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. In the GL 91-04 letter, it is stated that the NRC staff has reviewed a number of requests to extend 18-month surveillances to the end of a fuel cycle and a few requests for changes in surveillance interval to accommodate a 24-month fuel cycle. The staff has found that the effect on safety is small because safety systems use redundant electrical and mechanical components and because licensees perform other surveillances during plant operation that confirm that these systems and components can perform their safety functions. In applying GL 91-04, the licensee evaluated the effect on safety of an increase in 18-month surveillance intervals to accommodate a 24-month fuel cycle. This evaluation supported a conclusion that the effect on safety is small. The licensee confirmed that historical plant maintenance and surveillance data supports this conclusion. Also, the licensee confirmed that assumptions in the plant licensing basis would not be invalidated on the basis of performing any surveillance at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle. In consideration of these confirmations, the licensee need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

In their submittal, the licensee stated that as-left/as-found data was collected as necessary to perform an analysis using the Microsoft Excel 7.0, SYSAT 7.01 and Instrument History Performance Analysis programs by CRS Engineering, Inc. Tolerance interval factor$_{\Lambda}^{S}$ to calculate confidence level$_{\Lambda}^{S}$ were obtained from EPRI Guidelines for Instrument Calibration Extension/Reduction Programs, TR-103335, Tables 4.1 and 4.2, and the methodology explained in NUREG 1475, Applying Statistics, was used to determine a predicted drift value of 95% probability. The licensee used a computer model using least square regression analysis to statistically determine the projected 30-month drift value ~~and correlation coefficient~~ using as-found and as-left data from instrument calibration surveillance tests ~~and was analyzed~~. Review of past test and surveillance data indicated that the system performance during the surveillance test was found to be within acceptable limits. INSERT (10) ATTACHED X No ~~train~~ system failures were identified ~~by performance of the reference cyclic test~~ during the period reviewed. The licensee further stated that based on the results of their evaluation, system redundancy, detectability of the failures by other mid-cycle testing and equipment performance during these mid-cycle tests, it was concluded that the proposed test interval extensions have an insignificant effect on safety.

Based on the above, the staff concludes that in accordance with GL 91-04, the proposed changes have a negligible effect on safety. Historical data supports this conclusion. The proposed changes follow the guidance of GL 91-04, and there are no plant-specific circumstances that preclude 24-month testing intervals. Therefore, based on the compliance with the GL 91-04 criteria, the proposed changes specified as Category 10 are acceptable.

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The results from the Instrument History Performance Analysis program were compared to the calculated confidence levels, where applicable, and worst case drift values were used.

In the DOCs, the licensee also used the following two subsets for generic less restrictive changes to the CTS:

- LB changes (listed as Category B in the table) are those changes that involve the elimination of a requirement that a SR be completed at an interval shorter than the normal surveillance interval just prior to the start of an activity. For example, CTS 4.9.1.2 requires verifying a set of interlocks every 7 days. But it also requires this verification within 24 hours prior to the start of activities for which the interlock is required. The STS and the ITS delete the latter (24 hour) situational surveillance. The normal (e.g., 7 days) surveillance frequency provides reasonable assurance that the affected equipment is functioning properly. The staff has determined that the removal of the situational surveillance frequencies in these cases will have a negligible impact on safety. Therefore, the changes in Category B (LB) are acceptable.

- LC changes (listed as Category C in the table) are those changes related to the extension of an instrument completion time or surveillance frequency in accordance with NRC-approved vendor topical reports. Implementation of NRC-approved topical reports, along with any conditions listed in the associated NRC safety evaluation, ensures that the affected instrumentation is tested at an appropriate frequency and that allowed outage times are appropriate to the instrument function. Therefore, changes in Category C (LC) are acceptable.

D. Relocated CTS Details (Not Entire Specifications)

When TS requirements provide little or no safety benefit, their removal from the TS may be appropriate. This section discusses the relocation of details within the CTS to licensee-controlled documents (DOC type LA). The relocation of entire specifications from the CTS to licensee-controlled documents is discussed below in Section 3.E. In most cases, relaxations previously granted to licensees on a plant-specific basis were the result of: (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of owners groups' comments on the STS (the TSTF process). The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The NMP2 design was also reviewed to determine if the specific design basis and licensing basis of NMP2 were consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the proposed ITS. A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through 4 that follow:

(1) Details of system design

(2) Details concerning the methodology for meeting requirements

(3) Details regarding testing

(4) Performance requirements for indication

The following discussions address why each of the four types of information or specific requirements are not required to be included in ITS.

- Details of System Design (Type 1)

  The design of the facility is required by 10 CFR 50.34 to be described in the USAR. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that station design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA Plan (referenced in the USAR). In 10 CFR 50.59, controls are specified for changing the facility as described in the USAR, and in 10 CFR 50.54(a) criteria are specified for changing the QA Plan. The ITS Bases also contain descriptions of system design and ITS 5.5.10 specifies 10 CFR 50.59 controls for changing the Bases. Removing descriptive details of system design from the CTS is acceptable because this information will be adequately controlled in the USAR, the TRM, or the TS Bases, as appropriate.

- Details concerning the methodology for meeting requirements (Type 2)

  Details for performing actions to meet TS requirements are more appropriately specified in the USAR, the ITS Bases, the TRM, the core operating limits report, the QA Plan, or programmatic documents, such as the Offsite Dose Calculation Manual, which are required by ITS 5.5. For example, details related to system operation that are not directly related to the safety function that the LCO addresses are provided in licensee-controlled documents, but should not be included in the TS. CTS 3.4.1.1 contains details concerning the operation of the recirculation system in single loop. Some of these details are related to the vibration of reactor vessel internals and not to the assumptions concerning recirculation system flow in the loss-of-coolant accident analyses (the function related to the LCO). Therefore, the details related to the vibration of reactor vessel internals may be relocated from the TS to the TRM.

  Removing procedural details for meeting TS requirements from the TS is acceptable because relocating such details to the USAR, the ITS Bases, the TRM, the core operating limits report, the QA Plan, or programmatic documents required by ITS Section 5.5, as appropriate, will maintain an effective level of regulatory control while providing for a more appropriate change control process, such as 10 CFR 50.59 and ITS 5.5.10, Bases Control Program. Another type of change included in this category is the relocation of CTS reporting requirements. Relocating reporting requirements from the CTS is appropriate because ITS Section 5.6, "Reporting Requirements," 10 CFR 50.36, and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

- Details regarding testing (Type 3)

  Details for performing TS SRs are more appropriately specified in the USAR, the ITS Bases, the TRM, or in programmatic documents, such as the Ventilation Filter Testing Program, which are required by ITS 5.5. For example, CTS 4.4.3.2.1 and the associated footnote "*" detail specific methods for determining reactor coolant system (RCS)

leakage. In the ITS, these details are relocated to the Bases. Removing procedural details for performing TS SRs from the TS is acceptable because locating such details in the USAR, the ITS Bases, the TRM, or in programmatic documents required by ITS Section 5.5, as appropriate, will maintain an effective level of regulatory control while providing for a more appropriate change control process, such as 10 CFR 50.59 and ITS 5.5.10, "Technical Specifications (TS) Bases Control Program."

- Performance Requirements for Indication (Type 4)

Requirements related to indication-only instrumentation do not directly affect the operability of the monitored equipment or related systems. Therefore, the details concerning this type of instrumentation are more appropriately specified in the USAR, the ITS Bases, or the TRM. For example, CTS 3.9.2 requires that the source range monitors have annunciation and continuous visual indication in the control room when the plant is in Mode 5. These details are relocated to the Bases. Removing details concerning this instrumentation from the TS is acceptable because locating such details in the USAR, the ITS Bases, or the TRM, as appropriate, will maintain an effective level of regulatory control while providing for a more appropriate change control process, such as 10 CFR 50.59 and ITS 5.5.10, "Technical Specifications (TS) Bases Control Program." In addition, any modifications to the design of these instruments would be implemented through the licensee's design control program, which includes reviews in accordance with 10 CFR 50.59.

(THE R DOCs ARE DESCRIBED IN SECTION 3.E BELOW)

Table R lists the requirements and detailed information in the CTS that are being moved to licensee-controlled documents and not retained in the ITS. Table R is organized in ITS order by each LA-type DOC to the CTS. It includes the following: (1) the ITS section or specification designation, as appropriate, followed by the DOC identifier (e.g., 3.1.1 followed by LA.1 means ITS Specification 3.1.1, DOC LA.1); (2) CTS reference; (3) a summary description of the relocated details; (4) the name of the document to contain the relocated details or requirements (new location); (5) the regulation (or ITS section) for controlling future changes to relocated requirements (control process); and (6) a characterization of the type of change.

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The NRC staff has concluded that these types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- TS Bases controlled in accordance with ~~10 CFR 50.59, as stated in~~ ITS 5.5.10, "Technical Specifications (TS) Bases Control Program."
- USAR (which includes the TRM) controlled by 10 CFR 50.59.
- ~~Programmatic documents required by ITS Section 5.5~~
- Inservice Inspection (ISI) and Inservice Testing Programs controlled by 10 CFR 50.55a
- Offsite Dose Calculation Manual controlled by ITS 5.5.1.
- Core Operating Limits Report controlled by ITS 5.6.5.
- QA plan, as approved by the NRC and referenced in the USAR, controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- SITE EMERGENCY PLAN CONTROLLED BY 10 CFR 50.54(q).

To the extent that requirements and information have been relocated to licensee-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria contained in 10 CFR 50.36 and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Entire CTS Specifications

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36) may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. This section of the SE discusses the relocation of entire specifications in the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and its supplements, the licensee proposed relocating such specifications from the CTS to the USAR, which includes the TRM, ~~and the ISI Program~~, as appropriate. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the USAR (TRM, ~~and ISI Program~~) is acceptable in that changes to the USAR ~~and~~ TRM will be adequately controlled by 10 CFR 50.59 and changes to the ~~ISI Program~~ will be controlled in accordance with ~~10 CFR 50.55a~~. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R is organized by each R-type DOC to the CTS, in a manner generally consistent with the organization of requirements in the ITS. Table R includes: (1) references to the DOC, (2) references to the relocated CTS requirements, (3) summary descriptions of the relocated CTS requirements, (4) names of the documents that will contain the relocated requirements (i.e., the new location), (5) the methods for controlling future changes to the relocated requirements (i.e., the control process), and (6) a characterization of the type of item relocated.

The NRC staff's evaluation of each relocated specification listed in Table R is provided below, mostly in CTS order with the corresponding DOC identifier given in parenthesis after the title of each relocated specification.

1. 3/4.3.2.2.h RCIC Drywell Pressure - High

The function of the RCIC Drywell Pressure - High Function is to provide an isolation signal to the RCIC turbine exhaust inboard and outboard vacuum breaker isolation valves. A high drywell pressure signal in conjunction with a RCIC low steam line pressure signal will isolate the valves. The isolation of these portions of the RCIC system is not used to mitigate a design basis accident or transient. The isolation is provided for protection of the RCIC turbine exhaust lines against operation at high pressures which might cause damage to the equipment. Credit for this isolation is not assumed in any design basis analyses. None of the 10 CFR 50.36 screening

criteria have been satisfied, and therefore the RCIC Drywell Pressure - High Function LCO and Surveillances may be relocated to the TRM.

2. CTS 3/4.3.3.A.2.f ADS 'A' - Manual Inhibit and CTS 3/4.3.3.B.2.e ADS 'B' - Manual Inhibit.

The ADS Manual Inhibit switch allows the operator to defeat ADS actuation as directed by the emergency operating procedures under conditions for which ADS would not be desirable. For example, during an ATWS event low pressure ECCS system activation would dilute sodium pentaborate injected by the Standby Liquid Control (SLC) System thereby reducing the effectiveness of the SLC System ability to shutdown the reactor. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the portions of the LCO and Surveillances applicable to the ADS Manual Inhibit switch may be relocated to the TRM.

3. CTS 3/4.3.6.2 Source Range Monitor

The Source Range Monitor (SRM) control rod block functions to prevent a control rod withdrawal error during reactor startup utilizing SRM signals to create the rod block signal. SRM signals are used to monitor neutron flux during refueling, shutdown, and startup conditions. No design basis accident (DBA) or transient analysis takes credit for rod block signals initiated by the SRMs. ~~They cannot detect degradation of the reactor coolant boundary and they are not part of a primary success path.~~ The SRM control rod block function does not meet any of the criteria in 10 CFR 50.36 and may be relocated out of the CTS to the TRM.

4. CTS 3/4.3.6.3 Intermediate Range Monitor

The Intermediate Range Monitor (IRM) control rod block functions to prevent a control rod withdrawal error during reactor startup utilizing IRM signals to create the rod block signal. IRMs are provided to monitor the neutron flux levels during refueling, shutdown, and startup conditions. No design basis accident (DBA) or transient analysis takes credit for rod block signals initiated by IRMs. ~~They cannot detect degradation of the reactor coolant boundary and they are not part of a primary success path.~~ The ~~SRM~~ IRM control rod block function does not meet any of the criteria in 10 CFR 50.36 and may be relocated out of the CTS to the TRM.

5. CTS 3/4.3.6.4 Scram Discharge Volume

The Scram Discharge Volume (SDV) control rod block functions to prevent control rod withdrawals, utilizing SDV signals to create the rod block signal if water is accumulating in the SDV. The purpose of measuring the SDV water level is to ensure that there is sufficient volume remaining to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal provides an indication to the operator that water is accumulating in the SDV and prevents further rod withdrawals. With continued water accumulation, a reactor protection system initiated scram signal will occur. Thus, the SDV water level rod block signal provides an opportunity for the operator to take action to avoid a subsequent scram. No design basis accident (DBA) or transient takes credit for rod block signals initiated by the SDV instrumentation. ~~It cannot detect degradation of the reactor coolant boundary and it is not part of a primary success path.~~ The SDV rod block signals do not meet any of the criteria in 10 CFR 50.36 and may be relocated out of the CTS to the TRM.

6. CTS 3/4.3.6.5 Reactor Coolant System Recirculation Flow

An increase in reactor recirculation flow causes an increase in neutron flux which results in an increase in reactor power. However, this increase in neutron flux is monitored by the neutron monitoring system which has the capability of providing a reactor scram, when required. No design basis accident (DBA) or transient analysis takes credit for rod block signals initiated by the reactor coolant recirculation system. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Control Rod Block LCO and Surveillances applicable to RCS recirculation flow instrumentation may be relocated to the TRM.

7. CTS 3/4.3.7.1.2 Area Monitors – CRITICALITY MONITOR (NEW FUEL STORAGE VAULT) AND CONTROL ROOM DIRECT RADIATION MONITOR

The area radiation monitors are used to indicate when the radiation in the area has exceeded its allowable setpoint. There are no automatic functions that are performed by these instruments. The instruments are not used to mitigate a design basis accident (DBA) or transient. Information provided by these instruments on the radiation levels would have limited or no use in identifying/assessing core damage. The area radiation monitors do not meet any of the criteria in 10 CFR 50.36 and may be relocated out of the CTS to the TRM.

8. CTS 3/4.3.7.2 Seismic Monitoring Instrumentation

In the event of an earthquake, seismic monitoring instrumentation is required to determine the magnitude of the seismic event. These instruments do not perform any automatic action. They are used to measure the magnitude of the seismic event for comparison to the design basis of the plant to ensure the design margins for plant equipment and structures have not been violated. Since the determination of the magnitude of the seismic event is performed after the event has occurred, this instrumentation has no bearing on the mitigation of any design basis accident (DBA) or transient. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Seismic Monitoring Instrumentation LCO and Surveillances may be relocated to the TRM.

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~~9.~~ CTS 3/4.3.7.3 Meteorological Monitoring Instrumentation

~~Meteorological instrumentation is used to measure environmental parameters that may affect distribution of fission products and gases following a design basis accident (DBA), but it is not an input assumption for any DBA analysis and does not mitigate the accident. Meteorological information is required to evaluate the need for initiating protective measures to protect the health and safety of the public. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Meteorological Monitoring Instrumentation LCO and Surveillances may be relocated to the TRM.~~

10. CTS 3/4.3.7.7 Traversing In-core Probe System

The traversing in-core probe (TIP) system is used for calibration of the LPRM detectors. The TIP system is positioned axially and radially throughout the core to calibrate the local power range monitors (LPRMs). When not in use the TIP instruments are retracted into a storage position outside the drywell. The TIP system supports the operability of the LPRMs. With LPRM

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9. 3/4.3.7.5 Accident Monitoring Instrumentation

Each individual accident monitoring parameter has a specific purpose, however, the general purpose for all accident monitoring instrumentation is to provide sufficient information to confirm an accident is proceeding per prediction, i.e., automatic safety systems are performing properly, and deviations from expected accident course are minimal.

The NRC position on application of the deterministic screening criteria to post-accident monitoring instrumentation is documented in letter dated May 7, 1988 from T.E. Murley (NRC) to R. F. Janecek (BWROG). The position was that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments. Accordingly, this position has been applied to the NMP2 Regulatory Guide 1.97 instruments. Those instruments meeting these criteria have remained in Technical Specifications. The instruments not meeting these criteria have been relocated from the Technical Specifications to plant controlled documents. Therefore, the suppression chamber air temperature instruments, which are neither a Type A nor a Category 1 instrument have been relocated to the TRM.

operability addressed there is no need to address the TIP system in the Technical Specifications. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the TIP System LCO and Surveillances may be relocated to the TRM.

11. CTS 3/4.3.7.8 Loose-part Detection System

The loose-part detection system is used to detect loose parts in the reactor vessel. The instrumentation does not indicate that there is a degradation in the primary pressure boundary but indicates that there might be a remote chance of damage to a component due to a loose part. Fuel failure due to fuel bundle flow blockage from a lost part will be detected by the radiation monitors in the offgas stream. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Loose-Part Detection System LCO and Surveillances may be relocated to the TRM.

12. CTS 3/4.3.7.9 Radioactive Liquid Effluent Monitoring Instrumentation

The radioactive liquid effluent monitoring instrumentation is neither a safety system nor is connected to the reactor coolant system. This instrumentation is used for the purpose of showing conformance to the discharge limits of 10 CFR part 20. It is not installed to detect excessive reactor coolant leakage. The radioactive liquid effluent monitors are used routinely to provide continuous check on the release of radioactive liquid effluent from the normal plant liquid effluent flowpaths. These Technical Specifications require the Licensee to maintain operability of various liquid effluent monitors and establish setpoints in accordance with the Offsite dose Calculation Manual (ODCM). The Alarm/Trip setpoints are established to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. Plant DBA analyses do not assume any action, either automatic or manual, resulting from radioactive effluent monitors. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Radioactive Liquid Effluent Monitoring Instrumentation LCO and Surveillances may be relocated to the ~~TRM.~~ ODCM.

13. CTS 3/4.3.7.10 Radioactive Gaseous Effluent Monitoring Instrumentation

The radioactive gaseous effluent monitoring instrumentation is neither a safety system nor is it connected to the reactor coolant system. The primary function of this instrumentation is to show conformance to the discharge limits of 10 CFR Part 20. This instrumentation is not installed to detect excessive reactor coolant leakage. The radioactive gaseous effluent monitors are used routinely to provide continuous check on the releases of radioactive gaseous effluents from the normal plant gaseous effluent flowpaths. These Technical Specifications require the Licensee to maintain operability of various effluent monitors and establish setpoints in accordance with the ODCM. The alarm/trip setpoint are established to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. Plant DBA analyses do not assume any action, either automatic or manual, resulting from radioactive effluent monitors. In addition, the explosive gas monitor instrumentation is provided to ensure that the concentration of potentially explosive gas mixtures contained in the gaseous radwaste treatment system is adequately monitored, which will help ensure that the concentration is maintained below the flammability limit of hydrogen. However, the offgas system is designed to contain detonations and will not affect the function of any safety related equipment. The concentration of hydrogen in the offgas stream is not an initial assumption of any design basis accident (DBA) or transient analysis. None of the 10 CFR

50.36 screening criteria have been satisfied, and therefore the Radioactive Gaseous Effluent Monitoring Instrumentation LCO and Surveillances may be relocated to the ~~TRM.~~ ODCM.

14. CTS 3/4.3.9.2 Service Water System

The function of the Service Water System instrumentation channels is to either ensure the Ultimate Heat Sink is functioning following an earthquake or other non-design basis event, to ensure that indication is available to perform surveillances, or to ensure the intake structure deicer heater system operates automatically. No design basis analysis takes credit for any of these instruments. In addition, other Technical Specifications continue to ensure that the intake deicer heaters are Operable when required, and an SR will continue to ensure that the service water supply header discharge temperature is within limits (thus an indicator must be Operable to measure the temperature). None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Service Water System instrumentation LCO and Surveillances may be relocated to the TRM.

15. CTS 3/4.4.4 Chemistry

Poor reactor coolant water chemistry may contribute to the long term degradation of system materials and thus is not of immediate importance to the plant operator. Reactor coolant water chemistry is monitored for a variety of reasons. One reason is to reduce the possibility of failures in the reactor coolant system pressure boundary caused by corrosion. Severe chemistry transients have resulted in failure of thin walled LPRM instrument dry tubes in a relatively short period of time. However, these LPRM dry tube failures result in loss of the LPRM function and are readily detectable. In summary, the chemistry monitoring activity serves a long term preventative rather than mitigative purpose. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Reactor Coolant System Chemistry LCO and Surveillances may be relocated to the TRM.

16. CTS 3/4.4.8 Structural Integrity

The inspection programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity of these components will be maintained throughout the components life. Other Technical Specifications require important systems to be operable (for example, ECCS 3/4.5.1) and in a ready state for mitigative action. This Technical Specification is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. Hence it is not necessary to retain this specification to ensure immediate operability of safety systems. Further, this Technical Specification prescribes inspection requirements which are performed during plant shutdown. It therefore does not directly address the response to design basis accidents (DBA). None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Structural Integrity LCO and Surveillances may be relocated to the TRM.

17. CTS 3/4.7.2 Revetment-Ditch Structure

The purpose of the Revetment-Ditch Structure is to protect the plant fill and foundation from wave erosion, expected during the probable maximum windstorm for a maximum still water elevation of 254 feet. A windstorm is not a design basis accident or transient, thus the

Revetment-Ditch Structure is not credited in any safety analysis. In addition, the Revetment-Ditch Structure can sustain a high degree of damage and still perform its function. The Revetment-Ditch Structure Technical Specification requirements were put in place to ensure that severe damage will not go undetected for a substantial period of time and if severe damage occurs, facility actions will be taken to repair the Revetment-Ditch Structure. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Revetment-Ditch Structure LCO and Surveillances may be relocated to the TRM.

18. CTS 3/4.7.6 Sealed Source Contamination

The limitations on sealed source contamination are intended to ensure that the total body or individual organ irradiation doses does not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limitation of ≤ 0.005 microcuries of removable contamination on each sealed source. This requirement and the associated Surveillance Requirements bear no relation to the conditions or limitations which are necessary to ensure safe reactor operation. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Sealed Source Contamination LCO and Surveillances may be relocated to the TRM.

19. CTS 3/4.8.4.1 AC Circuits Inside Primary Containment

The circuits involved in this LCO are kept normally de-energized and do not participate in plant safety actions. These circuits are primarily for lighting, utility outlets and convenient power plugs, to be used in the event of plant walkdowns, maintenance and in-situ test and/or observations. They are properly separated from all other Class 1E circuits and operation or failure of these non-Class 1E circuits do not impose any degradation on Class 1E circuits. Thus, in any event, these circuits have no impact on plant safety systems. ~~Therefore,~~ they are of a non-Class 1E nature. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the AC Circuits Inside Primary Containment LCO and Surveillances may be relocated to the TRM.

20. CTS 3/4.8.4.2 Primary Containment Penetration Conductor Overcurrent Protective Devices and CTS 3/4.8.4.3 Emergency Lighting System - Overcurrent Protective Devices

The primary feature of these protective devices is to open the control and/or power circuit whenever the load conditions exceed the present current demands. This is to protect the circuit conductors against damage or failure due to overcurrent heating effects. The continuous monitoring of the operating status of the overcurrent protection devices is impracticable and not covered as part of the control room monitoring, except after trip condition indication. In the event of failure of this protective device to trip the circuit, the upstream protective device is expected to operate and isolate the faulty circuit. Thus, the upper level (back-up) protection will prevent loss of redundant power source. In the worst case fault condition, a single division of protective functions can be lost. However, this scenario is covered under a single failure criterion. The overcurrent protection devices ensure the pressure integrity of the containment penetration. With failure of the device it is postulated that the wire insulation will degrade resulting in a containment leak path during a LOCA. However, containment leakage is not a process variable and is not considered as part of the primary success path. Containment

penetration degradation will be identified during the normal containment leak rate tests required by 10 CFR Part 50, Appendix J. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Primary Containment Penetration Conductor and Emergency Lighting System Overcurrent Protective Devices LCOs and Surveillances may be relocated to the TRM.

21. CTS 3/4.9.1.b.4 Reactor Mode Switch — Fuel Grapple Position and CTS 3/4.9.6 Refueling Platform

Operability of the refueling platform equipment (crane, main hoist including fuel grapple position, and auxiliary hoist) ensures that only the hoists of the refueling platform will be used to handle fuel within the reactor pressure vessel, hoists have sufficient load capacity for handling fuel assemblies and/or control rods and the core internals and pressure vessel are protected from excessive lifting force if they are inadvertently engaged during lifting operations. Although the interlocks designed to provide the above capabilities can prevent damage to the refueling platform equipment and core internals, they are not assumed to function to mitigate the consequences of a design basis accident. Further, in analyzing the control rod withdrawal error during refueling, if any one of the operations involved in initial failure or error is followed by any other single equipment failure or single operator error, the necessary safety actions are taken (e.g., rod block or scram) automatically prior to violation of any limits. Hence the refueling platform interlocks are not part of the primary success path in mitigating the control rod withdrawal error during refueling. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Reactor Mode Switch— Fuel Grapple Position and Refueling Platform LCOs and Surveillances may be relocated to the TRM.

22. CTS 3/4.9.5 COMMUNICATIONS

Communication between the control room and refueling floor personnel is maintained to ensure that refueling personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling. The communications allow for coordination of activities that require interaction between the control room and refueling floor personnel (such as the insertion of a control rod prior to loading fuel). However, the refueling system design accident or transient response does not take credit for communications. None of the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Communications LCOs and Surveillances may be relocated to the TRM.

23. CTS 3/4.9.7 Crane Travel - Spent Fuel Storage Pool

The restriction on movement of loads in excess of the nominal weight of a fuel assembly over other fuel assemblies in the storage pool ensures that in the event the load is dropped, the activity release will be limited to that contained in a single fuel assembly and any possible distortion of the fuel in the storage racks will not result in a critical array. Administrative monitoring of loads moving over the fuel storage racks serves as a backup to the crane interlocks. Although this Technical Specification supports the maximum refueling accident assumption in the design basis accident (DBA), the crane travel limits are not monitored and controlled during operation; they are checked on a periodic basis to ensure operability. The deterministic criteria for Technical Specification retention are, therefore, not satisfied. None of

; and 3/4.12 Radiological Environmental Monitoring including:

the 10 CFR 50.36 screening criteria have been satisfied, and therefore the Crane Travel - Spent Fuel Storage Pool LCOs and Surveillances may be relocated to the TRM.

24. CTS 3/4.11 Radioactive Effluents, including: CTS 3/4.11.1.1 Concentration, CTS 3/4.11.1.2 Dose, CTS 3/4.11.1.3 Liquid Radwaste Treatment System, CTS 3/4.11.2.1 Dose Rate, CTS 3/4.11.2.2 Dose - Noble Gases, CTS 3/4.11.2.3 Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form, CTS 3/4.11.2.4 Gaseous Radwaste Treatment System, CTS 3/4.11.2.5 Ventilation Exhaust Treatment System, CTS 3/4.11.2.8 Venting or Purging, CTS 3/4.11.3 Solid Radioactive Wastes, CTS 3/4.11.4 Total Dose, CTS 3/4.12.1 Monitoring Program, CTS 3/4.12.2 Land Use Census, and CTS 3/4.12.3 Interlaboratory Comparison Program.

The requirements contained within these TS are not related to any design basis accident or transient. These requirements thus do not fall within the 10 CFR 50.36 screening criteria, and accordingly can be relocated to the ~~TRM~~/PCP/ODCM. The relocation of these requirements is in conformance with the guidance provided licensees in Generic Letter 89-01 (Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program).

The relocated specifications from the CTS discussed above are not required to be in the TS because they do not fall within the criteria for mandatory inclusion in the TS as stated in 10 CFR 50.36(c)(2)(ii). The requirements in these specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to the ~~USAR,~~ TRM, ODCM, or ~~ISI Program.~~ PCP. These relocations are the subject of a license condition discussed in Section 5.0 of this SE. Until incorporated in these licensee-controlled documents, changes to these specifications, information, and requirements will be controlled in accordance with the current applicable procedures that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this SE, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's application dated October 16, 1998, as supplemented by letters dated May 10 (NMP2L 1866), June 15 (NMP2L 1872), July 30 (NMP2L 1881), August 2 (NMP2L 1883), August 11 (NMP2L 1885), August 16 (NMP2L 1886), August 19 (NMP2L 1888), August 27 (NMP2L 1893), ~~and~~ September 10, ~~1999~~ (NMP2L 1896), SEPTEMBER 30 (NMP2L 1900), DECEMBER 14, 1999 (NMP2L 1917), AND JANUARY 6, 2000 (NMP2L 1923). DECEMBER 30, 1998 (NMP2L 1844),

F. Control of Specifications, Requirements, and Information Relocated from the CTS

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Sections 3.D and 3.E above. The facility and procedures described in the USAR and TRM, which is a part of the USAR, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from the CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements. For example, the Offsite Dose Calculation Manual can be changed in accordance with ITS 5.5.1, and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA Plan for NMP2 and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, will address the implementation of the ITS conversion, and the schedule for the relocation of the CTS requirements into licensee-controlled documents. The relocations to the USAR and TRM shall be included in the next required update of these documents in accordance with 10 CFR 50.71(e).

G. Evaluation of Other TS Changes (Beyond-Scope Issues) Included in the Application for Conversion to ITS

This section addresses the beyond-scope issues in which the licensee proposed changes to both the CTS and STS. The following beyond-scope issues were addressed in the notice of consideration of amendment published in the *Federal Register* on October 20, 1999 (64 FR 56518) and on December 1, 1999 (64 FR 67336).

The changes discussed below are listed in the order of the applicable ITS specification or section, as appropriate (from ITS 3.1.8 to ITS 5.5).

(1) ITS 3.1.8 (DOC L.1) Scram Discharge Volume (SDV) Vent and Drain Valves

The scram discharge volume (SDV) vent and drain valves primary safety function is to isolate the SDV during a scram to contain the reactor coolant discharge. The SDV vent and drain valves are normally open and discharge any accumulated water in the SDV to ensure that sufficient volume is available at all times to allow a complete scram. There are two vents and two drain valves. They close automatically on a scram signal. The isolation function can still be satisfied if at least one valve is operable in each line or the line is isolated. The licensee requested to change the SDV vent and drain valve actions to allow continued operation with one valve in a line inoperable by isolating the line within 7 days and to allow continued operation with two valves inoperable in a line by isolating the line within 8 hours. This is acceptable since one drain/vent valve is available during the short time for the isolation function. These increased allowances are deemed not to substantially increase the risk of a scram with an additional failure that could allow the SDV to remain unisolated; nor to substantially increase the risk of the SDV

EACH

AFFECTED

THE 7 DAY ALLOWANCE IS ALSO

failing to accept the control rod drive water displaced during a scram. Moreover, this allowance has been previously approved for WNP-2 and LaSalle.

(2) ITS 3.3.1.1 (DOC L.4) AND ITS 3.3.6.1 (DOC L.6) MSLRM Scram and MSIV Closure Requirements Deleted

The licensee proposed eliminating the scram and main steam line isolation valve (MSIV) closure requirements associated with the main steam line radiation monitors (MSLRM). This request in conjunction with the General Electric Licensing Topical Report NEDO-31400, and the staff's May 15, 1991, Safety Evaluation (SE) on this topical report, formed the basis for the package to be evaluated.

In the staff's SE, which accepted the referencing of NEDO-31400 for the elimination of the MSIV closure function and scram function of the MSLRM, it was stated that the following three conditions had to be met:

1) *The applicant needed to demonstrate that the assumptions with regard to input values, including power per assembly, Chi/Q (atmospheric dispersion factors), and decay times, that were made in the generic analysis, bound those for the plant.*

2) *The applicant needed to include sufficient evidence, which could be implemented or proposed operating procedures or equivalent commitments, that would provide reasonable assurance that increased significant levels of radioactivity in the main steam lines would be controlled expeditiously to limit both occupational doses and environmental releases.*

3) *The applicant needed to standardize the MSLRM and off gas radiation monitor alarm setpoint to 1.5 times the nominal N^{16} background dose rate at the monitor locations and commit to promptly sample the reactor coolant to determine possible contamination levels in the reactor coolant and the need for additional corrective action, if the MSLRM or offgas radiation monitors or both exceed their alarm setpoints.*

The licensee, in response to Condition 1 above, stated that the assumptions made in the generic analysis of the NEDO bound the NMP2 analysis. Table 1 of the submittal provides a comparison of key input parameters between the NEDO and the NMP2 Updated Safety Analysis Report (USAR) analysis assumptions. All parameters in the NEDO analysis are the same or more conservative than those in the NMP2 analysis except the power level. The effect of this one parameter on doses is more than offset by the atmospheric dispersion factors used in the NEDO analysis. The NEDO values are approximately a factor of ten greater than the NMP2 values. Table 2 of the submittal compares the control rod drop accident dose NEDO results and the NMP2 design basis. This table shows that the NEDO results are greater than those calculated by NMP2 and are well within 10 CFR Part 100 requirements. Based upon these results and the comparison of assumptions provided by the licensee, the staff finds that the licensee's analysis has met the applicable requirements of Condition 1, and is therefore acceptable.

In response to Condition 2, the licensee's submittal indicated that NMP2 has, in place, procedures that ensure that any significant increase in the levels of radioactivity in the main steam lines is promptly controlled. NMP2 procedure N2-SOP-17, *Fuel Failure or High Activity in*

Rx Coolant or Offgas details actions to monitor main steam line and offgas system radiation levels and take reactor coolant samples to determine the extent of fuel failure. If the main steam radiation monitor alarms high, the operator is directed to isolate the source of radiation or scram the reactor to limit further releases. If the offgas radiation monitors indicate an alert or high alarm the operator is instructed to perform a power reduction. Based upon the ability of current procedures to ensure that any significant increase in the levels of radioactivity in the main steam lines and offgas system is promptly controlled to limit further releases, the staff concludes that the licensee's procedures are acceptable and responsive to Condition 2.

In response to Condition 3, NMP2 stated that the Main Steam Line Radiation Monitor alarm setpoint is 1.5 times the Nitrogen-16 background at the monitor location. The alarm will trigger entry into a procedure that will require a reactor coolant sample to be obtained and analyzed. The licensee also stated that offgas pretreatment monitor alarm/trip is set in accordance with the Offsite Dose Calculation Manual to satisfy Current Technical Specification 3.11.2.7. The Technical Specification basis for the setpoint is that by restricting the gross activity rate of noble gases from the main condenser offgas provides reasonable assurance that the total body exposure to an individual at the exclusion area boundary will not exceed a small fraction of the limits of 10 CFR 100 in the event this effluent is inadvertently discharged directly to the environment without treatment. Based upon a review of the licensee's commitment, the staff has determined that Condition 3 has been satisfied.

In addition to these 3 conditions NEDO-31400 addressed a condition in some plants where operating procedures allow continued bypassing of the offgas treatment system until late in the power ascension. The report states that this operating mode is acceptable, provided the offgas radiation monitors are used to automatically isolate the offgas treatment bypass line and/or offgas process line before the acceptable release rates are exceeded. NMP2 procedures allow continued bypassing of the offgas treatment system until late in the power ascension. According to the NMP2 USAR (Chapter 11.5), offgas pretreatment monitors isolate the offgas effluent upon receipt of a high radiation signal. Additionally, in the September 10, 1999, response NMP2 stated that they have performed an evaluation of the offsite and control room doses in the event that a control rod drop accident occurs with the charcoal delay beds bypassed. This evaluation determined that the current licensing bases offsite and control room dose limits bound this scenario. Based upon the automatic isolation capability of this system during a bypass condition and the licensee's evaluation of the offgas system, the staff has determined that NMP2 meets the intent of the NEDO document.

Based on a review of the NMP2 submittal, safety analysis and information provided, the staff concludes that there are no adverse safety implications associated with elimination of the MSIV closure function and scram function of the MSLRM. The licensee has provided reasonable assurance that the radiation exposure levels are within the acceptance criterion of 10 CFR Part 50 General Design Criterion 19, Section 15.4.9 of the Standard Review Plan, and are well within 10 CFR Part 100. Therefore, the staff concludes that the proposed change to eliminate the MSIV closure function and scram function of the MSLRM is acceptable.

(3) ITS 3.3.1.1 (DOC L.10), ITS 3.5.1 (DOC L.8), ITS 3.3.6.1 (DOC L.13), ITS 3.5.2 (DOC L.5) Response Time Testing Note

A note has been added to: CTS 4.3.1.3 (proposed SR 3.3.1.1.16) for the Reactor Vessel Steam Dome Pressure — High and Reactor Vessel Water Level — Low, Level 3 Functions, CTS 4.3.2.3 (proposed SR 3.3.6.1.7 for the Main Steam Line (MSL) Isolation Reactor Vessel Water Level — Low Low Low, Level 1, Main Steam Line Pressure — Low, and Main Steam Line Flow — High Functions, and CTS 4.3.3.3 (proposed SR 3.5.1.8 and SR 3.5.2.7) the ECCS instrumentation associated with each ECCS injection/spray subsystem, that exempts the sensors from response time testing and allows the design sensor response time to be used in the determination of system RESPONSE TIME. Deletion of the response time test for these sensors was evaluated in NEDO-32291 "System Analysis for Elimination of Selected Response Time Testing Requirements," January 1994, and was determined to be acceptable provided the individual licensee referencing this NEDO in a plant specific license amendment request met several conditions stipulated in the generic SER approving NEDO-32291. The evaluation provided below is consistent with the guidance provided in the Staff's generic SER for NEDO-32291.

NMPC has performed a review of NEDO-32291 and determined that the NEDO generic analysis is applicable to NMP2. The equipment affected by the proposed change in the Technical Specifications are the RPS Functions identified above. Prior to installation of a new transmitter/switch or following refurbishment of a transmitter/switch a hydraulic response time test will be performed to determine an initial sensor specific response time value. Applicable NMP2 procedures have been revised/written, as appropriate, to fulfill this recommendation. NMP2 currently does not utilize any transmitters or switches that use capillary tubes in any application that requires response time testing. Therefore, the recommendation that capillary tube testing be performed after initial installation and after any maintenance or modification activity that could damage the lines for transmitters and switches that use capillary tubes is not applicable to NMP2. Applicable calibration procedures have been revised, as appropriate, to include steps to input a fast ramp or a step change to system components during calibrations. Applicable calibration procedures have been revised, as appropriate, to assure that technicians monitor for response time degradation. In addition, technicians have received appropriate training to make them aware of the consequences of instrument response time degradation. Surveillance test procedures have been revised, as appropriate, to ensure calibrations and functional tests are being performed in a manner that allows simultaneous monitoring of both the input and output response of units under test. NMP2's compliance with the guidelines of Supplement 1 to NRC Bulletin 90-01, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount," was reviewed and documented in a safety evaluation transmitted to NMPC by NRC letter dated January 18, 1995. The NRC's evaluation concluded that NMP2's responses to Bulletin 90-01 and Supplement 1 conform to the requested actions of the Bulletin. The elimination of response time testing does not affect NMPC's response to the Bulletin. The system components for which response time testing is proposed to be eliminated has been evaluated and found to be acceptable in NEDO-32291. NMPC has reviewed the vendor recommendations for these components and confirmed that they do not contain periodic response time testing requirements.

The application of the proposed footnote will allow NMPC to use design response time data for the sensor in the determination of the system response time, and eliminate the requirement for a separate measurement of the sensor response time. The remainder of the channel will continue to be tested for response time. Other Technical Specification testing requirements such as CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, CHANNEL CHECK, AND LOGIC SYSTEM FUNCTIONAL TEST in conjunction with actions taken in response to NRC Bulletin 90-01 are sufficient to identify failure modes or degradations in instrument response times and assure operation of the analyzed instrument loops within acceptable limits. The elimination of the response time testing of the identified sensors will reduce the potential for inadvertent actuation of the system. Accordingly, this change will reduce the likelihood of a plant transient due to an inadvertent scram. Accordingly, based on the above evaluation, which is consistent with the guidelines of the Staff's generic SER approving NEDO-32291, the proposed elimination of sensor response time is acceptable. The above change is similar to that approved by the NRC in License Amendment No. 184 for Brunswick Units 1 & 2.

(4) ITS 3 3.1.2 (DOC M.1) SNR Requirements

This change is in a more restrictive requirement that enhances safety and is therefore acceptable.

(5) ITS 3.3.2.2 (DOC L.5) Feedwater System and Main Turbine High Water Level Trip
The purpose of this instrumentation is to ensure that minimum critical power ratio (MCPR) limits are not exceeded during a feedwater controller failure, maximum demand event. This is accomplished by tripping the feedwater pumps and main turbine, with the main turbine trip resulting in a subsequent reactor scram. When the instrumentation is inoperable solely due to an inoperable feedwater pump breaker, the unit can continue to operate with the feedwater pump removed from service (NMP-2 has three 50 percent feedwater pumps). The current NMP-2 TS Table 3.3.9-1 Action 140 requires a reduction in thermal power if the instrumentation is not restored to operable status. The proposed additional required action would allow removal of the associated feedwater pump from service in lieu of reducing thermal power. This required action will be used only if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker. Since this proposed change accomplishes the functional purpose of the instrumentation and still ensures that a MCPR will not be exceeded , this change is acceptable.

(6) ITS 3.3.3.1 (DOC L.1), ITS 3.3.3.2 (DOC L.2), ITS 3.3.8.2 (DOC L.3), ITS 3.3.8.3 (DOC L.3), ITS 3.4.7 (DOC L.3) Six Hour Delay to ~~begin~~ SR

This change adds a note to the Surveillance Requirements that will allow a 6 hour delay from entering into the associated Conditions and Required Actions for a channel placed in an inoperable status solely for performance of required Surveillances provided the other channel in the associated function is operable. The loss of one monitoring assembly is acceptable in this case since only one of the two assemblies is required to maintain function. The short period of time (6 hours) in this condition will have no appreciable impact on risk. Also, upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to operable status or the applicable Condition must be entered and Required Actions taken. Similar 6 hour testing allowances have been granted by the NRC in TS amendments for Georgia Power Company's Hatch Unit 1 (amendment 185) and Unit 2 (amendment 125) and Washington Public

Insert #1 (SER G(6))
For the Post Accident Monitoring (PAM) Instrumentation, this is only allowed

Insert #2 (SER G(6))
For the RPS Electric Power Monitoring Assemblies, this is only allowed provided the other RPS Electric Power Monitoring Assembly for the associated bus maintains trip capability. For the RCS Leakage Detection Instrumentation, this is only allowed provided the other required leakage detection instrumentation is operable. The loss of one PAM channel is acceptable in this case since another channel is operable to monitor the required function. The loss of one remote shutdown instrument channel is acceptable in this case since it does not significantly reduce the probability of monitoring the parameters, when necessary.

Insert #3 (SER G(6))
The loss of one leakage detection channel is acceptable in this case since another channel is operable to monitor leakage.

Power Supply System's WNP-2 (amendment 149, the ITS amendment). This change is acceptable.

(7) ITS 3.3.4.2 (DOC L.4) Removal of Recirculation Pump Breakers from Service

CTS 3.3.4.1 Actions d and e require the unit to be placed in Startup (Mode 2) within 6 hours if the ATWS-RPT instrumentation is not restored within the allowed out-of-service times. The purpose of the ATWS-RPT instrumentation is to trip the recirculation pumps. Therefore, an additional Required Action is proposed, ITS 3.3.4.2 Required Action D.1, to allow removal of the associated recirculation pump breaker(s) from service in lieu of being in MODE 2 within 6 hours. Since this action accomplishes the functional purpose of the ATWS-RPT instrumentation and enables continued operation in a previously approved condition, this change does not have a significant effect on safe operation, and is acceptable.

(8) ITS 3.3.4.2 (DOC M.2) Verification of ATWS Trip Time Delay AND POWER LEVEL

(To be provided)

(9) ITS 3.3.5.1 (DOCs L.11 & M.4), ITS 3.3.8.1 (DOCs L.8 & M.2), ITS 3.3.8.2 (DOCS L.4 , M.2 & M.3), ITS 3.3.8.3 (DOCs L.4, M.2 & M.3) Changes in Allowable Values ~~& Setpoints~~

4

(To Be Provided)

(10) ITS 3.3.6.1 (DOC L.5) Primary containment Isolation Instrumentation

The MODE 1 and 2 Applicability requirements for CTS Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 1.a.3), Reactor Vessel Water Level — Low, Level 3, Trip Function 1.f, RHR Equipment Area Temperature — High, Trip Function 1.k, Reactor Building Pipe Chase Temperature — High, and Trip Function 1.l, Reactor Building Temperature — High have been deleted for the RHR SDC System (Group 5) valves. Trip Function 1.g (ITS Table 3.3.6.1-1 Function 5.c), Reactor Vessel Pressure — High, ensures that the RHR SDC System valves are isolated in MODE 1 and MODE 2 when above the RHR cut-in permissive pressure setpoint, since this Function isolates the valves when above the setpoint. When in MODE 2 below the setpoint, other Technical Specification requirements essentially ensure that RHR Shutdown Cooling is not in service (ITS 3.5.1 requires all LPCI to be OPERABLE in MODE 2, and with RHR aligned to the shutdown cooling mode, LPCI will be inoperable). In addition, plant procedures require that RHR be aligned to the LPCI mode, and the recirculation pumps to operating (which would necessitate securing the shutdown cooling mode) prior to entering MODE 2. Therefore, the deletion of MODE 1 and 2 requirements for these Functions is acceptable.

(11) ITS 3.3.5.1 (DOCs L.9 & L.10) ECCS Instrumentation

Group 4 valves are the residual heat removal (RHR) sample and radioactive waste ~~transfer~~ valves. The isolation function of the Group 4 isolation valves is to isolate and prevent the diversion of low-pressure coolant injection (LPCI) flow. There are only two in-series radwaste ~~transfer~~ valves (2RHS*MOV142, 2RHS*MOV149) and these are in the RHR B subsystem. Also,

there are four sample valves, two in series for each of the two subsystems (2RHR*SOV 35A/B, 2RHR*SOV 36A/B. These valves need to be closed during a LOCA to prevent LPCI flow diversion. These valves are normally closed. The proposed change will require one valve in each flow path to be operable, and the valve that is required to be operable will be the associated electrically divisionalized valve. Since the sample lines are very small and the valves are normally kept closed, the proposed changes are acceptable. The licensee also proposes to delete the technical specification (TS) trip function requirements for the manual isolation pushbutton in the control room for the group 4 valves to close. The manual isolation pushbutton is not assumed in any accident or transient analysis, hence this is acceptable.

(12) ITS 3.3.6.1 (DOC A.7) Primary Containment Isolation Instrumentation, ITS 3.3.5.1 (DOC A.11) ECCS Instrumentation

Group 4 valves 2RHS*MOV142, 2RHS*MOV149, 2RHS*SOV35A/B, 2RHS*SOV36A/B are not containment isolation valves, hence they will be relocated from Table 3.3.6.2 to ECCS Table 3.3 5.1. Relocation of the valves to the ECCS table is acceptable.

(13) ITS 3.3.8.1 (DOC L.2) DG Degraded Voltage

The current Technical Specifications require three Loss of Voltage channels and three Degraded Voltage channels for each division (even though the Minimum Channels OPERABLE column requires only two channels, Action 39 implies that three channels, as stated in the Total Number of Channels column, are required). The Division 1, 2, and Division 3 Loss of Voltage logic and Degraded Voltage logic is two-out-of-three. The instrumentation is a support system to the 4160 V ESF buses and DGs, which themselves are support systems to the various systems they provide power to. It is overly conservative to require a support system to a support system to be single failure proof. The DGs and ESF buses are designed to meet the single failure criterion, i.e., one DG and associated ESF buses is assumed to fail in the accident analyses. Therefore, ITS 3.3.8.1 only requires two Division 1, 2, and 3 Loss of Voltage channels and Degraded Voltage channels per division to be OPERABLE. A single failure of any one of these required channels will only result in the loss of one DG and associated bus which is no worse than the loss of a single DG and associated bus for any other reason (e.g., failure of DG breaker to function properly). This is also consistent with the number required by the Minimum Channels Operable column in CTS Table 3.3.3-1, and therefore this change is acceptable.

~~(14) ITS 3.3.8.1 (DOC L.7) Condition Requirements changed~~

~~(To be provided)~~

(15) ITS 3.3.5.1 (DOC L.6) ECCS Instrumentation

Group 4 valves are the RHR sample and radioactive waste ~~transfer~~ valves. The isolation function of the Group 4 valves is to isolate and prevent the diversion of LPCI flow. In the current TS, Group 4 valves are treated as primary containment isolation valves (PCIVs) and therefore plant shutdown is required if the instrumentation associated with them becomes inoperable. The proposed change will remove their designation as PCIVs and therefore the actions will be specified to isolate the affected RHR line in lieu of a plant shutdown. This is acceptable.

(16) ITS 3.3.5.1 (DOC L.3) ECCS Instrumentation

The reactor pressure at which the automatic depressurization system is required to be operable is changed from 100 psig to150 psig. The low-pressure emergency core cooling system (ECCS) is capable of injecting water to the reactor for pressures well above 150 psig. Hence the proposed change is acceptable.

(17) ITS 3.3.5.1 (DOC M.6) ECCS Instrumentation

The licensee added the high-pressure core spray pump suction pressure timer to the TS. The timer is provided to preclude spurious automatic suction source swaps from the condensate storage tank to the suppression pool ~~and vice versa~~. Appropriate actions and surveillance have also been added. This is acceptable.

(18) ITS 3.3.8.1 (DOC L.6) Channel Check Requirements

The CTS ~~Section~~ SR 4.3.3.1 channel check requirement for the LOP channels is not retained in the proposed NMP-2 ITS. Undervoltage relays are used to perform these functions and these relays are either in the tripped or not tripped condition, depending on the sensed voltage relative to the trip setpoint. There are no readout indication provided that can be used to compare these devices to the indications of other similar devices measuring the same parameter. The LOP channel check requirement is currently fulfilled by verifying each undervoltage relay is not tripped as indicated by the associated annunciators not providing an alarm. The current channel check provides a comparison of the tripped and not tripped status of the undervoltage relays, but does not provide indication of the overall condition of the undervoltage relays in excess of that provided by the annunciators. Thus, the verification of this status on a 12-hour frequency does not provide any additional information that is not continuously available to the plant operations staff through the absence of an actuated annunciator. However, consistent with the CTS requirement, ITS SR 3.3.8.1.1 requires LOP channel functional testing to be performed every 31 days. On these bases, this revision is acceptable.

(19) ITS 3.4.1 (DOC M.2) ~~TP Regions~~ STABILITY MONITORING POWER-TO-FLOW VERIFICATION

CTS 3.4.1.1.b requires the THERMAL POWER to be in the unrestricted zone of Figure 3.4.1.1-1. However, there is no Surveillance Requirement that verifies this requirement on a periodic basis. ITS SR 3.4.1.1 has been added to verify operation is in the "Unrestricted Zone" of ITS Figure 3.4.1-1 every 12 hours. This will ensure that entry into a region where potential instabilities can occur will not go undetected. Therefore, this change is more restrictive on plant operations and is acceptable.

(20) ITS 3.4.1 (DOC L.1) ~~Recirculation Loops operating~~ APRM AND LPRM NEUTRON FLUX NOISE VALUE DETERMINATION

~~The proposed TS meets the intent of the NRC Bulletin 88-07, Supplement 1, "Interim Corrective Actions for Thermal Hydraulic Stability", dated December 30, 1988. The licensee is also committed to implement Option 3 of the permanent long term solutions described in NRC Generic Letter 99-02. Even though the proposed TS allows operation in the unrestricted zone for up to 2 hours when both recirculation pumps trip, administrative procedures require the~~

→ INSERT FROM DOC L.1 ATTACHED

TECHNICAL CHANGES - LESS RESTRICTIVE

LA.9 (cont'd) Action B.1 will continue to require the APRM and LPRM noise levels to be verified to be ≤ 3 times baseline noise levels if operating in the restricted zone. As such, the requirement to have a baseline will still exist in the ITS and will ensure the baseline noise levels are properly determined. Therefore, the relocated requirement is not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the Bases will be controlled by the provisions of the proposed Bases Control Program described in Chapter 5 of the ITS.

"Specific"

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L.1 CTS 4.4.1.1.4 requires a baseline APRM and LPRM neutron flux noise value to be determined within 2 hours after entering the region for which monitoring is required. This requirement has been extended to 8 hours in the ITS, in the form of requiring the APRM and LPRM noise levels to be verified ≤ 3 times baseline noise levels within 8 hours of entering the restricted zone (ITS 3.4.1 Required Action B.1). The APRM and LPRM baseline noise levels must be known in order to perform this Required Action. The extended time to determine baseline levels the first time the region is entered after a refueling outage is consistent with the time provided in CTS 3.4.1.1 Action c to determine the APRM and LPRM noise levels are within limits. In addition, this time is acceptable since an alarm will alert the operators of a stability related power oscillation. This alarm is provided by the NUMAC Power Range Neutron Monitoring System, which has been installed during the most recent refueling outage as part of NMPC's response to Generic Letter 94-02, "Long Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors." The Technical Specification Amendment Request describing the addition of this alarm was provided in NMPC letter NMP2L-1735, dated October 31, 1997 and was approved by the NRC as documented in the NRC Letter dated April 15, 1998. The alarm is currently being tested and it is planned to be in operation prior to the implementation of the ITS.

L.2 The required action of CTS 3.4.1.3 Action b to shut down one of the recirculation loops when the flow mismatch is not within limits has been deleted. It has been replaced with a requirement (ITS 3.4.1 ACTION E) to declare the loop with the low flow "not in operation." Once the declaration has been made, the appropriate actions for single loop operation must be taken in accordance with CTS 3.4.1.1 (ITS 3.4.1). While a shutdown of the loop may be preferred under some conditions, declaring a pump not in operation will ensure the proper actions are taken in accordance with the single loop analysis.

operators to take immediate action to restore operating parameters to the unrestricted zone. Since the licensee follows the staff guidelines described in NRC Bulletin 88-07, Supplement 1, the proposed TS changes are acceptable.

(21) ITS 3.4.4 (DOC L.1) SRV set point tolerance change to +/-3 percent

[This change is part of the NMP-2 power uprate technical specification amendment request and will be addressed in the power uprate staff SER.]

(22) ITS 3.4.5 (DOC L.1) Surveillance Requirement Frequency Change

The Surveillance Frequency for CTS 4.4.3.2.1.b (ITS SR 3.4.5.1), has been changed from 8 hours to 12 hours, consistent with the allowance in Generic Letter 88-01, Supplement 1. The supplement allows the Frequency to be extended to once per shift, not to exceed 12 hours. NMP2 currently has a 12 hour operating shift, thus, the Frequency is adjusted to coincide with this. This is also consistent with the CTS Frequency for monitoring the airborne monitors. The staff believes that there is reasonable assurance that plant operation in this manner poses no undue risk to the health and safety of the public and therefore concludes that a surveillance frequency of 12 hours is acceptable for SR 3.4.5.1.

(23) ITS 3.5.1 (DOC L.1) ADS Valve Requirement

The number of ADS valves required to be OPERABLE in CTS 3.5.1.a and 3.5.1.b is proposed to be reduced from seven to six. CTS 3.5.1 Actions e.1 and e.2, which allow up to two of the seven ADS valves to be inoperable for a period of time prior to requiring a shutdown, and CTS 4.5.1.e.2.b), which requires each ADS valve to be opened, have also been revised to reflect this change. Also, the change would allow only one ADS valve to be inoperable for up to 14 days. This change is based on the analysis summarized in Chapter 15C and in the reload analysis of Appendix A of the USAR. This analysis demonstrates adequate core cooling is provided during a small break LOCA and a simultaneous HPCS diesel generator failure (limiting LOCA) with two of the seven ADS valves out-of-service. This change reflects the credit provided through the use of NRC approved methods for calculating more realistic (yet conservative) peak cladding temperatures during accident situations. In addition, the two ADS valves out of service was approved by the NRC as documented in the initial "Safety Evaluation Report Related to the Operation of NMP2," Docket No. 50-410, Supplement No. 4 (NUREG-1047-SSER). Staff approved evaluation models were used for the analysis. The proposed time of 14 days for one ADS valve to be inoperable is relatively short and the 5 remaining ADS valves would be operable during this short period for ADS function. During a postulated LOCA, the operators would use the EOPs, which instruct them to prevent ADS actuation if possible. The operator needs only 2 or 3 SRVS out of the total 16 SRVs for manual depressurization of the RPV. The Staff concludes that the licensee requests to: (1) change the minimum number of operable ADS valves during normal power operation for ECCS function from 7 to 6, and (2) change the allowable outage time for one inoperable ADS valve to 14 days, are acceptable.

15

(24) ITS 3.5.1 (DOC L.7) ADS Valve ~~Cycle~~ Testing

CTS 4.5.I.e.2.b requires each ADS valve to be manually opened at power at least once per 18 months. Specifically, an ADS valve disk is physically lifted by energization of an actuator solenoid, which admits nitrogen gas to a pneumatic actuator cylinder. During this test, reactor vessel steam is passed through the valve body to the suppression pool. Proposed surveillance requirement (SR) 3.5.1.7 and its Bases would permit less frequent testing of the ADS valves using an alternate approach, described below, whereby the disk is not lifted off its seat at power. The licensee proposes that each ADS actuator could be tested using either method (the current method or this alternate method).

The licensee proposes a revision to CTS 4.5.1.e.2.b to allow an alternate method of testing the ADS S/RVs. CTS 4.4.2 and CTS 4.0.5 (proposed SR 3.4.4.1 and Specification 5.5.6, respectively) require a sample population of the S/RVs to be removed and bench tested for safety-mode lift setpoint during each refueling outage to satisfy ASME Code, Section XI testing requirements. During this bench testing, the S/RVs are also stroked using the relief-mode actuator. The licensee states that safety-mode and the relief-mode bench testing of the sample population demonstrates that each installed S/RV will function properly in the safety-mode and in the relief-mode, and that the actuator of the currently installed S/RVs would successfully function. After each ADS valve is reinstalled following a bench test and after all control systems are reconnected, proposed SR 3.5.1.7 would require each ADS valve actuator to be uncoupled from its valve stem, manually actuated, and then recoupled to the valve stem. The licensee states that this proposed alternate approach verifies that the ADS controls have been properly installed prior to plant startup, without physically lifting the disk off its seat. In addition, the licensee proposes that the remaining ADS valves that have not been removed for Section XI testing during a refueling outage would be tested in a similar manner.

The staff has reviewed the licensee's proposed technical specification changes and finds that DURING THE PERFORMANCE OF the current requirements result in opening the ADS S/RVs during power operation which could contribute to valve leakage, a stuck-open valve, the additional operation of other ECCS equipment, loss of power generation, and additional radiation exposure. The proposed alternate testing provides for actual stroking of the S/RV disks ~~after performing~~ the ASME Code setpoint testing on a sample of valves combined with stroking of the actuators after valves have been reinstalled. The staff finds that the alternate testing provided by the proposed surveillance requirement 3.5.1.7 results in the following differences between the CTS 4.5.1.e.2.b testing requirements and the proposed test requirements: (1) the proposed testing does not verify by actual stroking that the installed valve stem is properly coupled to the actuator, (2) the proposed sample testing required by the ASME Code is less frequent than the current requirement to test all ADS S/RVs each 18 months, and (3) the proposed testing does not verify, by successfully discharging the S/RVs, that the attached piping is not blocked.

The potential concern regarding the first difference is that the stem may not be properly coupled to the actuator by the proper position of the stem mounted roller bearing assembly after the S/RVs are installed and the actuators are stroked. However, the staff finds that the licensee's procedure of independently checking the repositioning of the actuator connection to the stem provides the necessary assurance of proper connection and adequately addresses this concern.

The potential concern regarding the second difference is that the S/RVs may not be adequately reliable if they are only setpoint tested and stroked at the ASME Code required frequency. The ASME Code requires these tests at a nominal frequency of once each five years with a minimum of 20% tested within 24 months. While this is significantly less frequent than the current 18-month frequency, the staff finds this acceptable since the staff has determined that meeting the Code requirement is acceptable for testing valves of this type. The ASME Code requires stroking of the S/RVs only when setpoint tests, or maintenance or repair activities, are performed.

Regarding the third difference, the licensee's foreign materials exclusion controls provide adequate assurance that no obstruction will be admitted into the S/RV discharge piping. The staff finds that this provides the necessary assurance of no obstruction in the discharge piping and is acceptable for addressing this concern.

Based on the above evaluation, the staff concludes that the proposed revised testing of the ADS S/RVs which demonstrates their depressurization function without the need for actually stroking the valve disks off the valve seats while the plant is at power, is acceptable. Therefore, the proposed SR 3.5.1.7 as a replacement for CTS 4.5.1.e.2.b is acceptable.

(25) ITS 3.6.1.2 (DOC L.5) SR Frequency change

(To be provided)

~~(26) ITS 3.6.1.7 (DOC A.2) Vacuum Breaker LCO Note~~

~~(To be provided)~~

~~(27) ITS 3.6.1.7 (DOC A.3) Vacuum Breaker Required Action divided~~

~~(To be provided)~~

(28) ITS 3.6.1.3 (DOC L.9) Excess Flow Check Valve requirement to check flow is deleted

(To be provided)

~~(29) ITS 3.6.1.3 (DOC L.19) Suspension of SGT Purge & Vent~~

~~(To be provided)~~

(30) ITS 3.6.1.6 (DOC L.1), ITS 3.6.2.4 (DOC L.1) Spray Flows SR

(To be provided)

(31) ITS 3.6.3.1 (DOC LA.2) SR Requirement change

(To be provided)

(32) ITS 3.7.2 (DOC L.1) CREF Required Actions

CTS 3.7.3 Actions a and b.1 provides a 7 day restoration time when one CREF subsystem is inoperable. The CTS does not provide a restoration time when both CREF subsystems are inoperable; either LCO 3.0.3 must be entered (if in MODE 1, 2, or 3) or the CTS 3.7.3 Action b.2 must be taken (during Core Alterations, handling irradiated fuel, or OPDRVs). ITS 3.7.2 ACTION A will allow a 7 day restoration time when both CREF subsystems are inoperable, provided the CREF System safety function is maintained. ITS 3.7.2 ACTION D will require entry into 3.0.3 (if in MODE 1, 2, or 3) and ITS 3.7.2 ACTION E will require the unit to suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), if both CREF subsystems are inoperable and CREF System safety function is not maintained. The NMP2 CREF System design includes two filter trains and four air handling unit fans. For the CREF System to perform its design function, one filter train and two air handling unit fans are required. Two CREF subsystems are provided, with each subsystem consisting of one filter train and two air handling unit fans, all from the same electrical power division. Due to this design, when both subsystems are inoperable, the capability for the CREF System to perform its design function may still exist. (FOR EXAMPLE, if the Division 1 filter train and the Division 2 relay room air handling unit fan are inoperable, sufficient components are OPERABLE for the CREF System to meet its safety function (using the Division 2 filter train, the Division 1 relay room air handling unit fan, and either the Division 1 or 2 control room area air handling unit fan). Therefore, since this alignment is equivalent to having one CREF subsystem fully OPERABLE, the 7 day restoration time is acceptable, provided the CREF System safety function is maintained. The 7 day restoration time is identical to that already allowed in the CTS when one CREF subsystem is inoperable. In the current condition allowed by the CTS, the remaining OPERABLE subsystem will perform the CREF System safety function, assuming no additional single failure. The proposed condition will still ensure the remaining OPERABLE components of the two subsystems can perform the CREF safety function, assuming no additional single failure. If the remaining components of the CREF subsystems cannot maintain the CREF System safety function, then the unit will be required to enter LCO 3.0.3 (if in MODE 1, 2, or 3), or the unit must suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), consistent with the current requirements. In addition, this concept is consistent with the ECCS Specification in NUREG-1430, NUREG-1431, and NUREG-1432, which allow multiple ECCS trains to be inoperable for the same length of time as is currently allowed for one train only, provided 100% of the flow equivalent to a single ECCS train is available.

Due to this change, CTS 3.7.3 Action b.1 (ITS 3.7.2 Required Action C.1) has been revised to require the Operable components of CREF subsystem(s) equivalent to a single CREF subsystem to be placed in operation in lieu of placing the Operable subsystem in operation. The purpose of the current Action to place the subsystem in operation, is to ensure that the remaining subsystem is Operable, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected. Since this change does not impact the purpose of the Action (the three listed reasons remain valid), this change is acceptable.

(33) ITS 3.7.3 (DOC L.4) ~~CREF Required Actions~~ CONTROL ROOM ENVELOPE AC SYSTEM

CTS 3.7.3 Actions a and b.1 provides a 7 day restoration time when one control room envelope AC subsystem is inoperable. The CTS does not provide a restoration time when both control

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room envelope AC subsystems are inoperable; either LCO 3.0.3 must be entered (if in MODE 1, 2, or 3) or the CTS 3.7.3 Action b.2 must be taken (during Core Alterations, handling irradiated fuel, or OPDRVs). ITS 3.7.3 ACTION A will allow a 30 day restoration time when both control room envelope AC subsystems are inoperable, provided the Control Room Envelope AC System safety function is maintained. ITS 3.7.3 ACTION D will require entry into 3.0.3 (if in MODE 1, 2, or 3) and ITS 3.7.3 ACTION E will require the unit to suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), if both control room envelope AC subsystems are inoperable and Control Room Envelope AC System safety function is not maintained. If the Division 1 control room area and the Division 2 relay room air handling units are inoperable, ~~with~~ sufficient components ARE operable for the Control Room Envelope AC System to meet its safety function (using the Division 2 control room area air handling unit and the Division 1 relay room air handling unit). Since this alignment is equivalent to having one control room envelope AC subsystem fully OPERABLE, the 30 day restoration time is acceptable, provided the Control Room Envelope AC System safety function is maintained. The 30 day restoration time is consistent to that allowed by NUREG-1434 and adopted in the ITS when one control room envelope AC subsystem is inoperable. In the current condition allowed by the CTS, the remaining OPERABLE subsystem will perform the Control Room Envelope AC System safety function, assuming no additional single failure. The proposed condition will still ensure the remaining OPERABLE components of the two SYSTEM subsystems can perform the Control Room Envelope AC safety function, assuming no additional single failure. If the remaining components of the control room envelope AC subsystems cannot maintain the Control Room Envelope AC System safety function, then the unit will be required to enter LCO 3.0.3 (if in MODE 1, 2, or 3), or the unit must suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), consistent with the current requirements. In addition, this concept is consistent with the ECCS Specification in NUREG-1430, NUREG-1431, and NUREG-1432, which allow multiple ECCS trains to be inoperable for the same length of time as is currently allowed for one train only, provided 100% of the flow equivalent to a single ECCS train is available.

Due to this change, CTS 3.7.3 Action b.1 (ITS 3.7.3 Required Action C.1) has been revised to require the Operable components of control room envelope AC subsystem(s) equivalent to a single control room envelope AC subsystem to be placed in operation in lieu of placing the Operable subsystem in operation. The purpose of the current Action to place the subsystem in operation, is to ensure that the remaining subsystem is Operable, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected. Since this change does not impact the purpose of the Action (the three listed reasons remain valid), this change is acceptable.

(34) ITS 3.8.1 (DOC L.9) Revising the Required Loading Kilowatt Values for the 24-Hour Emergency Diesel Generator Surveillance

The CTS 24-hour EDG SR 4.8.1.1.2.e.8 requires that the Divisions I and II EDGs operate loaded to ≥4840 kW for the first 2 hours of the test and to ≥4400 kW for the remaining 22 hours. This CTS SR also requires that the Division III EDG operate loaded to ≥2860 kW for the first 2 hours of the test and to ≥2600 kW for the remaining 22 hours. The corresponding proposed ITS SR 3.8.1.12 requires that the Divisions I and II EDGs operate with a load of ≥4620 kW and ≤4840 kW for ≥2 hours of the test and with a load of ≥3960 kW and ≤4400 kW for the remaining hours

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The NMP2 Control Room Envelope AC System design includes four air handling units. For the Control Room Envelope AC System to perform its design function, two air handling units are required. Two Control Room Envelope AC subsystems are provided with each subsystem including two air handling units, both from the same electrical power division. Due to this design, when both subsystems are inoperable, the capability for the Control Room Envelope AC System to perform its design function may still exist. For example,

of the 24-hour test. This ITS SR also requires that the Division III EDG operate with a load of ≥2730 kW and ≤2860 kW for ≥2 hours of the test and with a load of ≥2340 kW and ≤2600 kW for the remaining hours of the 24-hour test.

The proposed ITS SR 3.8.1.12 relaxes the loading requirements for the EDG 24 hour surveillance test. The revised 22 hour loading requirement for each EDG is 90% - 100% of the continuous rating of the EDG. The revised 2 hour loading requirement for each EDG is 105% - 110% of the continuous rating of the EDG. These new proposed load range values for the EDG 24 hour tests are consistent with the recommendations contained in Regulatory Guide 1.9, Revision 3, "Selection, Design, Qualification, And Testing Of Emergency Diesel Generator Units Used As Class 1E Onsite Electric Power Systems At Nuclear Power Plants." These new load range values preclude routine overloading of the EDGs while the lower values provide assurance that the EDGs are at operating temperatures. In addition, the proposed ITS SR continues to provide assurance that the EDGs will carry normal and rated loads, and therefore is acceptable.

(35) ITS 3.8.1 (DOC L.15) Revision of the Currently Required Time for the Emergency Diesel Generators to Start and Energize the Emergency Buses From a Loss of Voltage Signal

The CTS SRs 4.8.1.1.2.e.4.a) 2) and 4.8.1.1.2.e.4.b) 2) require the EDGs to start and energize the emergency buses within 13 seconds of a loss of offsite power signal. The proposed corresponding NMP-2 ITS SR 3.8.1.9 requires the EDGs to start and energize the emergency buses within ~~13.12~~ 13.20 seconds. This proposed time is the summation of the current EDG start time of 10 seconds from various CTS Section 4.8.1.1 surveillances and the EDG loss of voltage time delay allowable value from the CTS Table 3.3.3-2. This is also the time assumed in the accident analysis for the EDG to start when only a loss of voltage occurs. The time of 13 seconds provided in the CTS SRs is the allowed EDG start and emergency bus energization time rounded to the nearest whole second. Hence, this revision makes the EDG start and emergency bus energization time required in CTS SRs 4.8.1.1.2.e.4.a)2) and 4.8.1.1.2.e.4.b)2) consistent with the currently allowed times provided in other portions of the CTS. This revision is therefore an administrative item and is acceptable.

(36) ITS 3.8.2 (DOC L.4) Addition of a Note Which Exempts Surveillances Pertaining to Emergency Diesel Generator Starting on a LOCA Signal and a LOCA/LOOP Signal While in Modes 4 and 5, ~~Plant Conditions~~ and During Handling of Irradiated Fuel in the Secondary Containment

~~The~~ CTS ~~Section~~ 4.8.1.2 which provides the surveillance requirements for alternating current sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires CTS ~~SR~~ 4.8.1.1.2 to be performed. Two of these surveillances are the EDG start on an ECCS initiation signal and the EDG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. A note has been provided with the proposed NMP-2 ITS SR 3.8.2.1 which exempts these two surveillances when the associated ECCS subsystems are not required to be operable. The CTS and the NMP-2 ITS do not require the ECCS subsystems to be operable in Mode 5 when the spent fuel storage pool gates are removed and water level is ≥22 feet 3 inches above the top of the reactor pressure vessel flange. The CTS and the ITS also do not require the ECCS subsystems to be operable when

AND DURING HANDLING OF IRRADIATED FUEL IN THE SECONDARY CONTAINMENT,

defueled. The EDGs are required to support the equipment powered from the emergency buses. However, when the ECCS subsystems are not required to be operable, then there is no technical reason to require the EDG to autostart on an ECCS initiation signal since this results in a requirement for the support system to be operable when the supported system is not required to be operable. In addition, the ECCS initiation signal is an anticipatory start signal for the EDGs which are only needed during a LOCA if a loss of offsite power occurs. The requirement to autostart required EDGs on a loss of offsite power signal is retained in the proposed ITS SR 3.8.1.9. Thus, when in Modes 4 and 5 ~~plant conditions~~, when the associated ECCS subsystems are not required to be operable, there is no reason to require the EDGs to be capable of automatically starting on an ECCS actuation signal either alone or concurrent with a loss of offsite power signal. On this basis, this revision is acceptable.

(37) ITS 3.8.3 (DOC M.2)Increasing the Fuel Oil Storage Tank Limits for the Divisions I and II Emergency Diesel Generators as Well as the Six Day Limits for All Emergency Diesel Generators

CONDITION A

The CTS ~~Sections~~ LCOs 3.8.1.1.a.2 and 3.8.1.2.b.2 require the level of the Divisions I and II EDG fuel oil storage tanks to be ≥47,547 gallons. In addition, CTS ~~Section~~ 3.8.1.1 Action j and ~~Section~~ 3.8.1.2 Action d require the 6-day fuel oil storage tank levels to be ≥40,755 gallons for Division I and II EDGs and ≥30,293 gallons for the Division III EDG. The level for Divisions I and II EDG fuel oil storage tanks is increased in proposed ITS SR 3.8.3.1 to ≥50,000 gallons and the 6 day levels are increased in ITS ~~Section~~ 3.8.3 to ≥44,000 gallons for Divisions I and II fuel oil storage tanks and to ≥30,813 gallons for the Division III EDG storage tank. These proposed values are based on the most recent calculations, which increase the amount of fuel oil needed. These values provide assurance the EDGs have sufficient fuel oil to operate for the assumed 7 days and 6 days, respectively. These revised proposed EDG fuel oil storage tank limits are more restrictive on plant operations and provide additional requirements not include in the CTS and are acceptable.

(38) ITS 3.8.4 (DOC L.3) Revision of the Battery Load Profile to be Consistent With the Load Profile Specified in the Updated Safety Analysis Report

~~The~~ CTS ~~Section~~ SR 4.8.2.1.d.2 requires battery service test capacity to be adequate to supply specific dummy load current profiles while maintaining the battery terminal voltage ≥105 volts for Divisions I and II and ≥112.5 volts for Division III. For the Division I battery, the CTS require a dummy load current profile of ≥818 amperes during the initial 60 seconds; ≥445 amperes during the next 118 minutes; and ≥701 amperes during the remaining ~~of~~ PER the 2-hour test. For the Division II battery, the CTS require a dummy load current of ≥570 amperes during the initial 60 seconds; ≥449 amperes during the next 118 minutes; and ≥505 amperes during the remainder of the 2-hour test. For the Division III battery, the CTS require a dummy load current of ≥54.6 amperes during the initial 60 seconds and ≥15.4 amperes during the remainder of the 2-hour test. The proposed ITS revises the required battery service test dummy load current profile for each battery and proposes to relocate the revised battery service test current profiles to the ~~battery surveillance testing procedures~~ USAR. From the markup copy of the CTS for the Division I battery, the ITS require a dummy load current of ≥721 amperes during the initial 60 seconds; ≥234 amperes during the next 118 minutes; and ≥570 amperes for the remainder of the 2-hour test. From the markup copy of the CTS for the Division II battery, the ITS require a dummy load

current of ≥301 amperes during the initial 60 seconds; ≥193 amperes during the next 118 minutes; and ≥223 amperes during the remainder of the 2-hour test. From the markup copy of the CTS for the Division III battery, the ITS require a dummy load current ≥47.9 amperes during the initial 60 seconds and ≥15.4 amperes during the remainder of the 2-hour test.

~~The~~ CTS ~~Section~~ SR 4.8.2.1.d.2 requires specific current rates to be used for battery service testing with a dummy load. The CTS required dummy load current profiles were consistent with the load profiles provided in the USAR Tables 8.3-8, 8.3-9, and 8.3-10 for Divisions I, II, and III, respectively, at the time of issuance of the low power operating license for NMP-2. The load current profiles currently provided in these USAR tables were revised since the issuance of the low power license for NMP-2. The proposed NMP-2 ITS SR 3.8.4.7 does not specify dummy load current profile rates for battery service testing, but the above current profile rates are consistent with the battery load current profiles currently provided in the USAR Tables 8.3-8, 8.3-9, and 8.3-10. The service test dummy load ~~testing requirement is~~ reduced for each of the three divisional batteries for every period of duty cycle with the exception of one duty cycle for the Division III battery. Specifically, the 1 to 120 minute duty cycle for the Division III battery remains unchanged at 15.4 amperes. The service test dummy load current profiles are reduced to be consistent with actual emergency loads and the as-built condition of the plant. However, the revised service test load current profiles continue to include all necessary loads to support the operation of safety-related equipment under design basis accident LOCA conditions. With the revised required current profiles, the spare capacity is increased for each of the divisional batteries by decreasing the demand on each battery. Thus, the proposed ITS revised requirement for battery service testing is acceptable since it continues to demonstrate the batteries have capability to supply power to all required safety loads consistent with design requirements.

CURRENT PROFILES ARE

(39) ITS 3.8.4 (DOC L.4) Addition of an Allowance to Perform a Battery Modified Performance Discharge Test Every Cycle in Lieu of a Battery Service Test ~~and Revision to the Required Frequency for Performing a Battery Performance Discharge Test for a Degraded Battery~~

~~The~~ CTS ~~Section~~ SR 4.8.2.1.e allows a battery performance discharge test to substitute for the battery service test once every 60 months. Note 1 provided with the proposed ITS SR 3.8.4.7 allows a modified performance discharge test to be substituted for the battery service test. In addition, the modified performance discharge test is allowed to be substituted for the battery service test at any time. The modified performance discharge test consists of ~~an 8-hour duty cycle with~~ two rates. The one minute rate published for the battery or the largest current load of the duty cycle followed by the test rate used for the performance discharge test. This test may consist of a single current rate if the test current rate used for the performance discharge test exceeds the one minute current rate. The service test consists of a two-hour duty cycle with two or three current rates, depending on the battery being tested. The one minute rate for the largest current load of the duty cycle, the current rate based on the steady state loads of the duty cycle from 1 minute to 119 minutes, and a final one minute current rate based on the cycling loads of the duty cycle. For the NMP-2 plant, the second test current rate to be used for the modified performance discharge test is greater than both the steady state and the cycling loads (1 minute through 120 minutes) of the service test. Thus, for the NMP-2 plant, the modified performance discharge test is a more severe test of the battery than the service test. To assure that the modified performance discharge test can only be used as a substitute as long

NORMALLY

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as it remains a more severe test of the battery, Note 1 of the proposed ITS SR 3.8.4.7 only allows the substitution as long as the modified performance discharge test current completely envelops the service test current. The proposed revision also permits the NMP-2 licensee to perform the modified performance discharge test every refueling outage, in lieu of the service test. Performing the modified performance discharge test, every refueling outage allows for better trending of battery capacity with more data points over an expected 20-year battery service life. At the same time, the service use of the battery is continuing to be verified. This will also allow the licensee to more accurately identify when the battery is approaching degradation so that corrective action can be taken in a timely manner. The additional deep discharges that will result from performing the modified performance discharge test more frequently will not significantly affect the batteries since each battery is designed for 30 such discharges. Performing a modified performance discharge test every 24-months results in 10 deep discharge cycles over an expected 20-year battery service life and thus 20 such cycles remain for any plant DC (direct current) system challenges. On this technical basis, the ITS proposed requirement revisions are acceptable.

In addition, the CTS Section 4.8.2.1.f requires performing a battery performance discharge test every 18 months when the battery shows degradation or has reached 85% of its expected service life. A battery can have loss of capacity prior to expiration of its expected service life. In this case, a more restrictive frequency for performing battery performance discharge testing is warranted. The proposed ITS SR 3.8.4.8 requires battery performance discharge testing every 12-months when a battery shows degradation or has reached 85% of its expected life with capacity <100% of the manufacturer's rating and every 24-months when a battery has reached 85% of the expected life with capacity ≥100% of the manufacturer's rating. These revised frequencies for performing battery performance discharge testing are consistent with the guidance provided in NUREG-1434, and are acceptable.

(40) ITS 3.8.7 (DOC M.1) Requiring the Inverters to be Powered From an Uninterruptible Power Source (Direct Current Source)

The CTS ~~Sections~~ LCOs 3.8.3.1.a.1.c and 3.8.3.1.a.2.c require the energization of the Divisions I and II 120-volt AC (alternating current) distribution panels be from the inverters identified as 2VBA*UPS2A and 2VBA*UPS2B, respectively. A footnote for these CTS ~~sections~~ LCOs requires the inverters to be energized from their normal AC supply or their backup DC (Direct Current) supply. The proposed NMP-2 ITS ~~Section~~ 3.8.7, revises the footnote requirement to clearly define that an operable inverter is one that has the capability of being supplied without interruption from its associated DC source, which is consistent with how the CTS requirement is implemented by plant procedures. Each inverter is normally supplied by its associated normal AC source. If the normal AC source is not available, the DC source is designed to supply the associated inverter and the inverter may be considered operable. This provides assurance that the inverter is capable of supplying the loads without interruption. An uninterruptible supply is required to support the design basis accidents to assure proper emergency core cooling system operation. In addition, the inverters are also required to support other technical specifications equipment such as the reactor core isolation cooling system. Since the words in the CTS footnote do not specifically require uninterruptible power supplies (that is, either the AC or the DC supply can be used to energize an inverter), this ITS revision is a more restrictive requirement on plant operations, and is acceptable.

(41) ITS 5.5.2.b (DOC A.2) Addition of SR Note

This an administrative change, consistent with the current practices, that has no adverse effect upon safety and is therefore acceptable.

4.0 COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversion for NMP2, the staff has relied upon the licensee commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table R, "Relocated Specifications and Removal of Details Matrix," attached to this SE. This table reflects the relocations described in the licensee's submittals on the conversion. The staff requested and the licensee submitted a license condition to make this commitment enforceable (see Section 5.0). Such a commitment from the licensee is important to the ITS conversion because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by the regulations (e.g., in accordance with 10 CFR 50.59).

5.0 LICENSE CONDITIONS

A license condition to define the schedule to begin performing the new and revised SRs during or after the implementation of the ITS is to be included in the license amendment issuing the ITS. This schedule is:

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

The staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule. The licensee's implementation ~~date is within 90 days of the date of issuance of this amendment~~. This implementation schedule is acceptable. ~~shall be completed~~ no later than August, 2000,

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are provided in Table R, "Relocated Specifications and Removal of Details Matrix," and section 3.E above, "Relocated Entire CTS

Specifications." The license condition states that the relocations would be completed, during the implementation of the ITS, ~~to be completed by August 1, 2000~~. This schedule is acceptable.
← No later than August, 2000 and the relocations to the Updated Safety Analysis Report shall be completed in accordance with 10 CFR 50.71(e).

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the ~~Michigan State~~ official was notified of the proposed issuance of the ITS conversion amendment for NMP2. The State official had no comments.
↑ NEW YORK STATE

7.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on [December XX, 1999 ← NRC INSERT INFO (64 FR XXXXX], for the proposed conversion of the CTS to ITS for NMP2. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

8.0 CONCLUSION

The NMP2 ITS provides clearer, more readily understandable requirements to ensure safer operation of the plant. The NRC staff concludes that the ITS for NMP2 satisfy the guidance in the Final Policy Statement on TS improvements for nuclear power reactors with regard to the content of TS, and conform to the STS provided in NUREG-1433, Revision 1, or NUREG-1434, Revision 1, with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed ITS for NMP2 are acceptable.

The NRC staff has also reviewed the plant-specific changes to the CTS as described in this SE. On the basis of the evaluations described herein for each of the changes, the NRC staff also concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security, or to the health and safety of the public.

Attachments:
1. List of Acronyms
2. Table A of Administrative Changes to Current Technical Specifications
3. Table M of More Restrictive Changes to Current Technical Specifications
4. Table L of Less Restrictive Change to Current Technical Specifications
5. Table R of Relocated Specifications and Removed Details from Current Technical Specifications

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Date:

List of Acronyms

SEE 2 PAGE INSERT

AOT	Allowed outage time
APRM/APRMs	Average power range monitor(s)
ASME	American Society of Mechanical Engineers
CRD	Control rod drive
CTS/CTSs	Current technical specification(s)
DBA	Design-basis accident
DOC/DOCs	Discussion(s) of change (from the CTS)
~~DEGo~~	~~Detroit Edison Company~~
ECCS	Emergency core cooling system
EFCV/EFCVs	Excess flow check valve(s)
IRM/IRMs	Intermediate range monitor(s)
ISI	Inservice inspection
ITS/ITSs	Improved (converted) technical specification(s)
LCO/LCOs	Limiting condition(s) for operation
~~LLS~~	~~Low-low set~~
LPRM	Local power range monitor
MSIV/MSIVs	Main steam isolation valve(s)
PAM	Post-accident monitoring
QA	Quality assurance
RAI/RAIs	Request(s) for additional information
RCS	Reactor coolant system
RG	Regulatory guide
SDV	Scram discharge volume
SE	Safety evaluation
SLC	Standby liquid control
SR/SRs	Surveillance requirement(s)
SRM/SRMs	Source range monitor(s)
SRV/SRVs	Safety/relief valve(s)
STS/STSs	Improved standard technical specification(s), NUREG-1433/4, Rev. 1
TRM	Technical Requirements Manual
TS/TS	Technical specification(s)
TSTF	Technical Specifications Task Force (generic changes to the STS)
USAR	Updated ~~Final~~ Safety Analysis Report

ATTACHMENT 1

AC	air conditioning or alternating current
ADS	Automatic Depressurization System
APLHGR	average planar linear heat generation rate
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient without Scram
ATWS-RPT	Anticipated Transient without Scram - Recirculation Pump Trip
BPWS	banked position withdrawal sequence
BWR	Boiling Water Reactor
BWROG	Boiling Water Reactor Owners Group
CFR	Code of Federal Regulations
CFT	channel functional test
COLR	core operating limits report
CRDA	control rod drop accident
CREF	control room envelope filtration
CST	condensate storage tank
DC	direct current
DG	diesel generator
ECCS	Emergency Core Cooling System
EDG	emergency diesel generator
EFCVs	excess flow check valve(s)
EOC-RPT	end of cycle - recirculation pump trip
EPAs	electrical protection assembly(s)
ESF	Engineered Safeguard Feature
FR	Federal Register
FRTP	fraction of rated thermal power
GDCs	General Design Criteria(s)
GE	General Electric
HEPA	high efficiency particulate air
HPCS	High Pressure Core Spray
Hz	hertz
Kv	kilovolt
kW	kilowatt
LHGR	linear heat generation rate
LOCA	loss of coolant accident
LOOP	loss of offsite power
LOP	loss of power
LPCI	low pressure coolant injection
LPCS	low pressure core spray
LSFT	logic system functional test
MCPR	minimum critical power ratio
MFLPD	maximum fraction of limiting power density
MG	motor generator
MWD/T	megawatt days/short ton
NMP2	Nine Mile Point Unit 2
NUMAC	nuclear measurement analysis and control
OPDRVs	operation(s) with a potential for draining the reactor vessel
P/T	pressure/temperature
RBM	rod block monitor
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RG	regulatory guide

INSERT FOR LIST OF ACRONYMS

Page 1 of 2

NRC TO INTEGRATE INSERT IN ALPHABETICAL ORDER INTO STAFF "LIST OF ACRONYMS"

RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	reactor pressure vessel
RSCS	Rod Sequence Control System
RTP	rated thermal power
RWCU	reactor water cleanup
RWM	rod worth minimizer
SCIVs	secondary containment isolation valve(s)
SDC	shutdown cooling
SDM	shutdown margin
SER	Safety Evaluation Report
SGT	standby gas treatment
SSER	Supplemental Safety Evaluation Report
SW	service water
UHS	ultimate heat sink
UPS	uninterruptible power supply
V	volt
VAC	volts alternating current

INSERT FOR LIST OF ACRONYMS PAGE 2 of 2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.3, Control Rod OPERABILITY		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.3	3/4.1.3.1, 4.1.1.c, 3/4.1.3.2, 3/4.1.3.6, 3/4.1.3.7
A.2	Reorganized the Control Rod OPERABILITY Specification to include all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion.	3.1.3	3.1.3.1
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod," consistent with ~~current practice and interpretation.~~	3.1.3 ACTIONS Note	~~N/A~~ 3.1.3.1 ACTIONS
A.4	Adds a Note that allows for bypassing the RWM, if needed for continued operations. This note is informative in that the RWM may be bypassed at any time, provided the proper ACTIONS of CTS 3.1.4.1 (ITS 3.3.2.1), the RWM Specification, are taken.	3.1.03 Required Actions A.1 and C.1 Note	N/A
A.5	Replaces "Immovable, as a result of excessive friction or mechanical interference, or known to be untrippable" with the term "stuck," since details of potential mechanisms by which control rods may be stuck are not necessary for inclusion within the Condition.	3.1.3 Condition A	3.1.3.1 Action a, 4.1.1.c

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	Numerous footnotes, which permit the directional control valves to be rearmed intermittently, have been deleted since ITS LCO 3.0.5 provides this allowance.	~~N/A~~ LCO 3.0.5	3.1.3.1 Action a.1.b) footnote *, 3.1.3.1 Actions b.1.b) and b.2 footnote **, 3.1.3.6 Action a.2 footnote **, 3.1.3.6 Action b.2 footnote *, 3.1.3.7 Action a.3.b) footnote **
A.7	Various Actions, which state that the provisions of LCO 3.0.4 are not applicable, have been deleted since ITS LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.1.3.1 Action b.3, 3.1.3.2 Action b, 3.1.3.6 Action c, 3.1.3.7 Action c
A.8	Moves the SDV vent and drain valves requirements to ITS 3.1.8.	3.1.8	3.1.3.1 Actions d and e, 4.1.3.1.1, 4.1.3.1.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.9	References to RSCS have been deleted and are replaced with references to RWM, where applicable, since an NRC SER has approved operation with only one rod pattern control system OPERABLE, the RWM.	SR 3.1.3.2, SR 3.1.3.3, 3.1.3 Required Action C.1 Note	4.1.3.1.2, 3.1.3.6 Actions a.1 and a.2, 3.1.3.7 Actions a.3.a) and a.3.b)
A.10	Deletes redundant phrase exempting SR on inoperable control rods since inoperable control rods are already not required to meet this Surveillance (per CTS 4.0.3).	~~N/A~~ SR 3.0.1	4.1.3.1.2
A.11	Surveillance that "cross-references" other Surveillances is deleted since the listed Surveillances are required by other Specifications.	N/A	4.1.3.1.3
A.12	Moves the SDM allowance to the definition of SDM.	1.1 SHUTDOWN MARGIN definition	4.1.1.c
A.13	Presents the requirement that maximum control rod scram insertion time be $\leq$ 7 seconds in SR 3.1.3.4, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.4	LCO 3.1.3.2
A.14	Deletes the definition of time zero since it is duplicative of the definition of time zero in other CTS and maintained in footnote (a) to ITS Table 3.1.4-1.	Table 3.1.4-1 footnote (a)	LCO 3.1.3.2
A.15	Adds new SR to require the SRs in ITS 3.1.4 to be performed, since CTS 4.1.3.2, which provides the scram time testing requirements, is addressed in ITS 3.1.4.	SR 3.1.3.4	4.1.3.2
A.16	Presents the requirement that control rods be coupled to their drive mechanism in SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.5	LCO 3.1.3.6

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

SINCE THIS ACTION IS ALWAYS AN OPTION AND IS IMPLIED IN ALL ACTIONS.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.17	Deletes CTS 3.1.3.6 Action a.1, which specifies the method of restoring coupling integrity to an uncoupled control rod. ITS does not explicitly detail options or methods to "restore...to OPERABLE."	~~N/A~~ LCO 3.0.2	3.1.3.6 Action a.1
A.18	CTS 4.1.3.6.a, "CORE ALTERATIONS that could have affected the control rod drive coupling integrity," is a subset of CTS 4.1.3.6.c, which is incorporated in ITS SR 3.1.3.5(Performance of the integrity verification prior to control rod OPERABILITY).	N/A	4.1.3.6.a
A.19	The separate Specification for control rod position is captured by the requirement that each control rod have at least one control rod position indication in SR 3.1.3.1.	SR 3.1.3.1	LCO 3.1.3.7
A.20	Moves the requirements for control rod position indication during Mode 5 to ITS 3.9.4.	3.9.4	3/4.1.3.7
A.21	Covers the requirements of CTS 3.1.3.7 Action a.3.a).2) by the Note to ITS 3.1.3 Required Action C.1, which states, in part, that RWM may be bypassed as allowed by proposed LCO 3.3.2.1. LCO 3.3.2.1 provides the requirements of CTS 3.1.3.7 Action a.3.a).2).	3.1.3 Required Action C.1 Note	3.1.3.7 Action a.3.a).2)
3.1.4, Control Rod Scram Times			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.4	4.1.3.2, 3/4.1.3.3, 3/4.1.3.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes CTS 3.1.3.4 Action b, which states that the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.1.3.4 Action b
	3.1.5, Control Rod Scram Accumulators		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.5	3/4.1.3.5
A.2	Moves the control rod scram accumulator OPERABILITY MODE 5 requirements to ITS 3.9.5. WHICH IS	3.9.5	3/4.1.3.5
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," consistent with ~~current practice and interpretation.~~ THE INTENT OF THE CTS.	3.1.5 ACTIONS Note	~~N/A~~ 3.1.3.5 ACTIONS
A.4	Deletes the "default" action "Otherwise, place the reactor mode switch in the shutdown position," as there are no circumstances that preclude the possibility of compliance with an ACTION to "Declare the control rod...inoperable."	N/A	3.1.3.5 Action a.1.a)
A.5	The method for verifying that a control rod drive pump is operating has been changed from inserting one control rod one notch to verifying that charging water header pressure is at least 940 psig. The proposed method for determining charging water header pressure provides added assurance that the charging water pressure is sufficient to insert all control rods, whereas the existing method only assures that one rod can be inserted.	3.1.5 ACTIONS B and C	3.1.3.5 Actions a.1.b) and a.2.a)
A.6	Deletes CTS 3.1.3.5 Action c, which states that the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.1.3.5 Action c
A.7	Deletes the conditions which specify when the accumulator Surveillance does not have to be performed (i.e., when the associated control rod is inserted and disarmed or scrammed), since ITS LCO 3.0.1 provides the allowance.	N/A	4.1.3.5.a

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.6, Rod Pattern Control		
None	None	None	None
	3.1.7, Standby Liquid Control System		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.1.5
A.2	Clarifies, for the requirement that the temperature of the SLC pump suction piping be > 70°F, that the temperature of the suction piping is only "up to the pump suction valve."	SR 3.1.7.3	4.1.5.a.3
A.3	Adds "or can be aligned to the correct position" in SR 3.1.7.6 to clarify that it is permissible for the SLC systems' valves to be in the non-accident position and still be considered OPERABLE.	SR 3.1.7.6	4.1.5.b.3
A.4	Rewords the SR that verifies the heat traced piping is unblocked to identify the extent of the system heat traced piping.	SR 3.1.7.9	4.1.5.d.3
A.5	Changes the Frequency of verification that the heat traced piping is unblocked such that the Surveillance is required if the ~~solution~~ PIPING temperature drops below the lower limit (70°F) rather than whenever both heat tracing circuits have been found to be inoperable.	SR 3.1.7.9	4.1.5.d.3 footnote *
A.6	Deletes the allowance in CTS 4.1.5.d.3 footnote * to perform the test by any series of sequential, overlapping or total flow path steps such that the entire flow path is included, since the test can only be performed in one step; by pumping from the storage tank to the test tank.	N/A	4.1.5.d.3 footnote *
	3.1.8, SDV Vent and Drain Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.8	3/4.1.3.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3 3.1.1	3/4.3.1, 2.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel" and revises the wording for CTS 3.3.1.1 Action A ("One or more required channels"). ~~Provides equivalent requirements in the ITS format.~~ WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.3.1.1 ACTIONS Note, 3.3.1.1 ACTION A	3.3.1 Actions
A.3	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.3.1 Action a
A.4	The response time for some of the RPS Functions are not assumed in any accident analysis, thus their response time is listed as "N/A" (i.e., not applicable) in the USAR Table 7.2-3. Therefore, the response time tests for these functions have been deleted by not including TS response time SRs to Functions that have N/A notes in the USAR. In addition, for ITS Table 3.3.1.1-1 Function 9, Turbine Control Valve Fast Closure, Trip Oil Pressure — Low, the response time is measured from the start of turbine control valve fast closure, not when the oil pressure sensor exceeds its Set point. This is annotated in USAR Table 7.2-3. This allowance was in the RPS Response Time Table in CTS prior to the removal of the Table from the CTS and relocation to the USAR. Therefore, Note 4 has been added to proposed SR 3.3.1.1.16 to provide this allowance.	SR 3.3.1.1.16 Note 4	4.3.1.3

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	Clarifies the Applicability of ITS 3.3.1.1 Functions 7.a and 7.b, which requires the Functions to be OPERABLE in MODE 5 only with any control rod withdrawn from a core cell containing one or more fuel assemblies, by removing the cross references to the Special Operations LCOs.	3.3.1.1 Functions 7.a and 7.b	Table 3.3.1-1 Note (h) and Table 4.3.1.1-1 Note (m)
A.8	Enhances presentation by requiring actions to be immediately initiated to insert control rods consistent with current TS intent in lieu of current requirement to insert the control rods in 1 hour.	3.3.1.1 Required Action H.1	Table 3.3.1-1 Actions 3 and 9
A.9	Removes the CHANNEL FUNCTIONAL TEST Surveillance Frequency of "S/U" and Note (c) of CTS Table 4.3.1.1-1 for Function 1.a "within 24 hours before startup, if not performed within the previous 7 days." These notations are redundant to the requirements of ITS SR 3.0.4, which requires the periodic weekly surveillance to be performed and to be met prior to entry into the applicable operational conditions.	~~N/A~~ SR 3.0.4	Table 4.3.1.1-1 Function 1.a Frequency and Note (c)
A.10	CTS Table 4.3.1.1-1 Note (d), which requires an additional CHANNEL FUNCTIONAL TEST of the IRM Neutron Flux—High MODE 2 Function on an 18 month Frequency with the mode switch in Startup/Hot Standby is deleted because it duplicates the current weekly test requirement and the LOGIC SYSTEM FUNCTIONAL TEST requirement which ensure that the reactor mode switch contacts for the IRMs are operable.	N/A	Table 4.3.1.1-1 Note (d)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Adds a Note ~~has been added~~ to the Surveillance Requirements to provide direction for proper application of the Surveillance Requirements for Technical Specification compliance.	3.3.1.2 Surveillance Requirements Note	N/A
A.4	Adds the required signal-to-noise ratio associated with the source range monitors limit of 3 cps to CTS 4.3.7.6.c and CTS 4.9.2.c (proposed SR 3.3.1.2.4). This value has been approved by the NRC in the Safety Evaluation of Amendment 21 to the NMP2 Operating License.	SR 3.3.1.2.4	4.3.7.6.c, 4.9.2.c
A.5	CTS actions are clarified in the ITS by the addition of the phrase, "except for control rod insertion", because the ITS definition of a CORE ALTERATION includes control rod insertion and therefore differs from the CTS definition.	3.3.1.2 ACTION E	3.9.2 Action
A.6	CTS 4.9.2.c includes two options to meeting the SRM count rate requirement during a complete core spiral reload: the count rate must be met until the time when four fuel assemblies are loaded around the SRM or until the time a portable external source is placed near the SRM. SR 3.3.1.2.4 Note does not require the SRM count rate to be met when a portable source is installed and no fuel assemblies are around the SRM. ~~NMP2 does not use the portable monitor option.~~ THIS IS ACCEPTABLE SINCE THE FIRST OPTION IS	N/A	4.9.2.c
	THE LATEST TIME IN WHICH SRM COUNT RATE MUST BE MET.		
3.3.2.1, Control Rod Block Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	3/4.3.6, 3/4.1.4.1, 3/4.1.4.3

IS NOT USED IN THE ITS.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	The reference to "OPERATIONAL CONDITION 1" ~~is not used~~ from the CTS Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER," in both the CTS and ITS with THERMAL POWER ≥ 30% RTP, the unit will always be in MODE 1 (Operational Condition 1). In addition, CTS Tables 3.3.6-1 and 4.3.6-1 footnote * and LCO 3.1.4.3 (ITS Table 3.3.2.1-1 Note (a)) have been modified to not require the RBM to be Operable when a peripheral control rod is selected, since this note explains the RBM design feature which includes an automatic bypass when a peripheral rod is selected.	Table 3.3.2.1-1, Functions 1.a, 1.b, 1.c, and Note (a)	Tables 3.3.6-1 and 4.3.6-1 Trip Functions 1.a, 1.b, and 1.c., including footnote *, LCO 3.1.4.3
A.3	Deletes the allowance in CTS 3.1.4.1 Action b, which states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.1.4.1 Action b
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.3.9
A.2	The Feedwater System/Main Turbine Trip Instrumentation requirements of CTS 3.3.9, Plant Systems Actuation Instrumentation, have been placed in ITS 3.3.2.2.	3.3.2.2	3/4.3.9
A.3	The CTS 3.3.9 Applicability, which states that the Applicability is as shown in CTS Table 3.3.9-1, has been changed to specifically state the Applicability, instead of referencing a Table, since a Table format has not been used in the proposed Specification.	3.3.2.2 Applicability	3.3.9 Applicability, Table 3.3.9-1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Adds ITS ACTIONS Note "Separate Condition Entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.2.2 ACTIONS Note	3.3.9 Actions
A.5	Since no separate system functional test is specified, the operation of the feedwater pump breakers and main turbine stop valves is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of proposed SR 3.3.2.2.4. Therefore, the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.2.2.4	4.3.9.2
	WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.		
	3.3.3.1, Post Accident Monitoring Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.1	3/4.3.7.5
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each function". ~~Provides equivalent requirements in the ITS format.~~	3.3.3.1 ACTIONS Note	3.3.7.5 Action a
A.3	Moves the details concerning the technical content of the Special Report specified in CTS 3.3.7.5 Actions 80a, 81a, and 81b to Chapter 5 of the ITS.	5.6	3.3.7.5 Actions 80a, 81a, and 81b
A.4	Adds an ACTION that directs entry into appropriate Conditions referenced in ITS Table 3.3.3.1-1 when two or more channels in the same Function are inoperable and the Completion Time for restoration of all but one required channel has expired. Provides a necessary step for the ITS table format to be used without changing requirements.	3.3.3.1 ACTION D	Table 3.3.7.5-1 ACTIONS

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Deletes the details related to how to perform the CHANNEL CALIBRATION of thermocouples since this description is already included in the ITS definition of CHANNEL CALIBRATION.	N/A	Table 4.3.7.5-1 footnote *
	3.3.3.2, Remote Shutdown System		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.2	3/4.3.7.4
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function". ~~Provides equivalent requirements in the ITS format.~~ WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.3.3.2 ACTIONS Note	3.3.7.4 Actions a and b
A.3	The specific Channel Checks on the RCIC Turbine Speed and RCIC Flow Indicators have been deleted since ~~these channels are normally deenergized and~~ the 18-month Channel Check Surveillance Frequency is performed as part of the 18-month Channel Calibration surveillance test.	N/A	4.3.7.4.1 for Table 4.3.7.4-1, Instruments 5 and 13
A.4	Deletes CTS Table 4.3.7.4-1 footnote * that should have been deleted when Amendment 69 was issued on September 11, 1995, since it is referencing a Specification that does not apply.	N/A	Table 4.3.7.4-1 footnote *
A.5	Deletes the details related to how to perform the CHANNEL CALIBRATION of the Instrument 9 RTDs since this description is already included in the ITS definition of CHANNEL CALIBRATION.	N/A	Table 4.3.7.4-1 footnote **

IDENTICAL TO THE CHANNEL CALIBRATION FREQUENCY, AND IS

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.4.1, EOC-RPT Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.3.4.2, 3.2.3 Actions a and c
A.2	Adds an LCO option to permit a MCPR penalty to be applied in lieu of maintaining the EOC-RPT Instrumentation Operable, consistent with the current licensing basis as indicated in CTS 3.3.4.2 Actions d and e, and CTS 3.2.3 Action a.	LCO 3.3.4.1.b	3.3.4.2 Actions d and e, 3.2.3 Action a
A.3	The reference to "OPERATIONAL CONDITION 1" ~~is not used~~ from the CTS Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER," In both the CTS and ITS with THERMAL POWER ≥ 30% RTP, the unit will always be in MODE1(Operational Condition 1).	3.3.4.1 Applicability IS NOT USED IN THE ITS.	3.3.4.2 Applicability
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.4.1 ACTIONS Note	3.3.4.2 Actions
A.5	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.2.3 Action a
A.6	Since no separate system functional test is specified, the opening of the recirculation pump trip breakers is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of proposed SR 3.3.4.1.3. Therefore the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.4.1.3	4.3.4.2.2
	, WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.		

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SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.4.2, ATWS-RPT Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.2	3/4.3.4.1
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.4.2 ACTIONS Note	3.3.4.1 Actions
A.3	Provide an option to restore the channel to Operable status in lieu of tripping the channel. This option is consistent with CTS allowances.	3.3.4.2 Required Action A.1	3.3.4.1 Action b
A.4	Since no separate system functional test is specified, the opening of the recirculation pump trip breakers is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of proposed SR 3.3.4.2 6. Therefore the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.4.2 6	4.3.4.1.2
	3.3.5.1, ECCS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.3.3, 3/4.3.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.5.1 ACTIONS Note	3.3.2 Actions, 3.3.3 Actions
A.3	If an ADS trip system is not restored within the specified time, ITS 3.3.5.1 ACTION H requires the ADS valves to be declared inoperable and the ACTION provided in the ADS Specification (ITS 3.5.1) to be taken in lieu of repeating the shutdown ACTIONS in the instrumentation Specification.	ITS 3.3.5.1 ACTION H	3.3.3 Action c
A.4	Moves the technical content concerning ECCS response time testing to ITS 3.5.1, ECCS – Operating and ITS 3.5.2, ECCS – Shutdown.	3.5.1, 3.5.2	4.3.3.3

, WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Each of the current ECCS Instrumentation Manual Initiation switch and push button channels actually provides two inputs to the initiation logic; one input actuated by rotating a collar switch, and a second input by depressing the inner pushbutton. Therefore, using the ITS format that each input is considered a channel, the minimum channels is more appropriately specified as "2" for CTS Table 3.3.3-1 Trip Functions A.1.k, B.1.i, and C.1.h (ITS Table 3.3.5.1-1 Functions 1.m, 2.k, and 3.i), and "4" for CTS Table 3.3.3-1 Trip Functions A.2.g and B.2.f (ITS Table 3.3.5.1-1 Functions 4.f and 5.g).	Table 3.3.5.1-1 Functions 1.m, 2.k, 3.i, 4.f, and 5.g	Table 3.3.3-1 Trip Functions A.1.k, A.2.g, B.1.i, B.2.f, and C.1.h
A.6	Moves the technical content of the loss of power instrumentation requirements of CTS Tables 3.3.3-1, 3.3.3-2, and 4.3.3.1-1, Trip Functions D and E, including CTS Table 3.3.3-1 Actions 38 and 39, CTS Table 3.3.3-2 footnote **, and CTS Table 4.3.3.1-1 footnote †, to ITS 3.3.8.1.	3.3.8.1	Tables 3.3.3-1, 3.3.3-2, and 4.3.3.1-1, Trip Functions D and E, including CTS Table 3.3.3-1 Actions 38 and 39, CTS Table 3.3.3-2 footnote **, and CTS Table 4.3.3.1-1 footnote †
A.7	CTS Table 3.3.3-1 Actions require declaring the associated system or ADS Trip System inoperable when the time to restore the channel has expired. CTS 3.3.3 Action c provides 72 hours or 7 days to restore the ADS Trip System, depending upon whether or not both RCIC and HPCS systems are operable. When the restoration time expires, a shutdown is required. In ITS, the requirement to declare the associated system inoperable is replaced with the total time to restore the channel. Thus, three CTS Actions are combined into two ITS Actions.	3.3.5.1 ACTIONS F and G	Table 3.3.3-1 Actions 30 and 32, 3.3.3 Action c
A.8	Deletes the allowance in the CTS 3.3.2 which states the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 contains this allowance.	~~N/A~~ LCO 3.0.4	3.3.2 Action, Table 3.3.3-1 Actions 30.g, 36.a, and 37 footnote *

TABLE A - ADMINISTRATIVE CHANGES MATRIX
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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.10	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.3.3.1-1 Manual Initiation Functions with an LSFT in ITS 3.3.5(1, which is a complete test of the logic, including the Manual initiation switches, and is performed at the same Frequency.	N/A	Table 4.3.3.1-1 CHANNEL FUNCTIONAL TEST of Trip Functions A.1.k, A.2.g, B.1.i, B.2.f, C.1.h, and Footnote (a)
A.11	Moves functions required to provide a signal to the Group 4 valves (i.e., CTS Table 3.3.2-1 Trip Function 1.a.3, Reactor Vessel Water Level—Low, Level 3, Trip Function 1.b, Drywell Pressure—High, and Trip Function 1.m, Manual Isolation Pushbutton) from the current Primary Containment Isolation Instrumentation Specification, CTS 3/4.3.2, to the proposed ECCS Instrumentation Specification, ITS 3.3.5.1. The Group 4 valves are not PCIVs, but are valves that need to go closed to ensure the LPCI A and B flow is not diverted from injecting into the core.	3.3.5.1	Table 3.3.2-1 Trip Functions 1.a.3, 1.b, and 1.m
	3.3.5.2, RCIC System Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.3.5
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.5.2 ACTIONS Note 1	3.3.5 Actions
A.3	Changes the column title to be on a per Function basis in ITS Table 3.3.5.2-1 rather than the per Trip System basis in CTS Table 3.3.5-1. Thus, the number of required channels for CTS Table 3.3.5-1 Functional Units 1 (Reactor Vessel Water Level—Low Low, Level 2) and 2 (Reactor Vessel Water Level—High, Level 8) are changed to "4", since there are two trip systems for each of these Functional Units, with two channels per trip system.	Table 3.3.5-1	Table 3.3.5.2-1

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	The Manual Initiation switch and pushbutton channel provides two inputs to the initiation logic; one input activated by rotating a collar switch and a second input by depressing the inner pushbutton. Therefore, using the ITS format that each input is considered a channel, the minimum channels is more appropriately specified as "2."	Table 3.3.5.2-1 Function 5	Table 3.3.5-1 Functional Unit 4
A.6	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.3.5.1-1 Functional Unit 4 (the Manual Initiation Function) with an LSFT in ITS 3.3.5.2, which is a complete test of the logic, including the Manual Initiation switches, and is performed at the same frequency.	SR 3.3.5.2.5	Table 4.3.5.1-1 CHANNEL FUNCTIONAL TEST of Functional Unit 4 and Footnote †
A.7	CTS require the inoperable channel and/or the associated Trip System to be placed in trip when a channel is inoperable. ITS do not include the allowance to place the trip system in trip since there is no manual pushbutton or switch to place only the associated trip system in trip.	N/A	Table 3.3.5-1 Action 50.a
	3.3.6.1, Primary Containment Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	3/4.3.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.6.1 ACTIONS Note	3.3.2 Actions
A.3	Deletes the CTS allowance that states that the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.3.2 Actions
A.4	Response time testing for Primary Containment Isolation Instrumentation Functions, except CTS Table 3.3.2-1 Functions 1.a.3), 1.c.2), and 1.c.3, are deleted since these times directly correspond to the diesel generator start time delay test specified in ITS 3.8.1.	N/A	4.3.2.3

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Deletes the statement concerning the details on the frequency of performing the Isolation System Response Time test, since it is covered by the definition of STAGGERED TEST BASIS.	N/A	4.3.2.3
A.6	The list of individual CTS primary containment isolation instrumentation Functions are divided into five sections in ITS Table 3.3.6.1-1; Main Steam Line Isolation, Primary Containment Isolation, RCIC System Isolation, RWCU System Isolation, and RHR SDC System Isolation. ~~isolation.~~	Table 3.3.6.1-1 Functions 1, 2, 3, 4, and 5	Tables 3.3.2-1, 3.3.2-2, and 4.3.2.1-1
A.7	The requirements identified in CTS Tables 3.3.2-1, 3.3.2-2, and 4.3.2.1-1 related to Secondary Containment Isolation (as described in Notes (c), (d), and * to Table 3.3.2-1 and Footnote * to Table 4.3.2.1-1) have been moved to ITS 3.3.6.2.	3.3.6.2	Table 3.3.2-1, including Notes (c), (d), and *, Table 3.3.2-2, and Table 4.3.2.1-1, including Footnote *,
	The requirement identified in CTS Table 3.3.2-1 Note (e) concerning the trip and isolation of the air removal pumps on a Main Steam Line Radiation—High signal has been moved to ITS 3.3.7.2.	3.3.7.2	Table 3.3.2-1 Note (e),
	CTS Table 3.3.2-1 specifies that Trip Function 1.a.3), Reactor Vessel Water Level — Low, Level 3, Trip Function 1.b, Drywell Pressure— High, and Trip Function 1.m, Manual Isolation Pushbutton, are required to provide a signal to the Group 4 valves; however, the Group 4 valves are not primary containment isolation valves (PCIVs). Therefore, since the valves are not required to be Operable as part of the PCIV Technical Specification (since they are not PCIVs), the primary containment isolation instrumentation requirement that the three above listed Trip Functions actuate the Group 4 valves has not been included in ITS 3.3.6.1. However, since these valves are required for LPCI OPERABILITY, the instruments will be moved to ITS 3.3.5.1.	3.3.5.1	Table 3.3.2-1 Trip Functions 1.a.3), 1.b, and 1.m

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Each of the Isolation Instrumentation Manual Initiation switch and push button channels provides two inputs to the isolation logic; one input actuated by rotating a collar switch and a second input by depressing the inner push button. In the ITS format each input is considered a channel, thus the minimum channels for ITS is correctly specified as "4."	Table 3.3.6.1-1 Functions 1.h, 2.d, 4.h, and 5.f	Table 3.3.2-1 Trip Function 1.m
A.9	Not used.		
A.10	The CTS action to "declare the affected system inoperable," is deleted since this instruction is essentially a "cross reference" between Technical Specifications.	N/A	Table 3.3.2-1 Actions 22, 26, and 28
A.11	Bases Figure 3/4.3-1 provides information as to what reactor vessel water level the various reactor water instruments actuate, in comparison to one another. This instructional information is a pictorial reference which duplicates the Allowable Value column of the ITS Table.	N/A	Table 3.3.2-2 Footnote *
A.12	CTS Table 3.3.2-2 Footnote *** requires that prior to the Allowable Value adjustment, the ambient temperature reading for all operable channels in the lead enclosure area must be greater than or equal to the ambient temperature used as the basis for the Allowable Value (part a of the footnote), and a Surveillance is implemented in accordance with Note d of Table 4.3.2.1-1 (part c of the footnote). These two requirements have been deleted since they are duplicative of the requirement to perform the Surveillance.	N/A	Table 3.3.2-2 Footnote ***, parts a and c
A.13	Instructions related to how to perform thermocouple CHANNEL CALIBRATIONS are deleted since they duplicate the ITS definition of CHANNEL CALIBRATION.	N/A	Table 4.3.2.1-1 Note (b)
A.14	The refueling interval CHANNEL FUNCTIONAL TEST requirement for CTS SLCS Initiation is deleted since it is redundant to the ITS refueling interval LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.6.1.6	Table 4.3.2.1-1 Trip Function 1.i.3)

MODIFIES AN ALLOWABLE VALUE, AND

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.16 (cont)	c) The RWCU Pump Rooms A and B Temperature - High Functions, require 2 total channels per trip system. There are two pump rooms monitored, A and B, for these Functions, with one channel per room in each trip system. Therefore, since the two Trip Functions monitor the same System, these two Trip Functions have been combined into one Function in ITS Table 3.3.6.1-1: Function 4.d. The required channels per trip system is listed as 1 per room. d) The Reactor Building Pipe Chase Area Temperature - High Functions, require 4 total channels per trip system. There are three azimuthal areas monitored, 180° upper, 40°, and 180° lower, for these Functions, with one channel per area in each trip system for the first two areas and two channels in each trip system for the third area. Therefore, since the three Trip Functions monitor the same parameter, these three Trip Functions have been combined into one Function for each of the three affected Systems (i.e., RCIC, RWCU, and RHR SDC Parameter) in ITS Table 3.3.6.1-1: Functions 3.h, 4.e, and 5.d, respectively. The required channels per trip system is listed as 1 per area. In addition, for clarity, the channels are described in ITS Table 3.3.6.1-1 based on the elevation in lieu of the azimuth. DELETE LINE		
	e) The Reactor Building General Area Temperature - High Function, requires 5 total channels per trip system. There are five areas monitored for this Function, with one channel per area in each trip system. Therefore, in ITS Table 3.3.6.1-1 Functions 3.i and 5.e, the required channels per trip system is listed as 1 per area.		

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.6.2, Secondary Containment Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.2	3/4.3.2, 4.6.5.3.d
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.6.2 ACTIONS Note	3.3.2 Actions
A.3	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.3.2 Actions
A.4	Deletes CTS 4.3.2.3, which requires the ISOLATION SYSTEM RESPONSE TIME of each Function to be demonstrated, since the response times for the secondary containment isolation instrumentation Functions directly correspond with the diesel generator start time delay test specified in ITS 3.8.1.	N/A	4.3.2.3
A.5	In the ITS, the Secondary Containment Isolation Instrumentation is in a separate LCO from the Primary Containment Isolation Instrumentation. Therefore, the part of CTS Table 3.3.2-1 Note *, which states that the Applicability listed in this Note applies only to the Functions described in CTS Table 3.3.2-1 Notes (c) and (d) (i.e., the SCIVs and SGT System) is unnecessary in the ITS format and has been deleted.	N/A	Table 3.3.2-1 Note *
A.6	The CTS ~~defined~~ term REACTOR BUILDING INTEGRITY is not used in the ITS format. The elements of the CTS requirements included in the defined term, which are to isolate SCIVs and start the associated SGT subsystem(s), are retained.	3.3.6.2 Required Actions C.1.1 and C.2.1	Table 3.3.2-1 Action 27
A.7	Deletes reference to Bases Figure 3/4.3-1. This Figure is providing information as to what reactor vessel water level the various reactor water instruments actuate, in comparison to one another. This instructional information is a pictorial reference which duplicates the Allowable Value column of the ITS Table.	N/A	Table 3.3.2-2 Footnote *

(THE UNDEFINED TERM "REACTOR BUILDING INTEGRITY" IS SYNONYMOUS WITH THE DEFINED TERM "SECONDARY CONTAINMENT INTEGRITY.")

(PUT A.4 FROM 'M' TABLE (3.3.7.1) BACK HERE)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Divides the technical content of CTS 4.6.5.3.d.2, the system functional test of the SGT System, into two surveillance requirements.	SR 3.3.6.2.5, 3.6.4.3 Surveillance Requirements	4.6.5.3.d.2
	3.3.7.1, CREF System Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.7.1	3/4.3.7.1, 3/4.7.3
A.2	CTS 3/4.3.7.1 specifies requirements on radiation monitoring instrumentation. 10 CFR 50.36 requires that ITS 3.3.7.1 only retain the Control Room Envelope Filtration (CREF) System Functions of the radiation monitoring instrumentation. Therefore, the LCO statement, Actions, Surveillance Requirement, and Tables have been modified to require these Functions. In addition, the alarm/trip Set point column in CTS Table 3.3.7.1-1 has been changed to Allowable Value Column in ITS Table 3.3.7.1-1.	3.3.7.1	3/4.3.7.1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.7.1 ACTIONS Note	3.3.7.1 Actions
A.5	Divides the technical content of CTS 4.7.3.e.2, the system functional test of the CREF System, into two surveillance requirements.	SR 3.3.7.1.5, 3.7.2 Surveillance Requirements	4.7.3.e.2
	3.3.7.2, Mechanical Vacuum Pump Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.7.2	3/4.3.2
A.2	The Mechanical Vacuum Pump Isolation Instrumentation portion of the Main Steam Line Radiation – High Function requirements of CTS 3.3.2, Isolation Actuation Instrumentation, have been placed in ITS 3.3.7.2.	3.3.7.2	3/4.3.2
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.7.2 ACTIONS Note	3.3.2 Actions

, WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	3.3.2 Actions
A.5	Since no separate system functional test is specified, the opening of the mechanical vacuum pump breakers and the closing of the associated isolation valve are specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of proposed SR 3.3.7.2.4. Therefore, the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.7.2.4	4.3.2.2
A.6	CTS Table 3.3.2-1 contains a requirement for two channels per trip system (two trip systems) for the Main Steam Line Radiation—High Function. ITS LCO 3.3.7.2 presents the CTS requirement as requiring four total channels to be OPERABLE.	LCO 3.3.7.2	Table 3.3.2-1 Trip Function 1.c.1
A.7	CTS Table 3.3.2-2 Footnote ** allows the Allowable Value and Trip Set point of the Main Steam Line Radiation—High Function to be adjusted upward to account for a higher background level prior to the start of a hydrogen injection test. However, the allowance is only applicable if reactor power is ≥ 20% RTP, and the mechanical vacuum pumps are not allowed to be operated at this power level. Therefore, proposed SR 3.3.7.2.3, which provides the Allowable Value (the Trip Setpoint is deleted as described in DOC L.1 for ITS 3.3.7.2), will not include this allowance.	N/A LCO 3.4.1	Table 3.3.2-2 Footnote **
	3.3.8.1, Loss of Power Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3/4.3.3
A.2	A new LCO, ITS 3.3.8.1, has been written specifically for the Loss of Power (LOP) Instrumentation. The LOP Function from the current ECCS instrumentation Specification (CTS 3/4.3.3) is incorporated into this LCO. ITS 3.3.8.1 requires the instruments listed in ITS Table 3.3.8.1-1 to be OPERABLE, and the Table has the appropriate Functions from CTS Table 3.3.3-1 listed.	3.3.8.1	3/4.3.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION
WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel". ~~Provides equivalent requirements in the ITS format.~~	3.3.8.1 ACTIONS Note	3.3.3 Actions
A.4	Deletes the ECCS Response Time surveillance for this instrumentation since there is no requirement to measure Loss of Power instrumentation response times.	N/A	4.3.3.3
A.5	Deletes CTS Action 38 since it is not used for any Function in CTS Table 3.3.3-1.	N/A	Table 3.3.3-1 Action 38
A.6	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	~~N/A~~ LCO 3.0.4	Table 3.3.3-1 Action 39 footnote *
	3.3.8.2, RPS Electric Power Monitoring–Logic		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.8.4.4
A.2	Each RPS logic bus is protected by two EPAs connected in series. A UPS set or an alternate AC power source may supply each RPS logic bus via these EPAs. Since the RPS logic buses can only be supplied through the EPAs using the two sources, (both of which are allowed by this LCO), the reference to the power supplies in CTS 3.8.4.4 and Actions a and b is deleted, and replaced with RPS logic bus.	3.3.8.2	3.8.4.4 and Actions a and b
	3.3.8.3, RPS Electric Power Monitoring–Scram Solenoids		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.3	3/4.8.4.5

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Each RPS scram solenoid bus is protected by two EPAs connected in series. An MG set or an alternate source may supply each RPS scram solenoid bus via these EPAs. Since the RPS scram solenoid buses can only be supplied through the EPA using the two sources (both of which are allowed by this LCO), the reference to the specific power supplies in CTS 3.8.4.5 and Actions a and b is deleted, and replaced with RPS scram solenoid bus.	3.3.8.3	3.8.4.5 and Actions a and b
A.3	CTS 3.8.4.5 Actions a and b provide the option to restore the inoperable EPA to OPERABLE status or remove the associated RPS MG set or alternate power supply from service. ITS 3.3.8.3 ACTIONS do not explicitly detail options of "restore...to OPERABLE status," since this action is always an option, and is implied in all ACTIONS.	~~N/A~~ LCO 3.0.2	3.8.4.5 Actions a and b
Current Specification 3/4.3.7.1, Radiation Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.7.2, Seismic Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.7.7, Traversing In-Core Probe System			
A.1	Moves CTS 4.3.7.7.b and c, relating to testing the explosive squib charges for the TIP System shear valves, to ITS 3.6.1.3.	3.6.1.3	4.3.7.7.b, 4.3.7.7.c
Current Specification 3/4.3.7.8, Loose Part Detection System			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.1	3/4.4.1.1, 3/4.4.1.3
A.2	LCO statement rewritten into two options, with the first option requiring two recirculation loops and the second option requiring one recirculation loop with the added requirements of CTS 3.4.1.1 Actions a.1.c), a.1.d), and a.1.e). This eliminates the current exception to LCO 3.0.4, since with only one recirculation loop in operation, the LCO is being met.	LCO 3.4.1, 3.4.1 ACTION F	LCO 3.4.1.1, 3.4.1.1 Action a
A.3	Deletes duplicate requirement CTS 3.4.1.1.a, which requires the total core flow to be ≥ 45% of rated during two pump operation. It is encompassed by CTS 3.4.1.1.b which requires THERMAL POWER to be within the unrestricted zone of CTS Figure 3.4.1.1-1.	N/A	LCO 3.4.1.1.a
A.4	Deletes the reference to CTS 3.10.4 in CTS 3.4.1.1 Applicability footnote * and CTS 3.4.1.3 Applicability footnote ** since the governing requirement (3.10.4) has been deleted.	N/A	LCO 3.4.1.1 footnote *, LCO 3.4.1.3 footnote **
A.5	Changes the requirement to increase the MCPR safety limit per CTS 2.1.2 when only one recirculation loop is in operation, to be the MCPR operating limit requirement specified in the COLR. The Safety Limit requirement is specified as the single loop limit; thus, when the plant is in single loop, the limit applies regardless of this specification.	LCO 3.4.1.b	3.4.1.1 Action a.1.c), including footnote ***
A.6	Deletes requirement to reduce the APRM Rod Block Setpoints since the function has been deleted from the CTS in Amendment No. 51. In addition, deletes reference to APRM Scram and RBM Trip Setpoints since the trip setpoints are an operational detail.	N/A	3.4.1.1 Action a.1.e)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.4, Safety/Relief Valves (S/RVs)		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.4.2
	3.4.5, RCS Operational Leakage		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.4.3.2
A.2	Editorially changes "any 24-hour period" to "the previous 24-hour period."	LCO 3.4.5.c, LCO 3.4.5.d	LCO 3.4.3.2.c, LCO 3.4.3.2.e
A.3	Moves CTS 3.4.3.2.d, 3.4.3.2 Action c (including footnote *), 3.4.3.2 Action d, 3.4.3.2 Action e, 4.4.3.2.2, 4.4.3.2.3, and 4.4.3.2.4 to ITS 3.4.6.	3.4.6	LCO 3.4.3.2.d, 3.4.3.2 Action c including footnote *, 3.4.3.2 Actions d and e, 4.4.3.2.2, 4.4.3.2.3, 4.4.3.2.4
A.4	Adds ITS 3.4.5 Required Action B.1 to provide an option to reduce the leakage to within the limit in lieu of identifying the source, since restoring compliance with the LCO is always an option.	3.4.5 Required Action B.1	N/A
	3.4.6, RCS Pressure Isolation Valve (PIV) Leakage		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.4.3.2
A.2	Adds ITS Notes "Separate Condition entry is allowed for each flow path" and "Enter applicable Conditions and Required Actions for systems made inoperable by PIVs", WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.4.6 ACTIONS Notes 1 and 2	~~N/A~~ 3.4.3.2 ACTIONS

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.7, RCS Leakage Detection Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3/4.4.7	3/4.4.3.1
A.2	Deletes requirement for an alternate tank leak rate measurement method be applied for the drywell floor drain sump since it duplicates the requirement in CTS 3.4.3.2 (ITS 3.4.5).	N/A	3.4.3.1 Action c
A.3	Adds an Action to explicitly identify that LCO 3.0.3 is required to be entered if all required RCS leakage detection systems are inoperable.	3.4.7 ACTION D	3.4.3.1, 3.0.3
	3.4.8, RCS Specific Activity		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.8	3/4.4.5
A.2	Deletes CTS 3.4.5, Action c requiring increased sampling under certain conditions (as specified in CTS Table 4.4.5-1, Item 4.b) when the LCO 3.4.5.a limit is exceeded. CTS 3.4.5, Action b already requires the increased sampling every 4 hours when the LCO 3.4.5.a limit is exceeded, not just when the conditions of Action c are met.	N/A	3.4.5 Action c
	3.4.9, RHR Shutdown Cooling System - Hot Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.4.9.1
A.2	Moves allowance to remove the RHR shutdown cooling loop from operation during hydrostatic testing to ITS 3.10.1.	3.10.1	3.4.9.1 footnote †
A.3	Adds ITS Note "Separate Condition entry is allowed for each RHR shutdown cooling subsystem," WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.4.9 ACTIONS Note 2	~~N/A~~ 3.4.9.1 ACTIONS

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Deletes the requirement to demonstrate every 24 hours the operability of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling loop. It is unnecessary since the specification requires that the reactor be in MODE 4 within 24 hours (which exits this Specification), and CTS 3.4.9.2 and ITS 3.4.10 both require the periodic verification of the availability of an alternate decay heat removal method.	N/A	3.4.9.1 Action a
A.5	Deletes the CTS 3.4.9.1 footnote ††, which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain Mode 4.	N/A	3.4.9.1 footnote ††
A.6	Changes CTS 3.4.9.1 Action b and CTS 4.4.9.1 to agree with the LCO, which specifically allows a recirculation pump to be in operation as an acceptable method for assuring the necessary flow conditions, in lieu of operating an RHR shutdown cooling pump.	3.4.9 ACTION B, SR 3.4.9.1	3.4.9.1 Action b, 4.4.9.1
3.4.10, RHR Shutdown Cooling System - Cold Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.10	3/4.4.9.2
A.2	Moves allowance to remove the RHR shutdown cooling loop from operation during hydrostatic testing to ITS 3.10.1.	3.10.1	3.4.9.2 footnote †
A.3	Adds ITS Note "Separate Condition entry is allowed for each RHR shutdown cooling subsystem."	3.4.10 ACTIONS Note	~~N/A~~ 3.4.9.2 Actions
A.4	Changes CTS 3.4.9.2 Action b and CTS 4.4.9.2 to agree with the LCO, which specifically allows a recirculation pump to be in operation as an acceptable method for assuring the necessary flow conditions, in lieu of operating an RHR shutdown cooling pump.	3.4.10 ACTION B, SR 3.4.10.1	3.4.9.2 Action b, 4.4.9.2

, WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.11, RCS Pressure and Temperature (P/T) Limits		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.11	3/4.4.6.1, 4.4.1.1.2, 3/4.4.1.4
A.2	Clarifies Action to "perform an engineering evaluation..." with Notes that state the determination of the acceptability of the RCS for continued operation must be completed any time the requirements of the LCO are not met.	3.4.11 Conditions A and C Notes	3.4.6.1 Action
A.3	Changes CTS 3.4.6.1 Action to "restore the temperature and/or pressure...within 30 minutes" to "initiate action to restore ...Immediately" for conditions other than MODES 1, 2, and 3.	3.4.11 Required Action C.1	3.4.6.1 Action
A.4	Deletes CTS 4.4.6.1.3 since it duplicates the regulations found in 10CFR50 Appendix H.	N/A	4.4.6.1.3
A.5	Adds Notes for SRs 3.4.11.8 and 3.4.11.9 to clarify the current intent in CTS 4.4.6.1.4.a (periodic verification that reactor vessel and head flange temperatures are $\geq$ 70 °F) of allowing entry into the applicable conditions (i.e., $\leq$ 90 °F and $\leq$ 80 °F) without having performed these SRs.	SR 3.4.11.8, SR 3.4.11.9	4.4.6.1.4.a
A.6	Deletes CTS 4.4.6.1.4.b requirement to verify the reactor vessel and head flange temperatures within 30 minutes prior to tensioning of the head bolting studs, as it is duplicative of ITS SR 3.0.1.	~~N/A~~ SR 3.0.1	4.4.6.1.4.b
A.7	Combines CTS 4.4.1.1.2 and 3.4.1.4 requirements into the RCS P/T Limits Specification, with the words "and the recirculation loop temperature requirements" added to the ITS 3.4.11 LCO statement. The actual description of the requirements and the limits are found in ITS SR 3.4.11.3, SR 3.4.11.4, SR 3.4.11.5, and SR 3.4.11.6.	LCO 3.4.11, SR 3.4.11.3, SR 3.4.11.4, SR 3.4.11.5, SR 3.4.11.6	LCO 3.4.1.4, 4.4.1.1.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	3/4.6.1.1, 3/4.6.1.2, 3/4.6.1.4, 3.6.2.1.b, 3.6.2.1 Action e, 4.6.2.1.d, e and f
A.2	Replaces the definition of PRIMARY CONTAINMENT INTEGRITY and the references to it in CTS 3.6.1.1 with the requirement for primary containment to be OPERABLE, since all the requirements are specifically addressed in ITS 3.6.1.1 for the primary containment along with the remainder of the LCOs in the Primary Containment Section. In addition, a 1 hour time to restore primary containment leakage to within limits is provided in ITS 3.6.1.1 ACTION A, consistent with the current requirement.	LCO 3.6.1.1, 3.6.1.1 ACTION A	3/4.6.1.1
A.3	Deletes cross reference to CTS 3.10.1, since the format of the ITS does not include providing "cross references".	N/A	3.6.1.1 Applicability footnote *
A.4	Primary containment leakage rate requirements (10 CFR 50 Appendix J, Type A, B and C tests) are presented as a supporting surveillance for Primary Containment OPERABILITY, which references the 10 CFR 50 Appendix J Testing Program Plan in the Administrative Controls Section of the ITS. In addition, CTS 4.6.1.2.4, which precludes the use of CTS 4.0.2 for the leak rate tests, has been deleted since it is duplicative of CTS 6.8.4.f, the 10 CFR 50 Appendix J Testing Program Plan.	SR 3.6.1.1.1, 5.5.12	4.6.1.1, 3.6.1.2.a and b, 4.6.1.2.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
~~A.12~~ NONE	CTS 4.6.1.1.b verifies that all penetrations not capable of being closed by automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges or deactivated automatic valves secured in their position, except as provided in CTS 3.6.3. In the ITS, the surveillance is relocated from the CTS Primary Containment Integrity Specification (CTS 3/4.6.1.1) to the ITS Primary Containment Isolation Valve Specification (ITS 3.6.1.3) and broken up into two ~~specifications~~ - one for valves and blind flanges outside containment and one for valves and blind flanges inside containment. During the review of the conversion submittal, a difference of opinion arose between the Staff and the Licensee as to what would constitute a failure of this CTS surveillance and what appropriate actions should be taken. The Staff concedes that the wording and structure of the Nine Mile Point 2 CTS would allow numerous interpretations on how CTS 4.6.1.1.b is to be met and what actions to take if the surveillance is not met. Depending on which interpretation is used, the change from the CTS to the ITS could be characterized as Administrative, More Restrictive, Less Restrictive or a combination of the three types of change. The purpose of the conversion to the Improved Standard Technical Specifications is to correct these type of problem areas. The Nine Mile Point 2 ITS provides the appropriate surveillances and Actions, if the surveillance is not met, to correct the ambiguity of the CTS while not degrading the safe operation of the Plant. Thus, the staff finds that the change to the ITS for this CTS ~~specification~~ is acceptable.	3.6.1.3 SURVEILLANCES FOR THE VALVES AND BLIND Deactivated automatic valves are covered Actions	3.4.6.1.1 4.6.1.1.b MANUAL FLANGES by required
	SURVEILLANCE		
	3.6.1.2, Primary Containment Air Locks		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	3/4.6.1.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes cross reference to CTS 3.10.1, since the format of the ITS does not include providing cross references.	N/A	3.6.1.3 Applicability footnote *
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each air lock," which is consistent with the intent of the CTS.	3.6.1.2 ACTIONS Note 2.	3.6.1.3 Actions
A.5	Adds ITS Required Actions Notes "Required Actions...are not applicable if...Condition C is entered", recognizing that if both doors in the same air lock are inoperable, then an "OPERABLE" door does not exist to be closed (ITS 3.6.1.2 Required Actions A.1, A.2, A.3, B.1, B.2, and B.3 cannot be met).	3.6.1.2 Required Actions A and B Note 1	3.6.1.3 Actions
A.6	The revised presentation of CTS 3.6.1.3 Action a.1 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	~~3.0.3~~ LCO 3.0.2	3.6.1.3 Action a.1
A.7	The requirement for performing the overall air lock leakage test is a requirement of 10 CFR 50 Appendix J, and this requirement is embodied in ITS SR 3.6.1.2.1. It is possible that the test would not be able to be performed with an inoperable air lock door, and a plant shutdown would be required due to the inability to perform the required Surveillance. However, this restriction on continued operation need not be specified (i.e., CTS 3.6.1.3 Action a.2 is deleted) since it exists inherently as a result of the required Appendix J testing. Since the ITS ACTIONS are revised to eliminate the reference to this Surveillance restriction, the exception to Specification 3.0.4 applicability (CTS 3.6.1.3 Action a.4) is not necessary and is deleted, because ITS 3.0.4 allows MODE changes provided continued operations is allowed in the ACTIONS.	SR 3.6.1.2.1	3.6.1.3 Actions a.2 and a.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	CTS 3.6.3 Action a and CTS 3.4.7 Action a.1 do not specify penetrations with one or two isolation valves. However, ITS 3.6.1.3 Condition A applies if the affected penetration has two valves, and only one is inoperable. In the case of containment penetrations designed with only one isolation valve, the system boundary is considered an adequate barrier and the penetration is not considered "open" when the single isolation valve is open.	3.6.1.3 Condition A	3.6.3 Action a, 3.4.7 Action a.1
A.5	The revised presentation of CTS 3.6.3 Actions a.1 and b.1, ~~and~~ CTS 3.4.7 Action a.1.a, and CTS 3.6.1.7 Action b does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	~~3.0.3~~ LCO 3.0.2	3.6.3 Actions a.1 and b.1, 3.4.7 Action a.1.a, 3.6.1.7 Action b
A.6	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 provides this allowance. Additionally, deletes the LCO 3.0.3 statement in CTS 3.6.3 Action b since it is redundant to the "Otherwise..." action. That is, LCO 3.0.3 is not applicable anyway since a shutdown action has been provided.	3.0.4 LCO	3.6.3 Actions a.4 and b, 3.4.7 Action b
A.7	CTS 4.3.7.7.c requires all the squib charges in the TIP System shear valves to be tested once per 90 months, with at least one squib being tested every 18 months. CTS 4.6.3.5.b requires each squib charge in each shear valve to be tested every 36 months, with at least one squib being tested every 18 months. Since the Frequency of CTS 4.6.3.5.b is more limiting, the CTS 4.3.7.7.c Frequency is changed to be consistent with CTS 4.6.3.5.b, except as discussed below. Proposed SR 3.6.1.3.10 will require one squib from each shear valve to be tested every 24 months on a staggered test basis. (The change in Frequency from 18 months to 24 months, and from 36 months to 48 months is discussed in DOC LD.1 for ITS 3.6.1.3.)	SR 3.6.1.3.10	4.3.7.7.c, 4.6.3.5.b
A.8	Incorporates the requirements, provisions, actions, and associated restoration times for MSIVs and purge valves into ITS 3.6.1.3, the primary containment isolation valve Specification.	3.6.1.3	3/4.4.7, 3/4.6.1.7, 3/4.6.3

INSERT FOR A.12 ATTACHED

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.9	Removes the test method (i.e., with air or nitrogen), since the test method is prescribed in the regulation (10 CFR 50, Appendix J).	N/A	4.6.1.2.2
A.10	The Surveillance Frequency of CTS 4.6.1.2.2 and 4.6.1.2.3 is specified in accordance with the 10 CFR 50 Appendix J Testing Program in CTS 6.8.4.f. The requirement of CTS 4.6.1.2.4 stating the provisions of Specification 4.0.2 are not applicable to these Surveillance Requirements is not required and is deleted since it is stated in the proposed 10 CFR 50 Appendix J Testing Program in ITS 5.5.12.	5.5.12	4.6.1.2.2, 4.6.1.2.3, 4.6.1.2.4
A.11	Deletes the allowable leakage rate for the MSIVs from Table 3.6.1.2-1, since these limits are provided in ITS SR 3.6.1.3.12.	SR 3.6.1.3.12	Table 3.6.1.2-1
	3.6.1.4, Drywell and Suppression Chamber Pressure		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.4	3/4.6.1.5
	3.6.1.5, Drywell Air Temperature		
A.1	Editorial changes, reformatting, and revised numbering.	~~3.3.3.1~~ 3.6.1.5	3/4.6.1.6
	3.6.1.6, RHR Drywell Spray		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.6	3/4.6.2.2
A.2	See M Table.		

Insert (Table A, Section 3.6.1.3)

A.12	The revised presentation of CTS 3.6.1.2 Action (Restore) d does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions. In addition, CTS 3.6.1.2 Action (Restore) c has been modified in ITS 3.6.1.3 Required Action D.1 to require isolation of the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange. This proposed Action is equivalent to the current restore action since the Note to ITS 3.6.1.3 Required Action D.1 requires that the isolation device used to satisfy Required Action D.1 must be verified to meet the applicable leakage rate limit of the inoperable valve. Thus, isolating the affected penetration with a device that meets the required leakage limits effectively restores the leakage rate to within limits, as is required by CTS.	3.6.1.3 Required Action D.1	3.6.1.2 Actions c and d

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.2.1, Suppression Pool Average Temperature		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.6.2.1
A.2	CTS 3.6.2.1.a.2 appears to require the 90°F and 105°F limits to apply at all times when in Operational Condition 1 or 2. However, these two limits actually apply when THERMAL POWER is > 1% RTP. This is shown by CTS LCO 3.6.2.1.a.2.b), which states that 110°F is the limit when ≤ 1% RTP. Therefore, the ITS LCO for these two limits is clarified to be at > 1% RTP, and the ACTIONS are modified to only require power to be decreased to ≤ 1% RTP in lieu of the CTS 3.6.2.1 Actions b, b.1, and b.2.a) to shutdown the unit to MODE 3 and MODE 4. Once THERMAL POWER is ≤ 1% RTP, the LCO is met if suppression pool temperature is ≤ 110°F, thus, a shutdown to MODE 3 and MODE 4 is not required, as stated in CTS 3.0.2.	LCO 3.6.2.1.a, LCO 3.6.2.1.b, 3.6.2.1 ACTION B	3.6.2.1.a.2, 3.6.2.1.a.2.a), 3.6.2.1 Actions b, b.1, and b.2.a)
A.3	Moves the requirements in CTS 3.6.2.1.b, 3.6.2.1 Action e, 4.6.2.1.d, 4.6.2.1.e, and 4.6.2.1.f, relating to the drywell-to-suppression chamber bypass leakage limit, to ITS 3.6.1.1.	3.6.1.1	3.6.2.1.b, 3.6.2.1 Action e, 4.6.2.1.d, 4.6.2.1.e, 4.6.2.1.f
	3.6.2.2, Suppression Pool Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.6.2.1, 3/4.5.3
A.2	Moves the requirements in CTS LCO 3.5.3.b, 3.5.3 Action b, and 4.5.3.2, relating to the suppression pool level requirements while in MODES 4 and 5, to ITS 3.5.2.	3.5.2	3.5.3.b, 3.5.3 Action b, 4.5.3.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	The CTS requires verification that each suppression pool spray valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. CTS recognizes that the suppression pool spray function is manually actuated and is interpreted such that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for RHR suppression pool spray the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves, for the suppression pool spray mode, the reference to check automatic valves has been deleted.	SR 3.6.2.4.1	4.6.2.2.a
3.6.3.1, Primary Containment Hydrogen Recombiners			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.6.6.1
A.2	Deletes the CTS 4.6.6.1.c system leakage rate test since it is duplicative of testing already required by 10 CFR 50, Appendix J, and is currently included as a Surveillance in the Leakage Rate Specification (CTS 4.6.1.2.1 and ITS SR 3.6.1.1.1).	SR 3.6.1.1.1	4.6.6.1.c
3.6.3.2, Primary Containment Oxygen Concentration			
A.1	Editorial changes, reformatting, and revised numbering.	~~3.3.7.1~~ 3.6.3.2	3/4.6.6.2
A.2	Deletes cross reference to CTS 3.10.5, since the format of the ITS does not include providing cross references.	N/A	3.6.6.2 Applicability footnote *

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.3.2 ACTION B	3.6.6.2 Applicability and Action
A.4	Deletes CTS 4.6.6.2, which requires oxygen concentration in primary containment to be verified within limit prior to entering the Applicability of CTS 3.6.6.2 (within 24 hours after THERMAL POWER is greater than 15% of RTP). This requirement does not need to be repeated as a separate Surveillance Frequency.	SR 3.0.4	4.6.6.2
	3.6.4.1, Secondary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	~~3.3.7.2~~ 3.6.4.1	3/4.6.5.1
A.2	Replaces the definition of SECONDARY CONTAINMENT INTEGRITY and the references to it in CTS 3.6.5.1 with the requirement for secondary containment to be OPERABLE, since all of the requirements are specifically addressed in the ITS and associated Bases for the Secondary Containment (3.6.4.1), the Secondary Containment Isolation Valves (3.6.4.2), and Standby Gas Treatment System (3.6.4.3).	3.6.4.1 3.6.4.2 6 3.6.4.3	3.6.5.1, 3.6.5.1 Action a, 4.6.5.1
A.3	Modifies the requirement to verify that one door in each access is closed to require one door in each access opening to be closed. The NMP2 design includes more than two doors on some of the accesses, and the NMP2 interpretation of this requirement is that for these accesses, there are multiple access openings, and each access opening must have one door closed.	SR 3.6.4.1.3	4.6.5.1.b.2
A.4	Moves the requirements in CTS 4.6.5.1.b.3, relating to the position of secondary containment isolation valves, to ITS 3.6.4.2.	3.6.4.2	4.6.5.1.b.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.4.2, Secondary Containment Isolation Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	3/4.6.5.2, ~~3/~~4.6.5.1.b.3
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path." Additionally, adds ITS ACTIONS Note that facilitates the use and understanding of the intent to consider the affect of inoperable isolation valves on other systems. For a system made inoperable by inoperable SCIVs the applicable ACTIONS for that system also apply. This is consistent with the intent of the CTS.	3.6.4.2 ACTIONS Notes 2 and 3	3.6.5.2 Actions
A.3	The CTS 3.6.5.2 Action does not specify penetrations with one or two isolation valves. However, ITS 3.6.4.2 Condition A only applies if one valve in a penetration is inoperable, inherently ensuring maintaining "at least one isolation valve OPERABLE."	3.6.4.2 Condition A	3.6.5.2 Action
A.4	The revised presentation of the CTS 3.6.5.2 Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	~~3.0.3~~ LCO 3.0.2	3.6.5.2 Action
	3.6.4.3, Standby Gas Treatment System		
A.1	Editorial changes, reformatting, and revised numbering.	~~3.3.8.2~~ 3.6.4.3	3/4.6.5.3
A.2	Moves the requirements in CTS 3.6.5.3 Actions a.1 and b.1, including footnote **, concerning suspension of venting and purging when one or both SGT subsystems are inoperable, to ITS 3.6.1.3.	3.6.1.3	3.6.5.3 Actions a.1 and b.1, including footnote **
A.3	Deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable provided an Operable SGT subsystem is in operation, since ITS LCO 3.0.4 provides this allowance.	3.0.4 LCO	3.6.5.3 Action a.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Revises the terminology associated with the heater status from "OPERABLE" to "operating," since it is necessary for the heaters to actually operate (cycle properly when required) to reduce moisture from the absorbers and HEPA filters.	SR 3.6.4.3.1	4.6.5.3.a
A.5	Moves the filter testing requirements in CTS 4.6.5.3.b including footnote *, 4.6.5.3.c, 4.6.5.3.d.1, 4.6.5.3.d.4, 4.6.5.3.e, and 4.6.5.3.f to ITS 5.5.7. Adds a Surveillance Requirement to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the SGT System.	5.5.7, SR 3.6.4.3.2	4.6.5.3.b including footnote *, 4.6.5.3.c, 4.6.5.3.d.1, 4.6.5.3.d.4, 4.6.5.3.e, 4.6.5.3.f
A.6	Divides CTS 4.6.5.3.d.2.b, which verifies each SGT subsystem starts on the appropriate automatic initiation signals, into two Surveillances. The majority of the instrumentation testing will be performed in SR 3.3.6.2.5, and the actual system functional test portion, which will ensure the SGT System starts on an initiation signal, will be performed as SR 3.6.4.3.3.	SR 3.3.6.2.5, SR 3.6.4.3.3	4.6.5.3.d.2.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

INCLUDING FOOTNOTE *

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Enhances presentation by requiring actions to be immediately initiated to suspend OPDRVs versus the CTS action of immediately "suspend...operations with a potential for draining the reactor vessel."	3.7.2 Required Action E.3	3.7.3 Action b.2
A.6	Revises, from OPERABLE to operating, the requirement which verifies each CREF subsystem is operated with the heaters OPERABLE, since it is necessary for the heaters to actually operate (cycle properly when required) to reduce moisture from the adsorbers and HEPA filters.	SR 3.7.2.1	4.7.3.b
A.7	Moves the filter testing requirements of CTS 4.7.3.c, 4.7.3.d, 4.7.3.e.1, 4.7.3.e.3, 4.7.3.f, and 4.7.3.g, including footnote *, to ITS 5.5.7. Adds a Surveillance Requirement (proposed SR 3.7.2.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the CREF System.	SR 3.7.2.2, 5.5.7	4.7.3.c, 4.7.3.d, 4.7.3.e.1, 4.7.3.e.3, 4.7.3.f, 4.7.3.g
A.8	Divides the CTS Surveillance into three Surveillances that verify each CROASFT starts on the appropriate automatic signals and verify the control room envelope boundary leakage is maintained within limits, with the majority of the instrumentation testing performed in ITS SR 3.3.7.1.5 and the actual system functional test portion and the control room boundary leakage portion performed in ITS SR 3.7.2.3 and ITS SR 3.7.2.4, respectively.	SR 3.3.7.1.5, SR 3.7.2.3, SR 3.7.2.4	4.7.3.e.2
3.7.3, Control Room Envelope Air Conditioning (AC) System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.7.3
A.2	Splits requirements into separate Technical Specifications: ITS 3.7.2 for the CREF System and ITS 3.7.3 for the Control Room Envelope AC System.	3.7.3	3.7.3 (including footnote *), 4.7.3.a

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Adds Required Actions to specifically identify methods of exiting the Applicability of the LCO if one control room envelope AC subsystem is inoperable, identical to those provided in CTS for both subsystems inoperable.	3.7.3 Required Actions C.2.1, C.2.2, and C.2.3	3.7.3 Action b.2
A.4	Enhances presentation by requiring actions to be immediately initiated to suspend OPDRVs versus the CTS action of immediately "suspend...operations with a potential for draining the reactor vessel."	3.7.3 Required Action E.3	3.7.3 Action b.2
A.5	Adds an ACTION to clarify current requirements by directing entry into LCO 3.0.3 if both control room envelope AC subsystems are inoperable and control room envelope AC system safety function is not maintained in MODE 1, 2, or 3.	3.7.3 ACTION D	3.7.3
	3.7.4, Main Condenser Offgas		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.4	3/4.11.2.7
A.2	Clarifies the CTS by adding to the LCO the 30 minute decay period for the radioactivity rate of noble gases downstream of the recombiner. This is appropriate because the accident analysis that assumes the radioactivity rate of 350,000 microcuries/second also assumes that the radioactivity rate is after a 30 minute decay period.	LCO 3.7.4	LCO 3.11.2.7
	3.7.5, Main Turbine Bypass System		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.5	3/4.7.7, 3.2.3 Action b
A.2	Adds an LCO option to permit a MCPR penalty to be applied in lieu of maintaining the Main Turbine Bypass System OPERABLE, consistent with the current licensing basis as indicated in CTS 3.2.3 Action b.	LCO 3.7.5	~~N/A~~ 3.2.3 Action b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (an entire division may be without power), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a division.	3.8.1 Action D Note	3.8.1.1 Actions
A.6	Deletes references to "take the ACTION required by..." in CTS 3.8.1.1 Actions d and e, since the format of the ITS does not include providing "cross references". The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references.	N/A	3.8.1.1 Actions d and e ~~3.8.1.1~~
A.7	With three or more AC sources inoperable, ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. Since CTS 3.8.1.1 does not provide Actions for these conditions, ITS 3.8.1 ACTION G is added to direct entry into ITS LCO 3.0.3 to preserve the existing intent for CTS 3.0.3 entry.	3.8.1 ACTION G	3.8.1.1 Actions
A.8	Deletes description of the start signals for the DG normal 31 day Surveillance test, as these signals are the only signals that can be used to start the DGs and are described in the USAR.	N/A	4.8.1.1.2.a.-4.c)
A.9	The CTS 4.8.1.1.2.e existing limitation on 18-month Surveillances to perform them "during shutdown" is more specifically presented in the proposed Surveillances. Each proposed SR contains a specific Note limiting the performance in certain MODES. Additionally, the ITS Notes clearly present the allowance of the current practice of taking credit for unplanned events, provided the necessary data is obtained.	3.8.1 Individual Surveillance Requirements Notes	4.8.1.1.2.e

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	The fuel oil storage and starting air requirements of CTS 3.8.1.1 and 3.8.1.2 have been moved to a new ITS LCO 3.8.3. An LCO Statement has been provided requiring fuel oil storage and starting air. The Applicability of this new LCO is "when associated DG is required to be OPERABLE." This covers the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements of CTS 3.8.1.1 and 3.8.1.2.	3.8.3	3.8.1.1 3.8.1.2
A.3	Moves the details in CTS LCO 3.8.1.1.b.2 and LCO 3.8.1.2.b.2 relating to the required storage tank levels to ITS SR 3.8.3.1.	SR 3.8.3.1	LCO 3.8.1.1.b.2, LCO 3.8.1.2.b.2
A.4	Adds ITS ACTIONS Note, "Separate Condition entry is allowed for each DG"/, WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.8.3 ACTIONS Note	3.8.1.1 Actions, 3.8.1.2 Actions
	3.8.4, DC Sources - Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.4	3/4.8.2.1
A.2	Moves the technical content of the battery cell parameter limits in CTS 4.8.2.1.a.1, 4.8.2.1.b.1, 4.8.2.1.b.3, and Table 4.8.2.1-1 to ITS 3.8.6.	3.8.6	4.8.2.1.a.1, 4.8.2.1.b.1, 4.8.2.1.b.3, Table 4.8.2.1-1
A.3	Deletes the reference in CTS 3.8.2.1 Action b to "take the ACTION required by Specification 3.5.1," since the format of the ITS does not include providing "cross references". ITS 3.5.1 adequately prescribes the Required Actions for an inoperable ECCS without such references.	N/A	3.8.2.1 Action b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	More specifically presents the existing limitation on 18-month Surveillances (to perform them "during shutdown") in the ITS Surveillances as a specific Note limiting the performance in certain MODES. Additionally, the ITS Notes clearly present the allowance of the current practice of taking credit for unplanned events, provided the necessary data is obtained.	SR 3.8.4.7 Note, SR 3.8.4.8 Note	4.8.2.1.d, 4.8.2.1.e, 4.8.2.1.f
3.8.5, DC Sources Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.5	3/4.8.2.2
A.2	Moves the technical content of the battery cell parameter limits in CTS 3/4.8.2.2 to ITS 3.8.6.	3.8.6	4.8.2.2
A.3	Deletes the reference in CTS 3.8.2.2 Action b to "take the ACTION required by Specifications 3.5.2 and 3.5.3," since the format of the ITS does not include providing "cross references". ITS 3.5.2 adequately prescribes the Required Actions for an inoperable ECCS without such references.	N/A	3.8.2.2 Action b
3.8.6, Battery Cell Parameters			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.6	3/4.8.2.1, 3/4.8.2.2
A.2	Presents the battery cell parameters limits in a separate LCO with appropriate ACTIONS and SRs. CTS 4.8.2.2 is being deleted since its provisions only reference requirements in CTS 4.8.2.1, which are contained in ITS 3.8.6.	3.8.6	3/4 ~~4~~.8.2.1, 3/4 ~~4~~.8.2.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Applicability presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements (actually more restrictive for the DC power subsystems since more than one of the batteries may be required in MODES 4 and 5 since the DC sources Applicability has been changed - see DOC M.1 for ITS 3.8.5).	3.8.6 Applicability	3.8.2.1 Applicability, 3.8.2.2 Applicability
A.4	Adds ITS ACTIONS Note "Separate condition entry is allowed for each battery," which is consistent with the intent of the CTS.	3.8.6 ACTIONS Note	Table 4.8.2.1-1 Notes
A.5	Adds a specific Condition to explicitly require the battery to be declared inoperable when the temperature is not within limit or when Category A or B limits have not been restored within the applicable time, since this is the obvious intent of the CTS.	3.8.6 ACTION B	3.8.2.1 Actions, 3.8.2.2 Actions, Table 4.8.2.1-1 Notes
3.8.7, Inverters Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.7	3/4.8.3.1
A.2	Divides CTS 3.8.3.1 into two Specifications: 1) the OPERABILITY requirements of the inverters are included in ITS 3.8.7, "Inverters - Operating," and 2) the OPERABILITY requirements of the AC Distribution System are included in ITS 3.8.8, "Distribution System - Operating." In addition, the inverters are required to be "OPERABLE" in ITS 3.8.7, in lieu of "energized," as required by CTS 3.8.3.1.	3.8.7, 3.8.8	3/4.8.3.1
3.8.8, Distribution Systems Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.8	3/4.8.3.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Presents the requirements of the distribution system in ITS 3.8.8, "Distribution System – Operating", while the requirements on the source of electrical power for the 120-volt AC distribution system have been moved to a separate LCO (ITS 3.8.7, "Inverters – Operating").	3.8.7, 3.8.8	3/4.8.3.1
A.3	Deletes the reference in CTS 3.8.3.1 Actions a.2 and b.2 to "take the ACTION required by Specification 3.5.1," since the format of the ITS does not include providing "cross references." ITS 3.5.1 adequately prescribes the Required Actions for an inoperable ECCS without such references.	N/A	3.8.3.1 Actions a.2 and b.2
3.8.9, Distribution Systems Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.9	3/4.8.3.2
A.2	Deletes the reference in CTS 3.8.3.2 Actions a.2 and b.2 to "take the ACTION required by Specifications 3.5.2 and 3.5.3," since the format of the ITS does not include providing "cross-references". ITS 3.5.2 adequately prescribes the Required Actions for an inoperable ECCS without such references.	N/A	3.8.3.2 Actions a.2 and b.2

ADD ATTACHED

TABLE A - ADMINSITRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

Current Specification 3/4.8.1 - AC Circuits Inside Primary Containment			
None	None	None	None
Current Specification 3/4.8.4.2 - Primary Containment Penetration Conductor Overcurrent Protective Devices			
None	None	None	None
Current Specification 3/4.8.4.3 - Emergency Lighting System - Overcurrent Protective Devices			
None	None	None	None

ADD TO TABLE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Adds ITS Note "Separate Condition entry is allowed for each required channel," WHICH IS CONSISTENT WITH THE INTENT OF THE CTS.	3.9.4 ACTIONS Note	N/A
	3.9.5, Control Rod Operability Refueling		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.5	3/4.1.3.5
A.2	Revises the Operational Condition 5 requirements of CTS 3.1.3.5 to say "Each withdrawn control rod shall be OPERABLE," since ITS 3.9.5 includes requirements other than accumulator requirements.	LCO 3.9.5	LCO 3.1.3.5
A.3	Deletes the Applicability footnote * cross reference to CTS 3.9.10.1 and 3.9.10.2, since the format of the ITS does not include providing cross references.	N/A	LCO 3.1.3.5
A.4	Deletes the action to disarm the associated directional control valves. During MODE 5 with an accumulator associated with a withdrawn control rod inoperable, the control rod is required to be inserted. Once the control rod is fully inserted, the accumulator is no longer required to be OPERABLE and the entry conditions for the ACTIONS are no longer applicable, thus no additional ACTIONS are required.	N/A	3.1.3.5 Action b.1
A.5	Moves, to ITS 3.10.8, the requirements for when more than one control rod is withdrawn with the associated scram accumulators inoperable.	3.10.8	3.1.3.5 Action b.2
A.6	Deletes "unless the control rod is inserted and disarmed or scrammed," since stating the conditions for an exception to performance of the accumulator Surveillance that are equivalent to the Applicability of the LCO is unnecessary.	N/A	4.1.3.5.a
	3.9.6, RPV Water Level Irradiated Fuel		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.6	3/4.9.8

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	Four new Notes have been added for clarity in ITS 3.10.4. The ITS 3.10.4 ACTIONS Note has been added to clarify that the requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications. ITS 3.10.4 Required Action A.1 Note 1 has been added to clarify that if an affected Specifications ACTIONS state to fully insert all insertable control rods, this includes placing the reactor mode switch in the Shutdown position. ITS 3.10.4 Required Action A.1 Note 2 has been added to clarify that this Required Action is only applicable if the requirement not met is an LCO, since it is written only for an LCO, not a "requirement." SR 3.10.4.2 Note has been added clarifying that if SR 3.10.4.1 is satisfied for ITS 3.10.4.c.1 requirements, then SR 3.10.4.2 is not required to be performed.	3.10.4 ACTIONS Note, 3.10.4 Required Action A.1 Notes 1 and 2, SR 3.10.4.2 Note	N/A
A.8	The action to lock the reactor mode switch in the Shutdown position when the one-rod-out interlock is inoperable has been deleted. The CTS 3.9.1 Applicability, as it relates to ITS 3.10.4, is MODE 2 when the reactor mode switch is in the Refuel position. Thus, once the reactor mode switch is moved from the Refuel position to the Shutdown position, the LCO is no longer applicable, and the mode switch does not have to be locked.	N/A → 4	3.9.1 Action b
A.9	Replaces the refuel position one-rod-out interlock Surveillances with a generic Surveillance Requirement to perform all required Surveillances in accordance with the applicable SRs; in this case, with the SRs of ITS 3.9.2, Refuel Position One-Rod-Out Interlock.	SR 3.10.4.1	4.9.1.1, 4.9.1.2, 4.9.1.3
3.10.5, Single Control Rod Drive Removal Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.5	3/4.9.10.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Added a MODE 5 Applicability requirement in ITS 3.10.6 ("with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met") that is derived from the intent of CTS 3.9.10.2, which says "Any number of control rods and/or control rod drive mechanisms may be removed from the core and/or reactor pressure vessel..." During the performance of these activities, ITS 3.9.3 (which requires all control rods to be fully inserted), ITS 3.9.4 (which requires each control rod full-in position indication channel for each control rod to be OPERABLE), and ITS 3.9.5 (which requires all withdrawn control rods to be OPERABLE) are not met.	LCO 3.10.6	LCO 3.9.10.2
A.6	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.⊕6 Required Action A.3.1	N/A
A.7	Deletes the requirement that dedicated procedures be followed since refueling procedures are currently required by CTS 6.8.1.a and ITS 5.4.1.a (refueling procedures are referenced in Appendix A of RG 1.33, Rev. 2).	N/A	LCO 3.9.10.2.f footnote *, 4.9.10.2.1.f footnote *
3.10.7, Control Rod Testing Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.7	3/4.10.2
A.2	Deletes references to RSCS, since an NRC SER has apprcved operation with only one rod pattern control system OPERABLE (RWM).	N/A	LCO 3.10.2, ~~3.10.2 Action~~ 4.10.2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.5, Control Rod Scram Accumulators			
L.1	Provides the option to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient in lieu of declaring the control rod inoperable. The option for declaring the control rod with an inoperable accumulator "slow" is restricted to control rods not previously known to be "slow". Additionally, with more than one accumulator inoperable, in lieu of the requirement to declare the associated control rod inoperable immediately and to insert and disarm the associated control rod drive or shutdown the unit, actions will allow the affected control rods to be declared slow or inoperable, as applicable, in 1 hour. The requirement for declaration of control rods as slow or inoperable is limited to 1 hour. The 1 hour will only be allowed provided the control rod drive header pressure alone is sufficient to insert control rods if a SCRAM is required; OR b) ALL affected control rods are fully INSERTED	3.1.5 Required Actions A.1, B.2.1, B.2.2, and C.2 : a)	3.1.3.5 Action a.2	4, 6
L.2	Extends the requirement for declaring the associated control rod inoperable when one accumulator is inoperable and reactor pressure is less than 900 psig to 1 hour.	3.1.5 Required Action C.2	3.1.3.5 Action a.1.b)	6
L.3	Deletes the control rod accumulator leak detectors, pressure detectors, and alarm Surveillances as they do not necessarily relate directly to accumulator OPERABILITY.	N/A	4.1.3.5.b	3
	3.1.6, Rod Pattern Control			
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.1.1, RPS Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST and the RPS RESPONSE TIME TEST.	SR 3.3.1.1.13, SR 3.3.1.1.16	4.3.1.2 for Table 4.3.1.1-1, all Functional Units except 2.a, 2.b, 2.c, 2.d, and 2.e	10
LD.2	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for Reactor Mode Switch-Shutdown Position Function.	SR 3.3.1.1.12	4.3.1.1 for Table 4.3.1.1-1 Functional Unit 11	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.13 for Functions 1.a, 3, 4, 5, 6, 7.b, 8, and 9	4.3.1.1 for Table 4.3.1.1-1 Functional Units 1.a, 3, 4, 5, 7, 8.b, 9, and 10	10
LE.2	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.13 for Functions 2.a, 2.b, and 2.c	4.3.1.1 for Table 4.3.1.1-1 Functional Units 2.a, 2.b, and 2.c	10

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.3.2.1, Control Rod Block Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for Reactor Mode Switch Shutdown Position.	SR 3.3.2.1.6	CHANNEL FUNCTIONAL TEST for Table 4.3.6-1 Trip Function 6.a	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.2.1.7	CHANNEL CALIBRATION for Table 4.3.6-1 Trip Functions 1.a and 1.c	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.6, 3.3.6 Action a, Table 3.3.6-2	1
L.2	Adds a note for the Reactor Mode Switch Shutdown Position, which extends,for up to one hour, the time to perform the CHANNEL FUNCTIONAL TEST after placing the reactor mode switch in the shutdown position.	SR 3.3.2.1.6	CHANNEL FUNCTIONAL TEST for Table 4.3.6-1 Trip Function 6.a	3
L.3	Reduces the RWM low power setpoint from 20% RTP to 10% RTP.	3.3.2.1, Table 3.3.2.1-1 Function 2	3.1.4.1.	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Modifies the Applicability for the Feedwater System and Main Turbine High Water Level Trip Instrumentation from Mode 1 to when THERMAL POWER is ≥ 25% RTP, and changes the current shutdown action to only require power to be reduced to < 25% RTP. In addition, reduces the time to achieve this power level from 6 hours to 4 hours.	3.3.2.2 Applicability, 3.3.2.2 ACTION C	Tables 3.3.9-1 and 4.3.9.1-1, Table 3.3.9-1 Actions 140.a and b	2, 5, 6
L.3	Deletes the details relating to the Instrument Numbers for the Feedwater System/Main Turbine Trip System Instrumentation.	N/A	Table 3.3.9-1	1
L.4	Changes the CTS Actions requirements to restore an inoperable Feedwater System/Main Turbine Trip System channel to OPERABLE status to allow the channel to be placed in the tripped condition and to continue operations without a requirement to restore the channel.	3.3.2.2 Required Actions A.1 and B.1	Table 3.3.9-1 Actions 140.a and 140.b	5
L.5	CTS requires reduction in Thermal Power if the Feedwater System/Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in place of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker.	3.3.2.2, Required Action C.1	N/A	5
L.6	CTS does not provide any actions when all three Feedwater System/Main Turbine Trip System channels are inoperable. Therefore, a CTS 3.0.3 entry would be required. ITS 3.3.2.2 ACTION B will allow all three channels to be inoperable for up to 2 hours, consistent with the Actions for when the MCPR limit is not being met and when two channels are inoperable.	3.3.2.2 ACTION B	N/A	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.3.1, Post Accident Monitoring Instrumentation			
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.1.3 for Functions 1-8 and 11	4.3.7.5 for Table 4.3.7.5-1 Instruments 1-5, 7, 8, 11, and 12	10
L.1	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	3.3.3.1 Surveillance Requirements Note 2	N/A	6 & 8
L.2	If one PCIV indication is inoperable in a penetration flow path with only one PCIV indication, CTS requires the channel to be restored to Operable status within 7 days or the unit must be shut down. ITS provides 30 days to restore the inoperable channel. At the expiration of the 30 days, ITS requires a special report to be submitted per ITS 5.6.6, in place of requiring a unit shutdown.	3.3.3.1 ACTIONS A and B	Table 3.3.7.5-1 Instrument 12, footnote ** and Action 80b	5,6
	3.3.3.2, Remote Shutdown System			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SR that ensures the Remote Shutdown System transfer switches and control circuits will perform the intended function.	SR 3.3.3.2.2	4.3.7.4.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.2.3	Table 4.3.7.4-1 CHANNEL CALIBRATION for Instruments 1 through 13	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Extends from 7 days to 30 days the allowed outage time for inoperable Remote Shutdown System instrumentation and controls.	3.3.3.2 ACTION A	3.3.7.4 Actions a and b	6 7
L.2	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances.	3.3.3.2 Surveillance Requirements Note	N/A	6 3
L.3	The CTS requires a Channel Check to be performed for deenergized instruments during normal operation. No specific acceptance criteria appliees to a Channel Check perfomed on instrumentation that is not showing proper indication. The ITS excludes the Channel Check requirement for deenergized channels.	SR 3.3.3.2.1	4.3.7.4.1 for Table 4.3.7.4-1 Instrument 12	3
3.3.4.1, EOC-RPT Instrumentation				
LB.1	Extends from 12 hours to 72 hours the allowed out of service time when one or more channels are inoperable, but EOC-RPT trip capability is maintained.	3.3.4.1 ACTION A	3.3.4.2 Actions b and c.1	6 7
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and EOC-RPT RESPONSE TIME TEST (EXCEPT BREAKER ARC SUPPRESSION TIME)	SR 3.3.4.1.3, SR 3.3.4.1.5	4.3.4.2.2, 4.3.4.2.3	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION ~~of the Turbine Stop Valve Closure and Turbine Control Valve Fast Closure Functions~~	SR 3.3.4.1.2	4.3.4.2.1 for Table 4.3.4.2-1 Trip Functions 1 and 2	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 2 hour Completion Time to restore trip capability when one or more Functions have lost EOC-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the EOC-RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip.	ITS 3.3.4.1 ACTION B	3.3.4.2 Actions d and e	6 5
L.5	The time in the CTS provided to restore channels to Operable status if both Trip Systems are affected, or the time to apply the MCPR EOC-RPT inoperable limit, has been extended from 1 hour to 2 hours in the ITS consistent with the time provided in the ITS to restore a MCPR limit.	3.3.4.1 ACTION B	3.3.4.2 Action e, 3.2.3 Action a	6
L.6	Adds a surveillance to allow the breaker arc suppression portion of the EOC-RPT System Response Time test to be extended from 18 months to 60 months, based on the difficulty of performing the test and the reliability of the circuit breakers. Due to this change, a Note has also been added to allow the breaker arc suppression time for the normal 24 month test to be assumed from the most recent performance of SR 3.3.4.1.6.	SR 3.3.4.1.6, SR 3.3.4.1.5 Note	4.3.4.2.3	3
	3.3.4.2, ATWS-RPT Instrumentation			
LB.1	The ITS extends the allowed out of service time for one or more channels inoperable is extended from 24 hours to 14 days and for two or more channels inoperable from 78 hours to 14 days provided ATWS-RPT trip capability in both Functions is maintained.	3.3.4.2 Required Action A.2	3.3.4.1 Actions b, c.1, including footnote *	6 7

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST of the ATWS-RPT instrumentation.	SR 3.3.4.2 ~~7~~ 6	4.3.4.1.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.2 ~~6~~ 5	4.3.4.1.1 for Table 4.3.4.1-1 Trip Functions 1 and 2	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.4.1, 3.3.4.1 Action a, Table 3.3.4.1-2	1
L.2	When two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability and providing the required initiation capability of the instrumentation.	3.3.4.2 Required Action A.1	3.3.4.1 Action c.2	5
L.3	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore ATWS-RPT trip capability for one Function when both Functions have not maintained trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS-RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip.	3.3.4.2 ACTION B	3.3.4.1 Actions d and e	6 ~~5~~

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LB.2	For one trip system, the CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. For both trip systems, the CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement ~~for both trip systems~~, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. The ITS does not include these requirements. The ITS establishes the requirement to place the inoperable channel(s) in trip within 12 hours, irrespective of the number of inoperable channels in a trip system. For the Reactor Vessel Water Level-Low, Level 3 and Drywell Pressure-High Functions, having a second channel inoperable is essentially the same as one channel inoperable, the associated valve(s) will not receive an isolation signal.	ITS 3.3.5.1 ACTION B	3.3.2 Actions b.1.a) and C.2.a)1)	~~A~~ 6
LB.3	The CTS allows a delay in entering the associated Action statement during performance of Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not specify maintaining trip capability of the Reactor Vessel Water Level-Low, Level 3 and Drywell Pressure-High Functions logic systems. Therefore, the Note has been modified to state "provided the associated Function or redundant Function maintains ECCS initiation capability."	3.3.5.1 Surveillance Requirements Note 2	Table 3.3.2-1 Note (b)	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Functions.	SR 3.3.5.1.6	4.3.3.2, 4.3.2.2, 4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.k, A.2.g, B.1.i, B.2.f, and C→(E) 1.h, including Note (a)	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing CHANNEL CALIBRATION.	SR 3.3.5.1.5	4.3.3.1 for Table 4.3.3.1-1 all Trip Functions other than A.2.b and B.2.b, 4.3.2.1 for Table 4.3.2.1-1, Trip Functions 1.a.3 and 1.b	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.2, 3.3.2 Action a, LCO 3.3.3, 3.3.3 Action a, Tables 3.3.2-2 and 3.3.3-2	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	CTS requires restoration of an ADS Trip System to Operable status when it is inoperable. CTS requires an inoperable ADS Reactor Vessel Water Level - Low, Level 3 (Permissive) channel to be restored to Operable status. ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability, and providing the required initiation capability of the instrumentation.	ITS 3.3.5.1 Required Action F.2	3.3.3 Action c, Table 3.3.3-1 Action 32	5
L.3	Increases from 100 psig to 150 psig the pressure at which ADS is required to be OPERABLE to provide consistency of the OPERABILITY requirements for all ECCS and RCIC equipment.	3.3.5.1 Applicability	Table 3.3.3-1 footnote (c), Table 4.3.3.1-1 footnote **, 3.3.3 Action c	2
L.4	ITS require Pump Suction Pressure-Low to be Operable in Modes 4 and 5 when HPCS is Operable (for compliance with LCO 3.5.2) and aligned to the CST when CST water level is not within the TS limits, in place of the CTS requirement of Modes 4 and 5 when HPCS is required Operable. ITS Function Suppression Pool Water Level—High is not required to be Operable in Modes 4 and 5, in place of the CTS requirement of Modes 4 and 5 when the HPCS System is required to be Operable.	Table 3.3.5.1-1 Functions 3.d and 3.f	Tables 3.3.3-1 and 4.3.3.1-1 Trip Functions C.1.d and C.1.e, including footnote *	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	CTS Table 3.3.3-1 Actions 30.b and 36.b require the associated ECCS to be declared inoperable immediately when more than one channel of a Trip Function is inoperable. These Actions apply to LPCS, LPCI, and ADS Reactor Vessel Water Level - Low, Low, Low, Level 1, HPCS Reactor Vessel Water Level - Low, Low, Level 2, and LPCS, LPCI, and HPCS Drywell Pressure - High. The ITS will allow 24 hours, 96 hours, or 8 days, as applicable, to place inoperable channels in trip when two channels of a Function are inoperable, prior to declaring the associated ECCS inoperable, provided ECCS initiation capability is maintained. However, this 24 hour, 96 hour, or 8 day time, as applicable, will only be allowed if the redundant ECCS (in the case of LPCS and LPCI) or trip system (in the case of ADS and HPCS) is maintaining initiation capability.	3.3.5.1 ACTIONS B and F	Table 3.3.3-1 Actions 30.b and 36.b	~~5~~ 6
L.6	CTS Action 20 requires a unit shutdown when a Reactor Vessel Water Level-Low, Level 3 or a Drywell Pressure-High channel is not placed in trip. These Functions actuate the Group 4 valves, which are not PCIVs, and actuates PCIVs covered by ITS 3.3.6.1 (ITS 3.3.6.1 will control the instrument requirements for the PCIVs). The Group 4 valves (RHR B discharge to radwaste valves and the RHR A and B heat exchanger sample valves) are valves that need to go closed to ensure the LPCI A and B flow is not diverted from injecting into the core. The ITS will allow isolation of the affected LPCI flow diversion flow path(s) in place of a unit shutdown. In addition, if the affected flow path(s) are not isolated, the ITS will require the associated LPCI subsystem to be declared inoperable immediately.	3.3.5.1 Required Action B.3.2, 3.3.5.1, ACTION H	Table 3.3.2-1 Action 20	5
L.7	Extends from 8 hours to 24 hours the Completion Time to restore the Manual Initiation Function for all ECCS Functions.	3.3.5.1 Required Action C.2	Table 3.3.3-1 Action 35	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.8	The CHANNEL FUNCTIONAL TEST of all Manual Initiation Functions in CTS Table 4.3.3.1-1 footnote (a) is performed at least once per 18 months during shutdown. The ITS Testing for these Functions does not include this restriction on plant conditions that requires the Surveillance to be performed while shutdown.	N/A	Table 4.3.3.1-1 footnote (a)	3
L.9	CTS Table 3.3.2-1 requires Reactor Vessel Water Level-Low, Level 3, and Drywell Pressure-High to close the Group 4 valves (the RHR Sample and Radioactive Waste valves). However, only one of the two in-series valves in each flow path needs to close to isolate the flow path and preclude flow diversion from the associated LPCI subsystem, and only one of the two valves in each flow path receives all signals and motive power from its own divisionalized power source. Therefore, the ITS will only require one valve in each flow path to be Operable, and the valve will be the associated divisionalized valve. This is identified in the Bases since the valve descriptions have been relocated to the Bases.	Table 3.3.5.1-1 Functions 1.a, 2.a, 1.d, and 2.d, 3.3.5.1 Required Action B.3.2	Table 3.3.2-1 Trip Function 1.a.3 and 1.b	4
L.10	Deletes the Manual Isolation Pushbutton Function for the Group 4 valves, along with all references to it.	N/A	Table 3.3.2-1 Trip Function 1.m	1
L.11	Revises the setpoints to reflect Allowable Values. While the addition of an upper Allowable Value for the three Functions appears more restrictive, the new upper Allowable Value is lower than the Allowable Value currently in the CTS.	Table 3.3.5-1 . Functions 1.l, 2.j, and 3.h	Table 3.3.3-2 Trip Functions A.1.j, B.1.h, and C.1.f	1

ADD ENTRY FOR L.12 (FROM REVISION B)
- ATTACHED

Insert (Table L, Section 3.3.5.1)

L.12	CTS Table 3.3.3-1 Action 35 requires declaring the associated ADS valve inoperable when the time to restore the inoperable ADS manual initiation channel (8 hours) has expired (the 8 hour restoration time has also been changed in the ITS to 24 hours as described in DOC L.7 above). Each ADS manual initiation channel affects all the ADS valves, thus Action 35 effectively requires all ADS valves to be declared inoperable. With all ADS valves inoperable, CTS 3.5.1 Action e.2 requires a unit shutdown. In lieu of requiring a unit shutdown, ITS 3.3.5.1 ACTION G will allow an additional 72 hours or 7 days to restore the channel, depending upon whether or not both HPCS and RCIC Systems are Operable.	3.3.5.1 ACTION G	Table 3.3.3-1 Action 35	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.5.2, RCIC Instrumentation			
LB.1	The CTS allowance to delay entering the associated Action statement when performing required surveillances has been clarified to allow the Manual Initiation Function to be inoperable and delay entering the associated ACTIONS for 6 hours, regardless of the remaining RCIC initiation capability of the Manual Initiation Function. For this Function, loss of one channel results in loss of RCIC initiation capability.	3.3.5.2 Surveillance Requirements Note 2	Table 3.3.5-1 footnote (a) for Functional Unit 4	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the RCIC Manual Initiation Function.	SR 3.3.5.2.5	4.3.5.2, 4.3.5.1 for Table 4.3.5.1-1 Functional Unit 4 including Note †	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATIONS for Reactor Vessel Water Level-Low Low, Level 2; Reactor Vessel Water Level-High, Level 8; and Pump Suction Pressure-Low (Transfer).	SR 3.3.5.2.4	4.3.5.1 for Table 4.3.5.1-1 Functional Units 1, 2, and 3	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.5, 3.3.5 Action a, Table 3.3.5-2	1
L.2	When one or more inoperable channels exist, in place of the CTS requirement to declare the RCIC System inoperable, the ITS provides the option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability with regard to system actuation, and providing the required initiation capability of the instrumentation.	ITS 3.3.5.2 Required Action B.2	Table 3.3.5-1 Action 50.b	4 5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	The CHANNEL FUNCTIONAL TEST of the RCIC Manual Initiation Function is performed at least once per 18 months during shutdown. The ITS Testing for this Function does not include the restriction on plant conditions that requires the surveillance to be performed while shutdown.	N/A	Table 4.3.5.1-1 footnote †	3
	3.3.6.1, Primary Containment Isolation Instrumentation			
LB.1	The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. The CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system.	3.3.6.1 ACTION A	3.3.2 Actions b.1.a) and c.2.a)1)	~~5~~ 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LB.2	The CTS allows a delay in entering the associated Action statement during performance of Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trips systems that have only one channel, the CTS unnecessarily restricts the plant from using the 6 hour allowance. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability."	3.3.6.1 Surveillance Requirements Note 2	Table 3.3.2-1 Note (b)	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, the ISOLATION SYSTEM RESPONSE TIME test and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Functions.	SR 3.3.6.1.6, SR 3.3.6.1.7	4.3.2.2, 4.3.2.3, 4.3.2.1 for Table 4.3.2.1-1 Trip Functions 1.m and 2.g	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION Surveillance.	SR 3.3.6.1.5	4.3.2.1 for Table 4.3.2.1-1 Trip Functions	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.2, 3.3.2 Action a, Table 3.3.2-2	1
L.2	CTS requires a unit shutdown when a Reactor Vessel Water Level-Low Low Low, Level 1 channel is not placed in trip. The ITS allows isolation of the affected main steam line in place of shutting down the unit.	3.3.6.1 Required Action D.1	Table 3.3.2-1 Action 20	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	The CTS Action required when Trip Function 1.h 5 and 1.m channels are inoperable and not tripped, requires establishment of the Reactor Building Integrity with Standby Gas Treatment System operating within 1 hour. In its place, the ITS will instead require the isolation of the containment purge valves (Group 9 valves) within 1 hour. In addition, if the Manual Initiation Function associated with the Group 8 and 9 valves is inoperable, the CTS action to establish Reactor Building Integrity is deleted. For Group 9 valves, the proposed requirement is changed to isolate the associated penetration, which fulfills the post accident function of the isolation logic.	ITS 3.3.6.1 ACTIONS F, G, and H	Table 3.3.2-1 Action 27	4 5
L.8	CTS Table 3.3.2-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 6 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 6 hours to 12 hours to allow for more orderly power reduction.	3.3.6.1 ACTION D	Table 3.3.2-1 Action 21	5, 6
L.9	The CTS Action that applies to CTS Manual Isolation Pushbutton for the Groups 1 and 8 valves, requires restoration of the Manual Isolation Function within 48 hours. The ITS will allow the isolation of the affected penetration flow path within 24 hours in place of restoring the Function.	ITS 3.3.6.1 ACTION G	Table 3.3.2-1 Action 25	4 5
L.10	The time allowed in the CTS to isolate the associated penetration if a Manual Isolation Function is inoperable is extended from 9 hours (8 hours to restore the channel and 1 hour to isolate the penetration) to 24 hours in the ITS.	3.3.6.1 ACTION G	Table 3.3.2-1 Action 26	6
L.11	The CTS requires locking the affected system isolation valves closed when the RHR Equipment Area Temperature-High or Reactor Vessel Pressure-High Functions are inoperable. The ITS only requires closure of the valve; locking is not required.	3.3.6.1 Required Action F.1	Table 3.3.2-1 Action 28	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.12	The CTS CHANNEL FUNCTIONAL TEST of all Manual Initiation Functions is performed at least once per 18 months during shutdown. The ITS surveillance testing for these Functions does not include this restriction on plant conditions that requires the Surveillance to be performed while shutdown.	N/A	Table 4.3.2.1-1 Footnote (c)	3
L.13	ITS include exceptions to response time test Main Steam Line (MSL) Isolation, Reactor Vessel Water Level-Low Low Low, Level 1, Main Steam Line Pressure-Low, and Main Steam Line Flow-High sensors and allows the design sensor response time to be used in ~~the~~ ← PLACE ~~determination of the ISOLATION SYSTEM RESPONSE TIME.~~	SR 3.3.6.1.7 Note OF TEST DATA.	4.3.2.3 for Table 4.3.2.1-1 Trip Functions 1.a.1), 1.c.2), and 1.c.3)	3
L.14	The ITS allows the associated SLC subsystem to be declared inoperable in place of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped.	3.3.6.1 Required Action I.1	Table 3.3.2-1 Action 22	4 5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.3.6.2, Secondary Containment Isolation Instrumentation				
LB.1	The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. The CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system.	3.3.6.2 ACTION A	3.3.2 Actions b.1.a) and c.2.a)1)	~~5~~ 6
LB.2	The CTS allows a delay in entering the associated Action statement during performance of Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trip systems that have only one channel, the CTS unnecessarily restricts the plant from using the 6 hour allowance. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability."	3.3.6.2 Surveillance Requirements Note 2	Table 3.3.2-1 Note (b)	6 ~~8~~
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST for the Secondary Containment Isolation Instrumentation and Standby Gas Treatment (SGT) actuation logic.	SR 3.3.6.2.5	4.3.2.2, 4.6.5.3.d.2	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.7.1, CREF System Instrumentation			
LB.1	The CTS allows a delay in entering the associated Action statement during performance of Surveillances "provided at least one other operable channel in the same Trip System is monitoring that Trip Function." These words do not provide assurance of maintaining the trip capability of the Function for this logic system design. Therefore, the note has been modified to state "provided the associated Function maintains CREF System initiation capability."	3.3.7.1 Surveillance Requirements Note 2	Table 3.3.2-1 Note (e)	6
LB.2	For an inoperable high drywell pressure or a reactor vessel water level low channel CTS require the associated CREF subsystem to be declared inoperable and the associated CTS Actions taken. The ITS allows 12 hours or 24 hours to trip a channel depending upon whether the instrumentation is common to RPS or ECCS prior to declaring the associated CREF subsystem inoperable (or starting the CREF subsystem, as described in DOC L.3 below). The ITS also allows up to 6 hours to perform required SRs prior to entering the associated ACTION, provided the associated Function maintains CREF initiation capability.	3.3.7.1 Surveillance Requirements Note, 3.3.7.1 Required Actions B.2 and C.2	4.7.3.e.2. (b)	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST of the CREF System Instrumentation.	SR 3.3.7.1.5	4.7.3.e.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION of the CREF main control room ventilation radiation monitors.	SR 3.3.7.1.4	4.3.7.1 for Table 4.3.7.1-1 Instrumentation 1	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	The instrumentation section of the CTS does not have specific requirements for the CREF System LOCA signals; it only has requirements for the high radiation signals. Therefore, when a high drywell pressure or a reactor vessel water level low channel is inoperable, the associated CREF subsystem must be declared inoperable. In CTS the two signals are required when the CREF System is required to be Operable; i.e., in Modes 1, 2, and 3, when irradiated fuel is being handled in the secondary containment, during Core Alterations, and during operations with a potential for draining the reactor vessel. The ITS provides requirements that two channels per trip system be Operable for each of the two Functions. This portion of the change is administrative since the channels are currently required in the CTS. However, the ITS provides reduced Applicability requirements limiting Reactor Vessel Water Level-Low Low, Level 2 operability to Modes 1, 2, and 3, and during operations with a potential for draining the reactor vessel, and limiting Drywell Pressure-High operability to to Modes 1, 2, and 3.	Table 3.3.7.1-1 Functions 1 and 2	4.7.3.e.2. (b)	2
L.3	When a high drywell pressure or a reactor vessel water level low channel is inoperable, the CTS requires the associated CREF subsystem to be declared inoperable. The CTS 3.7.3 Actions generally require restoration of the inoperable CREF subsystem. The ITS also requires declaring the associated CREF subsystem inoperable when an inoperable channel is not placed in trip within 24 hours. However, in place of declaring the associated CREF subsystem inoperable, the ITS also allows placing the associated CREF subsystem in the pressurization mode of operation-equivalent to performing the intended safety function of the instrumentation.	3.3.7.1 Required Action D.1	4.7.3.e.2. (b)	4 5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.7.2, Mechanical Vacuum Pump Isolation Instrumentation			
LB.1	The CTS requires placing the inoperable channel(s) in one trip system in the tripped condition within one hour when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems. As long as mechanical vacuum pump isolation capability is maintained, the ITS allows 12 hours to place the channel(s) in trip.	3.3.7.2 ACTION A	3.3.2 Action c.1	~~5~~ 6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST of the mechanical vacuum pump isolation actuation instrumentation.	SR 3.3.7.2.4	4.3.2.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION of the mechanical vacuum pump isolation instrumentation.	SR 3.3.7.2.3	4.3.2.1 for Table 4.3.2.1-1 Trip Function 1.c.1	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.2, 3.3.2 Action a, Table 3.3.2-2	1
L.2	Changes the Applicability for the Main Steam Line Radiation-High Function from MODES 1, 2, and 3 in the CTS to MODES 1 and 2 with any mechanical vacuum pump in service and any main steam line not isolated in the ITS. Additionally, CTS Actions require that the plant be in at least Startup with the associated isolation valves closed within 6 hours or be in at least Hot Shutdown within 12 hours and in Cold Shutdown within the next 24 hours, if the Action provisions of CTS are not met. ITS revises these requirements, providing four options: (1) Isolate the mechanical vacuum pumps within 12 hours; (2) Remove the associated vacuum pump breaker(s) from service; (3) Isolate the main steam lines within 12 hours; or (4) Be in MODE 3 within 12 hours.	3.3.7.2 Applicability and ACTION C	Table 3.3.2-1 including Action 21, Table 4.3.2.1-1	2, 5, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.8.1, Loss of Power Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST of the LOP Instrumentation.	SR 3.3.8.1.4	4.3.3.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION of the LOP Instrumentation.	SR 3.3.8.1.3	4.3.3.1 for Table 4.3.3.1-1 Trip Functions D.1, D.2, E.1, and E.2	10
L.1	Deletes trip setpoints and all references to these setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.3, 3.3.3 Action a, Table 3.3.3-2	1
L.2	The ITS only requires two Division 1, 2, and 3 Loss of Voltage channels and Degraded Voltage channels per division to be OPERABLE, versus three as required by the CTS.	Table 3.3.8.1-1 Functions 1.a, 1.c, 2.a, and 2.c	Table 3.3.3-1 Action 39 and Trip Functions D.1, D.2, E.1, and E.2	1
L.3	CTS Actions allow operation with a channel tripped only until the next performance of a CHANNEL FUNCTIONAL TEST. This limitation is not specifically in the ITS since it exists inherently as a result of the CHANNEL FUNCTIONAL TEST requirement.	N/A	Table 3.3.3-1 Action 39	6 5
L.4	ITS provides an ACTION to require declaring the DG inoperable and taking the appropriate actions in the associated DG Specification if a channel is not tripped within 1 hour. CTS requires a CTS 3.0.3 entry if the channel is not tripped.	3.3.8.1 ACTION B	Table 3.3.3-1 Action 39	5
L.5	Deletes the Degraded Voltage Function Alarm since it does not necessarily relate to the Operability of the Instrumentation.	N/A	Table 3.3.3-2 footnote **	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.6	Deletes the CHANNEL CHECK of the 4.16 kV Emergency Bus Undervoltage - Loss of Voltage and Degraded Voltage Functions, since there is no read-out indication provided that can be used to compare these devices to the indications of other similar devices measuring the same parameter.	N/A	4.3.3.1 for Table 4.3.3.1-1 Trip Functions D.1, D.2, E.1, and E.2	3
L.7	Adds a Note to allow a channel to be inoperable for up to 2 hours status solely for performance of required Surveillances provided the associated Function maintains initiation capability for two DGs and associated 4.16 kV emergency buses.	3.3.8.1 Surveillance Requirements Note 2	N/A	6 &
L.8	Revises the setpoints for CTS Table 3.3.3-2 Trip Functions D.1.a, D.1.b, D.2.b, D.2.c, E.1.a, E.1.b, and E.2.b to reflect Allowable Values.	Table 3.3.8.1-1 Functions 1.a, 1.b, 1.d, 1.e, 2.a, 2.b, 2.d	Table 3.3.3-2 Trip Functions D.1.a, D.1.b, D.2.b, D.2.c, E.1.a, E.1.b, and E.2.b	1
3.3.8.2, RPS Electric Power Monitoring-Logic				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test of the RPS Electric Power Monitoring Instrumentation.	SR 3.3.8.2.3	4.8.4.4.b	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION of the RPS Electric Power Monitoring System.	SR 3.3.8.2.2	4.8.4.4.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DELETE ITS 3.10 REFERENCES OR ADD TEXT REGARDING ITS 3.10 BACK INTO DOC SUMMARY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	For the RPS logic bus EPAs, changes the Applicability from at all times to only include MODES 1, 2, and 3 and those MODES or Conditions other than MODES 1, 2, and 3 when the RPS, RHR SDC isolation, secondary containment isolation, or CREF System initiation functions (which are all the Technical Specification required equipment powered from the RPS logic buses) are required.	3.3.8.2 Applicability, ~~3.10.1, 3.10.4~~	3.8.4.4 Applicability	2
L.2	Extends the allowed out of service time for two inoperable assemblies from 30 minutes to 1 hour to provide sufficient time for the plant personnel to take corrective actions.	3.3.8.2 Required Action B.1	3.8.4.4 Action b	6
L.3	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other RPS electric power monitoring assembly for the associated RPS logic bus maintains trip capability.	3.3.8.2 Surveillance Requirements Note	N/A	6 P
L.4	Overvoltage and undervoltage trip setpoints are replaced with Allowable Values.	SR 3.3.8.2.2	4.8.4.4.b.1 and 2	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DELETE ITS 3.10 REFERENCES OR ADD TEXT REGARDING ITS 3.10 BACK INTO DOC SUMMARY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	ITS changes the RPS scram solenoid bus EPAs Applicability to only include those MODES or Conditions when the RPS scram solenoids are required (i.e., MODE 1 and 2, and MODE 5 with any control withdrawn from a core cell containing one or more fuel assemblies) ~~from at all times~~ FROM AT ALL TIMES	3.3.8.3 Applicability; ~~3.10.3, 3.10.4~~	3.8.4.5 Applicability	2
L.2	Extends the allowed out of service time for two inoperable assemblies from 30 minutes to 1 hour to provide sufficient time for the plant personnel to take corrective actions.	3.3.8.3 Required Action B.1	3.8.4.5 Action b	6
L.3	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other RPS electric power monitoring assembly for the associated RPS scram solenoid bus maintains trip capability.	3.3.8.3 Surveillance Requirements Note	N/A	6 &
L.4	~~In the Surveillance Requirements, replaces the~~ overvoltage and undervoltage trip setpoints with the Allowable Values. ARE REPLACED	SR 3.3.8.3.2	4.8.4.5.b.1 and 2	1
L.5	The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG Set or alternate power supply is not removed from service (which de-energizes the associated RPS scram solenoid bus). Thus, CTS 3.0.3 is required to be entered. However, since CTS 3.0.3 is not applicable in Mode 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and an Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In place of these two requirements, the ITS provides a new ACTION if the Required Actions of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. The ITS requires action to be initiated to fully insert control rods in cells containing one or more fuel assemblies.	3.3.8.3 ACTION D	N/A	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.1, Recirculation Loops Operating			
L.1	CTS 4.4.1.1.4 requires a baseline APRM and LPRM neutron flux noise value to be determined within 2 hours after entering the region for which monitoring is required. This requirement is extended to 8 hours in the ITS, in the form of requiring the APRM and LPRM noise levels to be verified ≤3 times baseline noise levels within 8 hours of entering the restricted zone.	3.4.1 Required Action B.1	4.4.1.1.4	6
L.2	Replacement of the required action to shut down one of the recirculation loops when the flow mismatch is not within limits with a requirement to declare the loop with the low flow "not in operation."	3.4.1 ACTION E	3.4.1.3 Action b	5
L.3	CTS 4.4.1.3 requires the jet pump loop flow mismatch to be verified within the limits once per 24 hours when in MODES 1 and 2 during two recirculation loop operation. Since CTS 4.4.1.3 cannot be performed prior to its Applicability (as required by CTS 4.0.4) if shifting from single loop to two loop operation while in MODE 1 or 2, a Note is added providing an allowance for time to initiate the Frequency to avoid intentional entry into the Actions each time the second recirculation pump is started.	SR 3.4.1.2 Note	N/A	3
	3.4.2, Flow Control Valves (FCVs)			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillances: Verification each FCV fails "as is" on loss of hydraulic pressure at the hydraulic unit, and verification that the average rate of FCV movement is within the specified limit (≤ 11%/sec).	SR 3.4.~~1.2~~ 2.1, SR 3.4.2.2	4.4.1.1.3.a, 4.4.1.1.3.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.3, Jet Pumps			
L.1	Adds a Note to allow a 4-hour delay in performance of the jet pump surveillance after the associated recirculation loop is restored to operation since these checks can only be performed when the loop is in operation.	SR 3.4.3.1 Note 1	N/A	3
	3.4.4, Safety/Relief Valves (S/RVs)			
L.1	Increases the allowed SRV lift setpoint tolerance from 1% to 3%. When the setpoints are verified, they are still required to be reset to 1%.	SR 3.4.4.1	3.4.2	3
L.2	Deletes CTS 3.4.2 Action b which requires a stuck open S/RV to be closed within 5 minutes, provided the suppression pool temperature is < 110°F; otherwise, the reactor mode switch must be placed in shutdown. The Required Actions for stuck open S/RVs are implicit in CTS 3.6.2.1 Action b and ITS 3.6.2.1.	N/A	3.4.2 Action b	4
	3.4.5, RCS Operational Leakage			
L.1	Changes Surveillance Frequency for CTS 4.4.3.2.1.b from 8 hours to 12 hours to coincide with the 12 hour operating shift.	SR 3.4.5.1.	4.4.3.2.1.b	3
L.2	Deletion of the reactor vessel head flange leak detection instrumentation and the supporting Surveillance.	N/A	4.4.3.2.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.6, RCS Pressure Isolation Valve (PIV) Leakage			
L.1	Currently, PIV leakage limits of CTS 3.4.3.2 are required to be met in MODES 1, 2, and 3. A MODE 3 exception is included in the APPLICABILITY of ITS 3.4.6 for valves in the shutdown cooling flow path when needed for the shutdown cooling function.	3.4.6	3.4.3.2	2
L.2	Revises the requirement to isolate the high-pressure portion of the affected system from the low-pressure portion within 4 hours using at least two closed valves to requiring one valve to be closed within 4 hours and a second valve to be closed within 72 hours.	3.4.6 Required Actions A.1 and A.2	3.4.3.2 Action c	6
L.3	Deletes the explicit post maintenance PIV leak check Surveillance Requirement (i.e., PIVs shall be demonstrated OPERABLE by leak testing before returning the valve to service following maintenance, repair, or replacement work on the valve) as it is redundant to SR 3.0.1 and the definition of OPERABILITY.	N/A	4.4.3.2.2.b	3
	3.4.7, RCS Leakage Detection Instrumentation			
LE.1	~~Relocation~~ RELAXATION of Surveillance Frequency from 18 to 24 months for performing the Channel Calibrations of the reactor coolant system leakage detection systems.	SR 3.4.7.4	4.4.3.1.a, 4.4.3.1.b	10
L.1	CTS 3.4.3.1 requires the primary containment atmospheric particulate and gaseous radioactivity monitoring systems, and the drywell floor and equipment drain tank fill rate monitoring systems. The required systems are rearranged in ITS 3.4.7 to require one method which can quantify the unidentified LEAKAGE and a diverse detection method which provides only indication of increased leakage. Associated Actions and Surveillance Requirements are revised accordingly.	LCO 3.4.7, 3.4.7 ACTIONS A, B, and C, SR 3.4.7.1, SR 3.4.7.2, SR 3.4.7.~~3~~ 4 SR 3.4.7.~~4~~ 5	LCO 3.4.3.1.a, b, and d, 3.4.3.1 Actions a, b, and d, 4.4.3.1.a, 4.4.3.1.b	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rete test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specifications.	N/A	4.6.2.1.e.1	9
	3.6.1.2, Primary Containment Air Locks			
L.1	Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases.	3.6.1.2 ACTIONS Note 1	~~3.6.1.3 Actions~~ N/A	4
L.2	Adds ITS Required Action Note to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for a limited period of time (i.e., 7 days) if both air locks are inoperable. Also adds ITS Required Action Note to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) when an interlock mechanism is inoperable. The allowance has strict administrative controls, detailed in the Bases.	3.6.1.2 Required Actions A and B Note 2	~~3.6.1.3 Actions~~ N/A	4
L.3	In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and allows 1 hour to complete the verification in the ITS.	3.6.1.2 Required Actions A.1 and C.2	3.6.1.3 Actions a.1 and c	6
L.4	Adds ITS Required Action Note to allow administrative means to be used to verify locked closed OPERABLE air lock doors in high radiation areas or areas with limited access due to inerting.	3.6.1.2 Required Actions A.3 and B.3 Note	~~3.6.1.3 Actions~~ N/A	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices.	3.6.1.3 ACTIONS A, B, C, and E	3.6.3 Action a, 3.4.7 Action a, 4.6.1.1.b	4
L.3	In the event two or more valves in a penetration are inoperable, CTS 3.6.3 Action a, which requires maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable.	3.6.1.3 ACTION B	3.6.3 Action a	6
L.4	Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument.	3.6.1.3 Required Action C.1	3.6.3 Action b	6
L.5	Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.6.3 LCO Footnote ** and Action Footnote *.	3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2 and SR 3.6.1.3.3 Note 2	3.6.3 Footnote (**) 3.6.3 Action Footnote *	1, 4
L.6	Deletes CTS 4.6.3.1 since explicit post maintenance Surveillance Requirements are not required.	N/A	4.6.3.1	3
L.7	Not used.			
L.8	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillances that verify that each PCIV actuates on an automatic isolation "test" signal.	SR 3.6.1.3.8	4.6.3.2	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.9	Deletes the requirement in CTS 4.6.3.4 that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated instrument line break signal.	SR 3.6.1.3.9	4.6.3.4	3
L.10	The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	SR 3.6.1.3.2, SR 3.6.1.3.3	4.6.1.1.b, including footnote b	3
L.11	Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means.	3.6.1.3 Note 1 to ~~ITS~~ Required Actions A.2 and C.2, SR 3.6.1.3.2, and SR 3.6.1.3.3	4.6.1.1.b	3, 4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.12	Concerning primary containment leakage for the conditions of 1) the combined leakage rate for valves in hydrostatically tested lines exceeding 1 gpm times the total number of such valves or 2) the leakage rate for any valve that is part of a potential bypass leakage pathway exceeding its limit, CTS 3.6.1.2 Action (Restore) c and d requires restoration of the leakage to within limits, and the restoration time of the CTS 3.6.1.1 Action, 1 hour, is applicable. In addition, if a purge supply valve with resilient seals is the reason the leakage is not within limits, CTS 3.6.1.7 Action b is required to be entered, and provides 24 hours to restore the leakage to within limits (however, since CTS 3.6.1.1 Action is more limiting, it will govern the total time to restore leakage). The times to restore the leakage have been modified in the ITS to be 4 hours for hydrostatically tested line leakage not on a closed system and for secondary containment bypass leakage paths (which includes purge supply valve leakage) excluding MSIVs, 8 hours for MSIVs, and 72 hours for valves in hydrostatically tested lines on a closed system. The ITS will also require immediately taking the ACTIONS of ITS 3.6.1.1 (which reduces the time allowed to restore the leakage to within limits to 1 hour) if leakage results in the overall primary containment leakage rate acceptance criteria being exceeded.	3.6.1.3 Required Action D.1 and ACTIONS Note 4	3.6.1.2 Action (Restore) c and d, 3.6.1.7 Action b	6
L.13	Deletes the details relating to the Line Description and Termination Region for the potential bypass leakage paths in CTS Table 3.6.1.2-1.	N/A	Table 3.6.1.2-1	1

(BY ISOLATING THE PENETRATION WITH A DEVICE THAT MEETS THE APPLICABLE LEAKAGE LIMITS)

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.14	NOT USED ~~The CTS states that for certain valves in potential bypass leakage paths, the leakage through each penetration shall be that of the valve with the highest rate in that penetration. The ITS will allow the leakage through the penetration to be the actual pathway leakage, provided the penetration is isolated by one closed and de-activated automatic valve, closed manual valve, or blind flange.~~	~~N/A Table 3.6.1.3-1 footnote (a)~~	~~N/A Table 3.6.1.2-1 footnote t~~	~~N/A 1~~
L.15	The CTS limits the time the 12 inch and 14 inch purge valves can be open to 135 hours per 365 days for PURGING OR VENTING. The CTS also provides an allowance that the purge valves can be open for an unlimited amount of time for primary containment pressure control, provided 2GTS*AOV101 is closed (which isolates the 20 inch line to the SGT System) and the 2 inch bypass line is the only flow path to the SGT System. The ITS does not include the time limitations, and replaces them with specific criteria for opening.	SR 3.6.1.3.1 Note	3.6.1.7.a, including footnote *	1
L.16	Deletes the requirement to verify the primary containment purge valves with resilient seals are blocked to limit their opening to 60° or 70°, as applicable. These blocking devices are permanently installed devices located on the actuator and will require a design change to increase or decrease the current limits.	N/A	3.6.1.7.b, 4.6.1.7.1	1, 3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	NOT USED SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.17	The requirement to restore the leakage rate of the inoperable containment purge valve(s) with resilient seals has been changed to allow the isolation of the affected penetration and to continue operations without a requirement to restore the associated valves. The allowance provided must use at least one isolation barrier that cannot be adversely affected by a single failure such as a closed and de-activated automatic valve closed, manual valve, or blind flange. This flexibility is provided as long as this isolation is verified every 31 days and the purge valve leak rate test is performed every 92 days if a purge exhaust valve with a resilient seal is used to perform the isolation.	~~N/A 3.6.1.3 Required Actions B.1, B.2, and B.3~~	~~N/A 3.6.1.7 Action b~~	~~N/A~~ 4
L.18	Relaxation of the Surveillance Frequency of the leakage rate test of primary containment purge valves with resilient seals from 92 days to 184 days and once within 92 days after opening the valve.	SR 3.6.1.3.6	4.6.1.7.2	3
L.19	The CTS requires suspension of PURGING and VENTING (except when the containment purge full flow line to the SGT System is isolated) within 30 minutes when one SGT subsystem is inoperable and also requires suspension of PURGING, VENTING, or pressure control (with no time specified to suspend the operations) when both SGT subsystems are inoperable. In the ITS, the Note to proposed SR 3.6.1.3.1, which allows the purge valves to be open under certain conditions, will include the SGT requirements of CTS 3.6.5.3 Actions a.1 (including Footnote **) and b.1. If the purge valves are open when not allowed by the Note, ITS 3.6.1.3 ACTION B will be required to be entered as the purge valves would be considered inoperable. ACTION B allows 1 hour to isolate the penetration.	SR 3.6.1.3.1 Note, 3.6.1.3 ACTION B	3.6.5.3 Action a.1 including Footnote **, 3.6.5.3 Action b.1	4, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.1.4, Drywell and Suppression Chamber Pressure				
None	None	None	None	None
3.6.1.5, Drywell Air Temperature				
None	None	None	None	None
3.6.1.6, RHR Drywell Spray				
L.1	Deletes the requirement to circulate drywell spray water through the heat exchangers since cooling the drywell spray water is unnecessary.	N/A	3.6.2.2.b	1
L.2	Relaxation of the Surveillance Frequency from 5 years to 10 years for performance of the drywell spray nozzle obstruction Surveillance.	SR 3.6.1.6	4.6.2.2.c	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Deletes the suppression pool temperature instrumentation specified in CTS 3.6.2.1 Actions c and d, and CTS 4.6.2.1.c, since the BWR Standard Technical Specifications do not specify indication-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	3.6.2.1 Actions c and d, and 4.6.2.1.c	1, 3, 4
L.3	When the suppression pool is > 90°F but ≤ 110°F, CTS requires 30 minute suppression pool temperature verification and hourly power level verification. When suppression pool temperature is > 90°F and ≤ 110°F, and power is > 1% RTP, ITS requires verification of suppression pool temperature once per hour. If < 1% RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient. Knowledge of current power level is an inherent requirement for the operator at all times and is not explicitly stated as a requirement.	3.6.2.1 Required Action A.1, SR 3.6.2.1.1 D.2,	4.6.2.1.b.3, 4.6.2.1.b.2.b)	3
3.6.2.2, Suppression Pool Water Level				
L.1	Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits.	3.6.2.2 Required Action A.1	3.6.2.1 Action a, 3.5.3 Action a	6
3.6.2.3, RHR Suppression Pool Cooling				
L.1	Extends from 72 hours to 7 days the restoration time when one subsystem is inoperable. In addition, a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable is provided. Currently, no time is provided; CTS 3.6.2.3 Action b requires a unit shutdown.	3.6.2.3 ACTIONS A and B	3.6.2.3 Actions a and b	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.4.1, Secondary Containment			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing CTS 4.6.5.1.c.1 and 4.6.5.1.c.2, which ensure that the Secondary Containment is OPERABLE to support the drawdown analysis.	SR 3.6.4.1.4, SR 3.6.4.1.5	4.6.5.1.c.1, 4.6.5.1.c.2	10
L.1	The requirement to verify each standby gas treatment subsystem will drawdown the secondary containment on an 18-month frequency has been changed to test only one SGT subsystem every 24 months (see DOC LD.1 above for the change from 18 months to 24 months), but the two SGT subsystems must be staggered.	SR 3.6.4.1.4	4.6.5.1.c.1	~~10~~ 3
	3.6.4.2, Secondary Containment Isolation Valves			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal.	SR 3.6.4.2.3	4.6.5.2.b	10
L.1	Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves.	3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2	N/A	1
L.2	In the event both valves in a penetration are inoperable in an open penetration, the CTS 3.6.5.2 Action, which requires maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable.	3.6.4.2 ACTION B	3.6.5.2 Action	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes CTS 4.6.5.2.a since explicit post maintenance testing Surveillance Requirements are not required.	N/A	4.6.5.2.a	3
L.4	The requirement to perform CTS 4.6.5.2.b during COLD SHUTDOWN or REFUELING is not included in the ITS. The control of the plant conditions appropriate to perform the test is an issue for procedures and scheduling.	N/A	4.6.5.2.b	3
L.5	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each SCIV actuates on an automatic isolation "test" signal.	SR 3.6.4.2.3	4.6.5.2.b	3
L.6	Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative controls.	3.6.4.2 Required Action A.2 Note, SR 3.6.4.2.1 Note 1	4.6.5.1.b.3	3
L.7	The requirements related to verification of the position of secondary containment isolation manual valves and blind flanges are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed or otherwise secured in the correct position.	SR 3.6.4.2.1	4.6.5.1 b	3
3.6.4.3, Standby Gas Treatment System				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the verification that each SGT subsystem actuates on an actual or simulated initiation signal and for performing the verification that each SGT decay heat removal air inlet valve can be opened.	SR 3.6.4.3.3, SR 3.6.4.3.4	4.6.5.3.d.2, 4.6.5.3.d.3	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	ITS 3.7.2 ACTION A allows a 7 day restoration time when both CREF subsystems are inoperable, provided the CREF System safety function is maintained. ITS 3.7.2 ACTION D will require entry into 3.0.3 (if in MODE 1, 2, or 3) and ITS 3.7.2 ACTION E will require the unit to suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), if both CREF subsystems are inoperable and CREF System safety function is not maintained. Also, CTS 3.7.3 Action b.1 has been revised to require the Operable components of CREF subsystem(s) equivalent to a single CREF subsystem to be placed in operation in lieu of placing the Operable subsystem in operation.	3.7.2 ACTIONS A, D, and E, ~~3.7.2 Required Action~~ C.1	3.7.3 Actions, ~~3.7.3 Action b.1~~	4,6
L.2	When one CREF subsystem is inoperable during movement of irradiated fuel in the secondary containment, Core Alterations, and OPDRVs, the CTS Action requires the CREF subsystem to be restored in 7 days, or the Operable CREF subsystem must be placed and maintained in the emergency pressurization mode of operation. It further exempts the requirements of LCO 3.0.4 provided one Operable CREF subsystem is in operation. This allowance precludes starting of the above listed evolutions when a CREF subsystem is inoperable unless the Operable subsystem is in operation; the evolutions cannot be started using the 7 day restoration time provided in the Action. This requirement has been deleted in ITS 3.7.2. This will allow the evolutions to be started and continued for up to 7 days before requiring the Operable CREF subsystem to be placed in operation.	N/A	3.7.3 Action b.1	4
L.3	Deletes the CREF System staggered testing requirements for the 31 day operation test.	N/A	4.7.3.b	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the verification every 12 hours that the control room envelope air temperature is ≤ 90°F; SR 3.7.3.1 ensures the Control Room Envelope AC System remains OPERABLE.	N/A	4.7.3.a	3
L.4	ITS 3.7.3 ACTION A allows a 30 day restoration time (see Discussion of Change L.1 in this section for discussion of the change from 7 days to 30 days) when both control room envelope AC subsystems are inoperable, provided the Control Room Envelope AC System safety function is maintained. ITS 3.7.3 ACTION D will require entry into 3.0.3 (if in MODE 1, 2, or 3) and ITS 3.7.3 ACTION E will require the unit to suspend Core Alterations, handling irradiated fuel, and OPDRVs (if performing one of these evolutions), if both control room envelope AC subsystems are inoperable and Control Room Envelope AC System safety function is not maintained. Also, CTS 3.7.3 Action b.1 (ITS 3.7.3 Required Action C.1) has been revised to require the Operable components of control room envelope AC subsystem(s) equivalent to a single control room envelope AC subsystem to be placed in operation in lieu of placing the Operable subsystem in operation.	3.7.3 ACTIONS A, D, and E, ~~3.7.3 Required Action~~ C.1	3.7.3 Actions, ~~3.7.3 Action b.1~~	4,6
	3.7.4, Main Condenser Offgas			
L.1	Changes the Applicability from "During offgas system operation" to "MODE 1" and "MODES 2 and 3 with any steam line not isolated and steam jet air ejector (SJAE) in operation."	LCO 3.7.4	LCO 3.11.2.7	2
	3.7.5, Main Turbine Bypass System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for performing the system functional test and the TURBINE BYPASS SYSTEM RESPONSE TIME test.	SR 3.7.5.1, SR 3.7.5.2	4.7.7.a, 4.7.7.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.1, AC Sources Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following DG related surveillances: Single load reject test; Full load reject test; LOOP test; LOCA test; Automatic trip bypass test; 24 hour run test; Hot restart test; DG synchronization shutdown test; Test mode override test; Load block interval test; and LOCA/LOOP test.	SR 3.8.1.7, SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10,; SR 3.8.1.17, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.13	4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.8, 4.8.1.1.2.e.10, 4.8.1.1.2.e.11, 4.8.1.1.2.e.12, 4.8.1.1.2.f	10
L.1	In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "6 days from discovery of failure to meet LCO" in ITS 3.8.1 Required Actions A.3 and B.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss.	3.8.1 Required Actions A.3 and B.4	3.8.1.1 Actions a, b, c, f, and g	6
L.2	Deletes the requirement to verify the cause of the inoperable DG does not impact the other DG.	N/A	3.8.1.1 Actions b, c, d, and g footnote *	4
L.3	CTS 3.8.1.1 Actions c and g require a verification by evaluation or test within 8 hours that the cause of a DG inoperability does not affect the remaining DGS. ITS 3.8.1 Required Actions B.3.1 and B.3.2 will continue to require this verification, but will allow 24 hours to perform the verification.	3.8.1 Required Actions B.3.1 and B.3.2	3.8.1.1 Actions c and g	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	The Completion Time to verify that required systems, subsystems, trains, components, and devices powered from the redundant DG(s) are OPERABLE has been extended from 2 hours to 4 hours.	3.8.1 Required Action B.2	3.8.1.1 Action e	6
L.5	Deletes STAGGERED TEST BASIS requirement from the CTS 4.8.1.1.2.a normal monthly DG Surveillances.	N/A	4.8.1.1.2.a	3
L.6	The Surveillance Frequency for CTS 4.8.1.1.2.a.1, the day tank level check and CTS 4.8.1.1.2.a.3, the fuel oil transfer pump test, has been changed from "frequency specified in Table 4.8.1.1.2-1" (the DG Test Schedule Table) to "31 days" for CTS 4.8.1.1.2.a.1 and "92 days" for CTS 4.8.1.1.2.a.3.	SR 3.8.1.4, SR 3.8.1.6	4.8.1.1.2.a.1, 4.8.1.1.2.a.3	3
L.7	CTS 4.8.1.1.2.a.4.a) and 4.8.1.1.2.f require the Division 1 and 2 DGs to accelerate to 600 rpm in ≤ 10 seconds. For these DGs, 600 rpm is equivalent to a frequency of 60 Hz. The CTS requirements listed above further state that the generator frequency must be 60 ± 3.0 Hz in ≤ 10 seconds. In addition, once steady state is achieved, the frequency is required to be maintained at 60 ± 1.2 Hz. The ITS will require the minimum frequency to be 58.8 Hz, as shown in proposed SRs 3.8.1.2 and 3.8.1.13, since the accident analysis requires the DG to be capable of being loaded within 10 seconds (can be accomplished at 58.8 Hz). CTS 4.8.1.1.2.g also requires the Division 1 and 2 DGs to accelerate simultaneously to 600 rpm in ≤ 10 seconds. No additional frequency requirement, similar to the two CTS Surveillances described above, are provided. Proposed SR 3.8.1.18 provides a frequency requirement of 58.8 Hz.	SR 3.8.1.2, SR 3.8.1.13, SR 3.8.1.18	4.8.1.1.2.a.4.a), 4.8.1.1.2.f, 4.8.1.1.2.g	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.8	For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained.	SR 3.8.1.2, SR 3.8.1.10, SR 3.8.1.13	4.8.1.1.2.a.4, 4.8.1.1.2.e.5, 4.8.1.1.2.f	3
L.9	The load requirements of CTS 4.8.1.1.2.a.5 and CTS 4.8.1.1.2.e.8 (the 22-hour load requirements only) have been relaxed to ensure that the DG's continuous rating is not required to be exceeded on a routine basis. The new load range in proposed SR 3.8.1.3 and SR 3.8.1.12 is 90%-100% of the continuous rating for the DGS (3960 kW to 4400 kW for the Division 1 and 2 DGs and 2340 kW to 2600 KW for the Division 3 DG). The 2-hour load requirements of Surveillance 4.8.1.1.2.e.8 have also been relaxed. The new load range in proposed SR 3.8.1.12 is 105%-110% of the continuous rating for the DGs (4620 kW to 4840 kW for the Division 1 and 2 DGs and 2730 kW to 2860 kW for the Division 3 DG). The load requirements of CTS 4.8.1.1.2.f have also been changed in proposed SR 3.8.1.13 Note 1 to conform to this load value (the lower limits of 3960 kW for the Division 1 and 2 DGs and 2340 kW for the Division 3 DG). In addition, a Note has been added to CTS 4.8.1.1.2.a.5 (proposed SR 3.8.1.3 Note 2) stating that momentary transients outside the load range do not invalidate the Surveillance.	SR 3.8.1.3 including Note 2, SR 3.8.1.12, SR 3.8.1.13 Note 1	4.8.1.1.2.a.5, 4.8.1.1.2.e.8, 4.8.1.1.2.f	3
L.10	Deletes the CTS 4.8.1.1.2.a.5 90-second limitation on the time to reach full DG load from a manual synchronization, required to be performed every 184 days as stated in footnote * to CTS 4.8.1.1.2.a.5, as well as the restriction to warming up the DG prior to loading.	SR 3.8.1.3	4.8.1.1.2.a.5 including footnote *	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.11	The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification OPERABILITY requirements and is to be removed from the Technical Specifications.	LCO 3.8.1	4.8.1.1.2.a.6	3
L.12	CTS 4.8.1.1.2.b.1 requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each occasion when the diesel is operated for more than 1 hour." Proposed SR 3.8.1.5 only requires the check every 31 days; the frequency of "after each occasion when the diesel is operated for more than 1 hour" has been deleted, since water condensation within the fuel oil tanks is a time dependent process, not a process dependent on the transfer of fuel oil during DG operation.	3.8.1.5 SR	4.8.1.1.2.b.1	3
L.13	CTS 4.8.1.1.2.e footnote * and CTS 4.8.1.1.2.f require the diesel to be operated with a load in accordance with the manufacturer's recommendations any time the diesel is started to perform the surveillances of CTS 4.8.1.1.2.e and CTS 4.8.1.1.2.f. The ITS does not include this requirement, since it is essentially a preventative maintenance type of requirement.	N/A	4.8.1.1.2.e footnote *, 4.8.1.1.2.f	3
L.14	The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, and 4.8.1.1.2.e.11 (proposed SRs 3.8.1.9, 3.8.1.10, 3.8.1.17, 3.8.1.11, and 3.8.1.15, respectively) for use in verifying the proper response of the DG, since the DG cannot discriminate between "actual" or "simulated" signals.	SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.17, SR 3.8.1.11, SR 3.8.1.15	4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.11	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.15	CTS 4.8.1.1.2.e.4.a)2) and 4.8.1.1.2.e.4.b)2) require the DGS to start and energize the emergency buses within 13 seconds of a loss of offsite power signal. Proposed SR 3.8.1.9 will allow the DGs to start and energize the emergency buses within 13.20 seconds, which is the summation of the current DG start time of 10 seconds and the proposed DG loss of voltage time delay Allowable Value and is also the time assumed in the accident analysis for the DG to start when only a loss of voltage occurs.	SR 3.8.1.9	4.8.1.1.2.e.4.a)2), 4.8.1.1.2.e.4.b)2)	3
L.16	The manner in which the DG is started for CTS 4.8.1.1.2.e.8 (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS.	N/A	4.8.1.1.2.e.8	3
L.17	Deletes CTS 4.8.1.1.2.e.13, which verifies the DG lockout features prevent DG starting only when required.	N/A	4.8.1.1.2.e.13	3
L.18	Adds a Note to CTS 4.8.1.1.2.f (Hot restart test) and 4.8.1.1.2.g (DG simultaneous start test) to allow a prelube prior to starting the DG.	SR 3.8.1.13, SR 3.8.1.18	4.8.1.1.2.f, 4.8.1.1.2.g	3
L.19	Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.8.1.1.2.g (i.e., after any modifications which could affect DG interdependence).	N/A	4.8.1.1.2.g	3
L.20	The requirement to perform CTS 4.8.1.1.2.g (to simultaneously start all three DGs) during shutdown has not been included in the ITS.	N/A	4.8.1.1.2.g	3
L.21	Deletes CTS 4.8.1.1.3, which requires that all DG failures be reported to the NRC in a special report pursuant to CTS 6.9.2.	N/A	4.8.1.1.3	9

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.22	If an offsite circuit is inoperable only due to its inability to provide power to the Division 3 electrical power distribution subsystem, CTS 3.8.1.1 Action a would require a unit shutdown if the offsite circuit is not restored to OPERABLE status within 72 hours. ITS 3.8.1 provides an Applicability Note which, in the event the HPCS System is inoperable, allows the Division 3 offsite circuits to not be required to be OPERABLE. Thus, at the end of the current 72 hour restoration time, the ITS Note would allow HPCS to be declared inoperable, and the ACTIONS in ITS 3.5.1 would be taken for an inoperable HPCS System. The ACTIONS in ITS 3.5.1 allow 14 days to restore HPCS to OPERABLE status. The overall effect of this change is to allow an additional 14 days to restore the circuit to OPERABLE status, since that is the only way to restore the HPCS System to OPERABLE status under this condition.	3.8.1 Applicability Note	N/A	1
	3.8.2, AC Sources Shutdown			
L.1	CTS 3.8.1.2.b requires the Division 3 DG to be OPERABLE when the HPCS System is required to be OPERABLE. ITS LCO 3.8.2.c will allow a qualified offsite circuit, other than the circuit required to provide power to Division 1 and 2, to substitute for the DG.	LCO 3.8.2.c	LCO 3.8.1.2.b	1

INSERT L.23 & L.24 (ATTACHED)

Insert (Table L, Section 3.8, 3.8.2)

L.23	The diesel generator accelerated test frequency requirements in CTS Table 4.8.1.1.2-1 and referenced in CTS 4.8.1.1.2.a are proposed to be deleted, leaving the ITS periodic Surveillance Frequency as 31 days in proposed SR 3.8.1.2 and SR 3.8.1.3. A plant procedure implements the requirements and responsibilities for tracking requirements and responsibilities for tracking emergency DG failures for the determination and reporting of reaching trigger values specified in NUMARC 87-00. These requirements are more restrictive than those specified in NUREG-1434, Rev. 1. In addition, Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Diesel Generators," allows Licensees to request removal from TS of provisions for accelerated testing. NMP2 also proposed to make the changes allowed by Generic Letter 94-01. NMP2 has already implemented a maintenance program for monitoring and maintaining emergency diesel generator performance in accordance with the provisions of the maintenance rule and consistent with the guidance of Regulatory Guide 1.160. Therefore, the requirements are not required to be in the ITS to provide adequate protection of the public health and safety and the allowances in Generic Letter 94-01 are acceptable.	SR 3.8.1.2, SR 3.8.1.3	Table 4.8.1.1.2-1, 4.8.1.1.2.a	3
L.24	CTS 4.8.1.1.2.e.12 requires verification that the interval between each load block is within ±10% of its design interval for Division 1 and 2 DGs. The SR is proposed to be changed in ITS SR 3.8.1.16 to delete the upper 10% limit, such that the interval between each load block is only required to be ≥ 90% of the design load interval. The purposes of the 10% load sequence time interval tolerance are to ensure that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated. The first purpose is met solely by the applying a lower limit and the second purpose is not related to the DG; it relates to the ability of the individual loads to perform their assumed functions. Thus, if a time delay was too long, while the individual load may be inoperable, the DG is not inoperable; the DG can still perform its intended function. Thus, the upper limit should not be considered as a operability requirement for the DG.	SR 3.8.1.16	4.8.1.1.2.8.12	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air			
L.1	The starting air requirements are currently presented as attributes of compliance with the DG LCO, via their presentation as Surveillances. This parameter, while supporting DG OPERABILITY, contains substantial margin in addition to the limits which would be absolutely necessary for DG OPERABILITY. Therefore, certain levels of degradation in air start receiver pressure are justified to extend the allowances for restoration (presented as ITS 3.8.3 ACTIONS E and F and ACTIONS Note). During the extended restoration periods for this parameter, the DG would still be capable of performing its intended function. ITS 3.8.3 ACTION E, which is entered on a per DG basis (as allowed by the ACTIONS NOTE), allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a one start capacity remains. ITS 3.8.3 ACTION F is provided to declare the DG inoperable if the previous ACTION is not met.	ITS 3.8.3 ACTIONS Note and ACTIONS E and F	3.8.1.1 Actions	6
L.2	The Surveillance Frequency of CTS 4.8.1.1.2.a has been changed from "frequency specified in Table 4.8.1.1.2-1" (the DG test schedule table) to "31 days."	SR 3.8.3.1	4.8.1.1.2.a	3
L.3	Deletes from CTS 4.8.1.1.2 the STAGGERED TEST BASIS requirements for diesel fuel oil level and starting air pressure verification.	N/A	4.8.1.1.2.a	3
L.4	Deletes ~~from CTS 4.8.1.1.2.h~~ the 10 year Surveillances to drain, remove sediment, and clean each fuel oil tank, and to perform a pressure test on the DG fuel oil system piping. However, the tests will be maintained in plant procedures and continued to be performed.	N/A	4.8.1.1.2.h	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	5.1, Responsibility			
L.1	CTS provides the title of the individual designated by the Plant Manager to approve modifications to structures, systems, and components, and approve proposed tests and experiments. ITS will not specify this individual, but will require the person to be designated by the plant manager.	5.1.1	6.5.2.3, 6.5.2.5	1
	5.2, Organization			
L.1	CTS provides a description of the individuals who can be designated by the Plant Manager to approve modifications to overtime requirements. ITS will not provide this description, but will require the person to be designated by the plant manager.	5.2.2.e	6.2.2.i.4	1
	5.3, Unit Staff Qualifications			
None	None	None	None	None
	5.4, Procedures			
None	None	None	None	None
	5.5, Programs and Manuals			
LD.1	Extends the Frequency from 18 to 24 months for the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident.	5.5.2.b	6.8.4.a.2	10 12

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
M.1	Adds a Surveillance to verify the automatic enabling of the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Control Oil Pressure—Low Functions at ≥ 30% RTP.	SR 3.3.1.1.15	N/A
	3.3.1.2, SRM Instrumentation		
M.1	Adds a restriction to determine signal-to-noise ratio and verify it is greater than or equal to 2:1 or 5:1, depending upon the count rate requirement.	SR 3.3.1.2.6,SR 3.3.1.2.5	4.3.7.6.b, 4.9.2.b
M.2	Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs or Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since it must be performed at all times, not just prior to control rod withdrawal, the phrase "before withdrawal of control rods" is not needed and has been deleted.	SR 3.3.1.2.4	4.3.7.6.c
M.3	Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry.	SR 3.3.1.2.7	N/A
	3.3.2.1, Control Rod Block Instrumentation		
M.1	Changes the Reactor Mode Switch Shutdown Position Applicability from MODES 3 and 4 to include any time the reactor mode switch is in the shutdown position. In addition, the associated action to be taken when a Reactor Mode Switch Shutdown Position channel is inoperable has been changed from placing the inoperable channel in the tripped condition within 12 hours to immediately suspending all control rod withdrawal and initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E	Tables 3.3.6-1 and 4.3.6-1 Function 6.a, Table 3.3.6-1 Action 62

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Adds a Note to ITS 3.3.4.2 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, since placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note will ensure the functional capability of the ATWS-RPT Instrumentation is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.2 Required Action A.2 Note	3.3.4.1 Actions b and c.1
M.2	Adds ~~two~~ A Surveillance Requirements to verify the low frequency motor generator trip portion of the Reactor Vessel Steam Dome Pressure—High Function is not bypassed for > 29 seconds ~~or~~ when Thermal Power is > 5% RTP.	SR 3.3.4.2.4, SR 3.3.4.2.5	N/A
3.3.5.1, ECCS Instrumentation			
M.1	Deletes CTS Table 3.3.3-1 footnote (d) and Table 4.3.3.1-1 footnote (b). The allowance in the notes specified that the Manual Initiation Function and the Drywell Pressure—High Function are not required to be OPERABLE with the indicated reactor water level on the wide range instruments greater than the Level 8 setpoint coincident with the reactor pressure less than 600 psig because of hot calibration/cold operation level error.	N/A	Table 3.3.3-1 footnote (d), Table 4.3.3.1-1 footnote (b)
M.2	Adds appropriate Required Actions for response to loss of the initiation capability of certain Functions for both divisions/trip systems.	3.3.5.1 Required Actions B.1, B.2, C.1, D.1, E.1, F.1, and G.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	For Functions that control the ECCS minimum flow valves, an inoperable channel must be restored, as provided in ITS 3.3.5.1 Required Action E.2; it is not allowed to be tripped as per CTS, since placing a channel in trip does not compensate for the inoperability and may be a less safe action to take. If it is not restored, then the associated subsystem must be declared inoperable and appropriate actions taken.	3.3.5.1 Required Action E.2	Table 3.3.3-1 Action 31 for Trip Functions A.1.c, A.1.j, B.1.h, C.1.f, and C.1.g
M.4	The following additional Allowable Values based upon the most recent setpoint calculations have been added: a) A maximum Allowable Value for the LPCS Pump Discharge Flow – Low (Bypass) has been provided to ensure the valves will close to provide assumed ECCS flow to the core; b) Minimum Allowable Values for the Differential Pressure–Low (LPCS and LPCI Permissive) have been provided to ensure the injection valves open to provide assumed ECCS flow to the core; and c) Maximum Allowable Values for the LPCS and RHR Pump Discharge Pressure–High have been provided to ensure the setpoint is below the shutoff head of the low pressure ECCS pumps. In addition, the Allowable Value for the HPCS Suppression Pool Water Level – High Function has been decreased to ensure the loads on the suppression pool will not exceed the design values if there is a blowdown of the reactor vessel pressure through the S/RVs.	Table 3.3.5.1-1 Functions 1.i, 1.j, 1.k, 2.i, 3.f, 4.d, 4.e, and 5.d	Table 3.3.3-2 Trip Functions A.1.c, A.1.d, A.1.e, A.2.d, A.2.e, B.1.c, B.2.d, and C.1.e
M.5	The Group 4 valve ~~initiation~~ TRIP Functions are now required to be Operable in MODES 4 and 5 when the associated LPCI subsystem is required to be Operable in addition to MODES 1, 2, and 3 (as per CTS), to ensure that flow is not inadvertently diverted, by the Group 4 valves being open, from the reactor vessel when the associated LPCI subsystem is initiated.	Table 3.3.5.1-1 Functions 1.a and 2.a	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 1.a.3
M.6	Adds a Function, ACTIONS, and Surveillances to provide requirements for the HPCS Pump Suction Pressure – Timer, to ensure proper operation of the logic.	Table 3.3.5.1-1 Function 3.e	N/A
A.9	Adds a Required Action to allow the HPCS pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Pump Suction Pressure–Low or Suppression Pool Water Level–High channel is inoperable.	3.3.5.1 Required Action D.2.2	3.3.3-1 Action 37

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.5.2, RCIC System Instrumentation		
M.1	Deletes CTS Table 3.3.5-1 footnote (d) and Table 4.3.5.1-1 footnote **. The allowance in the notes specified that the Manual Initiation Function is not required to be OPERABLE with the indicated reactor water level on the wide range instruments greater than the Level 8 setpoint coincident with the reactor pressure less than 600 psig because of hot calibration/cold operation level error.	N/A	Table 3.3.5-1 footnote (d), Table 4.3.5.1-1 footnote **
M.2	Adds appropriate Required Actions for response to loss of RCIC initiation capability of a Function.	3.3.5.2 Required Actions B.1 and D.1	N/A
M.3	Adds a Function, ACTIONS, and Surveillances to provide requirements for the RCIC Pump Suction Pressure – Timer, to ensure proper operation of the logic.	Table 3.3.5.2-1 Function 4	N/A
A.5	Adds a Required Action to allow the RCIC pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Pump Suction Pressure–Low channel is inoperable.	3.3.5.2 Required Action D.2.2	Table 3.3.5-1 Action 51
	3.3.6.1, Primary Containment Isolation Instrumentation		
M.1 REQUIRED	The Applicability for the Reactor Vessel Water Level – Low, Level 3 Function has been changed to require operability in MODES 4 and 5, with one of two trip systems operable when RHR System integrity is maintained in MODES 4 and 5. Appropriate limiting conditions for operation are provided for MODE 4 and 5 operations. ONLY	Table 3.3.6.1-1 Function 5.b and Note (d), 3.3.6.1 ACTION J	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 1.a.3 Applicability

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	The number of required channels for the Groups 3, 6, and 7 PCIV Manual Initiation Function has been increased from "1" per trip system to "4" per trip system. The design of the Groups 3, 6, and 7 logic is two switch and push buttons per trip system, with both being required to actuate a trip system. Currently, only one switch and push button per trip system is required. ← INSERT M.2 ATTACHED	Table 3.3.6.1-1 Functions 2.d and 4.h	Table 3.3.2-1 Trip Function 1.m
M.3	Two Functions, including appropriate ACTIONS, and Surveillance Requirements for a Timer Function are added: One Function delays initiation of the RHR/RCIC Steam Flow – High function and the other delays initiation of the RCIC Area Temperature – High function. ← 5	Table 3.3.6.1-1 Functions 3.j and 3(k) ← l	N/A
M.4	CTS states that Condenser Vacuum – Low is only required to be operable in Modes 2 and 3 when any main turbine stop valve is ≥ 90% open or when the key-locked condenser low vacuum bypass switch is in the normal position. ITS requires the Condenser Vacuum – Low Function to be operable in Modes 2 and 3 when any turbine stop valve is not closed. The current footnote essentially allows a stop valve to open up to 90% before requiring a MSIV isolation on low vacuum. The ITS will ensure that with a low vacuum condition, an MSIV isolation will occur if any turbine stop valve is not closed.	Table 3.3.6.1-1 Note (a)	Tables 3.3.2-1 and 4.3.2.1-1 footnote **
M.5	A time delay setting Allowable Value has been added for the SGT System Exhaust Radiation – High Function that ensures that the primary containment purge valves (group 9 valves) close on high SGT System exhaust radiation to keep offsite doses below 10 CFR 100 limits.	Table 3.3.6.1-1 for Function 2.c	N/A
3.3.6.2, Secondary Containment Isolation Instrumentation			
M.1	Adds a requirement to perform a Channel Check every 12 hours ~~is being added~~ for ITS 3.3.6.2 Functions 3 and 4, the Exhaust Radiation – High Functions.	3.3.6.2 Functions 3 and 4	Table 4.3.2.1-1 Trip Functions 3.a and 3.b

INSERT M.2

In addition, each of the switch and push button channels provides two inputs to the isolation logic; one input actuated by rotating a collar switch and a second input by depressing the inner push button. In the ITS format each input is considered a channel, thus the minimum channels for ITS is correctly specified as "4". Since this part of the change is only a difference in nomenclature, it is considered administrative.

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.7.1, CREF System Instrumentation		
M.1	Deletes the allowance that provides 4 hours to adjust an Allowable Value to within its limit prior to declaring the channel inoperable.	N/A	3.3.7.1 ACTION a
M.2	Requires the associated CREF subsystem to be declared inoperable within 1 hour after loss of initiation capability in both trip systems (i.e., when one main control room ventilation radiation monitor channel is inoperable in both trip systems). CTS allows both trip systems to have one inoperable channel for 24 hours.	3.3.7.1 Required Action B.1	Table 3.3.7.1-1 Action 74.a
M.3	The CTS requirement to restore both of the inoperable Main Control Room Ventilation Radiation Monitors in one trip system within 7 days has been changed in the ITS to require placing the channel in trip within 24 hours. In this same CTS Action, the 6 hour allowance to ensure proper operation of the CREF System in the filtration mode of operation has been changed to 1 hour in the ITS.	3.3.7.1 Required Actions B.2 and D.1	Table 3.3.7.1-1 Action 74.b
M.4	Adds more SRs for the Reactor Vessel Water Level— Low Low, Level 2 and Drywell Pressure — High Functions (Functions 1 and 2) and adds appropriate Allowable Values, consistent with the setpoint calculations. SR 3.3.7.1.1 requires performance of a Channel Check every 12 hours, SR 3.3.7.1.2 requires performance of a Channel Functional Test every 92 days, SR 3.3.7.1.3 requires the trip units to be calibrated every 92 days, and SR 3.3.7.1.4 requires performance of a Channel Calibration every 24 months.	Table 3.3.7.1-1, SRs 3.3.7.1.1, 3.3.7.1.2, 3.3.7.1.3, and 3.3.7.1.4	3/4.7.3
A.4	Deletes the allowance that states that the provisions of Specification 3.0.3 are not applicable, since the proposed Conditions and Required Actions of ITS 3.3.7.1 will adequately cover all potential conditions for inoperable equipment in the system. In addition, deletes the allowance that states that the provisions of Specification 3.0.4 are not applicable, since proposed LCO 3.0.4 provides this allowance.	N/A LCO 3.0.4	3.3.7.1 Action c

Not an M, move to 'A' TABLE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.7.2, Mechanical Vacuum Pump Isolation Instrumentation		
M.1	For main steam line radiation channel(s) that are inoperable due to a breaker that will not open or a valve that will not close, ITS 3.3.7.2 Required Action A.1 is added to specify restoration of the inoperable channel(s) and a Note is added to Required Action A.2 which states that placing a channel in trip is not applicable (since placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability).	3.3.7.2 Required Action A.1 and 3.3.7.2 Required Action A.2 Note	3.3.2 Actions b.1, c.1, and c.2.a
	3.3.8.1, Loss of Power Instrumentation		
M.1	The CTS requires the LOP instruments to be OPERABLE during MODES 4 and 5 only when the associated DG is required to be OPERABLE. In the ITS, the Applicability is being changed to be when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources— Shutdown," which in ITS 3.3.8.1 requires the LOP instrumentation to be OPERABLE not only during MODES 4 and 5, but also during movement of irradiated fuel assemblies in the secondary containment.	3.3.8.1 Applicability	Table 3.3.3-1 footnote **, Table 4.3.3.1-1 footnote †
M.2	Adds new Allowable Values for the LOP Functions. Maximum Allowable Values have been added for the Loss of Voltage and Degraded Voltage Functions to prevent inadvertent power supply transfer. Minimum Allowable Values have been added for the Loss of Voltage and Degraded Voltage Time Delay Relay Functions to provide time for the offsite power supply to recover to normal voltages prior to transferring to the DGs. In addition, the minimum Allowable Values for the Degraded Voltage Functions have been increased to ensure the power supply transfer occurs soon enough to provide adequate power to the associated loads, so that the loads can perform their safety functions.	Table 3.3.8.1-1 Functions 1.a, 1.b, 1.c, 1.d, 1.e., 2.a, 2.b, 2.c, and 2.d	Table 3.3.3-2 Trip Functions D.1.a, D.1.b, D.2.a, D.2.b, D.2.c, E.1.a, E.1.b, E.2.a, and E.2.b
M.3	Five timer functions, including appropriate ~~Actions and~~ Surveillance Requirements, are added which delay initiation of actuation circuitry to separate the Division I, II, and III emergency buses from offsite power for degraded grid or loss of voltage conditions.	Table 3.3.8.1-1 Functions 1.b, 1.d, 1.e, 2.b and 2.d	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
M.1	In moving the primary containment structural integrity requirements to ITS 3.6.1.1, the allowed Completion Time of 1 hour becomes applicable for structural conditions not in compliance with requirements. This allowed time to restore compliance before requiring a plant shutdown is less than the current 24 hours. This conservatively brings the allowed times for restoration for a loss of containment structural integrity into agreement with a loss of primary containment OPERABILITY.	3.6.1.1 Action A	3.6.1.4 Action
	3.6.1.2, Primary Containment Air Locks		
None	None	None	None
	3.6.1.3, Primary Containment Isolation Valves		
M.1	Adds a new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability 3.6.1.3 ACTION G	N/A
M.2	CTS 3.6.1.7 Action a requires the affected penetration to be isolated within 4 hours if the purge valve(s) are inoperable. The ITS will only allow 1 hour to isolate the affected penetration if both purge valves in a penetration are open for reasons other than those allowed in SR 3.6.1.3.1.	3.6.1.3 Required Action B.1	3.6.1.7 Action a
M.3	Adds a Surveillance Requirement that verifies the 12 and 14 inch purge valves are closed every 31 days (except when allowed to be open, as described in DOC L.14 for ITS 3.6.1.3).	SR 3.6.1.3.1	N/A

INSERT FOR M.4 ATTACHED

Insert (Table M, Section 3.6.1.3)

M.4	Adds Required Actions D.2 and E.2 to require the affected penetration flow path to be verified isolated a) every 31 days for isolation devices outside containment, and b) prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days, for isolation devices inside containment.	3.6.1.3 Required Actions D.2 and E.2	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.4, Drywell and Suppression Chamber Pressure			
None	None	None	None
3.6.1.5, Drywell Air Temperature			
None	None	None	None
3.6.1.6, RHR Drywell Spray			
A.2	Deletes the requirement that if unable to attain Cold Shutdown when two or more RHR subsystems are inoperable, then maintain reactor coolant temperature as low as practical by use of alternate heat removal methods, since it provides unnecessary duplication of the ACTIONS, contains no additional restrictions on the operation of the plant, and in fact, could be interpreted as a relaxation of the requirements to achieve MODE 4.	N/A	3.6.2.2 Action b, footnote*
M.1	There is no specific requirement to verify the required RHR pumps are OPERABLE with respect to the drywell spray mode. ~~However, it is implied by other CTS SR that the RHR pumps be verified OPERABLE for RHR drywell spray system OPERABILITY.~~ ITS SR 3.6.1.6.2 has been added to verify, by administrative means, that each required RHR pump is OPERABLE.	SR 3.6.1.6.2	~~4.6.2.2~~ N/A
	HOWEVER, IT IS IMPLIED THAT THE RHR PUMPS ARE REQUIRED TO BE OPERABLE.		
3.6.1.7, Suppression Chamber-to-Drywell Vacuum Breakers			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources Operating		
M.1	Adds two new Required Actions to cover the situation when an offsite circuit is inoperable concurrent with a "redundant required feature," limiting these situations to 24 hours when one offsite circuit is inoperable and 12 hours when both offsite circuits are inoperable.	3.8.1 Required Actions A.2 and C.1	N/A
M.2	Adds an additional Completion Time to require the inoperable offsite to be restored within 24 hours to cover the situation when the offsite circuit that is inoperable is supplying both LPCS (Division 1) and HPCS (Division 3).	3.8.1 Required Action A.3, second Completion Time	N/A
M.3	Adds a Required Action to cover the situation where the Division 3 DG is inoperable concurrent with a "redundant required feature," limiting this situation to 4 hours to ensure proper actions are taken to minimize the time the unit is susceptible to a loss of function if a LOCA/LOOP occurs. In addition, ITS 3.8.1 Required Action B.4 provides a second Completion Time, "6 days from discovery of failure to meet LCO," which limits the total time the LCO is not being met. This could require the Division 3 DG to be restored in a time shorter than the current 72 hours, if another AC Source is already inoperable.	3.8.1 Required Actions B.2 and B.4	N/A
M.4	CTS 3.8.1.1 Action f requires the unit to be placed in Hot Shutdown (Mode 3) if one of the two inoperable offsite circuits is not restored to Operable status in 24 hours. ITS 3.8.1 ACTION F will require the unit to be placed in Mode 4 within 36 hours, in addition to being in Mode 3 within 12 hours.	3.8.1 ACTION F	3.8.1.1 Action f
M.5	Changes from 72 hours to 12 hours the time provided for one offsite circuit and the Division 3 DG to be inoperable concurrently.	3.8.1 ACTION D	3.8.1.1 Action h

THROUGH THE ASSOCIATED AUTOMATIC LOAD SEQUENCE TIME DELAY RELAYS

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.10	Requires, for the LOCA test, the minimum frequency for Division 1 and 2 DGs to be 58.8 Hz within 10 seconds and requires the minimum voltage and frequency for the Division 3 DG to be 3820 V and 58.0 Hz, respectively within 10 seconds; whereas, CTS requires the Division 1 and 2 DGs accelerate to 57 Hz (60 Hz - 3.0 Hz) within 10 seconds and does not provide any minimum voltage or frequency the Division 3 DG must meet within the 10 second DG start time assumed in the accident analysis.	SR 3.8.1.10	4.8.1.1.2.e.5.a), 4.8.1.1.2.e.5.b)
M.11	Adds new requirements to the LOCA test that ensure that Division 1 and 2 permanently connected loads remain energized from the offsite power system and that Division 1 and 2 emergency loads are autoconnected to the offsite power system.	SR 3.8.1.10.d, SR 3.8.1.10.e	N/A
M.12	Requires, for the hot restart test, the minimum voltage the Division 3 DG must meet within the 10 second DG start time assumed in the accident analysis to be 3820 V; whereas, no minimum voltage is currently specified.	SR 3.8.1.13	N/A
M.13	Requires the minimum voltage for the 10 year DG simultaneous start test to be 3950 V for the Division 1 and 2 DGs and 3820 V for the Division 3 DG within 10 seconds; whereas, CTS does not provide a minimum voltage the DGs must attain within the 10 second DG start time assumed in the accident analysis.	SR 3.8.1.18	~~4.8.1.1.2.g.~~ N/A
M.14	Changes, for the single load reject test, the value of the single largest load for the Division 3 DG from 2433 kW to 2435 kW (with the value moved to the Bases as described in DOC LA.5 for ITS 3.8.1), based upon the most current DG loading calculation as provided in the USAR.	SR 3.8.1.7	4.8.1.1.2.e.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.6, Battery Cell Parameters		
M.1	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.8.2.1-1 footnote (d)
M.2	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	Table 4.8.2.1-1, footnote (a) and (b)
M.3	Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float change following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance.	Table 3.8.6-1 footnote (c)	Table 4.8.2.1-1 footnote (f)
	3.8.7, Inverters Operating		
M.1	Clearly defines that an OPERABLE inverter is one that has the capability of being supplied without interruption from its associated DC source (the uninterruptible power supply).	LCO 3.8.7	LCO 3.8.3.1.a.1.c) including footnote , LCO 3.8.3.1.a.2.c) including footnote
M.2	Adds verification of proper inverter voltage and frequency every 7 days.	SR 3.8.7.1	~~3.8.3.1.a.1.c~~ ~~3.8.3.1.a.2.c~~ 4.8.3.1.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.8, Distribution Systems Operating		
M.1	Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.8.a, b, and c to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.8.a, b, or c." CTS does not provide this restriction.	3.8.8 ACTIONS A, B, and C	~~3.8.3.1.a.1~~ ~~3.8.3.1.b.1~~ N/A
M.2	Adds an action which requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems.	3.8.8 ACTION F	~~3.8.3.1.a.1~~ ~~3.8.3.1.b.1~~ N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.9, Distribution Systems Shutdown		
M.1	ITS 3.8.9 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE, whereas CTS is not specific as to what the single required Division 1 or Division 2 distribution subsystem must be powering. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. CTS 3.8.3.2 Actions a.1 and b.1 have been modified to be "one or more required" instead of the current "less than," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem. Currently, this action only applies to the Division 3 equipment (HPCS System).	LCO 3.8.9, 3.8.9 Required Action A.1	LCO 3.8.3.2, 3.8.3.2 Actions a.1 and b.1
M.2	In the event the necessary Division 1, 2, or 3 electrical power distribution subsystems are not OPERABLE, Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. Required Action A.2.5 is added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.9 ACTIONS are required when shutdown cooling is inoperable.	3.8.9 Required Actions A.2.4 and A.2.5	~~3.8.3.2 Actions a.1 and b.1~~ ~~3.8.3.2 Actions a.2 and b.2~~ ~~3.5.2 Action a~~ N/A

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
1.0-LA.1	1.15	Moves the definition of FRACTION OF RATED POWER to the Bases for ITS 3.2.4, Average Power Range Monitor Gain and Setpoint.	Bases	Bases Control Program in ITS Chapter 5	1
1.0-LA.2	1.37	Moves the definition of ROD DENSITY to the Bases for ITS 3.1.2, Reactivity Anomalies.	Bases	Bases Control Program in ITS Chapter 5	1
1.0-LA.3	1.42	Moves the definition of SOURCE CHECK to the Bases for ITS 3.4.7, RCS Leakage Detection System.	Bases	Bases Control Program ~~is~~ ITS Chapter 5 IN	1

INSERT 1.0-LA.4 ATTACHED.

CHANGE TYPE

1. Details of System Design and System Description Including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS Requirements and Related Reporting Requirements
4. Performance Requirements for Indication
5. Relocated Specification/Surveillance Requirement/Administrative Controls Requirement

Insert (Table R Chapter 1.0)

1.0-LA.4	1.31.a, b, c, f	Moves the CTS definition parts a, b, c and f to the Bases for ITS 3.6.1.1, Primary Containment	Bases	Bases Control Program in ITS Chapter 5	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.3.1.1, RPS Instrumentation			
3.3.1.1-LA.1	3.3.1 Action footnotes * and **	The details relating to placing channels in trip (e.g., if tripping causes Trip Function to occur, tripping trip system with the most inoperable channels).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.2	Table 4.3.1.1-1 Notes (b), (e), (f), (h), and 4.3.1.2	Details of the methods for performing CTS 4.3.1.1, the IRM and APRM CHANNEL CHECK (½ decade overlap), the LPRM CHANNEL CALIBRATION (using the TIP System), the APRM Flow-Biased Simulated Thermal Power — Upscale CHANNEL CALIBRATION (includes the flow input function), the APRM Flow-Biased Simulated Thermal Power — Upscale CHANNEL FUNCTIONAL TEST (includes flow input function excluding the flow transmitter), and CTS 4.3.1.2, the LOGIC SYSTEM FUNCTIONAL TEST (simulated automatic operation).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.3	Table 3.3.1-1 Note (b) and footnote *	Requirements for the removal of RPS shorting links.	TRM	10 CFR 50.59	5

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TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANG E TYPE
3.3.1.1-LA.5	Table 3.3.1-1 Notes (e), (g), and (j), and Action 6, Table 2.2.1-1 Function 4	Relocates the following design details: CTS Table 3.3.1-1 Note (e), which states the Main Steam Isolation Valve — Closure Function shall be automatically bypassed when the reactor mode switch is not in the Run position; CTS Table 3.3.1-1 Note (g), which states that the Drywell Pressure—High Function also actuates the Standby Gas Treatment System; CTS Table 3.3.1-1 Note (j), which states that Turbine Stop Valve—Closure and the Turbine Stop Valve Fast Closure, Valve Trip System Oil Pressure—Low Functions also actuate the EOC-RPT System; CTS Table 3.3.1-1 Action 6, which states the corresponding turbine first stage pressure associated with 30% RTP; and CTS Table 2.2.1-1 Function 4, which describes the Allowable Value in terms of inches "above instrument zero." ← INSERT 3.3.1.1-LA.5 ATTACHED	USAR	10 CFR 50.59	1
3.3.1.1-LA.6	Table 2.2.1-1 Note (a)	The statement that the APRM Flow-Biased Simulated Thermal Power—Upscale scram Allowable Value varies as a function of recirculation loop drive flow (W).	Bases	Bases Control Program in ITS Chapter 5	1

INSERT Table R 3.3.1.1-LA.5

In addition, the Applicabilities for the Turbine Stop Valve-Closure and the Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Functions have been modified to be ≥30% RTP, consistent with the design and CTS Table 3.3.1-1 Note (i).

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANG E TYPE
		3.3.5.1, ECCS Instrumentation			
3.3.5.1-R.1	Tables 3.3.3-1, 3.3.3-2, and 4.3.3.1-1 Trip Functions A.2.f and B.2.e	The ADS Manual Inhibit Switch Function requirements.	TRM	10 CFR 50.59	5
3.3.5.1-LA.1	4.3.2.2 and 4.3.3.2	The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.5.1-LA.2	Table 3.3.2-1, including footnote (a), Table 3.3.2-4, Table 3.3.3-1, including footnotes (e) and (f)	System design and operation details (i.e., valve groups and associated isolation signals, bypasses, Trip System Nomenclature, specific equipment affected, etc.)	Bases	Bases Control Program in ITS Chapter 5	1
		3.3.5.2, RCIC System Instrumentation			
3.3.5.2-LA.1	4.3.5.2	The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.5.2-LA.2	Table 3.3.5-1, Note (c) and (e)	System design and operation details that describe the number of trip systems and the logic design for the Manual Initiation and Pump Suction Pressure—Low (Transfer) Functional Units.	Bases	Bases Control Program in ITS Chapter 5	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.7.1, CREF System Instrumentation					
3.3.7.1-LA.1	Table 3.3.7.1-1 Notes (a), (b), and (c)	Details relating to system design and operation; i.e., the Allowable Value is above measured background, design of logic, specific equipment actuated, etc.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.7.2, Mechanical Vacuum Pump Isolation Instrumentation					
3.3.7.2-LA.1	Table 3.3.2-1 Note (e)	The statement that the main steam line radiation high function also trips and isolates the air removal pumps.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.8.1, Loss of Power Instrumentation					
3.3.8.1-LA.1	4.3.3.2	The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.8.1-LA.2	Table 3.3.3-1	Details relating to system design, i.e., the total number of channels provided in the design and the number of channels required to generate a trip.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.8.2, RPS Electric Power Monitoring-Logic					
None	None	None	None	None	None

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.4.1, Recirculation Loops Operating			
3.4.1-LA.1	3.4.1.3 footnote *	Method used to determine the effective core flow.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.1-LA.2	3.4.1.1 Action a.1.a), 4.4.1.1.1.b	Details relating to operational controls of the flow control system during single recirculation loop operation.	USAR	10 CFR 50.59	2
3.4.1-LA.3	3.4.1.1 Actions a.1.b) and a.1.f) (including footnote **), 4.4.1.1.1.a, 4.4.1.1.1.c (including footnote *)	Details relating to operational limits (i.e., single loop operation flow rate and thermal power) during single recirculation loop operation.	USAR	10 CFR 50.59	1
3.4.1-LA.4	3.4.1.1 Action b	Requirement to "immediately initiate action to" reduce THERMAL POWER to the restricted region when no recirculation loops are in operation is relocated in the form of a discussion that "action must be taken as soon as practicable" to restore operation to within the "Unrestricted Zone" of CTS Figure 3.4.1.1-1.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.1-LA.5	3.4.1.1 Actions c and d footnote **, 4.4.1.1.1.d footnote **	Details of the basis of the value of core flow (39%); i.e., core flow which is equivalent to minimum core flow for two recirculation pumps at high speed with minimum flow control valve position.	Bases	Bases Control Program in ITS Chapter 5	1
3.4.1-LA.6	3.4.1.1 Actions c.1 and c.2 footnote ***	Details concerning which LPRM detectors to monitor; i.e., detector levels A and C of one LPRM string per core octant plus detectors A and C of one LPRM string in the center of the core should be monitored.	Bases	Bases Control Program in ITS Chapter 5	3

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TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.5.1, ECCS Operating					
3.5.1-LA.1	LCO 3.5.1	Details relating to system OPERABILITY; i.e., that ECCS subsystems shall have flow paths capable of taking suction from the suppression chamber and transferring water to the reactor vessel.	Bases	Bases Control Program in ITS Chapter 5	1
3.5.1-LA.2	4.5.1.a.1, 4.5.1.c, 4.5.1.c footnote †, 4.5.1.d, 4.5.1.e.2.b)	Methods for performing surveillances; i.e., venting at high point vent, verifying actuation of the system throughout its emergency operating sequence, including each automatic valve actuating to the correct position, verifying the HPCS pump restarts on level 2, verifying the HPCS suction is automatically transferred from the CST to the suppression pool on the proper signals, and verifying proper operation of the ADS valves. The requirement of the 4.5.1.c footnote † is inherently satisfied every time the SR is performed; therefore, the requirement is not specified in the Bases.	Bases	Bases Control Program in ITS Chapter 5	3
3.5.1-LA.3	4.5.1.a.2 footnote *	Description of what "correct position" means for an automatic valve.	Bases	Bases Control Program in ITS Chapter 5	3
3.5.1-LA.4	4.5.1.e.2.d) and e)	Leak limits and associated testing for the ADS pneumatic operating system.	USAR	10 CFR 50.59	5

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.5.2, ECCS Shutdown			
3.5.2-LA.1	LCO 3.5.2, LCO 3.5.3.b.4	Details of what constitutes an OPERABLE ECCS subsystem.	Bases	Bases Control Program in ITS Chapter 5	1
3.5.2-LA.2	3.5.2.e.2, 3.5.3.b.3	Condensate storage tank volume which corresponds to the level limit.	Bases	Bases Control Program in ITS Chapter 5	1
		3.5.3, RCIC System			
3.5.3-LA.1	LCO 3.7.4	Details relating to system OPERABILITY; i.e., that RCIC System shall have a flow path capable of taking suction from the suppression pool and transferring water to the reactor vessel.	Bases	Bases Control Program in ITS Chapter 5	1
3.5.3-LA.2	4.7.4.a.1, 4.7.4.a.3, 4.7.4.c.1, 4.7.4.c.3	Methods for performing surveillances; i.e., by venting from the high point vent, verifying that the RCIC pump controller is in the correct position, verifying RCIC System restart and verifying that each automatic valve in the flow path actuates to the proper position during the actuation test, and verifying the RCIC suction is automatically transferred from the CST to the suppression pool on the proper signal.	Bases	Bases Control Program in ITS Chapter 5	3
3.5.3-LA.3	4.7.4.c.2	150 psig minimum pressure for performing the RCIC System flow test relocated in the form of a discussion describing when adequate pressure is available to perform the test.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE

CHANGE TYPE

1. Details of System Design and System Description Including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS Requirements and Related Reporting Requirements
4. Performance Requirements for Indication
5. Relocated Specification/Surveillance Requirement/Administrative Controls Requirement

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.3-LA.4	3.6.1.2.c 3.6.1.2 Action c 6.8.4.f.3	The requirements concerning THE leakage limit and test pressure for valves in hydrostatically tested lines has not been included in the ITS.	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3-LA.5	4.6.3.2	The requirement to perform ~~CTS 4.6.3.2~~ during COLD SHUTDOWN or REFUELING has not been included in the ITS.	Bases	Bases Control Program in ITS Chapter 5	3
		A FUNCTIONAL TEST OF EACH PRIMARY CONTAINMENT AUTOMATIC ISOLATION VALVE			
3.6.1.4, Drywell and Suppression Chamber Pressure					
None	None	None	None	None	None
3.6.1.5, Drywell Air Temperature					
3.6.1.5-LA.1	4.6.1.6	The method for performing the drywell average air temperature Surveillance (i.e., arithmetic average of the temperatures at various elevations and azimuths).	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.6, RHR Drywell Spray					
3.6.1.6-LA.1	3.6.2.2	The details relating to system OPERABILITY (i.e., the drywell spray function shall have two "independent" loops, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.1.6-LA.2	4.6.2.2.c	The method for performing the Surveillance to verify the drywell spray nozzles are unobstructed (by performance of an air flow test).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.2.4, RHR Suppression Pool Spray					
3.6.2.4-LA.1	3.6.2.2	The details relating to system OPERABILITY (i.e., the suppression pool spray function shall have two "independent" loops, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.3.1, Primary Containment Hydrogen Recombiners					
3.6.3.1-LA.1	3.6.6.1	The detail in relating to system design (i.e., that the recombiners are "independent").	Bases	Bases Control Program in ITS Chapter 5	1
3.6.3.1-LA.2	4.6.6.1.a, 4.6.6.1.b.2	Details of the methods for performing CTS 4.6.6.1.a and CTS 4.6.6.1.b.2 (i.e., the increase in heater coil outlet temperature within 90 minutes, maintaining a minimum heater coil outlet temperature for 4 hours, the heater resistance check be performed within 30 minutes after a functional test, and the heater resistance to ground limit).	Bases	Bases Control Program in ITS Chapter 5	3
3.6.3.2, Primary Containment Oxygen Concentration					
None	None	None	None	None	None
3.6.4.1, Secondary Containment					
3.6.4.1-LA.1	4.6.5.1.c.1	The details concerning the conditions of the drawdown test (i.e., adjusting test conditions to drawdown analysis conditions when starting at a pressure no less than zero psig).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.8.1, AC Sources Operating			
3.8.1-LA.1	LCO 3.8.1.1.a, LCO 3.8.1.1.b, LCO 3.8.1.1.b.3	Details relating to system design and OPERABILITY (i.e., that the offsite circuits are "physically independent," the DGs are "separate and independent," and that each DG has two fuel oil transfer pumps).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.2	N/A ~~4.8.1.1.2.a Table 4.8.1.1.2-1~~	Not Used. ~~The diesel generator accelerated test frequency requirements.~~	N/A ~~TRM~~	N/A ~~10 CFR 50.59~~	N/A ~~3~~
3.8.1-LA.3	4.8.1.1.2.a .4, 4.8.1.1.2.e .5, 4.8.1.1.2.f	Voltage and frequency details for when the DGs are at essentially the steady state conditions (13 seconds after the start signal for Division 1 and 2 DGs and 15 seconds for the Division 3 DG).	Bases	Bases Control Program in ITS Chapter 5	3
3.8.1-LA.4	4.8.1.1.2.e .1	The requirement to inspect the DGs in accordance with procedures prepared in accordance with manufacturer's recommendations.	USAR	10 CFR 50.59	5
3.8.1-LA.5	4.8.1.1.2.e .2	The specific kilowatt value of the single largest post-accident load for the single load rejection Surveillance Requirement.	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.6	4.8.1.1.2.e .9	The specific load value for the auto-connected loads.	USAR	10 CFR 50.59	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.1-LA.7	4.8.1.1.2.e.4.a), 4.8.1.1.2.e.6.a), 4.8.1.1.2.e.6.b)	~~The requirement that the auto-connected loads be energized "through the load timers" for Division 1 and 2, and~~ the requirement that the auto-connected loads be energized "within 10 seconds" for Division 3.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.2, AC Sources - Shutdown					
3.8.2-LA.1	3.8.1.2.b.3	Detail relating to system design and OPERABILITY (i.e., that each DG has two fuel oil transfer pumps).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.2-LA.2	3.8.1.2 Action a	Requirements to suspend crane operations over the spent fuel storage pool following a loss of AC power sources.	USAR	10 CFR 50.59	5
3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air					
None	None	None	None	None	None
3.8.4, DC Sources Operating					
3.8.4-LA.1	LCO 3.8.2.1	Details relating to system OPERABILITY (what constitutes a DC Source division) relocated to Bases and battery identification numbers relocated to USAR.	Bases USAR	Bases Control Program in ITS Chapter 5 10 CFR 50.59	1
3.8.4-LA.2	4.8.2.1.c.3 footnote *	The detail for the basis of the resistance readings (IEEE-450-1980).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.8.8, Distribution Systems Operating			
3.8.8-LA.1	3.8.3.1	The details relating to system design and OPERABILITY (list of distribution buses and that tie breakers between Division 1 and Division 2 buses be open).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.8-LA.2	4.8.3.1.1 including footnote *, 4.8.3.1.2	Details of the methods for performing surveillances on the switchgear, load centers, MCCs, and distribution panels (inoperability status indicator light check and voltage check) to verify the required Distribution Systems are OPERABLE. Term "power availability" is used.	Bases	Bases Control Program in ITS Chapter 5	3
		3.8.9, Distribution Systems Shutdown			
3.8.9-LA.1	3.8.3.2	The details relating to system design and OPERABILITY (list of distribution buses).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.9-LA.2	4.8.3.2.1 Including footnote *, 4.8.3.2.2	Details of the methods for performing surveillances on the switchgear, load centers, MCCs, and distribution panels (inoperability status indicator light check and voltage check) to verify the required Distribution Systems are OPERABLE. Term "power availability" is used.	Bases	Bases Control Program in ITS Chapter 5	3
		Current Specification 3/4.8.4.1, AC Circuits Inside Primary Containment			
None - R.1	3/4.8.4.1	AC Circuits inside primary containment requirements.	TRM	10 CFR 50.59	5

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		5.1, Responsibility			
5.1-LA.1	6.1.1, 6.5.2.3, 6.5.2.5	Replaces the specific title "Plant Manager" with the generic title "plant manager" and relocates the specific title.	USAR	10 CFR 50.59	5
5.1-LA.2	Table 6.2.2-1 footnote (d)	Requirement which states that the Assistant Station Shift Supervisor may assume the control room command function when not also fulfilling the STA role.	USAR	10 CFR 50.59	5
		5.2, Organization			
5.2-LA.1	Table 6.2.2-1	Details of the minimum shift crew requirements.	USAR	10 CFR 50.59	5
5.2-LA.2	6.2.2.d, Table 6.2.2-1 including Notes (c) and (h)	Requirement for two Licensed Operators in the Control Room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips; and requirement for one additional Licensed Operator during Mode 2 and one additional Assistant Station Shift Supervisor and Licensed Operator during Modes 4 and 5 when the process computer is out of operation for > 8 hours.	USAR	10 CFR 50.59	5
5.2-LA.3	6.2.2.e, 6.2.4	Staffing requirements during MODES 1, 2 and 3 and when the emergency plan is activated.	Site Emergency Plan	10 CFR 50.54(q)	5
5.2-LA.4	6.2.2.g including footnote *	The fire brigade manning requirements in CTS, including the allowance to be below the minimum fire brigade composition requirement for a period of up to 2 hours to accommodate unexpected absence.	Fire Protection Plan /USAR	10 CFR 50.59	5

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TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		5.4, Procedures			
5.4-LA.1	6.8.2, 6.8.3	The details of procedure reviews and approvals including temporary changes.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	3
		5.5, Programs and Manuals			
5.5-LA.1	6.8.4.b	The details contained in CTS 6.8.4.b, "In-Plant Radiation Monitoring."	USAR	10 CFR 50.59	3
5.5-LA.2	6.8.4.d	The details contained in CTS 6.8.4.d, "Fire Protection Program."	USAR	10 CFR 50.59	3
5.5-LA.3	6.14.2.a.3, 6.14.2.b	Requirements that the ODCM must be reviewed and accepted by the Station Operations Review Committee (SORC) prior to implementation and to document this review and acceptance. Across reference to Section 13.4 of the USAR is proposed to be made in Appendix B of the USAR.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5
5.5-LA.4	4.0.5	Details of the Inservice Inspection (ISI) Program are relocated; and, since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity.	ISI Program	10 CFR 50.55a	3
5.5-LA.5	4.0.5	Details of the Inservice Testing Program (IST).	IST Program	10 CFR 50.55a	3
5.5-LA.6	4.6.5.3.b.2, 4.6.5.3.c, 4.7.3.c.2, 4.7.3.d	Details of the methods for implementing CTS 4.6.5.3.b.2, 4.6.5.3.c, 4.7.3.c.2, and 4.7.3.d.	TRM	10 CFR 50.59	3
5.5-LA.7	3/4.11.1.4, 3/4.11.2.6	The details for implementing the requirements contained in CTS 3/4.11.1.4 and CTS 3/4.11.2.6.	TRM	10 CFR 50.59	3

SUPPLEMENT TO THE DRAFT SAFETY EVALUATIONS OF DECEMBER 13, 1999

REGARDING THE CONVERSION OF THE CURRENT TECHNICAL SPECIFICATIONS

TO THE IMPROVED TECHNICAL SPECIFICATIONS FOR

NINE MILE POINT NUCLEAR STATION, UNIT NO 2

DOCKET NO. 50-410

(8) ITS 3.3.4.2 (DOC M.2) Verification of ATWS (Anticipated Transient Without Scram) Trip Time Delays

A NEW ~~Two~~ Surveillance Requirements (SRs) ~~have~~ HAS been added (SR 3.3.4.2.4) ~~and 3.3.4.2.5~~ to verify the low frequency motor generator trip portion of the Reactor Vessel Steam Dome Pressure—High Function is not bypassed for > 29 seconds when Thermal Power is > 5% RTP (Rated Thermal Power). ~~These~~ IS SRs ensure that the Reactor Vessel Steam Dome Pressure—High Function is not inadvertently bypassed when it is required to trip the low frequency motor generators. ~~These~~ IS SRs represent additional restrictions on plant operation, enhance plant safety, and therefore ~~are~~ IS acceptable.

(9) ITS 3.3.5.1 (DOCs L.11 & M.4), ITS 3.3.8.1 (DOCs L.8 & M.2), ITS 3.3.8.2 (DOCS L.4 , M.2, & M.3), ITS 3.3.8.3 (DOCs L.4, M.2 & M.3) Changes in Allowable Values & Setpoints 3 4

The licensee stated that the proposed changes are based on their most recent allowable values calculated consistent with methods described in Regulatory Guide (RG) 1.105, Revision 2, dated February 1986, ISA S 67.04-1982, and/or General Electric Setpoint Methodology described in NEDC-31336P-A, limited by the NRC SER, Revision 1, dated November 6, 1995. The proposed allowable values were established from the plant design or safety limits accounting for calibration uncertainty, process measurement uncertainty, primary element uncertainty, instrument uncertainty, and applicable environment effects. Because the proposed changes are based on allowable values calculated by the NRC-approved GE methodology ~~in NEDC-31336P-A;~~ IES ABOVE, these changes are acceptable to the staff.

(25) ITS 3.6.1.2 (DOC L.5) SR Frequency Change (AIR LOCK DOOR)

The licensee proposed to change the surveillance frequency of verifying the air lock door leakage rate within limits from once per 7 days when the airlock is opened for multiple entries (CTS 4.6.1.3.a.1) to once per 30 days (as described in RG 1.163, which is required to be met in ITS 5.5.12). This extension was recommended and approved by the NRC in RG 1.163, September 1995. The licensee indicated that a review of maintenance history has also shown that this test normally passes the leak rate test. The intent of the change continues to ensure that the leakage is maintained within the proper limits, and the consequences of any analyzed event will remain bounded by the current accident analyses.

Based on the above, the staff finds the proposed change in surveillance frequency of verifying the airdoor seal leakage rate from once per 7 days to once per 30 days is acceptable as it meets the requirements of RG 1.163 and has a negligible effect on safety.

(28) ITS 3.6.1.3 (DOC L.9) Excess Flow Check Valve Requirement to Check Flow is ~~Deleted~~ Revised

The licensee proposed to ~~delete~~ replace the requirement in CTS 4.6.3.4 that each excess flow check valve (EFCV) must check flow with the corresponding proposed ITS SR 3.6.1.3.9 that requires ~~the~~ each EFCV to actuate to ~~their~~ its isolation position (i.e., closed) on an actual or simulated instrument line break signal. The licensee indicated that the requirements for the EFCVs are provided in 10 CFR Part 50 Appendix A, GDCs 55 and 56, and in RG 1.11. These requirements state that there should be a high degree of assurance that the EFCVs will close or be closed if the instrument line outside containment is lost during normal reactor operation, or under accident conditions. The proposed SR ensures this requirement, since it requires ~~the~~ each EFCV to isolate to the isolation position (closed) on an instrument line break signal. The CTS requirement does not specifically require the valve to close fully, just to "check flow". Thus, the proposed ITS SR 3.6.1.3.9 ensures the RG 1.11 provision is met. The licensee also stated that the Instrument Line Break Analysis in the NMP2 USAR Section 15.6.2 does not even assume the valve closed. Since the actual leakage limit is not an assumption in the accident analysis, the leakage limit (i.e., check flow) is proposed to be deleted. The licensee also indicated that a similar change was approved by the NRC for the most recent BWR/5 ITS submittal.

Based on the above and an evaluation of the General Electric Nuclear Energy Topical Report B21-00658-01, "Excess Flow Check Valve Testing Relaxation", the staff finds the proposed change in surveillance of EFCV from check flow to actuate to their isolation position to have a negligible effect on safety and is therefore, acceptable.

(30) ITS 3.6.1.6 (DOC L.1), ITS 3.6.2.4 (DOC L.1) Spray Flows SR

Drywell spray flow (ITS 3.6.1.6)

CTS 3.6.2.2 requires the drywell spray mode of the RHR System to be capable of recirculating water from the suppression pool through the RHR heat exchangers to the drywell spray spargers. The proposed ITS 3.6.1.6 relocates the details of what constitutes an Operable drywell spray subsystem to the Bases. However, the requirement to circulate water through the heat exchanger has not been included. The licensee indicated that the drywell sprays are required to reduce pressure in the drywell and provide mixing of the atmosphere, not cool the primary containment atmosphere. These functions can be met without cooling the suppression pool water prior to spraying it into the drywell. The analysis for drywell spray does not credit cooling of the suppression pool to perform the pressure mitigation and atmosphere mixing functions. The suppression pool cooling mode, which is governed by another Technical Specification (CTS 3/4.6.2.3 and ITS 3.6.2.3) ensures heat can be removed from the primary containment, as assumed in the accident analysis. Also, the time an RHR subsystem would be in the drywell spray mode is short and this is not a concern for spray pool cooling. While the analysis for inadvertent drywell spray does credit cooling through the heat exchanger, this is to maximize the effect of the inadvertent spray. If the heat exchangers are not functioning during this event, the consequences of an inadvertent spray will not be as severe. The drywell spray system is not

assumed to be an initiator of any analyzed event in which flow not through the RHR heat exchanger is more limiting.

Based on the above, the staff finds the proposed change in ITS 3.6.1.6 from the CTS 3.6.2.2 for not including that the drywell spray water flow through the RHR heat exchanger is acceptable. The proposed change has a negligible effect on safety as it still provides assurance that the drywell spray system will be maintained OPERABLE, and another proposed Technical Specification will ensure cooling of the drywell to be maintained.

Suppression Pool spray flow (ITS 3.6.2.4)

CTS 3.6.2.2 and 4.6.2.2.b requires the suppression pool spray mode of the RHR System to be capable of recirculating water from the suppression pool through the RHR heat exchangers to the suppression pool spray spargers. The proposed ITS 3.6.2.4 relocates the details of what constitutes an Operable suppression pool spray subsystem to the Bases. However, the requirement to circulate water through the heat exchanger has not been included. The licensee indicated that the suppression pool sprays are required to reduce pressure in the suppression pool airspace, which will reduce pressure in the drywell. In addition, it also reduces the pressure buildup caused by bypass leakage paths. While the suppression pool spray does provide a cooling effect that also reduces pressure in the suppression pool airspace, adequate cooling effect is provided by a combination of the suppression pool sprays without flow through the RHR heat exchanger and the suppression pool cooling mode. The suppression pool cooling mode is governed by another Technical Specification (CTS 3/4.6.2.3 and ITS 3.6.2.3). The accident analysis does not credit the cooling function of the RHR heat exchangers in the pressure mitigation function of the suppression pool spray system.

Based on the above, the staff finds the proposed change in ITS 3.6.2.4 from the CTS 3.6.2.2 and 4.6.2.2 for not including that the suppression pool spray water flow through the RHR heat exchanger is acceptable. The proposed change has a negligible effect on safety as it still provides assurance that the suppression pool spray system will be maintained OPERABLE, and another proposed Technical Specification will ensure cooling of the drywell to be maintained.

(31) ITS 3.6.3.1 (DOC L4.2) ~~SR Requirement~~ HYDROGEN RECOMBINER COMPLETION TIME

CTS 3.6.6.1 ACTION only permits one hydrogen recombiner to be inoperable. If two hydrogen recombiners are inoperable CTS 3.0.3 is entered, since CTS 3.6.6.1 provides no actions for this condition. The licensee has proposed an additional ACTION in ITS 3.6.3.1(ACTION B) for the condition of both containment hydrogen recombiners inoperable. This ACTION incorporates STS 3.6.3.1 ACTION B which allows two hydrogen recombiners to be inoperable for up to 7 days provided the hydrogen control function is maintained. This new ACTION would possibly prevent unnecessary shutdown and the increased potential for transients associated with each shutdown. The use of STS 3.6.3.1 ACTION B is allowed, as specified in a Bases Reviewer's Note, provided that the alternate hydrogen control system is found to be acceptable to the staff. The licensee stated that the NMP2 nitrogen inerting and purge system can also control hydrogen in a post-LOCA environment.

The licensee indicated that the alternate hydrogen control for NMP2 has not been approved earlier since RG 1.7, Revision 2 only requires a combustible gas control system to be installed to control hydrogen. The NMP2 design includes redundant hydrogen recombiners which satisfy the requirements of RG 1.7. RG 1.7 specifically states that a containment purge system cannot be used as the primary method of controlling hydrogen after an accident but that it should be capable of aiding in cleanup. The NMP2 Vent and Purge System meets the RG 1.7 provisions. In combination with the inerting portion of the system, it can perform an alternate hydrogen control function (it can control hydrogen and oxygen). The NRC has previously reviewed and approved a similar method for the recent BWR/5 ITS submittal. This method will not be the primary method for controlling hydrogen and oxygen, but is being used to justify a 7-day Completion Time in the unlikely event that both hydrogen recombiners are inoperable.

The proposed change does not involve a significant reduction in safety. The margin of safety for this system is based on the capacity and redundancy of the system. Since the capacity is not changed and the system is backed by ~~other~~ method to control hydrogen, the capability for adequate response to the need for the hydrogen control function is maintained. In addition, the proposed change will prevent unnecessary shutdowns and the associated risk of potential transients.

The NRC staff has reviewed the licensee nitrogen inerting and purge system as an alternate system to control hydrogen for a period of 7 days when the two redundant hydrogen recombiners as a primary system are not available. The alternate system meets RG 1.7, is similar to earlier approved BWR/5 ITS submittals, and, therefore, it is acceptable.

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Date: