TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	1.1	1.0, 4.1.1.c
A.2	The definitions of AVERAGE PLANER EXPOSURE, E-AVERAGE DISINTEGRATION ENERGY, GASEOUS RADWASTE TREATMENT SYSTEM, LIMITING CONTROL ROD PATTERN, MEMBER(S) OF THE PUBLIC, MILK SAMPLING LOCATION, PURGE-PURGING, REPORTABLE EVENT, SITE BOUNDARY, SOLIDIFICATION, UNRESTRICTED AREA, VENTILATION EXHAUST TREATMENT SYSTEM, and VENTING are deleted since specific Specifications referring to them no longer contain their use, or no longer are retained in the NMP2 ITS.	N/A	1.2, 1.11, 1.17, 1.20, 1.23, 1.24, 1.33, 1.36, 1.40, 1.41, 1.47, 1.48, 1.49
A.3	Revises the wording for the definitions of CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, and LOGIC SYSTEM FUNCTIONAL TEST to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels have a "required" sensor, alarm, or channel failure trip function, and, conversely, some channels may have a "required" display or interlock function. Also, combining the separate definition/requirement for analog and bistable channels, and the phrase "or actual," in reference to the injected signal for the CHANNEL FUNCTIONAL TEST, has been added as an explicit option to the currently required simulated signal.	1.1 CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.4, 1.6, 1.22
A.4	Adds specific CHANNEL CALIBRATION requirements for thermocouples or RTDs; i.e., verification of OPERABILITY of the sensing element and a calibration of the remaining adjustable devices in the channel.	1.1 CHANNEL CALIBRATION definition	1.4
A.5	Adds movement of sources to the CORE ALTERATION definition.	1.1 CORE ALTERATION definition	1.7

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	Incorporates current definitions of CRITICAL POWER RATIO and FRACTION OF LIMITING POWER DENSITY into the ITS definitions of MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY, respectively.	1.1 MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY definitions	1.9, 1.14
A.7	Moves the intent of applying the MODE definition only when fuel is in the vessel to the ITS definition of MODE. Since the vessel head can only be removed if the head closure bolts are less than fully tensioned, there is no purpose in including the phrase "or with the head removed."	1.1 MODE definition	Table 1.2, footnote ††
A.8	Deletes the definition of FREQUENCY NOTATION since the abbreviations in CTS Table 1.1 are no longer used; SR Frequencies in ITS are directly specified.	N/A	1.16
A.9	Combines the current definitions for IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE into one defined term: LEAKAGE.	1.1 LEAKAGE definition	1.18, 1.30, 1.46
A.10	Provides clarifications: 1) as specified in the second portion of the current definition of IDENTIFIED LEAKAGE (proposed LEAKAGE definition), the intended leakage is that which occurs into the drywell space (i.e., containment atmosphere); and 2) the "collection systems" specified in the first portion of the definitions are intended to be those for collection of leakages into the drywell space.	1.1 LEAKAGE definition	1.18
A.11	Modifies the ISOLATION SYSTEM RESPONSE TIME definition to not include diesel generator starting and loading times, since they are redundant to the diesel generator Surveillance Requirements in CTS 3.8.1.1.	1.1 ISOLATION SYSTEM RESPONSE TIME definition	1.19

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.12	Deletes CTS Table 1.2, footnotes # and ##, referencing Special Test Exceptions 3.10.1, 3.10.3, and 3.10.7, since the footnotes only serve as a cross reference.	N/A	Table 1.2 footnotes # and ##
A.13	Modifies the definition of LOGIC SYSTEM FUNCTIONAL TEST to exclude the actuated device; the actuated device is tested as part of a system functional test.	1.1 LOGIC SYSTEM FUNCTIONAL TEST definition	1.22
A.14	Moves the definition of OFFSITE DOSE CALCULATION MANUAL to ITS 5.5.1.	5.5.1	1.26
A.15	More explicitly states "normal or emergency electrical power" versus the non-specific "necessary...electrical power" requirement, since it is intended to be a requirement for only one source of power to be able to declare OPERABILITY. Also, "specified function" is changed to "specified safety function(s)."	1.1 OPERABLE-OPERABILITY definition	1.27
A.16	Replaces OPERATIONAL CONDITION-CONDITION with the ITS definition of MODE. Clarifying statements are added to indicate that defined MODES in ITS Table 1.1-1 apply only when fuel is in the reactor vessel and that reactor vessel head closure bolt tensioning is a parameter.	1.1 MODE defintion	1.28
A.17	Deletes the definitions of PRIMARY CONTAINMENT INTEGRITY and SECONDARY CONTAINMENT INTEGRITY; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section.	N/A	1.31 1.38
A.18	Moves the definition of PROCESS CONTROL PROGRAM to the Discussion of Changes for the Administrative Controls Chapter (Chapter 5.0).	5.0	1.32
A.19	Adds Section 1.2, Logical Connectors, 1.3, Completion Times, and 1.4, Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2, 1.3, 1.4	N/A

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.20	Modifies the definition of SHUTDOWN MARGIN to address stuck control rods, consistent with the CTS requirement found in CTS 4.1.1.c to account for the worth of a stuck control rod.	1.1 SHUTDOWN MARGIN definition	1.39, 4.1.1.c
A.21	Modifies the definition of STAGGERED TEST BASIS, allowing the minimum Surveillance interval to be specified in the Surveillance Requirements' Frequency column of the applicable LCOs, independent of the number of subsystems.	1.1 STAGGERED TEST BASIS definition	1.43
A.22	Moves CTS Table 1.2, footnotes *, **, and † to LCO requirements in the Special Operations Section.	3.10.2, 3.10.3, 3.10.4	Table 1.2 footnotes *, **, and †

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CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	2.0	2.0
A.2	Moves requirements for the Limiting Safety System Settings to ITS Section 3.3.	3.3	2.2
A.3	Deletes the details contained in the Actions of CTS 2.1.1, 2.1.2, 2.1.3, and 2.1.4 to comply with the requirements of CTS 6.7, since the ITS format does not include providing cross references and CTS 6.7 has been deleted.	N/A	2.1.1, 2.1.2, 2.1.3, 2.1.4
A.4	Deletes statement that the MCPR Safety Limit is applicable to Cycle 7 operation only. If the MCPR Safety Limit is affected as determined by reload analyses, then a Technical Specification change would have to be made prior to starting up.	N/A	2.1.2 footnote *

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	3.0	3.0, 4.0
A.2	Renumbers the CTS 3.0 series to LCO 3.0.X and the CTS 4.0 series to SR 3.0.X.	3.0	3.0, 4.0
A.3	1) Replaces the phrase "Compliance with...is required" with the phrase "LCOs shall be met"; 2) Changes "OPERATIONAL CONDITIONS" to "MODES"; 3) Changes "Conditions specified therein" to "specified conditions in the Applicability"; and 4) Changes the phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met" to "as provided in LCO 3.0.2 and LCO 3.0.7." (LCO 3.0.2 addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. LCO 3.0.7 addresses another situation when an LCO requirement is allowed not to be met.)	LCO 3.0.1	3.0.1
A.4	1) Replaces the lead-in sentence "Noncompliance with a Specification shall exist when..." with "Upon discovery of a failure to meet an LCO..."; 2) Adds exceptions to LCO 3.0.5 and LCO 3.0.6 due to their inclusion in NMP2 ITS; 3) Changes the phrase "restored" to "met or is no longer applicable;" "time intervals" is changed to "Completion Time(s);" and "Action requirements" is changed to "Required Action(s)"; and 4) Adds the phrase "unless otherwise stated" consistent with current NMP2 TS exceptions found in a few LCOs to avoid potential misapplication of those requirements.	LCO 3.0.2	3.0.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	1) Replaces the phrase "except as provided in the associated Action requirements" with "and the associated Actions are not met, an associated Action is not provided, or if directed by the associated Actions" to cover all potential possibilities that require entry into LCO 3.0.3; 2) "OPERATIONAL CONDITION" is changed to "MODE or other specified condition"; 3) The times to reach each MODE are revised to include the 1 hour allowed by CTS 3.0.3 for initiating the shutdown. Also, the time represents the total time allowed from the entry into LCO 3.0.3, replacing the current presentation where each time is referenced as "the next," or "the following," or "the subsequent"; 4) The phrase "under the ACTION requirements...failure to meet the Limiting Condition for Operation" is changed to "in accordance with the LCO or Actions, completion of the actions required by LCO 3.0.3 is not required," to specifically state that LCO 3.0.3 actions do not have to be completed; and 5) The sentence "This Specification is not applicable in OPERATIONAL CONDITION 4 or 5" is changed to "LCO 3.0.3 is only applicable in MODES 1, 2, and 3."	LCO 3.0.3	3.0.3
A.6	1) "Entry into an OPERATIONAL CONDITION or other specified condition" has been changed to "When an LCO is not met, entry into a MODE or other specified condition in the Applicability..."; 2) "This provision shall not prevent passage through OPERATIONAL CONDITIONS as required to comply with ACTION requirements..." is reworded to "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit"; 3) "Exceptions to these requirements are stated in the individual specifications" has been changed to "Exceptions to this Specification are stated in the individual Specifications"; and 4) "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3," has been added.	LCO 3.0.4	3.0.4
A.7	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)).	LCO 3.0.6	N/A

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SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	ITS LCO 3.0.7 is added to provide guidance regarding the meeting of Special Operations LCOs in Section 3.10.	LCO 3.0.7	N/A
A.9	ITS SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," is proposed to clarify existing intent that is not explicitly stated. The concept (editorially rewritten) found in the first sentence of CTS 4.0.3, has been moved to the third sentence of SR 3.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.3, to ITS SR 3.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase is also added: "or variables outside specified limits."	SR 3.0.1	4.0.1, 4.0.3
A.10	"The specified Frequency for each Surveillance Requirement is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met," was added to clearly establish what constituted meeting the specified Frequency of each Surveillance Requirement. Also, the sentence "Exceptions to this Specification are stated in the individual Specifications" is added to acknowledge the explicit use of exceptions in various Surveillances.	SR 3.0.2	4.0.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.11	1) "Entry into an OPERATIONAL CONDITION or other specified applicable condition" has been changed to "Entry into a MODE or other specified condition in the Applicability of an LCO"; 2) "...passage through or to OPERATIONAL CONDITIONS as required to comply with the ACTION requirements," is reworded to "entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit"; and 3) "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3" has been added.	SR 3.0.4	4.0.4
A.12	The technical content of CTS 4.0.5 has been moved to ITS 5.5.6.	5.5.6	4.0.5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.1.1
A.2	Changes the passive CTS 3.1.1 Action b words of "verify...inserted" to the active ITS 3.1.1 Required Actions C.1 and D.1 "Initiate action to insert...".	3.1.1 Required Actions C.1 and D.1	3.1.1 Action b
A.3	Deletes redundant Required Actions, CTS 3.1.1 Actions b and c, which require suspension of activities that could reduce the SDM, when the SDM is not within limits in MODES 3, 4, or 5. In MODES 3 and 4, the vessel head is bolted in place, and the only activity that can significantly reduce SHUTDOWN MARGIN (SDM) is control rod withdrawal, for which a Required Action that ensures control rods remain inserted is provided. In MODE 5, the only activities that can affect SDM are CORE ALTERATIONS and control rod withdrawal, for which Required Actions are provided to suspend CORE ALTERATIONS and ensure control rods remain inserted.	N/A	3.1.1 Actions b and c
A.4	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.1.1 Actions b and c
A.5	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.1.1 Actions b and c

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	Enhances presentation by requiring actions to be immediately initiated to insert all required control rods (completing the actions as soon as possible) in lieu of current requirement to insert the required control rods in 1 hour (initiating the actions as soon as possible).	3.1.1 Required Action E.2	3.1.1 Action c
A.7	A specific completion time for the SDM test is proposed to clarify when "prior to or during the first startup" applies. Most SDM tests are performed as an in-sequence critical and, therefore, 4 hours after reaching criticality is provided in ITS SR 3.1.1.1 as a reasonable time to perform the required calculations and have appropriate verification completed.	SR 3.1.1.1	4.1.1.a
A.8	Replaces the activity referred to as "refueling" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of the Surveillance Requirement is to perform the SDM test after in-vessel activities which could have altered SDM.	SR 3.1.1.1	4.1.1.a
A.9	Moves the CTS 4.1.1.c requirement to perform a SDM test after finding a stuck control rod to ITS 3.1.3.	3.1.3	4.1.1.c
	3.1.2, Reactivity Anomalies		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.1.2
A.2	Changes "reactivity equivalence of the difference" to "reactivity difference."	LCO 3.1.2, SR 3.1.2.1	3.1.2, 4.1.2
A.3	A specific completion time for the reactivity anomaly surveillance is proposed to clarify when "during the first startup" the test must be performed. This test is performed by comparing the difference between the actual control rod density to the predicted control rod density as a function of cycle exposure while at steady state reactor power conditions. Therefore, "24 hours after reaching these conditions" is provided as a reasonable time to perform the required calculations and complete the appropriate verification, meeting the intent of the CTS.	SR 3.1.2.1	4.1.2.a

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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," which is consistent with the intent of the CTS.	3.1.3 ACTIONS Note	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.	3.1.3 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

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.	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.	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

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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).	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 ≤ 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

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." This action is always an option and is implied in the ITS Actions.	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).	SR 3.1.3.5	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

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.	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.	3.9.5	3/4.1.3.5
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," which is consistent with the intent of the CTS.	3.1.5 ACTIONS Note	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.	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

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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 piping temperature drops below the lower limit (70°F) rather than whenever both heat tracing circuits have been found to be inoperable, making the SR apply when meaningful.	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

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Adds an LCO and Applicability statement for the scram discharge volume (SDV) vent and drain valve requirements, explicitly stating existing operability requirements.	LCO 3.1.8	3.1.3.1
A.3	Clarifies that the signal used for performing CTS 4.1.3.1.4.a.1 and CTS 4.1.3.1.4.a.2 can be an "actual or simulated" signal.	SR 3.1.8.3	N/A
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support			
None	None	None	None
Current Specification 3/4.1.4.2, Rod Sequence Control System			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised numbering.	3.2.1	3/4.2.1
A.2	Deletes the phrase concerning APLHGR limits when in single recirculation loop operation since the phrase is duplicated in this LCO and Action a.1.d) of CTS 3/4.4.1.	N/A	3.2.1
A.3	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.1
	3.2.2, Minimum Critical Power Ratio		
A.1	Editorial changes, reformatting, and revised numbering.	3.2.2	3/4.2.3
A.2	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.3
A.3	Moves CTS 3.2.3 ACTIONS a and b to Sections 3.3 and 3.7, respectively.	3.3.4.1, 3.7.5	3.2.3 Action a, 3.2.3 Action b
A.4	Deletes the frequencies of CTS 4.2.3.b since they are duplicative of those in CTS 4.2.3.a; i.e., once a new MCPR limit is determined per CTS 4.2.3.b, the frequencies of CTS 4.2.3.a still apply and MCPR would have to be verified to be within the new limit within these frequencies.	SR 3.2.2.2	4.2.3.b
	3.2.3, LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised numbering.	3.2.3	3/4.2.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.4
	3.2.4, APRM Gain and Setpoint		
A.1	Editorial changes, reformatting, and revised numbering.	3.2.4	3/4.2.2
A.2	Changes the reference to the Trip Setpoint of the APRM flow-biased simulated thermal-upscale trip in CTS 3.2.2, including the Action, to Allowable Value; the limits are not changed.	LCO 3.2.4.b	3.2.2, 3.2.2 Action
A.3	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.2
A.4	CTS states that the APRM flow biased simulated thermal power upscale scram setpoint shall be established according to the relationship specified in the COLR. CTS 4.2.2, footnote ** also states this relationship (T) is in the COLR. This relationship is not cycle specific; it is always the ratio of FRTP and the MFLPD. Therefore, the relationship currently specified in the COLR is added.	LCO 3.2.4.b, SR 3.2.4.2.a	3.2.2, 4.2.2 footnote **

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"), 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.	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
A.5	CTS Table 3.3.1-1 Note (d) states that the Reactor Vessel Steam Dome Pressure High Function (Functional Unit 3) is not required to be OPERABLE in MODE 2 when the reactor vessel head is removed per CTS 3.10.1. CTS Table 3.3.1-1 Note (f) and CTS Table 4.3.1.1-1 Note (l) state that the Drywell Pressure High Function (Functional Unit 7) is not required to be OPERABLE in MODE 2 when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3.10.1 is being used). These notes are deleted from CTS Table 3.3.1-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.3.1-1 Notes (d) and (f), Table 4.3.1.1-1 Note (l)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	All MSIV channels are required to be OPERABLE to ensure a scram with the worst case single failure. In ITS, each MSIV contact is viewed as a separate channel (a total of 16 channels). Therefore, the minimum number of channels is more appropriately specified as "8" in Function 5 of ITS Table 3.3.1.1-1. In addition, all Manual Scram channels are required to be OPERABLE to ensure a manual scram can be inserted by the operator. Each manual scram switch and manual pushbutton channel provides two inputs to the RPS logic; one input actuated by rotating a collar switch and a second input by depressing the inner pushbutton. Using the ITS format that each input is considered a channel, the minimum channels per trip system is more appropriately specified as "4" in ITS Table 3.3.1.1-1 Function 11.	Table 3.3.1.1-1 Functions 5 and 11	Table 3.3.1-1 Functional Units 5 and 12
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 (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).	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.	LCO 3.0.4	Table 4.3.1.1-1 Function 1.a Frequency and Note (c)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	**CTS SECTION**
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)
A.11	CTS Table 3.3.1-1 Footnote 1 specifies that since each APRM provides input to both trip systems, the minimum operable channels specified in Table 3.3.1-1 for APRM Functions 2.a, 2.b, 2.c, and 2.d are the total APRM channels required (i.e., it is not on a trip system basis). ITS Table 3.3.1.1-1 does not include this footnote, since the ITS format is that each input is considered a channel. Thus each RPS trip system has three required channels per logic channel, and two channels in each RPS trip system (one per logic channel) has a common APRM sensor as described in the ITS Bases.	N/A	Table 3.3.1-1 Footnote 1
A.12	CTS Table 3.3.1-1 footnote (k) and CTS Table 4.3.1.1-1 footnote (n), which require the APRM Functional Units 2.a, 2.d, and 2.e to be Operable during shutdown margin demonstrations performed per Specification 3.10.3 are moved to ITS 3.10.8.	3.10.8	Table 3.3.1-1 footnote (k), Table 4.3.1.1-1 footnote (n)
A.13	The CTS Limiting Safety System Settings (Setpoints) Table 2.2.1-1 has been combined with the current RPS Technical Specification (CTS 3/4.3.1). The information in CTS Table 2.2.1-1 is located in ITS Table 3.3.1.1-1.	3.3.1.1, Table 3.3.1.1-1	Table 2.2.1-1, 3/4.3.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.14	CTS Table 2.2.1-1 Note (a) provides the Allowable Value for the APRM Flow-Biased Simulated Thermal Power Upscale when in single loop operation. The Note provides the definition of ΔW, and states the value of ΔW for two loop and single loop operation. The value for two loop operation is 0, thus the Allowable Value in ITS Table 3.3.1.1-1 Function 2.b does not include the ΔW term (W-ΔW=W). ITS Table 3.3.1.1-1 Note (b) provides the Allowable Value for the single loop condition. In lieu of describing it as .58(W-ΔW) + 62% RTP, and then describing that ΔW=5%, the Allowable Value is written as .58(W - 5%) + 62% RTP.	Table 3.3.1.1-1 Function 2.b, including Note (b)	Table 2.2.1-1 Note (a)
A.15	CTS 4.3.1.2 states that Functions 2.a, 2.b, 2.c, and 2.d do not require a Logic System Functional Test (LSFT). In ITS 3.3.1.1, Table 3.3.1.1-1, Surveillance Requirements Column, all required Surveillance Requirements are listed for each Function. For Functions 2.a, 2.b, 2.c, and 2.d, the LSFT Surveillance (ITS SR 3.3.1.1.14) is not listed in the Table.	Table 3.3.1.1-1 Functions 2.a, 2.b, 2.c, and 2.d	4.3.1.2
3.3.1.2, SRM Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.3.7.6, 3/4.9.2
A.2	CTS requirements to "verify (control rods)...inserted," are replaced in ITS 3.3.1.2 Required Action D.1 with an equivalent but more definitive requirement to; "Fully insert...."	3.3.1.2 Required Action D.1	3.3.7.6 Action b
A.3	Adds a Note 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

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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. This is acceptable since the first option is the latest time in which SRM count rate must be met.	N/A	4.9.2.c
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
A.2	The reference to "OPERATIONAL CONDITION 1" from the CTS Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER" is not used in the ITS. 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	3.1.4.1 Action b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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
A.4	Adds ITS ACTIONS Note "Separate Condition Entry is allowed for each channel," which is consistent with the intent of the CTS.	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
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," which is consistent with the intent of the CTS.	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

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	**CTS SECTION**
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
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," 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 the 18-month Channel Check Surveillance Frequency is identical to the channel calibration frequency, and 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 **

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" from the CTS Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER," is not used in the ITS. 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	3.3.4.2 Applicability
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	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.	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
	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," which is consistent with the intent of the CTS.	3.3.4.2 ACTIONS Note	3.3.4.1 Actions

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	**CTS SECTION**
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," which is consistent with the intent of the CTS.	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
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

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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 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.	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
SECTION 3.3 - INSTRUMENTATION

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," which is consistent with the intent of the CTS.	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

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

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," which is consistent with the intent of the CTS.	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.	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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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.	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

TABLE A - ADMINISTRATIVE CHANGES MATRIX
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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 *** modifies an Allowable Value, and 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)

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.15	Deletes the CHANNEL FUNCTIONAL TEST of CTS Manual Initiation Functions, since the LSFT is a complete test of the logic, including the Manual Initiation switches, and is performed at the same Frequency. ITS 3.3.6.1 only requires an LSFT.	SR 3.3.6.1.6	Table 4.3.2.1-1 Trip Functions 1.m and 2.g, 4.3.2.2
A.16	For certain Functions in CTS Table 3.3.2-1, the total number of channels per trip system are listed in lieu of listing the number of channels per trip system on an area or room basis. The format of the ITS is to provide the number of channels per trip system on an area or room basis. Therefore, the following changes are made to CTS Table 3.3.2-1: a) The Main Steam Line Tunnel Lead Enclosure Temperature - High Function, requires 6 total channels per trip system. There are three areas (east, west, and center) monitored for this Function, with two channels per area in each trip system. Therefore, in ITS Table 3.3.6.1-1 Function 1.g, the required channels per trip system is listed as 2 per area. b) The RHR Equipment Room Area Temperature - High Function, requires 2 total channels per trip system. There are two areas (heat exchanger and pump) monitored for this Function, with one channel per area in each trip system. Therefore, in ITS Table 3.3.6.1-1 Functions 3.g and 5.a, the required channels per trip system is listed as 1 per area.	Table 3.3.6.1-1 Functions 1.g, 3.g, 3.h, 3.i, 4.d, 4.e, 5.a, 5.d, and 5.e	Table 3.3.2-1 Trip Functions 1.d.3, 1.f, 1.j.1), 1.j.2), 1.k.1), 1.k.2), 1.k.3), and 1.l

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. 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.		

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," which is consistent with the intent of the CTS.	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.	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 term Reactor Building Integrity is not used in the ITS format. The elements of the CTS requirements included in the 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 *

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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," which is consistent with the intent of the CTS.	3.3.7.1 ACTIONS Note	3.3.7.1 Actions
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	3.3.7.1 Action c
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

DOC #	SUMMARY	ITS SECTION	**CTS SECTION**
	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," which is consistent with the intent of the CTS.	3.3.7.2 ACTIONS Note	3.3.2 Actions
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.	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 Setpoint 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	Table 3.3.2-2 Footnote **

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SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	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
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	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.	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

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
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
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.	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

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DOC #	SUMMARY	ITS SECTION	**CTS SECTION**
Current Specification 3/4.3.7.8, Loose Part Detection System			
None	None	None	None
Current Specification 3/4.3.7.9, Radioactive Liquid Effluent Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.7.10, Radioactive Gaseous Effluent Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.9, Plant Systems Actuation Instrumentation			
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
A.7	Deletes the existing reference in CTS 3.4.1.1 Action a.1.g) (including footnote *) to "Perform Surveillance Requirement 4.4.1.1.2. ..." SRs 3.4.11.5 and 3.4.11.6 prescribe these identical necessary conditions for compliance (i.e., THERMAL POWER ≤ 30% RTP and jet pump loop flow ≤ 50% of rated) without such references in an Action.	SR 3.4.11.5 and SR 3.4.11.6	3.4.1.1 Action a.1.g), including footnote *
A.8	Moves CTS 4.4.1.1.2 (including footnote ***) requirements for increasing THERMAL POWER of loop flow to ITS 3.4.11; and moves CTS 4.4.1.1.3 requirements for flow control valves to ITS 3.4.2.	3.4.11, 3.4.2	4.4.1.1.2 including footnote ***, 4.4.1.1.3
A.9	Deletes CTS 3.4.1.3 Action a which requires restoration of the jet pump loop flow to within the limits if they are not within the limits. ITS does not explicitly detail options to "restore...to within the specified limit" when an alternate ACTION is provided that allows continued operation.	N/A	3.4.1.3 Action a
A.10	Deletes CTS 3.4.1.3 Action b which requires action to be taken per CTS 3.4.1.1 when a recirculation loop is shutdown, since ITS prescribes the necessary conditions for compliance without such references.	N/A	3.4.1.3 Action b
3.4.2, Flow Control Valves (FCVs)			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.2	4.4.1.1.3
A.2	Adds new LCO, Applicability, and Actions to clarify the CTS intent for OPERABILITY of the Recirculation System flow control valves.	3.4.2	4.4.1.1.3
3.4.3, Jet Pumps			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.4.1.2

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	3.4.3.2 Actions

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, which is consistent with the intent of the CTS.	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

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," which is consistent with the intent of the CTS.	3.4.10 ACTIONS Note	N/A
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

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, which is consistent with the intent of the CTS.	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.	LCO 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 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Deletes CTS 4.4.1.1.2.c and 3.4.1.4.b requirements to monitor the temperature difference between an idle loop and an operating loop since they are redundant to the loop-to-coolant requirement of CTS 4.4.1.1.2.b (ITS SR 3.4.11.6) and CTS 3.4.1.4.a and 4.4.1.4 (ITS SR 3.4.11.4.)	N/A	4.4.1.1.2.c, 3.4.1.4.b
3.4.12, Reactor Steam Dome Pressure			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.12	3/4.4.6.2
Current Specification 3/4.4.4, Chemistry			
None	None	None	None
Current Specification 3/4.4.8, Structural Integrity			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.5.1	3/4.5.1, 4.3.3.3
A.2	Deletes Applicability footnote **, which provides a cross reference to CTS 3.10.6, since LCO 3.0.7 adequately prescribes the use of the Special Operations LCOs without such references.	N/A	3.5.1 footnote **
A.3	Deletes the statements in CTS 3.5.1 Actions a, b, c, d, and e that require the opposite division equipment ("provided that..."). ITS 3.5.1 ACTION H provides direction for various interrelationships between the Division 1 and/or 2 ECCS subsystems and the Division 3 system. ITS ACTION H requires entry into LCO 3.0.3 for various combinations of inoperable components which is consistent with the present ACTIONS for the same combinations, except as identified in Discussion of Change L.4.	3.5.1 ACTION H	3.5.1 Actions a, b, c, d, and e
A.4	Deletes CTS 3.5.1 Actions b.3 and d.3, 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, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.9.	N/A	3.5.1 Actions b.3 and d.3, footnote *
A.5	Change in presentation in that proposed SR 3.5.1.4 requires the ECCS pumps to develop the flow rate with a specified developed head in psid. CTS 4.5.1.b.1, 2, and 3 require the ECCS pumps to develop a specified flow rate against a test line pressure greater than or equal to a specified gauge pressure. The developed head pressures in the proposed SR are equivalent to the test line gauge pressure in the CTS.	SR 3.5.1.4	4.5.1.b.1, 2, and 3
A.6	Allows deferral of the ADS valve actuation test until adequate steam pressure and flow are available. Footnote currently allows deferral until 12 hours after adequate reactor steam pressure is available, which implies adequate steam flow.	SR 3.5.1.7 Note	4.5.1.e.2.b) footnote *

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	Deletes ADS System response time test, since the response time for the ADS System is not assumed in any accident analysis, and their response time is listed as "N/A" in the USAR Table 7.3-18.	N/A	4.3.3.3
	3.5.2, ECCS-Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.5.2	3/4.5.2, 3/4.5.3, 4.3.3.3
A.2	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.5.2 ACTION D	3.5.2 Action b, 3.5.3 Action b
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary in lieu of current requirement to establish within 8 hours.	3.5.2 ACTION D	3.5.2 Action b, 3.5.3 Action b
A.4	Removes superfluous statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded", since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded.	N/A	3.5.2 footnote *, 3.5.3 footnote *
A.5	Rewords SRs such that the applicable SRs for low pressure ECCS systems and for HPCS are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1.	SR 3.5.2.3, SR 3.5.2.4, SR 3.5.2.5, SR 3.5.2.6	4.5.2.1
A.6	Moves CTS 3.5.3.a and associated Applicability, Action a, and CTS 4.5.3.1 to ITS 3.6.2.2.	3.6.2.2	3.5.3.a, 3.5.3.a Action a, 4.5.3.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	As an enhanced presentation of current intent, deletes CTS 4.5.3.2.b, which required periodic verification that the specified conditions of Applicability footnote * are met when the suppression pool is inoperable.	N/A	4.5.3.2.b
	3.5.3, RCIC SYSTEM		
A.1	Editorial changes, reformatting, and revised numbering.	3.5.3	3/4.7.4
A.2	Allows deferral of the RCIC flow test until adequate steam pressure and flow are available. Footnote currently allows deferral until 12 hours after adequate reactor steam pressure is available, which implies adequate steam flow.	SR 3.5.3.3, SR 3.5.3.4	4.7.4.b and 4.7.4.c.2 footnote *
A.3	Clarifies the intent of the RCIC pump flow rate surveillance to include the criteria of verifying pump flow against a system head corresponding to the reactor pressure.	SR 3.5.3.4	4.7.4.c.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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	CTS 4.6.1.1.b (including footnote **), relating to the position verification of PCIVs, CTS 3.6.1.2.c and 3.6.1.2.d (including the associated Actions), relating to the allowed leakage rates of MSIVs, secondary containment bypass leakage paths, purge supply valves, and valves in hydrostatically tested lines, and CTS 4.6.1.2.2 and 4.6.1.2.3, relating to testing of MSIVs, secondary containment bypass leakage paths, purge supply valves, and valves in hydrostatically tested lines, are moved to ITS 3.6.1.3. NOTE: 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	3.6.1.3	4.6.1.1.b including footnote **, 3.6.1.2.c and 3.6.1.2.d including the associated Actions, 4.6.1.2.2, 4.6.1.2.3 3.6.1.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	Deletes Surveillance Requirements 4.6.1.1.c and d, which cross reference to the requirements for air locks and the suppression chamber. Requirements for the air locks and the suppression chamber remain in ITS; however, providing a cross reference to them only adds confusion when evaluating compliance with Primary Containment OPERABILITY.	N/A	4.6.1.1.c, 4.6.1.1.d
A.7	Deletes the definition for L_a in CTS 3.6.1.2.a, since it is also currently included in the 10 CFR 50 Appendix J Testing Program Plan in CTS 6.8.4.f and will remain in ITS 5.5.12.	5.5.12	3.6.1.2.a
A.8	Primary containment structural integrity requirements specified in CTS 3.6.1.4 and 4.6.1.4.1 are presented as a supporting Surveillance for Primary Containment OPERABILITY. Additionally, details of the regulations are deleted from Technical Specifications.	SR 3.6.1.1.1	3.6.1.4, 4.6.1.4.1
A.9	The drywell-to-suppression chamber bypass leakage requirement of CTS 3.6.2.1.b is presented as a supporting Surveillance for Primary Containment OPERABILITY.	SR 3.6.1.1.2	3.6.2.1.b
A.10	Not used.		
A.11	CTS 4.6.2.1.e requires a drywell-to-suppression chamber bypass leak test to be performed in accordance with the criteria specified in the 10 CFR 50 Appendix J Testing Program Plan. CTS 4.6.2.1.e.3 states that the provisions of CTS 4.0.2 do not apply. This modification is unnecessary and is deleted since CTS 4.6.2.1.e must be performed on the same frequency as the 10 CFR 50 Appendix J Testing Program Plan. The provision that Specification 4.0.2 does not apply to the 10 CFR 50 Appendix J Testing Program is specified in CTS 6.8.4.f and inherent in ITS 5.5.12.	N/A	4.6.2.1.e.3

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	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
A.2	This change retains the requirement to meet the requirements of 10 CFR 50 Appendix J, as modified by approved exemptions (as described in the 10 CFR 50 Appendix J Testing Plan in Section 5.5 of the ITS), and eliminates the Technical Specification details that are also found in Appendix J. It retains, but moves to Section 5.5.12, requirements for the overall leakage rate (0.05La), the seal leakage rate (5 scfh), and test pressures (39.75 psig and 10 psig, respectively). A Surveillance will be maintained, which requires air lock leakage rate testing in accordance with the 10 CFR 50 Appendix J Testing Program Plan. In addition, CTS 4.6.1.3.d, 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. Three Notes are proposed. These Notes facilitate use and understanding of the intent of the ITS and are consistent with the intent of the CTS: 1) (For ACTIONS Note 3) considering the primary containment inoperable in the event air lock leakage results in the acceptance criteria being not met. 2) (For SR 3.6.1.2.1 Note 1) the overall air lock acceptance criteria when one air lock door is inoperable. Since the inoperability is known to be only affecting one door, the barrel and the other OPERABLE door are providing a sufficient containment barrier. Even though the overall test could not be satisfied, the Note clarifies the intent that the previous test <u>not</u> be considered "not met." 3) (For SR 3.6.1.2.1 Note 2) ensuring that the primary containment overall leakage is evaluated, against the acceptance criteria, every time the SR is performed. In addition, ITS 3.6.1.2 Required Action C.1 will ensure that the primary containment overall leakage is evaluated, against the acceptance criteria, if an air lock is inoperable.	5.5.12, SR 3.6.1.2.1 including Notes 1 and 2, 3.6.1.2 ACTIONS Note 3, 3.6.1.2 Required Action C.1	LCO 3.6.1.3.b, 4.6.1.3.a, b, and d

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.	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.3, Primary Containment Isolation Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.3	3/4.6.3, 4.3.7.7.b, 4.3.7.7.c, 3/4.4.7, 4.6.1.1.b including footnote **, 3/4.6.1.2, 3/4.6.1.7, 3.6.5.3 Actions a.1 and b.1 including footnote **, 6.8.4.f.3
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path," which is consistent with the intent of the CTS.	3.6.1.3 ACTIONS Note 2	3.6.3 Actions 3.4.7 Actions 3.6.1.7 Actions
A.3	Adds ITS ACTIONS Notes to facilitate the use and understanding of the intent for a system made inoperable by inoperable PCIVs; i.e., that the applicable ACTIONS for that system also apply. This requirement is currently located in CTS 3.6.3 Actions a.4 and b.2, but it does not cover all situations. Therefore, ITS 3.6.1.3 ACTIONS Note 3 has been added to cover all situations. ITS 3.6.1.3 ACTIONS Note 4 clarifies that these "systems" include the primary containment. In addition, Note 4 has been added to CTS 3.6.1.7 to ensure the proper actions are taken if purge valve leakage results in exceeding the overall Type A leakage limit.	3.6.1.3 ACTIONS Notes 3 and 4	3.6.3 Actions a.4 and b.2

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 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.6.3 Actions a.1 and b.1, 3.4.7 Action a.1.a
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.	LCO 3.0.4	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

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
A.12	The revised presentation of CTS 3.6.1.2 Action (Restore) d does not explicitly detail options to "restore...to OPERABLE status." This action is always an option, and is implied in all Actions. Omitting these actions from the ITS is editorial. 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 to within limits, as is required by CTS. This allowance (to allow restoration to be met by isolating the penetration with a device that meets the applicable leakage limits) is also provided in the STS Bases for the hydrostatically tested line leakage Action (STS 3.6.1.3 Action D.1 Bases). Therefore, this change is administrative.	3.6.1.3 Action D	3.6.1.3 Actions c & d

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	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.	3.6.1.5	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.		
A.3	The CTS requires verification that each drywell 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 drywell 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 drywell 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 drywell spray mode, the reference to check automatic valves has been deleted.	SR 3.6.1.6.1	4.6.2.2.a
	3.6.1.7, Suppression Chamber-to-Drywell Vacuum Breakers		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.7	3/4.6.4

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Adds ITS Note "Separate Condition entry is allowed for each suppression chamber-to-drywell vacuum breaker line," consistent with the intent of the CTS.	3.6.1.7 Conditions B and C Note	3.6.4 Action b Note
A.3	Specifically requires one vacuum breaker to be closed within 2 hours if both vacuum breakers in one line are found to be open.	3.6.1.7 ACTION C	3.6.4 Action b
A.4	Adds a Note to the Surveillance that verifies the vacuum breakers are closed that clearly states that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum.	SR 3.6.1.7.1 Note 2	4.6.4.a
	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 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.c, 3.6.2.1 ACTION B	3.6.2.1.a.2, 3.6.2.1.a.2.c), 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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	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 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
	3.6.2.3, RHR Suppression Pool Cooling		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.6.2.3
A.2	See M Table.		
A.3	The CTS requires verification that each suppression pool cooling 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 cooling 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 cooling, 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 cooling mode, the reference to check automatic valves has been deleted.	SR 3.6.2.3.1	4.6.2.3.a
	3.6.2.4, RHR Suppression Pool Spray		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.6.2.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	See M Table.		
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.	3.6.3.2	3/4.6.6.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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 *
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.	3.6.4.1	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 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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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
	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, 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.	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.	3.6.4.3	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 **

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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.	LCO 3.0.4	3.6.5.3 Action a.2
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 adsorbers 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, which is consistent with the intent of the CTS.	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, Service Water System and Ultimate Heat Sink		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.7.1.1
A.2	Provides changes in the NMP2 ITS consistent with the Technical Specifications change submitted to the NRC for approval per NMP2 letter NMP2L-1821 dated October 16, 1998.	3.7.1	3/4.7.1.1
A.3	Deletes specific allowance which permits the valves to be cycled intermittently, since LCO 3.0.5 provides this allowance.	N/A	3.7.1.1 Actions b and c footnote *
A.4	Deletes requirement for a LOGIC SYSTEM FUNCTIONAL TEST to be performed on the service water pump starting logic, because it is redundant to the other Surveillances in the AC Sources Specification and the Loss of Offsite Power Instrumentation Specification.	N/A	4.7.1.1.1.f.1
	3.7.2, Control Room Envelope Filtration (CREF) System		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.7.3
A.2	Moves the control room chiller system requirements to ITS 3.7.3.	3.7.3	3.7.3 (including footnote *), 4.7.3.a
A.3	Adds an ACTION to clarify current requirements by directing entry into LCO 3.0.3 if both CREF subsystems are inoperable and CREF System safety function is not maintained in MODE 1, 2, or 3.	3.7.2 ACTION D	3.7.3
A.4	Adds Required Actions to specifically identify methods of exiting the Applicability of the LCO if one CREF subsystem is inoperable, identical to those provided in CTS for both subsystems inoperable, which is consistent with the intent of the CTS.	3.7.2 Required Actions C.2.1, C.2.2, and C.2.3	N/A

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, which is consistent with the intent of the CTS.	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 incl footnote*
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

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, which is consistent with the intent of the CTS.	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	3.2.3 Action b

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1 when THERMAL POWER is 25% or more of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.7.7
A.4	Deletes the start and stop point of the response time, since they are duplicative of the TURBINE BYPASS SYSTEM RESPONSE TIME Definition.	N/A	4.7.7.b
A.5	Deletes statement that the provisions of Specification 3.0.4 are not applicable, since LCO 3.0.4 provides this allowance.	LCO 3.0.4	3.2.3 Action b
3.7.6, Spent Fuel Storage Pool Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.6	3/4.9.9
A.2	Clarifies that the Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool or when new fuel is being moved in the spent fuel storage pool with irradiated fuel assemblies in the spent fuel storage pool. This is appropriate because the purpose of the LCO is to ensure sufficient water is above the irradiated fuel assemblies to meet the assumptions of a fuel handling accident.	LCO 3.7.6	LCO 3.9.9
Current Specification 3/4.7.1.2, Plant Service Water System - Shutdown			
None	None	None	None
Current Specification 3/4.7.2, Revetment - Ditch Structure			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.7.5, Snubbers			
None	None	None	None
Current Specification 3/4.7.6, Sealed Source Contamination			
None	None	None	None
Current Specification 3/4.11.1.1, Concentration			
None	None	None	None
Current Specification 3/4.11.1.2, Dose			
None	None	None	None
Current Specification 3/4.11.1.3, Liquid Radwaste Treatment System			
None	None	None	None
Current Specification 3/4.11.2.1, Dose Rate			
None	None	None	None
Current Specification 3/4.11.2.2, Dose - Noble Gases			
None	None	None	None

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.11.2.3, Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form			
None	None	None	None
Current Specification 3/4.11.2.4, Gaseous Radwaste Treatment System			
None	None	None	None
Current Specification 3/4.11.2.5, Ventilation Exhaust Treatment System			
None	None	None	None
Current Specification 3/4.11.2.8, Venting or Purging			
None	None	None	None
Current Specification 3/4.11.3, Solid Radioactive Wastes			
None	None	None	None
Current Specification 3/4.11.4, Total Dose			
None	None	None	None
Current Specification 3/4.12.1, Monitoring Program			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.12.2, Land Use Census			
None	None	None	None
Current Specification 3/4.12.3, Interlaboratory Comparison Program			
None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.1	3/4.8.1.1
A.2	Moves the details in CTS LCO 3.8.1.1.b.1 relating to the required day tank level to ITS SR 3.8.1.4.	SR 3.8.1.4	LCO 3.8.1.1.b.1
A.3	Moves the technical content of the fuel oil storage and starting air requirements in CTS LCO 3.8.1.1.b.2, 3.8.1.1 Actions j, k, and l, 4.8.1.1.2.a.2, 4.8.1.1.2.a.7, 4.8.1.1.2.a.8, 4.8.1.1.2.b.2, 4.8.1.1.2.c, and 4.8.1.1.2.h to ITS 3.8.3.	3.8.3	LCO 3.8.1.1.b.2, 3.8.1.1 Actions j, k, and l, 4.8.1.1.2.a.2, 4.8.1.1.2.a.7, 4.8.1.1.2.a.8, 4.8.1.1.2.b.2, 4.8.1.1.2.c, 4.8.1.1.2.h
A.4	Adds a Note which, in the event the HPCS System is inoperable, allows the Division 3 DG to not be required to be OPERABLE. The effect is to continue to allow the ACTIONS to be applied to other AC sources inoperabilities, without the complexity of also having the AC Sources Specification address concurrent HPCS DG inoperability.	3.8.1 Applicability Note	N/A

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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.10	CTS requires the DG to reject the single largest load while maintaining the engine speed increase ≤ 75% of the difference between nominal speed and the overspeed trip setpoint or ≤ 15% of the nominal speed, whichever is less. These two possible values for the overspeed trip point are fixed by the design of the DG unit. The appropriate value (i.e., the most limiting, which is 64.5 Hz for Division 1 and 2 DGs and 66.75 Hz for Division 3 DG) is presented in proposed SR 3.8.1.7.	SR 3.8.1.7	4.8.1.1.2.e.2
A.11	CTS allows that, during the full load reject test, momentary transients of the bus load will not invalidate the test, providing for minor deviations from the singular fixed load value of the surveillance. ITS provides for this deviation by requiring the load to be equal to or greater than the rated load capacity.	SR 3.8.1.8	4.8.1.1.2.e.3 footnote **
A.12	Deletes the allowances of CTS 4.8.1.1.2.e.4.a) footnote ***, CTS 4.8.1.1.2.e.4.b) footnote *, CTS 4.8.1.1.2.e.5 footnote *, and CTS 4.8.1.1.2.e.6 footnote *, which allow certain tests to be preceded by DG warmup procedures and allow the DG to be gradually loaded to minimize mechanical stress and wear. CTS 4.8.1.1.2.e.4.a) and b) and CTS 4.8.1.1.2.e.6 require the DG to be automatically loaded; therefore, the allowances of the associated footnotes cannot be used. CTS 4.8.1.1.2.e.5 only requires a DG start and unloaded run; therefore, the associated footnote does not provide any needed allowance.	3.8.1	4.8.1.1.2.e.4.a) footnote ***, 4.8.1.1.2.e.4.b) footnote *, 4.8.1.1.2.e.5 footnote *, 4.8.1.1.2.e.6 footnote *
	3.8.2, AC Sources Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.2	3/4.8.1.2
A.2	Moves the details in CTS LCO 3.8.1.2.b.1 relating to the required day tank level to ITS SR 3.8.2.1.	SR 3.8.2.1	LCO 3.8.1.2.b.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Moves the technical content of the fuel oil storage and starting air requirements in CTS LCO 3.8.1.2.b.2, CTS 3.8.1.2 Actions d, e, and f, and certain requirements of CTS 4.8.1.2 to ITS 3.8.3.	3.8.3	LCO 3.8.1.2.b.2, 3.8.1.2 Actions d, e, and f, 4.8.1.2
A.4	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 (e.g., RHR-SDC could be inoperable), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a required division.	3.8.2 ACTION A Note	3.8.1.2 Actions
A.5	Deletes the reference in CTS 3.8.1.2 Action b to "take the ACTION required by Specification 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	3.8.1.2 Action b
A.6	For clarity, adds an exception to CTS 4.8.1.1.2.g (proposed SR 3.8.1.18), which is consistent with the intent of the CTS. This Surveillance is currently not required since it ensures all the DGs are OPERABLE (and no more than two DGs are required while in MODES 4 and 5 and handling irradiated fuel assemblies in the secondary containment).	SR 3.8.1.18	N/A
3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.3	3/4.8.1.1, 3/4.8.1.2

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

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	3/4.8.2.1, 3/4.8.2.2

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

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
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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.8.4.3 - Emergency Lighting System - Overcurrent Protective Devices			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.1	3/4.9.1
A.2	Moves the Refuel Position One-Rod-Out Interlock requirements to ITS 3.9.2.	3.9.2	3/4.9.1
A.3	Since one-rod-interlock requirements are moved to ITS 3.9.2, restrictions on equipment to be used during CORE ALTERATIONS in ITS 3.9.1 are rewritten, where the Applicability addresses the only CORE ALTERATIONS remaining, i.e., fuel movement.	3.9.1	LCO 3.9.1.b
A.4	Lists each actual refuel platform hoist in the Surveillance Requirement of ITS SR 3.9.1.1, versus the CTS requirement for the refuel platform "hoists" fuel loaded interlocks be Operable.	SR 3.9.1.1	LCO 3.9.1.b.3
A.5	Changed the Applicability to specify "during in-vessel fuel movement...", as well as specifying the equipment being used "...with equipment associated with the interlocks...", currently found in CTS LCO 3.9.1.b.	LCO 3.9.1	LCO 3.9.1
A.6	Deletes the Applicability footnote * cross reference to CTS 3.10.1 and 3.10.3, since the format of the ITS does not include providing cross references.	N/A	LCO 3.9.1
A.7	Deletes the Applicability footnote # statement that the reactor shall be maintained in Operational Condition 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	LCO 3.9.1
A.8	Moves, to ITS 3.10.2, the allowance to place the reactor mode switch in the Run or Startup/Hot Standby position to test switch interlock functions while in MODE 5.	3.10.2	4.9.1.2 footnote *

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.2, Refuel Position One-Rod-Out Interlock		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.2	3/4.9.1, 3/4.3.6
A.2	Deletes the requirement that the reactor mode switch shall be in the Shutdown or Refuel position, since it is an explicit part of the definition of MODE 5.	N/A	LCO 3.9.1
A.3	Moves the Refueling Equipment Interlock requirements ITS 3.9.1.	3.9.1	3/4.9.1
A.4	ITS Applicability reflects the current requirements for the one-rod-out interlock to be Operable in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn. The requirements of CTS 3.3.6, "Control Rod Block Instrumentation" Function 6.b "Reactor Mode Switch-Refuel Mode" are currently associated with the Refuel position one-rod-out interlock requirements of CTS 3.9.1.a and, therefore, the associated requirements are included with ITS 3.9.2.	LCO 3.9.2	LCO 3.9.1.a, 3.3.6 Function 6.b
A.5	Deletes the Applicability footnote * cross reference to CTS 3.10.1 and 3.10.3, since the format of the ITS does not include providing cross references.	N/A	LCO 3.9.1
A.6	Deletes the Applicability footnote # statement that the reactor shall be maintained in Operational Condition 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since the requirement is an explicit part of the definition of MODE 5.	N/A	LCO 3.9.1
A.7	Moves the Refuel Position One-Rod-Out Interlock requirements for MODES 3 and 4 to ITS 3.10.3 and 3.10.4, respectively. Moves, to ITS 3.10.2, the allowance to place the reactor mode switch in Run or Startup/Hot Standby to test the reactor mode switch interlock functions.	3.10.2, 3.10.3, 3.10.4	LCO 3.9.1, 4.9.1.2 footnote *

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Adopts in ITS 3.9.2 the more restrictive of differing current requirements: 1) the CTS 3.9.1 requirements concerning the one-rod-out interlock are adopted (except as described in Discussion of Change L.2) and the CTS 3.3.6 requirements are deleted; 2) the CTS 4.9.1.2 requirement concerning the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock is adopted (except as described in Discussion of Changes L.3 and L.4) and the CTS Table 4.3.6-1 requirement is deleted.	3.9.2 ACTION A, SR 3.9.2.2	3.3.6 Action b, Table 3.3.6-1 Action 62, 4.9.1.2 for Table 4.3.6-1 Function 6.b, 3.9.1 Action b, 4.9.2.2
A.9	Deletes reference to Trip Setpoints and Allowable Values since there are no Trip Setpoints and Allowable Values for the Reactor Mode Switch-Refuel Mode Function.	N/A	Table 3.3.6-2 Function 6.b
	3.9.3, Control Rod Position		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.3	3/4.9.3
A.2	1) Deletes 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. 2) Deletes the allowance that fuel can be loaded into the core when a rod is withdrawn under control of the reactor mode switch refuel position one-rod-out interlock, since the interlock will preclude fuel loading with a rod withdrawn.	N/A	LCO 3.9.3 footnote *
	3.9.4, Control Rod Position Indication		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.4	3/4.1.3.7
A.2	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 3.1.3.7

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 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Moves, to ITS 3.9.7, the requirements for handling new fuel assemblies and control rods.	3.9.7	3/4.9.8
A.3	Deletes "while in OPERATIONAL CONDITION 5" from the Applicability since the Specification deals only with handling irradiated fuel assemblies, and the only MODE where it is possible to move irradiated fuel assemblies within the reactor pressure vessel is MODE 5.	N/A	LCO 3.9.8
3.9.7, RPV Water Level New Fuel or Control Rods			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.7	3/4.9.8
A.2	Deletes "while in OPERATIONAL CONDITION 5" from the Applicability since the specification deals only with handling new fuel assemblies or control rods, and the only MODE where it is possible to move new fuel assemblies or handle control rods within the reactor pressure vessel is MODE 5.	N/A	LCO 3.9.8
3.9.8, Residual Heat Removal (RHR) High Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.8	3/4.9.11.1
A.2	Requires only that loading of irradiated fuel assemblies into the reactor pressure vessel be suspended versus CTS requirement that all operations involving an increase in the reactor decay heat load be suspended, since this is the only practical method of increasing the reactor decay heat load.	3.9.8 Required Action B.1	3.9.11.1 Action a
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (and completed as soon as possible) in lieu of current requirement to establish within 4 hours (and initiated as soon as possible).	3.9.8 Required Actions B.2, B.3, and B.4	3.9.11.1 Action a

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.9.8 Required Actions B.2, B.3, and B.4	3.9.11.1 Action a
3.9.9, Residual Heat Removal (RHR) Low Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.9	3/4.9.11.2
Current Specification 3/4.9.4, Decay Time			
None	None	None	None
Current Specification 3/4.9.5, Communications			
None	None	None	None
Current Specification 3/4.9.6, Refueling Platform			
None	None	None	None
Current Specification 3/4.9.7, Crane Travel - Spent Fuel Storage Pool			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, System Leakage and Hydrostatic Testing Operation		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.1	3/4.10.7, LCO 3.4.9.1, LCO 3.4.9.2
A.2	Not used.		
A.3	Consistent with the CTS 3.8.4.4 requirements, ITS 3.10.1 requires ITS 3.3.8.2, "RPS Electric Power Monitoring Logic" to be Operable during a system leakage or hydrostatic leak test to ensure the secondary containment isolation instrumentation that is required by ITS 3.10.1 can perform its intended function. ITS 3.10.1 ACTION A also requires the actions of ITS 3.3.8.2 to be taken when the assemblies are inoperable and proposed SR 3.10.1.1 requires the SRs of the applicable LCOs to be performed.	3.10.1	3.8.4.4
A.4	1) Adds an ITS 3.10.1 ACTIONS Note to clarify that the CTS 3.10.7 Action requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications (as shown in the current LCO, there are four potentially affected Specifications). 2) Adds ITS 3.10.1 Required Action A.1 Note to clarify that, upon entry into the ACTIONS of an affected Specification as required by the CTS 3.10.7 Action, if the affected Specifications ACTIONS state to be in MODE 4, this includes reducing average coolant temperature to ≤ 200°F.	3.10.1 ACTIONS Note, 3.10.1 Required Action A.1 Note	N/A
A.5	CTS 3.4.9.1 footnote , which exempts during hydrostatic and system leakage testing the requirement that an RHR shutdown cooling loop be in operation in Operational Condition 3 with the reactor vessel pressure less than the RHR cut-in permissive pressure, is deleted since the unit is not in Operational Condition 3 during these tests.	N/A	LCO 3.4.9.1 footnote

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.2, Reactor Mode Switch Interlock Testing		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.2	Table 1.2 footnote *, 4.9.1.2 footnote *
	3.10.3, Single Control Rod Withdrawal Hot Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.3	Table 1.2 footnote **, 3/4.9.1
A.2	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 3.10.3, is MODE 3 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	3.9.1 Action b
A.3	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 3.10.3.1	4.9.1.1, 4.9.1.2, 4.9.1.3
	3.10.4, Single Control Rod Withdrawal Cold Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.4	3/4.9.10.1, Table 1.2 footnotes ** and , 3/4.9.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes statements that require compliance with the Specification "until a control rod and control rod drive mechanism are reinstalled and the control rod is {fully} inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	LCO 3.9.10.1, 4.9.10.1
A.3	Since the MODE 4 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.1.b and 4.9.10.1.b references are redundant to the current and proposed requirements, and therefore, have been deleted.	N/A	LCO 3.9.10.1.b, 4.9.10.1.b
A.4	CTS 3.9.10.1.c.1 and CTS 3.9.10.1.c.2 refer to an exception to the current normal SDM requirements, which requires additional margin for immovable control rods. ITS 3.10.4 does not include the last half of existing c.1 or any of the existing c.2, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS and ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	N/A	LCO 3.9.10.1.c.1, LCO 3.9.10.1.c.2
A.5	The second option of CTS 3/4.9.10.1.d allows the four fuel assemblies surrounding the control rod or control rod drive mechanism to be removed from the core and/or reactor vessel. The CTS applies to both MODE 4 and MODE 5. During MODE 4, the optional requirement of CTS 3/4.9.10.1.d cannot be physically met, and therefore it is not included in ITS 3.10.4.	N/A	LCO 3.9.10.1.d, 4.9.10.1.d
A.6	Separates the CTS 3.9.10.1 Action into two ACTIONS, dependent on whether the affected control rod is insertable or not. ITS 3.10.4 ACTIONS are a more detailed presentation of the existing requirement to "initiate action to satisfy the above requirements."	3.10.4 ACTIONS	3.9.10.1 Action

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 4 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	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.2	Deletes statements that require compliance with the Specification "until a control rod and control rod drive mechanism are reinstalled and the control rod is {fully} inserted in the core," since this statement is fundamentally true for all Specifications and does not need to be stated in each individual Specification.	N/A	LCO 3.9.10.1, 4.9.10.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.1.b and 4.9.10.1.b references are redundant to the current and proposed requirements, and therefore, have been deleted.	N/A	LCO 3.9.10.1.b, 4.9.10.1.b
A.4	CTS 3.9.10.1.c.1 and CTS 3.9.10.1.c.2 refer to an exception to the current normal SDM requirements, which requires additional margin for immovable control rods. ITS 3.10.5 does not include the last half of existing c.1 or any of existing c.2, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS and ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	N/A	LCO 3.9.10.1.c.1, LCO 3.9.10.1.c.2
A.5	The optional requirement of CTS 3/4.9.10.1.d is not included in ITS 3.10.5, since during MODE 5, if it is desired to use the CTS 3/4.9.10.1.d allowance to remove the four fuel assemblies in lieu of inserting and disarming the control rods in a 5 x 5 array, this can be done provided the requirements of ITS 3.10.6 (CTS 3.9.10.2) are followed.	N/A	LCO 3.9.10.1.d, 4.9.10.1.d
A.6	Added a MODE 5 Applicability requirement in ITS 3.10.5 ("with LCO 3.9.5 not met") that is derived from the intent of CTS 3.9.10.1, which says "the associated control rod drive mechanism may be removed from ... the reactor pressure vessel..." When the control rod drive mechanism is removed, ITS 3.9.5, which requires all withdrawn control rods to be OPERABLE, is not met.	LCO 3.10.5	LCO 3.9.10.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	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.	3.10.5 Required Action A.2.1	N/A
	3.10.6, Multiple Control Rod Withdrawal Refueling		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.6	3/4.9.10.2
A.2	Deletes statements that require compliance with the Specification "until all control rods and control rod drive mechanisms are reinstalled and all control rods are inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	LCO 3.9.10.2, 4.9.10.2.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.2.b and 4.9.10.2.b references are redundant to the current and proposed requirements, and therefore, have been deleted.	N/A	LCO 3.9.10.2.b, 4.9.10.2.b
A.4	Deletes redundant references, since the current MODE 5 requirements for SHUTDOWN MARGIN (SDM) in CTS 3.1.1 and Surveillance testing in CTS 4.1.1 are adequate without explicit reference to them.	N/A	LCO 3.9.10.2.c, 4.9.10.2.c

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.	3.10.1 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 approved operation with only one rod pattern control system OPERABLE (RWM).	N/A	LCO 3.10.2, 4.10.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Includes the statement "The requirements of LCO 3.1.6, "Rod Pattern Control," may be suspended..." for use if the special test sequence deviates from the specified sequence of ITS 3.1.6. The proposed requirements also allow the RWM to be bypassed provided a second licensed operator or other qualified member of the technical staff verifies compliance with the prescribed sequence. Alternately, if the capability exists, ITS 3.10.7 provides an allowance to program the special test sequence into the RWM, with the RWM still considered OPERABLE, i.e., no exception to RWM OPERABILITY is needed.	LCO 3.10.7, LCO 3.10.7.a, LCO 3.10.7.b	LCO 3.10.2, 4.10.2.a.1
A.4	Revises Applicability to clarify actual applicable conditions for the proposed LCO; ITS Applicability includes "with LCO 3.1.6 not met" since this is the intent of when the LCO is to be used.	LCO 3.10.7	LCO 3.10.2
A.5	Changes actions since the RSCS is no longer required by the ITS. An ACTION has been added to require suspending the test and exception to the BPWS requirements. This is acceptable since CTS implies this new Action (the CTS 3.10.2 Action requires RSCS to be Operable, which essentially suspends the exception to the LCO).	3.10.7 ACTION A	3.10.2 Action
A.6	Adds Notes for clarity: 1) ITS SR 3.10.7.1 Note has been added clarifying that if ITS SR 3.10.7.2 is satisfied, then ITS SR 3.10.7.1 is not required to be met; and 2) ITS SR 3.10.7.2 Note has been added clarifying that if ITS SR 3.10.7.1 is satisfied, then ITS SR 3.10.7.2 is not required to be met.	SR 3.10.7.1 Note, SR 3.10.7.2 Note	N/A
3.10.8, SDM Test Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.8	3/4.10.3, 3.1.3.5 Action b, 3/4.3.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes the exceptions in CTS 3.10.3 to CTS 3.9.1 and CTS 3.9.3. The exception to CTS 3.9.1 is not needed since in the ITS the corresponding Specification no longer requires the reactor mode switch to be locked in Refuel at all times while in MODE 5. The exception to CTS 3.9.3 cannot be used, since CTS 3.10.3 precludes all other CORE ALTERATIONS from taking place.	N/A	LCO 3.10.3
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.3.a and 4.10.3.a references are redundant to the current and proposed requirements, and therefore, have been deleted.	N/A	LCO 3.10.3.a, 4.10.3
A.4	Delineates as specific restrictions for SDM in MODE 5 the current requirements for control rod coupling in MODE 5, since they are deleted as normal MODE 5 requirements. This change includes an appropriate ACTION and Surveillance.	LCO 3.10.8.c, 3.10.8 ACTION A, SR 3.10.8.5	3.1.3.6
A.5	Revises Applicability to clarify actual applicable conditions. The MODE 5 Applicability addition (with reactor mode switch in startup/hot standby position) is derived from the intent of CTS 3.10.3, which says "The provisions of...Table 1.2 may be suspended to permit the reactor mode switch to be in the Startup position..."	LCO 3.10.8	LCO 3.10.3
A.6	Adds Notes for clarity: 1) ITS SR 3.10.8.2 Note has been added clarifying that if ITS SR 3.10.8.3 is satisfied, then ITS SR 3.10.8.2 is not required to be met; and 2) ITS SR 3.10.8.3 Note has been added clarifying that if ITS SR 3.10.8.2 is satisfied, then ITS SR 3.10.8.3 is not required to be met.	SR 3.10.8.2 Note, SR 3.10.8.3 Note	N/A
A.7	Deletes CTS 3.1.3.5 Action b.2 which provides actions if multiple control rod scram accumulators are inoperable in MODE 5, since the multiple, inoperable withdrawn control rod accumulator requirement is already covered by ITS 3.9.5.	N/A	3.1.3.5 Action b.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Replaces the APRM Neutron Flux - Upscale, Setdown Function Surveillances with a generic Surveillance Requirement to perform the MODE 2 applicable SRs for ITS 3.3.1.1, Functions 2.a and 2.d of Table 3.3.1.1-1.	SR 3.10.8.1	Table 3.3.1-1 footnote k, Table 4.3.1.1-1 footnote n, 4.3.1.1, 4.3.1.2
A.9	Requires the APRM Functions to be Operable during shutdown margin demonstrations, but applies the MODE 2 requirements specified in ITS 3.3.1.1, RPS Instrumentation in lieu of the current MODE 5 requirements. The ITS 3.10.8 requirements, including the Actions and Surveillance Requirements, are equivalent to the current MODE 5 requirements.	LCO 3.10.8.a	Table 3.3.1-1 (including footnote (k)), Table 4.3.3.1-1 (including footnote (n))
Current Specification 3/4.10.1, Primary Containment Integrity			
None	None	None	None
Current Specification 3/4.10.4, Recirculation Loops			
None	None	None	None
Current Specification 3/4.10.5, Oxygen Concentration			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.10.6, Training Startups			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	4.0	5.0
A.2	Deletes the description of the exclusion area in CTS 5.1 since CTS Figure 5.1.1-1 (ITS Figure 4.1-1) has the identical information. Deletes CTS Figure 5.1.2-1, Low Population Zone, since a description of the area has been provided. The Exclusion Area and Site Area Boundary enclose the same areas, therefore, CTS Figures 5.1.1-1 and 5.1.3-1 are combined in proposed ITS Figure 4.1-1.	4.1.1, Figure 4.1-1	5.1, 5.1.2 Figures 5.1.1-1, 5.1.2-1, and 5.1.3-1
A.3	Deletes information about James A. Fitzpatrick Nuclear Power Plant (JAFNPP) and NMP1.	N/A	5.1, Figure 5.1.3-1 Notes a, c, d, f, and Additional Information
A.4	Adds information to better describe the fuel assemblies and control rods.	4.2.1	5.3.1
A.5	Deletes statement that the k_{eff} for new fuel stored in the new fuel storage racks shall not exceed 0.95 in the normal dry condition since it is redundant to the requirement to maintain $k_{eff} \leq 0.95$ in the fully flooded condition.	N/A	5.6.1.2
A.6	Moves the requirement to maintain limits on component cyclic and transient stresses to ITS 5.5.5.	5.5.5	5.7

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
A.1	Editorial changes, reformatting, and revised numbering.	5.1	6.1, 6.2, 6.5
A.2	Deletes the requirement for a management directive to be reissued annually to all station personnel stating that the Station Shift Supervisor - Nuclear is responsible for the control room command function.	N/A	6.1.2
A.3	Adds a clarifying statement to the CTS requirement that any modifications to structures, systems, and components and the safety evaluations be approved by the Plant Manager or Manager Technical Support and that the modifications to structures, systems, and components are those that affect nuclear safety.	5.1.1	6.5.2.3
	5.2, Organization		
A.1	Editorial changes, reformatting, and revised numbering.	5.2	6.2
A.2	Changes the title of the individual qualified to implement radiation protection procedures from Radiation Protection Technician to just describe the function; i.e., an individual qualified to implement radiation protection procedures. Changes the term "health physics" to "radiation protection" and "health physicists" to "key radiation protection personnel."	5.2.1.d, 5.2.2.d, 5.2.2.e	6.2.1.d, 6.2.2.c including footnote #, 6.2.2.h
A.3	Deletes footnotes that specifically disallow any shift crew position to be unmanned (including Radiation Protection) upon shift change because an oncoming shift crewman scheduled to come on duty is late or absent, since the requirement of these footnotes is covered by the wording of ITS 5.2.2.c and 5.2.2.d.	5.2.2.c, 5.2.2.d	Table 6.2.2-1 footnote (b), 6.2.2.c footnote *
A.4	Deletes statement that more operators can be assigned if needed, since the requirements of the minimum shift crew composition are specified and thus it is not necessary to specify whether the requirements may be exceeded.	N/A	Table 6.2.2-1 footnote (a)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Moves the requirements of CTS Table 6.2.2-1 footnote (d) to ITS 5.1.	5.1	6.2.2-1 footnote (d)
A.6	Replaces the person to whom the STA provides advisory technical support with a more generic statement; i.e., the words "Shift Supervisor" have been replaced with "shift supervision."	5.2.2.g	6.2.4
A.7	Modifies the specific STA requirements to reference the Commission Policy Statement on Engineering Expertise on Shift.	5.2.2.g	6.2.4
	5.3, Unit Staff Qualifications		
A.1	Editorial changes, reformatting, and revised numbering.	5.3	6.3
	5.4, Procedures		
A.1	Editorial changes, reformatting, and revised numbering.	5.4	6.8
A.2	Deletes specific requirements for refueling operations procedures and surveillance and test activity procedures of safety-related equipment, since these types of procedures are required by CTS 6.8.1.a, which references Regulatory Guide 1.33, Rev. 2.	5.4.1.a	6.8.1.c, 6.8.1.d, 6.8.1.h
A.3	Deletes specific requirements for procedures to implement the Emergency Plan and the Security Plan since they are also required by 10 CFR 50, Appendix E and 10 CFR 50.54(p).	N/A	6.8.1.e, 6.8.1.f
A.4	Deletes specific requirement for written procedures for ODCM implementation since it is covered by a more generic item, ITS 5.4.1.e, which requires this activity for all Programs and Manuals.	5.4.1.e	CTS 6.8.1.i

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.5, Programs and Manuals		
A.1	Editorial changes, reformatting, and revised numbering.	5.5	1.26, 4.0.5, 3.6.1.2, 3/4.6.1.3, 4.6.5.3, 4.7.3, 3.11.1.4, 3.11.2.6, 5.7, 6.5.2.11, 6.8.4, 6.14
A.2	Adds a statement of applicability of SR 3.0.2 to CTS 6.8.4.a (ITS 5.5.2), a statement of applicability of SR 3.0.3 to CTS 4.0.5 (ITS 5.5.6.c), and a statement of applicability of SR 3.0.2 and SR 3.0.3 to CTS 6.8.4.e (ITS 5.5.9).	5.5.2, 5.5.6.c, 5.5.9	6.8.4.a, 4.0.5, 6.8.4.e
A.3	Adds requirements for the Radioactive Effluent Controls Program (ITS 5.5.4) to be consistent with Generic Letter 89-01 and the revised 10 CFR 20 requirements. Modifies CTS 6.14, Offsite Dose Calculation Manual (ODCM) in ITS 5.5.1 to be consistent with Generic Letter 89-01 and the revised 10 CFR 20 requirements.	5.5.1, 5.5.4	6.14.2
A.4	Revises the wording to provide clarity.	5.5.9	6.8.4.e
A.5	Replaces the term "containment integrity" with "primary containment OPERABILITY."	5.5.12	6.8.4.f
A.6	Moves CTS 6.8.4.f.3, relating to the leakage rate acceptance criteria for hydrostatically tested lines, to ITS 3.6.1.3.	3.6.1.3	6.8.4.f.3
A.7	Deletes the statement that exempts the requirements of CTS SR 4.0.2 from applying to the frequencies specified in the 10 CFR 50 Appendix J Testing Program Plan; the statement is redundant since in the ITS, the ITS Section 3.0 requirements only applies to ITS Sections 3.1 through 3.10.	5.5.12	6.8.4.f

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Deletes footnotes which state that main steam isolation valve leakage is not part of Type C leakage limits, and is an exemption to 10 CFR 50 Appendix J, since the footnotes are redundant to Operating License Section 2.D.(ii), which identifies all exemptions to regulations.	N/A	CTS 3.6.1.2.b and Action b footnote *, 6.8.4.f.1 footnote *
A.9	Deletes requirement for the Offsite Dose Calculation Manual (ODCM) to be approved by the Commission prior to implementation, since it has already been approved by the NRC.	N/A	6.14.1
A.10	Changes the title of the Semiannual Radioactive Effluent Release Report to Radioactive Effluent Release Report to be consistent with the title used in ITS 5.6.	5.5.1.c.3	6.14.2.a
A.11	Identifies an additional definition of a frequency "Biennially or every two years" for the Inservice Testing Program.	5.5.6.a	N/A
A.12	Deletes redundant restatement that all applicable requirements must be met.	N/A	4.0.5.d
A.13	Places the filter testing requirements for the Standby Gas Treatment System and the Control Room Outdoor Air Special Filter Train have been placed in a program, with a general program statement added as ITS 5.5.7. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.7	4.6.5.3, 4.7.3

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.14	CTS for in-place charcoal adsorber testing of the Standby Gas Treatment (SGT) System (CTS 4.6.5.3.b.1) and the Control Room Outdoor Air Special Filter Train (CROASFT) (CTS 4.7.3.c.1) reference Regulatory Position C.5.d of Regulatory Guide (RG) 1.52, Revision 2, March 1978 as modified by footnote *. ITS 5.5.7.b references RG 1.52, Revision 2, and ANSI N510-1980. CTS for laboratory testing of the SGT System (CTS 4.6.5.3.b.2 and 4.6.5.3.c) and the CROASFT (CTS 4.7.3.c.2 and 4.7.3.d) reference the testing criteria of RG 1.52, Revision 2, Section C.6.a as modified by footnote *. ITS 5.5.7.c references ASTM D3803-1979 for a specific method and relative humidity. CTS for in-place HEPA filter testing of the SGT System (CTS 4.6.5.3.b.1) and the CROASFT (CTS 4.7.3.c.1) reference Regulatory Position C.5.a and C.5.c of RG 1.52, Revision 2, March 1978 as modified by footnote *. ITS 5.5.7.a references RG 1.52, Revision 2, and ANSI N510-1980.	5.5.7.a, 5.5.7.b, 5.5.7.c	4.6.5.3.b.1, 4.7.3.c.1, 4.6.5.3.b.2, 4.6.5.3.c, 4.7.3.c.2, 4.7.3.d
A.15	Places the outside temporary liquid radwaste tank requirements and offgas system hydrogen requirements in a program in Section 5.5, with a general program statement added. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.8	3.11.1.4, 3.11.2.6
A.16	Not used.		
A.17	Not used.		
A.18	Added statement that the testing of filter trains following painting, fire, or chemical release is only required if the painting, fire, or chemical release is significant.	5.5.7	4.6.5.3.b, 4.7.3.c
A.19	The voltage conditions at which the heaters are tested has been provided (i.e., degraded voltage conditions), and the proper wattage under degraded voltage conditions has been provided.	5.5.7.e	4.6.5.3.d.4, 4.7.3.e.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.6, Reporting Requirements		
A.1	Editorial changes, reformatting, and revised numbering.	5.6	Table 3.3.7.5-1, 6.9
A.2	Deletes subtitles of reports since each individual report is named rather than grouped under subtitles. In addition, the titles of Specifications that are already deleted in the CTS, have been deleted.	5.6	6.9, 6.9.1.5
A.3	Deletes the initial report requirements specified for the Annual Report, the Annual Radiological Environmental Operating Report, and the Radioactive Effluent Release Report, since these initial reports have been submitted on a one-time basis.	N/A	6.9.1.4, 6.9.1.7, 6.9.1.8
A.4	Adds another name (electronic dosimeter) for a new type of pocket dosimeter currently in use at NMP2 to estimate the whole body doses required to be reported. In addition, the reference to 10 CFR 20 has been modified to reflect the proper reference to 10 CFR 20, based on the recent revision to 10 CFR 20.	5.6.1	6.9.1.5.a and footnote *
A.5	Deletes the requirement to report the results of specific activity analysis in which the primary coolant exceeded CTS 3.4.5 limits, since the requirement is included in the 10 CFR 50.73 LER requirements to report fuel cladding failures that exceed expected values or that are caused by unexpected factors, i.e., being seriously degraded.	N/A	6.9.1.5.b
A.6	Deletes requirement to submit "Any other unit unique reports required on an annual basis," since these reports are not required by the CTS, but by other regulations.	N/A	6.9.1.5.d

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.7	Provides additional requirements for the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report, and places some details of the reports in the ODCM, based on Generic Letter 89-01 due to the removal of the Radiological Effluent Technical Specifications from the Technical Specifications.	5.6.2, 5.6.3	6.9.1.7, 6.9.1.8
A.8	Deletes CTS 6.9.1.9.a.2) since the APRM Flow Biased Simulated Thermal Power Upscale Allowable Value is retained in ITS Table 3.3.1.1-1, consistent with CTS Table 2.2.1-1. Therefore, the COLR will not provide this Allowable Value. The reference to the upscale trip setpoint for CTS 6.9.1.9.a.6) has been deleted since the ITS retains only the Allowable Value requirement.	N/A	6.9.1.9.a.2), 6.9.1.9.a.6)
A.9	Requires submittal of reports in accordance with 10 CFR 50.4, versus the CTS requirement that reports be submitted to several offices of the NRC.	5.6	6.9.1.9.d
A.10	Deletes duplicate requirement; i.e., the general statement to submit special reports within the time period specified for each report.	N/A	6.9.2
A.11	Deletes requirement for reporting the challenges to the main steam safety/relief valves on an annual basis since CTS also requires the report on a monthly basis.	5.6.4	6.9.1.5.c
5.7, High Radiation Area			
A.1	Editorial changes, reformatting, and revised numbering.	5.7	6.12
Current Specification 6.4, Training			
None	None	None	None

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 6.5, Review and Audit			
A.1	Moves the requirements of CTS 6.5.2.3 and 6.5.2.5 to ITS 5.1 while the requirements of CTS 6.5.2.11 are proposed to be moved to ITS 5.5.	5.1, 5.5	6.5.2.3, 6.5.2.5, 6.5.2.11
Current Specification 6.6, Reportable Event Action			
A.1	Removes Reportable Event notification requirements from the Technical Specifications, since these requirements are contained in 10 CFR 50.72 and 10 CFR 50.73.	N/A	6.6.a
Current Specification 6.7, Safety Limit Violation			
A.1	Removes the Safety Limit Violation requirements as they relate to NRC notification and permission to restart the unit, since the requirements are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73.	N/A	6.7.a, 6.7.b, 6.7.c, 6.7.d
Current Specification 6.10, Records Retention			
None	None	None	None
Current Specification 6.11, Radiation Protection Program			
None	None	None	None
Current Specification 6.13, Process Control Program			
None	None	None	None

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 6.15, Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems			
A.1	Places details in the ODCM or Process Control Program, as applicable, based on Generic Letter 89-01 which provides guidance on the removal of the Radiological Effluent Technical Specifications from the Technical Specifications. (See DOC R.1 for CTS 3/4.3.7.9, CTS 3/4.3.7.10, CTS 3/4.11, and CTS 3/4.12 for detailed technical discussion)	N/A	6.15

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	1) Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor," and 2) for the LOGIC SYSTEM FUNCTIONAL TEST, allows the signal to be injected "as close to the sensor as practicable" in lieu of "from the sensor."	1.1 CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.6, 1.22	3
L.2	CTS 1.10 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 Vl 56 No 98 May 21, 1991).	1.1 DOSE EQUIVALENT I-131 definition	1.10	3

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Deletes directions for the methods of restoring reactor vessel water level (manually initiate the ECCS, after depressurizing the reactor vessel, if required) to allow operator flexibility in determining the best method to restore the reactor vessel water level.	N/A	2.1.4	4

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	The phrase "unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements" was changed to "except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."	LCO 3.0.4	3.0.4	1
L.2	ITS LCO 3.0.5 is added to provide an exception to ITS LCO 3.0.2 for instances where restoration of inoperable equipment to an OPERABLE status could not be performed while continuing to comply with Required Actions. To allow the performance of Surveillance Requirements to demonstrate the OPERABILITY of the equipment being returned to service or to demonstrate the OPERABILITY of other equipment, which otherwise could not be performed without returning the equipment to service, an exception to these Required Actions is necessary.	LCO 3.0.5	N/A	4
L.3	The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions.	SR 3.0.2	4.0.2	6
L.4	ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.3.	SR 3.0.3	4.0.3	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.1, SHUTDOWN MARGIN			
L.1	Modifies the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal," to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality.	3.1.1 ACTION E	3.1.1 Action c	4
L.2	Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.1.1 Required Action E.2	3.1.1 Action c	4
L.3	Deletes CTS 4.1.1.b. The SDM limits adequately account for uncertainties and biases, and for fuel cycle changes.	N/A	4.1.1.b	3
	3.1.2, Reactivity Anomalies			
L.1	Increases the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours, since a determination and explanation of the cause of the anomaly would normally involve a fuel analysis department and the fuel vendor and obtaining the necessary input may require a time period much longer than one shift.	3.1.2 ACTION A	3.1.2 Action a	6
L.2	Replaces "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity.	SR 3.1.2.1	4.1.2.a	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Replaces the frequency "31 effective full power days" (approximately 734 MWD/T) with "1000 MWD/T during operations in MODE 1." Both Frequencies consider the relatively slow change in core reactivity with exposure and operating experience related to variations in core reactivity.	SR 3.1.2.1	4.1.2.b	3
3.1.3, Control Rod OPERABILITY				
L.1	Changes the actions for the local distribution of inoperable control rods: 1) adds a Note excluding actions above 10% power, since above 10% power, control rod worths that are of concern for the CRDA are not possible; 2) excludes actions for inoperable control rods whose position is in conformance with BPWS constraints, since below 10% power, the appropriate core reactivity and power distribution limits are controlled by maintaining control rod positions within the limits of BPWS and maintaining scram times limits; 3) Allows 4 hours versus current 1 hour to correct the situation prior to commencing a required shutdown, in recognition of the actual operational steps involved on discovery of inoperable control rod(s).	3.1.3 ACTION D	3.1.3.1 Actions a.1 and b.1.a)	4, 6
L.2	Extends the time for disarming a control rod from 1 hour to 2 hours in recognition of the potential for excessive haste required to complete this task since these processes require coordination of personnel and preparation of equipment, and potentially require anti-contamination "dress-out," in addition to the actual procedure of disarming the control rod.	3.1.3 Required Action A.2	3.1.3.1 Action a.1.b)	6
L.3	Deletes requirement for restoration of a stuck control rod within 48 hours. Adds a new Required Action to verify stuck control rod separation criteria since the Specification now allows continued operation with a stuck control rod.	3.1.3 Required Action A.1	3.1.3.1 Action a.2	4, 5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	Extends the time allowed to complete the insertion of all inoperable non-stuck control rods to 3 hours for all cases. The disarming is proposed to be extended to 4 hours - 1 hour beyond that allowed to insert in recognition of the potential for excessive haste required to complete this task.	3.1.3 ACTION C	3.1.3.1 Actions b.1 and b.2, 3.1.3.6 Action a	6
L.5	Extends verification of control rods to be non-stuck from 7 days to 31 days for control rods that are not fully withdrawn.	SR 3.1.3.3	4.1.3.1.2.a	3
L.6	Deletes daily notch test in the event power operation is continuing with an immovable control rod and the plant is operating at greater than the low power setpoint of the rod pattern control systems; only a single test once within 24 hours is required in ITS.	3.1.3 Required Action A.3	4.1.3.1.2.b	6
L.7	Extends the time to demonstrate SHUTDOWN MARGIN from 12 hours to 72 hours with a single control rod stuck in a withdrawn position.	3.1.3 Required Action A.4	4.1.1.c	6
L.8	Deletes the requirement for additional scram time surveillance testing in CTS 3.1.3.2 Action a.2 when three or more control rods exceed the maximum scram time. In addition, since the shutdown requirement ("otherwise, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.1.3.2 Action a.2 (since a control rod can always be declared inoperable), this part of CTS 3.1.3.2 Action a.2 has also been deleted.	N/A	3.1.3.2 Action a.2	4, 5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.9	Deletes coupling requirements during refueling (OPERATIONAL CONDITION 5) since only one control rod can be withdrawn from core cells containing fuel assemblies, and the probability and consequences of a single control rod dropping from its fully inserted position to the withdrawn position of the control rod drive are negligible. However, these requirements are retained for the proposed SDM testing in MODE 5 (ITS 3.10.8).	N/A	LCO 3.1.3.6, 3.1.3.6 Action b (including footnote *)	2
L.10	Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed. Also, because of the limited time allowed to recouple, removes restriction on the number of recoupling attempts.	ITS 3.1.3 Required Actions C.1 and C.2	3.1.3.6 Action a	4, 6
L.11	Deletes the requirements of CTS 3.1.3.6 Action a.1.b) since they are not necessary for ensuring recoupling of the control rod. SR 3.1.3.5 verifies a control rod does not go to the withdrawn overtravel position. After restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs (in this case SR 3.1.3.5) to be performed to demonstrate the OPERABILITY of the affected components.	N/A	3.1.3.6 Action a.1.b)	4
L.12	Deletes the requirements to verify control rod coupling by observing any indicated response of the nuclear instrumentation during withdrawal of a control rod, since a response to control rod motion on nuclear instrumentation is indicative that a control rod is following its drive, but gives no indication as to whether or not a control rod is coupled.	N/A	3.1.3.6 Action a.1.a), 4.1.3.6	3, 4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.13	CTS 3.1.3.7 Actions a.1.c) and a.1.d) provide a method for determining the position of a control rod whose position indicator is inoperable. This method requires determining position of the control rod by verifying that the indicators one notch "out" and one notch "in" are Operable, and verifying no rod drift alarm is annunciated every 12 hours. The 12 hour requirement to verify no rod drift alarm is being deleted. ITS SR 3.1.3.1 will continue to require the rod position to be determined every 24 hours.	N/A	3.1.3.7 Action a.1.d)	4
L.14	Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE by the performance of the control rod movement tests and the control rod coupling verifications, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SR 3.1.3.2, SR 3.1.3.3, and SR 3.1.3.5.	3.1.3	4.1.3.7.b, 4.1.3.7.c	3
3.1.4, Control Rod Scram Times				
L.1	Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell.	SR 3.1.4.4	4.1.3.2.a	3
L.2	CTS 4.1.3.2.b requires scram time testing for specifically affected individual control rods. Footnote "*" to this Surveillance allows Mode 2 to be entered prior to performing the scram time test, provided the test is performed prior to entering Mode 1. ITS SR 3.1.4.4 will allow entry into Mode 1 and require the test to be performed prior to exceeding 40% RTP.	SR 3.1.4.4	4.1.3.2.b footnote *	3

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 if not when <900 psig then all affected control rods are inserted.	3.1.5 Required Actions A.1, B.2.1, B.2.2, and C.2	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, 4
	3.1.6, Rod Pattern Control			
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.7, Standby Liquid Control System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillances: Verification of flow through one SLC subsystem from pump into reactor vessel; and verification that all heat traced piping between the storage tank and the pump suction valve is unblocked.	SR 3.1.7.8, SR 3.1.7.9	4.1.5.d.1, 4.1.5.d.3	10
L.1	Deletes the detail of the method for performing the surveillance to verify the appropriate amount of sodium pentaborate is in the SLC storage tank.	N/A	4.1.5.b.2	3
L.2	Deletes the requirement that the SLC flow verification and the heat traced piping is unblocked Surveillances be performed "during shutdown."	N/A	4.1.5.d	3
L.3	Deletes the requirement to demonstrate the heaters OPERABLE by verifying a temperature rise in the storage tank; the daily verification of the solution temperature provides an adequate check on the capability of the storage tank heaters to maintain solution temperature.	N/A	4.1.5.d.4	3
L.4	Modifies the SLC Volume vs. Concentration Figure to include available storage tank volumes in both the upper and lower end ranges and to delete information unrelated to meeting the LCO requirements.	Figure 3.1.7-1	Figure 3.1.5-1	1
	3.1.8, SDV Vent and Drain Valves			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillance: Verification that the vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset.	SR 3.1.8.3	4.1.3.1.4.a	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Actions to be taken when SDV valves are inoperable are modified: 1) to allow 7 days to isolate the associated SDV vent or drain line provided at least one valve in each line is OPERABLE; 2) to establish an 8 hour limit when both valves in a line are inoperable; 3) by adding a Note to allow periodic opening of the affected line for draining and venting of the SDV when the line is isolated due to an inoperable SDV valve; and 4) by adding the Note, "Separate Condition entry is allowed for each SDV vent and drain line."	3.1.8 ACTIONS Notes 1 and 2, 3.1.8 ACTIONS A and B	3.1.3.1 Actions d and e	4, 6
L.2	Deletes the requirement that SDV vent and drain valve closure and opening be tested following a scram performance from a normal control rod configuration of less than or equal to 50% rod density, since the surveillance can be satisfactorily performed at shutdown conditions. Additionally, performance of this surveillance during shutdown eliminates the need for the current Specification 4.0.4 not applicable statement.	N/A	4.1.3.1.4.a (including footnote **)	3
Current Specification 3/4.1.3.8				
L.1	Deletes the requirement for the CRD housing support to be in place, since it is included in the OPERABILITY requirements for control rods and is controlled by plant configuration management.	1.0 OPERABILITY definition, 3.1.3	3/4.1.3.8	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	Current Specification 3/4.1.4.2			
L.1	Deletes the Rod Sequence Control System (RSCS) requirements.	N/A	3/4.1.4.2	1

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
L.1	The requirement to verify APLHGR within limits within 12 hours of completion of a THERMAL POWER increase of ≥ 15% RTP is relaxed to once within 12 hours after ≥ 25%. In addition, the specific Specification 4.0.4 allowance of CTS 4.2.1.d is not necessary and has been deleted.	SR 3.2.1.1	4.2.1.b, 4.2.1.d	3
L.2	Deletes requirement to verify APLHGRs to be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.1.c	3
	3.2.2, MINIMUM CRITICAL POWER RATIO			
L.1	The requirement to restore MCPR to within required limits is proposed to be given a 2 hour completion time to allow appropriate actions to be evaluated by the operator and completed in a timely manner.	3.2.2 ACTION A	3.2.3 Action c	6
L.2	The requirement to verify MCPR within limit within 12 hours of completion of a THERMAL POWER increase of ≥ 15% RTP is relaxed to once within 12 hours after ≥ 25% RTP. In addition, the specific Specification 4.0.4 allowance of CTS 4.2.3.c is not necessary and has been deleted.	SR 3.2.2.1	4.2.3.a.2, 4.2.3.c	3
L.3	Deletes requirement to verify MCPR to be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.3.a.3	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.3, LINEAR HEAT GENERATION RATE			
L.1	The requirement to verify LHGRs within limit within 12 hours of completion of a THERMAL POWER increase of ≥ 15% RTP is relaxed to once within 12 hours after ≥ 25% RTP. In addition, the specific Specification 4.0.4 allowance of CTS 4.2.4.d is not necessary and has been deleted.	SR 3.2.3.1	4.2.4.b, 4.2.4.d	3
L.2	Deletes requirement to verify LHGRs to be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.4.c	3
	3.2.4, APRM Gain and Setpoint			
L.1	The requirement to verify the LCO requirements are met within 12 hours of completion of a THERMAL POWER increase of ≥ 15% RTP is relaxed to once within 12 hours after ≥ 25% RTP. In addition, the specific Specification 4.0.4 allowance of CTS 4.2.2.d is not necessary and has been deleted.	SR 3.2.4.1	4.2.2.b, 4.2.2.d	3
L.2	Deletes portion of footnote * to the CTS 3.2.2 ACTION that requires the adjusted APRM reading to not exceed 100% of RATED THERMAL POWER (RTP) and that requires a notice of adjustment is posted on the reactor control panel, since the RTP requirement is duplicative of the Operating License, and the posting of the adjustment in the control room is essentially an "operator aid."	N/A	3.2.2 Action footnote *	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Deletes the IRM, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 since during normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown Position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn.	N/A	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1, 11, and 12, Table 3.3.1-1 Actions 2, 7, and 8	1
L.2	CTS requirements for IRM Neutron Flux-High, IRM Inoperative, Reactor Mode Switch-Shutdown Position, and Manual Scram Functions to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS 3.3.1.1 action (ACTION H) requirements are included for consistency with the proposed ITS Applicabiltiy. Furthermore, CTS Action 9 requirements to lock the reactor mode switch in Shutdown are deleted since once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown.	Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1.a, 1.b, 11, and 12, Table 3.3.1-1 Actions 3 and 9	2
L.3	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	Table 2.2.1-1, including footnote *, and Table 3.3.1-1 Action 6, footnote *	1

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	Deletes the Main Steam Line Radiation-High RPS Function and its associated Action and Surveillance Requirements based on the BWR Owners' Group Licensing Topical Report NEDO-31400A dated July 9, 1987, the NRC Safety Evaluation Report for that document, and the information provided in this Discussion Of Change.	N/A	Tables 2.2.1-1, 3.3.1-1, and 4.3.1.1-1 Functional Unit 6, including Table 3.3.1-1 Note (d) and Table 4.3.1.1-1 Note (j), Table 3.3.1-1 Action 5	1
L.5	The CTS Scram Discharge Water Volume trip function Applicability is modified to replace operability requirements for Mode 5 with any control rod withdrawn with ITS operability requirements for MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS 3.3.1.1 action (ACTION H) requirements are included for consistency with the proposed ITS Applicabiltiy.	Table 3.3.1.1-1 Functions 7.a and 7.b, 3.3.1.1 ACTION H	Table 3.3.1-1 Functional Units 8.a and 8.b, including Note (h), Table 4.3.1.1-1 Functional Units 8.a and 8.b, including Note (m), Table 3.3.1-1 Action 3	2
L.6	Deletes the requirement to initiate a reduction in THERMAL POWER within 15 minutes since immediate power reduction may not always be the conservative method to assure safety.	N/A	Table 3.3.1-1 Action 6	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Extends the time to reach < 30% RTP from 2 hours to 4 hours.	3.3.1.1 Required Action E.1	Table 3.3.1-1 Action 6	6
L.8	ITS provide an exception to operability requirements for performing CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements for the IRM Neutron Flux-Upscale, IRM Neutron Flux- Inoperable and the APRM Neutron Flux-Upscale, Setdown Functions until 12 hours after entering MODE 2 from MODE 1.	SR 3.3.1.1.4 Note and SR 3.3.1.1.13 Note 2	4.3.1.1 for Table 4.3.1.1-1 Functional Units 1.a, 1.b, and 2.a	3
L.9	ITS provide an exception to operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER ≥ 25% RTP.	SR 3.3.1.1.3	Table 4.3.1.1-1 Note (g)	3
L.10	ITS provide an exception to operability requirements for performing Reactor Vessel Steam Dome Pressure-High and Reactor Vessel Water Level-Low, Level 3 Functions sensor response time testing and allows the design sensor response time to be used in place of test data.	SR 3.3.1.1.16 Note 2	4.3.1.3 for Table 4.3.1.1-1 Functional Units 3 and 4	3
3.3.1.2, SRM Instrumentation				
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the SRM CHANNEL CALIBRATION.	SR 3.3.1.2.7	4.3.7.6.a.2	10

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.3) if two or more required SRMs become inoperable. The words "or more" are added in the ITS to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed.	3.3.1.2 Condition A, 3.3.1.2 ACTION B	N/A	5
L.2	Deletes the CTS requirements to "lock" the mode switch in Shutdown.	N/A	3.3.7.6 Action b	8
L.3	ITS provide an exception to operability requirements for CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements for the SRMs until 12 hours after the IRMs are on Range 2 or below.	SR 3.3.1.2.6 Note, SR 3.3.1.2.7 Note 2	4.3.7.6.a.2, 4.3.7.6.b	3
L.4	Deletes the "prior to" frequency from CTS surveillances involving moving the reactor mode switch, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.1(ITS SR 3.0.1) and CTS 4.0.4 (ITS SR 3.0.4).	SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.4	4.3.7.6.b.1, 4.9.2.b.1, 4.9.2.c.1	3
L.5	Deletes the SRM alarm requirements, since the high flux alarm function of the SRMs does not relate to the OPERABILITY of the SRMs with respect to their capability to monitor neutron flux levels.	N/A	3.9.2.b	1
L.6	Adds a Note that eliminates requirements for SRMs outside the fueled region to be operable in MODE 5, during a spiral offload or reload since monitors in these positions are not capable of monitoring neutron flux. Similarly, SRM count rate requirements are deleted.	Table 3.3.1.2-1 Note b	4.9.2.a.3	1

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Revises the Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore, a Required Action is provided to immediately initiate action and continue attempts to insert all insertable control rods.	3.3.1.2 Required Action E.2	3.9.2 Action	4
L.8	Modifies the requirements to insert all insertable control rods in MODE 5 to only require those control rods in core cell containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.3.1.2 Required Action E.2	3.9.2 Action	4
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
L.4	CTS requirements for RWM channel functional testing are modified. Proposed ITS SRs extend the channel functional test to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM channel functional test after any control rod is withdrawn at ≤ 10% RTP in MODE 2 and after THERMAL POWER is ≤ 10% RTP in MODE 1.	SR 3.3.2.1.1, including Note, SR 3.3.2.1.2, including Note	4.1.4.1.a, b, and c	3
L.5	Deletes CTS Actions which require verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the surveillance requirement which requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN.	N/A	3.1.4.3 Action a.1, 4.1.4.3.b	3, 4
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.2.2.4	4.3.9.2 for CTS Table 4.3.9.1-1 Trip Function 1.a	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.2.2.3	4.3.9.1 for Table 4.3.9.1-1 Trip Function 1.a	10
L.1	Deletes the Feedwater System/Main Turbine Trip System trip setpoint and all references to it. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.9, Table 3.3.9-2,	1
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 Action 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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	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
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
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
L.3	The CTS requires a Channel Check to be performed for deenergized instruments during normal operation. No specific acceptance criteria applies to a Channel Check performed 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

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 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
L.1	Deletes trip setpoints and all references to the trip setpoints. The Allowable Value is the required limitation for the associated Function and this value is retained in the NMP2 ITS.	N/A	LCO 3.3.4.2, 3.3.4.2 Action a, Table 3.3.4.2-2, Table 3.3.4.2-1 footnote ** second sentence	1
L.2	CTS require a reduction in Thermal Power to < 30% RTP if the EOC-RPT instrumentation is not restored or if the MCPR penalty is not applied. ITS will allow removal of the associated recirculation pump fast speed breaker from service in place of reducing Thermal Power to < 30% RTP. In addition conforming changes are made to the ITS Applicability to require the EOC-RPT Instrumentation to be operable when Thermal Power is ≥ 30% RTP with any recirculation pump in fast speed.	3.3.4.1 Applicability, 3.3.4.1 Required Action C.1	3.2.2 Applicability, 3.2.2 Action c	5, 2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	When two turbine control valve channels or two turbine stop valve 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.	3.3.4.1 Required Action A.1	3.3.4.2 Action c.2	5
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	5, 6
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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 3.3.4.2.6	4.3.4.1.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.2.5	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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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	5, 6
L.4	The ITS allows removal of the associated recirculation pump breaker(s) from service in place of being in MODE 2 within 6 hours as required by the CTS, if the ATWS-RPT instrumentation is not restored within the allowed out-of-service times.	3.3.4.2 Required Action D.1	N/A	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.5.1, ECCS Instrumentation			
LB.1	The CTS allowance to delay entering the associated Action statement when performing required Surveillances is clarified to allow the CTS Functions to be inoperable and delay entering the associated Actions for 6 hours, regardless of the remaining ECCS initiation capability of the Function. For these three Functions, loss of one channel results in a loss of HPCS initiation capability.	3.3.5.1 Surveillance Requirements Note 2	Table 3.3.3-1 footnote (a) for Trip Functions C.1.f, C.1.g, and C.1.h	6
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, 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)	5, 6

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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.1.h, including Note (a)	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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 certain 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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
L.12	In the CTS, ADS manual initiation channel(s) inoperability result in all ADS valves being decalred inoperable after an 8 hour repair time expires. A unit shutdown is required with all ADS valves inoperable. ITS provides a 72 hour or 7 day repair time, depending on whether or not both HPCS and RCIC are operable.	3.3.5.1 Action G	Table 3.3.3-1 Action 35 3.5.1 Action e.2	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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	5
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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	CTS requires a unit shutdown when a Reactor Vessel Water Level-Low Low, Level 2 channel is not placed in trip. This Function actuates Reactor Water Cleanup (RWCU) System valves as well as other primary containment isolation valves. The ITS allows isolation of the affected penetration instead of requiring a unit shutdown, when only the RWCU System valves are affected.	3.3.6.1 ACTION F	Table 3.3.2-1 Action 20	5
L.4	CTS requires a unit shutdown to MODE 4 when a Reactor Vessel Water Level-Low, Level 3 channel is not placed in trip. This Function actuates RHR SDC System valves. The ITS allows isolation of the affected penetration instead of requiring a unit shutdown to MODE 4 (i.e., the unit is allowed to remain in MODE 3). However, this action will result in a loss of shutdown cooling, and could result in a more significant safety problem than if the valves were left open with inoperable channels. Therefore, the ITS Actions require action to be immediately initiated to restore the channel(s) to OPERABLE status.	3.3.6.1 Required Actions J.1 and J.2	Table 3.3.2-1 Action 20	5
L.5	The MODE 1 and 2 Applicability requirements for CTS Reactor Vessel Water Level-Low, Level 3, RHR Equipment Area Temperature-High, Reactor Building Pipe Chase Temperature-High, and Reactor Building Temperature-High have been deleted for the RHR SDC System (Group 5) valves.	N/A	Tables 3.3.2-1 and 4.3.2.1-1 Trip Functions 1.a.3), 1.f, 1.k, and 1.l	2

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.6	Deletes the Main Steam Line Radiation-High isolation of valve groups 1 (MSIV and MSL drains) and 2 (Recirculation System sample valves) and it is associated Action and Surveillance Requirements based on the BWR Owners' Group Licensing Topical Report NEDO-31400A dated July 9, 1987.	N/A	Tables 3.3.2-1, 3.3.2-2 (including Footnote **), and 4.3.2.1-1 Trip Function 1.c.1, Table 3.3.2-4 Isolation Signal C	1
L.7	The CTS Action required when Trip Functions 1.h 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
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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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
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 place of test data.	SR 3.3.6.1.7 Note	4.3.2.3 for Table 4.3.2.1-1 Trip Functions 1.a.1), 1.c.2), and 1.c.3)	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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

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 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
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
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION of the Secondary Containment isolation instrumentation and Standby Gas Actuation Instrumentation.	SR 3.3.6.2.4	4.3.2.1 for Table 4.3.2.1-1 Trip Functions 1.a.2), 1.b, 3.a, and 3.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, Table 3.3.2-2	1
L.2	Deletes the CTS requirement to shutdown with inoperable Reactor Vessel Water Level-Low Low, Level 2 or Drywell Pressure-High Functions and provides alternate actions to place associated equipment in a condition consistent with the intended function of the actuation instrumentation. Alternatively, the associated isolation valves or SGT Subsystem may be declared inoperable.	3.3.6.2 ACTION C	Table 3.3.2-1 Action 20	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Isolation of secondary containment on Reactor Vessel Water Level-Low Low, Level 2 is required by CTS to be Operable during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS.	N/A	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 1.a.2 Applicability	2
L.4	ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve (SCIV) or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.3 entry would be required, since no further Actions are provided.	3.3.6.2 Required Actions C.1.2 and C.2.2	Table 3.3.2-1 Action 27	4, 5
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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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, 5, 3
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.1	The CTS requires a channel to be placed in trip within 24 hours when one main control room ventilation radiation monitor in one or both trip systems is inoperable. Since no actions are provided if the channel(s) are not tripped, CTS 3.0.3 would be required to be entered. In place of requiring a unit shutdown, the ITS will allow the associated CREF subsystem to be placed in operation or declared inoperable within 1 hour. The CTS also requires placing the CREF System in operation within 6 hours when two main control room ventilation radiation monitors in one trip system are inoperable and not restored within 7 days, and requires placing the CREF System in operation within 1 hour when two main control room ventilation radiation monitors in both trip systems are inoperable. Since no actions are provided if the CREF System is not placed in operation, CTS 3.0.3 would be required to be entered. In place of requiring a unit shutdown, the ITS will allow the associated CREF subsystem to be declared inoperable within 1 hour.	3.3.7.1 ACTION D	Table 3.3.7.1-1 Actions 74.a, 74.b, and 74.c	5

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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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	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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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	3.8.4.4 Applicability	2

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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
L.5	The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS UPS is not removed from service (which de-energizes the associated bus). Thus, CTS 3.0.3 is required to be entered. However, since CTS 3.0.3 is not applicable in Modes 4 and 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 new ACTIONS if the Required Actions of Condition A or B are not met in MODES other than MODES 1, 2, and 3. The ITS requires action to be initiated to restore one EPA to OPERABLE status for each RPS logic bus or to isolate the Residual Heat Removal (RHR) Shutdown Cooling (SDC) System; requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies; and requires action to be taken to isolate the affected secondary containment penetration flow paths and start the associated SGT and CREF subsystems, or to declare the associated SCIVs, SGT subsystems, and CREF subsystems inoperable.	3.3.8.2 ACTIONS D, E, and F	N/A	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.3.8.3, RPS Electric Power Monitoring-Scram Solenoids				
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 (scram solenoids).	SR 3.3.8.3.3	4.8.4.5.b	10
LE.1	Relocation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION requirement of the RPS Electric Power Monitoring instrumentation.	SR 3.3.8.3.2	4.8.4.5.b	10
L.1	ITS changes the RPS scram solenoid bus EPAs Applicability from at all times 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).	3.3.8.3 Applicability	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	Overvoltage and undervoltage trip setpoints are replaced with the Allowable Values.	SR 3.3.8.3.2	4.8.4.5.b.1 and 2	1

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
Current Specification 3/4.3.7.1, Radiation Monitoring Instrumentation				
None	None	None	None	None
Current Specification 3/4.3.7.2, Seismic Monitoring Instrumentation				
None	None	None	None	None
Current Specification 3/4.3.7.7, Traversing In-Core Probe System				
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.3.7.8, Loose Part Detection System				
None	None	None	None	None
Current Specification 3/4.3.7.9, Radioactive Liquid Effluent Monitoring Instrumentation				
None	None	None	None	None
Current Specification 3/4.3.7.10, Radioactive Gaseous Effluent Monitoring Instrumentation				
None	None	None	None	None
Current Specification 3/4.3.9, Plant Systems Actuation Instrumentation				
None	None	None	None	None

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions or relaxation of requirements to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Requirement from 18 months to 24 Months

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 3.4.2.1, SR 3.4.2.2	4.4.1.1.3.a, 4.4.1.1.3.b	10

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

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	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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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 to be operable. The drain tank fill rate monitoring system was deleted in LCO 3.4.7. The other 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 3.4.7.4, SR 3.4.7.5	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
L.2	Adds a Note that LCO 3.0.4 is not applicable for the condition of the drywell floor drain tank fill rate monitoring system inoperable or the required drywell atmospheric monitoring system inoperable.	3.4.7 ACTIONS A and B Notes	N/A	7
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 Leakage Detection System channel is OPERABLE.	3.4.7 Surveillance Requirements Note	N/A	6
3.4.8, RCS Specific Activity				
L.1	Deletes requirement to maintain specific activity $\leq$ 100/E-bar μCi/gm.	N/A	LCO 3.4.5.b, 3.4.5 Actions a.2 and b, Table 4.4.5-1 Items 1 and 3	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Changes the Applicability from Operating Conditions 1, 2, 3, and 4 to MODES 1, 2, and 3 with any main steam line not isolated (i.e., those conditions which represent a potential for release of significant quantities of radioactive coolant to the environment.) Actions are modified to reflect the new Applicability, and an option for exiting the applicable MODES is provided for cases where isolation is not desired.	LCO 3.4.8, 3.4.8, ACTION B	LCO 3.4.5, 3.4.5 Actions a and b, Table 4.4.5-1 Item 4	2
L.3	Adds a Note to CTS 3.4.5 Action a that LCO 3.0.4 is not applicable during the first 48 hours of failure to meet the LCO limit provided the specific activity is $\leq$ 4.0 μCi/gm DEI.	3.4.8 ACTION A	N/A	7

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.4.9, RHR Shutdown Cooling System - Hot Shutdown				
L.1	Adds a Note to CTS 3.4.9.1 and CTS 4.4.9.1 making LCO 3.0.4 and SR 3.0.4 not applicable to provide the necessary time to place the RHR shutdown cooling system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed into service until the suction valves high pressure closure interlock is cleared.	3.4.9 ACTIONS Note 1, SR 3.4.9.1 Note	N/A	7
L.2	CTS 3.4.9.1 footnote * allows one RHR shutdown cooling loop to be inoperable for 2 hours, provided the other loop is OPERABLE and in operation. CTS 3.4.9.1 footnote ** allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements in CTS footnote * and ** are changed to delete the "provided" requirements.	LCO 3.4.9 Notes 1 and 2	3.4.9.1 footnotes * and **	1
3.4.10, RHR Shutdown Cooling System - Cold Shutdown				
L.1	CTS 3.4.9.2 footnote * allows one RHR shutdown cooling loop to be inoperable for 2 hours, provided the other loop is OPERABLE and in operation. CTS 3.4.9.2 footnote ** allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements in CTS footnote * and ** are changed to delete the "provided" requirements.	LCO 3.4.10 Notes 1 and 2	3.4.9.2 footnotes * and **	1
3.4.11, RCS Pressure and Temperature (P/T) Limits				
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.4.12, Reactor Steam Dome Pressure				
L.1	Slightly increases the reactor steam dome pressure limit to allow pressure to be equal to 1035 psig and still be within the limit, since the safety analysis described in the USAR assumes the initial reactor steam dome pressure is 1035 psig, not less than 1035 psig.	LCO 3.4.12, SR 3.4.12.1	LCO 3.4.6.2, 4.4.6.2	1
Current Specification 3/4.4.4, Chemistry				
None	None	None	None	None
Current Specification 3/4.4.8, Structural Integrity				
None	None	None	None	None

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.1, ECCS-Operating			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillances: Verification that each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; verification each required ADS valve actuator strokes when manually actuated; verification that the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.	SR 3.5.1.5, SR 3.5.1.6, SR 3.5.1.7, SR 3.5.1.8	4.5.1.c, 4.5.1.d, 4.5.1.e.2.a), 4.5.1.e.2.b), 4.3.3.3	10
L.1	Reduction of the number of ADS valves required to be OPERABLE from seven to six. Associated Actions and Surveillance Requirement also revised to reflect the change.	LCO 3.5.1, 3.5.1 ACTIONS E and G, SR 3.5.1.7	LCO 3.5.1.a.3 and 3.5.1.b.2, 3.5.1 Actions e.1 and e.2, 4.5.1.e.2.b)	1
L.2	Relaxation in pressure at which ADS is required to be OPERABLE, from 100 psig to 150 psig.	LCO 3.5.1, 3.5.1 ACTION G	3.5.1, 3.5.1 Actions e.1 and e.2	2
L.3	Elimination of requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv).	N/A	3.5.1 Action f	9
L.4	Addition of two new Actions: (1) for the condition of one required ADS valve inoperable coincident with one low pressure ECCS injection/spray system (ITS 3.5.1 ACTION F); and (2) for the condition of HPCS inoperable coincident with one low pressure coolant injection subsystem (covered by ITS 3.5.1 ACTION C). ITS 3.5.1 ACTIONS C and F require a Completion Time of 72 hours, whereas CTS requires entry into LCO 3.0.3 for these conditions.	3.5.1 ACTIONS C and F	N/A	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	Deletion of the ADS accumulator backup compressed gas system pressure alarm instrumentation and the supporting Surveillance Requirements, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	4.5.1.e.1, 4.5.1.e.2.c)	3
L.6	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirements that verify each ECCS subsystem and ADS actuates on a "simulated" automatic initiation signal.	SR 3.5.1.5, SR 3.5.1.6	4.5.1.c, 4.5.1.e.2.a	3
L.7	Addition of an alternate approach to ADS valve testing, whereby the disk is not lifted off its seat at power.	SR 3.5.1.7	4.5.1.e.2.b)	3
L.8	Addition of a Note that exempts the ECCS instrumentation associated with each ECCS injection/spray subsystem from response time testing and allows the design instrumentation response time to be used in the determination of the ECCS RESPONSE TIME.	SR 3.5.1.8	4.3.3.3	3
3.5.2, ECCS-Shutdown				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the ECCS response time test surveillance.	SR 3.5.2.7	4.3.3.3	10
L.1	Deletion of requirements to: 1) suspend CORE ALTERATIONS when both required ECCS subsystems are inoperable, and 2) suspend CORE ALTERATIONS when the suppression pool water level requirement is not within limits.	N/A	3.5.2 Action b, 3.5.3 Action b	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Decreases suppression pool water level requirement for MODES 4 and 5 from 199 ft 6 inches to 195 ft. In MODES 4 and 5, the suppression pool is not needed to condense the steam released during a LOCA. 195 ft is based on ensuring adequate net positive suction head and vortex prevention for all the ECCS pumps, and provides an additional volume for a recirculation volume. In addition, the redundant volume requirement in cubic feet is deleted, leaving only the equivalent volume in feet.	SR 3.5.2.1, SR 3.5.2.2.a	LCO 3.5.3.b	1
L.3	CTS 3.5.3 Action b requires suspension of OPDRVs if the suppression pool water level is not within limits or if the suppression pool is drained and the requirements of CTS 3.5.3.b are not met. Since the HPCS can take a suction on the CST if CST level is within limits, CTS 3.5.3 Action b is revised as shown in ITS 3.5.2 ACTION A to reflect that only one ECCS subsystem is inoperable. With only one inoperable, CTS allows 4 hours prior to requiring OPDRVs to be suspended. Therefore, ITS 3.5.2 Required Action A.1 has been added to provide 4 hours to restore the inoperable ECCS subsystem to OPERABLE status consistent with CTS.	3.5.2 Required Action A.1	LCO 3.5.3.b, 3.5.3 Action b	4
L.4	Deletes 1) the CTS 3.5.3.b.2 requirement to "lock" the reactor mode switch in Shutdown or Refuel when the suppression pool is not within the required limit or is drained, and 2) the CTS 3.5.3 Action b requirement to "lock" the reactor mode switch in Shutdown when the suppression pool water level is not within the required limit or is drained and the CTS 3.5.3.b requirements not met. The position of the reactor mode switch is controlled by the MODES definition Table.	N/A	LCO 3.5.3.b.2, 3.5.3 Action b	8

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	Addition of a Note that exempts the ECCS instrumentation associated with each ECCS injection/spray subsystem from response time testing and allows the design instrumentation response time to be used in the determination of the ECCS RESPONSE TIME.	SR 3.5.2.7	4.3.3.3	3
	3.5.3, RCIC System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillances: RCIC system functional test and the RCIC low pressure flow test.	SR 3.5.3.4, SR 3.5.3.5	4.7.4.c.1, 4.7.4.c.2, 4.7.4.c.3	10
L.1	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirement that verifies the RCIC subsystem actuates on a "simulated" automatic initiation signal. This allows actual automatic system initiations to fulfill the SR.	SR 3.5.3.5	4.7.4.c.1	3

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.1, Primary Containment			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing CTS 4.6.2.1.e.2 (drywell-to-suppression chamber bypass leakage test) and 4.6.2.1.f (drywell-to-suppression chamber vacuum breaker bypass leakage path test).	SR 3.6.1.1.2, SR 3.6.1.1.3	4.6.2.1.e.2, 4.6.2.1.f	10
L.1	Deletes the special reporting requirements currently required when abnormal degradation of the primary containment structure is detected during visual inspection. Reporting will now only be required when degradation of the primary containment structure is significant enough to warrant an LER per 10 CFR 50.73.	N/A	4.6.1.4.2	9
L.2	In the ITS, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. The CTS only restricts heating up reactor coolant above 200°F (i.e., entry into MODE 3). With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS 3.6.2.1 does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment is inoperable.	3.6.1.1 Action A	3.6.2.1 Action e	6
L.3	Deletes the specific 18 month Frequency in CTS 4.6.2.1.d (visual inspection of the exposed accessible interior and exterior surfaces of the suppression chamber), which effectively changes the actual test requirement Frequency from 18 months to the Frequency specified in CTS 4.6.1.4.1 and 10 CFR 50 Appendix J (i.e., at a Frequency that is nominally 40 months).	N/A	4.6.2.1.d	3

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 rate 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	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	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	N/A	4

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	The CTS requires verifying the air lock door seal leakage rate is within limit once per 7 days when the air lock door is opened for multiple entries. The ITS will allow this test to be performed every 30 days (as described in Regulatory Guide 1.163, which is required to be met in ITS 5.5.12).	SR 3.6.1.2.1, 5.5.12	4.6.1.3.a.1	3
L.6	Change the Frequency for the air lock interlock test from prior to performing CTS 4.6.1.3.a to 24 months.	SR 3.6.1.2.2	4.6.1.3.c and Footnote †	3
3.6.1.3, Primary Containment Isolation Valves				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing CTS 4.6.3.2 (automatic PCIV actuation test), 4.6.3.4 (EFCV actuation test), 4.6.3.5.b (TIP squib valve initiation test), and 4.3.7.7.c (TIP squib valve initiation test).	SR 3.6.1.3.8, SR 3.6.1.3.9, SR 3.6.1.3.10	4.6.3.2, 4.6.3.4, 4.6.3.5.b, 4.3.7.7.c	10
L.1	CTS 3.6.3 Action a requires an inoperable PCIV to be restored or the affected penetration isolated in 4 hours. CTS 3.4.7 Action a also requires an inoperable MSIV (which is a PCIV) to be restored or the affected penetration isolated in 4 hours. The ITS allows 8 hours to isolate the affected penetration when an MSIV is inoperable and Action C allows 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose piping communicates with the suppression pool and is expected to remain submerged during the accident (a closed system as defined in the USAR), and only one PCIV.	3.6.1.3 Required Actions A.1 and C.1	3.6.3 Action a, 3.4.7 Action a	6

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 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

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
L.14	Not used.			

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
L.17	Not used.			
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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
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 3.6.1.6.3	4.6.2.2.c	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.1.7, Suppression Chamber-to-Drywell Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.25 psid.	SR 3.6.1.7.3	4.6.4.b.3.a)	10
L.1	Deletes the vacuum breaker position indication instrumentation in CTS 3.6.4 Action c, CTS 4.6.4.b.2, and CTS 4.6.4.b.3.b), 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	3.6.4 Action c, 4.6.4.b.2, 4.6.4.b.3.b)	1, 3, 4
L.2	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.7.1	4.6.4.a	3
L.3	The requirement to cycle the vacuum breakers after an SRV lift is revised from 2 hours after the lift to 12 hours after the lift.	SR 3.6.1.7.2	4.6.4.b	3
L.4	Adds a Note stating that the vacuum breakers can be opened when performing required Surveillances. CTS requires that the vacuum breakers be closed at all times; with no allowance for opening during performance of required Surveillances.	SR 3.6.1.7.1 Note 1	4.6.4.a	3
3.6.2.1, Suppression Pool Average Temperature				
L.1	Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one residual heat removal loop in the suppression pool cooling mode).	N/A	3.6.2.1 Action b.2	4

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 Actions A.1 and D.2 SR 3.6.2.1.1	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.2.4, RHR Suppression Pool Spray			
L.1	Deletes the requirement to circulate suppression pool spray water through the heat exchangers since cooling the suppression pool spray water is unnecessary.	N/A	3.6.2.2.b, 4.6.2.2.b	1
	3.6.3.1, Primary Containment Hydrogen Recombiners			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing a resistance to ground test for each heater phase.	SR 3.6.3.1.2	4.6.6.1.b.2	10
L.1	Adds a statement that LCO 3.0.4 is not applicable for the condition of one hydrogen recombiner inoperable.	3.6.3.1 ACTION A Note	N/A	7
L.2	Adds an ACTION for the condition of both containment hydrogen recombiners inoperable, with a 7 day Completion Time to restore at least one of the recombiners to OPERABLE status before requiring a shutdown provided the hydrogen control function is maintained. CTS provides no actions for this condition, requiring a 3.0.3 entry.	3.6.3.1 ACTION B	3.0.3	4, 6
L.3	Relaxation of Surveillance Frequency from 6 months to 24 months for the functional test of the hydrogen recombiners.	SR 3.6.3.1.1	4.6.6.1.a	3
L.4	Deletes the CHANNEL CALIBRATION surveillance for the hydrogen recombiner instrumentation and control circuits.	N/A	4.6.6.1.b.1	3
	3.6.3.2, Primary Containment Oxygen Concentration			
None	None	None	None	None

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	3, 10
	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 (note) for intermittently opening, under administrative control, closed secondary containment isolation valves (SCIVs).	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

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 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies that each subsystem actuates on an automatic initiation "test" signal.	SR 3.6.4.3.3	4.6.5.3.d.2	3
L.2	The CTS requires an 18 month check that the SGT System decay heat removal air inlet valves are closed and can be manually opened. The ITS will only require verification that the valves can be manually opened; the check that the valves be closed is not included in the ITS.	SR 3.6.4.3.4	4.6.5.3.d.3	3

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.7.1, Service Water System and Ultimate Heat Sink				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following surveillances: SW system functional test; and, the Intake Deicing Heater System resistance checks.	SR 3.7.1.7, SR 3.7.1.8	4.7.1.1.1.e, 4.7.1.1.2.c	10
L.1	Changes the Frequency of the verification that the water level at the service water pump intake is within its limit from every 12 hours to every 24 hours, consistent with other routine Surveillances in the CTS that verify proper level of other important parameters.	SR 3.7.1.2	4.7.1.1.1.b	3
L.2	Deletes the requirement that the SW system functional test be performed "during shutdown."	N/A	4.7.1.1.1.e	3
L.3	Adds the phrase "actual or," in reference to the automatic initiation signal, to the Surveillance Requirements that verify each SW subsystem actuates on a "simulated" automatic initiation signal.	SR 3.7.1.7	4.7.1.1.1.e.1, 4.7.1.1.1.e.2, 4.7.1.1.1.e.3	3
3.7.2, Control Room Envelope Filtration (CREF) System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for performing the SR ensures each CROASFT is capable of automatic initiation and that the mechanical components operate as designed on system actuation, and that the control room envelope boundary leakage is within the capacity of the CREF System by demonstrating that control room envelope can be maintained at a positive pressure with respect to outside atmosphere when in the emergency pressurization mode of operation.	SR 3.7.2.3, SR 3.7.2.4	4.7.3.e.2	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, C.1, D, and E	3.7.3 Actions	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	Adds the phrase "actual or," in reference to the actuation test signal which verifies that each CREF subsystem actuates on an actuation test signal.	SR 3.7.2.3	4.7.3.e.2	3
	3.7.3, Control Room Envelope Air Conditioning (AC) System			
L.1	Changes, from 7 days to 30 days, the required restoration time of the inoperable control room envelope AC subsystem to OPERABLE status, based on the low probability of an event occurring requiring control room envelope isolation, the consideration that the remaining subsystem can provide the required protection, and the availability of alternate cooling methods.	3.7.3 ACTION A	3.7.3 Actions a and b.1	6
L.2	When one control room envelope AC subsystem is inoperable during movement of irradiated fuel in the secondary containment, Core Alterations, and OPDRVs, the CTS Action requires the control room envelope AC subsystem to be restored in 7 days, or the Operable control room envelope AC subsystem must be placed and maintained in operation. It further exempts the requirements of LCO 3.0.4 provided one Operable control room envelope AC subsystem is in operation. This allowance precludes starting of the above listed evolutions when a control room envelope AC 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 3.7.3. This will allow the evolutions to be started and continued for up to 30 days (see Discussion of Change L.1 in this section for discussion of the change from 7 days to 30 days) before requiring the Operable control room envelope AC subsystem to be placed in operation.	N/A	3.7.3 Action b.1	4

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, C.1, D, and E	3.7.3 Actions	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 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Extends the time provided to restore the Main Turbine Bypass System to OPERABLE status or the time to apply the MCPR limit for an inoperable Main Turbine Bypass System, from 1 hour to 2 hours, consistent with the time provided in ITS 3.2.2 ACTION A to restore a MCPR limit.	3.7.5 ACTION A	3.7.7 Action, 3.2.3 Action b	6
3.7.6, Spent Fuel Storage Pool Water Level				
None	None	None	None	None
Current Specification 3/4.7.1.2, Plant Service Water System - Shutdown				
None	None	None	None	None
Current Specification 3/4.7.2, Revetment - Ditch Structure				
None	None	None	None	None
Current Specification 3/4.7.5, Snubbers				
None	None	None	None	None
Current Specification 3/4.7.6, Sealed Source Contamination				
None	None	None	None	None
Current Specification 3/4.11.1.1, Concentration				
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.11.1.2, Dose				
None	None	None	None	None
Current Specification 3/4.11.1.3, Liquid Radwaste Treatment System				
None	None	None	None	None
Current Specification 3/4.11.2.1, Dose Rate				
None	None	None	None	None
Current Specification 3/4.11.2.2, Dose - Noble Gases				
None	None	None	None	None
Current Specification 3/4.11.2.3, Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form				
None	None	None	None	None
Current Specification 3/4.11.2.4, Gaseous Radwaste Treatment System				
None	None	None	None	None
Current Specification 3/4.11.2.5, Ventilation Exhaust Treatment System				
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.11.2.8, Venting or Purging				
None	None	None	None	None
Current Specification 3/4.11.3, Solid Radioactive Wastes				
None	None	None	None	None
Current Specification 3/4.11.4, Total Dose				
None	None	None	None	None
Current Specification 3/4.12.1, Monitoring Program				
None	None	None	None	None
Current Specification 3/4.12.2, Land Use Census				
None	None	None	None	None
Current Specification 3/4.12.3, Interlaboratory Comparison Program				
None	None	None	None	None

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

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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, g, and 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

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 "62 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

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.	SR 3.8.1.5	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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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 deleted, leaving the ITS periodic Surveillance Frequency as 31 days in 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 is also making 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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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
	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO.	SR 3.8.2.1 Note	4.8.1.2	3
L.3	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 6.9.1.	N/A	4.8.1.1.3	9
L.4	CTS 4.8.1.2, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.8.1.1.2 to be performed. Two of the Surveillances of CTS 4.8.1.1.2 are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Proposed Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable.	SR 3.8.2.1 Note 2	4.8.1.2	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.4, DC Sources Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following surveillances: Visual inspection of battery for physical damage or abnormal deterioration; Verification that cell-to-cell and terminal connections are free of corrosion; Cell-to-cell and terminal connection resistance checks; Battery charger test; and Battery service test.	SR 3.8.4.3, SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7	4.8.2.1.c, 4.8.2.1.d	10
L.1	Removes from CTS 4.8.2.1.b the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is less than 120% of the resistance readings taken during initial installation.	N/A	4.8.2.1.b	3
L.2	CTS 4.8.2.1.c.2 requires the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of proposed SR 3.8.4.5, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries.	SR 3.8.4.5	4.8.2.1.c.2	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	CTS 4.6.2.1.d.2 provides the current rates to be used for a battery service test if a dummy load is used in lieu of the actual emergency loads for Divisions I, II & III, whereas ITS SR 3.8.4.7 does not include the current rates. They have been relocated (see DOC LA.3 for ITS 3.8.4), and the relocated current rates have been changed to be consistent with the load profiles currently provided in the USAR.	SR 3.8.4.7	4.6.2.1.d.2	3
L.4	CTS 4.8.1.2.e allows a performance discharge test to substitute for the service test once every 60 months, whereas ITS SR 3.8.4.7 Note 1 will only allow a modified performance discharge test to be substituted for the service test. In addition, the modified performance discharge test will be allowed to substitute for the service test at any time, instead of just once every 60 months.	SR 3.8.4.7 Note 1	4.8.1.2.e	3
L.5	Adds to CTS 4.8.2.1.e and f an allowance to perform a modified performance discharge test in lieu of a performance discharge test.	SR 3.8.4.8	4.8.2.1.e and f	3
L.6	CTS 4.8.2.1.f requires a battery performance discharge test every 18 months when the battery has reached 85% of its service life. A battery can be at 85% or greater of expected life, and still be within the required capacity to meet OPERABILITY requirements, justifying a Frequency less restrictive than the 18 month Frequency. ITS SR 3.8.4.8 will be required to be performed every 24 months when a battery has reached 85% of expected life with battery capacity ≥ 100% of manufacturer's rating to be consistent with NUREG-1434, Rev 1.	SR 3.8.4.8	4.8.2.1.f	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.5, DC Sources Shutdown			
L.1	Three of the DC sources Surveillances required to be performed by CTS 4.8.2.2 (CTS 4.8.2.1.d, 4.8.2.1.e, and 4.8.2.1.f) involve tests that would cause the only required OPERABLE battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, proposed SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE battery(s) to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO.	SR 3.8.5.1 Note	N/A	3
	3.8.6, Battery Cell Parameters			
L.1	Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 65°F within 7 days after a battery discharge or overcharge.	N/A	4.8.2.1.b	3
L.2	Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge.	Table 3.8.6-1 footnote (a)	Table 4.8.2.1-1	1
L.3	Applies to all Category limits the allowance in CTS Table 4.8.2.1-1 for utilizing charging current in lieu of specific gravity, whereas currently, this allowance is not provided for Category B limits or part of the Category B allowable values.	Table 3.8.6-1 footnote (c)	Table 4.8.2.1-1 footnote (f)	1

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.4	The time specified in CTS Table 4.8.2.1-1 footnotes (a) and (b) to restore Category A and B battery cell parameters to within limits has been extended from the next 6 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days.	3.8.6 Required Actions A.2 and A.3	Table 4.8.2.1-1 footnotes (a) and (b)	6
	3.8.7, Inverters Operating			
L.1	CTS 3.8.3.1 Action a.1 allows 8 hours to reenergize an inoperable Division 1 or 2 120-volt AC distribution panel by its associated Division 1 or 2 inverter. ITS LCO 3.8.7 addresses the OPERABILITY of the Division 1 and 2 inverters and extends the restoration time from the current 8 hours to 24 hours.	3.8.7 Required Action A.1	3.8.3.1 Action a.1	6

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.8, Distribution Systems Operating			
L.1	CTS allows 8 hours to restore one inoperable AC subsystem and allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.3. ITS 3.8.8 ACTIONS A, B, and C, allows one "or more" AC, 120 VAC uninterruptible, and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.8 ACTION F is also added to require that if two or more electrical power distribution subsystems are inoperable and result in a loss of function, then ITS 3.0.3 must be entered immediately. In addition, if an AC subsystem and a 120 VAC uninterruptible subsystem are inoperable, a total of 8 hours is provided in CTS 3.8.3.1 Action a.1 to restore both to OPERABLE status. ITS 3.8.8 ACTIONS A and B will allow each inoperability to be tracked separately, allowing a maximum of 16 hours to restore both subsystems (if the AC subsystem and 120 VAC uninterruptible subsystem inoperabilities are separated by 8 hours). However, ITS 3.8.8 ACTION F will also ensure that if this results in a loss of function, then ITS LCO 3.0.3 must be entered immediately.	3.8.8 ACTIONS A, B, C, and F	3.8.3.1 Actions a.1 and b.1	6
	3.8.9, Distribution Systems Shutdown			
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.8.1 - AC Circuits Inside Primary Containment				
None	None	None	None	None
Current Specification 3/4.8.4.2 - Primary Containment Penetration Conductor Overcurrent Protective Devices				
None	None	None	None	None
Current Specification 3/4.8.4.3 - Emergency Lighting System - Overcurrent Protective Devices				
None	None	None	None	None

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.1, Refueling Equipment Interlocks				
L.1	Adds actions to allow a control rod block to be inserted and to verify all control rods in core cells containing one or more fuel assemblies in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable.	3.9.1 Required Actions A.2.1 and A.2.2	N/A	4
L.2	Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY.	N/A	4.9.1.2	3
L.3	Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.1.3	3
3.9.2, Refuel Position One-Rod-Out Interlock				
L.1	Deletes the requirement to "lock" the mode switch in Shutdown.	N/A	LCO 3.9.1, 3.9.1 Action a, 4.9.1.1	8

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS required CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel.	3.9.2 Required Actions A.1 and A.2	3.9.1 Actions a and b	5
L.3	Deletes the requirement to perform CTS 4.9.1.1 "within 2 hours before" and CTS 4.9.1.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY.	N/A	4.9.1.1, 4.9.1.2	3
L.4	Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance.	SR 3.9.2.2 Note	N/A	7
L.5	Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.1.3	3
L.6	Changes the requirement that the one-rod-out interlock function be Operable at all times when in Mode 5 to only require the one-rod-out interlock when a control rod is withdrawn, consistent with CTS 3/4.9.1, which requires the one-rod-out interlock to be Operable only if a control rod is withdrawn.	LCO 3.9.2	Tables 3.3.6-1 and 4.3.6-1 Function 6.b	2

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.3, Control Rod Position			
None	None	None	None	None
	3.9.4, Control Rod Position Indication			
L.1	Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, and that the full-out indicator functions during rod coupling checks, have been deleted.	LCO 3.9.4, SR 3.9.4.1	LCO 3.1.3.7, 3.1.3.7 Action b, 4.1.3.7.a, 4.1.3.7.b, 4.1.3.7.c	1, 3
	3.9.5, Control Rod OPERABILITY Refueling			
L.1	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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.6, RPV Water Level Irradiated Fuel			
L.1	Deletes the requirement to perform CTS 4.9.8 "within 2 hours before the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for the verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.9.8	3
	3.9.7, RPV Water Level New Fuel or Control Rods			
L.1	Splits current Specification 3.9.8, which provides reactor vessel water level requirements during movement of fuel assemblies and handling of control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange, as is in CTS 3.9.8.	LCO 3.9.7	LCO 3.9.8	1
L.2	Deletes the requirement to perform CTS 4.9.8 "within 2 hours before the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for the verification of the reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.9.8	3
	3.9.8, Residual Heat Removal (RHR) High Water Level			
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.9, Residual Heat Removal (RHR) Low Water Level				
None	None	None	None	None
Current Specification 3/4.9.4, Decay Time				
None	None	None	None	None
Current Specification 3/4.9.5, Communications				
None	None	None	None	None
Current Specification 3/4.9.6, Refueling Platform				
None	None	None	None	None
Current Specification 3/4.9.7, Crane Travel - Spent Fuel Storage Pool				
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.10.1, System Leakage and Hydrostatic Testing Operation				
L.1	Deletes requirement for Isolation Actuation Instrumentation Drywell Pressure - High Function to be Operable during system leakage and hydrostatic testing.	N/A	LCO 3.10.7.a	1
3.10.2, Reactor Mode Switch Interlock Testing				
L.1	ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted. An additional change is proposed to include Refuel as an allowable reactor mode switch position for these interlock tests in Hot Shutdown and Cold Shutdown conditions.	LCO 3.10.2	Table 1.2 footnote *, 4.9.1.2 and 4.9.1.3 footnote *	1
3.10.3, Single Control Rod Withdrawal Hot Shutdown				
L.1	Deletes requirement to "lock" the reactor mode switch in Refuel.	N/A	LCO 3.9.1, 4.9.1.1	8
3.10.4, Single Control Rod Withdrawal Cold Shutdown				
L.1	Deletes the requirements to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	LCO 3.9.10.1.a, 4.9.10.1.a, LCO 3.9.1, 4.9.1.1	1, 8

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in place of the current SHUTDOWN MARGIN and control rod five-by-five array disarming requirements. The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring Logic, and LCO 3.3.8.3, RPS Electric Power Monitoring Scram Solenoids, and LCO 3.9.5, Control Rod OPERABILITY Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement.	LCO 3.10.4.b.2, LCO 3.10.4.c.1, SR 3.10.4.1, SR 3.10.4.4	N/A	1
L.3	Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours before the start of" removal of a control rod or control rod drive mechanism, since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.1	3
3.10.5, Single Control Rod Drive Removal Refueling				
L.1	Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	LCO 3.9.10.1.a, 4.9.10.1.a	1, 8

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours before the start of" removal of a control rod or control rod drive mechanism, since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.1	3
3.10.6, Multiple Control Rod Withdrawal Refueling				
L.1	Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	LCO 3.9.10.2.a, 4.9.10.2.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.9.10.2.1 "Within 4 hours before the start of" removal of a control rod or control rod drive mechanism, since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.2.1	3
L.3	Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.9.10.2, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.10.2.2	3
3.10.7, Control Rod Testing Operating				
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.10.8, SDM Test Refueling				
L.1	Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test.	SR 3.10.8.2, SR 3.10.8.4	4.10.3	3
Current Specification 3/4.10.1, Primary Containment Integrity				
None	None	None	None	None
Current Specification 3/4.10.4, Recirculation Loops				
None	None	None	None	None
Current Specification 3/4.10.5, Oxygen Concentration				
None	None	None	None	None
Current Specification 3/4.10.6, Training Startups				
None	None	None	None	None

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Provides allowance for a limited number of lead fuel assemblies that have not completed representative testing to be placed in nonlimiting core regions, providing recognition of a specific kind of special test with lead fuel assemblies that may be performed.	4.2.1	5.3.1	1

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LD.2	Extends the Frequency from 18 to 24 months for the following: CTS 4.6.5.3.b.1, 4.6.5.3.b.2, 4.6.5.3.b.3, 4.6.5.3.d.1, and 4.6.5.3.d.4, which ensure that the SGT System inplace charcoal adsorbers, HEPA filters, and heaters are capable of performing their safety function.	5.5.7	4.6.5.3.b.1, 4.6.5.3.b.2, 4.6.5.3.b.3, 4.6.5.3.d.1, 4.6.5.3.d.4	10
LD.3	Extends the Frequency from 18 to 24 months for the following: CTS 4.7.3.c.1, 4.7.3.c.2, 4.7.3.c.3, 4.7.3.e.1, and 4.7.3.e.3 which ensure that in-place Control Room Envelope Filtration System inplace charcoal adsorbers, HEPA filters, and heaters are capable of performing their safety function.	5.5.7	4.7.3.c.1, 4.7.3.c.2, 4.7.3.c.3, 4.7.3.e.1, 4.7.3.e.3	10
	5.6, Reporting Requirements			
L.1	Relaxes the requirement for submitting the Occupational Radiation Exposure Report and the requirement for submitting the Annual Radiological Environmental Operating Report from March 1 and May 1 of each year, respectively, to April 30 and May 15 of each year, respectively.	5.6.1, 5.6.2	6.9.1.4, 6.9.1.7	6
L.2	Specifies that the Radioactive Effluent Release Report shall be submitted in accordance with 10 CFR 50.36a (i.e., annually) versus semiannually as is currently required.	5.6.3	6.9.1.8	6

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
5.7, High Radiation Area				
L.1	Significantly revises high radiation area access control alternatives as a result of the changes to 10 CFR 20, the guidance provided in Regulatory Guide 8.38 (Control of Access to High and Very High Radiation Areas in Nuclear Power Plants), and current industry technology in controlling access to high radiation areas. The changes include a capping dose rate to differentiate a high radiation area from a very high radiation area, additional requirements for groups entering high radiation areas, and clarification of the need for communication and control of workers in high radiation areas.	5.7	6.12	1
Current Specification 6.4, Training				
None	None	None	None	None
Current Specification 6.5, Review and Audit				
None	None	None	None	None
Current Specification 6.6, Reportable Event Action				
None	None	None	None	None
Current Specification 6.7, Safety Limit Violation				
None	None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 6.10, Records Retention				
None	None	None	None	None
Current Specification 6.11, Radiation Protection Program				
None	None	None	None	None
Current Specification 6.13, Process Control Program				
None	None	None	None	None
Current Specification 6.15, Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems				
None	None	None	None	None

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 Months

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Modifies CTS Table 1.2 by a) the addition of the head closure status (ITS Table 1.1-1 footnote (a)) to Conditions (MODES) 3 and 4; b) the addition of the refuel mode switch position to MODE 2 (including footnote (a)); and c) the deletion of the coolant temperature limit of MODE 5. These changes address plant conditions not previously satisfying a defined MODE, or satisfying more than one MODE.	Table 1.1-1	Table 1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation.	2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3	2.1.1, 2.1.2, 2.1.3, 2.1.4
M.2	Specifies limits on steam dome pressure and core flow as "greater than or equal to" instead of "greater than," resolving a discontinuity between the Safety Limits in CTS 2.1.1 and CTS 2.1.2.	2.1.1.2	2.1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	The statement, "For Frequencies specified as "once," the above interval extension does not apply," was added to clarify that the 1.25 times the interval specified in the Frequency does not apply to certain Surveillances.	SR 3.0.2	4.0.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
M.1	Adds an additional Surveillance Frequency for SDM verification (CTS 4.1.1.a) to clarify the requirements necessary for assuring SDM during the refueling process.	SR 3.1.1.1 1st Frequency	N/A
	3.1.2, Reactivity Anomalies		
None	None	None	None
	3.1.3, Control Rod OPERABILITY		
M.1	Revises separation criteria requirement for inoperable control rods to ensure the safety analysis assumptions are met. CTS requires the separation criteria to be met only for withdrawn control rods. ITS 3.1.3 Condition D applies to all inoperable control rods (when ≤ 10% RTP), whether inserted or withdrawn.	3.1.3 Condition D	3.1.3.1 Actions a.1.a) and b.1.a)
M.2	If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs.	3.1.3 Required Action A.2	3.1.3.1 Action a.1.b
M.3	Eliminates the check of insertion capability for non-stuck inoperable control rods (i.e., when they are inoperable due to loss of position indication when below the low power setpoint), replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.1 Action b.1.b) including footnote *
M.4	Requires control rods to be inserted in lieu of the CTS requirement for "moving," since the purpose of the test is to assure scram insertion capability and restricting the test to only allow control rod insertion provides an increased likelihood of this test detecting a problem that impacts this capability.	SR 3.1.3.2, SR 3.1.3.3	4.1.3.1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.5	Changes Actions for non-stuck inoperable control rods (i.e., when control rod position indication is lost) to eliminate the check of insertion capability, replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.7 Action a.3.a).1)
	3.1.4, Control Rod Scram Times		
M.1	Changes the pressure at which the control rods must be tested from ≥ 950 to ≥ 800 psig, corresponding to the limiting pressure for CRD scram testing for the NMP2 system.	SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.4	4.1.3.2
M.2	Deletes the flexibility provided by footnote * of CTS 4.1.3.2.b "for specifically affected" control rods to delay post-maintenance testing until reactor pressure is ≥ 950 psig (i.e., entry into MODE 2 is currently allowed without scram time testing a control rod that has had maintenance performed, provided the scram time test is performed prior to entry into MODE 1). A Surveillance Requirement, SR 3.1.4.3, has been added that requires a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable. To allow testing at less than normal operating pressures, a requirement for scram time limits at < 800 psig is included.	SR 3.1.4.3, SR 3.1.4.4	4.1.3.2.b including footnote *
M.3	Provides new individual control rod scram time limits, limits the number of slow rods to 13, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds.	LCO 3.1.4, Table 3.1.4-1	LCO 3.1.3.2, LCO 3.1.3.3, LCO 3.1.3.4
	3.1.5, Control Rod Scram Accumulators		
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.1.6, Rod Pattern Control			
M.1	To ensure the safety analysis assumptions relative to the Control Rod Drop Accident are maintained, a new Specification is added that requires the control rod pattern to be in compliance with the banked position withdrawal sequence (BPWS) when THERMAL POWER is ≤ 10% RTP in MODES 1 and 2.	3.1.6	N/A
3.1.7, Standby Liquid Control System			
None	None	None	None
3.1.8, RCS Specific Activity			
None	None	None	None
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support			
None	None	None	None
Current Specification 3/4.1.4.2, Rod Sequence Control System			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.2, MINIMIUM CRITICAL POWER RATIO			
NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.4, APRM Gain and Setpoint			
NONE	NONE	NONE	NONE

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 on 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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	Adds an RBM Surveillance to verify the automatic enabling points of the RBM.	SR 3.3.2.1.4	N/A
M.3	The Note to SR 3.3.2.1.1 will require the RWM to be determined Operable (by performing a CHANNEL FUNCTIONAL TEST) within 1 hour after withdrawal of any control rod when RTP is ≤ 10%, not just when the withdrawal is for the purpose of making the reactor critical as required by CTS.	SR 3.3.2.1.1 Note	3.1.4.1 footnote *, 4.1.4.1.a and b
M.4	With the RWM inoperable, the CTS allows control rod movement to continue provided a second licensed operator or other qualified member of the technical staff verifies control rod movement is in compliance with the prescribed control rod sequence (banked position withdrawal sequence). In the ITS, with the RWM inoperable during a reactor startup, continued movement of control rods will only be allowed if ≥ 12 control rods are withdrawn or if a startup with RWM inoperable has not been performed in the last calendar year. These new requirements are being added to offset the deletion of the RSCS LCO and ensure the RWM is reliable.	3.3.2.1 Required Actions C.2.1.1 and C.2.1.2	3.1.4.1 Action a
M.5	Adds a RWM Surveillance to verify the automatic enabling point of the RWM.	SR 3.3.2.1.5	N/A
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
M.1	Adds a Surveillance to perform a CHANNEL CHECK every 24 hours of the feedwater and main turbine high water level trip instrumentation.	SR 3.3.2.2.1	N/A
M.2	The allowable outage time for two inoperable channels has been decreased from 72 hours to 2 hours, because this instrumentation is required to be operable to preclude a MCPR violation.	3.3.2.2 ACTION B	Table 3.3.9-1 Action 140.b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.3.1, Post Accident Monitoring Instrumentation		
M.1	Increases the CHANNEL CALIBRATION frequency for the drywell oxygen concentration analyzers from once per 18 months to once per 92 days to establish consistency with the calibration Frequency supported by the maintenance history.	SR 3.3.3.1.2 for Table 3.3.3.1-1, Function 10	4.3.7.5, Table 4.3.7.5-1
	3.3.3.2, Remote Shutdown System		
None	None	None	None
	3.3.4.1, EOC-RPT Instrumentation		
M.1	Adds a Note to ITS 3.3.4.1 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, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note ensures the functional capability of the EOC-RPT Instrumentation is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.1 Required Action A.2 Note	3.3.4.2 Actions b and c.1
M.2	Adds a Surveillance Requirement to verify the automatic enabling of the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions at ≥ 30% RTP.	SR 3.3.4.1.4	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.4.2, ATWS-RPT Instrumentation		
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 a Surveillance Requirement 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.	SR 3.3.4.2.4	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 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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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
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; adding a more conservative Required Action that accomplishes the result of the automatic trip in advance of the automatic trip.	3.3.5.2 Required Action D.2.2	Table 3.3.5-1 Action 51

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.6.1, Primary Containment Isolation Instrumentation		
M.1	The Applicability for the Reactor Vessel Water Level – Low, Level 3 Function has been changed to require operability in MODES 4 and 5, with only one of two trip systems required to be 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.	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
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.	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.	Table 3.3.6.1-1 Functions 3.j and 3.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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.6.2, Secondary Containment Isolation Instrumentation		
M.1	A requirement to perform a Channel Check every 12 hours is 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
	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

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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	Five timer functions, including appropriate 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
3.3.8.2, RPS Electric Power Monitoring-Logic			
M.1	CTS 3.8.4.4 Actions a and b provide the option to remove the associated RPS UPS from service and continue to operate with no restrictions with one or both electric power monitoring assemblies inoperable. ITS 3.3.8.2 ACTIONS A and B will only allow restoration of the inoperable electric power monitoring assembly(s).	N/A	3.8.4.4 Actions a and b
M.2	Not used.		
M.3	Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS logic electric power monitoring assemblies.	SR 3.3.8.2.2	N/A
M.4	The underfrequency setpoint currently specified in the CTS is actually the Analytical Limit. The ITS includes the more conservative Allowable Value from this setpoint calculation, not the Analytical Limit.	SR 3.3.8.2.2	4.8.4.4.b.3
A.3	A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is in MODE 1, 2, or 3. This action is functionally equivalent to the CTS 3.0.3, which is currently required if CTS 3.8.4.4 Actions a and b are not met (although CTS 3.0.3 does provide an additional 1 hour to commence the shutdown).	3.3.8.2 ACTION C	CTS 3.8.4.4 Actions
3.3.8.3, RPS Electric Power Monitoring-Scram Solenoids			
M.1	Not used.		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS scram solenoid electrical protection assemblies.	SR 3.3.8.3.2	N/A
M.3	The underfrequency setpoint currently specified in the CTS is actually the Analytical Limit. The ITS includes the more conservative Allowable Value from this setpoint calculation, not the Analytical Limit.	SR 3.3.8.3.2	4.8.4.5.b.3
A.4	A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is MODE 1 or 2. This action is functionally equivalent to the CTS 3.0.3, which is currently required if CTS 3.8.4.5 Actions a and b are not met (although CTS 3.0.3 does provide an additional 1 hour to commence the shutdown).	3.3.8.3 ACTION C	CTS 3.8.4.5 Actions
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			
None	None	None	None
Current Specification 3/4.3.7.8, Loose Part Detection System			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.3.7.9, Radioactive Liquid Effluent Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.7.10, Radioactive Gaseous Effluent Monitoring Instrumentation			
None	None	None	None
Current Specification 3/4.3.9, Plant Systems Actuation Instrumentation			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 -REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
M.1	The requirement to verify once per 12 hours that core flow is > 39% when THERMAL POWER is in the restricted zone during single loop operation is revised to determine core flow during both single and two loop operation since it is possible to fall in this region (≤ 39% core flow) in both modes of operation. In addition, ITS Required Action B.2 does not specifically state to verify core flow > 39%, only to determine core flow. The wording of the ITS Conditions ensures the proper Action will be entered based upon the core flow.	3.4.1 Required Action B.2	4.4.1.1.1, 4.4.1.1.1.d
M.2	Adds a surveillance to verify operation is in the "Unrestricted Zone" of ITS Figure 3.4.1-1 every 12 hours to ensure that entry into a region where potential instabilities can occur will not go undetected.	SR 3.4.1.1	N/A
	3.4.2, Flow Control Valves (FCVs)		
None	None	None	None
	3.4.3, Jet Pumps		
None	None	None	None
	3.4.4, Safety/Relief Valves (S/RVs)		
None	None	None	None
	3.4.5, RCS Operational Leakage		
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 -REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.4.6, RCS Pressure Isolation Valve (PIV) Leakage			
None	None	None	None
3.4.7, RCS Leakage Detection Instrumentation			
None	None	None	None
3.4.8, RCS Specific Activity			
M.1	Changes the Frequency for isotopic analysis for dose equivalent I-131 concentration from at least once per 31 days to at least once per 7 days as a compensatory measure for ensuring that, even with deletion of the requirement that gross specific activity remain less than or equal to 100/E-bar μCi/gram, offsite doses will remain within a small fraction of the limits of 10 CFR 100.	SR 3.4.8.1	Table 4.4.5-1, Item 2
3.4.9, RHR Shutdown Cooling System - Hot Shutdown			
None	None	None	None
3.4.10, RHR Shutdown Cooling System - Cold Shutdown			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 -REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.4.11, RCS Pressure and Temperature (P/T) Limits			
M.1	Completion Times are added in the ITS for the engineering evaluation.	3.4.11 Required Actions A.2 and C.2	3.4.6.1 Action
M.2	Adds Actions which require an engineering evaluation to be performed to ensure continued operation is acceptable when a recirculation pump is started or running without having met the temperature requirements. CTS only states to suspend the startup of a recirculation loop; it does not provide an action if the loop is already operating.	3.4.11 ACTIONS A, B, and C	3.4.1.4 Action
3.4.12, Reactor Steam Dome Pressure			
M.1	Deletes footnote that states that the reactor steam dome pressure limit is not applicable during anticipated transients.	N/A	3.4.6.2 footnote *
Current Specification 3/4.4.4, Chemistry			
None	None	None	None
Current Specification 3/4.4.8, Structural Integrity			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS Operating		
M.1	Adds a surveillance to verify the ADS nitrogen receiver discharge header pressure is ≥ 160 psig and to verify the ADS nitrogen receiver tanks' pressure is ≥ 334 psig.	SR 3.5.1.3	N/A
M.2	Adds a requirement, as represented by the STAGGERED TEST BASIS, for both ADS valve solenoids to be verified in the course of 48 months.	SR 3.5.1.7	4.5.1.e.2.b)
	3.5.2, ECCS-Shutdown		
M.1	Deletes allowance to not require the suppression pool to be OPERABLE during cavity flooding.	N/A	3.5.3 footnote *
	3.5.3, RCIC System		
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.4	ITS 3.6.1.3 Required Actions D.2 and E.2 are being added. These Required Actions 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. This will ensure the penetration remains isolated. This is an additional restriction on plant operations.	3.6.1.3 Required Actions D.2 & E.2	N/A
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 the RHR pumps be OPERABLE. 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	N/A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.7, Suppression Chamber-to-Drywell Vacuum Breakers			
None	None	None	None
3.6.2.1, Suppression Pool Average Temperature			
M.1	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 200 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the requirement in CTS 3.6.2.1.a.2.c), with closed MSIVs, has been removed from the LCO and is now only in the ACTIONS.	3.6.2.1 ACTION E	3.6.2.1.a. 2.c)
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current ACTIONS for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 200 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS D and E	3.6.2.1.a. 2.b), 3.6.2.1.a. 2.c), 3.6.2.1 Actions b.2.b) and b.3
M.3	Expands, from MODES 1 and 2 to MODES 1, 2, and 3, the applicability for performance of the suppression pool average temperature verification.	SR 3.6.2.1.1	4.6.2.1.b
3.6.2.2, Suppression Pool Water Level			
None	None	None	None

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.2.3, RHR Suppression Pool Cooling		
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	3.6.2.3 Action b, footnote *
	3.6.2.4, RHR Suppression Pool 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 *
	3.6.3.1, Primary Containment Hydrogen Recombiners		
None	None	None	None
	3.6.3.2, Primary Containment Oxygen Concentration		
None	None	None	None
	3.6.4.1, Secondary Containment		
M.1	Deletes the allowance for both doors in a secondary containment access to be open concurrently during normal entry and exit.	N/A	4.6.5.1.b.2

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	Requires both SGT subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires one subsystem to be tested every 18 months; however, the same SGT subsystem could be tested every outage.	SR 3.6.4.1.5	4.6.5.1.c.2
3.6.4.2, Secondary Containment Isolation Valves			
None	None	None	None
3.6.4.3, Standby Gas Treatment System			
M.1	For both SGT subsystems inoperable in MODE 1, 2, or 3, the CTS requirement that action be initiated within 1 hour to be in Hot Shutdown within the next 12 hours and Cold Shutdown within the following 24 hours is changed to direct entry into LCO 3.0.3.	3.6.4.3 ACTION D	3.6.5.3 Action b.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, Service Water System and Ultimate Heat Sink		
M.1	Adds a Note indicating that the applicable Conditions for the RHR Shutdown Cooling System – Hot Shutdown Technical Specification (ITS 3.4.9) must be entered when RHR shutdown cooling is made inoperable by the SW System or UHS (requiring cascading of specifications), since the Required Actions of ITS 3.7.1 do not necessarily provide appropriate actions when the shutdown cooling mode of the RHR System is made inoperable by the SW System or UHS.	3.7.1 ACTION G Note	N/A
	3.7.2, Control Room Envelope Filtration (CREF) System		
M.1	Adds a new requirement (discussed in the Bases for SR 3.7.2.3) to the verification that the CROASFT will automatically switch to the emergency pressurization mode on a radiation signal and a LOCA signal; i.e., that the air handling units start on a low flow signal with the appropriate time delay.	SR 3.7.2.3	N/A
M.2	Adds a new requirement (discussed in the Bases for SR 3.7.2.1) to the requirement that the CROASFT be operated with flow through the HEPA filters and charcoal adsorbers for 10 hours every 31 days; i.e., that the air handling unit fans also be operated for 10 hours as part of this test.	SR 3.7.2.1	N/A
	3.7.3, Control Room Envelope Air Conditioning (AC) System		
M.1	Adds a new Surveillance Requirement which delineates specific requirements for operability of the Control Room Envelope AC System; i.e., verification that the heat removal capability of the system is sufficient to remove the control room envelope heat load assumed in the safety analysis.	SR 3.7.3.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.4, Main Condenser Offgas		
M.1	Changes the Applicability such that the LCO is required to be met in MODE 3 with any steam line not isolated and SJAE in operation. The CTS 3.11.2.7 Action has been modified to also require the plant to be in MODE 4 in 36 hours (ITS 3.7.4 Required Action B.3.2), which will exit the new Applicability.	LCO 3.7.4, 3.7.4 Required Action B.3.2	LCO 3.11.2.7, 3.11.2.7 Action
M.2	Changes the amount of increase requiring verification that the release rate of noble gases downstream of the recombiner is within limits within 4 hours following the increase from > 50% to include an increase equivalent to 50%.	SR 3.7.4.1	4.11.2.7.2.b
	3.7.5, Main Turbine Bypass System		
None	None	None	None
	3.7.6, Spent Fuel Storage Pool Water Level		
None	None	None	None
	Current Specification 3/4.7.2, Plant Service Water System - Shutdown		
None	None	None	None
	Current Specification 3/4.7.1.2, Revetment - Ditch Structure		
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	Current Specification 3/4.7.5, Snubbers		
None	None	None	None
	Current Specification 3/4.7.6, Sealed Source Contamination		
None	None	None	None
	Current Specification 3/4.11.1.1, Concentration		
None	None	None	None
	Current Specification 3/4.11.1.2, Dose		
None	None	None	None
	Current Specification 3/4.11.1.3, Liquid Radwaste Treatment System		
None	None	None	None
	Current Specification 3/4.11.2.1, Dose Rate		
None	None	None	None
	Current Specification 3/4.11.2.2, Dose - Noble Gases		
None	None	None	None

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.11.2.3, Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form			
None	None	None	None
Current Specification 3/4.11.2.4, Gaseous Radwaste Treatment System			
None	None	None	None
Current Specification 3/4.11.2.5, Ventilation Exhaust Treatment System			
None	None	None	None
Current Specification 3/4.11.2.8, Venting or Purging			
None	None	None	None
Current Specification 3/4.11.3, Solid Radioactive Wastes			
None	None	None	None
Current Specification 3/4.11.4, Total Dose			
None	None	None	None
Current Specification 3/4.12.1, Monitoring Program			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.12.2, Land Use Census			
None	None	None	None
Current Specification 3/4.12.3, Interlaboratory Comparison Program			
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 Required Action for the inoperable offsite circuit 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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.6	Changes from 72 hours to 24 hours the time provided for the Division 3 DG to be inoperable concurrent with either the Division 1 or Division 2 DG.	3.8.1 ACTION E	3.8.1.1 Action i
M.7	CTS provides, as applicable, an upper voltage limit of 4576 V and a lower voltage limit of 3744 V or 3750 V. The ITS provides an upper steady state voltage limit of 4370 V for all three DGs, a lower voltage limit (both steady state and initial startup) of 3950 V for the Division 1 and 2 DGs, and a lower steady state voltage limit of 3950 V and a lower initial startup voltage of 3820 V for the Division 3 DG. The new upper voltage limit ensures that when an associated bus is lightly loaded, the maximum voltage rating of components powered by the bus will not be exceeded. The new lower voltage limits ensure that the components powered by an associated bus will have sufficient voltage to perform their required function.	SR 3.8.1.2, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.13, SR 3.8.1.17	4.8.1.1.2.a.4.a), 4.8.1.1.2.a.4.b), 4.8.1.1.2.e.4.a)2), 4.8.1.1.2.e.4.b)2), 4.8.1.1.2.e.5, 4.8.1.1.2.e.6.a)2), 4.8.1.1.2.e.6.b)2), 4.8.1.1.2.f
M.8	Two Notes have been added representative of current NMP2 practice (though more restrictive since the CTS does not have these restrictions): 1) SR 3.8.1.3 Note 3 precludes this Surveillance from being performed on more than one DG at a time ensuring that an electrical disturbance during the DG test can only adversely affect one DG; and 2) SR 3.8.1.3 Note 4 requires that this SR be immediately preceded by a successful performance of SR 3.8.1.2 (DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test.	SR 3.8.1.3 Notes 3 and 4	N/A
M.9	Adds limitations on the operating power factor for the single load rejection test, the full load rejection test, and the 24-hour run Surveillance. The actual power factor values have been added to the Bases. A Note has been also added, which is consistent with the intent of the CTS, to ensure a momentary transient that results in the power factor not being met does not invalidate the 24 hour run.	SR 3.8.1.7 Note 2, SR 3.8.1.8 including Note 2, SR 3.8.1.12 including Notes 1 and 3	4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.8

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 through the associated automatic load sequence time delays 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	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.2, AC Sources Shutdown		
M.1	Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require supplying power to all necessary electrical power distribution subsystems, if one or more subsystems are not powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering. To ensure conservative actions, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is also added.	LCO 3.8.2.a, 3.8.2 Required Action A.1	LCO 3.8.1.2.a
M.2	Requires the single Division 1 or Division 2 DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what division the required DG must be associated with.	LCO 3.8.2.b	LCO 3.8.1.2.b
M.3	CTS requires that, when in MODE 5 with the water level less than 22 feet above the RPV flange, action is to be initiated to restore the required AC power sources to OPERABLE status; whereas, ITS implements a requirement to initiate action to restore the required power sources to OPERABLE status in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment.	3.8.2 Required Actions A.2.4 and B.4	3.8.1.2 Action a
	3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air		
M.1	Adds a lube oil requirement, appropriate ACTION, ACTIONS Note, and Surveillance Requirement that will ensure a 7 day supply of lube oil is available onsite for all DGs.	LCO 3.8.3, 3.8.3 ACTIONS Note, 3.8.3 ACTION B, SR 3.8.3.2	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	The minimum LCO level for Division 1 and 2 DG fuel oil storage tanks is being increased from ≥ 47,547 gallons to 50,000 gallons. The 6 day fuel oil storage tank levels are being increased from ≥ 40,755 gallons to ≥ 44,000 gallons for Division 1 and 2 DGs and from ≥ 30,293 gallons to ≥ 30,813 gallons for Division 3 DG.	3.8.3 Condition A, SR 3.8.3.1	LCO 3.8.1.1.a.2, LCO 3.8.1.2.b.2, 3.8.1.1 Action j, 3.8.1.2 Action d
3.8.4, DC Sources Operating			
M.1	Adds a requirement to ensure that the battery cell to cell and terminal connections are coated with anti-corrosion material, consistent with IEEE-450 recommendations.	SR 3.8.4.4	N/A
M.2	Changes the 18 month Frequency for current Surveillance 4.8.2.1.f (battery performance discharge test) to 12 months, consistent with the recommendations of IEEE-450-1995.	SR 3.8.4.8	4.8.2.1.f

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.5, DC Sources Shutdown		
M.1	ITS LCO 3.8.5 specifies that the sources necessary to supply 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" DC electrical power source 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 sources being required. CTS 3.8.2.2 Action a has been subsequently modified to be "one or more required" instead of the current "less than the," to account for this potential addition. In addition, ITS 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 DC source. Currently, this action only applies to the Division 3 equipment (HPCS System).	LCO 3.8.5, 3.8.5 Required Action A.1	LCO 3.8.2.2, 3.8.2.2 Action a
M.2	In the event the necessary Division 1, 2, or 3 DC sources are not OPERABLE, ITS Required Action A.2.4 is added to commence and continue attempts to restore the necessary DC sources, 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 ITS LCO 3.0.4.	3.8.5 Required Action A.2.4	N/A
M.3	Provides new Required Actions for when the Division 3 DC source is inoperable, which require suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and operations with the potential for draining the reactor vessel (OPDRVs).	3.8.5 Required Actions A.2.1, A.2.2, and A.2.3	3.8.2.2 Action b

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, footnotes (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 charge 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	4.8.3.1.1

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	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	N/A
	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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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	N/A
M.3	New Required Actions have been provided for when the Division 3 AC or DC distribution subsystem is inoperable, requiring suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs.	3.8.9 Required Actions A.2.1, A.2.2, and A.2.3	3.8.3.2 Actions a.2 and b.2
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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
None	None	None	None
	3.9.2, Refuel Position One-Rod-Out Interlock		
None	None	None	None
	3.9.3, Control Rod Position		
None	None	None	None
	3.9.4, Control Rod Position Indication		
M.1	Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.1.3.7 Action b for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The ACTIONS of ITS 3.9.4 require that fuel movement and control rod withdrawal be suspended and all insertable control rods in core cells containing fuel assemblies be fully inserted, or alternatively, that the control rod be fully inserted and disarmed. Also, a Completion Time has been added to specify that the Required Actions be completed "immediately".	LCO 3.9.4, 3.9.4 Required Actions A.1.1, A.1.2, A.1.3, A.2.1, and A.2.2	LCO 3.1.3.7, 3.1.3.7 Action b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.5, Control Rod OPERABILITY Refueling			
M.1	Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram).	LCO 3.9.5, 3.9.5 ACTION A, SR 3.9.5.1	N/A
3.9.6, RPV Water Level Irradiated Fuel			
None	None	None	None
3.9.7, RPV Water Level New Fuel or Control Rods			
None	None	None	None
3.9.8, Residual Heat Removal (RHR) High Water Level			
None	None	None	None
3.9.9, Residual Heat Removal (RHR) Low Water Level			
M.1	Requires the following actions to be immediately initiated if an alternate method of decay heat removal is not verified: 1) restore secondary containment to Operable status; 2) restore one SGT subsystem to Operable status; and 3) restore isolation capability in each required secondary containment penetration flow path not isolated. These new actions will ensure the secondary containment boundary is intact to filter any release in the unlikely case the loss of shutdown cooling results in a release of fission products.	3.9.9 ACTION B	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.9.4, Decay Time			
None	None	None	None
Current Specification 3/4.9.5, Communications			
None	None	None	None
Current Specification 3/4.9.6, Refueling Platform			
None	None	None	None
Current Specification 3/4.9.7, Crane Travel - Spent Fuel Storage Pool			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.1, System Leakage and Hydrostatic Testing Operation			
None	None	None	None
3.10.2, Reactor Mode Switch Interlock Testing			
M.1	Adds an appropriate ACTION to identify the Required Actions and Completion Times for noncompliance with Special Operation ITS 3.10.2. Also, adds Surveillance Requirements to provide increased assurance of continued compliance with Special Operations ITS 3.10.2.	3.10.2 ACTIONS, SR 3.10.2.1, SR 3.10.2.2	N/A
3.10.3, Single Control Rod Withdrawal Hot Shutdown			
M.1	Adds additional restrictions to ensure 1) the full-in position indication is Operable for the affected control rods; 2) all other control rods are fully inserted; and 3) RPS Mode 5 requirements for the SDV trip, the RPS electric power monitoring assemblies, and the affected control rod are Operable or that the control rods are appropriately precluded from the potential of a local reactivity excursion. Furthermore, an ACTION and Surveillance Requirements are also provided in the proposed presentation for these new requirements.	LCO 3.10.3 Items b, c, and d, 3.10.3 ACTION A, SR 3.10.3.1, SR 3.10.3.2, SR 3.10.3.3	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.4, Single Control Rod Withdrawal Cold Shutdown		
M.1	If CTS 3.9.10.1 is not met and the withdrawn control rod is insertable, two additional Required Actions are provided in ITS 3.10.4 ACTION A. Required Action A.2.1 requires action to be initiated immediately to fully insert all insertable control rods. Required Action A.2.2 requires the placing of the reactor mode switch to the Shutdown position, which will preclude withdrawal of any control rod. In the event requirements of CTS 3.9.10.1 are not met and the withdrawn control rod is not insertable, an additional Required Action, ITS 3.10.4 Required Action B.2.1, will require action to be initiated immediately to fully insert all control rods.	3.10.4 Required Actions A.2.1, A.2.2, and B.2.1	LCO 3.9.10.1
M.2	CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, ITS applies an additional restriction to ensure the control rod position indication is OPERABLE (required to support the one-rod-out interlock).	LCO 3.10.4.b.1	N/A
	3.10.5, Single Control Rod Drive Removal Refueling		
M.1	Inputs to the one-rod-out interlock (rod position on the rod to be removed) must be overridden to remove the rod; thus, the one-rod-out interlock is not OPERABLE in this condition. To ensure only one rod is withdrawn, a new requirement that a control rod block is inserted has been added. This compensates for the inoperable one-rod-out interlock. To ensure no fuel is loaded (since refueling interlocks would preclude fuel movement with a withdrawn control rod), a new requirement that no other CORE ALTERATIONS can be in progress has been added. Surveillances have also been added to verify a control rod withdrawal block is inserted every 24 hours and no other CORE ALTERATIONS are in progress every 24 hours.	LCO 3.10.5.c, LCO 3.10.5.d, SR 3.10.5.3, SR 3.10.5.5	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.6, Multiple Control Rod Withdrawal Refueling			
M.1	Adds a Required Action such that, when the LCO is not met, all fuel loading must be suspended.	3.10.6 Required Action A.2	N/A
3.10.7, Control Rod Testing Operating			
M.1	Deletes statement that allows this Special Test Exception to be used during the startup test program, since the Startup Test Program has been completed at NMP2.	N/A	LCO 3.10.2.d
M.2	Deletes the flexibility to move control rods between 100% rod density and 75% rod density without verifying the movement is within the constraints of the established control rod pattern sequence when the RWM is bypassed.	N/A	4.10.2.a.2
3.10.8, SDM Test Refueling			
M.1	Adds a requirement to ensure adequate CRD charging water pressure is available. Also, adds an appropriate Surveillance Requirement.	LCO 3.10.8.f, SR 3.10.8.6	N/A
M.2	If an APRM Neutron Flux - Upscale, Setdown, Inoperable, or 2-out-of-4 voter channel is inoperable during Mode 5 when an SDM test is being performed, CTS allows the test to continue with an inoperable channel, provided the inoperable channel or the associated trip system is tripped within 12 hours. When more than one channel is inoperable, CTS continues to allow time to restore or trip the channel prior to requiring the SDM test to be suspended. ITS will require the SDM test to be immediately suspended by placing the reactor mode switch in shutdown or refueling.	3.10.8 ACTION B	3.3.1 Actions a and b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.10.1, Primary Containment Integrity			
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity.	N/A	3/4.10.1
Current Specification 3/4.10.4, Recirculation Loops			
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS and the Startup Test Program, to the requirement that recirculation loops be in operation.	N/A	3/4.10.4
Current Specification 3/4.10.5, Oxygen Concentration			
M.1	Deletes Specification that provides an exception, during the Startup Test Program, to the requirement to maintain oxygen concentration within limits.	N/A	3/4.10.5
Current Specification 3/4.10.6, Training Startups			
M.1	Deletes Specification that provides an exception, during training startups, to the requirement to maintain all ECCS subsystems Operable.	N/A	3/4.10.6

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Adds a new requirement to specify the nominal distance between fuel bundles seated in the new fuel storage racks.	4.3.1.2.c	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
5.1, Responsibility			
None	None	None	None
5.2, Organization			
None	None	None	None
5.3, Unit Staff Qualifications			
None	None	None	None
5.4, Procedures			
M.1	Adds requirement that all programs specified in ITS 5.5 have written procedures.	5.4.1.e	N/A
5.5, Programs and Manuals			
M.1	Adds two new programs, the Technical Specification Bases Control Program and the Safety Function Determination Program.	5.5.10, 5.5.11	N/A
M.2	Adds expanded requirements for the ODCM that identify monitoring activities and report requirements, and establish content and format for documenting licensee-initiated changes.	5.5.1.b, 5.5.1.c	N/A
5.6, Reporting Requirements			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
5.7, High Radiation Area			
None	None	None	None
Current Specification 6.4, Training			
None	None	None	None
Current Specification 6.5, Review and Audit			
None	None	None	None
Current Specification 6.6, Reportable Event Action			
None	None	None	None
Current Specification 6.7, Safety Limit Violation			
None	None	None	None
Current Specification 6.10, Records Retention			
None	None	None	None
Current Specification 6.11, Radiation Protection Program			
None	None	None	None

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 6.13, Process Control Program			
None	None	None	None
Current Specification 6.15, Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems			
None	None	None	None

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

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
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

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 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

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 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN					
None	None	None	None	None	None
3.1.2, Reactivity Anomalies					
3.1.2-LA.1	3.1.2 Action a	The requirement to perform an analysis to determine and explain the cause of the reactivity difference.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.3, Control Rod OPERABILITY					
3.1.3-LA.1	3.1.3.1 Actions a.1.b), b.1.b), and b.2, 3.1.3.6 Action a.2, 3.1.3.7 Action a.3.b)	Details of the recommended procedures for disarming control rod drives.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.3-LA.2	3.1.3.7 Actions a.1 and a.2	Details of methods for determining the position of a control rod.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.4, Control Rod Scram Times					
3.1.4-LA.1	4.1.3.2.c	ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS 4.1.3.2.c Surveillance Requirement of "10% of the control rods on a rotating basis". The details of what constitutes a representative sample are relocated.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.5, Control Rod Scram Accumulators					
None	None	None	None	None	None
3.1.6, Rod Pattern Control					
None	None	None	None	None	None
3.1.7, Standby Liquid Control System					
3.1.7-LA.1	4.1.5.d.1	The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve and the requirements on the replacement charges for explosive valve).	Bases	Bases Control Program in ITS Chapter 5	3

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.7-LA.2	4.1.5.d.1, 4.1.5.d.3	The details of the method for performing the Surveillance that verifies flow through the SLC subsystem into the reactor pressure vessel (by pumping demineralized water into the reactor vessel). The details of the method for performing the Surveillance that demonstrates all piping between the SLC storage tank and the pump suction is unblocked (by pumping from the storage tank to the test tank and then draining and flushing the piping with demineralized water).	Bases	Bases Control Program in ITS Chapter 5	3
3.1.7-LA.3	4.1.5.d.2	The testing requirements for SLC System relief valve setting verification.	IST Program	10 CFR 50.59 and 10 CFR 50.55a	5
3.1.7-LA.4	Figure 3.1.5-1	The contained tank volumes associated with the SLC storage tank low level and high level alarms.	USAR	10 CFR 50.59	1
3.1.8, SDV Vent and Drain Valves					
None	None	None	None	None	None
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support					
None	None	None	None	None	None

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.1.4.2, Rod Sequence Control System					
None	None	None	None	None	None

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 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE					
3.2.1-LA.1	3.2.1 Action	The requirement in the CTS 3.2.1 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.2.2, MINIMUM CRITICAL POWER RATIO					
3.2.2-LA.1	3.2.3, 4.2.3.a, 4.2.3.b	The details of the calculation and value of τ in CTS 3.2.3 and CTS 4.2.3.a and b is relocated to the Bases in the form of a discussion while the actual equations are incorporated into the COLR.	Bases COLR	Bases Control Program is ITS Chapter 5 COLR change control process described in Chapter 5 of the ITS	3
3.2.2-LA.2	3.2.3 Action c	The requirement in the CTS 3.2.3 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.3, LINEAR HEAT GENERATION RATE					
3.2.3-LA.1	3.2.4 Action	The requirement in the CTS 3.2.4 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.2.4, APRM Gain and Setpoint					
3.2.4-LA.1	3.2.2 Action	The requirement in the CTS 3.2.2 ACTION to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3

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 3.3 - 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
3.3.1.1-LA.4	Table 3.3.1-1 Notes (c) and (i)	The LPRM inputs (3 per level, 20 total) for OPERABILITY of the APRM; and the system design details describing that the Turbine Stop Valve—Closure and the Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure—Low Functions are automatically bypassed based on turbine first stage pressure when THERMAL POWER is less than 30% of RATED THERMAL POWER.	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-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." 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 (l).	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

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
3.3.1.2, SRM Instrumentation					
3.3.1.2-LA.1	4.3.7.6.c	The detail of the method for performing the Surveillance ("with the detector fully inserted").	Bases	Bases Control Program is ITS Chapter 5	3
3.3.1.2-LA.2	3.9.2 and 4.9.2.a.2, including footnote **	The details relating to SRM OPERABILITY; i.e., that the SRMs shall be inserted to the normal operating level with continuous indication in the control room.	Bases	Bases Control Program in ITS Chapter 5	1, 2
3.3.1.2-LA.3	3.9.2.d, including footnote ***, and 4.9.2.d	Requirements for the removal of RPS shorting links.	TRM	10 CFR 50.59	5
3.3.2.1, Control Rod Block Instrumentation					
3.3.2.1-R.1	Tables 3.3.6-1, 3.3.6-2, and 4.3.6-1 Functions 2, 3, 4 and 5	The SRM, IRM, Scram Discharge Volume, and Reactor Coolant System Recirculation Flow control rod block requirements.	TRM	10 CFR 50.59	5
3.3.2.1-LA.1	Table 3.3.6-1 Note (a)	The statement that the RBM shall be automatically bypassed when a peripheral control rod is selected is relocated. This is a design feature of the RBM.	USAR	10 CFR 50.59	1
3.3.2.1-LA.2	Table 4.3.6-1 Function 1 footnote c, 4.1.4.1.a, 4.1.4.1.b, 4.1.4.1.c	Details of the methods for performing surveillances (i.e., the RBM CFT includes the reactor manual control multiplexing system input and the RWM CFT includes verifying proper indication of the selection error of at least one out-of-sequence control rod and verifying inability to withdraw an out-of-sequence control rod).	Bases	Bases Control Program in ITS Chapter 5	3

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
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation					
None	None	None	None	None	None
3.3.3.1 Post Accident Monitoring Instrumentation					
3.3.3.1-R.1	Table 3.3.7.5-1 Instrument 6	Suppression Chamber Air Temperature Function requirements.	TRM	10 CFR 50.59	5
3.3.3.1-LA.1	Table 4.3.7.5-1 footnotes **, ***, †, and ††	Details of the method for performing the CHANNEL CALIBRATIONS for the Drywell Hydrogen Concentration Analyzers, PCIV Position Indications, and Drywell Radiation Monitors, and the CHANNEL CHECK for the PCIV Position Indications.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.3.2, Remote Shutdown System					
3.3.3.2-LA.1	3.3.7.4, including footnote *, 3.3.7.4 Action a and b, Table 3.3.7.4-1, Table 3.3.7.4-2, Table 4.3.7.4-1	Details relating to system design and operation (i.e., the specific instrument listings and the transfer switch requirements) are relocated to the TRM. The Bases also identifies that the instruments and transfer switches are required for OPERABILITY of the Remote Shutdown System and are listed in the TRM.	TRM	10 CFR 50.59	1

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.4.1, EOC-RPT Instrumentation					
3.3.4.1-LA.1	Table 3.3.4.2-1 footnote **, first sentence	The statement that Turbine Stop Valve—Closure and the Turbine Control Valve Fast Closure, Trip Oil Pressure—Low shall be automatically bypassed when turbine first stage pressure is less than or equal to the pressure equivalent to THERMAL POWER less than 30% of RATED THERMAL POWER.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.4.2, ATWS-RPT Instrumentation					
None	None	None	None	None	None
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

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
3.3.5.2, 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
3.3.6.1, Primary Containment Isolation Instrumentation					
3.3.6.1-R.1	Table 3.3.2-1 Trip Function 2.h	The RCIC Drywell Pressure – High Function requirements.	TRM	10 CFR 50.59	5
3.3.6.1-LA.1	4.3.2.2	The detail relating to methods (simulated automatic operation) for performing the LOGIC SYSTEM FUNCTIONAL TESTS.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.1-LA.2	Table 3.3.2-1 (the Valve Groups Operated By Signal Column), including Notes (a), (f), (g), and (h)	System design and operational details; i.e, the Valve Groups Operated By Signal Column and the logic description in Notes (a), (f), (g), and (h).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.6.1-LA.3	Table 3.3.2-4	PCIVs associated with each valve group and the associated isolation signals.	TRM	10 CFR 50.59	1

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.2, Secondary Containment Isolation Instrumentation					
3.3.6.2-LA.1	4.3.2.2, 4.6.5.3.d.2.b	The details relating to methods for performing the LOGIC SYSTEM FUNCTIONAL TEST (simulated automatic operation) and the system functional test of SGT system (use of simulated signals).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.2-LA.2	Table 3.3.2-1 Notes (c) and (d)	Details relating to system design and operation (i.e., specific valves and systems affected).	Bases	Bases Control Program in ITS Chapter 5	1
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

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
3.3.8.2, RPS Electric Power Monitoring-Logic					
None	None	None	None	None	None
3.3.8.3, RPS Electric Power Monitoring-Scram Solenoids					
None	None	None	None	None	None
Current Specification 3/4.3.7.1, Radiation Monitoring Instrumentation					
None-R.1	3/4.3.7.1	The Area Monitors Instrumentation requirements.	TRM	10 CFR 50.59	5
Current Specification 3/4.3.7.2, Seismic Monitoring Instrumentation					
None-R.1	3/4.3.7.2	The Seismic Monitoring Instrumentation requirements.	TRM	10 CFR 50.59	5
Current Specification 3/4.3.7.7, Traversing In-Core Probe System					
None-R.1	3/4.3.7.7	TIP System requirements, except for CTS 4.3.7.7.b and c which are moved to ITS 3.6.1.3 (see DOC A.1 for Current Specification 3/4.3.7.7).	TRM	10 CFR 50.59	5
Current Specification 3/4.3.7.8, Loose Part Detection System					
None-R.1	3/4.3.7.8	Loose Part Detection System requirements.	TRM	10 CFR 50.59	5

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
Current Specification 3/4.3.7.9, Radioactive Liquid Effluent Monitoring Instrumentation					
None-R.1	3/4.3.7.9	Radioactive Liquid Effluent Monitoring Instrumentation requirements.	ODCM	ODCM change control process in ITS Chapter 5	5
Current Specification 3/4.3.7.10, Radioactive Gaseous Effluent Monitoring Instrumentation					
None-R.1	3/4.3.7.10	Radioactive Gaseous Effluent Monitoring Instrumentation requirements.	ODCM	ODCM change control process in ITS Chapter 5	5
Current Specification 3/4.3.9, Plant Systems Actuation Instrumentation					
None-R.1	3/4.3.9	Service Water System Instrumentation requirements.	TRM	10 CFR 50.59	5

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 3.4 - 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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.1-LA.7	3.4.1.1 Actions c.2 and d	Maximum amount of time allowed (15 minutes) prior to initiating corrective action when THERMAL POWER is in the restricted zone with core flow ≤ 39% is relocated in the form of a discussion that action must be taken as soon as practicable to restore the parameter to within limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.1-LA.8	3.4.1.1 Action c.2	Details on how to restore APRM and LPRM noise levels within limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.1-LA.9	4.4.1.1.4	Requirement to obtain baseline APRM and LPRM neutron flux noise data when the region of concern is entered once after each refueling outage.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.2, Flow Control Valves (FCVs)					
None	None	None	None	None	None
3.4.3, Jet Pumps					
3.4.3-LA.1	4.4.1.2 footnote *	Statement that the specific "established" patterns are the patterns determined during the startup test program.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.4, Safety/Relief Valves (S/RVs)					
3.4.4-LA.1	3.4.2 footnote *	Details relating to lift setting pressure of the safety/relief valves; i.e., the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.	Bases	Bases Control Program in ITS Chapter 5	1

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
3.4.5, RCS Operational Leakage					
3.4.5-LA.1	4.4.3.2.1	Details of the methods for performing the reactor coolant system leakage Surveillance; i.e., by monitoring the primary containment airborne particulate and gaseous radioactivity and by monitoring the drywell floor drain tank and equipment drain tank fill rate.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.6, RCS Pressure Isolation Valve (PIV) Leakage					
3.4.6-LA.1	Table 3.4.3.2-1	List of pressure isolation valves.	TRM	10 CFR 50.59	1
3.4.6-LA.2	4.4.3.2.2.a	Requirement to leak test each PIV "At least once per 18 months".	IST Program	IST Program in ITS Chapter 5	3
3.4.6-LC.1	3.4.3.2 Actions d and e, 4.4.3.2.3, 4.4.3.2.4, Table 3.4.3.2-2	High/low pressure interface valve leakage pressure monitors and interlocks, along with supporting Actions and Surveillances.	TRM	10 CFR 50.59	5
3.4.7, RCS Leakage Detection Instrumentation					
None	None	None	None	None	None
3.4.8, RCS Specific Activity					
3.4.8-LA.1	Table 4.4.5-1, Item 5	Offgas isotopic analysis for xenon and krypton.	TRM	10 CFR 50.59	5

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
3.4.9, RHR Shutdown Cooling System - Hot Shutdown					
3.4.9-LA.1	LCO 3.4.9.1	Details of what constitutes an OPERABLE RHR shutdown cooling subsystem; i.e., each subsystem consists of one Operable RHR pump and heat exchanger.	Bases	Bases Control Program in ITS Chapter 5	1
3.4.9-LA.2	4.4.9.1	Detail of the method of verifying operation of the RHR shutdown cooling subsystem; i.e., circulating reactor coolant.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.10, RHR Shutdown Cooling System - Cold Shutdown					
3.4.10-LA.1	LCO 3.4.9.2	Details of what constitutes an OPERABLE RHR shutdown cooling subsystem; i.e., each subsystem consists of one Operable RHR pump and heat exchanger.	Bases	Bases Control Program in ITS Chapter 5	1
3.4.10-LA.2	4.4.9.2	Detail of the method of verifying operation of the RHR shutdown cooling subsystem; i.e., circulating reactor coolant.	Bases	Bases Control Program in ITS Chapter 5	3

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.11, RCS Pressure and Temperature (P/T) Limits					
3.4.11-LA.1	4.4.6.1.1, 4.4.6.1.2	The specific requirements in CTS 4.4.6.1.1 and CTS 4.4.6.1.2 that operation be to the right of the limits lines of Figures 3.4.6.1-1, 3.4.6.1-2, 3.4.6.1-3, 3.4.6.1-4, and 3.4.6.1-5. The allowance in CTS 4.4.6.1.2 and Figures 3.4.6.1-4 and 3.4.6.1-5 that with reactor water level in the normal power operation range, operation may be in the cross-hatched region of Figures 3.4.6.1-4 and 3.4.6.1-5, and the statement in Figures 3.4.6.1-1, 3.4.6.1-2, 3.4.6.1-3, 3.4.6.1-4, and 3.4.6.1-5 that the Figures are effective up to 12.8 EFPY.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.11-LA.2	Table 4.4.6.1.3-1	Requirements for reactor material irradiation surveillance specimen location, lead factor, and withdrawal time.	USAR	10 CFR 50.59	3
3.4.11-LA.3	4.4.1.1.2 footnote ***	Details relating to the basis for the THERMAL POWER and recirculation flow limitations; i.e., final values were determined during Startup Testing based upon actual THERMAL POWER and recirculation loop flow which will sweep the cold water from the vessel bottom head preventing stratification.	Bases	Bases Control Program in ITS Chapter 5	1
3.4.11-LA.4	3.4.1.4.b, 4.4.1.4	Details and associated Action relating to operational limits (maximum jet pump loop flow) during a return to two recirculation pump operation from single recirculation loop operation.	USAR	10 CFR 50.59	1
3.4.12, Reactor Steam Dome Pressure					
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
Current Specification 3/4.4.4, Chemistry					
None-R1	3/4.4.4	Entire specification containing requirements for reactor coolant system chemistry.	TRM	10 CFR 50.59	5
Current Specification 3/4.4.8, Structural Integrity					
None-R1	3/4.4.8	Entire specification containing requirements for structural integrity of the ASME Code Class 1, 2, and 3 components.	TRM	10 CFR 50.59	5

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 3.5 - 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

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
3.6.1.1, Primary Containment					
None	None	None	None	None	None
3.6.1.2, Primary Containment Air Locks					
3.6.1.2-LA.1	3.6.1.3.a	The details comprising OPERABILITY of the air lock (i.e., both doors closed except during entry and exit, then at least one door closed).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.1.3, Primary Containment Isolation Valves					
3.6.1.3-LA.1	4.6.3.3	The requirement to stroke time test the power operated, non-automatic, PCIVs.	IST Program	10 CFR 50.59 and 10 CFR 50.55a	5
3.6.1.3-LA.2	4.6.3.5.b, 4.3.7.7.c	Requirements concerning the replacement charges for the traversing in-core probe (TIP) explosive valves (i.e., replacement charge shall be from the same batch or from another batch that has had one charge fired, no charge shall remain in use past its shelf-life and generating life, and the charges shall be replaced in accordance with the manufacturer's recommendations).	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3-LA.3	Table 3.6.1.2-1, 4.6.1.7.2, 3.6.1.2.d, 3.6.1.2 Action d, 4.6.1.2.2, 4.6.1.7.2	The allowable leak rates through resilient seal purge valves in potential bypass leakage paths and the leak rate test pressures.	Bases	Bases Control Program in ITS Chapter 5	1

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 a functional test of each primary containment automatic isolation valve (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
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
3.6.1.7, Suppression Chamber-to-Drywell Vacuum Breakers					
3.6.1.7-LA.1	3.6.4	The detail comprising what "OPERABLE" means (i.e., closed) for the suppression chamber-to-drywell vacuum breakers.	Bases	Bases Control Program in ITS Chapter 5	1
3.6.1.7-LA.2	4.6.4.b.3.a)	The detail that the opening Setpoint is verified from the closed position.	Bases	Bases Control Program in ITS Chapter 5	3
3.6.2.1, Suppression Pool Average Temperature					
None	None	None	None	None	None
3.6.2.2, Suppression Pool Water Level					
3.6.2.2-LA.1	3.6.2.1.a.1, 3.5.3.a	The suppression pool volumes which correspond to the level limits.	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.3, RHR Suppression Pool Cooling					
3.6.2.3-LA.1	3.6.2.3	The details relating to system OPERABILITY (i.e., the suppression pool cooling function is designated as two "independent" loops, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1

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 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.4.2, Secondary Containment Isolation Valves					
3.6.4.2-LA.1	3.6.5.2, Table 3.6.5.2-1	Relocates the list of secondary containment isolation dampers and their isolation times. In addition, due to the relocation, the name of the isolation dampers has been generically changed to Secondary Containment Isolation Valves (SCIV).	TRM	10 CFR 50.59	1
3.6.4.3, Standby Gas Treatment System					
3.6.4.3-LA.1	3.6.5.3	The detail relating to system design (i.e., that the SGT subsystems are "independent").	Bases	Bases Control Program in ITS Chapter 5	1
3.6.4.3-LA.2	4.6.5.3.a, 4.6.5.3.d.2.a	Details in CTS 4.6.5.3.a of the methods for performing the standby gas treatment subsystem 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers) and CTS 4.6.5.3.d.2.a (verifying manual initiation from the control room).	Bases	Bases Control Program in ITS Chapter 5	3

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 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.1, Service Water System and Ultimate Heat Sink					
3.7.1-LA.1	LCO 3.7.1.1	Details relating to system OPERABILITY; i.e., that the SW subsystems shall have two SW pumps capable of taking a suction from Lake Ontario and transferring the water to the associated safety related equipment and that the intake deicing heater system shall have 14 heaters in operation in each intake structure per division.	Bases	Bases Control Program in ITS Chapter 5	1
3.7.1-LA.2	4.7.1.1.1.e.1, 4.7.1.1.1.e.2, 4.7.1.1.1.e.3, 4.7.1.1.2.b (including footnote *), 4.7.1.1.2.c	Details relating to methods for performing Surveillances; i.e., verifying each automatic valve servicing non-safety related equipment, each SW System cross connect valve, and each pump discharge valve actuates to its isolation position; verifying each SW pump starts automatically and the associated pump discharge valve opens automatically; verifying the current of the intake deicing heater feeder cables is ≥ 20 amps, adjusted to degraded voltage conditions, when 14 heaters are in operation; and verifying the resistance of each intake deicing heater feeder cable is ≥ 28 ohms.	Bases	Bases Control Program in ITS Chapter 5	3
3.7.1-LA.3	4.7.1.1.1.f.2	Requirement for SW pump flow testing to be performed every 18 months.	Inservice Testing Program	10 CFR 50.55a, 10 CFR 50.59	5
3.7.2, Control Room Envelope Filtration (CREF) System					
3.7.2-LA.1	LCO 3.7.3	Details relating to system design; i.e., that the CREF subsystems are "independent."	Bases	Bases Control Program in ITS Chapter 5	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.2-LA.2	4.7.3.b	Details of the methods for performing the CREF System 31 day operating Surveillance; i.e., by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers.	Bases	Bases Control Program in ITS Chapter 5	3
3.7.4, Main Condenser Offgas					
3.7.4-LA.1	4.11.2.7.1	Requirement to continuously monitor radioactivity rate of noble gases downstream of the recombiner.	ODCM	ODCM Control Process in ITS Chapter 5	5
3.7.4-LA.2	4.11.2.7.2	Details defining the methods for performing this Surveillance and methods for determining when an increase has occurred are relocated to the Bases. In addition, the proper name for the monitor has been provided in the Bases.	Bases	Bases Control Program in ITS Chapter 5	3
3.7.5, Main Turbine Bypass System					
3.7.5-LA.1	4.7.7.a	Details relating to methods of performing the main turbine bypass system functional test (e.g., simulated automatic actuation.)	Bases	Bases Control Program in ITS Chapter 5	3
3.7.5-LA.2	4.7.7.b	Details of the actual TURBINE BYPASS SYSTEM RESPONSE TIME.	TRM	10.CFR 50.59	1
3.7.6, Spent Fuel Storage Pool Water Level					
3.7.6-LA.1	3.9.9 Action	Requirement to suspend crane operations with loads when the spent fuel storage pool water level is not within the limit.	USAR	10 CFR 50.59	5

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.7.1.2, Plant Service Water System - Shutdown					
None-LA.1	3/4.7.1.2	LCO requirements, Actions, and Surveillance Requirements for the Service Water (SW) System when in Modes 4 and 5.	TRM	10 CFR 50.59	5
Current Specification 3/4.7.2, Revetment-Ditch Structure					
None-R.1	3/4.7.2	Revetment-Ditch Structure LCO, Actions, and Surveillance Requirements.	TRM	10 CFR 50.59	5
Current Specification 3/4.7.5, Snubbers					
None-LA.1	3/4.7.5	Snubber inspection and testing requirements.	TRM	10 CFR 50.59	5
Current Specification 3/4.7.6, Sealed Source Contamination					
None-R.1	3/4.7.6	Sealed Source Contamination requirements.	TRM	10 CFR 50.59	5
Current Specification 3/4.11.1.1, Concentration					
None-R.1	3/4.11.1.1	Liquid Effluents Concentration requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.1.2, Dose					
None-R.1	3/4.11.1.2	Liquid Effluents Dose requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.11.1.3, Liquid Radwaste Treatment System					
None-R.1	3/4.11.1.3	Liquid Radwaste Treatment System requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.2.1, Dose Rate					
None-R.1	3/4.11.2.1	Gaseous Effluents Dose Rate requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.2.2, Dose - Noble Gases					
None-R.1	3/4.11.2.2	Gaseous Effluents Dose - Noble Gases requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.2.3, Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form					
None-R.1	3/4.11.2.3	Gaseous Effluents Dose - I-131, I-133, Tritium, and radioactive material in particulate form requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.2.4, Gaseous Radwaste Treatment System					
None-R.1	3/4.11.2.4	Gaseous Radwaste Treatment System requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.11.2.5, Ventilation Exhaust Treatment System					
None-R.1	3/4.11.2.5	Gaseous Effluents Ventilation Exhaust Treatment System requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.2.8, Venting or Purging					
None-R.1	3/4.11.2.8	Gaseous Effluent Venting or Purging requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.11.3, Solid Radioactive Wastes					
None-R.1	3/4.11.3	Solid Radioactive Wastes requirements.	Process Control Program	10 CFR 50.59	5
Current Specification 3/4.11.4, Total Dose					
None-R.1	3/4.11.4	Total Dose requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.12.1, Monitoring Program					
None-R.1	3/4.12.1	Radiological Environmental Monitoring Program requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.12.2, Land Use Census					
None-R.1	3/4.12.2	Land Use Census requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5
Current Specification 3/4.12.3, Interlaboratory Comparison Program					
None-R.1	3/4.12.3	Interlaboratory Comparison Program requirements.	ODCM	ODCM Control Process in ITS Chapter 5	5

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 3.8 - 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	Not used.	N/A	N/A	N/A
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
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 "within 10 seconds" for Division 3.	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
3.8.2, 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
3.8.4-LA.3	4.8.2.1.d	The details of the DC loads and the licensed service duration for the battery service test.	USAR	10 CFR 50.59	1
3.8.4-LA.4	4.8.2.1.f	Specific limits on battery degradation and guidance on the intent of the term "degradation".	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
3.8.5, DC Sources Shutdown					
3.8.5-LA.1	LCO 3.8.2.2	Details relating to system OPERABILITY (what constitutes a required DC electrical power source) relocated to Bases and battery identification numbers relocated to USAR.	Bases USAR	Bases Control Program in ITS Chapter 5 10 CFR 50.59	1
3.8.6, Battery Cell Parameters					
3.8.6-LA.1	4.8.2.1.b.3	Details relating to the plant specific determination of "representative" are relocated, since IEEE-450 requires only "representative" cells be measured for temperature and every sixth cell is provided as a suggestion only in IEEE-450.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.7, Inverters Operating					
3.8.7-LA.1	LCO 3.8.3.1 including footnote	The details concerning the OPERABILITY requirements of the inverters (energized by the DC Supply) relocated to Bases and the inverter equipment identification numbers relocated to USAR.	Bases USAR	Bases Control Program in ITS Chapter 5 10 CFR 50.59	1
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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
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
Current Specification 3/4.8.4.2, Primary Containment Penetration Conductor Overcurrent Protective Devices					
None - R.1	3/4.8.4.2	Primary containment penetration conductor overcurrent protective devices requirements.	TRM	10 CFR 50.59	5

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
Current Specification 3/4.8.4.3, Emergency Lighting System Overcurrent Protective Devices					
None - R.1	3/4.8.4.3	Emergency Lighting System overcurrent protective devices requirements.	TRM	10 CFR 50.59	5

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 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.1, Refueling Equipment Interlocks					
3.9.1-R.1	LCO 3.9.1.b.4	Requirements for the fuel grapple position refueling equipment interlock function.	TRM	10 CFR 50.59	5
3.9.2, Refuel Position One-Rod-Out Interlock					
3.9.2-LA.1	Table 3.3.6-1 Function 6.b	Detail relating to the number of required Reactor Mode Switch Refuel Mode channels (i.e., 2 channels are required).	Bases	Bases Control Program in ITS Chapter 5	1
3.9.3, Control Rod Position					
None	None	None	None	None	None
3.9.4, Control Rod Position Indication					
None	None	None	None	None	None
3.9.5, Control Rod OPERABILITY Refueling					
None	None	None	None	None	None
3.9.6, RPV Water Level Irradiated Fuel					
3.9.6-LA.1	3.9.8 Action	Allowance to place all fuel assemblies in a safe condition prior to suspending load movement in the event of low water level.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.7, RPV Water Level New Fuel or Control Rods					
3.9.7-LA.1	3.9.8 Action	Allowance to place all new fuel assemblies and control rods in a safe condition prior to suspending movement in the event of low water level.	Bases	Bases Control Program in ITS Chapter 5	3
3.9.8, Residual Heat Removal (RHR) High Water Level					
3.9.8-LA.1	LCO 3.9.11.1	Details of what constitutes an OPERABLE RHR shutdown cooling subsystem; i.e., each subsystem consists of one Operable RHR pump and heat exchanger.	Bases	Bases Control Program in ITS Chapter 5	1
3.9.8-LA.2	4.9.11.1	Detail of the method of verifying operation of the RHR shutdown cooling subsystem; i.e., circulating reactor coolant.	Bases	Bases Control Program in ITS Chapter 5	3
3.9.9, Residual Heat Removal (RHR) Low Water Level					
3.9.9-LA.1	LCO 3.9.11.2	Details of what constitutes an OPERABLE RHR shutdown cooling subsystem; i.e., each subsystem consists of one Operable RHR pump and heat exchanger.	Bases	Bases Control Program in ITS Chapter 5	1
3.9.9-LA.2	4.9.11.2	Details of the method of verifying operation of the RHR shutdown cooling subsystem; i.e., circulating reactor coolant.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.9.4, Decay Time					
None-LA.1	3/4.9.4	24 hour decay time following subcriticality required prior to moving irradiated fuel in the reactor vessel.	TRM	10 CFR 50.59	5
Current Specification 3/4.9.5, Communications					
None-R.1	3/4.9.5	Entire Specification which requires: "Direct communication shall be maintained between the control room and refueling floor personnel."	TRM	10 CFR 50.59	5
Current Specification 3/4.9.6, Refueling Platform					
None-R.1	3/4.9.6	Entire Specification which requires: "The refueling platform shall be OPERABLE and used for handling fuel assemblies or control rods within the reactor pressure vessel."	TRM	10 CFR 50.59	5
Current Specification 3/4.9.7, Crane Travel Spent Fuel Storage Pool					
None-R.1	3/4.9.7	Entire Specification which requires: "Loads in excess of 1000 pounds shall be prohibited from travel over fuel assemblies in the spent fuel storage pool racks unless handled by a single failure-proof handling system."	TRM	10 CFR 50.59	5

CHANGE TYPE

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

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 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.1, System Leakage and Hydrostatic Testing Operation					
3.10.1-LA.1	3.10.7	The maximum temperature allowed during the system leakage or hydrostatic test (212°F).	USAR	10 CFR 50.59	3
3.10.2, Reactor Mode Switch Interlock Testing					
3.10.2-LA.1	Table 1.2 footnote *, 4.9.1.2 and 4.9.1.3 footnote *	The method used to verify control rods remain fully inserted (by verification using a second licensed operator or other technically qualified member of the unit technical staff).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.3, Single Control Rod Withdrawal Hot Shutdown					
None	None	None	None	None	None
3.10.4, Single Control Rod Withdrawal Cold Shutdown					
3.10.4-LA.1	LCO 3.9.10.1.d, 4.9.10.1.d	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.5, Single Control Rod Drive Removal Refueling					
3.10.5-LA.1	LCO 3.9.10.1.d, 4.9.10.1.d	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.6, Multiple Control Rod Withdrawal Refueling					
3.10.6-LA.1	LCO 3.9.10.2.f footnote *, 4.9.10.2.1.f footnote *	Requirements for the removal of RPS shorting links.	TRM	10 CFR 50.59	5
3.10.7, Control Rod Testing Operating					
None	None	None	None	None	None
3.10.8, SDM Test Refueling					
None	None	None	None	None	None
Current Specification 3/4.10.1, Primary Containment Integrity					
None	None	None	None	None	None
Current Specification 3/4.10.4, Recirculation Loops					
None	None	None	None	None	None
Current Specification 3/4.10.5, Oxygen Concentration					
None	None	None	None	None	None

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.10.6, Training Startups					
None	None	None	None	None	None

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
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
4.0-LA.1	5.1	The description of the site location.	USAR	10 CFR 50.59	1
4.0-LA.2	5.1.3	The specific details of the boundary for the UNRESTRICTED AREA for radioactive gaseous and liquid effluents.	USAR	10 CFR 50.59	1
4.0-LA.3	5.2.1, 5.2.2, 5.2.3, 5.4, 5.4.1, 5.4.2	Primary containment configuration and design details, primary containment design temperatures and pressures, secondary containment design details, and the Reactor Coolant System design pressure, temperature, and volume.	USAR	10 CFR 50.59	1
4.0-LA.4	5.3.2	The nominal active control rod assembly absorber length.	USAR	10 CFR 50.59	1
4.0-LA.5	5.5	The Meteorological Tower location requirements.	USAR	10 CFR 50.59	1
4.0-LA.6	Figure 5.1.3-1	The following Notes and additional information of CTS Figure 5.1.3-1: Note (b) specifies the height of the NMP2 stack; Note (e) specifies that the NMP2 Radioactive Liquid Discharge is on the "bottom" of Lake Ontario; additional information on CTS Figure 5.1.3-1 includes the height of the NMP2 Reactor Building Vent, and that the Energy Information Center, adjoining picnic area, and Lake Road are unrestricted areas within the site boundary accessible to members of the public.	USAR	10 CFR 50.59	1

TABLE R - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX
CHAPTER 4.0 - DESIGN FEATURES

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
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 Operater 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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.2-LA.5	6.2.2.f	Details that require all Core Alterations to be supervised by either a licensed Senior Operator or Senior Reactor Operator Limited to Fuel Handling; and the details that require the fuel moves to be directly monitored by a member of the reactor analyst group.	USAR	10 CFR 50.59	5
5.2-LA.6	6.2.2.j	Details of the operator license requirements for these specific positions: Station Shift Supervisor - Nuclear and Assistant Station Shift Supervisor Nuclear.	USAR	10 CFR 50.59	5
5.2-LA.7	6.2.3	The Independent Safety Engineering Group requirements.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5
5.2-LA.8	6.2.1.b, 6.2.1.c, 6.2.2.i, 6.2.2.j	The specific title "Chief Nuclear Officer" is replaced with the generic term "a specified corporate officer;" the specific title "Plant Manager" is replaced with the generic title "plant manager;" the specific title "Vice President - Nuclear Generation" is replaced with the generic term "a specified corporate officer;" the specific titles "General Supervisor Operations" and "Supervisor Operations" are replaced with the generic title "operations supervisors." The specific titles are relocated.	USAR	10 CFR 50.59	5
5.3, Unit Staff Qualifications					
5.3-LA.1	6.3	The specific title "Manager Radiation Protection" is replaced with the generic title "radiation protection manager." The specific title is relocated.	USAR	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
		5.4, 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.	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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.5-LA.8	5.7	Details of the components governed by the Component Cyclic or Transient Limit specification.	USAR	10 CFR 50.59	3
5.5-LA.9	6.5.2.11	The specific title "Plant Manager" is replaced with the generic title "plant manager" with the specific title relocated.	USAR	10 CFR 50.59	5
5.6, Reporting Requirements					
5.6-LA.1	6.9.1.1, 6.9.1.2, 6.9.1.3	The details associated with the Startup Report specification.	USAR	10 CFR 50.59	3
5.6-LA.2	6.9.1.9.a.3)	The detail associated with the MCPR Specification that is addressed in the Core Operating Limits Report.	Bases	Bases Control Program in Chapter 5 of the ITS	3
5.7, High Radiation Area					
None	None	None	None	None	None
Current Specification 6.4, Training					
None-LA.1	6.4	The details on training and replacement training for the unit staff; and the fire brigade requirement with respect to training.	USAR	10 CFR 50.59	5
Current Specification 6.5, Review and Audit					
None-LA.1	6.5	The details of the Review and Audit specification.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 6.6, Reportable Event Action					
None-LA.1	6.6.b	The requirements of CTS 6.6.b; Reportable Events reviews by SORC and submittal of the results of the reviews to the SRAB and the Vice President - Nuclear Generation.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5
Current Specification 6.7, Safety Limit Violation					
None-LA.1	6.7.a, 6.7.b, 6.7.c	The requirement for notification of the Vice President - Nuclear Generation and the SRAB in the event of a Safety Limit violation, the requirement for the SORC to review the Safety Limit Violation Report, and the requirement to submit the Safety Limit Violation Report to the SRAB and the Vice President - Nuclear Generation.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5
Current Specification 6.10, Records Retention					
None-LA.1	6.10	The details contained in the Record Retention specification.	Appendix B of the USAR Quality Assurance Program description	10 CFR 50.54 (a)	5
Current Specification 6.11, Radiation Protection Program					
None-LA.1	6.11	Requirement that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.	USAR	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
Current Specification 6.13, Process Control Program (PCP)					
None-LA.1	1.32, 6.13	The details contained in the PROCESS CONTROL PROGRAM specification and the definition of PROCESS CONTROL PROGRAM.	USAR	10 CFR 50.59	5
Current Specification 6.17, Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment System					
None	None	None	None	None	None

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

The Commission has prepared an Environmental Assessment related to the action and has determined not to prepare an environmental impact statement. Based upon the environmental assessment, the Commission has concluded that the issuance of the amendment will not have a significant effect on the quality of the human environment (64 FR 70073).

For further details with respect to the action see (1) the application for amendment 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), September 30, 1999 (NMP2L 1900), December 14, 1999 (NMP2L 1917), January 6, 2000 (NMP2L 1923), January 17, 2000 (NMP2L 1925), January 21, 2000 (NMP2L-1928), and January 31, 2000 (NMP2L1929), (2) Amendment No. 91 to Facility Operating License No. NPF-69, (3) the Commission's related Safety Evaluation, and (4) the Commission's Environmental Assessment. All of these are available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street NW, Washington, DC, and accessible electronically through the ADAMS Public Electronic Reading Room link at the NRC Web Site (http://www.nrc.gov).

Dated at Rockville, Maryland, this 15 day of February 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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UNITED STATES NUCLEAR REGULATORY COMMISSION

NIAGARA MOHAWK POWER CORPORATION

DOCKET NO. 50-410

NOTICE OF ISSUANCE OF AMENDMENT TO

FACILITY OPERATING LICENSE

The U.S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 91 to Facility Operating License No. NPF-69 issued to Niagara Mohawk Power Corporation (the licensee), which revised the Operating License and Technical Specifications (TSs) for operation of the Nine Mile Nuclear Point Station, Unit 2, (NMP2) located in Oswego County, New York. The amendment is effective as of the date of issuance.

The amendment implements a full conversion of the NMP2 TSs to a set of TS based upon NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4," Revision 1, dated April 1995 and NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6," Revision 1, dated April 1995 and grants a request for additional ITS items described in the following Federal Register notices: 1) October 16, 1998 (64 FR 56518) and 2) October 16, 1999 (64 FR 67336).

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment.

Notice of Consideration of Issuance of Amendment to Facility Operating License and Opportunity for a Hearing in connection with this action was published in the FEDERAL REGISTER on October 20, 1999 (64 FR 56518). No request for a hearing or petition for leave to intervene was filed following this notice.

The Commission has prepared an Environmental Assessment related to the action and has determined not to prepare an environmental impact statement. Based upon the environmental assessment, the Commission has concluded that the issuance of the amendment will not have a significant effect on the quality of the human environment (64 FR 70073).

For further details with respect to the action see (1) the application for amendment 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), September 30, 1999 (NMP2L 1900), December 14, 1999 (NMP2L 1917), January 6, 2000 (NMP2L 1923), January 17, 2000 (NMP2L 1925), January 21, 2000 (NMP2L-1928), and January 31, 2000 (NMP2L1929), (2) Amendment No. 91 to Facility Operating License No. NPF-69, (3) the Commission's related Safety Evaluation, and (4) the Commission's Environmental Assessment. All of these are available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street NW, Washington, DC, and accessible electronically through the ADAMS Public Electronic Reading Room link at the NRC Web Site (http://www.nrc.gov).

Dated at Rockville, Maryland, this 15th day of February 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

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