

PACKAGE 3.7
PLANT SYSTEMS
PART F

JUSTIFICATION FOR DIFFERENCES
(JFD)

from

NUREG-1431
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
UNITS 1 AND 2

Improved Technical Specifications
Conversion Submittal

010377 2/84

PART F
PACKAGE 3.7
PLANT SYSTEMS

**JUSTIFICATION FOR DIFFERENCES FROM IMPROVED STANDARD
TECHNICAL SPECIFICATIONS (NUREG-1431) AND BASES**

See Part E for specific proposed wording and location of referenced deviations.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	111	CTS requires PI to have all MSSVs operable or the unit is required to shut down. PI is retaining these provisions and thus the affected portions of Specification 3.7.1 and Bases have been revised. Because PI is retaining these requirements, TSTF - 235, which mostly deals with graduated plant power levels associated with inoperable MSSVs, has generally not been incorporated in this Specification and Bases. However, the statement of the LCO has been revised to be consistent with TSTF - 235 since this is an improvement which applies without the provisions for graduated power levels.
CL	112	Since PI intends to require all MSSV to be operable, it is unacceptable to allow more than one MSSVs to be inoperable at any given time and keep the plant operating. Therefore, use of Separate Condition entry is not appropriate and has not been included in the PI ITS.

Difference Category	Difference Number 3.7-	Justification for Differences
	113	Not used.
PA	114	Since PI only has two MSIV, the affected portions of Specification 3.7.2 have been revised accordingly. Since plant operation is not possible with one or both MSIVs inoperable, the Note allowing Separate Condition entry is also deleted.
CL	115	The Applicability modifier "de-activated" is not included since CTS requirements do not apply in MODE 3 when both MSIVs are closed. They are not required to be de-activated, since they can not be re-opened without manually opening the bypass valve.
	116	Not used.
TA	117	SR 3.7.2.1 and SR 3.7.3.1 are revised to separate the closure time testing and the actuation signal testing into separate surveillances. These changes incorporate TSTF-289.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	118	The MFIV are not the subject of the CTS and PI only credits the MFIVs for containment isolation, which is addressed by ITS 3.6.3, and backup for MFRVs. Therefore, the MFIVs are not included in this specification. The MFRVs and associated bypass valves are not the subject of CTS (other than the safety related isolation circuits) and thus all facets of this specification are new for PI.
PA	119	Since PI only has two feedwater trains, the "four" has been changed to "two" and "more" has been revised to "both" in the affected portions of the specification.
PA	120	The CTS does not include an isolation time for the MFRVs; therefore a time limit is not specified in Specification 3.7.3 or SR 3.7.3.1. This limit will be specified in the Inservice Test Program as stated in the Bases.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	121	<p>MODE 3 has been included in the Applicability and the other conditions of applicability have not been included. Under ITS rules of use, if this specification is not applicable when the valves are closed and deactivated or manually isolated, then Required Action A.2 would never be entered, since implementation of Required Action A.1 would cause the plant to exit this Specification. Since it is prudent to periodically verify that the valve(s) is closed in accordance with A.2, this situation has been remedied by not including the other specified conditions of applicability and a Note is included which states LCO 3.0.4 does not apply. Conditions A and B have also been modified to require the inoperable valve to be placed in manual or flow otherwise isolated to assure that the valve performs its safety function.</p>
PA	122	<p>As discussed previously in PA3.7-121, a Note is included which states LCO 3.0.4 is not applicable. This will assure that the operators are aware that the plant can ascend in power when one or more of these valves are inoperable. This is acceptable since the valve is performing its safety function when it is closed although it is not operable. Furthermore, the response to a MSLB is less severe as power increases due to the decrease in programmed SG inventory and therefore it is acceptable to increase power level with an inoperable valve.</p>

Difference Category	Difference Number 3.7-	Justification for Differences
CL	123	Since the MFIVs are not included in this specification there is only a single valve in each flow path and therefore, Action Statement D is not applicable.
CL	124	NUREG-1431 Specification 3.7.3, according to the Bases, is the system which provides a method for cooling the unit to RHR entry conditions if the condenser is not available. At PI, the SG PORVs provide this capability and therefore the specification title and other affected portions of this Specification and associated Bases have been revised to "SG PORV". The number of SG PORVs required OPERABLE is two since PI has only two per unit (one per steam generator).
CL	125	CTS only require SG PORVs to be operable in MODES 1, 2, and 3. Therefore, the Applicability and Required Action C.2 and associated Bases have removed restrictions associated with MODE 4. CTS require the unit to be placed in MODE 4 within 12 hours after Required Action and associated Completion Time not met; therefore, 12 hours is included in the ITS. TSTF-352, Revision 1 has not been included.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	126	The CTS does not include surveillance requirements for the SG PORV block valves since these are manual valves. Therefore, this SR is not included in the PI ITS. The intent of this SR is met since these valves are cycled for testing of the associated SG PORV.
PA	127	PI has two trains of AFW for each unit. Therefore, this specification is written to require two AFW trains.
CL	128	This change adds a Note to the LCO and Bases which will allow the system to operate and still be considered OPERABLE for safety related requirements. PI requires this Note to incorporate NRC TS interpretation issued to NSP October 16, 1997. Since PI has only two trains of AFW per unit and the AFW system is required to operate as part of normal plant startup and shutdown, this change is required. This change is consistent with TSTF- 245, Revision 1 (See TA3.7-136).
CL	129	CTS only requires the AFW system to be operable in MODES 1, 2, and 3; therefore the applicability requirements for MODE 4 are not included. Also, the related clause for Condition B and all of Condition E have been deleted.

Difference Category	Difference Number 3.7-	Justification for Differences
X	130	This ITS conversion LAR proposes to require testing of the SG PORV at the interval specified in the IST Program. The IST Program, which is approved by the NRC, currently requires the SG PORV to be tested quarterly. A change in this interval would be reviewed and approved by the NRC. This interval is more frequent than the bracketed 18 month interval in NUREG-1431. This change is also discussed in DOC L3.7-95.
CL	131	The Completion Time limit of "10 days from the discovery of failure to meet the LCO" was not included in the ITS and Bases since PI does not have this requirement in the CTS. The intent of adding this limit to the Completion Time is to prevent a plant from continuously being in the LCO without ever meeting the full AFW system requirements. This abuse of the LCO can be adequately addressed in plant procedures. Furthermore, the AFW system operability is monitored under the Maintenance Rule (10CFR50.65). For the three year period of 1995, 1996 and 1997, the AFW system has been out of service less than 2% of the time. From this data it is evident that PI has not abused the use of Allowed Outage Time for the AFW system. Including this clause in the ITS would serve no purpose and may cause operator confusion.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	132	The Completion Time to be in MODE 4 is 12 hours to be consistent with CTS requirements after Required Actions and Completion Times not met.
CL	133	Since PI only has two trains of AFW and they are only required to be operable in MODES 1, 2, and 3, these Conditions have been modified accordingly.
CL	134	The Note which specifies when the SR is required to be performed is modified to incorporate CTS requirements which specifies the pump test must be performed prior to 10% power or within 72 hours after RCS temperature exceeds 350°F.
TA	135	This change incorporates approved industry traveler, TSTF-101.
TA	136	This change incorporates TSTF- 245, Revision 1. The Bases SR discussion of the SR Note was modified to specifically state the Modes during which the AFW system is operated to avoid confusing the operators.
X	137	The SR interval is increased to 24 months to support the proposed PI refueling cycle.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	138	The SR Note stating "Not applicable in MODE 4 when steam generator is relied upon for heat removal." is not included. CTS do not include provision for performing the TDAFW train test after heatup as allowed by this Note. PI performs this test in overlapping phases to verify that the system responds correctly. Therefore, this Note is not included.
PA	139	NUREG-1431 Bases state that this SR is not required for units which use AFW for normal startup and shutdown. Therefore this SR is not included in the PI ITS.
CL	140	This SR is modified by a Note that limits applicability of the SR to those valves which perform a safety function consistent with the safety function of the system. This system supports many non-safety related systems and valves in the non-safety related portions of the system do not require the verifications specified in this SR. This Note is also discussed in the Bases.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	141	PI has three condensate storage tanks which are interconnected to commonly serve both PI units. Thus, these tanks form a system which is shared between PI Units 1 and 2. Therefore, an "s" has been added to "CST" in the title and Condition A to show it is the system of tanks, not just one tank, that is under consideration. Since this is a shared system, its operability affects both units, so an ACTION statement Note has been included indicating that the Conditions and Required Actions apply to both units. Since PI has a single TS which applies to both units, this change is included to assure that this specification does not cause any operator confusion.
TA	142	This change incorporates approved traveler, TSTF-140 which requires the CSTs to be operable rather than specifying tank contents.
CL	143	CTS requires CSTs operable when either unit is in MODE 1, 2, or 3. Therefore, MODE 4 operability requirements are not included in the PI CTS. This is acceptable since in MODE 4, the pressure and temperature limitation are such that the probability for a design basis event requiring plant cool down using SG PORVs is low. Also, in MODE 4 the RHR system is available to provide adequate decay heat removal. The associated Bases have also been modified to be consistent with these changes.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	144	The CTS value of 12 hours is provided.
PA	145	The plant abbreviation for the component cooling water system is "CC". Therefore, the "W" has been removed from the system abbreviation throughout this specification and the Bases.
PA	146	The PI system which provides a heat sink for removal of process and operating heat from safety related components during a design basis accident is the Cooling Water System (CL). During normal operation and normal shutdown, the CL system also provides a heat sink for various safety related and nonsafety related components. This Specification and its associated Bases have been revised throughout to incorporate this title and abbreviation change.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	147	<p>A new Condition and associated Bases have been included to address the CTS allowed condition when two safeguards CL pumps are inoperable; that is, one CL header does not have an operable CL pump. Appropriate actions are provided which, in combination with ITS LCO 3.0.6 and the SFDP, will require the same actions as the CTS. The Required Actions are modified by Notes which are consistent with the guidance of NUREG-1431 or implement CTS requirements. These Notes account for the PI specific design in which the Unit 1 diesel generators are dependent upon the CL for jacket cooling.</p>
CL	148	<p>The NUREG-1431 Condition and associated Bases, addressing an inoperable train, were modified to incorporate CTS requirements for an inoperable header. These requirements are the same as CTS except for changes required to conform to the ISTS format (such changes were addressed in Part D, Discussion of Changes to CTS). Note 1 of the NUREG-1431 only applies to Unit 1 because the Unit 2 safeguards diesels do not use the CL system as a heat sink. Note 2 may apply to both units depending on their configuration when this condition is entered. The modified Required Actions, when combined with ITS LCO 3.0.6 and the SFDP, implement the CTS requirements for one inoperable header.</p>

Difference Category	Difference Number 3.7-	Justification for Differences
CL	149	The CL system at PI is a shared system which supports the operation of both units. Since PI has one set of TS which applies to both units, those provisions of the specifications which apply collectively to both units are noted accordingly. Thus this Required Action and associated Bases are modified by a Note that states the operation of both units is impacted.
TA	150	This change incorporates TSTF - 340, Revision 3. Modification of the Bases inserts have been made to reflect the PI AFW system design features.
CL	151	Two SRs and associated Bases, which are not provided in NUREG-1431, are included to incorporate CTS requirements for testing CL pump operability. Since these pumps may not be normally operating, operability testing is required.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	152	The CL is a dual use system which provides cooling during normal plant operations and post-accident. During normal plant operations both safeguards and non-safeguards systems are cooled. Therefore, the phrase, "required to mitigate accidents" is included to replace the phrase, "in the flow path". Some valves are required to isolate non-safeguards portions of the system. Other automatic valves may be associated with non-safeguards portions of the system which are not required to reposition following an accident.
CL	153	The CL includes both safeguards and non-safeguards pumps. Since only the safeguards pumps are required to start automatically, this SR specifically references the safeguards pumps.
CL	154	The design feature at PI which provides assurance for a heat sink is the Emergency Cooling Water Line and the safeguards traveling screens. These design features have been combined into one specification for the ITS which is entitled, "Emergency Cooling Water (CL) Supply." Therefore the title, LCO and other affected portions of this specification have been revised to the PI specific title.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	155	The Emergency Cooling Water Supply at PI is a shared design feature which supports the operation of both units. Since PI has one set of TS which applies to both units, those specification provisions which apply collectively to both units are noted accordingly. Thus an Action Statement Note and associated Bases state that the Condition and Required Actions are applicable to both units.
CL	156	New Action Statements A and B are included to incorporate CTS requirements for the safeguards traveling screens. These requirements are the same as CTS except for changes required to conform to the ISTS format (such changes were addressed in Part D, Discussion of Changes to CTS). Associated Bases have also been provided.
CL	157	The Action Statements and associated Required Actions and Completion Times have been modified to incorporate CTS requirements to assure that at least one emergency bay sluice gate is open. These requirements are the same as CTS except for changes required to conform to the ISTS format (such changes were addressed in Part D, Discussion of Changes to CTS, for this Section). Associated Bases have also been provided.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	158	A new SR for the safeguards travelling screens which implements current plant procedure requirements is included in the ITS. The ISTS requirements have been revised to implement the plant requirements.
PA	159	NUREG-1431 assumes that all safeguards Service Water (PI - Cooling Water) pumps are electric motor driven. PI has diesel driven Cooling Water pumps which require a fuel oil supply. To be consistent with the fuel oil supply requirements for the diesel generators provided in NUREG-1431 Specification 3.8.3, new Conditions D and E, new SR 3.7.8.3 and associated Bases are included.
	160	Not used.
CL	161	NUREG-1431 SRs 3.7.9.2, 3.7.9.3 and 3.7.9.4 are not included in the PI ITS since these SRs are provided with brackets and relate to an UHS with a totally different design concept than used at PI. Therefore, these SRs are not in the CTS and are not included in the ITS.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	162	The system which provides a protected environment from which operators can control the unit following an uncontrolled release of radioactivity at PI is called the Control Room Special Ventilation System (CRSVS). Thus, this specification title, LCO, affected Action Statements, SRs and associated Bases have been revised to incorporate this change.
CL	163	The CRSVS at PI is a shared system which supports the operation of both units. Since PI has one set of TS which applies to both units, an Action Statement Note is included which requires the Conditions and Required Actions to apply to both units.
CL	164	Bracketed MODES 5 and 6 are not included in the Applicability, affected Action Statements and Bases. As stated in the ISTS Bases for this specification, these MODES are applicable when the plant has external waste gas storage tanks which could rupture. Since PI does not have external waste gas storage tanks, these MODES are not applicable.

Difference Category	Difference Number 3.7-	Justification for Differences
TA	165	The applicability of CORE ALTERATIONS has been deleted in accordance with TSTF-51, Revision 2. The option of making the Specification and Bases only applicable to "recently" irradiated fuel is not included since PI has not performed analyses to support excluding the older fuel.
CL	166	The PI CRSVS does not perform a safety related function in a toxic gas protection mode; therefore, the bracketed Note relating to the toxics protection mode is not included. Bases statements relating to toxics protection are not included.
CL	167	The PI CRSVS does not have heaters; therefore the bracketed requirement to operate for 10 hours with heaters operating is not included. Likewise, Bases statements relating to system heaters are not included.
CL	168	The CTS requirements to verify fan flow in each train is retained in this SR. Since the other test provisions in NUREG-1431 are not part of the CTS requirements, they are not included.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	169	The system at PI which provides cooling capability for the control room, as well as other essential equipment rooms, is the Safeguards Chilled Water System (SCWS). This is a new specification for PI since this system is not included in the PI CTS. NUREG-1431 Specification 3.7.11 title, LCO, affected Action Statements and Bases have been revised to change to SCWS. The term "trains" has been changed to "loops" since this is more appropriate for the design of this system.
PA	170	PI CTS do not have any Surveillance Requirements for the SCWS; thus two new SRs, 3.7.11.1 and 3.7.11.2, are included in the ITS. SR 3.7.11.1 verifies that the SCWS actuates as required. Since this test is required to be performed with the SI system tests, a 24 month frequency is provided to allow testing during refueling outages. SR 3.7.11.2 verifies that SCWS components, as specified in the IST program, are OPERABLE. The IST program also specifies the testing Frequency which varies for each component.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	171	The SCWS at PI is a shared system which supports the operation of both units. Since PI has one set of TS which applies to both units, the Actions are modified by a Note which requires the Conditions and Required Actions to apply to both units. Since this system supports the CRSVS which is not required to be operable in MODES 5 and 6, the SCWS is likewise not required to be operable in MODES 5 and 6.
PA	172	The PI Auxiliary Building Special Ventilation System (ABSVS) is the system which most closely resembles the Emergency Core Cooling System Pump Room Exhaust Air Cleanup System. Therefore, the name of this specification has been revised to ABSVS in the title, LCO, affected Action Statements, SRs and throughout the associated Bases.
CL	173	The ABSVS at PI is a shared system which supports the operation of both units. Since PI has one set of TS which applies to both units, an Actions Note is included which requires the Conditions and Required Actions to apply to both units.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	174	CTS 3.6.E.1 allows the ABSV boundary to be inoperable for 24 hours to allow time for repairs. If the ventilation boundary is not restored in 24 hours both units are required to shut down. Thus the provisions of the CTS are included in the ITS. CTS also allows openings in the ABSV boundary provided they are under administrative control and can be reduced to less than 10 square feet within 6 minutes following an accident. These requirements have been retained through the LCO Note and provisions of the Bases. These changes are generally consistent with approved traveler TSTF - 287, Revision 5.
CL	175	The ABSVS includes heaters; therefore the 15 minute operating time for systems without heaters was not included. The requirement for "continuous" operation has not been included since CTS does not require continuous operation.
CL	176	CTS for the ABSVS require verification that a negative pressure is developed within 6 minutes. The CTS test requirements have been retained along with the quarterly test interval.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	177	At PI this system does not have filter bypass dampers; therefore this SR is not included.
PA	178	The title, LCO, affected Action Statements and associated Bases are revised to incorporate the plant specific title for this structure, system or component.
	179	Not used.
	180	Not used.
CL	181	The Applicability to MODES 1 through 4 are not included since the PI SFPSVS is not a mitigation system for LOCAs or other accidents in containment. The design basis of this system is only for mitigation of fuel handling accidents in the fuel pool enclosure. NUREG-1431 Condition B is not included since this is only applicable if the SFPSVS is required during MODES 1 through 4. Also the phrase, "during movement of irradiated fuel assemblies in the fuel building" is deleted since this is understood because that is the only Applicability remaining for this specification. These changes have also been incorporated in the Bases as applicable.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	182	The spent fuel storage area at PI is within the "fuel pool enclosure"; therefore this name is used in lieu of "fuel building".
TA	183	This change incorporates TSTF-36, Revision 4. Since plant shutdown does not remove the plant from a condition of Applicability, 3.0.3 is not applicable to this specification. The Bases Actions Note discussion was modified to conform to the format of other Actions Note discussions.
CL	184	The PI SFPSVS system has heaters; therefore the bracketed requirements for systems without heaters is not included. The requirement for "continuous" operation has not been included since CTS does not require continuous operation.
CL	185	The CTS provisions for testing the SFPSVS system fans have been retained. CTS do not require verification that a negative pressure can be maintained and therefore these NUREG-1431 requirements are not included.
CL	186	PI does not have a separate system for Penetration Room Exhaust Air Cleanup; therefore this specification is not included in the PI ITS.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	187	Since PI does not use the NUREG-1431 Specification 3.7.14, Penetration Room Exhaust Air Cleanup, NUREG-1431 Specification 3.7.18 has been renumbered and relocated to 3.7.14 to keep Specification 3.7.15 through 3.7.17 numbering consistent with the standard.
PA	188	The PI CTS requirement for 1800 ppm is provided.
CL	189	PI takes credit for the soluble boron in the spent fuel pool in its criticality analyses. Therefore, the specified boron concentration is required to be maintained at all times. Accordingly, the Applicability and Condition A requirements relating to movement of fuel are not included. Likewise, Bases discussion relating to movement of fuel and verification of fuel location have not been included.
CL	190	A new SR is included to incorporate current TS surveillance requirements for spent fuel pool inventory following a spent fuel handling campaign in the spent fuel pool.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	191	CTS require all stored spent fuel in all regions of Pool 1 and Pool 2 to meet enrichment, burnup and decay time limitations defined in the Figures. Therefore, "decay time" has been added to the storage criteria and reference to "Region 2" has been deleted throughout this specification and associated Bases.
F	192	The sample NUREG-1431 Figure 3.7.17-1 is not included and has been replaced by the two applicable figures from the CTS.
	193	Not used.
TA	194	This change incorporates TSTF - 255, Revision 1.
	195-200	Not used.
PA	201	Included throughout the Bases are reference corrections, renumbering and relettering of paragraphs and minor wording changes which have been made to accommodate changes to the Specifications and Prairie Island (PI) unique needs. These changes are not identified by change numbers.

Difference Category	Difference Number 3.7-	Justification for Differences
TA	202	This change is consistent with the guidance of approved TSTF - 235, Revision 1. In general, TSTF-235 has not been incorporated into the ITS since PI has not been analyzed for continued operation with less than five MSSVs per steam generator operable. Thus many of the changes introduced by TSTF - 235 are not applicable to the PI ITS and have not been incorporated.
PA	203	Clarification is provided that "simmering", limited intermittent flow past the seat without actually lifting the valve, is a normal operational characteristic of safety valves which does not make the MSSV inoperable.
PA	204	This description of accident analyses requirements has been relocated from the Bases LCO discussion to the Bases ASA section where it is more appropriately located.
	205	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	206	The Bases ASA discussion has been modified as required to appropriately describe the PI analyses of MSSV performance. For example, the discussion of the limiting AOO terminating normal feedwater flow is not accurate for PI. The discussions about crediting pressurizer relief valves, and active and passive failure modes have not been included since these are not applicable to PI.
PA	207	Clarification is provided that the steam generators will not be overpressurized in MODE 5 and 6 because they do not have sufficient energy content.
	208	Not used.
	209	Not used.
	210	Not used.
CL	211	PI MSSV do not have these features; thus this provision of the SR is not included.
PA	212	Clarification is provided on the as-left setpoint requirements for performance of this SR.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	213	The specific PI accident is identified rather than using the more general term "high energy line break (HELB)". At PI the use of HELB in this context could cause confusion, since at PI HELB has a different use than the industry use of this term.
CL	214	The PI specific signal inputs are listed.
	215	Not used.
CL	216	At PI, the MSIV bypass valves are manual valves that serve a limited function; thus this discussion has been modified to accurately describe PI.
PA	217	The MSIV manual controls directly operate the valve without any intervening logic circuitry. Therefore, "actuated" has been replaced with "operated". Bypass valves have been included since they are also operated manually.
	218-220	Not used.
CL	221	An important feature of the PI steam line design, which is credited in the accident analyses, is the non-return check valves. Therefore, discussion of these valves is included in the Bases Background and Actions.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	222	The Bases ASA discussion has been modified to be accurate and complete for the PI MSIVs. For example, the PI main steam line break assumes that offsite power continues to be available since this is a more limiting case. The reference to reverse flow and loss of inventory is not applicable since PI has non-return valves to prevent steam generator blowdown.
PA	223	The Bases LCO is modified to be consistent with the number of PI MSIVs and the terminology used at PI for isolation signals.
PA	224	PI does meet 10 CFR 100 limits and therefore "or the NRC staff approved licensing basis" is not included in the Bases LCO discussion.
	225	Not used.
PA	226	Clarification is provided that this Condition is not entered if both MSIVs are closed which would be a means of exiting the conditions of Applicability.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	227	Throughout this Bases, the discussion of the MFIVs and associated bypass valves isolating MFW flow to the steam generators following an accident has been replaced with discussion of the MFRVs and associated bypass valves.
CL	228	Requirements from CTS Table 4.1-1B Functional Unit 5a have been included since manual closing of these valves also fulfills those requirements.
PA	229	Bases 3.7.2 Required Action B.1, the clause, "and to close the MSIVs" has not been included. The MSIVs may be closed in response to this required action; however, they are not required to be closed until Required Action C.1 is entered. Therefore it is not accurate to account for time to close the MSIVs in Required Action B.1 and this clause has not been included.
	230	Not used.
CL	231	Since the MFIVs are not included in this specification, the Bases Background discussion has been revised to accurately describe the use of MFRVs at PI.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	232	The Bases ASA discussion has been modified as required to appropriately describe the PI analyses of MFRV and associated MFRV bypass valves. Since the MFRVs are not safety related components, other plant design features that may isolate feedwater flow following an accident are also discussed.
PA	233	The statement, "These valves will also isolate the nonsafety related portion from the safety related portions of the system", is not included because that function is provided by the MFIVs which are addressed in Section 3.6, Containment Systems.
PA	234	Guidance is provided to the operators on how to determine that the MFRVs are operable when the valves may be leaking. Leakage through these valves is anticipated, based on their past performance; thus the analyses have conservatively bounded the valve leakage.
	235	Not used.
PA	236	The statement, "This ensures that, in the event of an HELB, a single failure cannot result in the blowdown of more than one steam generator", is not appropriate in the Applicability and therefore is not included.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	237	The Bases Actions discussions have been modified to be consistent with the changes made to the Specification Required Actions.
	238	Not used.
	239	Not used.
	240	Not used.
PA	241	The statement, "These valves should not be tested at power since even a part stroke exercise increases the risk of a valve closure with the unit generating power." is not included since it is not true for the MFRVs and MFRV bypass valves at PI.
CL	242	Since PI uses SG PORVs rather than the Atmospheric Dump Valves for this cooling function, the Bases Background discussion has been modified to accurately describe the design and use of the SG PORVs at PI.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	243	The Bases Applicable Safety Analyses discussion has been modified to describe how SR PORVs factor into the plant safety analysis. Plant specific aspects of the safety analysis are identified. Automatic operation of the SG PORVs is not credited in the safety analyses. Rather, the SG PORVs may provide mitigation for accidents involving use of main steam safety valves. In the steam generator tube rupture accident analysis presented in USAR Section 14, the SG PORVs are implicitly assumed to be used by the operator to cool down the unit to RHR entry conditions for accidents accompanied by a loss of offsite power.
CL	244	The Bases LCO discussion has been modified to be consistent with the PI design and use of the SG PORVs.
	245	Not used.
CL	246	The PI AFW system has design features which differ from other plants. The Bases Background discussion of the AFW system has been modified to correctly describe the PI system.
PA	247	PI specific terminology for the steam generator power operated relief valves (SG PORVs) and steam dump valves is used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	248	The PI AFW system has safety-related and non-safety related actuation signals, and it has different signals for the motor driven pump and the turbine driven pump. Thus the discussion of actuation signals has been rewritten for clarity.
	249	Not used.
	250	Not used.
CL	251	The Bases Applicable Safety Analyses discussion has been modified to describe how the PI AFW system factors into the plant safety analyses. The PI specific DBA are listed. ESFAS loop logic is not applicable to PI and is not included.
	252	Not used.
PA	253	The clause "function when the MFW is lost" has been replaced with "provide heat removal". This wording will avoid possible confusion for the operators since the AFW system is required to be operable regardless of the status of the MFW system.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	254	The PI CST system differs from other plants in that PI has three interconnected tanks which supply both units. The Bases Background has been modified to reflect the PI unique design of this system.
PA	255	CTS requirements have been relocated to this Bases to retain these requirements in the ITS.
CL	256	The Bases Applicable Safety Analyses discussion has been modified to describe how the PI CSTs factor into the plant safety analyses including the design basis events and the CST volume basis. The limiting event discussed in NUREG-1431 is not applicable to PI.
CL	257	The PI specific requirements for CST operability are defined and the discussion which does not apply to PI has not been included.
CL	258	This paragraph has been modified to be accurate for the testing which is performed quarterly. PI performs only the differential pressure test on a quarterly basis since there is an ASME Section XI deferral for the quarterly flow test. In accordance with the PI IST program, a flow test is performed each refueling outage.

Difference Category	Difference Number 3.7-	Justification for Differences
	259	Not used.
	260	Not used.
PA	261	Plant specific references to the safety-related Cooling Water system which is the backup system for the CSTs are included.
TA	262	This change incorporates TSTF - 174.
CL	263	The PI Component Cooling System has unique design features such as the ability to cross-connect between the two units and a shared surge tank. These features are included in the Bases discussion and NUREG-1431 discussion that is not appropriate has not been included.
CL	264	Discussion of the CC pump automatic start on system low pressure is included for completeness.
	265	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	266	NUREG-1431 discussion of the CC system safety functions and assumptions has been replaced with discussion appropriate for PI.
CL	267	Since PI has a shared surge tank, the clause "and associated surge tank" is not appropriate and has not been included.
PA	271	Clarification is provided to indicate that RHR heat exchanger cooling is not the only function for which the CC system must be operable. This change has been made to be accurate and avoid operator confusion.
PA	272	Clarification is provided that this SR may be satisfied by a control room check of valve positions.
PA	273	At PI, this SR is unlikely to cause a plant transient and therefore may be performed at power. However, as noted in the added Bases discussion, the 24 month Frequency is necessary since there may be some times that performing the test at power could jeopardize plant operations.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	274	The PI Cooling Water (CL) System is the equivalent of the NUREG-1431 Service Water System. The Bases Background has been modified to give a more detailed description of the CL system as it is designed at PI.
	275	Not used.
CL	276	The Bases Applicable Safety Analyses section has been modified to describe the design basis for the CL system at PI, namely a LOCA with loss of offsite power.
CL	277	The Bases LCO discussion has been modified to incorporate the current TS requirements for operability of this system. The discussion is much more extensive than NUREG-1431 because PI has a system which supports two units and involves diesel driven safeguards pumps and a "swing" motor driven safeguards pump.
	278	Not used.
	279	Not used.
	280	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	281	Clarification is provided that this Specification applies to both units. A failure to meet operability requirements could result in shutdown of both units.
CL	282	CTS detailed requirements have been relocated to the SR Bases.
CL	283	Discussion of safeguards pump automatic start on system low pressure is included for completeness.
CL	284	Bases Background discussion is provided for the Emergency Cooling Water Supply (ECWS). The ECWS comprises two plant design features, the Emergency Cooling Water Line and the safeguards traveling screens.
	285	Not used.
CL	286	The Bases UHS Applicable Safety Analyses discussion has been replaced with discussion of the design basis for the Emergency Cooling Water Supply. This sub-system supplies water to the Cooling Water System following a Design Basis Earthquake or event which prevents use of the normal cooling water supply.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	287	The Bases LCO section provides the basis for operability of the PI Emergency Cooling Water Line and safeguards traveling screens.
	288	Not used.
	289	Not used.
	290	Not used.
CL	291	The Bases Background has been modified to describe the CRSVS as designed and operated at PI. The PI system does not include demisters, does not function in a safety related toxics mode and does not have filter heaters. These changes and others have been made to make the Bases correct for PI.
CL	292	The PI specific actuation signals for the CRSVS have been listed for completeness.
CL	293	The Bases Applicable Safety Analyses have been revised to describe the design basis for the PI CRSVS which is: loss of coolant accident, fuel handling accident, and main steam line break.
CL	294	The PI specific OPERABILITY requirements for the CRSVS have been provided.

Difference Category	Difference Number 3.7-	Justification for Differences
	295	Not used.
PA	296	Clarification is provided that the instrumentation which starts the cleanup fan is required to be operable or the system may be aligned to perform its safety function and operating. This would permit the radiation monitor to be inoperable without requiring entry into a Condition.
PA	297	As a practical matter, the personnel doors must be opened in order to allow personnel access. Technically, these momentary door openings cause a breach of the ventilation system boundary. Since these openings are very short and personnel are present to assure the door is shut if an accident were to occur, clarification is provided that opening doors for normal personnel access does not make the ventilation system inoperable. These changes are consistent with the intent of TSTF - 287, Revision 5.
CL	298	The PI CRSVS does not have heaters or demisters; therefore, these items are not included in the list of equipment required for system operability.
	299	Not used.
	300	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	301	For completeness, "or fuel handling" is included in addition to the DBA.
PA	302	The reason for operating the OPERABLE train of ventilation is replaced with a statement that is more accurate for PI.
PA	303	This SR will be performed in accordance with the requirements of the VFTP. The VFTP will define the codes, standards and regulatory guidance upon which it is based. References to specific documents have not been included to assure consistency by having the source documents listed in only one place.
CL	304	Reference to NUREG-0800 is not included since PI is not committed to this document. This equipment is very reliable and usually passes this test when it is performed and on this basis 24 month STAGGERED TEST BASIS Frequency is justified.
	305	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	306	PI does not have a separate Control Room Emergency Air Temperature Control System (CREATCS)(NUREG-1431 LCO 3.7.11). The closest analogy is the Safeguards Chilled Water System (SCWS) that is used for cooling the control room. This system also provides cooling for safeguards bus rooms, RHR pits, computer and relay rooms and the event monitoring equipment room. Extensive markup of the NUREG-1431 LCO 3.7.11 associated Bases Background, Bases Applicable Safety Analyses and Bases LCO discussions is required to make it applicable to the PI SCWS. In this Bases, more attention is devoted to the control room, bus rooms and RHR pit cooling since these functions have more safety and risk significance.
CL	307	The PI design basis for the SCWS is provided. The 30 days stated in NUREG-1431 is not included since it is not a design requirement for the cooling related aspect of the system at PI.
	308	Not used.
	309	Not used.
	310	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	311	PI specific requirements for SCWS operability are provided. This system at PI is unique compared to other TS required systems, in that remedial action may be taken under some conditions which completely satisfy the system functional requirements.
CL	312	PI does not have an ECCS PREACS system for which Specification 3.7.12 is provided in NUREG-1431. The CTS required ABSVS is the analogous system. CTS also addresses Auxiliary Building Special Ventilation Zone (ABSVZ) which is included in the ITS by combining it with the ABSVS. The background describes the passive and active features of the system.
CL	313	Discussion to demisters, backup HEPA filters, ECCS pump room and related environmental temperature and humidity controls is not included since the PI ABSVS does not have these features.
CL	314	The PI specific actuation signals and actions expected to occur upon actuation are provided.
	315	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	316	The PI accident analyses do not address ABSVS failures and thus this discussion is not included.
CL	317	The PI design basis for this ventilation system does not assume loss of offsite power coincident with a single failure, thus, "coincident with loss of offsite power" is not included.
	318	Not used.
	319	Not used.
	320	Not used.
CL	321	The PI specific basis for ABSVS operability requirements is provided.
CL	322	CTS detailed requirements have been relocated to the Bases.
PA	323	ABSVS operability is not necessarily only associated with ECCS operability; therefore, discussion of the ECCS is not included in the Bases Applicability and Action A.1 discussion.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	324	For clarity and consistency with other SR Bases, an introductory paragraph is provided which states the purpose of the SR.
	325	Not used.
PA	326	The ABSV system actuation from an SI signal has been very reliable at PI which is provided as the basis for 24 month SR Frequency.
PA	327	This discussion has been replaced with the appropriate basis for PI ITS 3.7.12.3.
	328	Not used.
	329	Not used.
	330	Not used.
PA	331	Clarification is provided for the structure and system to which this Specification applies.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	332	The Bases Background discussion has been modified to describe the SFPSVS as designed and operated at PI. The PI system does not have demisters and backup HEPA filters. These changes and others have been made to make the Bases appropriate for PI.
PA	333	Reference to LCO 3.9.4 is included for clarity and completeness.
CL	334	The Bases LCO discussion is modified to specifically address PI requirements, use PI terminology and to state, in a positive sense, the purpose of SFPSVS.
	335	Not used.
PA	336	Clarification is provided for the operators on which actions are taken since "this action" may refer to either B.1 or B.2.
PA	337	Reference to NUREG-800 is not included since PI is not committed to this document, This equipment is very reliable and usually passes this test when it is performed and therefore the 24 month Frequency is justified.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	338	The plant specific actuation signal (radiation monitor) is provided for clarity and completeness.
	339	Not used.
	340	Not used.
TA	341	This change incorporates TSTF - 173, Revision 0.
PA	342	For consistency with CTS, a general discussion of the secondary specific activity relationship to site and EAB doses is provided. NUREG-1431 discussion with specific dose values is not included.
TA	343	This change incorporates TSTF - 139, Revision 1.
CL	344	The Bases Background discussion has been modified to accurately describe the PI spent fuel storage pool and boron concentration requirements. PI does not use the MDR terminology and the pool-related configuration statements are not relevant to PI and are not included.
	335-345	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	346	PI has two different designs of stored spent fuel which require two separate figures in Specification 3.7.17. Thus, this discussion is modified to identify the two types of spent fuel and reference the PI specific figures.
CL	347	The Bases ASA discussion has been replaced with discussion derived from the CTS Bases. This discussion differs from NUREG-1431 since PI has been licensed to credit the soluble boron in the spent fuel pool.
	348	Not used.
	349	Not used.
	350	Not used.
CL	351	The CTS also requires a minimum boron concentration when loading and unloading spent fuel storage casks. For completeness, these activities are included in the Bases LCO discussion.
PA	352	The Bases References have been changed to be consistent with the CTS references since most of the discussion in this Bases was derived from the CTS Bases.

PACKAGE 3.7

PLANT SYSTEMS

PART G

NO SIGNIFICANT HAZARDS DETERMINATION
(NSHD)

and

ENVIRONMENTAL ASSESSMENT

for

CHANGES TO PRAIRIE ISLAND
CURRENT TECHNICAL SPECIFICATIONS

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
UNITS 1 AND 2

Improved Technical Specifications
Conversion Submittal

PART G
PACKAGE 3.7
PLANT SYSTEMS

**NO SIGNIFICANT HAZARDS DETERMINATION
AND ENVIRONMENTAL ASSESSMENT**

NO SIGNIFICANT HAZARDS DETERMINATION

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10CFR Part 50, Section 50.91 using the standards provided in Section 50.92.

For ease of review, the changes are evaluated in groupings according to the type of change involved. A single generic evaluation may suffice for some of the changes while others may require specific evaluation in which case the appropriate reference change numbers are provided.

A - Administrative (GENERIC NSHD)

(A3.7-01, A3.7-02, A3.7-04, A3.7-05, A3.7-06, A3.7-09, A3.7-20, A3.7-21, A3.7-31, A3.7-34, A3.7-36, A3.7-44, A3.7-57, A3.7-62, A3.7-66, A3.7-74, A3.7-77, A3.7-78, A3.7-83, A3.7-94, A3.7-97, A3.7-105)

Most administrative changes have not been marked-up in the Current Technical Specifications, and may not be specifically referenced to a discussion of change. This No Significant Hazards Determination (NSHD) may be referenced in a discussion of change by the prefix "A" if the change is not obviously an administrative change and requires an explanation.

These proposed changes are editorial in nature. They involve reformatting, renaming, renumbering, or rewording of existing Technical Specifications to provide consistency with NUREG-1431 or conformance with the Writer's Guide, or change of current plant terminology to conform to NUREG-1431. Some administrative changes involve relocation of requirements within the Technical Specifications without affecting their technical content. Clarifications within the new Prairie Island Improved Technical Specifications which do not impose new requirements on plant operation are also considered administrative.

A - Administrative (GENERIC NSHD) (continued)

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed conversion of Prairie Island Current Technical Specifications to conform to NUREG-1431 involves reformatting, rewording, changes in terminology and relocating requirements. These changes are simply editorial, or do not involve technical changes and thus they do not impact any initiators of previously analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

These proposed administrative changes do not involve physical modification of the plant, no new or different type of equipment will be installed or removed associated with these administrative changes, nor will there be changes in parameters governing normal plant operation. The proposed administrative changes do not impose new or different requirements on plant operation. Therefore, these administrative changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

These proposed administrative changes do not impact any safety analysis assumptions. Therefore, these changes do not involve a reduction in the plant margin of safety.

M - More restrictive (GENERIC NSHD)

(M3.7-08, M3.7-12, M3.7-13, M3.7-14, M3.7-15, M3.7-16, M3.7-23, M3.7-26, M3.7-27, M3.7-30, M3.7-35, M3.7-37, M3.7-39, M3.7-40, M3.7-42, M3.7-46, M3.7-48, M3.7-49, M3.7-51, M3.7-52, M3.7-53, M3.7-55, M3.7-58, M3.7-59, M3.7-60, M3.7-61, M3.7-65, M3.7-73, M3.7-75, M3.7-76, M3.7-104, M3.7-107, M3.7-108)

This proposed Technical Specifications revision involves modifying the Current Technical Specifications to impose more stringent requirements upon plant operations to achieve consistency with the guidance of NUREG-1431, correct discrepancies or remove ambiguities from the specifications. These more restrictive Technical Specifications have been evaluated against the plant design, safety analyses, and other Technical Specifications requirements to ensure the plant will continue to operate safely with these more stringent specifications.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes provide more stringent requirements for operation of the plant. These more stringent requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event.

These more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed changes do not involve a physical alteration of the plant, that is, no new or different type of equipment will be installed, nor do they change the methods governing normal plant operation.

These more stringent requirements do impose different operating restrictions. However, these operating restrictions are consistent with the boundaries established by the assumptions made in the plant safety analyses and licensing bases. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

M - More restrictive (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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The imposition of more stringent requirements on plant operation either has no impact on the plant margin of safety or increases the margin of safety. Each change in this category is by definition providing additional restrictions to enhance plant safety by:

- a) increasing the analytical or safety limit;
- b) increasing the scope of the specifications to include additional plant equipment;
- c) adding requirements to current specifications;
- d) increasing the applicability of the specification;
- e) providing additional actions;
- f) decreasing restoration times;
- g) imposing new surveillances; or
- h) decreasing surveillance intervals.

These changes maintain requirements within the plant safety analyses and licensing bases. Therefore, these changes do not involve a significant reduction in a margin of safety.

R - Relocation (GENERIC NSHD)
(R3.7-32, R3.7-69, R3.7-79, R3.7-106)

This License Amendment Request (LAR) proposes to relocate requirements contained in the Current Technical Specifications out of the Technical Specifications into licensee controlled programs. These requirements are relocated because they 1) do not meet the Technical Specifications selection criteria defined in 10 CFR 50.36; or 2) are mandated by current Nuclear Regulatory Commission (NRC) regulations and are therefore unnecessary in the Technical Specifications.

In the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (dated 7/16/93), the NRC stated:

... since 1969, there has been a trend towards including in Technical Specifications not only those requirements derived from the analyses and evaluations included in the safety analysis report but also essentially all other Commission requirements governing the operation of nuclear power reactors. . . . This has contributed to the volume of Technical Specifications and to the several-fold increase, since 1969, in the number of license amendment applications to effect changes to the Technical Specifications. It has diverted both staff and licensee attention from the more important requirements in these documents to the extent that it has resulted in an adverse but unquantifiable impact on safety.

Thus, relocation of unnecessary requirements from the Current Technical Specifications should result in an overall improvement in plant safety through more focused attention to the requirements that are most important to plant safety.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

These proposed changes relocate requirements for structures, systems, components or variables which did not meet the criteria for inclusion in the improved Technical Specifications, or which duplicate regulatory requirements. The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events.

Relocation (continued)

These relocated operability requirements will continue to be maintained pursuant to 10 CFR 50.59, other regulatory requirements (as applicable for the document to which the requirement is relocated), or the Administrative Controls section of these proposed improved Technical Specifications.

Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

These proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed changes do not impose any different requirements and adequate control of existing requirements will be maintained. Thus, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

These proposed changes will not reduce the margin of safety because they do not impact any safety analysis assumptions. In addition, the relocated requirements for the affected structure, system, component or variables are the same as the current Technical Specifications. Since future changes to these requirements will be evaluated per the requirements of 10 CFR 50.59, other regulatory requirements (as applicable for the document to which the requirement is relocated), or the Administrative Controls section of the Improved Technical Specifications, proper controls are in place to maintain the plant margin of safety. Therefore, these changes do not involve a significant reduction in the margin of safety.

LR - Less restrictive, Relocated details (GENERIC NSHD)

(LR3.7-17, LR3.7-18, LR3.7-19, LR3.7-24, LR3.7-28, LR3.7-29, LR3.7-38, LR3.7-41, LR3.7-43, LR3.7-45, LR3.7-47, LR3.7-63, LR3.7-64, LR3.7-67, LR3.7-68, LR3.7-81, LR3.7-82, LR3.7-84, LR3.7-86, LR3.7-87, LR3.7-98, LR3.7-99, LR3.7-100, LR3.7-102, LR3.7-112)

Some information in the Prairie Island Current Technical Specifications that is descriptive in nature regarding the equipment, system(s), actions or surveillances identified by the specification has been removed from the proposed specification and relocated to the proposed Bases, Updated Safety Analysis Report or licensee controlled procedures. The relocation of this descriptive information to the Bases of the Improved Technical Specifications, Updated Safety Analysis Report or licensee controlled procedures is acceptable because these documents will be controlled by the Improved Technical Specifications required programs, procedures or 10CFR50.59. Therefore, the descriptive information that has been moved continues to be maintained in an appropriately controlled manner.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes relocate detailed, descriptive requirements from the Technical Specifications to the Bases, Updated Safety Analysis Report or licensee controlled procedures. These documents containing the relocated requirements will be maintained under the provisions of 10CFR50.59, a program or procedure based on 10CFR50.59 evaluation of changes, or NRC approved methodologies. Since these documents to which the Technical Specifications requirements have been relocated are evaluated under 10CFR50.59 or its guidance, or in accordance with NRC approved methodologies, no increase in the probability or consequences of an accident previously evaluated will be allowed without prior NRC approval. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

LR - Less restrictive, Relocated details (continued)

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

These proposed changes do not necessitate physical alteration of the plant, that is, no new or different type of equipment will be installed, or change parameters governing normal plant operation. The proposed changes will not impose any different requirements and adequate control of the information will be maintained. Thus, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes will not reduce a margin of safety because it has no impact on any safety analysis assumptions. In addition, the requirements to be transposed from the Technical Specifications to the Bases, Updated Safety Analysis Report or licensee controlled procedures are the same as the existing Technical Specifications. Since future changes to these requirements will be evaluated under 10CFR50.59 or its guidance, or in accordance with NRC approved methodologies, no reduction in a margin of safety will be allowed without prior NRC approval. Therefore, these changes do not involve a significant reduction in a margin of safety.

L - Less restrictive, Specific

Each CTS change which is designated as Less (L prefix) restrictive on plant operations is provided with a specific NSHD.

Specific NSHD for Change L3.7-03

CTS do not provide an action statement addressing inoperability of one or more MSSVs; therefore the unit would be required to enter CTS 3.0.C if a MSSV were inoperable. CTS 3.0.C allows 1 hour to implement corrective action whereas this change proposes to allow four hours to implement corrective action. This change is acceptable because the probability is very low that a pressure transient will occur during this additional three hours; the SG PORVs will initially address a main steam pressure transient so the probability the MSSVs will be required to operate during this additional three hours is even lower. Furthermore, there are four other MSSVs which service the SG being affected, which further reduces the likelihood that any particular MSSV will be required at any time. This change is consistent with the approved GITS.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves extending the time allowed for one MSSV to be inoperable while corrective actions are implemented. Since MSSVs are not assumed accident initiators, this change does not affect the probability of an accident. There are other system design features which provide for pressure transient protection and the probability of an event which requires any particular MSSV to operate is very low. Therefore this change does not involve a significant increase in the consequences of an accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change makes the PI ITS consistent with the guidance of WCAP-11618 and does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-03 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed change in effect extends the time for a MSSV to be inoperable while corrective actions are implemented from one hour to four hours. The probability of a plant transient during the three additional hours, which would require the inoperable MSSV to operate, is very low. The additional three hours allows the plant to attempt to make repairs and prepare for a well planned shutdown. The process of shutting down the plant is more likely to cause a transient requiring the MSSVs than continued plant operation. Furthermore, there are other plant design features, such as the SG PORVs and Steam Dumps, to mitigate steam line pressure transients. Thus, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with approved GITS and the guidance of WCAP-11618.

Specific NSHD for Change L3.7-07

CTS allow one SG PORV to be inoperable for 48 hours. Since there are other means available to provide a heat sink for the SGs, it is acceptable to extend this outage time to 7 days. This change would also allow both SG PORVs to be inoperable for 24 hours. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves extending the time allowed for one SG PORV to be inoperable and defines allowable outage time for both SG PORVs inoperable. Since this system is not an accident initiator, these changes do not affect the probability of an accident. There are other systems which provide a comparable SG heat sink such as the Steam Dumps to the condenser, Steam Dumps to the atmosphere and the Main Steam Safety Valves. Thus the unavailability of one SG PORV for up to 7 days or both SG PORVs up to 48 hours does not involve a significant increase in the consequences of an accident. Also the probability of an event requiring use of a SG PORV during these allowed outage times is low.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change makes the PI ITS consistent with the guidance of NUREG-1431 and does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-07 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed change makes the PI ITS consistent with the guidance of NUREG-1431 and does not involve a significant reduction in margin of safety. The effect of this change is to allow the SG PORVs to be inoperable for more time than currently allowed. This does not involve a significant reduction in the margin of safety because there are other systems which can provide the required heat sink for the SGs. Also the probability of an event which requires use of the SG PORVs during these allowed outage times is low; therefore the proposed change is acceptable and any reduction in the margin of safety is insignificant.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-11

CTS specify that during startup operations, valve positions may be adjusted to support these plant evolutions. This change will introduce a note which will consider an AFW train operable when it is used for SG level control under administrative control. This change is consistent with the guidance provided in NRC letter from Beth Wetzel to Roger Anderson, dated October 17, 1997. Therefore, this change is consistent with PI current operating practices.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves considering an AFW train operable when it is operating to control SG level under administrative control. Since the AFW system is not an accident initiator this change does not increase the probability of an accident. Under the provisions of the new note, the AFW train is already operating, and it clearly is able to provide water to the steam generator. Since the system is under operator control, if an accident were to occur, the operator would be able to immediately align the system for accident mitigation. Furthermore, accident response procedures require the operators to verify the operating conditions of the AFW system in a timely manner. Thus, this change does not significantly increase the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-11 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed change makes the PI ITS consistent with current operating practices at PI and does not involve a significant reduction in margin of safety. Whenever an AFW train is controlling SG level, it is demonstrating it is capable of supplying water to the SG. It may not be providing the maximum flow to the SGs, but operator action will assure that full flow will be provided as required. The AFW system is normally used to control SG level during reduced power operations such as MODE 2 and 3 during plant startup and shutdown operations. Under these conditions, there is less energy in the reactor and an accident would allow more time for operator response. Thus, considering an AFW train operable when it is controlling SG level does not involve a significant reduction in the plant margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

Specific NSHD for Change L3.7-22

The proposed change would allow one steam supply to the turbine driven AFW pump to be inoperable for 7 days. This change is acceptable since the other steam supply remains operable and therefore the turbine driven AFW pump remains operable. Also the motor driven AFW pump is operable. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not result in any hardware or operating procedure changes. The turbine driven AFW pump is not assumed to be an initiator of any analyzed event; therefore, the addition of 7 day Completion Time for restoring an inoperable steam line supply does not affect the probability of an accident. The proposed change does not allow continuous operation such that a single failure could result in failure of the AFW system to perform its safety function. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change makes the PI ITS consistent with the guidance of NUREG-1431 and does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will only provide a 7 day Completion time to restore the steam supply line to the turbine driven AFW pump. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-22 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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The proposed change makes the PI ITS consistent with the guidance of NUREG-1431 and allows 7 days to restore the steam supply to the turbine driven AFW pump prior to requiring a unit shutdown. This change is acceptable based on the small probability of an event requiring the turbine driven AFW pump to function during this time period, and the fact that the other 100% capacity steam supply line is still operable. Providing the 7 day Completion Time will minimize the potential for plant transients that can occur during a TS required shutdown by providing adequate time to restore an inoperable steam supply line to operable status instead of the shorter AFW pump Completion Time being applied. Therefore, any reduction in margin of safety resulting from the 7 day Completion Time will be offset by the benefit gained from avoiding an unnecessary plant transient. Thus, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-25

The proposed change increases the Completion Time to 7 days to restore inoperable CSTs to operable status. This change is acceptable based on the availability of the backup cooling water supply and new requirements to periodically verify availability of the backup water supply. Also, CST inoperability, in many instances such as low CST level, does not result in total loss of function. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change increases the Completion Time to 7 days to restore inoperable CSTs to operable status. The CSTs are not considered as an initiator for any accidents previously analyzed. Therefore, this change does not increase the probability of a previously analyzed accident. The cooling water system provides a safety related backup source of water and the proposed change requires frequent verification of the availability of the backup supply. Therefore, allowing additional time to restore CSTs to operable status does not involve a significant increase in the consequences of an accident previously analyzed.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant, that is, no new or different type of equipment will be installed. This proposed change does not introduce any new mode of plant operation or change the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-25 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The CSTs are backed up with the safety-related cooling water system which is capable of providing 100% of the make up water required by the SGs and this TS change requires frequent verification of cooling water system availability.

Furthermore, in many instances, such as low CST level, inoperability of the CSTs may not involve complete loss of function. Therefore the proposed change does not result in a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-33

This change removes the requirement for steam line isolation valve manual switches to be operable when both MSIVs are closed. When both MSIVs are closed the safety function of these switches have been fulfilled and there is no further need for them. Thus the plant is maintained in a safe configuration with this change. This change is consistent with NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change removes the requirement for steam line isolation valve manual switches to be operable when both MSIVs are closed. The steam line isolation valve manual switches are not accident initiators; therefore this change does not involve a significant increase in the probability of an accident. When the MSIVs are both closed, the isolation function of the steam line isolation valve manual switches has been performed; therefore accident consequences are not increased if this instrumentation is not operable. Thus this change does not involve a significant increase in the consequences of an accident previously analyzed.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant, that is, no new or different type of equipment will be installed. This proposed change does not introduce any new mode of plant operation or change the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-33 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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This change removes the requirement for steam line isolation valves manual switches to be operable when both MSIVs are closed. When both MSIVs are closed, the safety function of these switches has been performed and there is no further need for them to be operable. Thus this change does not involve a significant reduction in the margin of safety even if the steam line isolation instrumentation is not operable. Therefore, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-50

CTS does not provide any specific Completion Time in the event the diesel driven CLP fuel oil quantity falls below the quantities in the CTS. In this condition, both diesel CLPs would be considered inoperable. With both diesel driven CLPs inoperable, the plant will enter LCO 3.0.3 while motor driven CL pump 121 is aligned for operation. The ITS allows 48 hours to restore the fuel oil quantity to within the quantity limits. This is considered to be a less restrictive change since the ITS allows 48 hours to replenish the fuel oil to within limits prior to declaring the diesel driven CLPs inoperable. This change is consistent with the guidance of NUREG-1431 as applied to the DGs in LCO 3.8.3.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The diesel driven CLPs are not considered as initiators of any analyzed event; therefore, this change has no impact on the probability of an event previously analyzed. As such, the probability of occurrence for a previously analyzed accident is not significantly increased.

This change extends the time limit to replenish the diesel driven CLP fuel oil to within limits prior to declaring the diesel driven CLPs inoperable. The 48 hours allows sufficient time for replacement volume and performing the analyses required prior to the addition of fuel oil to the tank(s). The 48 hours is also sufficient time to replenish the fuel oil volume prior to declaring the diesel driven CLPs inoperable. The consequences of a previously analyzed event are dependent on the initial conditions assumed for the analysis, the availability and successful functioning of the equipment assumed to operate in response to the analyzed event, and the setpoints at which these actions are initiated. The successful functioning of the diesel driven CLPs is not impacted because the required volume of fuel oil to ensure the plant can mitigate any analyzed event is not jeopardized and would be available in the event of an accident while waiting (48 hours) for the arrival of replenishment fuel oil. Operating experience has demonstrated that the 48 hours is sufficient time to receive the replenishment fuel oil on site. Based on this evaluation, there is not a significant increase in the consequences of a previously analyzed event.

Specific NSHD for Change L3.7-50 (continued)

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant. No new equipment is being introduced nor is any installed equipment being operated in a new or different manner. There is no change being made to the parameters within which the plant is operated. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No alteration in the procedures which ensure the plant remains within analyzed limits is being proposed, and no change is being made to the procedures relied upon to respond to an off normal event. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This change increases the Completion Time to replenish the diesel driven CLP fuel oil volume prior to declaring the diesel driven CLPs inoperable. However, this increased Completion Time is consistent with Regulatory Guide 1.93 for diesel generators. The 48 hour extension is sufficient for PI to receive and test the required fuel oil. This 48 hour extension is acceptable based on the remaining capacity which is adequate to supply the diesel driven CLPs with enough fuel oil to perform their intended safety function to mitigate those events analyzed in the USAR. There is no detrimental impact on any equipment design parameter, and the plant will still be required to operate within its prescribed limits as identified and analyzed in the USAR. Therefore, the change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431 as applied to the DGs in LCO 3.8.3.

Specific NSHD for Change L3.7-54

CTS requires both trains of CRSVS to be operable at all times. The proposed change would not require CRSVS to be operable during MODES 5 and 6 or during CORE ALTERATIONS. CRSVS OPERABILITY during fuel handling operations will continue to be required. This change is acceptable since radiological releases are not postulated in these MODES and condition. This change is consistent with the guidance of TSTF-51.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change revises the Applicability statement for the CRSVS to exclude MODES 5 and 6 and CORE ALTERATIONS. The CRSVS is not an accident initiator; therefore this change does not increase the probability of an accident. Radiological releases are not postulated during the MODES and condition excluded by this change; therefore CRSVS inoperability during these MODES and condition does not significantly increase the consequences of a previously analyzed accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-54 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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The change in the CRSVS Applicability statement does not involve a significant reduction in a margin of safety because there are no postulated radiological releases when a unit is in MODE 5 or 6 or during CORE ALTERATIONS.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This change is consistent with the guidance of NUREG-1431 as modified by approved TSTF-51.

Specific NSHD for Change L3.7-56

The proposed change would specifically remove CORE ALTERATIONS as a required condition for CRSVS operability. CRSVS OPERABILITY will continue to be required during fuel handling operations. The accidents postulated to occur during core alterations, in addition to fuel handling accidents, are: inadvertent criticality (due to a control rod removal error or continuous control rod withdrawal error during refueling or boron dilution) and the inadvertent loading of, and subsequent operation with, a fuel assembly in an improper location. These events are not postulated to result in fuel cladding integrity damage. Since the only accident postulated to occur during CORE ALTERATIONS that results in a significant radioactive release is the fuel handling accident, this proposed change is acceptable. This change is consistent with the guidance of TSTF-51.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change removes CORE ALTERATIONS from the Applicability statement for the CRSVS. The CRSVS is not an accident initiator; therefore this change does not increase the probability of an accident. Radiological releases are not postulated during the CORE ALTERATIONS; therefore CRSVS inoperability during this condition does not significantly increase the consequences of a previously analyzed accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-56 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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The change in the CRSVS Applicability statement does not involve a significant reduction in a margin of safety because there are no postulated radiological releases during CORE ALTERATIONS.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431 as modified by approved TSTF-51.

Specific NSHD for Change L3.7-72

The proposed change would allow movement of fuel assemblies for 7 days without demonstrating operability of the redundant SFPSVS train when one train is inoperable. This change is acceptable because there is a low probability of a fuel handling accident in the 7 days that fuel movements are allowed to continue and the redundant train is required to be tested to demonstrate operability every 31 days. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change allows movement of fuel for 7 days without demonstrating operability of the redundant SFPSVS train when a single train is inoperable. The SFPSVS is not an accident initiator; therefore this change does not increase the probability of an accident. There is a low probability of a fuel handling accident during the 7 days that fuel movements are allowed to continue and the redundant train is considered OPERABLE since it is required to be tested to demonstrate operability every 31 days. Therefore, revising the TS to allow movement of fuel for 7 days without further demonstrating operability of the redundant SFPSVS train does not significantly increase the consequences of a previously analyzed accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-72 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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The change to allow fuel movements to continue when one train of SFPSVS is inoperable without testing the operable SFPSVS single train does not involve a significant reduction in the margin of safety. The SFPSVS trains are tested every 31 days and failure of one train does not mean the other train is more likely to fail. System failure could occur immediately after testing just as easily as three weeks after testing. Also the probability of an event which requires use of the SFPSVS is low during the 7 days fuel handling is allowed to continue.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-85

This proposed change would remove the requirement to demonstrate AFW full flow to each SG each refueling outage. This change is acceptable because a new SR is required which in combination with the other system SRs verifies that the AFW system has the capability and proper configuration to achieve full flow to the SGs. An existing SR requires verification of pump operability and the new SR requires verification that the valves are aligned properly to achieve full flow to the SGs. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change removes the requirement to demonstrate AFW full flow to each SG each refueling outage. The AFW System is not an accident initiator; therefore this change does not increase the probability of an accident. This change will not involve a significant increase in the consequences of an accident previously evaluated since there are other verifications that the AFW system is operable and the valves are in their proper position to deliver the required flow to the SGs.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-85 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This change to remove the requirement to verify full flow to each SG each refueling outage does not involve a significant reduction in a margin of safety. This requirement has been replaced in part by a new SR which requires verification of AFW System valve positions. This new SR in combination with the current requirement to test the AFW pump capacity provide nearly equivalent verification that the system will provide flow to each SG as required. Thus this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-88

The proposed change would remove the CTS requirement to verify the position of AFW System valves which are locked in position. The purpose of locking these valves is to assure that the position does not change. The valves are verified to be in the correct position prior to being locked and the locks are under administrative control; therefore, periodic verification of valve position serves no purpose. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change removes the requirement to verify AFW valves are locked in their proper position. The AFW System is not an accident initiator; therefore this change does not increase the probability of an accident. These valves are locked in their proper position and the locks are maintained under administrative controls. Therefore there is a very high likelihood these valves will be in their proper position and this change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-88 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.
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This change does not involve a significant reduction in the margin of safety since locking the valves in the proper position and maintaining the locks under administrative control provides a high level of assurance that the valves will remain properly aligned.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-89

The proposed change would remove the CTS SR requirement to verify the normal AFW flow path to each SG following each cold shutdown. This change is acceptable since normal plant startup after each cold shutdown requires use of the AFW system to maintain SG level; thus the objective of the current SR are met without this specific requirement. The CTS requirement allows normal startup use of the AFW system maintaining SG to fulfill this test requirement. However, since use of the AFW system is required as a matter of course, it is unnecessary to require a specific SR. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change removes the requirement to verify the normal AFW flow path to each SG following cold shutdown. The AFW System is not an accident initiator; therefore this change does not increase the probability of an accident. During restart of a unit from cold shutdown, the AFW system is used to maintain SG levels which provides verification that the flow paths have been established. Further formal requirements for verification do not provide any additional assurances. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-89 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

Under the current formal requirement, credit may be taken for use of the AFW system in maintaining SG levels during normal unit startup; therefore this is not a significant change. Therefore this change does not involve a significant reduction in the margin of safety since the AFW flow path to each SG is verified informally during each unit startup through the normal use of the system in maintaining the SG levels.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-91

This change will extend the surveillance interval for verification of AFW system automatic actuation to 24 months in support of planned refueling cycles of up to 24 months. CTS require this SR to be performed at 18 month intervals and allow this to be extended to 24 months under the provisions of CTS 4.0.A. CTS also specify that intervals between tests scheduled for refueling shutdowns shall not exceed two years and proposed SR 3.0.2 will retain this restriction. This change is acceptable because of the good performance of this system in these tests and the maximum interval for test performance is not changed. This change is consistent with the guidance of Generic Letter 91-04.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change clarifies and codifies the acceptability of repeatedly performing this surveillance at 24 month intervals when the CTS requires them to be performed every 18 months. The maximum surveillance interval is not changed by this proposed specification change. Since this system is not a design basis accident initiator, this change does not involve an increase in the probability of an accident. This system consistently performs well when tested and, due to allowed schedule flexibility, this change only extends the interval a small amount; therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-91 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This system has consistently performed well in these tests and, due to allowed schedule flexibility, this change will only extend the test interval a small amount. Therefore this change does not involve a significant reduction in a margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of Generic Letter 91-04.

Specific NSHD for Change L3.7-92

The CTS requirement to verify automatic valve position following actuation has been modified to exclude those valves which are "locked, sealed, or otherwise secured in position." Valves which are physically and administratively secured in position have been placed in the correct position prior to being secured and do not change their position upon system actuation of the system. Since these valves do not change their position when the system actuates, no further verification is required. Therefore the plant is maintained in a safe configuration with this change.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The valves under consideration in this change are associated with accident mitigation systems and thus are not accident initiators. Therefore this change does not involve an increase in the probability of an accident previously evaluated. Valves excluded from verification under this change are those that are already included in an administrative program to assure that they are always maintained in the correct position for accident mitigation. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-92 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

Some valves in the plant are physically and administratively secured in the correct post-accident position. This change excludes these valves from being verified to actuate to the post-accident position. Since these valves are already in the correct position as required by another plant program, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-93

The proposed change would allow an actual or simulated actuation signal to be used for testing of equipment. This is acceptable since either signal will provide a legitimate basis for determining equipment response. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change allows actual or simulated signals to be used for testing of equipment in conformance with the guidance of NUREG-1431. These tests are to assure that the equipment will function to mitigate the consequences of design basis events. Use of either an actual or simulated signal to perform the surveillance tests does not affect the consequences of a previously evaluated accident since either way the equipment is demonstrated to be operable. These tests are not assumed to be event initiators; therefore, this change does not involve an increase in the probability of an accident.

Thus this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change allows use of either an actual or simulated actuation signal for testing of TS required equipment and does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-93 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed change allows either actual or simulated signals to be used for testing of equipment in conformance with the guidance of NUREG-1431. Overall, the same test responses will be obtained and the same number of tests are required to be performed. These tests demonstrate that the TS required equipment will function as required. Thus, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-95

This change will require testing of the SG PORVs and their associated block valves in accordance with the schedule in the IST program in lieu of a specific TS required interval. This change may require testing of these valves quarterly rather than monthly which is acceptable since these valves usually pass this test.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change will require testing of the SG PORVs and their associated block valves in accordance with the schedule in the IST program which may require less frequent testing of these valves. Since these valves are not assumed design basis accident initiators, this change does not involve an increase in the probability of an accident. Since these valves have consistently performed well in their surveillance tests, they are likely to continue to perform well and be operable when required if the test interval is extended. Therefore, placing the test schedule for these valves under the IST Program does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-95 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

These valves have consistently performed well in these tests and therefore are likely to continue to perform well in tests on an extended test interval. The objective of these tests is to assure valve operability when these valves are required to mitigate a plant transient. Testing more frequently does not necessarily assure that the valves will operate when required, since testing too frequently may cause undesirable wear on equipment. Considering the good performance of these valves, testing these valves quarterly rather than monthly provides adequate assurance that these valves will perform as required. Therefore this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

Specific NSHD for Change L3.7-101

This change will extend the surveillance interval for ventilation filtration trains from 18 months to 24 months in support of planned refueling cycles of up to 24 months. CTS require this SR to be performed at 18 month intervals and allow this to be extended up to 24 months under the provisions of CTS 4.0.A. CTS also specify that intervals between tests scheduled for refueling shutdowns shall not exceed two years and proposed SR 3.0.2 will retain this restriction. This change is acceptable because of the good performance of this system in these system tests and the maximum interval for test performance is not changed. This change is consistent with the guidance of Generic Letter 91-04.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change clarifies and codifies the acceptability of repeatedly performing this surveillance at 24 month intervals when the CTS requires them to be performed every 18 months. The maximum surveillance interval is not changed by this proposed specification change. Since these systems are not a design basis accident initiator, this change does not involve an increase in the probability of an accident. These systems consistently perform well when tested and, due to allowed schedule flexibility, this change only extends the interval a small amount; therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-101 (continued)

3. The proposed amendment will not involve a significant reduction in the margin of safety.

These systems consistently perform well in these tests and, due to allowed schedule flexibility, this change will only extend the test interval a small amount. Therefore this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. This proposed change is consistent with the guidance of NUREG-1431.

Specific NSHD for Change L3.7-103

This change will extend the surveillance interval for verification of CRSVS and SFPSVS fan performance to 24 months on a STAGGERED TEST BASIS. Two changes are involved: 1) the current interval of 18 months is extended to 24 months in support of planned refueling cycles of up to 24 months; and 2) the testing would be performed on a staggered test basis. This change is acceptable because of the good performance of the system fans in these tests. Other tests verify that the fans will operate as required, this test verifies that the fans will move the specified volume of air. Changes in fan performance are likely to occur slowly over long time periods. Therefore, even with an extended test schedule, trends in fan performance are likely to predict pending unacceptable fan performance before the fans actually fail the test. Failure of this test does not mean total loss of function, but only that fans may move too little or too much air. Thus even if fan performance drifted out of the acceptable range, it could still perform most of its safety function. The change to 24 months is consistent with the guidance of Generic Letter 91-04. The change to performance of the test on a staggered test basis is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change will extend the surveillance interval for verification of CRSVS and SFPSVS fan performance to 24 months on a STAGGERED TEST BASIS. Since these systems are not design basis accident initiators, this change does not involve an increase in the probability of an accident. These systems consistently perform well when tested. Other tests verify that the fans will operate as required, this test verifies that the fans will move the specified volume of air. Changes in fan performance are likely to occur slowly over long time periods. Failure of this test does not mean total loss of function, but only that fans may move too little or too much air. Thus even if fan performance drifted out of the acceptable range, it could still perform most of its safety function. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

Specific NSHD for Change L3.7-103 (continued)

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

Changes in fan performance usually occur slowly over long time periods and, although the test interval is extended, trends in fan performance are likely to indicate pending unacceptable performance before the fans fail the test. Even if the fans fail to meet the requirements of this test, they could still perform most of their safety function. Therefore this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration. The proposal to change the test interval to 24 months is consistent with the guidance of Generic Letter 91-04. The proposed change to perform the test on a staggered test basis is consistent with the guidance of NUREG-1431.

ENVIRONMENTAL ASSESSMENT

The Nuclear Management Company has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration, or
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR Part 51 Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.

PACKAGE 3.7
PLANT SYSTEMS
CROSS - REFERENCE

CURRENT TECHNICAL SPECIFICATIONS
TO
IMPROVED TECHNICAL SPECIFICATIONS

List of Section Cross – References

3.3	4.7
3.4	4.8
3.6	4.13
3.7	4.14
3.8	4.15
3.12	4.19
3.13	4.20
4.4	Figures
4.5	Tables

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
UNITS 1 AND 2

Improved Technical Specifications
Conversion Submittal

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.3				
3.3.A.1.a		LCO	3.5.4	
New		SR	3.5.4.1	
3.3.A.1.a		SR	3.5.4.1	
3.3.A.1.a		SR	3.5.4.2	
3.3.A.1.b		LCO	3.5.1	
3.3.A.1.b.(1)		SR	3.5.1.1	
New		SR	3.5.1.1	
New		SR	3.5.1.2	
3.3.A.1.b.(2)		SR	3.5.1.2	
3.3.A.1.b.(3)		SR	3.5.1.4	
3.3.A.1.b.(4)		SR	3.5.1.3	
New		SR	3.5.1.3	
New		SR	3.5.1.5	
3.3.A.1.c		LCO	3.5.2	
3.3.A.1.d		LCO	3.5.2	
3.3.A.1.e		LCO	3.5.2	
New		LCO	3.5.3	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		SR	3.5.2.1	
New		SR	3.5.2.2	
New		SR	3.5.2.3	
New		SR	3.5.2.8	
New		SR	3.5.3.1	
3.3.A.1.f		LCO	3.5.3	
3.3.A.1.f		(Partial)	Relocated - Bases	
3.3.A.1.g (1)		SR	3.5.2.1	
3.3.A.1.g (1)		SR	3.5.2.3	
3.3.A.1.g (1)		(Partial)	Relocated - TRM	
3.3.A.1.g (2)		SR	3.5.2.1	
3.3.A.1.g (2)		SR	3.5.2.3	
3.3.A.1.g (2)		(Partial)	Relocated - TRM	
3.3.A.1.g (3)			Deleted	
3.3.A.1.g (4)			Relocated - TRM	
3.3.A.2		LCO	3.5.2	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.3.A.2.a			Relocated - Bases	
3.3.A.2.b			Relocated - Bases	
3.3.A.2.c			Relocated - Bases	
3.3.A.2.d			Relocated - Bases	
3.3.A.2.e		LCO	3.5.1	
New		LCO	3.5.1	
3.3.A.2.f		LCO	3.5.2	
3.3.A.2.g			Relocated - TRM	
New		LCO	3.5.4	
3.3.A.3		LCO	3.4.12	
3.3.A.3		LCO	3.4.13	
3.3.A.4		LCO	3.4.13	
3.3.A.5		LCO	3.4.12	
3.3.A.5		LCO	3.4.13	
3.3.B.1.a		LCO	3.6.5	
3.3.B.1.b		LCO	3.6.5	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.3.B.1.c		LCO	3.6.6	
3.3.B.1.c		(Partial)	Relocated - Bases	
3.3.B.1.d			Relocated - Bases	
3.3.B.1.e			Relocated - Bases	
New		LCO	3.6.5	
New		LCO	3.6.6	
3.3.B.2.a		LCO	3.6.5	
3.3.B.2.b		LCO	3.6.5	
New		SR	3.6.5.1	
3.3.B.2.c		LCO	3.6.6	
New		SR	3.6.6.1	
New		SR	3.6.6.2	
3.3.C.1.a		LCO	3.7.7	
3.3.C.1.a.1		LCO	3.7.7	
3.3.C.1.a.2			Relocated - Bases	
3.3.C.1.b		LCO	3.7.7	
3.3.C.1.b.1		LCO	3.7.7	
3.3.C.1.b.2			Relocated - Bases	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		SR	3.7.7.1	
3.3.C.2			Relocated - Bases	
3.3.D.1		LCO	3.7.8	
3.3.D.1.a			Relocated - Bases	
3.3.D.1.b			Relocated - Bases	
3.3.D.1.c			Relocated - Bases	
3.3.D.1.d		LCO	3.7.8	
New		LCO	3.7.8	
New		SR	3.7.8.3	
3.3.D.2		LCO	3.7.9	
3.3.D.2		LCO	3.7.8	
3.3.D.2.a		LCO	3.7.8	
3.3.D.2.a.(1)			Relocated - SFDP	
3.3.D.2.a.(2)			Relocated - SFDP	
3.3.D.2.a(3)		LCO	3.7.8	
3.3.D.2.b		LCO	3.7.8	
3.3.D.2.b(1)			Relocated - SFDP	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.3.D.2.b(2)		LCO	3.7.8	
3.3.D.2.b(2)		(partial)	Relocated - SFDP	
New		SR	3.7.8.1	
3.3.D.2.c		LCO	3.7.9	
3.3.D.2.d		LCO	3.7.9	
3.3.D.2.e		LCO	3.7.9	
New		SR	3.7.9.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.4				
3.4.A.1.a		LCO	3.7.1	
3.4.A.1.b		LCO	3.7.4	
New		LCO	3.7.1	
3.4.A.2		LCO	3.7.1	
3.4.A.2		LCO	3.7.4	
3.4.A.2.a		LCO	3.7.4	
3.4.B.1		LCO	3.7.5	
3.4.B.1.a		LCO	3.7.5	
3.4.B.1.b		LCO	3.7.5	
3.4.B.1.c		LCO	3.7.5	
New		SR	3.7.5.1	
New		LCO	3.7.2	
New		LCO	3.7.3	
New		SR	3.7.3.1	
New		SR	3.7.3.2	
3.4.B.1.d		LCO	3.7.6	
3.4.B.1.e			Relocated - TRM	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.4.B.1.f			Relocated - TRM	
3.4.B.1.g			Relocated - TRM	
3.4.B.2		LCO	3.7.5	
3.4.B.2		LCO	3.7.6	
New		LCO	3.7.5	
3.4.B.2.a		LCO	3.7.5	
3.4.B.2.a		SR	3.7.5.2 Note	
3.4.B.2.a		(Partial)	Relocated - Bases	
3.4.B.2.b			Relocated - Bases	
3.4.B.2.c		LCO	3.7.6	
New		SR	3.7.6.1	
3.4.B.2.d			Relocated - Bases	
3.4.B.2.e			Relocated - TRM	
3.4.C.1			Relocated - TRM	
3.4.C.2			Relocated - TRM	
3.4.D		LCO	3.7.14	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.6				
3.6.A.1		LCO	3.6.1	
3.6.A.2		LCO	3.6.1	
3.6.B.1		LCO	3.6.8	
3.6.B.1		(Partial)	Relocated - Bases	
3.6.B.2		LCO	3.6.8	
3.6.B.3		LCO	3.6.8	
3.6.C.1		LCO	3.6.3	
New		LCO	3.6.3	
3.6.C.2		LCO	3.6.3	
3.6.C.3.(a)		LCO	3.6.3	
3.6.C.3.(b)		LCO	3.6.3	
3.6.C.3.(c)		LCO	3.6.3	
New		LCO	3.6.3	
New		SR	3.6.3.1	
New		SR	3.6.3.3	
New		SR	3.6.3.4	
New		SR	3.6.3.5	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.6.D.1				Relocated - Bases
3.6.D.2.a				Relocated - Bases
3.6.D.2.b		SR	3.6.3.6	
3.6.D.2.c		LCO	3.3.5	
3.6.D.2.d		LCO	3.3.5 B	
3.6.D.2.e		SR	3.6.3.2	
3.6.E.1		LCO	3.7.12	
3.6.E.2				Relocated - TRM/Bases
3.6.E.3				Relocated - TRM/Bases
3.6.F.1		LCO	3.7.12	
3.6.F.1		(partial)		Relocated - TRM/Bases
3.6.F.2		LCO	3.7.12	
New		LCO	3.7.12	
3.6.G		LCO	3.6.10	
New		SR	3.6.10.1	
3.6.H		LCO	3.6.9	
3.6.I		LCO	3.6.4	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		SR	3.6.4.1	
3.6.J		SR	3.6.1.2	
3.6.K		SR	3.6.1.3	
3.6.L		LCO	3.6.7	
3.6.M		LCO	3.6.2	
New		LCO	3.6.2	
New		SR	3.6.2.2	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.7				
3.7.A		LCO	3.8.1	
3.7.A		LCO	3.8.4	
3.7.A		LCO	3.8.7	
3.7.A		LCO	3.8.9	
3.7.A.1		LCO	3.8.1	
3.7.A.2		LCO	3.8.9	
3.7.A.2		(Partial)	Relocated - Bases Table	
New		LCO	3.3.4.c	
3.7.A.3		LCO	3.8.9	
3.7.A.3		(Partial)	Relocated - Bases Table	
3.7.A.4		LCO	3.8.9	
3.7.A.4		(Partial)	Relocated - Bases Table	
3.7.A.5.a		LCO	3.7.8	
3.7.A.5.a		LCO	3.8.1	
3.7.A.5.a		LCO	3.8.3	
3.7.A.5.a		(Partial)	Relocated - Bases	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.7.A.5.b		LCO	3.8.1	
3.7.A.5.b		LCO	3.8.3	
3.7.A.5.b		(Partial)	Relocated - Bases	
3.7.A.6		LCO	3.8.4	
3.7.A.7		LCO	3.8.7	
3.7.A.7		(Partial)	Relocated - TRM	
New		LCO	3.8.2	
New		LCO	3.8.5	
New		LCO	3.8.6	
New		LCO	3.8.8	
New		LCO	3.8.10	
3.7.B		LCO	3.8.1	
3.7.B		LCO	3.8.4	
3.7.B		LCO	3.8.7	
3.7.B		LCO	3.8.9	
3.7.B.1		LCO	3.8.1	
3.7.B.1		SR	3.8.1.2	
3.7.B.2		LCO	3.8.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.7.B.3		LCO	3.8.1	
3.7.B.4		LCO	3.8.1	
New		LCO	3.8.1	
3.7.B.5		LCO	3.8.1	
New		LCO	3.8.3	
3.7.B.6		LCO	3.8.9	
3.7.B.6		(Partial)	Relocated - Bases	
3.7.B.7		LCO	3.8.4	
3.7.B.8		LCO	3.8.4	
3.7.B.9			Relocated - TRM	
New		LCO	3.8.3	
New		LCO	3.8.7	
New		LCO	3.8.9	
3.7.B Note*		LCO	3.8.1	
3.7.B Note**			Deleted	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.8				
3.8.A.1		LCO	3.9.4	
3.8.A.1.a.1		LCO	3.9.4	
3.8.A.1.a.2.a		LCO	3.9.4	
3.8.A.1.a.2.b.i			Relocated - TRM	
3.8.A.1.a.2.b.ii		LCO	3.9.4	
3.8.A.1.a.2.b.iii			Relocated - Bases	
3.8.A.1.a.2.b.iv		LCO	3.9.4	
New		SR	3.9.4.1	
New		SR	3.9.4.2	
3.8.A.1.b			Relocated - TRM	
3.8.A.1.c		LCO	3.9.3	
New		LCO	3.9.3	
3.8.A.1.c		(Partial)	Relocated - Bases	
New		SR	3.9.3.1	
New		SR	3.9.3.2	
3.8.A.1.d		LCO	3.9	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.8.A.1.e		LCO	3.9.2	
3.8.A.1.e		SR	3.9.2.1	
3.8.A.1.e		(Partial)	Relocated - Bases	
3.8.A.1.f		LCO	3.9.5	
3.8.A.1.f		LCO	3.9.6	
New		SR	3.9.5.1	
3.8.A.1.g		LCO	3.9.6	
New		LCO	3.9.6	
New		SR	3.9.6.1	
New		SR	3.9.6.2	
3.8.A.1.h			Relocated - TRM	
3.8.A.1.i			Relocated - TRM	
3.8.A.1.j		LCO	3.3.5	
3.8.A.2		LCO	3.9.2	
3.8.A.2		LCO	3.9.3	
3.8.A.2		LCO	3.9.4	
3.8.A.2		LCO	3.9.5	
3.8.A.2		LCO	3.9.6	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.8.A.3		LCO	3.9.5	
3.8.A.3		LCO	3.9.6	
3.8.B.1		LCO	3.7.16	
3.8.B.1.a			Relocated - TRM	
3.8.B.1.b			Relocated - TRM	
3.8.B.1.c		LCO	3.7.16	
3.8.B.2		LCO	3.7.16	
3.8.C			Relocated - TRM	
3.8.D.1		LCO	3.7.13	
3.8.D.2		LCO	3.7.13	
New		LCO	3.7.13	
3.8.D.3		LCO	3.7.13	
3.8.D.4		LCO	3.7.13	
New		LCO	3.7.15	
New		SR	3.7.15.1	
3.8.E.1		LCO	3.7.17	
3.8.E.2		LCO	3.7.16	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.12				
3.12		Relocated - TRM		

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3.13				
3.13.A.1		LCO	3.7.10	
3.13.A.2		LCO	3.7.10	
New		LCO	3.7.11	
New		SR	3.7.11.1	
New		SR	3.7.11.2	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.4				
4.4.A.1		SR		3.6.1.1
4.4.A.2		SR		3.6.2.1
4.4.A.3		SR		3.6.3.8
4.4.B.1		SR		3.6.9.5
4.4.B.1		(Partial)		Relocated - TRM
4.4.B.2		SR		3.7.12.3
4.4.B.2		(Partial)		Relocated - Bases
4.4.B.3		SR		3.6.9.2
4.4.B.3		SR		3.7.12.2
4.4.B.3		(Partial)		Relocated - VFTP
4.4.B.3.a				Relocated - VFTP
4.4.B.3.b				Relocated - VFTP
4.4.B.3.c		SR		3.6.9.3
4.4.B.3.c		SR		3.7.12.4
4.4.B.3.c		(Partial)		Relocated - Bases

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
4.4.B.3.c		(Partial)	Relocated - ODCM	
4.4.B.4.a		SR	3.6.9.2	
4.4.B.4.a		SR	3.7.12.2	
4.4.B.4.a		(Partial)	Relocated - VFTP	
4.4.B.4.b			Relocated - VFTP	
4.4.B.4.c			Relocated - VFTP	
4.4.B.4.d		SR	3.6.9.1	
4.4.B.4.d		SR	3.7.12.1	
4.4.B.5		SR	3.6.9.2	
4.4.B.5		SR	3.7.12.2	
4.4.B.5		(Partial)	Relocated - VFTP	
4.4.C		SR	3.6.1.1	
4.4.C		SR	3.6.8.1	
4.4.D			CTS Deleted	
4.4.E		SR	3.6.3.7	
4.4.E		SR	3.6.9.4	
4.4.E		SR	3.7.12.4	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
4.4.F		SR	3.6.5.7	
4.4.G		SR	3.6.1.2	
4.4.H		SR	3.6.1.3	
4.4.I.a		SR	3.6.7.1	
4.4.I.a		(Partial)	Relocated - Bases	
4.4.I.b		SR	3.6.7.2	
4.4.I.b		(Partial)	Relocated - Bases	
4.4.I.c		SR	3.6.7.3	
4.4.I.c		(Partial)	Relocated - Bases	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.5				
4.5.A.1.a		(Partial)	Relocated - Bases	
4.5.A.1.a		SR	3.5.2.6	
4.5.A.1.b			Relocated - Bases	
4.5.A.2.a		SR	3.6.5.6	
4.5.A.2.a		(Partial)	Relocated - Bases	
4.5.A.2.b		SR	3.6.5.8	
4.5.A.2.c			Relocated - Bases	
4.5.A.3		SR	3.6.5.3	
4.5.A.3		(Partial)	Relocated - Bases	
4.5.A.4.a		SR	3.7.7.2	
4.5.A.4.a		SR	3.7.7.3	
4.5.A.4.b			Relocated - Bases	
4.5.A.5.a		SR	3.7.8.5	
4.5.A.5.a		SR	3.7.8.6	
4.5.A.5.a		(Partial)	Relocated - Bases	
4.5.A.5.b			Relocated - TRM	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
4.5.B.1.a		(Partial)	Relocated - IST	
4.5.B.1.a		SR	3.5.2.4	
4.5.B.1.a		SR	3.6.5.4	
4.5.B.1.b		SR	3.7.8.2	
4.5.B.1.b		(Partial)	Relocated - Bases	
4.5.B.1.c		SR	3.7.8.4	
4.5.B.1.c		(Partial)	Relocated - Bases	
4.5.B.2		SR	3.6.5.2	
4.5.B.2		(Partial)	Relocated - Bases	
4.5.B.3.a			Relocated - IST	
4.5.B.3.b			Relocated - IST	
4.5.B.3.c			Deleted by Boric Acid LAR	
4.5.B.3.d			Relocated - IST	
4.5.B.3.e		SR	3.7.8.5	
4.5.B.3.e		(Partial)	Relocated - Bases	
4.5.B.3.f		SR	3.5.2.5	
4.5.B.3.f		SR	3.6.5.5	
4.5.B.3.f		SR	3.6.6.4	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
4.5.B.3.f		SR	3.7.7.2	
4.5.B.3.f		SR	3.7.8.5	
4.5.B.3.g.1			Relocated - TRM	
4.5.B.3.g.2			Relocated - TRM	
4.5.B.3.g.3		SR	3.5.2.7	
4.5.B.3.h			Relocated - TRM	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.7				
4.7		SR	3.7.2.1	
4.7		(partial)	Relocated - IST	
New		SR	3.7.2.2	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.8				
4.8.A.1		SR		3.7.5.2
4.8.A.1		(Partial)		Relocated - IST
4.8.A.2				CTS Deleted
4.8.A.3				Relocated - IST
4.8.A.4				Relocated - IST
4.8.A.5				Relocated - Bases
4.8.A.6				Deleted
4.8.A.7				Deleted
4.8.A.8		SR		3.7.5.3
4.8.A.8		SR		3.7.5.4
4.8.B		SR		3.7.4.1
4.8.C				Relocated - TRM

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.13				

4.13

Relocated-
TRM

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.14				
4.14.A		SR	3.7.10.3	
4.14.A.1			Relocated - VFTP	
4.14.A.2		SR	3.7.10.3	
4.14.B.1		SR	3.7.10.2	
4.14.B.1		(Partial)	Relocated - VFTP	
4.14.B.1.a			Relocated - VFTP	
4.14.B.1.b			Relocated - VFTP	
4.14.B.1.c		SR	3.7.10.4	
4.14.B.2			Relocated - VFTP	
4.14.B.3			Relocated - VFTP	
4.14.B.4		SR	3.7.10.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.15				
4.15.A		SR	3.7.13.3	
4.15.A.1			Relocated - VFTP	
4.15.A.2		SR	3.7.13.3	
4.15.B.1		SR	3.7.13.2	
4.15.B.1		(Partial)	Relocated - VFTP	
4.15.B.1.a			Relocated - VFTP	
4.15.B.1.b			Relocated - VFTP	
4.15.B.1.c		SR	3.7.13.4	
4.15.B.2			Relocated - VFTP	
4.15.B.3			Relocated - VFTP	
4.15.B.4		SR	3.7.13.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.19				
4.19			Relocated - TRM	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 4.20				
4.20		SR	3.7.17.2	
New		SR	3.7.17.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Figure				
Figure 2.1-1		FIGURE		2.1.1-1
Figure 3.1-3		FIGURE		3.4.17-1
Figure 3.8-1		FIGURE		3.7.17-1
Figure 3.8-2		FIGURE		3.7.17-2
Figure 3.10-1				Relocated - COLR
Figure 4.4-1				Relocated - TRM
Figure 5.6-1		FIGURE		4.3.1-1
Figure 5.6-2		FIGURE		4.3.1-2
Figure 5.6-3		FIGURE		4.3.1-3
Figure 5.6-4		FIGURE		4.3.1-4
Figure 5.6-5		FIGURE		4.3.1-5
Figure 5.6-6		FIGURE		4.3.1-6
Figure 5.6-7		FIGURE		4.3.1-7
Figure 5.6-8		FIGURE		4.3.1-8
Figure 5.6-9		FIGURE		4.3.1-9
Figure 5.6-10		FIGURE		4.3.1-10
Figure 5.6-11		FIGURE		4.3.1-11

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Figure 5.6-12		FIGURE	4.3.1-12	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section Table				
Table 1-1		TABLE	Table 1.1-1	
Table 1-1	Note *	LCO	3.9.1	
New		LCO	3.9.1	
Table 1-1	Note *	(Partial)	Relocated - COLR	
Table 1-1	Note **		Deleted	
Table 3.5-1	9	TABLE	3.3.5-1	Note c
Table 3.5-1	1	TABLE	3.3.2-1	1c
Table 3.5-1	2a	TABLE	3.3.2-1	2c
Table 3.5-1	2b	TABLE	3.3.2-1	4b
Table 3.5-1	3	TABLE	3.3.2-1	1d
Table 3.5-1	4	TABLE	3.3.2-1	1e
Table 3.5-1	4	TABLE	3.3.2-1	Note b
Table 3.5-1	5	TABLE	3.3.2-1	4c
Table 3.5-1	6	TABLE	3.3.2-1	4d
Table 3.5-1	7	SR	3.6.8.1	
Table 3.5-1	8		Relocated - TRM	
Table 3.5-1	9	TABLE	3.3.5-1	3

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-1	10	SR	3.3.4.2	
Table 3.5-2A	1	TABLE	3.3.1-1	1
Table 3.5-2A	2a	TABLE	3.3.1-1	2a
Table 3.5-2A	2b	TABLE	3.3.1-1	2b
Table 3.5-2A	3	TABLE	3.3.1-1	3a
Table 3.5-2A	4	TABLE	3.3.1-1	3b
Table 3.5-2A	5	TABLE	3.3.1-1	4
Table 3.5-2A	6	TABLE	3.3.1-1	5
Table 3.5-2A	7	TABLE	3.3.1-1	6
Table 3.5-2A	8	TABLE	3.3.1-1	7
Table 3.5-2A	9	TABLE	3.3.1-1	8a
Table 3.5-2A	10	TABLE	3.3.1-1	8b
Table 3.5-2A	11	TABLE	3.3.1-1	9
Table 3.5-2A	12	TABLE	3.3.1-1	10
Table 3.5-2A	13	TABLE	3.3.1-1	14
Table 3.5-2A	14	TABLE	3.3.1-1	13
Table 3.5-2A	15	TABLE	3.3.1-1	12
Table 3.5-2A	16a	TABLE	3.3.1-1	11a
Table 3.5-2A	16b	TABLE	3.3.1-1	11b

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	17	TABLE	3.3.1-1	15
Table 3.5-2A	18	TABLE	3.3.1-1	19
Table 3.5-2A	19	TABLE	3.3.1-1	17
Table 3.5-2A	20	TABLE	3.3.1-1	17
Table 3.5-2A	New Func	TABLE	3.3.1-1	16
Table 3.5-2A	New Func	TABLE	3.3.1-1	18
Table 3.5-2A	Act 1	LCO	3.3.1 B	
Table 3.5-2A	Action 1	LCO	3.3.1 M	
Table 3.5-2A	Action 2	LCO	3.3.1 D	
Table 3.5-2A	Action 2	LCO	3.3.1 E	
Table 3.5-2A	Act 2	SR	3.2.4.2	
Table 3.5-2A	Act 2c	SR	3.2.4.2	
Table 3.5-2A	Act 3	LCO	3.3.1 F	
Table 3.5-2A	New Action	LCO	3.3.1 G	
Table 3.5-2A	Action 4	LCO	3.3.1 H	
Table 3.5-2A	New Action	LCO	3.3.1 I	
Table 3.5-2A	Action 5	LCO	3.3.1 J	
Table 3.5-2A	Action 6	LCO	3.3.1 E	
Table 3.5-2A	Action 6	LCO	3.3.1 K	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	Action 6	LCO	3.3.1 N	
Table 3.5-2A	Action 7	LCO	3.3.1 O	
Table 3.5-2A	Act 8	LCO	3.3.1 C	
Table 3.5-2A	Action 9a	LCO	3.3.1 S	
Table 3.5-2A	Action 9a	LCO	3.3.1.P	
Table 3.5-2A	Action 9b	LCO	3.3.1 P	
Table 3.5-2A	Action 10	LCO	3.3.1 C	
Table 3.5-2A	Act 10	LCO	3.3.1 P	
Table 3.5-2A	Action11	LCO	3.3.1 L	
Table 3.5-2A	New Action	LCO	3.3.1 Q	
Table 3.5-2A	New Action	LCO	3.3.1 R	
Table 3.5-2A	New Action	LCO	3.3.1 S	
Table 3.5-2A	Note a	TABLE	3.3.1-1	Note a
Table 3.5-2A	Note b	TABLE	3.3.1-1	Note b
Table 3.5-2A	Note c	TABLE	3.3.1-1	Note d
Table 3.5-2A	Note d	TABLE	3.3.1-1	Note i
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note e
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note f
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note g

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note h
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note j
Table 3.5-2B	1a	TABLE	3.3.2-1	1a
Table 3.5-2B	1b	TABLE	3.3.2-1	1c
Table 3.5-2B	1c	TABLE	3.3.2-1	1e
Table 3.5-2B	1d	TABLE	3.3.2-1	1d
Table 3.5-2B	1e	TABLE	3.3.2-1	1b
Table 3.5-2B	2a	TABLE	3.3.2-1	2a
Table 3.5-2B	2b	TABLE	3.3.2-1	2c
Table 3.5-2B	2c	TABLE	3.3.2-1	2b
Table 3.5-2B	3a	TABLE	3.3.2-1	3c
Table 3.5-2B	3b	TABLE	3.3.2-1	3a
Table 3.5-2B	3c	TABLE	3.3.2-1	3b
Table 3.5-2B	4a	TABLE	3.3.5-1	5
Table 3.5-2B	4b	TABLE	3.3.5-1	1
Table 3.5-2B	4c	TABLE	3.3.5-1	6
Table 3.5-2B	4d	TABLE	3.3.5-1	4
Table 3.5-2B	4e	TABLE	3.3.5-1	3
Table 3.5-2B	4f	TABLE	3.3.5-1	2

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	5a	LCO	3.7.2	
Table 3.5-2B	5b	TABLE	3.3.2-1	4b
Table 3.5-2B	5c	TABLE	3.3.2-1	4d
Table 3.5-2B	5d	TABLE	Not used	
Table 3.5-2B	5e	TABLE	3.3.2-1	4a
Table 3.5-2B	6a	TABLE	3.3.2-1	5b
Table 3.5-2B	6b	TABLE	3.3.2-1	5c
Table 3.5-2B	6c		Relocated - TRM	
Table 3.5-2B	6d	TABLE	3.3.2-1	5a
Table 3.5-2B	7a		Relocated - TRM	
Table 3.5-2B	7b	TABLE	3.3.2-1	6b
Table 3.5-2B	7c	TABLE	3.3.2-1	6d
Table 3.5-2B	7c	TABLE	3.3.2-1	Note f
Table 3.5-2B	7d	TABLE	3.3.2-1	6e
Table 3.5-2B	7d*	TABLE	3.3.2-1	Note g
Table 3.5-2B	7e	TABLE	3.3.2-1	6c
Table 3.5-2B	7f	TABLE	3.3.2-1	6a
Table 3.5-2B	8a	LCO	3.3.4.a	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	8b	LCO	3.3.4.b	
Table 3.5-2B	9		Deleted - LAR	
Table 3.5-2B	Act 20	LCO	3.3.2 C	
Table 3.5-2B	Act 21	LCO	3.3.2 D	
Table 3.5-2B	Act 21	LCO	3.3.2 E	
Table 3.5-2B	Act 22	LCO	3.3.5 A	
Table 3.5-2B	Act 23	LCO	3.3.2 B	
Table 3.5-2B	Act 24	LCO	3.3.2 D	
Table 3.5-2B	Act 24	LCO	3.3.2 G	
Table 3.5-2B	Act 25	LCO	3.3.2 F	
Table 3.5-2B	Act 26	LCO	3.3.2 I	
Table 3.5-2B	Act 27	LCO	3.7.2	
Table 3.5-2B	Act 28	LCO	3.3.2 F	
Table 3.5-2B	Act 29	LCO	3.3.2 D	
Table 3.5-2B	Act 29	LCO	3.3.2 H	
Table 3.5-2B	Act 30	LCO	3.3.2 I	
Table 3.5-2B	Act 31	LCO	3.3.4 A	
Table 3.5-2B	Act 32		Deleted	
Table 3.5-2B	Act 33	LCO	3.3.4 B	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	Act 34		Deleted - LAR	
Table 3.5-2B	New Action	LCO	3.3.4 C	
Table 3.5-2B	New Action	LCO	3.3.4 D	
Table 3.5-2B	Act 35		Deleted - LAR	
Table 3.5-2B	Act 36		Deleted - LAR	
Table 3.5-2B	Note a	TABLE	3.3.2-1	Note a
Table 3.5-2B	Note b	TABLE	3.3.5-1	Note a, b
Table 3.5-2B	Note c	TABLE	3.3.2-1	Note c
Table 3.5-2B	Note c	LCO	3.7.2	
Table 3.5-2B	Note d	TABLE	3.3.2-1	Note c,d
Table 3.5-2B	New Note	TABLE	3.3.2-1	Note e
Table 3.15-1	1	TABLE	3.3.3-1	1
Table 3.15-1	2	TABLE	3.3.3-1	2
Table 3.15-1	3	TABLE	3.3.3-1	3
Table 3.15-1	4	TABLE	3.3.3-1	4
Table 3.15-1	5	TABLE	3.3.3-1	5
Table 3.15-1	6	TABLE	3.3.3-1	6
Table 3.15-1	7	TABLE	3.3.3-1	7
Table 3.15-1	8	TABLE	3.3.3-1	8

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.15-1	9	TABLE	3.3.3-1	9
Table 3.15-1	10	TABLE	3.3.3-1	10
Table 3.15-1	11	TABLE	3.3.3-1	11
Table 3.15-1	12	TABLE	3.3.3-1	12
Table 3.15-1	13	TABLE	3.3.3-1	13
Table 3.15-1	14	TABLE	3.3.3-1	14
Table 3.15-1	15	TABLE	3.3.3-1	15
Table 3.15-1	16	TABLE	3.3.3-1	16
Table 3.15-1	Action a	LCO	3.3.3	
Table 3.15-1	Action a1	LCO	3.3.3 A	
Table 3.15-1	Action a1	LCO	3.3.3 C	
Table 3.15-1	Action a2	LCO	3.3.3 D	
Table 3.15-1	Action a2	LCO	3.3.3 I	
Table 3.15-1	Action a3	LCO	3.3.3 D	
Table 3.15-1	Action a3	LCO	3.3.3 J	
Table 3.15-1	Action a4	LCO	3.3.3 E	
Table 3.15-1	Action a4	LCO	3.3.3 I	
Table 3.15-1	Action a5	LCO	3.3.3 B	
Table 3.15-1	Action a5	LCO	3.3.3 C	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.15-1	Action a5	LCO	3.3.3	
Table 3.15-1	Action a6	LCO	3.3.3 F	
Table 3.15-1	Action a6	LCO	3.3.3 G	
Table 3.15-1	Action a6	LCO	3.3.3 I	
Table 3.15-1	New Cond	LCO	3.3.3 H	
Table 3.15-1	Action b	TABLE	3.3.3-1	Note a
Table 3.15-1	Action c	TABLE	3.3.3-1	Note b
Table 3.15-1	New Note	TABLE	3.3.3-1	Note c
Table 4.1-1A	1	TABLE	3.3.1-1	1
Table 4.1-1A	2a	TABLE	3.3.1-1	2a
Table 4.1-1A	2a	TABLE	3.3.1-1	6
Table 4.1-1A	2a	TABLE	3.3.1-1	7
Table 4.1-1A	2b	TABLE	3.3.1-1	2b
Table 4.1-1A	3	TABLE	3.3.1-1	3a
Table 4.1-1A	4	TABLE	3.3.1-1	3b
Table 4.1-1A	5	TABLE	3.3.1-1	4
Table 4.1-1A	6	TABLE	3.3.1-1	5
Table 4.1-1A	7	TABLE	3.3.1-1	6
Table 4.1-1A	8	TABLE	3.3.1-1	7

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1A	9	TABLE	3.3.1-1	8a
Table 4.1-1A	10	TABLE	3.3.1-1	8b
Table 4.1-1A	11	TABLE	3.3.1-1	9
Table 4.1-1A	12	TABLE	3.3.1-1	10
Table 4.1-1A	13	TABLE	3.3.1-1	14
Table 4.1-1A	14	TABLE	3.3.1-1	13
Table 4.1-1A	15	TABLE	3.3.1-1	12
Table 4.1-1A	16a	TABLE	3.3.1-1	11a
Table 4.1-1A	16b	TABLE	3.3.1-1	11b
Table 4.1-1A	17	TABLE	3.3.1-1	15
Table 4.1-1A	18	TABLE	3.3.1-1	19
Table 4.1-1A	19	TABLE	3.3.1-1	17
Table 4.1-1A	20	TABLE	3.3.1-1	17
Table 4.1-1A	New Func	TABLE	3.3.1-1	16
Table 4.1-1A	New Func	TABLE	3.3.1-1	18
Table 4.1-1A	Note 1	TABLE	3.3.1-1	Note a
Table 4.1-1A	Note 2	TABLE	3.3.1-1	Note d
Table 4.1-1A	Note 3	TABLE	3.3.1-1	Note b
Table 4.1-1A	Note 4	SR	3.3.1.8	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1A	Note 4a	SR	3.3.1.15	
Table 4.1-1A	Note 5	SR	3.3.1.2	
Table 4.1-1A	Note 6	SR	3.3.1.3	
Table 4.1-1A	Note 7	SR	3.3.1.3	
Table 4.1-1A	Note 7	SR	3.3.1.11	
Table 4.1-1A	Note 8	SR	3.3.1.6	
Table 4.1-1A	Note 9	SR	3.3.1.4	
Table 4.1-1A	Note 9	SR	3.3.1.5	
Table 4.1-1A	Note 10	SR	3.3.1.8	
Table 4.1-1A	Note 10	(Partial)	Relocated - Bases	
Table 4.1-1A	Note 11	SR	3.3.1.9	
Table 4.1-1A	Note 11	SR	3.3.1.15	
Table 4.1-1A	Note 12	TABLE	3.3.1-1	18
Table 4.1-1A	Note 13		Relocated - Bases	
Table 4.1-1A	Note 14		Relocated - Bases	
Table 4.1-1A	Note 15	TABLE	3.3.1-1	17
Table 4.1-1A	Note 16	TABLE	3.3.1-1	Note i
Table 4.1-1A	New Note	SR	3.3.1.4	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1A	Note 17	SR	3.3.1.8	
Table 4.1-1A	Note 18		Relocated - TRM	
Table 4.1-1A	New Note	SR	3.3.1.16	
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note c
Table 4.1-1A	New Note	SR	3.3.1.16	
Table 4.1-1A	New Note	SR	3.3.1.10	
Table 4.1-1A	New Note	SR	3.3.1.11	
Table 4.1-1A	New Note	SR	3.3.1.12	
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note e
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note f
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note g
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note h
Table 4.1-1A	New Note	TABLE	3.3.1-1	Note j
Table 4.1-1B	1a	TABLE	3.3.2-1	1a
Table 4.1-1B	1b	TABLE	3.3.2-1	1c
Table 4.1-1B	1c	TABLE	3.3.2-1	1e
Table 4.1-1B	1d	TABLE	3.3.2-1	1d
Table 4.1-1B	1e	TABLE	3.3.2-1	1b

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1B	2a	TABLE	3.3.2-1	2a
Table 4.1-1B	2b	TABLE	3.3.2-1	2c
Table 4.1-1B	2c	TABLE	3.3.2-1	2b
Table 4.1-1B	3a	TABLE	3.3.2-1	3c
Table 4.1-1B	3b	TABLE	3.3.2-1	3a
Table 4.1-1B	3c	TABLE	3.3.2-1	3b
Table 4.1-1B	4a	TABLE	3.3.5-1	5
Table 4.1-1B	4b	TABLE	3.3.5-1	1
Table 4.1-1B	4b	SR	3.3.5.4	
Table 4.1-1B	4c	TABLE	3.3.5-1	6
Table 4.1-1B	4d	TABLE	3.3.5-1	4
Table 4.1-1B	4e	TABLE	3.3.5-1	3
Table 4.1-1B	4e	SR	3.3.5.1	
Table 4.1-1B	4e	SR	3.3.5.3	
Table 4.1-1B	4e	SR	3.3.5.5	
Table 4.1-1B	4f	TABLE	3.3.5-1	2
Table 4.1-1B	4f	SR	3.3.5.2	
Table 4.1-1B	5a	SR	3.7.2.1	
Table 4.1-1B	5a	(partial)	Relocated - IST	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1B	5b	TABLE	3.3.2-1	4b
Table 4.1-1B	5c	TABLE	3.3.2-1	4d
Table 4.1-1B	5d	TABLE	3.3.2-1	4c
Table 4.1-1B	5e	TABLE	3.3.2-1	4a
Table 4.1-1B	6a	TABLE	3.3.2-1	5b
Table 4.1-1B	6b	TABLE	3.3.2-1	5c
Table 4.1-1B	6c		Relocated - TRM	
Table 4.1-1B	6d	TABLE	3.3.2-1	5a
Table 4.1-1B	7a		Relocated - TRM	
Table 4.1-1B	7b	TABLE	3.3.2-1	6b
Table 4.1-1B	7c	TABLE	3.3.2-1	6d
Table 4.1-1B	7c	TABLE	3.3.2-1	Note f
Table 4.1-1B	7d	TABLE	3.3.2-1	6e
Table 4.1-1B	7e	TABLE	3.3.2-1	6c
Table 4.1-1B	7f	TABLE	3.3.2-1	6a
Table 4.1-1B	8	SR	3.3.4.2	
Table 4.1-1B	8	SR	3.3.4.1	
Table 4.1-1B	Note 20	SR	3.3.2.5	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1B	Note 21	TABLE	3.3.2-1	Note a
Table 4.1-1B	Note 22	SR	3.3.2.2	
Table 4.1-1B	Note 23	TABLE	3.3.2-1	Note c
Table 4.1-1B	Note 23	LCO	3.7.2	
Table 4.1-1B	Note 24	TABLE	3.3.5-1	Note d
Table 4.1-1B	Note 25		Deleted	
Table 4.1-1B	Note 26	LCO	3.3.5-1	
Table 4.1-1B	New Note	TABLE	3.3.2-1	Note e
Table 4.1-1B	7d	TABLE	3.3.2-1	Note g
Table 4.1-1C	1		Relocated - TRM	
Table 4.1-1C	2	SR	3.1.4.1	
Table 4.1-1C	2	SR	3.1.7.1	
Table 4.1-1C	2	(Partial)	Relocated - TRM	
Table 4.1-1C	2	(Partial)	Deleted	
Table 4.1-1C	3		Relocated - TRM	
Table 4.1-1C	4		Relocated - TRM	
Table 4.1-1C	5		Deleted - Boric Acid LAR	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1C	6		Relocated - TRM	
Table 4.1-1C	7		Deleted - Boric Acid LAR	
Table 4.1-1C	8	SR	3.3.3.1	
Table 4.1-1C	8	SR	3.3.3.2	
Table 4.1-1C	9		Deleted - Boric Acid LAR	
Table 4.1-1C	10	SR	3.6.8.1	
Table 4.1-1C	10	SR	3.6.8.2	
Table 4.1-1C	11	SR	3.3.4.1	
Table 4.1-1C	12		Deleted - Boric Acid LAR	
Table 4.1-1C	13		Relocated - TRM	
Table 4.1-1C	14		CTS Deleted	
Table 4.1-1C	15		Relocated - TRM	
Table 4.1-1C	16		Relocated - TRM	
Table 4.1-1C	17		Relocated - TRM	
Table 4.1-1C	18	SR	3.3.1.12	
Table 4.1-1C	19		Relocated - TRM	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1C	20		Relocated - TRM	
Table 4.1-1C	21	SR	3.3.3.1	
Table 4.1-1C	21	SR	3.3.3.2	
Table 4.1-1C	21	SR	3.3.3.3	
Table 4.1-1C	22		CTS Deleted	
Table 4.1-1C	23		CTS Deleted	
Table 4.1-1C	24		Relocated - TRM	
Table 4.1-1C	24	SR	3.3.6.5	
Table 4.1-1C	24	SR	3.3.6.2	
Table 4.1-1C	25	SR	3.4.12.4	
Table 4.1-1C	25	SR	3.4.12.5	
Table 4.1-1C	25	SR	3.4.13.5	
Table 4.1-1C	25	SR	3.4.13.6	
Table 4.1-1C	26		Relocated - TRM	
Table 4.1-1C	27		Relocated - TRM	
Table 4.1-1C	28		Relocated - TRM	
Table 4.1-1C	29	SR	3.3.3.1	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1C	29	SR	3.3.3.2	
Table 4.1-1C	29	(Partial)	Relocated - TRM	
Table 4.1-1C	30		Relocated - TRM	
Table 4.1-1C	31		Relocated - TRM	
Table 4.1-1C	Note 30	SR	3.1.7.1	
Table 4.1-1C	Note 31		Deleted	
Table 4.1-1C	Note 32		Relocated - TRM	
Table 4.1-1C	Note 33		Deleted - Boric Acid LAR	
Table 4.1-1C	Note 34		Deleted	
Table 4.1-1C	Note 35		Deleted	
Table 4.1-1C	Note 36		Deleted	
Table 4.1-1C	Note 37		Deleted	
Table 4.1-1C	Note 38	SR	3.4.12.4	
Table 4.1-1C	Note 38	SR	3.4.13.5	
Table 4.1-1C	Note 39	SR	3.6.8.2	
Table 4.1-1C	Note 39	SR	3.6.8.1	
Table 4.1-1C	New Note	SR	3.3.3.3	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-2A	1	SR	3.1.4.3	
Table 4.1-2A	1	(Partial)	Relocated - TRM	
Table 4.1-2A	2	SR	3.1.4.2	
Table 4.1-2A	3	SR	3.4.10.1	
Table 4.1-2A	4	SR	3.7.1.1	
Table 4.1-2A	5	SR	3.9.2.1	
Table 4.1-2A	6	SR	3.4.11.1	
Table 4.1-2A	7	SR	3.4.11.2	
Table 4.1-2A	8		CTS Deleted	
Table 4.1-2A	9	SR	3.4.14.1	
Table 4.1-2A	10		CTS Deleted	
Table 4.1-2A	11		Relocated - TRM	
Table 4.1-2B	1	SR	3.4.17.1	
Table 4.1-2B	2	SR	3.4.17.2	
Table 4.1-2B	3	SR	3.4.17.3	
Table 4.1-2B	4a	LCO	3.4.17	
Table 4.1-2B	4b	SR	3.4.17.2	
Table 4.1-2B	5		Relocated - TRM	

Current Technical Specification Cross-Reference

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-2B	6		Relocated - TRM	
Table 4.1-2B	7		Deleted in CTS	
Table 4.1-2B	8		Relocated - TRM	
Table 4.1-2B	8	SR	3.9.1.1	
Table 4.1-2B	9	SR	3.5.4.2	
Table 4.1-2B	10		Deleted by Boric Acid LAR	
Table 4.1-2B	11	SR	3.6.6.3	
Table 4.1-2B	12	SR	3.5.1.4	
Table 4.1-2B	13	SR	3.7.16.1	
Table 4.1-2B	14		Relocated - TRM	
Table 4.1-2B	15	SR	3.7.14.1	
Table 4.1-2B	16		Relocated - TRM	
Table 4.1-2B	Note 1	SR	3.4.17.3	
Table 4.1-2B	Note 2		Relocated - TRM	
Table 4.1-2B	Note 3	SR	3.9.1.1	
Table 4.1-2B	Note 4		Relocated - TRM	
Table 4.1-2B	Note 5		Deleted	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-2B	Note 6		Relocated - TRM	
Table 4.2-1	1	G	5.5.6	
Table 4.12-1		G	5.5.8	
Table 4.12-2		G	5.5.8	
Table 4.13-1			Relocated - TRM	

PACKAGE 3.7
PLANT SYSTEMS
CROSS - REFERENCE

IMPROVED TECHNICAL SPECIFICATIONS
TO
CURRENT TECHNICAL SPECIFICATIONS

Section Cross - Reference

Section 3.7

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
UNITS 1 AND 2

Improved Technical Specifications
Conversion Submittal

Improved Technical Specification Cross-Reference

ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
ITS Section 3.7				
3.7.1		LCO	3.4.A.1.a	
3.7.1		LCO	3.4.A.2	
3.7.1		LCO	New	
3.7.1.1		SR	Table 4.1-2A	4
3.7.2		LCO	New	
3.7.2		LCO	Table 3.5-2B	5a
3.7.2		LCO	Table 3.5-2B	Note c
3.7.2		LCO	Table 3.5-2B	Action 27
3.7.2		LCO	Table 4.1-1B	Note 23
3.7.2.1		SR	4.7	
3.7.2.1		SR	Table 4.1-1B	5a
3.7.2.2		SR	New	
3.7.3		LCO	New	
3.7.3.1		SR	New	
3.7.3.2		SR	New	
3.7.4		LCO	3.4.A.2	
3.7.4		LCO	3.4.A.1.b	

Improved Technical Specification Cross-Reference

ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.7.4		LCO	3.4.A.2.a	
3.7.4.1		SR	4.8.B	
3.7.5		LCO	3.4.B.1	
3.7.5		LCO	3.4.B.1.a	
3.7.5		LCO	3.4.B.1.b	
3.7.5		LCO	3.4.B.1.c	
3.7.5		LCO	New	
3.7.5		LCO	3.4.B.2	
3.7.5		LCO	3.4.B.2.a	
3.7.5.1		SR	New	
3.7.5.2		SR	4.8.A.1	
3.7.5.2 Note		SR	3.4.B.2.a	
3.7.5.3		SR	4.8.A.8	
3.7.5.4		SR	4.8.A.8	
3.7.6		LCO	3.4.B.1.d	
3.7.6		LCO	3.4.B.2	
3.7.6		LCO	3.4.B.2.c	
3.7.6.1		SR	New	
3.7.7		LCO	3.3.C.1	

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ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.7.7.1		SR	New	
3.7.7.2		SR	4.5.A.4.a	
3.7.7.2		SR	4.5.B.3.f	
3.7.7.3		SR	4.5.A.4.a	
3.7.8		LCO	3.3.D.1	
3.7.8		LCO	3.3.D.2	
3.7.8		LCO	3.3.D.2.a	
3.7.8		LCO	3.3.D.2.a(3)	
3.7.8		LCO	3.3.D.2.b	
3.7.8		LCO	3.3.D.2.b(2)	
3.7.8		LCO	3.7.A.5.a	
3.7.8		LCO	New	
3.7.8.1		SR	New	
3.7.8.2		SR	4.5.B.1.b	
3.7.8.3		SR	New	
3.7.8.4		SR	4.5.B.1.c	
3.7.8.5		SR	4.5.A.5.a	
3.7.8.5		SR	4.5.B.3.e	
3.7.8.5		SR	4.5.B.3.f	

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ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.7.8.6		SR	4.5.A.5.a	
3.7.9		LCO	3.3.D.2	
3.7.9		LCO	3.3.D.2.c	
3.7.9		LCO	3.3.D.2.d	
3.7.9		LCO	3.3.D.2.e	
3.7.9.1		SR	New	
3.7.10		LCO	3.13.A.1	
3.7.10		LCO	3.13.A.2	
3.7.10.1		SR	4.14.B.4	
3.7.10.2		SR	4.14.B.1	
3.7.10.3		SR	4.14.A	
3.7.10.3		SR	4.14.A.2	
3.7.10.4		SR	4.14.B.1.c	
3.7.11		LCO	New	
3.7.11.1		SR	New	
3.7.11.2		SR	New	
3.7.12		LCO	3.6.E.1	
3.7.12		LCO	3.6.F.1	
3.7.12		LCO	3.6.F.2	

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ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.7.12		LCO	New	
3.7.12.1		SR	4.4.B.4.d	
3.7.12.2		SR	4.4.B.3	
3.7.12.2		SR	4.4.B.4.a	
3.7.12.2		SR	4.4.B.5	
3.7.12.3		SR	4.4.B.2	
3.7.12.4		SR	4.4.B.3.c	
3.7.12.4		SR	4.4.E	
3.7.13		LCO	3.8.D.1	
3.7.13		LCO	3.8.D.2	
3.7.13		LCO	New	
3.7.13		LCO	3.8.D.3	
3.7.13		LCO	3.8.D.4	
3.7.13.1		SR	4.15.B.4	
3.7.13.2		SR	4.15.B.1	
3.7.13.3		SR	4.15.A	
3.7.13.3		SR	4.15.A.2	
3.7.13.4		SR	4.15.B.1.c	
3.7.14		LCO	3.4.D	

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ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.7.14.1		SR	Table 4.1-2B	15
3.7.15		LCO	New	
3.7.15.1		SR	New	
3.7.16		LCO	3.8.B.1	
3.7.16		LCO	3.8.B.1.c	
3.7.16		LCO	3.8.B.2	
3.7.16		LCO	3.8.E.2	
3.7.16.1		SR	Table 4.1-2B	13
3.7.17		LCO	3.8.E.1	
3.7.17.1		SR	New	
3.7.17.2		SR	4.20	
3.7.17-1		FIGURE	Figure 3.8-1	
3.7.17-2		FIGURE	Figure 3.8-2	