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January 11, 2001
IPN-01-003

U.S. Nuclear Regulatory Commission
Mail Stop O-P1-17
Washington, D.C. 20555-0001
ATTN: Document Control Desk

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Conversion to Improved Technical Specifications
Comments on Draft Safety Evaluation

REFERENCE: 1. NRC Letter dated December 7, 2000; "Draft Safety Evaluation Regarding Proposed Conversion to Improved Standard Technical Specifications," G. Wunder to M. Kansler.

Dear Sir:

This letter provides comments on the draft Safety Evaluation, as requested by Reference 1, for the proposed conversion to the Improved Technical Specifications for Indian Point 3. Comments are marked on the pages from the draft Safety Evaluation. Affected pages from the text of the Safety Evaluation and the Summary of Change Tables are provided in Attachment I.

There are no new commitments made in this letter. If you have any questions, please contact Mr. Ken Peters at 914-736-8029.

Very truly yours,


Robert J. Barrett
Vice President Operations
Indian Point 3 Nuclear Power Plant

STATE OF NEW YORK
COUNTY OF WESTCHESTER
Subscribed and sworn to before me
this 11 day of JANUARY 2001



Christina Leitmann
Notary Public, State of New York
Registration #01LE5070946
Qualified In Putnam County
My Commission Expires Jan. 6, 2003

cc: see next page

AC01

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ATTACHMENT I TO IPN-01-003

**PROPOSED CONVERSION TO
IMPROVED TECHNICAL SPECIFICATIONS
FOR INDIAN POINT 3**

COMMENTS ON NRC DRAFT SAFETY EVALUATION

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. [] TO FACILITY OPERATING LICENSE DPR-64

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-286

Similar changes on other pages not marked

1.0 INTRODUCTION

Indian Point Nuclear Generating Unit No. 3 (IP3) has been operating with Technical Specifications (TS) issued with the full power operating license (DPR-64) on April 5, 1976, as amended. By application dated December 11, 1998 (IPN-98-134), as supplemented by letters dated December 15, 1998 (IPN-98-139), May 17, 1999 (IPN-99-055), August 16, 2000 (IPN-00-059), September 14, 2000 (IPN-00-059), September 27, 2000 (IPN-00-71), and November XX, 2000 (IPN-00-YYY) [to be provided], New York Power Authority (NYPA) the licensee, proposed to convert the current Technical Specifications (CTS) to improved Technical Specifications (ITS). The conversion is based upon:

November 30, 2000 (IPN-00-085)

- NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, dated April 1995,
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and
- 10 CFR 50.36, "Technical Specifications," as amended July 19, 1995 (60 FR 36953).

See below

an additional letter was: September 8, 2000 (IPN-00-066)

Hereafter, the proposed or improved TS for IP3 are referred to as the ITS, the existing TS are referred to as the CTS, and the improved standard TS, such as in NUREG-1431 are referred to as the STS. The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1.

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of telephone conference calls that concluded on December 8, 1999. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as proposed changes to STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the IP3 ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the final safety

comment re: "NYPA"

*per Amendment 203, licensee is changed effective 11/21/2000
owner = Entergy Nuclear Indian Point 3, LLC
operator = Entergy Nuclear operations, Inc*

Enclosure

approval). NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TS for IP3 to be in accordance with 10 CFR 50.36.

Since the licensee prepared the December 11, 1998, application, a number of amendments to the IP3 operating license were approved. Table 1 provides the subjects of the amendments and the dates of issuance.

TABLE 1

Amendment No.	Description of Change	Date
185	Instrument SR Intervals Extended to 24 Months	12/16/98
186	SRC Audit Requirements and Management Title Changes	12/30/98
187	DG Testing when a DG is Inoperable	02/05/99 2/9/99
188	Relocation of SRC Review and Audit Requirements	02/25/99
189	Relocation of TS Regarding Movements of Irradiated Fuel	05/24/99
190	One Time Extension of EDG AOT	08/09/99
191	Removal of Footnote on DNB Analysis	09/02/99
192	Turbine Trip Setpoint Below P-8	09/08/99
193	Administrative Changes	09/14/99
194	EDG Requirements in Cold Shutdown	09/14/99
195	Removal of CIV Tables	09/16/99
196	SI Pump AOT	10/12/99
197	Control Rod Alignment	10/14/99
198	EDG Fuel Oil Storage Tanks	12/07/99
199	Generic Letter 89-01 (RETS) and 10 CFR 20 Changes	02/07/00
200	Relocate CVCS Specification	02/07/00
201	Deleted PORC Review of Fire Protection Procedure	03/13/00
202	P/T Limits	10/05/00

The licensee, in electing to implement the specifications of the STS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the IP3 ITS conversion. Table M is organized in ITS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive Changes to the CTS

Less restrictive requirements include deletions and relaxations to portions of the CTS requirements that are being retained in ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of: (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The IP3 design was also reviewed to determine if the specific design basis and licensing basis for IP3 are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

All of the less restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of the CTS requirements that can grouped in the following six categories:

- (1) Relaxation of Modes of Applicability (Category I)
- (2) Relaxation of Surveillance Requirement (Category II)
- (3) Relaxation of Completion Time (Category III)
- (4) Relaxation of Required Actions (Category IV)
- (5) Relaxation of LCO (Category V)
- (6) Relaxation of CTS Reporting Requirements (Category VI)

^{Six}
The following discussions address why portions of various specifications within each of these ten categories of information or specific requirements are not required to be included in ITS.

- (1) Relaxation of Modes of Applicability (Category I)

Reactor operating conditions are used in CTS to define when the LCO features are required to be operable. CTS applicabilities can be specific defined terms of reactor

Type 4 Relocated Redundant Requirements

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

Details of System Design and System Description Including Design Limits (Type 1)

The design of the facility is required to be described in the FSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA Program (FSAR Chapter 17). In 10 CFR 50.59, controls are specified for changing the facility as described in the FSAR which includes the new Technical Requirements Manual (TRM) by reference, and in 10 CFR 50.54(a) criteria are specified for changing the QA Program. In the ITS, the Bases also contain descriptions of system design. The IP3 administrative controls specification **ITS 5.5.10** specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled by NRC requirements, the FSAR, controlled design documents and drawings, or the TS Bases, as appropriate. Cycle-specific design limits are moved from the CTS to the Core Operating Limits Report (COLR) in accordance with Generic Letter 88-16. ITS Administrative Controls are revised to include the programmatic requirements for controlling the COLR.

ITS 5.5.13

Descriptions of System or Plant Operation (Type 2)

The plans for the normal and emergency operation of the facility are required to be described in the FSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the FSAR. In the ITS, the Bases also contain descriptions of system operation. CTS provides lists of acceptable devices that may be used to satisfy LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the FSAR, plant operating procedures, and the TS Bases, as appropriate.

*Revision 0, November 1972.
per proposed IP3 ITS*

Procedural Details for Meeting TS Requirements & Related Reporting Requirements (Type 3)

Details for performing action and surveillance requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the FSAR, and the ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this

operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.5, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. The QA Program is approved by the NRC and contained in FSAR Chapter 17, and changes to the QA Program are controlled by 10 CFR 50.54(a). The Offsite Dose Calculation Manual (ODCM) is required by ITS section 5.5.1. The TRM is incorporated by reference into the FSAR, and changes to the TRM are controlled by 10 CFR 50.59. The Inservice Test (IST) program is required by ITS 5.5.6 and is controlled by ITS 5.4.1.e.

→ 5.5.7 für IP3

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled by NRC requirements, the FSAR, plant procedures, Bases and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, removal of reporting requirements from LCOs is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

Relocated Redundant Requirements (Type 4)

Certain CTS administrative requirements are redundant to regulations and thus are relocated to the FSAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TS. Changes to the facility or to procedures as described in the FSAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QA plan, and ITS 5.5.13 governs changes to the ITS Bases. Therefore, relocation of the administrative details identified above, is acceptable.

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

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

Snubbers are required to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion. Snubbers are passive devices used for supporting piping systems, and the associated TS action statement requires that an inoperable snubber be replaced or repaired within 72 hours, and an engineering evaluation shall be conducted of the operability of the supported system. The consequences of an inoperable snubber can be an increase in the probability of structural damage to piping in the event of dynamic or thermal loads. The surveillance requirement for snubbers is that they be periodically examined under the inservice inspection program. The existing requirements that all snubbers be operable are requirements that do not identify a parameter that is an initial condition assumption for a DBA or transient, do not identify a significant abnormal degradation of the reactor coolant pressure boundary, and do not form part of the primary success path which functions or actuates to mitigate a design basis accident or transient. Snubber requirements, therefore, do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM. Further, the relocation of the lists of snubbers is consistent with GL 84-13.

(15) CTS 3.3.H, Toxic Gas Monitoring, (DOC R.18)

Toxic gas detection systems ensure that sufficient capability is available to promptly detect an accidental release of toxic material. These alarms allow operators to initiate protective action to isolate the control room. NRC requirements regarding the relationship of the toxic gas detection systems to the general design criteria (GDC) appear in NUREG-0800, "Standard Review Plan"; Regulatory Guide (RG) 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated hazardous Chemical Release"; and RG 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release." Generic Letter 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation," provides justification for relocating requirements for toxic gas monitoring out of the Technical Specifications. Toxic gas detection systems do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

4.3. A

(16) CTS (4.3.b) Reactor Coolant System Integrity Testing, (DOC R.19)

The inspection and repair programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity of these components will be maintained throughout the components life. Other Technical Specifications require important systems to be operable (for example, ECCS) and in a ready state for mitigative action. This Technical Specification, CTS 4.3.b, is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. The monitoring activity is of a preventive nature, rather than a mitigative action. Hence, it is not necessary to retain this Specification to ensure immediate operability of safety systems. Further, this Technical Specification prescribes inspection (and repair) requirements which are performed during plant shutdown. CTS 4.3.b does not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and has been relocated to the ~~ITS~~ Program.

see next page for revised R-DOC

FSAR

(17) CTS 4.10, Seismic Instrumentation, (DOC R.20)

The seismic monitoring instrumentation provides monitoring capability by recording information regarding the severity of an earthquake to permit comparison of the measured response to that used in the design basis of the facility to determine if the plant can continue to be operated safely and to permit such timely action as may be appropriate pursuant to 10 CFR Part 100, Appendix A. Since this is determined after the event has occurred, it has no bearing on the prevention or mitigation of any DBA or transient. The safety analysis requirements do not address the need for seismic monitoring instrumentation that would automatically shut down the plant when an earthquake occurs which exceeds a predetermined intensity. The seismic monitoring instrumentation is not relied upon by operators to take immediate action in the event of an

Justification for Relocation of CTS Requirement to
Licensee Controlled Document
Relocated Item R.19: REACTOR COOLANT SYSTEM INTEGRITY TESTING

LCO 4.3.A REACTOR COOLANT SYSTEM INTEGRITY TESTING

When Reactor Coolant System modifications or repairs have been made which involve new strength welds on components, the new welds will meet the requirements of ASME Section XI. Also, the reactor coolant system shall be tested for leakage prior to plant startup following each refueling outage.

DISCUSSION:

The inspection and repair programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity of these components will be maintained throughout the components life. Other Technical Specifications require important systems to be operable (for example, ECCS) and in a ready state for mitigative action. This Technical Specification is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. Hence, it is not necessary to retain this Specification to ensure immediate operability of safety systems. Further, this Technical Specification prescribes inspection (and repair) requirements which are performed during plant shutdown.

COMPARISON TO SCREENING CRITERIA:

1. The inspection and repair programs for ASME Code Class 1, 2, and 3 components stipulated by this Specification are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a design basis accident (DBA).
2. The inspection and repair programs for ASME Code Class 1, 2, and 3 components stipulated by this Specification are not a process variable, design feature, or operating restriction that is an initial assumption in a DBA or transient.
3. The ASME Code Class 1, 2, and 3 components inspected and/or repaired under this Specification are assumed to function to mitigate a DBA. Their capability to perform this function is addressed by other Technical Specifications. This Technical Specification only specifies inspection requirements for these components; and these inspections can

Justification for Relocation of CTS Requirement to
Licensee Controlled Document
Relocated Item R.19: REACTOR COOLANT SYSTEM INTEGRITY TESTING

only be performed when the plant is shutdown. Therefore, Criterion 3 is not satisfied.

4. As discussed in Section 4.0 (Appendix A, page A-43) and summarized in Table 1 of WCAP-11618 the assurance of operability of the entire system as verified in the system operability Specification dominates the risk contribution of the system. The lack of a long term assurance of structural integrity as stipulated by this Specification was found to be a non-significant risk contributor to core damage frequency and offsite releases. Entergy has reviewed this evaluation, considers it applicable to IP3, and concurs with the assessment.

CONCLUSION:

Since the screening criteria have not been satisfied, the Reactor Coolant System Integrity Testing LCO and Surveillances may be relocated to other plant controlled documents outside the Technical Specifications, such as the FSAR. Chapter 5.0 of the IP3 Improved Technical Specifications will contain a section which provides a programmatic approach to the requirements relating to the structural integrity of ASME Code Class 1, 2, and 3 components.

consideration of amendment published in the *Federal Register* [on date (XX FR YYYYYY) and on date (xx FR yyyyy)].

The changes discussed below are listed in the order of the applicable ITS specification or section, as appropriate (from ITS 3.3 to ITS 3.7.2).

(1) ITS 3.3 Setpoint and Allowable Changes Associated with the Adoption of the ITS

The following setpoints/allowable values were reviewed by the NRC staff:

<u>CTS/DOC</u>	<u>TS (ITS)</u>	<u>Title</u>	<u>CTS Setpoint</u>	<u>ITS Allowable Value</u>
2.3.1.A.(1) A.5	3.3.1.2.b	High flux, power range (low setpoint)	≤ 25% RTP	≤ 25% RTP ✓ OK
2.3.1.B.(1) A.4	3.3.1.2.a	High flux, power range (high setpoint)	≤ 109%	≤ 109% ✓ OK
2.3.1.B.(2) A.11	3.3.1.7.b	High pressurizer pressure	≤ 2385 psig	≤ 2408.24 psig REV 0 2400 REV 1
2.3.1.B.(3) A.10	3.3.1.7.a	Low pressurizer pressure	≥ 1800 psig	≥ 1749 psig REV 0 1790 REV 1
2.3.1.B.(4) A.8.e	3.3.1.5	Overtemperature DeltaT	Changes to the Equation	
2.3.1.B.(4) A.8	Table 3.3.1-1 Note 1	K1	1.20	≤ 1.285 ✓ OK
2.3.1.B.(4) A.8.c	Table 3.3.1-1 Note 1	tau Tow1	-	≥ 25 sec ✓ OK
2.3.1.B.(4) A.8.c	Table 3.3.1-1 Note 1	tau Tow2	-	≤ 3 sec ✓ OK
2.3.1.B.(5) A.9	3.3.1.6	Overpower DeltaT		
2.3.1.B.(5) A.9	Table 3.3.1-1 Note 2	K4	≤ 1.073	≤ 1.154 ✓ OK
2.3.1.B.(6)(a) A.13/14	3.3.1.9	Low reactor coolant loop flow	≥ 90%	≥ 89% ≥ 90% REV 0 REV 1
2.3.1.C.(1) A.12	3.3.1.8	High pressurizer water level	≤ 92%	≤ 97.47% ≤ 97% REV 0 REV 1
2.3.1.C.(2) A.19	3.3.1.13	Low-low steam generator water level	≥ 5%	≥ 3.54% ≥ 4.0% NR REV 0 REV 1
2.3.1.B.(6)(b) A.18	Table 3.3.1-1 Function 12	underfrequency RCPs	≥ 57.2 cps	≥ 57.22 cps

may be removed from this list because ITS allowable value is 'NA'?

-21-

2.3.1.C(3) A.21	3.3.1.15	Auto stop oil pressure	-	≥ 1.8 psig Rev 0	NA Rev 1
Table 3.5-1 Functional Unit 1 A.5	Table 3.3.2-1 Function 1.c	High Containment Pressure (Hi Level)	≤ 4.5 psig	≤ 4.80 psig	OK
Table 3.5-1 Functional Unit 2a A.12	Table 3.3.2-1 Function 2.c	High Containment Pressure (Hi-Hi Level) Containment Spray	≤ 24 psig	≤ 24.3 psig Rev 0	≤ 24 Rev 1
Table 3.5-1 Functional Unit 2b A.21	Table 3.3.2-1 Function 4c	High Containment Pressure (Hi-Hi Level) Steam Line Isolation	≤ 24 psig	≤ 24.3 psig Rev 0	≤ 24 Rev 1
Table 3.5-1 Functional Unit 2b A.18	Table 3.3.2-1 Function 3.b(3)	High Containment Pressure (Hi-Hi Level) Containment Isolation -phase B	≤ 24 psig	≤ 24.3 psig Rev 0	≤ 24 Rev 1
Table 3.5-1 Functional Unit 3 A.6	Table 3.3.2-1 Function 1.d	Pressurizer Low Pressure -Safety Injection	≥ 1700 psig	≥ 1684.64 psig Rev 0	≥ 1690 Rev 1

may be removed from this list because ITS allowable value is 'NA'?

- 22 -

Table 3.5-1 Functional Unit 4 A.7	Table 3.3.2-1 Function 1.e	High Differential Pressure Between Steam Lines - Safety Injection	≤ 150 psi	≤ 208 psi Rev 0	NA Rev 1
Table 3.5-1 Functional Unit 5 A.23/A.8	Table 3.3.2-1 Function 1.f	High Steam Flow in 2/4 Steam Lines Coincident with Tavg - Low - Safety Injection	≥ 540 F Tavg	≥ 535.6 F Rev 0	≥ 538 Rev 1
Table 3.5-1 Functional Unit 5.a A.9/A.23	Table 3.3.2-1 Function 1.g	High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure - Safety injection	≥ 600 psig	≥ 476.0 psig Rev 0	≥ 500 Rev 1
Table 3.5-1 Functional Unit 5.a A.8/A.22	Table 3.3.2-1 Note (c) Functions 1.f, 1.g, 4.d, 4.e	High Steam Flow in 2/4 Steam Lines Coincident with Tavg or Low Steam Line Pressure - Safety Injection & Steam Line Isolation	$\leq 49\%$	$\leq 54.4\%$ Rev 0	≤ 54 Rev 1
Table 3.5-1 Functional Unit 5.b A.9	Table 3.3.2-1 Function 4.d	High Steam Flow in 2/4 Steam Lines Coincident with low Tavg - Steam Line Isolation	≥ 540 F Tavg	≥ 535.6 Rev 0	≥ 538 Rev 1
Table 3.5-1 Functional Unit 5.a A.23	Table 3.3.2-1 Function 4.e	High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure - Steam Line Isolation	≥ 600 psig	≥ 476.0 psig Rev 0	≥ 500 Rev 1
Table 3.5-1 Functional Unit 6 A.26	Table 3.3.2-1 Function 6.b	Steam Generator Water Level (Low-Low) - Auxiliary Feedwater	$\geq 5\%$	$\geq 3.54\%$ Rev 0	≥ 4.0 NR Rev 1
Table 3.5-3 Functional Unit 1.d Note 3 A.30	Table 3.3.2-1 Function 1.d Note b, and Table 3.3.2-1 Function 7 (Pressurizer Pressure Interlock)	Pressurizer Low Pressure Safety Injection	≤ 2000 psig	<u>≥ 1998.24 psig</u> Rev 0	NA Rev 1

The licensee stated that their ITS allowable values are calculated in conformance with their Engineering Standards Manual IES-3 and IES 3-B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3). The licensee further stated that their calculation methodology provided sufficient allowance between the actual setpoint and the analytical limit to account for known instrument uncertainties including design basis accident temperature and radiation effects or process dependent effects.

In response to staff request for additional information the licensee confirmed that their calculation methodologies conform to Regulatory Guide 1.105, Instrument Setpoints for Safety-Related

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	1.0	1.0
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	1.0	1.0
A3	Not used.		
A4	Not used.		
A5	Not used.		

Certain CTS definitions that are not used in ITS are replaced by terms and definitions that are used in ITS.

(3.2.2)

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4 ✓	CTS specifies that $F_{\Delta H}^N$ is not required to be met "during low power physics tests," which are performed in Mode 2. ITS does not state this exception because the limits on power distribution are applicable only in Mode 1. This is an equivalent administrative change because it is consistent with existing CTS intent and current practice.	3.2.2	3.10.2.1
A5 ✓	CTS 3.10.2.2 includes "following initial core loading" as one of the required SR Frequencies for verifying $F_{\Delta H}^N$ limits are met. ITS does not specify this as a required frequency because initial fuel loading was a one-time event that has been completed. This is an equivalent administrative change.	SR 3.2.2.1	3.10.2.2
A6 ✓	CTS specify Actions if limits for either $F_D(Z)$ or $F_{\Delta H}^N$ are exceeded. ITS separates this into two limits, and there are no changes to the existing requirements. This is an equivalent administrative change.	3.2.2	3.10.2.2.2
A7	CTS specify that any event requiring plant shutdown on trip setpoint reduction shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS. This is an equivalent administrative change.	3.2.2	3.10.11

→ move to 3.2.2 LA.2

(3.2.4)

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	CTS specify that any event requiring plant shutdown on trip setpoint reduction shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS. This is an equivalent administrative change.	3.2.4	3.10.11
A9 ✓	CTS specify that when one excore detector is inoperable, then the remaining three (excore) detectors shall be used for computing the average; however, the CTS specify that if one excore detector is inoperable above 75% RTP, then core quadrant power balances shall be determined using movable incore detectors. ITS maintains these requirements. This is an equivalent administrative change.	3.2.4.1 SR 3.2.4.2	1.11 3.10.2.9
A10 ✓	CTS specify that if one excore detector is inoperable when operating above 75% RTP, then QPTR must be determined using incore detectors. ITS allows QPTR to be verified using incore detectors with any number of excore detectors inoperable. This is an equivalent administrative change that retains the intent and requirements of the CTS.	3.2.4 SR 3.2.4.2	3.10.2.9
A11 ✓	CTS require a power reduction to \leq 50% RTP if QPTR limits are not met within 24 hours for testing and evaluation. ITS require that reactor power be reduced to \leq 50% RTP if the Required Actions are not completed within the specified Completion Times. This is an equivalent administrative change that retains the intent and requirements of the CTS.	3.2.4	3.10.3.1.b

move to LA-3

(3.3.1)

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>The SRM Flux Function is not a SL or LCO in CTS since it backs up the Power Range Neutron Flux Low Trip in analyses. It must be operable in Mode 2 below P-6, and in Modes 3 to 5 if the Rod Control System can withdraw rods, or if any rod is not inserted fully. ITS require one channel of this function. If this function is inoperable, ITS require opening RTBs immediately. CTS require channel check shiftly; ITS do it every 12 hours. If not done the previous week, CTS require SRM response to simulated signal before startup. ITS extend COT frequency to 92 days. CTS do not require a COT during shutdown. CTS do not have an allowable value though CTS Bases indicate setpoint is about 1.0 E+5 cps. ITS identify TS Allowable Value as NA. Allowable value is in the ITS Bases at 1.0 E+5 cps. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 4 LCO 3.3.1 RA G.1 SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.8 SR 3.3.1.11 Table 3.3.1-1</p>	<p>2.3 Table 4.1-1 Item 3</p>

(3.3.1)

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>CTS unblock this Function at Power Range Nuclear Flux $\geq 10\%$ rated power or turbine first stage pressure $\geq 10\%$ equivalent full load. Above P-7, ITS require this Function in Mode 1. CTS require three operable channels, and redundancy of two; ITS require four channels, inoperable channels in trip. CTS trip inoperable channels. No CT is given, but one hour is reasonable. ITS allow six (less restrictive). With requirements unmet, CTS begin shutdown in four hours, complete in the following four to six. ITS give six or seven to reduce power $< P-7$ (more restrictive). CTS channel check shiftily; ITS have 12-hour check. CTS channel test quarterly; ITS do 92-day COT. CTS trip setpoint LSSS for Pressurizer Pressure-Low is ≥ 1800 psig; ITS allowable value is ≥ 1749 psig. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 7.a LCO 3.3.1 LCO 3.3.1 Condition H RA Note LCO 3.3.1 RA H.1 LCO 3.3.1 RA H.2 LCO 3.0.3 SR 3.3.1.7 SR 3.3.1.10</p>	<p>2.3.2.A 2.3.1.B(3) Table 3.5-2 Function 5 Table 3.5-2 Footnote * Table 4.1-1 Item 7 3.5-4</p>

1790

Function 7.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A11	<p>ITS modify CTS for Pressurizer Pressure High. In Modes 1 and 2, ITS have operability; CTS imply Applicability. CTS say two operable channels, one redundancy, i.e., three channels, maximum one in trip and implication that inoperable channels be in trip. ITS say three channels, inoperable ones in trip. CTS meet requirements by inoperable channels in trip. No CT is given, but an hour is reasonable; ITS allow six hours (less restrictive). With requirements unmet, CTS start shutdown in four hours, complete it in the following four to six; ITS have six or seven to be in Mode 3 (more restrictive). Changes to SRs in CTS Table 4.1-1, Item 7 for ITS 3.3.1, Function 7.b are same as for 7.a. CTS setpoint LSSS is ≤ 2385 psig; ITS allowable value is ≤ 2408.24 psig. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.0.3 LCO 3.1.1 RA E.1 3.3.1 Function 7.b 3.3.1 Condition E RA Note LCO 3.3.1 RA E.1 LCO 3.3.1 RA E.2</p>	<p>2.3.1.B.(2) 3.5 Table 3.5-2 Function 6 Table 3.5-2 Footnote * 3.5.4 Table 4.1-1 Item 7</p>

2400

Function 7.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
A12	<p>ITS modify the Pressurizer Pressure Low Function. CTS unblock this Function when power range nuclear flux $\geq 10\%$ rated power, or when turbine first stage pressure $\geq 10\%$ equivalent full load. Thus, Function is unblocked automatically above P-7. ITS have operability in Mode 1 above P-7. CTS require two operable channels with redundancy one. This means three channels, maximum one in trip, inoperable channels in trip. ITS require three channels, inoperable ones in trip. CTS channel check shiftily; ITS do it at 12 hours. CTS channel test quarterly; ITS do COT at 92 days. CTS and ITS calibrate at 24 months. CTS trip setpoint LSSS for Pressurizer-HI Water Level is $\leq 92\%$ span. ITS allowable value is 97.47% span. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 3.3.1 Function 7 3.3.1 Function 8 SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10</p>	<p>2.3.1.C(1) 2.3.2.A Table 3.5-2 Table 3.5-2 Function 5 Table 3.5-2 Function 7 Table 4.1-1 Item 6</p>

Water Level - High

Summary of Change

ITS Section

CTS Section

A12

ITS modify the Pressurizer Pressure Low Function. CTS unblock this Function when power range nuclear flux $\geq 10\%$ rated power, or when turbine first stage pressure $\geq 10\%$ equivalent full load. Thus, Function is unblocked automatically above P-7. ITS have operability in Mode 1 above P-7. CTS require two operable channels with redundancy one. This means three channels, maximum one in trip, inoperable channels in trip. ITS require three channels, inoperable ones in trip. CTS channel check shiftily; ITS do it at 12 hours. CTS channel test quarterly; ITS do COT at 92 days. CTS and ITS calibrate at 24 months. CTS trip setpoint LSSS for Pressurizer-HI Water Level is $\leq 92\%$ span. ITS allowable value is 97.47% span. Except as noted, these changes are equivalent administrative with no adverse safety effect.

3.3.1

2.3.1.C(1)

3.3.1

2.3.2.A

Function 7

Table 3.5-2

3.3.1

Table 3.5-2

Function 8

Function 5

SR 3.3.1.1

Table 3.5-2

SR 3.3.1.7

Function 7

SR 3.3.1.10

Table 4.1-1

Item 6

$\leq 92\%$

Function 8

Discussion of Change	Summary of Change	ITS Section	CTS Section
<p>A13</p>	<p>ITS modify Reactor Coolant Flow Low One Loop CTS. CTS Table 3.5-2, Function 8(a) is operable at > 50% RTP. Applicability and bypass for trip on loss of flow in one loop at < 50% RTP stay. CTS have two operable channels per loop with a redundancy one; i.e., three channels per loop, maximum one in trip, inoperable ones in trip. ITS have three channels per loop, inoperable ones in trip. With requirements unmet, CTS begin hot shutdown in four hours, completing it in the following four to six; ITS have six or seven (more restrictive). CTS do shiftly channel check; ITS do it at 12 hours. CTS do channel test quarterly; ITS do COT at 92 days. CTS and ITS calibrate every 24 months. CTS allowable value is $\geq 90\%$ normal indicated loop flow. ITS allowable value is $\geq 89\%$. Except as noted, changes are equivalent administrative with no adverse safety effect.</p> <p style="margin-left: 100px;">90%</p>	<p>3.3.1 Function 9</p> <p>3.3.1 Function 9 RA H.1</p> <p>3.3.1 Function 17.C</p> <p>Table 3.3.1-1 Note (e)</p> <p>LCO 3.3.1 Condition H RA Note</p> <p>LCO 3.0.3</p> <p>SR 3.3.1.7</p> <p>SE 3.3.1.10</p>	<p>2.3.1.B.6.a</p> <p>2.3.2.B</p> <p>Table 3.5-2 Function 8</p> <p>Table 3.5-2 Function 8(a)</p> <p>Table 3.5-2 Function 8(b)</p> <p>Table 3.5-2 Function 9</p> <p>Table 3.5-2 Footnote *</p> <p>Table 4.1-1 Item 5</p>

Function 9

Discussion of Change	Summary of Change (RCP Breaker Position - Single Loop)	ITS Section	CTS Section
A15	<p>ITS 3.3.1, Function 10.a is based on CTS 2.3.1.B.6(b) and Table 3.5-2, Item 11 >P-8. CTS bypass this Function at $\leq 50\%$ rated power. Above P-8, ITS have Mode 1. CTS have three operable channels with a redundancy of two, i.e., four channels, inoperable ones restored. ITS have one operable channel per RCP and restore inoperable ones in six hours. CTS meet requirements by tripping or restoring inoperable channels. No CT is given, but one hour is reasonable; ITS restore inoperable channels in six hours (less restrictive). With requirements unmet, CTS start shutdown in four hours, completing it in the following four-six. ITS give six or seven hours to be in Mode 3 (more restrictive). CTS calibrate each 24 months; ITS do 24-month TADOT, and modify TADOT definition. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 10.a</p> <p>3.3.1 Function 10.b</p> <p>LCO 3.3.1 Condition D RAs Note</p> <p>LCO 3.3.1 RA 1.1</p> <p>LCO 3.3.1 RA 1.2</p> <p>SR 2.2.1.13</p> <p>SR 3.3.1.14 Note</p>	<p>2.3.1.B.6(b)</p> <p>2.3.2.B</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>3.5-4</p> <p>Table 4.1-1 Item 8</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
<p>A16</p>	<p style="text-align: center;"><u>RCP Breaker Position - Two Loop</u></p> <p>ITS 3.3.1, modify CTS as follows. CTS allow this Function bypassed when at $\leq 10\%$ rated power. ITS require this Function operable in Mode 1 and say that it is required above P-7 and is not required above P-8. Changes to requirements for minimum operable channels are in DOC 15.b. CTS specify that requirements for channels and redundancy be met by placing inoperable channels in trip. No CT is specified, but one hour is reasonable; ITS allow six (less restrictive). With requirements unmet, CTS begin shutdown in four hours and complete it in the following four to six. ITS allow six or seven to reduce power < P-7 (more restrictive). CTS and ITS have an eight-hour channel bypass. Changes to SRs are in DOC A.15. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 10.b</p> <p>3.3.1 Function 10.b Note g</p> <p>LCO 3.3.1 RA H.1</p> <p>LCO 3.3.1 RA H.2</p> <p>LCO 3.3.1 Condition H RA Note</p>	<p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>Table 3.5-2 Footnote *</p> <p>3.5.4</p> <p>2.3.1.B.6(b)</p> <p>2.3.2.A</p>

Function
10.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
A17	<p>The ITS modify Undervoltage RCP (CTS). CTS may bypass at $\leq 10\%$ rated power; ITS require function in Mode 1 above P-7. CTS say three operable channels, two redundancy, i.e., four channels, inoperable ones in trip. ITS require one per bus, inoperable ones in trip. CTS have no CT to trip inoperable channels, but one hour is reasonable; ITS allow six (less restrictive). With unmet requirements, CTS begin shutdown in four hours, complete it in the following four to six; ITS allow six or seven to reduce power < P-7 (more restrictive). CTS channel test quarterly; ITS do 92-day TADOT. ITS take exception to TADOT definition. CTS trip LSSS for Undervoltage 6.9 kV Bus is $\geq 70\%$ normal voltage; ITS allowable value is 68.37%. Except as noted, these changes are equivalent administrative with no adverse effect on safety.</p> <p style="text-align: center;">-NA-</p>	<p>LCO 3.0.3 3.3.1 Function 11 LCO 3.3.1 RA H.1 LCO 3.3.1 RA H.2 LCO 3.3.1 Condition H RA Note LCO 3.3.1 Note e SR 3.3.1.9 SR 3.3.1.10</p>	<p>2.3.1.B(7) 2.3.2.A Table 3.5-2 Table 3.5-2 Footnote * Table 3.5-2 Function 10 Table 3.5-2 Item 8 3.5.4 Table 4.1-1 Item 8</p>

Function 11

Discussion of Change	Summary of Change	ITS Section	CTS Section
A18	<p>ITS modify CTS for Underfrequency RCPs. CTS have bypass at $\leq 10\%$ rated power; ITS have the Function In Mode 1 when $> P-7$. CTS have three operable channels and a redundancy of two; i.e., four channels, inoperable ones in trip. ITS have one operable channel per bus, inoperable ones in trip. CTS have no CT for inoperable channels in trip, but one hour is reasonable; ITS say six hours (less restrictive). With requirements unmet, CTS begin shutdown in four hours, complete in the following four to six. ITS say six or seven hours to reduce power $< P-7$ (more restrictive). CTS channel test quarterly; ITS do 92-day TADOT. ITS qualify TADOT definition. CTS trip setpoint LSSS for Underfrequency 6.9 kV Bus is > 57.2 cps. ITS allowable value is > 57.2 Hertz. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 12</p> <p>LCO 3.0.3</p> <p>3.3.1 Function 12</p> <p>LCO 3.3.1 RA H.1</p> <p>LCO 3.3.1 RA H.2</p> <p>LCO 3.3.1 Condition H RAs Note</p> <p>SR 3.3.1.9 Note</p> <p>SR 3.3.1.10</p>	<p>2.3.1.B.6.b</p> <p>2.3.2.A</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>3.5.4</p> <p>Table 4.1-1 Item 8</p>

≥ 57.22

Function 12

Discussion of Change	Summary of Change	ITS Section	CTS Section
A19	<p>ITS modify CTS for SG Water Level Low Low. With requirements unmet in Modes 1 and 2, CTS imply Applicability, and ITS require operability. CTS require two channels / loop, one channel / loop redundancy; i.e., three channels / loop, maximum one / loop in trip, inoperable ones in trip. ITS have three / SG, inoperable ones in trip. CTS give no CT for inoperable ones in trip, but one hour is reasonable; ITS allow six hours (less restrictive). With requirements unmet, CTS begin shutdown in four hours, ending in the following four-six. ITS say six or seven for Mode 3 (more restrictive). CTS channel check shiftily; ITS say 12 hours. CTS channel test quarterly; ITS do 92-day COT. CTS setpoint LSSS is $\geq 5\%$ narrow range span; ITS allowable value is $\geq 3.54\%$. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p> <p style="text-align: center;">$\geq 4.0\% NR$</p> <p style="text-align: left;">Function 13</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 13</p> <p>LCO 3.3.1 RA E.1</p> <p>LCO 3.3.1 RA E.2</p> <p>LCO 3.3.1 Condition E RAs Note</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.7</p>	<p>2.3.1.C(2)</p> <p>3.5</p> <p>Table 3.5-2 Function 9</p> <p>Table 3.5-2 Footnote *</p> <p>3.5.4</p> <p>Table 4.1-1 Item 10</p>
A20	Not used.		

Add description for Function 14
(see next page)

DOC	3.3.1 SUMMARY	ITS	CTS
A20	<p>ITS Table 3.3.1-1 is organized to identify applicability, required channels, condition, and surveillance requirements for Function 14, 'S/G water level - Low coincident with steam flow/ feedwater flow mismatch'. organizing this information in the ITS Table is an administrative change.</p> <p>The addition of this requirement to ITS is a more restrictive change. (3.3.1 DOC M9)</p>	<p>LCO 3.3.1 Function 14 Condition E</p>	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
<p>A21</p>	<p>ITS 3.3.1 Function 15 is based on CTS 2.3.1.C(3) and Table 3.5-2, Function 12. The ITS modify CTS for Turbine Trip-Low Fluid Oil Pressure. CTS Applicability is at $\geq 50\%$ RTP. ITS require Mode 1 when $> P-8$. CTS have two operable channels redundancy one; i.e., three channels, maximum one in trip, inoperable ones in trip. ITS have three channels, inoperable ones in trip. CTS meet requirements by placing inoperable channels in trip. No CT is given, but one hour is reasonable; ITS say six hours (less restrictive). With unmet requirements, CTS keep $<10\%$ full power. No CT is given; ITS allow six or seven hours to reach $< P-7$. CTS do not verify operability; ITS verify operability at 24 months (more restrictive). CTS have no setpoint LSSS; the ITS allowable value is ≤ 1.6 psig. Except as noted, these changes are equivalent administrative with no safety effect.</p> <p style="text-align: center;">NA</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 15</p> <p>3.3.1 Function 15 Note H</p> <p>3.3.1 Condition H RA Note</p> <p>LCO 3.3.1</p> <p>LCO 3.3.1 RA J.1</p> <p>LCO 3.3.1 RA J.2</p> <p>SR 3.3.1.5</p> <p>SR 3.3.1.10</p>	<p>2.3.2.B</p> <p>2.3.1.C(2)</p> <p>2.3.1.C(3)</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Function 12</p> <p>3.5.4</p> <p>Table 4.1-1 Item 21</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A27 ✓	ITS 3.3.1, Function 17.b provides an interlock that enables various RPS trips that are required only when operating above P-7 and disabling these trips when reactor power is below P-7. ITS keep these requirements as follows: a. ITS 3.3.1, Function 17.b, P-7, is required operable in Mode 1 to ensure that P-7 performs its design function b. ITS 3.3.1, Function 17.b, requires 2 operable trains of the P-7 function. c. ITS specify that if a channel is inoperable, the operator must verify interlock is in the required state for plant conditions. This means that the various ITS 3.3.1 functions enabled by this interlock are operable when required. d. ITS require periodic COTs and Channel Calibrations for this interlock e. Setpoints for this interlock are derived from ITS 3.3.1, Function 17.d and ITS 3.3.1, Function 17.e. Except as noted, each of the changes described is an equivalent administrative change with no adverse effect on safety.	3.3.1 Function 17.b Function 17.c Function 17.d Function 17.e 3.3.1 RA N.1 Table 3.3.1-1 SR 3.3.1.11 SR 3.3.1.13	None
A28 ✓	ITS 3.3.1, Function 17.c, is an interlock that automatically enables Reactor Coolant Flow — Low and RCP Breaker Position reactor trip on low flow in one or more RCS loops on increasing power. This interlock automatically enforces CTS. P-8 is actuated at about 50% RTP. ITS keep these requirements as follows: a. P-8, must be operable in Mode 1 to ensure that it performs its function. b. Function 17.c, requires four operable channels of P-8 Function. c. ITS say that if a channel is inoperable, the operator must verify interlock is as required for plant conditions. Thus, ITS 3.3.1 Functions enabled by the interlock must be operable when required. d. CTS have testing for P-8 consistent with testing for Nuclear Power Range Instruments. ITS keep this and do periodic COTs and Channel Calibrations for this interlock. e. CTS set trip setpoints for P-8 at nuclear flux \leq 50% rated power. <u>ITS 3.3.1, Function 17.c, keeps the CTS value as allowable.</u> Except as noted, this change is equivalent administrative with no adverse safety effect.	3.3.1 3.3.1 Table 3.3.1-1 3.3.1 RA N.1 SR 3.3.1.11 SR 3.3.1.13	2.3.2.B Table 4.1-1 Item 1 Remark 2

The ITS allowable value is 'NA' because there is no analytical limit modeled for this function

Discussion of Change	Summary of Change	ITS Section	CTS Section
A29	<p>ITS 3.3.1, Function 17.d is an interlock that automatically enables Functions 2.b and 3 on decreasing power. It also has a permissive to block SRM, IRM, and Power Range Neutron Flux-Low trips on increasing power. This automatically enforces CTS by serving as input to P-7. The P-10 interlock is actuated at about 10% RTP as determined by two-out-of-four NIS power range detectors. ITS keep these requirements as follows: a. Function 17.d, P-10, must be operable in Modes 1 and 2 to ensure that P-10 performs its design function. b. ITS require four operable channels of P-10 Function. c. ITS specify that if a channel is inoperable, the interlock must be in the required state for plant conditions. This requires that the ITS Functions enabled by this interlock be operable when required. d. CTS require testing for P-10 interlock consistent with testing for Nuclear Power Range Instruments. ITS keep this requirement and require periodic COT and Channel Calibrations for this interlock. e. ITS set trip setpoints for P-10 interlock at nuclear flux < 10% rated power. ITS keep the CTS allowable value. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Table 3.3.1-1</p> <p>3.3.1 Function 17.d</p> <p>3.3.1 Function 3</p> <p>3.3.1 RA M.1</p> <p>SR 3.3.1.13</p> <p>SR 3.3.1.11</p>	<p>2.3.2.A</p> <p>2.3.2.A.1</p> <p>Table 4.1-1 Item 1 Remark 2</p>

The ITS allowable value is 'NA' because there is no analytical limit model for this function.

Discussion of Change	Summary of Change	ITS Section	CTS Section
A30	<p>ITS 3.3.1, Function 17.e is one of the inputs to P-7 which is an interlock that enables various RPS trips that are required only when operating above P-7 and disabling these trips when reactor power is < P-7. This interlock automatically enforces requirements established by CTS. ITS keep these requirements as follows: a. ITS 3.3.1, Function 17.d, is required operable in Mode 1 to ensure that P-7 performs it's design function of ensuring that the various ITS 3.3.1 Functions enabled by this interlock are enabled before exceeding the P-7 setpoint. b. ITS 3.3.1, Function 17.b, requires 2 operable channels of the Turbine First Stage Pressure Function. c. ITS specify that if a channel is inoperable, the verify interlock is in the required state for plant conditions. Therefore, this requires that the various ITS 3.3.1 Functions enabled by this interlock are operable when required. d. CTS require daily Channels Checks, quarterly COTs, and 24 month Channels Calibrations. ITS and keep these requirements at the existing Frequency. e. CTS establishes the trip setpoints for the Turbine First Stage Pressure Interlock at nuclear flux > 10% of rated power. ITS will maintain the CTS value as the allowable value. Except as noted, each of the changes described is an equivalent administrative change with no adverse effect on safety.</p>	<p>3.3.1 RA N.1</p> <p>3.3.1 Function 17.b</p> <p>3.3.1 Function 17.d</p> <p>3.3.1 Function 17.e</p> <p>3.3.1 Table 3.3.1-1</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.11</p> <p>SR 3.3.1.13</p>	<p>2.3.2.A.2</p> <p>Table 4.1-1 Item 19</p>

the ITS allowable value is 'NA' because there is no analytical limit modeled for this function.

Discussion of Change	Summary of Change	ITS Section	CTS Section
A36	<p>The CTS set minimum requirements for protective instrumentation operability and specify the RAs if these requirements are unmet. Typically, these RAs specify hot shutdown. ITS specify specific RAs designed to place the plant outside the Applicability. This is an equivalent administrative change with no effect on safety since it is a reasonable interpretation of the existing CTS requirement.</p>	<p>LCO 3.3.1 LCO 3.3.2</p>	<p>Table 3.5-2 Table 3.5-3 Table 3.5-4</p>
A37	<p>The CTS allow channel bypass for up to eight hours during testing without taking RAs for an inoperable channel if Function trip capability is maintained. ITS keep this allowance for surveillance testing and for setpoint adjustment of other channels. In addition, ITS clarify the allowance as follows: when a channel or train is placed in an inoperable status solely for a required Surveillance, entry into associated Conditions and RAs may be delayed for up to eight hours provided the associated Function maintains RPS trip capability. This is an equivalent administrative change with no adverse effect on safety since it is a reasonable interpretation of the equivalent CTS requirement.</p>	<p>LCO 3.3.1 RAs Notes</p>	<p>3.5.4</p>

Per reply to
RAI 3.3.1 - 02

Discussion of Change	Summary of Change	ITS Section	CTS Section
<p>A6</p>	<p>The CTS ESF Initiation Applicability is >cold shutdown; low pressurizer pressure SI trip is unblocked at ≥ 2000 psig. ITS is Modes 1 to 3 above Pressure Interlock. For loss of redundancy or function, CTS restore immediately or go to hot shutdown in four hours, cold in 48. ITS differentiate between one and two inoperable channels not in trip. For redundancy loss, CTS trip inoperable ones immediately; ITS in six hours. The ITS go to Mode 3 in six hours, 4 in 18 for redundancy unrestored. For potential function loss, ITS use LCO 3.0.3. CTS check shiftly, test quarterly; ITS check at 12 hours, test at 92 days. Both calibrate every 24 months. CTS allowable is ≥ 1700 psig; ITS is ≥ 1684.64 psig. Change is equivalent administrative without adverse safety effect except as in DOCs.</p> <p style="margin-left: 150px;">≥ 1690</p>	<p>3.3.1 3.3.2 Function 1.d LCO 3.3.2 3.3.2 RA D.1 LCO 3.3.2 RA D.2.1 RA D.2.2 LCO 3.0.3 SR 3.3.2.1 SR 3.3.2.7 SR 3.3.2.4</p>	<p>Table 3.5-1 Item 3 Table 3.5-3 Item 1.d Table 3.5-3 Note 3 Table 3.5-3 Note 6 3.5.5 Table 4.1-1 Item 7 3.5.1 3.5.8</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS Applicability for ESF Initiation is > cold shutdown; ITS Applicability is In Mode 1 to 3 (less restrictive). CTS have three channels / steam line, and two channels / line in any line actuate. CTS have two operable channels / line with redundancy of one / line. This means three channels / line with maximum one / line in trip and implied requirement to trip inoperable ones. ITS have three channels / line, inoperable channels tripped. CTS have shiftly channel check, quarterly test, calibration at 24 months; ITS have channel check at 12 hours, operational test every 92 days, and calibration at 24 months. CTS testing allowances are kept. CTS set allowable at ≤ 150 psi; ITS set it at ≤ 208. These changes are equivalent administrative with no adverse safety effect except as noted.</p>	<p>3.3.2 Function 1.e RA D.1 SR 3.3.2.1 SR 3.3.2.4</p>	<p>3.5.1 Table 3.5-1 Item 4 Table 3.5-3 Item 4 Table 4.1-1 Item 18</p>

allowable value is 'NA' because this Function is not credited / modeled in the safety analysis.

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	<p>CTS Applicability is > cold shutdown; ITS is Mode 1-3 unless MSIVs are closed (less restrictive). For High Steam Flow, CTS have a channel / line in each of three lines, redundancy one / line in each of three lines; ITS have two operable channels / line, inoperable ones in trip (more restrictive). For T_{avg}-Low, CTS have three channels, two redundancy; i.e., a channel / loop, maximum one in trip, inoperable ones in trip. ITS have one / loop, inoperable ones in trip. For redundancy or function loss, CTS restore immediately or do hot shutdown in four hours, cold in 48. ITS differentiate between one and two inoperable channels in trip. For redundancy loss, CTS trip inoperable ones immediately, ITS in six hours. If not in trip in AOT, ITS do Mode 3 in six hours, 4 in 18. For function loss, ITS use LCO 3.0.3. CTS check shiftly, test quarterly; ITS check at 12 hours, COT at 92 days. Both calibrate at 24 months. CTS flow is $\leq 49\%$ full at 0 load and at 20%, $\leq 110\%$ at full load. CTS T_{avg} is ≥ 540 °F. ITS T_{avg}- Low is ≥ 535.6 °F. ITS flow is \leq turbine first stage pressure corresponding to 54.4% full flow at $< 20\%$ load; increasing to 110% flow at $\geq 100\%$. Change is equivalent administrative except as noted.</p>	<p>LCO 3.0.3 LCO 3.3.2 LCO 3.3.2 Function 1.f RA D.1 LCO 3.3.2 RA D.2.1 RA D.2.2 SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7</p>	<p>Table 3.5-1 Item 5 Table 3.5-1 Item 5.a Table 3.5-3 Item 1.e.1 Table 3.5-3 Note 6 Table 4.1-1 Item 4 Table 4.1-1 Item 18 Table 4.1-1 Item 19 Table 4.1-1 Item 45</p>

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Discussion of Change	Summary of Change	ITS Section	CTS Section
A9	<p>ITS 3.3.2, Function 1.g. is the same as CTS Table 3.5-1, Item 5, and Table 3.5-3, Item 1.e.2. Changes are as for Function 1.f. a. (See 3.3.2, DOC A.8.a). b. (See 3.3.2, DOC A.8.b. Same discussion; steam line pressure replaces T_{avg}). c. (See 3.3.2, DOC A.8.c). d. (See 3.3.2, DOC A.8.d for Steam Flow). CTS channel check shiftly, test quarterly; ITS do a 12-hour channel check, 92-day test. Both calibrate at 24 months. (See ITS 3.3.2, DOC A.36). e. (See 3.3.2, DOC A.8.e for Steam Flow). CTS Low Steam Line Pressure allowable is ≥ 600 psig; ITS is ≥ 476 psig. Change is from Engineering Standards Manual (See ITS 3.3.1, DOC L.1). f. (See 3.3.2, DOC A.8.f). Change is equivalent administrative with no adverse safety effect except as noted.</p> <p style="text-align: center;">500</p>	<p>3.3.1</p> <p>3.3.2 Function 1.f</p> <p>3.3.2 Function 1.g</p> <p>SR 3.3.2.1</p> <p>SR 3.3.2.4</p> <p>SR 3.3.2.7</p>	<p>Table 3.5-1 Item 5</p> <p>Table 3.5-3 Item 1.e.2</p> <p>Table 4.1-1 Item 18</p>
A10	<p>CTS ESF Initiation Applicability is above cold shutdown; ITS is in Modes 1 to 4. CTS have two operable channels, zero redundancy; ITS have two trains, two channels per train. CTS and ITS need two contacts for A and two for B. For redundancy loss, CTS have no RAs; with a required channel inoperable, ITS have both operable in 48 hours. For manual trip function loss, CTS go to hot shutdown in four hours, cold in 48; ITS use LCO 3.0.3. CTS omit manual initiation test, but do 24-month CS test. ITS verify manual initiation operability with 24-month TADOT, but omit setpoint verification. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 2a</p> <p>LCO 3.3.2 R.A. B.1</p> <p>LCO 3.0.3</p> <p>SR 3.3.2.6</p>	<p>Table 3.5-3 Item 2.a</p> <p>Table 3.5-3 Note 6</p> <p>Table 4.1-1 4.5.A.2.a</p>
A11	<p>ITS 3.3.2, Function 2.b. is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the operability of the ESFAS CS functions. This is an equivalent administrative change with no adverse safety effect.</p>	<p>3.3.2 Function 2.b</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A12	<p>CTS ESF Initiation Applicability is > cold shutdown; ITS is Mode 1-3. High Containment Pressure has two sets of three channels each. To actuate CS, two channels from each set energize. CTS have two operable channels per set, one channel per set redundancy; i.e., two sets of three channels, maximum one in each set in trip, inoperable channels in trip. ITS have two sets of three channels, inoperable ones tripped. For redundancy loss, CTS trip inoperable channels immediately; ITS in six hours. For redundancy unrestored in AOT, ITS do Mode 3 in six hours, 4 in 18. For function loss, ITS use LCO 3.0.3. In CTS only MSIVs are closed if only MSIV circuitry is affected. With only one function affected, ITS use only related RAs. CTS check shiftly, test quarterly; ITS check at 12 hours, test at 92 days. Both calibrate at 24 months. CTS allowable is ≤ 24 psig; ITS is ≤ 24.3 psig. Change is equivalent administrative with no adverse safety effect except as in justification.</p> <p style="text-align: center;">24</p>	<p>LCO 3.3.2</p> <p>3.3.2 Function 2.c RA E.1</p> <p>3.3.2 RA E.2.1</p> <p>3.3.2 RA E.2.2</p> <p>LCO 3.0.3</p> <p>SR 3.3.2.1</p> <p>SR 3.3.2.4</p> <p>SR 3.3.2.7</p>	<p>3.5-1</p> <p>Table 3.5-1 Item 2</p> <p>Table 3.5-3 Item 2.b Note 8</p> <p>Table 3.5-3 Note 6</p> <p>Table 4.1-1 Item 14.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A13	<p>a. CTS set Applicability for ESF Initiation Instruments as > cold shutdown. ITS require this function operable in Mode 1-4. b. CTS require 1 operable channel with redundancy zero, but IP3 design includes 2 channels such that either will initiate both trains of Phase A Isolation. ITS require two operable channels. d. CTS do not set a specific requirement to test the Containment Phase A Isolation-Manual Initiation Function, but require that CIVs be tested according to the Containment Leak Rate Test Program. Consistent with this requirement, ITS keep requirements to verify operability of the manual initiation function by doing a TADOT at 24 months. The SR is modified by a Note excluding verification of setpoints during the TADOT for manual initiation functions since these functions have no associated setpoints. e. There is no allowable value or setpoint associated with this function. f. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by NYPA and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Except as noted, the change is equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 3.a(1) SR 3.3.2.6</p>	<p>Table 3.5-4 Item 1.c Table 4.1-1 3.5.1 4.4</p>
A14	<p>ITS 3.3.2, Function 3.a.2, Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable in order to support the operability of all ESFAS Containment Phase A Isolation Functions. This is an equivalent and administrative change.</p>	<p>3.3.2 Function 3.a.2</p>	<p>None</p>
A15	<p>This Function consists of a contact that initiates Containment Phase A Isolation as a result of an SI signal. CTS Table 3.5-4, Item 1.a. references CTS for CTS requirements for this Function. ITS 3.3.2, Function 3.a.(3), Containment Phase A Isolation-SI, refers to Function 1 for all initiation functions and requirements. This cross reference is appropriate since all requirements for inputs to the Containment Phase A Isolation-SI are appropriately addressed by SI requirements and all outputs are addressed by ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. Thus, there are no changes to CTS requirements except as discussed elsewhere. This is an equivalent administrative change.</p>	<p>3.3.2 Function 3.a(3) Function 3.a(2)</p>	<p>Table 3.5-3 Item 1.b Table 3.5-4 Item 1.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A16	ITS 3.3.2, Function 3.b.(1) is equivalent to CTS Table 3.5-4, Item 1.c. CTS Table 3.5-4, Item 1.c references Table 3.5-3, Item 2(a) as the source of requirements for this Function. This is not correct. CTS Table 3.5-4, Item 1.c, has the same design, operability requirements, and testing Requirements as CTS Table 3.5-4, Item 1.c). (See ITS 3.3.2, DOC A.13 for a discussion of the changes for this Function.) This is an equivalent administrative change.	3.3.2 Function 3.b.1	Table 3.5-3 Item 2(a) Table 3.5-4 Item 1.c
A17	ITS 3.3.2, Function 3.b(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the Operability of all ESFAS Containment Phase B Isolation Functions. This is an equivalent administrative change.	3.3.2 Function 3.b(2)	None
A18	ITS 3.3.2, Function 3.b.(3) Containment Phase B Isolation-Containment Pressure , is equivalent to CTS Table 3.5-1, Item 2.a, and CTS Table 3.5-4, Item 1.b., Containment Pressure. ITS modify CTS as follows: a. (See ITS 3.3.2, DOC A.12.a). b. c. (See ITS 3.3.2, DOC A.12.b with the exception that the Actions specified in CTS Table 3.5-3, Note 6, are identical to the Actions specified CTS Table 3.5-4, Note 1, for this Function. d. e. f. Confirmation of the applicability of WCAP-10271 to IP3 has already been confirmed by NYPA and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Each of the changes described is an equivalent administrative change with no adverse effect on safety except as noted with a cross reference to the associated justification.	3.3.2 Function 3.B(3)	Table 3.5-1 Item 2.a Table 3.5-4 Item 1.b

CTS and ITS allowable values are as discussed in Doc A.12

Discussion of Change	Summary of Change	ITS Section	CTS Section
A19	<p>CTS Applicability for ESF Initiation is > cold shutdown; with requirements unmet, CTS allow cold shutdown or shutting all MSIVs. Unless MSIVs are closed, ITS require this Function in Modes 1-3 (less restrictive). CTS have a channel per loop, zero redundancy; ITS have two channels per line (more restrictive). For manual trip redundancy loss, CTS have no RAs since CTS have only one operable channel with zero redundancy for manual initiation. ITS say that with one of two required channels inoperable, both must be operable in 48 hours. With requirements unmet in AOT, CTS and ITS put plant outside applicability for Function 4.a. For manual trip function loss, CTS have hot shutdown in four hours, cold in 48; ITS use LCO 3.0.3. CTS do not test Steam Line Isolation-Manual Initiation, but test MSIV closing at 24 months. ITS keep requirement to verify manual initiation with 24-month TADOT. SR is modified by a Note omitting setpoint verification during TADOT for manual initiation functions. Unless noted, each is an equivalent administrative change without adverse safety effect.</p>	<p>3.3.2 Function 4.a</p> <p>LCO 3.3.2 RA F.1</p> <p>SR 3.3.2.6</p>	<p>Table 3.5-4 Item 2.c</p> <p>Table 3.5-4 Note 1</p> <p>Table 4.1-1 4.7</p>
A20	<p>ITS 3.3.2, Function 4.b., Steam Line Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the operability of all ESFAS Steam Line Isolation Functions. This is an equivalent administrative change.</p>	<p>3.3.2 Function 4.b</p>	<p>None</p>
A21	<p>ITS 3.3.2, Function 4.c., is equivalent to CTS Table 3.5-1, Item 2.b, and Table 3.5-4, Item 2.b. ITS modify CTS as follows: a. b. c. Both CTS and ITS require only that the plant be placed outside the applicability for Function 4.c, which can be achieved by closing all of the MSIVs even if the plant remains in Mode 2 or 3. d. (See ITS 3.3.2, DOC A.12.d). e. (See ITS 3.3.2, DOC A.12.e). f. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by NYPA and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Each of the changes described above is an equivalent administrative change with no adverse effect on safety except as noted with a cross reference to the associated justification.</p>	<p>3.3.2 Function 4.c</p>	<p>Table 3.5-1 Item 2.b</p> <p>Table 3.5-4 Item 2.b</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A22	<p>ITS 3.3.2, Function 4.d., is equivalent to CTS Table 3.5-1, Item 5.b, and Table 3.5-4, Item 2.a.1. The ITS conversion modifies the CTS requirements as follows: a. b. c. d. e. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by NYPA and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. However, to conform to the assumptions of WCAP-10271, ITS 3.3.2, Function 4.d will increase requirements for steam flow channels to require 2 channels per steam line on all 4 steam lines (See 3.2.2, DOC M.2). Each of the changes described above is an equivalent administrative change with no adverse effect on safety except as noted in the associated justification.</p>	3.3.2 Function 4.d	Table 3.5-1 Item 5.b Table 3.5-4
A23	<p>ITS 3.3.2, Function 4.e., is equivalent to CTS Table 3.5-1, Item 5.b, and to CTS Table 3.5-4, Item 2.a.2 (Steam Line Isolation) High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure. ITS modify CTS as follows: a. b. c. (See 3.3.2, DOC A.9.c for changes to the RAs for this Function.) d. (See 3.3.2, DOC A.9.d, for a discussion of changes to Surveillance Testing for this Function.) e. (See 3.3.2, DOC A.9.e, for a discussion of changes to the allowable values for this Function.) f. (See 3.3.2, DOC A.22.f, for a discussion of verification of conformance with the assumptions of WCAP-10271.) Each change described is an equivalent administrative change with no adverse effect on safety except as noted with a cross reference to the associated justification.</p>	3.3.2 Function 4.e	Table 3.5-1 Item 5.b Table 3.5-4 Item 2.a.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A30	<p>ITS 3.3.2, Function 7, is equivalent to CTS 3.5.5 and Table 3.5-3, Item 1.f. The ITS modify CTS as follows: a. See ITS 3.3.2, DOC A.6.a and L.4 for Applicability. b. See ITS 3.3.2, DOC A.6.b for number of channels. c. CTS Table 3.5-3, Note 5, say Minimum Operable Channels and Redundancy may be zero if SI bypass is unblocked. ITS say that, with one or more channels inoperable, operators verify interlock is as required. Otherwise, inoperable Pressurizer Pressure-Low shutdown requirements apply. See ITS 3.3.2, DOC A.6.c. d. See ITS 3.3.2, DOC A.6.d for Surveillances. e. CTS specify unblocked low pressurizer pressure SI trip when pressure is > 2000 psig. The ITS allowable is > 1998.24 psig. Unless noted, these are equivalent administrative changes.</p> <p><i>'NA' because the function is not credited in the safety analysis.</i></p>	<p>3.3.2 Function 7</p> <p>3.3.2 RA K.1</p>	<p>Table 3.5-3 Item 1.f</p> <p>Table 3.5-3 Note 5</p> <p>3.5.5</p>
A31	<p>CTS specify that operation may continue for instrumentation testing or channel failure; and, no more than one channel of a particular protection channel set shall be tested at once. ITS set equivalent requirements and allowances by having specific RAs for each Function. Specifically, ITS 3.3.1 RAs and Notes establishing testing time limits always require verification that the inoperable channel does not result in a loss of trip function before allowable OOS time may be applied for testing or inoperability. In addition, the ITS RA Notes limit the number of channels made inoperable by testing by requiring that the trip function be maintained during testing. This is an equivalent administrative change with no effect on safety since there is no change to existing CTS requirements.</p>	<p>3.3.1 RAs</p>	<p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>
A32	<p>ITS 3.3.2, ESFAS Instrumentation Actions, are preceded by a Note saying, "Separate Condition entry is allowed for each Function." This explicitly recognizes that the ITS allow completely separate re-entry into any Condition for each train and/or channel addressed by the Condition. This includes separate tracking of CTs based on this re-entry. This is consistent with an unstated assumption in the CTS. The addition of this Note is an equivalent administrative change with no adverse safety effect.</p>	<p>3.3.2</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS 3.8.A establishes requirements for fuel handling operations both in the containment and in the fuel storage building. CTS 3.8.B specifies that if any of these requirements are not met, then refueling shall cease until the specified limits are met, and no operations which may increase the reactivity of the core shall be made. ITS LCO 3.3.8, Required Action A.1.2, which applies to the FSBEVS only, maintains the requirement to stop handling of irradiated fuel in the FSB. However, the requirement to halt operations which may increase the reactivity of the core is retained in the appropriate specifications of Section 3.9, Refueling Operations (3.9.1, Boron Concentration, and 3.9.2, Nuclear Instrumentation). This change is acceptable because FSBEVS Operability is not assumed in the analysis of a fuel handling accident in containment. This is an administrative change with no adverse effect on safety because it is an explicit statement of a reasonable interpretation of the existing requirement.</p>	LCO 3.3.8 RA A.1.2	3.8.A 3.8.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	CTS specify that the reactor be brought to hot shutdown immediately with $T_{avg} \leq 500$ °F using normal operating procedures for failure to meet specific activity limits. Under the same conditions, the equivalent ITS specify the completion time to be in Mode 3 with $T_{avg} < 500$ °F as within 6 hours. This is an equivalent administrative change.	3.4.16	3.1.D.3 3.1.D.4
A5	CTS establish primary coolant activity levels in units of $\mu\text{Ci/cc}$ for both Dose Equivalent I-131 and gross specific activity. ITS keep the same numerical limits but express them in units of $\mu\text{Ci/g}$. This is an equivalent administrative change.	LCO 3.4.16	3.1.D.1
A6	CTS limit primary coolant activity when the reactor is critical or average RCS temperature is > 500 °F. The equivalent ITS limit primary coolant activity in Modes 1 and 2 and in Mode 3 with RCS average temperature ≥ 500 °F. However, minimum temperature for criticality limits significantly > 500 °F ensures that CTS primary coolant activity requirements apply before the CTS allow the reactor to be put in a status equivalent to ITS Mode 2. Thus, CTS and ITS requirements are identical. CTS does not have periodic verification of CTS 3.1.D.1.a, but require isotopic analysis for I-131, 133, and 135 at the identical frequency that ITS require verification of Dose Equivalent Iodine-131. Thus, CTS Table 4.1-2, Item 1, is the requirement for periodic verification of CTS 3.1.D.1.a consistent with the definition of "Dose Equivalent Iodine-131" in CTS. The fact that CTS Table 4.1-2, Item 1, does not mention I-132 and 134 does not relax the CTS 3.1.D.1.a requirement for Dose Equivalent Iodine-131 consistent with the CTS definition and, so, is either an error or a shorthand notation. This is an equivalent administrative change.	LCO 3.4.16 SR 3.4.16.2	3.1.D.1 3.1.D.1.a Table 4.1-2, Item 1 1.15

3.5.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require at least one RHR subsystem operable for ECCS injection in Mode 4. ITS keeps this requirement, but ITS LCO 3.5.3 is modified by a Note that allows an RHR subsystem to be considered operable for the ECCS initiation function during alignment and operation for decay heat removal if the RHR subsystem can be realigned manually to the ECCS mode and is not otherwise inoperable. Although this allowance is not specifically stated in CTS, the CTS requirements imply that an RHR pump can satisfy both the ECCs and decay heat removal requirements concurrently and CTS do not require operability of ECCS automatic initiation functions in Mode 4. Thus, the ITS is consistent with CTS current practice and intent.</p>	LCO 3.5.3	3.3.A.1.c 3.3 3.3.A.6.a

and during valve testing

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM			
<p>M2</p> <p><i>moved from m-3 by NRC reviewer</i></p> <p><i>Re number as A7 ?</i></p>	<p>CTS 3.3.B.3 establishes the Actions required if the Spray Additive System is not restored to meet CTS requirements within specified completion times. CTS 3.3.B.3.a specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown (Mode 3) within 4 hours and cold shutdown (Mode 5) within the following 24 hours. However, if the reactor is subcritical when requirements are not met, CTS 3.3.B.3.b requires only that reactor coolant system temperature and pressure not be increased more than 25°F and 100 psi, respectively, over existing values with the requirement to proceed to cold shutdown (Mode 5) deferred by 48 hours. The CTS markup shows CTS 3.3.B.3.b as being deleted. The deletion is justified as a more restrictive change and states that under the same condition stated above, ITS 3.6.7 Required Actions B.1 and B.2 require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours (Required Action B.2) regardless of the status of the unit when the condition is identified. The allowance of 48 hours provided in CTS 3.3.B.3.b is deleted. This justification is not entirely correct. The statement implies that if the Spray Additive System is determined to be inoperable while in Mode 3, then an immediate shutdown is commenced such that Mode 5 is reached within 84 hours. The CTS for this type of condition would allow 24 hours to restore the systems to Operable status before entering CTS 3.3.B.3.b where an additional 48 hours would be allowed before shutting down to Mode 5. In the ITS for this condition, ITS Action A would be entered first. If the system could not be restored to Operable status within the specified Completion Time of this Action, then ITS 3.6.7 Action B would be entered. Under this scenario the changes associated with CTS 3.3.B.3.b would be an Administrative change for the Spray Additive System (CTS: 24 + 48 = 72 hours, to ITS of 72 hours).</p>	3.6.7 Actions	3.3.B.3 3.3.B.3.a 3.3.B.3.b

3.6.7

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.7	3.3.B 4.5.A.2 4.5.B.2
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS. This is consistent with the intent of the CTS.	3.6.7	3.3
A3	CTS 3.3.B.1 specifies the Applicability for containment cooling and iodine removal systems as whenever the reactor is above cold shutdown. ITS 3.6.7 maintains this Applicability by requiring that the Spray Additive System be Operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety because there is no change to the CTS Applicability.	3.6.7 Applicability	3.3.B.1
A4	Not used.		
A5	Not used.		
A6	Not used.		

→ more new A.7 here ?

3.7.9

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	CTS do not include any specific requirements or guidance related to the effect on SW System operability when components or systems supported by SW are isolated. The equivalent ITS is modified by a Note indicating that the isolation of the SWS components or systems may render those components inoperable, but does not affect the Operability of the SW System.	LCO 3.7.9 NOTE	3.3.F
A7	CTS specify that isolation must be maintained between the essential and nonessential headers at all times except that for a period of eight hours the headers may be connected while another essential header is being placed in service. The equivalent ITS maintains and clarifies this requirement. This is an equivalent administrative change with no effect on safety.	3.7.9	3.3.F.4
ITS SPECIFICATION 3.7.10 - UHS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.10	3.3.F
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.10	3.3.F

f add 3.7.9, A 8 see next page

3.7.9

Doc

summary

ITS
SECTION

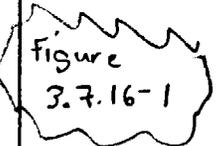
CTS
SECTION

3.7.9
Condition E

3.3.F.1.a

A.8 CTS ~~3.3.F.1.a~~ specifies that SWS pumps '.... together with their associated piping and valves are operable.' ITS maintains the same requirement by providing a required action and completion time for SWS piping and valves that are inoperable for reasons other than the remaining defined conditions as long as there is no loss of safety function.

3.7.16

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS specifies requirements for the spent fuel pit minimum boron concentration. However, no explicit actions are specified if these limits are not met. The equivalent ITS specifies RAs which are a reasonable interpretation of the existing requirements. This is an equivalent administrative change with no effect on safety.</p>	<p>3.7.16 Actions </p>	<p>3.8.C.7 Figure 3.8-1 Figure 3.8-2</p>
A4	<p>CTS specify requirements for fuel assembly storage locations in the spent fuel pit based on a combination of initial enrichment and burnup. However, no explicit requirements are specified for verification that these requirements for fuel assembly storage locations. The equivalent ITS requires verification by administrative means that the initial enrichment and burnup of each fuel assembly and the storage location are appropriate. This is an equivalent administrative change with no effect on safety.</p>	<p>SR 3.7.16.1</p>	<p>3.8.C.7</p>
A5	<p>CTS specify requirements for fuel assembly storage locations in the spent fuel pit based on a combination of initial enrichment and burnup. However, no explicit requirements are specified if the requirements for fuel assembly storage locations are not met. The equivalent ITS maintains the requirements for fuel assembly storage locations and adds actions to be initiated immediately to move a noncomplying fuel assembly from the improper location. This is an equivalent administrative change with no effect on safety.</p>	<p>3.7.16 Actions</p>	<p>3.8.C.7</p>

CTS specifies restrictions on spent fuel storage locations as shown in two figures. ITS maintains the same restrictions but combines the two CTS figures into one ITS figure and revises the nomenclature used to improve clarity.

3.8.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS specify that DG fuel oil requirements for three DGs apply when above cold shutdown and that DG fuel oil requirements for two DGs apply under all conditions. ITS specify an Applicability of "when associated DG is required to be OPERABLE." Thus, changes to the Applicability for CTS 3.7.A are described and justified as part of ITS LCO 3.8.1 and changes to the Applicability for CTS 3.7.F are described and justified as part of ITS LCO 3.8.2. This is an equivalent administrative change with no effect on safety because the applicability of ITS LCO 3.8.3 is just a more specific statement of the existing requirement and any differences between the ITS and CTS requirements are described and justified as part of ITS LCOs 3.8.1 and 3.8.2.</p>	<p>LCO 3.8.2 LCO 3.8.1 LCO 3.8.3</p>	<p>3.7.A</p>
A6	<p>Above cold shutdown, CTS require each DG fuel oil tank to have 6,671 gallons fuel oil, and under all conditions, a combined total of 6,671 gallons fuel oil must be in the DG fuel oil tanks. ITS require the same, but set requirements in terms of useable fuel, not tank volume. Thus, ITS specify 5,891 gallons of usable fuel as the minimum for DG fuel oil tank volume. This is an equivalent administrative change since both CTS and ITS require a minimum usable inventory of 5,891 gallons. In both CTS and ITS Bases, the ITS criterion of 5,891 gallons is the usable volume in the tank and does not include allowances for fuel unusable due to the oil transfer pump cutoff switch, a required safety margin, and instrument uncertainty allowances. Thus, if installed level indicators measure tank volume, 6,721 gallons of oil must be in each tank. This ensures that usable fuel volume is determined correctly during shutdown if the inventory is in more than one tank. In addition, this increases flexibility if volume is obtained by sounding rather than using installed instrumentation.</p>	<p>LCO 3.8.3 SR 3.8.3.2 CONDITION A SR 3.8.3.2 CONDITION B</p>	<p>3.7.A.5 3.7.F.4</p>
A7	<p>CTS establish requirements for properties of DG fuel oil in the DG fuel oil reserve. Specifically, DG fuel oil in the fuel oil reserve must be "compatible for operation with the diesels." This requirement is maintained in ITS. This is an equivalent administrative change.</p>	<p>5.5.12</p>	<p>3.7.A.5</p>

(Also, see L4)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN			
	NONE		
ITS SPECIFICATION 3.8.6 - BATTERY CELL PARAMETERS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.6	4.6
A2	CTS 4.6.B requires verification that battery cell parameters are within acceptable limits for battery Operability; however, no acceptance criteria is established. Therefore, IP3 procedures that implement CTS include acceptance criteria based on IEEE-450 and manufacturer's recommendations. ITS include acceptance criteria for battery cell parameters needed for battery Operability which are identified as Category C Allowable Limits. In addition ITS add the acceptance criteria for battery cell temperature. This is an administrative change with no impact on safety because the acceptance criteria identified as ITS Table 3.8.6-1, Category C Allowable Limits, and ITS are consistent with the acceptance criteria in IP3 procedures. The addition of new Category A and B limits in ITS Table 3.8.6-1 is a more restrictive change.	3.8.6 TABLE 3.8.6-1 SR 3.8.6.3	4.6.B

(Also, see MI)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS			
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.1	6.8.1
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.5.1	6.8.1 4.6.1
A3	CTS specify that changes to the ODCM are effective upon review and acceptance by the PORC and the approval of the Site Executive Officer. ITS 5.5.1 specifies that changes to the ODCM are effective after the approval of the plant manager. Requirements review and approval of programs and procedures by PORC and the SRC are quality assurance functions and are not retained in the ITS. Requirements review and approval of programs and procedures and requirements for the PORC and the SRC oversight and review function are moved to the Quality Assurance Plan which will establish requirements equivalent to those found in the CTS. This is an equivalent administrative change.	ETS 4.6.2.2	5.5.1

Indian Point - Unit 3

A-5

Section 5

CTS requires that the ODCM be approved by the NRC. The requirement is already satisfied and changes to the ODCM are controlled by ITS 5.5.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.2	6.14
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.5.2	6.14 FOL Paragraph 2L
ITS SPECIFICATION 5.5.3 - POST ACCIDENT SAMPLING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.3	6.8

The IP3 FOL requires implementation of a program to reduce leakage of radioactive fluids outside containment. ITS 5.5.2 maintains the requirement but names of affected systems have been modified to be consistent with STS.

5.5.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	<p>The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.</p>	5.5.4	<p>6.8.1.k 6.8.4.a</p>
ITS SPECIFICATION 5.5.5 - COMPONENT CYCLIC OR TRANSIENT LIMIT			
	NONE		
ITS SPECIFICATION 5.5.6 - RCP FLYWHEEL INSPECTION PROGRAM			
	NONE		

CTS specifies that the opem must place limits on the operability of radioactive effluent monitoring instrumentation and treatment systems. ITS maintains the requirement and uses the term functional capability to replace the CTS defined term, operability.

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change.	5.5.7	4.2
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	5.5.7	4.2

are not needed to describe the requirements established in ITS 5.5.7

5.5.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	<p>The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.</p> <p><i>are not needed to describe the requirements established in ITS 5.5.8.</i></p>	5.5.8	4.9
A3	<p>Facility Operating License DPR-64, paragraph J, required an inspection of all four steam generators no later than March 31, 1982 and Nuclear Regulatory Commission approval before bringing the reactor critical following this inspection. This inspection was completed as required; therefore, this requirement does not apply. This is an equivalent administrative change with no effect on safety.</p>	NONE	Facility Operating License DPR-64 paragraph J
A4	<p>CTS specify that the first inservice inspection of SGs should be performed after six effective full power months but not later than completion of the first refueling outage. This inspection frequency is a one time only requirement that is no longer applicable. This is an equivalent administrative change with no effect on safety.</p>	NONE	4.9.A.4.a
A5	<p>ITS add a specific statement that the provisions of SR 3.0.2 apply to the SG Tube Surveillance Program test frequencies. This is an equivalent administrative change with no significant adverse effect on safety because it is consistent with CTS Amendment 166, dated June 19, 1996. <i>and TSTF 118.</i></p>	5.5.8.c.3 SR 3.0.2	NONE 4.9

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.10	4.5.A
A2	<p>The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change with no safety effect.</p> <p><i>are not needed to describe the requirements established in ITS 5.5.10</i></p>	5.5.10	4.5.A
A3	CTS specify the surveillance frequency for visual inspections of the Containment Air Filtration System and CR Air Filtration System, respectively. These specifications include the requirement to perform a visual inspection "every six months for the first two years." This requirement is not needed because the period of applicability has expired. This is an equivalent administrative change with no effect on safety.	NONE	4.5.A.4.a 4.5.A.5.a
A4	CTS specify testing requirements for the Containment Air Filtration System and the CR Air Filtration System, respectively. ITS keeps these requirements except that the systems are identified as Containment FCUs and the CR Ventilation System, respectively. This is an equivalent administrative change with no effect on safety.	5.5.10	4.5.A.4 4.5.A.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.11	4.1
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.5.11	4.1
A3	ITS include an explicit statement that allowances of ITS SR 3.0.3 apply to the testing and inspection frequencies specified in the Explosive Gas and Storage Tank Radioactivity Monitoring Program required by ITS 5.5.11. This is an equivalent administrative change with no safety effect since the equivalent allowance is already provided by CTS 4.1. Differences between ITS SR 3.0.3 and CTS 4.1 are explained and justified with ITS Section 3.0. This is an equivalent administrative change with no effect on safety.	5.5.11 SR 3.0.3 3.0	4.1
ITS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM			
	NONE		

ITS 5.5.11 includes the allowance that SR 3.0.2 applies and this is equivalent to the allowance provided by CTS definition 1.12.

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.13 - TS BASES CONTROL PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)			
	NONE		
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.15 SR 3.0.2	6.14 1.12
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.5.15 SR 3.0.2	6.14 1.12

CTS 6.14, Containment Leakage Rate Testing Program is incorporated into ITS as ITS 5.5.15

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS specify that CTS Definition 1.12 is not applicable to containment leakage rate testing. ITS maintain this allowance with the statement that SR 3.0.2 is not applicable because testing frequencies are established by 10 CFR 50, Appendix J. This is an equivalent administrative change with no effect on safety.	5.5.15 SR 3.0.2	6.14 1.12
A4	CTS specify that CTS 4.1 applies to containment leakage rate testing. ITS 5.5.15 maintains a similar allowance by stating that ITS 3.0.3 is applicable. ITS SR 3.0.3 allows a delay of the lesser of 24 hours or the specified SR frequency to perform a missed surveillance. The existing requirement in CTS 4.1 allows no delay in entering actions when an SR is missed for a component with an AOT > 24 hours. This is an equivalent administrative change.	5.5.15 SR 3.0.3 3.0 3.0.3	6.14 4.1
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.6	6.9.1.3
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.6	6.9.1.3

CTS requires a tabulation by job function of personnel exposures greater than 100 mrem/year. ITS maintains this requirement but clarifies that it includes only deep dose exposures.

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.7	6.12
A2	The CTS statements of objective and applicability were replaced and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS Limiting Condition of Operation (LCO) statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	5.7	6.12

CTS identifies duties and responsibilities using IP3 specific job titles. ITS was generic titles consistent with ANSI N18.1-1971 and/or Reg Guide 1.8, 1975.

Discussion of Change	Summary of Change ¹²	ITS	CTS
<p>M4</p>	<p>In Mode 2, ITS establish a new requirement to perform a COT within 4 hours after reducing power below the P-6 setpoint . In addition, ITS include a new requirement to perform a COT within 4 hours after reducing power below the P-10 setpoint. These changes ensure that the COT will verify function operability if the plant expects to stay critical, while allowing this SR to be skipped if shutdown will be completed promptly. Finally, when in Modes 3, 4 or 5 with CRD system capable of rod withdrawal and one or more rods not fully inserted, ITS establish a new requirement to perform a COT for ITS 3.3.1, Function 4, within 4 hours after entering Mode 3 from Mode 2 and every 92 days thereafter. This change is needed since the source range trip is the only RPS automatic protection function required in MODES 3, 4, and 5. This change is acceptable because it does not introduce any operation which is un-analyzed while prompt verification of the operability of the required IRM and SRM trip functions after entering the Applicable mode. This change has no adverse effect on safety.</p>	<p>SR 3.3.1.7 SR 3.3.1.8</p> <p>3.3.1 Function 3</p> <p>3.3.1 Function 4</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS	CTS
M7 ✓	<p>CTS do not include explicit requirements for Channel Calibration of the Power Range Neutron Flux, IRM Flux, or SRM Flux, respectively, although the trip setpoints are verified as part of the operational tests. ITS SR 3.3.1.11 is added to require a Channel Calibration of these trip functions every 24 months. For the power range detectors, Channel Calibration consists of both a normalization of the detectors based on a power calorimetric and a flux map performed above 15% RTP. For the source range and intermediate range neutron detectors, Channel Calibration consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. This change is acceptable because it does not introduce any operation which is un-analyzed while establishing an explicit requirement for periodic calibration of the source, intermediate and power range nuclear detectors.. Therefore, this change has no adverse effect on safety.</p>	SR 3.3.1.11	<p>Table 4.1-1 Item 1</p> <p>Table 4.1-1 Item 2</p> <p>Table 4.1-1 Item 3</p>
M8 ✓	Not used.		
M9	Not used.		

M9

ITS 3.3.1, Function 14, SG water level Low
 Coincident with Steam Flow/Feedwater Flow
 Mismatch is not required by CTS. The function
 is added to ITS because it provides a diverse
 trip, in conjunction with Function 13, in response
 to the loss of feedwater event.

3.3.1
 Function 14

N/A

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY			
M1	<p>CTS establish a surveillance Frequency for Isotopic Analysis for I-131, 133, and 135 as once per 14 days with a "maximum time between analyses" of 20 days. ITS also require verification of reactor coolant dose equivalent I-131 specific activity every 14 days, but the limit for the maximum time between analyses is based on ITS SR 3.0.2 which allows a 25% grace period.</p>	SR 3.0.2	Table 4.1-2
M2	<p>CTS specify that acceptance criteria for reactor coolant gross activity, a function of E(bar), is limited to "noble gases with half-lives greater than 10 minutes." This is consistent with CTS 1.14 which limits E(bar) to the noble gas E(bar). ITS are based on the ITS Definition, E(bar)-Average Disintegration Energy. The ITS and CTS definitions of E(bar) differ in that ITS include all reactor coolant isotopes, except Iodines, with half lives > 10 minutes, making up at least 95% of the total non-iodine coolant activity. This change is needed because the ITS definition requires counting contributions from isotopes other than noble gases.</p>	LCO 3.4.16 3.4.16.1	1.14
M3	<p>CTS require verification at least 5 days per week of "gross activity" and require verification every month of gross specific activity using a "Radiochemical (gamma) Spectral Check." The Radiochemical Spectral Check is equivalent to the gross specific activity defined in the ITS Bases. ITS require verification every 7 days of the gross specific activity. This change requires more frequent verification of the gross specific activity and eliminates the explicit requirement to verify gross activity at least 5 days per week.</p>	<p>Bases SR 3.4.16.1</p>	3.1.A.1.h.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER SYSTEM			
M1	ITS limits the time that the plant may be without the full complement of containment cooling and iodine removal capability, while the CTS does not limit the time.	LCO 3.6.6	3.3.B.2
M2	Moved to the L-Table. <i>OK, but similar item in 3.6.7 was moved to A-Table</i>		
M3	ITS SR 3.6.6.1 is added to require verification every 31 days that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position. There is no equivalent requirement in the CTS.	SR 3.6.6.1	None
M4	ITS SR 3.6.6.2 is added to require operation of each required containment fan cooler train for ≥ 15 minutes every 92 days. There is no equivalent requirement in the CTS.	SR 3.6.6.2	None
M5	ITS SR 3.6.6.3 is added to require verification every 92 days that cooling water flow to each FCU is ≥ 1400 gpm. There is no equivalent requirement in the CTS.	SR 3.6.6.3	None
M6	CTS 4.5.A.4.b.3 requires that charcoal filter isolation valves shall be tested to verify operability every 24 months. ITS SR 3.6.6.7 expands this surveillance to require verification that each FCU actuates and dampers re-position on receipt of an actual or simulated safety injection signal.	SR 3.6.6.7	4.5.A.4.b.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR			
<p>M1</p> <p><i>Entersy</i></p>	<p>CTS require weekly verification of DG fuel inventory. DG fuel inventory includes day tanks, storage tanks, and offsite reserves. ITS require verifying inventory in offsite reserves, but increase frequency from weekly to every 24 hours. This satisfies FSAR requirements for daily monitoring of offsite reserves. The FSAR specifies daily monitoring of the offsite reserve since the reserve is in tanks supporting gas turbine units not under Authority control. Although the 30,026 gallons fuel oil needed to support DG operability is designated for the exclusive use of IP3, the fact that the oil in the tanks is used for other purposes and consumption is not under direct IP3 control warrants frequent verification. This change is acceptable since it does not introduce any unanalyzed operation while requiring more conservative verification of inventory than currently required. In addition, this is consistent with FSAR monitoring requirements. This change has no significant adverse effect on safety.</p>	<p>3.8.1</p> <p>3.8.3</p> <p>SR 3.8.3.1</p>	<p>Table 4.1-3 Item 8</p>

(Also, see L.5)

3.8.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
<p>M2</p> <p><i>Entry</i> →</p>	<p>CTS have no requirements for fuel oil properties in neither the DG fuel oil storage tanks nor the offsite reserve, except that the reserve oil be compatible with the diesels. ITS require that important properties of fuel oil in both the storage tanks and the reserve be verified at the frequency and to the acceptance criteria specified in ITS. The reserve is maintained by Consolidated Edison Company (Con Ed), according to agreements with <u>the Authority</u>. The reserve is normally stored in the same tanks used for IP2 reserves. Fuel oil properties are controlled according to IP2 TS and FSAR to meet IP2 and IP3 operability requirements. Required testing of the <u>properties of reserve fuel</u> will be done by IP2 according to Con Ed programs. <u>The Authority</u> will verify that reserve fuel oil meets ITS requirements. This does not introduce any unanalyzed operation while establishing requirements for fuel oil acceptance criteria and verification. Thus, this change has no significant adverse safety effect.</p>	<p>3.8.3</p> <p>SR 3.8.3.3</p> <p>SR 3.8.3.4</p> <p>5.5.12</p>	<p>3.7</p> <p>4.6</p>
<p>M3</p>	<p>CTS do not establish requirements for a minimum DG air start receiver pressure. ITS add a new requirement to verify every 31 days that each DG air receiver is at the minimum pressure required to support at least four start attempts consistent with the requirements in the FSAR Section 8.2. This more restrictive change is acceptable because it does not introduce any operation which is unanalyzed while establishing more conservative requirements for verification of air start receiver pressure than is currently required. Therefore, this change has no negative effect on safety.</p>	<p>SR 3.8.3.5</p> <p>3.8.3</p>	<p>3.7</p> <p>4.6</p>

3.8.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3 *	<p>Above cold shutdown, CTS have RAs if the electrical distribution system is not restored to requirements within specified Completion Times (CTs). If the reactor is critical when requirements are unmet, then it must be in hot shutdown within 6 hours and cold shutdown within the following 30, but if it is subcritical when requirements are unmet, RCS temperature and pressure may not be increased more than 25 °F and 100 psi. Under these conditions, ITS require the reactor to be in Mode 3 in 6 hours and Mode 5 in 36 regardless of plant status. The CTS allowance is eliminated. This removes ambiguity created by CTS when performing reactor shutdown and cooldown required by CTS and ensures that the plant is outside LCO Applicability when LCO requirements are unmet. This change is acceptable since placing the plant outside LCO Applicability when LCO requirements are unmet is conservative and there is no change in the CTS 3.7.C.1 requirement. This has no significant adverse effect on safety.</p>	<p>3.8.4 RA C.1</p> <p>3.8.4 RA C.2</p>	<p>3.7.C</p> <p>3.7.C.1</p> <p>3.7.C.2</p>
M4	<p>CTS require that the voltage of each battery must be measured every month; however, acceptance criteria is not included in the Technical Specifications. ITS maintain this requirement; however, the explicit acceptance criteria for each battery is included in the Technical Specifications. This more restrictive change is acceptable because it does not introduce any unanalyzed operation while requiring periodic battery voltage acceptance criteria consistent with design requirements. Thus, this change has no significant adverse effect on safety.</p>	SR 3.8.4.1	4.6.B.1

* re m3: note that for two similar items in 3.6 (3.6.6 M2 and 3.6.7 M3), NRC reviewer moved one to L-Table and one to A-Table.

similar comment for 3.8.7 M3 and 3.8.9 M3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS			
M1	CTS require that at least one isolation valve be operable, locked closed, or blind flanged in each line penetrating the containment that provides a direct path from containment atmosphere to the outside; however, no explicit requirement exists to verify periodically that this requirement is met. ITS retains this requirement, and requires verification every 7 days.	SR 3.9.3.1 LCO 3.9.3.c LCO 3.9.3.e	3.8.A.2
M2	CTS require continuous monitoring of the subcritical core by two Source Range Monitors (SRMs) in Mode 6; however, no surveillance requirements exist for periodic calibration of SRMs during refueling. ITS require performance of an SRM channel calibration every 24 months.	SR 3.9.2.2	3.8.A.4
M3	CTS require one SRM if core geometry is not being changed; thus, one SRM is required during positive reactivity addition without core geometry change. ITS require 2 SRMs Operable in Mode 6 and suspending Core Alterations and positive reactivity additions if only one SRM is Operable. ITS require 2 SRMs during positive reactivity addition without core geometry change.	LCO 3.9.2	3.8.A.4

These are for 3.9.2; see next page for correct wording for 3.9.3

for 3.9.3

DOC	SUMMARY	ITS	CTS
M2	CTS and ITS require that the Containment Building Vent and Purge system be properly aligned if fuel is moved prior to a specified decay time. ITS adds a requirement for periodic verification.	SR 3.9.3.2	3.8.A.9
M3	CTS requires that the Containment Vent and Containment Purge systems be properly aligned if fuel is moved prior to a specified decay time. ITS maintains the requirement for the purge system but does not allow the vent system to be aligned for use during this period. ITS requires that the vent system be isolated.	LCO 3.9.3.e	3.8.A.9
M4	CTS and ITS require that at least one isolation valve be operable, locked closed or blind flanged in each line penetrating containment. ITS further requires that an "operable isolation valve" must be an automatic isolation valve.	3.9.3.c.1	3.8.A.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.4 - PROCEDURES			
M1	<p>CTS include a list of the activities identified in the TS for which written procedures must be established, implemented, and maintained. ITS specify that each program specified in ITS must be included in this list. Therefore, ITS add the following activities identified in the TS for which written procedures must be established, implemented, and maintained:</p> <ul style="list-style-type: none"> Primary Coolant Sources Outside Containment Post Accident Sampling Component Cyclic or Transient Limit Reactor Coolant Pump Flywheel Inspection Program Inservice Testing Program Steam Generator (SG) Tube Surveillance Program Ventilation Filter Testing Program (VFTP) Explosive Gas and Storage Tank Radioactivity Monitoring Diesel Fuel Oil Testing Program TS Bases Control Program Safety Function Determination Program (SFDP) Containment Leakage Rate Testing Program <p><i>most</i></p> <p>Although IP3 already established, implements, and maintains written procedures for each of these programs the addition of specific requirements to have written procedures for these programs is a more restrictive change with no significant adverse effect on safety.</p>	<p>5.4.1</p> <p>5.5</p> <p>5.5.2</p> <p>5.5.3</p> <p>5.5.5</p> <p>5.5.6</p> <p>5.5.7</p> <p>5.5.8</p> <p>5.5.10</p> <p>5.5.11</p> <p>5.5.12</p> <p>5.5.13</p> <p>5.5.14</p> <p>5.5.15</p>	6.8.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM			
M1	<p>There are no CTS or FSAR requirements for testing diesel fuel oil. ITS add a requirement that a diesel fuel oil testing program be maintained with specific TS requirements for acceptance criteria and testing frequency. Although there are no CTS requirements for testing diesel fuel oil, ITS are consistent with current practice except that ITS require more frequent testing of diesel fuel oil total particulate concentration and reduce testing of other parameters after the oil is placed in the storage tank. This is acceptable because ITS incorporate the current industry practice for diesel fuel oil testing. IP3 design and licensing basis require that each DG have an onsite underground storage tank containing oil for 48 hours of minimum safeguards load and a DG fuel oil reserve with sufficient fuel to support an additional 5 days of operation. ITS will establish a fuel oil testing program with sampling and testing requirements and acceptance criteria consistent with NUREG-1431. The program will address requirements for new fuel oil deliveries, fuel oil stored in the onsite DG fuel oil storage tanks, and the offsite reserve storage tanks. The addition of diesel fuel oil testing requirements to the TS is a more restrictive change which is acceptable because it does not introduce any operation which is unanalyzed, while requiring a more conservative approach to testing diesel fuel oil than is currently required. Therefore, this change has no significant adverse effect on safety.</p>	5.5.12	NONE

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.13 - TS BASES CONTROL PROGRAM			
M1	ITS establish TS requirements for licensee controlled changes to the ITS Bases. The addition of a TS Bases Control Program is a more restrictive change with no significant adverse effect on safety.	5.5.13	NONE
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)			
M1	ITS set TS requirements that ensure a loss of safety function resulting from support system inoperability is detected and appropriate actions are taken. The addition of a Safety Function Determination Program is a more restrictive change with no significant adverse safety effect.	5.5.14	NONE
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM			
	NONE		
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS			
M1	CTS include pressure temperature limit curves and low temperature overpressure protection system limits as part of the TS. ITS move these limits to a Pressure and Temperature Limits Report (PTLR) according to Generic Letter 96-03. Justification for maintaining operating limits in the PTLR versus the TS are addressed in the Discussion of Changes associated with the affected TS. Establishing specific requirements for the establishment and maintenance of a PTLR is a more restrictive change with no significant adverse effect on safety.	3.4	3.1

NONE

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L1 ✓	CTS define " Power Operation" as reactor power > 2% rated power (RTP). CTS LCOs applicable in Power Operation apply when reactor power is > 2% RTP. ITS define "Power Operation" as reactor power > 5% RTP. ITS LCOs applicable in Power Operation apply when reactor power is > 5% RTP. This change increases the power level used to go from Mode 2 to 1 from 2% to 5% RTP thus increasing the level at which Mode 1 LCOs apply.	Table 1.1-1	1.2.4	I
L2 ✓	CTS defines "Dose Equivalent I-131" as that concentration of I-131 that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 present. The thyroid dose conversion factors used for this calculation must be those listed in Table III of TID-14844. ITS keep this definition except that they specify that thyroid dose conversion factors from either of two other references are also acceptable.	1.1	1.15	II
L3 ✓	The CTS definition of " Instrument Channel Functional Test" requires injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating actions. The equivalent ITS Definition, "Channel Operation Test," keeps this requirement but allows an actual or simulated signal to verify that a channel is Operable.	1.1	1.9.2	VI II

→ add L.4

The CTS definition of Instrument Channel Functional Test is clarified in ITS regarding where the test signal is injected and which components are not subject to the operability requirement.

Indian Point - Unit 3

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Section 1

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION				
L1	Not used. This change adds a completion time for the RA that addresses inoperable rod position indicators	LCO 3.1.7	3.10.6.1	III
L2	This change adds RA for a condition involving an inoperable demand position indicator.	3.1.7	3.10.6	IV
ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2				
	NONE			

L3

This change establishes RA's for more than one IRPI per group inoperable per TSTF 234

LCO 3.1.7 3.10.6.2

V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.3 - INSTRUMENTATION

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION				
L1	<p>CTS trip setpoint limiting safety system settings are based on the IP3 Plant Manual. ITS will use relaxed allowable values calculated using Regulatory Guide 1.105, and ISA-RP67.04. This change has no significant adverse safety effect since the existing limiting safety system settings and the proposed allowable values used the information and methods available at the time to determine instrument settings that ensure that safety limits are not exceeded during any event.</p>	3.3.1	3.5	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
<p>L5</p> <p>92</p>	<p>CTS require that the monthly calibration of the power range channels include a comparison of the upper and lower axial offset using the incore detectors. ITS keep the requirement to compare results of the incore detector measurements to NIS AFD, but extend the frequency from once per month to every 31 EFPDs. In addition, CTS require a calibration of the excore channels to the incore channels every month. ITS keep the requirement to calibrate the excore channels to the incore channels, but extend the frequency from once per month to every 31 EFPDs. The SR frequency is changed to a function of core exposure with an interval consistent with the current SR frequency if the plant is operated at full power during the SR interval. Operating experience indicates that this frequency is sufficient to compensate for the slow changes in neutron flux patterns during this interval. These SRs are not intended to detect flux tilts that occur quickly for which there are other indications of abnormality that prompt a verification of core power tilt. Therefore, this change has no adverse safety effect.</p>	<p>SR 3.3.1.3</p> <p>SR 3.3.1.6</p>	<p>Table 4.1-1 Item 1 Note * Remark 3</p>	<p>II</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION				
L1	<p>CTS trip setpoints limiting safety system settings are based on the Plant Manual. ITS uses relaxed allowable values calculated according to the Engineering Standards Manual. The limiting safety system settings established by the Plant Manual are based on information available at the time regarding instrument performance and methods available at the time for calculating setpoints. The allowable values calculated according to the Engineering Standards Manual ensure that sufficient allowance exists between actual setpoint and the analytical limit to account for known instrument uncertainties. This ensures that the analytical limit will not be exceeded if the allowable value is satisfied. This change has no significant adverse safety effect since the existing limiting safety system setting and the proposed allowable values used the information and methods available at the time to determine instrument settings that ensure that safety limits are not exceeded during any event.</p>	3.3.5	None	V

L1

NOT USED

(based on IPN-00-056)
 reply to MRC letter
 dated 8/17/00

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS specify the following actions when requirements for undervoltage or degraded voltage are unmet: if the 138kV and 13.8kV sources of offsite power are available and the conditions of column 3 or 4 cannot be met within 72 hours, then the requirements of 3.7.C.1 or 2 shall be met. CTS 3.7.C.1 and 3.7.C.2 are the actions taken after the AOT for an inoperable DG has expired. Thus, these CTS statements are equivalent to requiring shutdown in 72 hours. In ITS, a one-hour CT is provided for RAs that can be taken prior to declaring the associated DG inoperable, which then requires a plant shutdown in 72 hours. This is a less restrictive change since ITS allow 73 hours to reach the same plant condition that must be reached in 72 hours under CTS. The 6-hour AOT in Condition A of the NUREG does not apply since the IP3 design is not covered by WCAP 10271. This less restrictive change has no significant adverse safety effect since there is only a slight increase in time from 72 to 73 hours.</p>	<p>3.3.5 Condition A</p> <p>3.3.5 Condition B</p>	<p>Table 3.5-3 Note 1</p> <p>3.7.C.1</p> <p>3.7.C.2</p>	III

add L1 for 3.3.6 "Pressure Relief Isolation Instrumentation"
see next page

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

DOC	SUMMARY OF CHANGE	ITS Section	CTS Section	Category
	ITS SPECIFICATION 3.3.6 - Containment Purge and Pressure Relief Isolation Instrumentation			
L1	<p>CTS requires testing of isolation instrumentation within 100 hours prior to refueling. ITS modifies test frequency to be 92 days for COT and every 24 months for TADOT. This change is needed so that ITS is consistent with STS by specifying a surveillance interval rather than specifying an event (refueling).</p> <p>ITS SR 3.0.4 ensures that the required surveillance is performed prior to entering the applicable mode or condition.</p>	SR 3.3.6.3 SR 3.3.6.4	3.8.A-8	II

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED				
L1	ITS adds an allowance to the requirements for decay heat removal in Mode 5 when RCS loops are not filled. Note 2 allows 1 RHR loop to be inoperable 2 hours if the other loop is operable and in operation.	LCO 3.4.8 Note 2	None	V
ITS SPECIFICATION 3.4.9 - PRESSURIZER				
L1	ITS add an allowance to the requirements for decay heat removal in Mode 5 when RCS loops are not filled. ITS allow 1 RHR loop to be inoperable two hours if the other loop is operable and in operation.	LCO 3.4.8 Note 2	None	V
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES				
L1	CTS require normal water level be established in the pressurizer prior to reactor criticality. ITS require that pressurizer water level be $\leq 58.3\%$ in Modes 1, 2, and 3.	LCO 3.4.9	3.1.C.4	I

for 3.4.9

for 3.4.10

L1	CTS requires pressurizer safety valves to be operable above CSD. ITS eliminates operability in mode 4 when LTOP provides overpressure protection.	LCO 3.4.10	3.1.A.2.b	V
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Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

3.6.6

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
<p>M.2</p>	<p>CTS 3.3.B.3 establishes the Actions required if either containment spray and/or containment fan cooler trains are not restored to meet CTS requirements within specified completion times CTS 3.3.B.2. CTS 3.3.B.3.a specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown (Mode 3) within 4 hours and cold shutdown (Mode 5) within the following 24 hours. However, if the reactor is subcritical when requirements are not met, CTS 3.3.B.3.b requires only that reactor coolant system temperature and pressure not be increased more than 25°F and 100 psi, respectively, over existing values with the requirement to proceed to cold shutdown (Mode 5) deferred by 48 hours. The CTS markup shows CTS 3.3.B.3.b as being deleted. The deletion is justified as a more restrictive change and states that under the same condition stated above, ITS 3.6.6 Required Actions B.1 and B.2 and/or Required Actions E.1 and E.2, require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours (Required Action B.2, and E.2) regardless of the status of the unit when the condition is identified. The allowance of 48 hours provided in CTS 3.3.B.3.b is deleted. This justification is not entirely correct. The statement implies that if either a spray train and/or one or two containment fan coolers is determined to be inoperable while in Mode 3, then an immediate shutdown is commenced such that Mode 5 is reached within 84 hours. The CTS for this type of condition would allow 24 hours to restore the systems to Operable status before entering CTS 3.3.B.3 where an additional 48 hours would be allowed before shutting down to Mode 5. In the ITS for this condition, ITS Actions A, C, and/or D would be entered first. If the systems could not be restored to Operable status within the specified Completion Time of these Actions, then ITS 3.6.6 Action B and/or E would be entered. Under this scenario the changes associated with CTS 3.3.B.3.b would be an Administrative change for the Containment</p>	<p>3.6.6 Actions</p>	<p>3.3.B.3 3.3.B.3.a 3.3.B.3.b</p>	<p>III, IV</p>

Change to L-10?
moved from M.2 by NRC reviewer?

Under this scenario the changes associated with CTS 3.3.B.3.b would be an Administrative change for the Containment

Indian Point - Unit 3

L-8

Section 3.6

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

→ "Admin change" ?

Note that similar item for 3.6.7 was moved to A-Table

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM				
L1	<p>CTS establishes requirements for the Spray Additive System. CTS specifies that any valve required for the functioning of the system during and following an accident may be inoperable provided it is restored within 24 hours and all valves in the system that provide the duplicate function are Operable. If the requirements of CTS 3.3.B.1.a are not met for any other reason, then CTS 3.3.B.3 requires initiation of a plant shutdown because no other AOT is specified. Under the same conditions, ITS provides an AOT of 72 hours for an inoperable Spray Additive System before a reactor shutdown is required. See <u>DOC M.3 in A-Table</u> for additional justifications with regards to this change.</p> <p><i>remember as A.7?</i></p>	3.6.7 RA A.1	3.3.B.1.a 3.3.B.2.c 3.3.B.3	III
L2	<p>CTS establishes the Actions required if either CS and/or containment fan cooler trains are not restored to meet CTS requirements within specified completion times. CTS specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown within 4 hours and cold shutdown within the following 24 hours. Under the same conditions, ITS require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours. See <u>DOC M.3 in A-Table</u> for additional justifications with regard to this change.</p> <p><i>remember as A.7?</i></p>	3.6.7 RA B.1 3.6.7 RA B.2	3.3.B.3 3.3.B.3.a	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

3.7.5

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	CTS require each AFW pump be started periodically, specify the test acceptance criteria that each pump starts and reaches the required developed head and requires verification that each AFW pump will start as designated automatically when SG pressure is \geq 600 psig. The ITS allowance permitting deferral of SRs is an explicit recognition that the SRs cannot be initiated until minimum plant conditions are established and that some time is required to perform this test once conditions are established.	3.7.5	4.8.1.a 4.8.2 4.8.3.b	II
L3	CTS require verification that each AFW pump establish full flow to each SG every 24 months. ITS keep the requirement to verify the developed head of each AFW pump at the flow test point is \geq the required developed head at a frequency specified by the Inservice Test Program, but not the requirement to verify full flow to each SG every 24 months.	3.7.5 SR 3.7.5.2	4.8.1.a	II
A8	CTS require that the verification that each AFW pump will start automatically upon receipt of an AFW actuation test signal. ITS maintain this requirement with the allowance that the test may be initiated by either an actual or simulated actuation signal.	3.7.5.2	4.8.3.b	II

renumber as L4?

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.15 - SPENT FUEL PIT BORON CONCENTRATION				
L1	CTS specify the Applicability of requirements for spent fuel pit boron concentration as during periods of spent fuel movement in the spent fuel pit. CTS also requires monthly verification of boron concentration "when fuel stored" in the spent fuel pit. ITS specifies that spent fuel pit boron concentration limits must be met "When fuel assemblies are stored in the fuel storage pit and a spent fuel pit verification has not been performed since the last movement of fuel assemblies in the fuel storage pit.	3.7.15 Applicability	3.8.C.3 Table 4.1-2 5.4.3	I
ITS SPECIFICATION 3.7.16 - SPENT FUEL ASSEMBLY STORAGE				
	None			
L1	CTS specify the Applicability of requirements for spent fuel pit boron concentration as during periods of spent fuel movement in the spent fuel pit. CTS also requires monthly verification of boron concentration when fuel is stored in the spent fuel pit. ITS specifies that spent fuel pit boron concentration limits must be met when fuel assemblies are stored in the fuel storage pit and a spent fuel pit verification has not been performed since the last movement of fuel assemblies in the fuel storage pit.	3.7.15 Applicability	3.8.C.3 Table 4.1-2 5.4.3	I

*this is a duplicate
of 3.7.15 L1.
There are no L-DOLs
for 3.7.16*

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS require that a component with an Inoperable offsite power source or DG power source be declared inoperable immediately if its redundant component is inoperable for any reason other than inoperable power source. CTS also say that if a DG is inoperable, then the ESF associated with the remaining DG buses must be operable. This ensures that failure of the remaining operable power source does not cause loss of safety function since the redundant component is inoperable for reasons other than inoperable power supply. ITS have the same requirement to declare required features supported by the inoperable AC source inoperable when the required redundant feature is inoperable, but ITS delay implementing this requirement 24 hours with one inoperable offsite circuit, 4 hours with one inoperable DG, and 12 hours with both offsite circuits inoperable to allow time for evaluation and repair.</p>	<p>3.8.1 RA A.3</p> <p>3.8.1 RA B.2</p> <p>3.8.1 RA C.1</p>	<p>3.7.G</p> <p>3.7.B.1</p>	III
L3	<p>CTS 3.7.B.1 requires that the Operable DGs must be tested within 24 hours whenever a DG is declared inoperable for any reason other than preplanned maintenance or testing (based on the presumption there is no need to suspect common mode DG failure when the DG is inoperable for these reasons). ITS 3.8.1, Required Actions B.3.1 and B.3.2, maintain the same requirement; however, ITS 3.8.1, Required Actions B.3.1 and B.3.2, allows omitting testing of the Operable DGs even if the DG is inoperable for reasons other than preplanned maintenance or testing if it can be determined that the cause of the DG's inoperability does not exist on the Operable DGs. This change is needed because it eliminates unnecessary testing consistent with the recommendations of Generic Letter 84-15. This change has no significant adverse impact on safety and is acceptable.</p>	<p>3.8.1 RA B.3.1</p> <p>3.8.1 RA B.3.2</p>	3.7.B.1	

Not used, superseded by Amendment 187

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS include requirements for periodic testing and surveillance of the AC power sources, specifically the diesel generators, and these requirements apply in all Modes. ITS keep the same requirement by requiring that all SRs must be met when ITS 3.8.2 applies, but ITS SR 3.8.2.1 includes the allowance that, although all of the ITS 3.8.1 SRs must be met. ITS SR 3.8.2.1 does not require performance of the following SRs: SR 3.8.1.3; SR 3.8.1.8; SR 3.8.1.9; SR 3.8.1.10; SR 3.8.1.11; SR 3.8.1.12; and SR 3.8.1.13.</p> <p>ITS modifies this requirement by identifying certain surveillances that are not required to be met in Modes 5 and 6 and certain surveillances that are not required to be performed in Modes 5 and 6.</p>	<p>SR 3.8.2.1</p> <p>3.8.1 SRs</p> <p>3.8.2</p> <p>SR 3.8.1.3</p> <p>SR 3.8.1.8</p> <p>SR 3.8.1.9</p> <p>SR 3.8.1.10</p> <p>SR 3.8.1.11</p> <p>SR 3.8.1.12</p> <p>SR 3.8.1.13</p>	4.6.A	II

Per Row 1a
(IPW-00-085)

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L5	CTS 3.7.A.5 requires that an additional 30026 gallons of fuel oil be available when above cold shutdown. ITS 3.8.3. maintains the requirement for additional fuel oil volume in storage on site with the identical two differences stated above in L4, to change to usable volume and using a revised calculation listed in RG 1.137 Item C.2.c(2). ↑			
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING				
L1	CTS require batteries 31, 32, and 33 and chargers 31, 32, and 33 to be operable. CTS specify RAs for an inoperable battery with a stipulation that the associated battery charger must be operable during the two hour AOT for a battery. No action is specified for an inoperable battery charger; thus, CTS requires that the plant be shut down immediately if a charger becomes inoperable. Under the same conditions, ITS allow 2 hours to restore an inoperable battery and/or charger. Thus, this change extends the AOT for a charger to 2 hours. The 2 hour AOT for a battery charger is based on Regulatory Guide 1.93 and reflects a reasonable time to assess unit status as a function of the inoperable battery or charger and provides a reasonable time to initiate an orderly and safe unit shutdown if DC electrical power subsystem is not restored. Therefore, this change does not have a significant adverse effect on safety.	LCO 3.8.4 Condition B	3.7.A.6 3.7.B.4	III

The resulting usable oil volume to be required by ITS is 26,826 gallons.

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.9.2 NUCLEAR INSTRUMENTATION				
	NONE			
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS				
L1	CTS require that the Containment Building Vent and Purge System, including radiation monitors that initiate isolation, must be tested and verified to be operable within 100 hours prior to refueling operations. ITS maintains the requirement for periodic verification that each required containment purge and exhaust valve actuates to the isolation position on an actual or simulated actuation signal; however, the SR Frequency is extended from within 100 hours prior to refueling operations to once every 92 days.	SR 3.9.3.3	3.8.A.8	II
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION -- HIGH WATER LEVEL				
	NONE.			

add 3.9.3, L2, see next page

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Summary FOR 3.9.3 DOC L.2
 DOC
 Summary
 ITS
 CTS
 CATEGORY

L2
 CTS requires containment closure during
 3.8.A.1
 3.8.A.2
 I

handling operators, reactor vessel (RV)
 head removal/installation, and movement
 of heavy loads over the open RV.
 ITS maintains containment closure during

"handling operators" (Doc A3) but does
 not specify closure during the other
 periods of applicability. Control over
 RV head removal/installation and movement

of heavy loads are maintained by the
 implementations of NUREG-0612 requirements

Supporting Doc & NSNE
 are on following pages

DISCUSSION OF CHANGES
ITS SECTION 3.9.3 - CONTAINMENT PENETRATIONS

provide assurance that this potential pathway for releases to the environment is closed in the event of a fuel handling accident.

LESS RESTRICTIVE

- L.1 CTS 3.8.A.8 requires that the Containment Building Vent and Purge System, including radiation monitors that initiate isolation, must be tested and verified to be operable within 100 hours prior to refueling operations. ITS SR 3.9.3.3 maintains the requirement for periodic verification that each required containment purge and exhaust valve actuates to the isolation position on an actual or simulated actuation signal; however, the SR Frequency is extended from within 100 hours prior to refueling operations to once every 92 days. This change is needed because it eliminates an ambiguity that could be interpreted as requiring the performance this SR every time refueling activities are started and stopped during a single refueling outage. This change is acceptable because the requirement that the Containment Building Vent and Purge isolation function is Operable during fuel movement and Core Alterations is unchanged. Elimination of the requirement to perform this verification within 100 hours prior to an activity is not significant because the normal periodic Surveillance Frequency is established to provide adequate assurance that requirements are being met. The 92-day Frequency ensures that the SR is performed at the start of each refueling and this Frequency is sufficient to provide a high degree of assurance that the valves will function as required throughout a refueling outage. Therefore, this change has no adverse impact on safety.
- L.2 CTS 3.8.A.1 and 3.8.A.2 address containment closure requirements, including the equipment door, personnel air locks, and containment penetrations. The applicability for this specification is: 'during handling operations, reactor vessel (RV) head removal / installation, and movement of heavy loads over the RV with the head removed. ITS maintains containment closure requirements in ITS 3.9.3 during core alteration and movement of irradiated fuel. The ITS applicability is equivalent to CTS 'during handling operations' (DOC A.3). However the containment closure requirements for the other CTS periods of applicability are not retained in ITS. The purpose of establishing containment closure is to restrict the release of radioactivity to the environment in the event of a fuel handling accident. This change is acceptable because a fuel handling accident is not a credible event when

DISCUSSION OF CHANGES
ITS SECTION 3.9.3 - CONTAINMENT PENETRATIONS

fuel handling activities are not being conducted. At IP3, restrictions governing heavy loads were established in accordance with unnumbered generic letter dated December 22, 1980, "Control of Heavy Loads." This generic letter requested that licensees implement the heavy load control guidelines of NUREG-0612, including establishing safe load paths, crane design and inspection requirements, operator training, and procedures. In addition, the IP3 FSAR contains a structural evaluation of the reactor vessel for impact loadings resulting from dropping the RV head. This change has no adverse impact on safety because ITS maintains containment closure requirements for times when the potential exists for a fuel handling accident, while controls for movement of heavy loads, including the RV head, are implemented in accordance with NUREG-0612.

REMOVED DETAIL

None

NO SIGNIFICANT HAZARDS EVALUATION
ITS SECTION 3.9.3 - CONTAINMENT PENETRATIONS

LESS RESTRICTIVE
("L.2" Labeled Comments/Discussions)

Entergy has evaluated the proposed Technical Specification change identified as "Less Restrictive" in accordance with the criteria set forth in 10 CFR 50.92, and has determined that the proposed change does not involve a significant hazards consideration. The bases for the determination that the proposed change does not involve a significant hazards consideration are discussed below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

CTS 3.8.A.1 and 3.8.A.2 address containment closure requirements during handling operations, reactor vessel head removal / installation, and movement of heavy loads over the reactor vessel with the head removed. ITS 3.9.3 maintains closure requirements during handling operations (e.g., during Core Alterations and during movement of irradiated fuel assemblies within containment) to protect against the release of radioactivity to the environment in the event of a fuel handling accident. ITS does not maintain closure requirements during the other times specified in CTS. This does not involve a significant change in the probability of an accident previously evaluated because the status of containment closure is not a precursor to the fuel handling accident. This change also does not involve a significant increase in the consequences of an accident previously evaluated because ITS will maintain containment closure requirements during those times when a fuel handling accident is a credible event.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The change does not involve any new plant equipment, setpoints, or methods of operation that could create the possibility of a new or different kind of accident. Controls over installation and removal of the reactor vessel head and movement of heavy loads over the open reactor vessel will continue to be maintained in accordance with NUREG-0612 requirements as implemented at IP3.

NO SIGNIFICANT HAZARDS EVALUATION
ITS SECTION 3.9.3 - CONTAINMENT PENETRATIONS

3. Does this change involve a significant reduction in a margin of safety?

This change does not involve a significant reduction in a margin of safety because ITS will maintain the containment closure requirements during those periods of applicability when mitigation of the postulated fuel handling accident is needed. During the other periods of applicability, a fuel handling accident is not a credible event and therefore there is no safety margin reduction pertaining to this change. Also, the postulated drop of the reactor vessel head, as evaluated in the IP3 FSAR, is not affected by this change in applicability for containment closure requirements.

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA				
L1	<p>CTS specify that health physics personnel shall be exempt from the Radiation Work Permit (RWP) issuance requirements for entries into high radiation areas during performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. ITS expand this allowance to include personnel continuously escorted by health physics personnel provided they are otherwise following plant radiation protection procedures for entry into high radiation areas. Having a health physics person with a group in a high radiation area continuously provides the group with the ability to identify and respond to radiological situations that is equal to or better than the ability of a group without a health physics person working under the requirements established by a RWP. Thus, this change has no significant adverse effect on personnel safety.</p>	<p>5.7.1 5.7.1.c</p>	<p>6.12.1 footnote*</p>	<p>V</p>
L2	<p>CTS does not contain alternative methods for access control in radiation areas > 1000 mrem/hr. ITS adopts the alternative methods of access control (direct or remote surveillance) as described in NUREG-1431</p>	<p>5.7.2 5.7.3</p>	<p>6.12</p>	<p>II</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

DOC	CTS	Destination Document	Description	Control	Change Type
LA1	6.7.1.a 6.7.1.b 6.7.1.c 6.7.1.d	N/A	CTS specify that operation following a SL violation may be resumed in accordance with 10 CFR 50.36(c)(1)(i). In addition, CTS set requirements for reporting SL violations both within the <u>New York Power Authority (NYPA)</u> and to the NRC. ITS do not specify the internal or external reporting requirements created by a SL violation. In addition, ITS do not specify that 10 CFR 50 requirements govern reactor startup following a SL violation.	10 CFR 50.36(c)(1)(i)	4

✓
RO

X
Global Search
NYPA = Entersy

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS					
LA1	3.10.7.3	3.1.4 BASES	The CTS and ITS sections address the need for a re-evaluation of safety analyses in the case of plant operation for more than 5 days with a misaligned rod. This change relocates details regarding the required aspects of the analyses to the Bases.	ITS 5.5.13	2
LA2	3.10.9 Tble 4.1-1	FSAR	CTS requirements regarding the rod position deviation monitor are relocated to the FSAR.	10 CFR 50.59	2
ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS					
			NONE.		
ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS					
			NONE.		
ITS SECTION 3.1.7 - ROD POSITION INDICATION					
			NONE.		

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 Rev 3
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Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$)					
LA1	3.10.2.1	COLR	The $F_Q(Z)$ relationships and specific values as well as the requirements for power distribution mapping and computing $F_Q(Z)$ provided in the CTS are moved to the COLR.	5.6.5	3
LA2	A10 (moved from A10)	N/A	CTS specify that any event requiring plant shutdown on trip setpoint reduction because of Specification 3.10 shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS. Thus, this is an equivalent administrative change.	10 CFR 50.72 10 CFR 50.723 73	4
ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^N$)					
LA1	3.10.2.1	COLR	The information in CTS concerning $F_{\Delta H}^N$ calculation and measurement uncertainty compensation as well as the use of the movable incore detectors to create a power distribution map are moved to the COLR.	5.6.5	3

LA2 3.10.11 N/A see word, from 3.2.2, A.7 10 CFR 50.72 10 CFR 50.73 4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)					
LA1	3.10.2 3.10.2.6.1	COLR	The requirement for maintaining AFD within the target band within the target flux difference is moved to the COLR.	5.6.5	3
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)					
LA1	3.10.3.4	TRM	The requirement for the tilt deviation alarm in ensuring the QPTR limits are met is moved to the TRM.	50.59	3
LA2	3.10.2.9	BASES	The details for the use of incore detectors to determine QPTR are relocated to the Bases.	5.5.13	3

LA3 3.10.11 N/A See words from A.8 10 CFR 50.72 10 CFR 50.73 4

Indian Point - Unit 3

LA-2

Section 3.2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION					
LA1	3.5 Table 3.5-2	ITS Bases 3.3.1 FSAR Table 7.2-1 FSAR Section 7.2	CTS identify the number of channels and the channels required to trip for each RPS and ESFAS Function. ITS LCO 3.3.1, 3.3.2, 3.3.3, 3.3.5, and 3.3.6 require that these functions be operable but do not provide system design details. This change allows the description of the design of instrument functions to be in the FSAR and the detailed description of the requirements for operability of these functions to be maintained in the ITS Bases.	10 CFR 50.59 ITS 5.5.13	1
LA2	Table 4.1-1	ITS Bases 3.3.1	CTS include Remarks and Notes not related directly to operability of any RPS or ESFAS function. ITS set clear operability and testing requirements for each RPS and ESFAS function in a format not requiring Notes or Remarks. This information can be defined and controlled in ITS Bases. This provides effective regulatory and change control. Safety is unaffected since there is no change in the requirement to keep the instrumentation operable.	ITS 5.5.13	2

Indian Point - Unit 3

LA-1

Section 3.3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION					
LA1	Table 3.5-3 Table 3.5-4	ITS Bases 3.3.2 FSAR Table 7.a-1	CTS identify number of channels and channels required to trip for each RPS and ESFAS Function. ITS LCO 3.3.1- 3.3.6 require these functions operable but do not provide system design details. This change, which allows the description of the design of instrument functions to stay in the FSAR and detailed description of operability requirements for these functions to be in ITS Bases, is consistent with NUREG-1431 for all LCOs. IP3 programs that implement FSAR changes according to 10 CFR 50.59 and ITS Bases changes according to ITS 5.5.13 require periodic submittal of FSAR and Bases changes to the NRC for review. This is a less restrictive administrative change with no safety effect since no requirements are deleted, and change control and regulatory oversight are maintained for relocated information.	10 CFR 50.59 ITS 5.5.13	1

Indian Point - Unit 3

LA-2

Section 3.3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA1	Table 3.5-3	ITS Bases 3.3.5 FSAR Section 7.2 FSAR Section 8.2	CTS identify number of channels and channels required to trip for each RPS and ESFAS function. ITS LCO 3.3.1 through 3.3.6 require that these functions be operable but do not give design details. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and appropriate change control and regulatory oversight are maintained for relocated information.	10 CFR 50.59 ITS 5.5.13	1
LA2	Table 3.5-1 Note**	FSAR Section 8.5 ITS Bases 3.3.5	CTS have no time delay requirements for the 480V Bus undervoltage relay since the undervoltage protection devices used to start DGs are induction disc relays; thus, time to trip decreases as a function of voltage decrease below setpoint. This detail is not in ITS 3.3.5, but is relocated. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and change control and oversight are maintained for the information being relocated.	10 CFR 50.59 ITS 5.5.13	1

Indian Point - Unit 3

LA-7

Section 3.3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION					
LA1	3.5 Table 3.5-2 Table 3.5-3 Table 3.5-4	ITS Bases 3.3.6 <i>FSAR</i>	<i>this</i> CTS identify number of channels and channels required to trip for <i>each RPS and ESFAS</i> Function. ITS LCO 3.3.1, 3.3.2, 3.3.3, 3.3.5, and 3.3.6 require these functions be operable but do not provide system design details. This is a less restrictive administrative change with no safety effect since no TS requirements are deleted, and appropriate change control and oversight are kept for information relocated out of TS.	10 CFR 50.59 ITS 5.5.13	1

None for 3.3.7 & 3.3.8 ✓ OK

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS					
		None			
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY					
		None			
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS					
LA1	3.1.b 4.3	LCO 3.4.3 Bases	CTS include information such as: the information that limits must be recalculated periodically; the clarification that heatup and cooldown rates are based on the average temperature over a one hour period; and, requirements for vessel specimen removal. These details are not retained in the ITS and are relocated.	ITS 5.6.6 ITS 5.5.13	3
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2					
		NONE			

Indian Point - Unit 3

LA-1

Section 3.4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3					
		NONE.			
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4					
LA1	3.3.A.6	ITS 3.4.6 Bases FSAR	CTS have decay heat removal requirements that include a list of principal components in the decay heat removal loop such as heat exchangers, piping, and valves. ITS has requirements for either RCS loops or RHR loops. The details about what constitutes an operable loop are moved to the Bases of ITS 3.4.6. In addition, IP3 programs that implement FSAR changes in accordance with 10 CFR 50.59 and ITS Bases changes in accordance with ITS 5.5.13 require periodic submittal of changes to the NRC.	10 CFR 50.59 ITS 5.5.13	1
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED					
LA1	3.3.A.7	ITS 3.4.7 Bases FSAR	CTS have requirements for decay heat removal using RHR pumps in Mode 5 that include a listing of the principal components in the decay heat removal loop. ITS set requirements for RHR loops except that the details about what constitutes an operable loop are moved to the Bases of ITS 3.4.7.	10 CFR 50.59 ITS 5.5.13	1

Indian Point - Unit 3

LA-2

Section 3.4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED					
LA1	3.3.A.7	ITS 3.4.8 Bases	<p>CTS sets requirements for decay heat removal using RHR pumps in Mode 5 that include a list of principle components in the decay heat removal loop. ITS LCO 3.4.8 also sets requirements for RHR loops, but the details about what constitutes an operable loop are moved to the Bases of ITS 3.4.8. In addition programs that implement FSAR changes in accordance with 10 CFR 50.59 and ITS Bases changes in accordance with ITS 5.5.13 require periodic submittal of FSAR and Bases changes to the NRC for review.</p>	<p>10 CFR 50.59 ITS 5.5.13</p>	1
ITS SPECIFICATION 3.4.9 - PRESSURIZER					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES					
LA1	3.1.A.2	FSAR TRM	CTS require at least one operable pressurizer code safety valve or an opening \geq the size of one code safety valve flange whenever the reactor head is on the vessel. ITS keep this requirement in Modes 1, 2, and 3, and in Mode 4 when above the Low Temperature Overpressure Protection (LTOP) arming temperature; however, ITS do not include any requirements for pressurizer code safety valves below the LTOP arming temperature. When below the LTOP arming temperature, requirements needed to satisfy ASME Code for at least one pressurizer code safety valve or an opening \geq the size of one code safety valve flange will be maintained in the FSAR.	10 CFR 50.59	2
LA2	Table 4.1-3	IST Program	CTS require verification of setpoints every 24 months. ITS keep the requirement to verify the operability of pressurizer safety valves including setpoint verification; however, the frequency is specified as in accordance with the Inservice Test (IST) Program. The IST program requires that pressurizer safety valves be tested every 24 months.	ITS 5.5.7 10 CFR 50.55a(f)	3
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)					
		None			

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)					
LA1		Not used			
LA2	Table 3.5-3, Item 5	ITS 3.4.12 Bases FSAR	Three RCS pressure channels and three RCS temperature channels support OPS operability. For both functions, two channels are needed to actuate; so, CTS require two operable channels and a minimum degree of redundancy of 1. ITS 3.4.12 requires OPS operability, but pressure and temperature channel requirements are moved to ITS Bases. ITS Bases specify that OPS is operable for LTOP when three RCS pressure channels and three RCS temperature channels are operable and when an inoperable pressure or temperature channel is tripped. <u>Allowing the logic description to be in the FSAR and operability requirements in ITS Bases, is consistent with NUREG-1431. It is acceptable since 10 CFR 50.59 and ITS 5.5.13 ensure that FSAR and ITS Bases changes do not change TS, result in significant increases in probability or consequences of accidents, create new or different accidents, or result in significant safety margin reduction.</u>	10 CFR 50.59 ITS 5.5.13	3

Indian Point - Unit 3

LA-5

Section 3.4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	3.3.A.10	ITS LCO 3.4.12 Bases	<p>If RCS vent size and pressurizer level restrictions are met, CTS allow two HHSI pumps to be able to inject into RCS when RCS is < 319 °F and/or RHR is not isolated. The level restriction requires indicated level to be 0% with an allowance that alternate methods and instrumentation may confirm actual RCS elevation. ITS keep CTS allowances and let two HHSI pumps be aligned to RCS and energized if RCS vent and pressurizer level restrictions are met; but the information that indicated level may be used and the allowance that alternate methods and instrumentation may be used to confirm actual RCS elevation are in ITS Bases. This is acceptable since ITS require level \leq 0% as a condition to have HHSI pumps able to inject into RCS. Information on verifying level is a design issue more appropriately controlled in ITS Bases. This is acceptable since 10 CFR 50.59 and ITS 5.5.13 ensure that ITS Bases changes do not cause TS changes, result in significant increases in probability or consequences of accidents previously evaluated, create possibility of new or different accidents, or result in significant safety margin reduction. Also, programs implementing ITS Bases changes according to ITS 5.5.13 require NRC submittal. This is a less restrictive administrative change with no safety effect since no TS are deleted and appropriate change control and oversight level are kept.</p>	<p>10 CFR 50.59</p> <p>5.5.13</p>	3
LA4	3.1.A.8 3.1.A.8.c.2	TRM	CTS specify requirements for the Overpressure Protection System (OPS) or an RCS vent when the RCS temperature is < 319 °F.	<p>10 CFR 50 APPENDIX G</p>	3

10 CFR 50.59

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE					
			NONE		
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE					
LA1	4.5.B.2.c 4.5.B.2.d	FSAR	CTS list PIVs requiring leak tests. ITS keep the requirement to test PIVs currently listed in CTS, but the list of PIVs under ITS is in the FSAR. Keeping the list of PIVs to be tested under ITS in the FSAR is acceptable since 10 CFR 50.59 ensures that FSAR changes do not cause TS changes, significant increases in probability or consequences of accidents previously evaluated, possibility of new or different accidents, or significant safety margin reduction. In addition, IP3 programs implementing 10 CFR 50.59 changes require NRC submittal. This is a less restrictive administrative change with no effect on safety since no TS are deleted.	10 CFR 50.59	1
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION					
			None		
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

3.4.16

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	Table 4.1-2, Item 1	<p>ODCM</p> <p>FSAR</p>	<p>The CTS reactor coolant tritium SR is not in ITS but moved to the Offsite Dose Calculation Manual (ODCM). This is acceptable since neither CTS nor ITS have LCOs for operation or acceptance criteria related to coolant tritium or the coolant radiochemical spectrum. Coolant tritium and radiochemical spectrum are related to limits in the ODCM now. Moving these requirements to the ODCM neither eliminates nor reduces TS or ODCM requirements. Keeping these in the ODCM is acceptable since the NRC approves the ODCM, and ITS 5.5.1 controls changes. ITS 5.5.1.a oversees ODCM changes by requiring that changes: a) maintain radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I; and, b) not affect accuracy or reliability of effluent, dose, or setpoint calculations. Also, ITS 5.5.1.c requires changes be submitted to the NRC with the Radioactive Effluent Release Report required by ITS 5.6. Thus, moving these requirements to the ODCM does not change existing requirements, and ITS 5.5.1 provides change control.</p>	<p>ITS 5.5.1</p> <p>10 CFR 50.59</p>	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

3.4.16

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 4.1-2, Item 1	Plant procedures FSAR	CTS include a surveillance for a twice weekly measurement of boron concentration. ITS do not retain this requirement which is being relocated to plant procedures. Maintaining requirements for measurement of boron concentration outside of TS is acceptable because boron concentration is an intrinsic part of the verification that SDM and control rod insertion limits are met. ITS Section 3.1, Reactivity Control Systems, and 3.9, Refueling Operations, maintain requirements for the verification of shutdown margin and rod insertion limits and these requirements ensure that boron concentration is adequately monitored. Therefore, this change is a less restrictive administrative change with no effect on safety because no requirements are being deleted from TS.	10 CFR 50.59	3

add LA 4 for 3.4.16 as follows:

LA4	TABLE 4.1-2 Footnote 4	Plant procedure FSAR	CTS requires increased sampling of RCS gross activity whenever the Gross Failed Fuel (GFFD) Detector is inoperable. ITS maintains requirements for the GFFD in ITS 3.3.3, however the specific actions regarding RCS sampling is relocated,	10 CFR 50.59	3
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Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

**TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS
ITS SPECIFICATION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)**

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.1 - ACCUMULATORS					
LA1	3.3.A.3.d Table 4.1-1	TRM	<p>CTS require operation of one pressure and one level transmitter per accumulator with calibration every 18 months. ITS require ECCS accumulator pressure and level be within limits, but the requirement for operation of one pressure and one level transmitter per accumulator will be in TRM. This change is acceptable because meeting the ITS requires at least one pressure and one level transmitter operating for each accumulator and that these instruments are calibrated. Therefore, maintaining the requirement in Technical Specifications that ECCS accumulator pressure and level must be verified within required limits every 12 hours and maintaining requirements for operation and calibration of instruments required to perform these verification in the TRM provides an adequate level of assurance that ECCS accumulators will be maintained within required limits.</p>	10 CFR 50.59	1

24

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING					
LA1	3.3.A.3.e 3.3.A.3.f 3.3.A.3.g	IST Program ITS 3.5.2 BASES FSAR	CTS require three SI pumps, two RHR pumps and heat exchangers, and two recirculation pumps with associated piping and valves when the reactor is > 350°F. ITS require three ECCS trains with definitions in the Bases and system descriptions in the FSAR. The Bases specify that ECCS has three separate systems: HHSI, RHR, and recirculation. Each is divided into subsystems: three 50% capacity HHSI subsystems; two 100% capacity RHR subsystems; and, two 100% capacity recirculation subsystems. Each of these includes valves, heat exchangers, and flow paths. The subsystems are grouped into three trains so that any two can meet all assumed ECCS capability. Setting ECCS requirements in terms of trains with the subsystems and trains defined in the Bases ensures that requirements are understood and consistently applied. ITS keep the existing operability requirement for three ECCS trains; so, there is no change to existing requirements nor safety level.	10 CFR 50.59 ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

3.5.2

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.B.1	IST Program	CTS require starting the pump quarterly and operating 15 minutes at required pressure for the SI, RHR, CS, and auxiliary component cooling water pumps; and every 24 months for recirculation pumps. ITS keep the requirements to verify each ECCS pump's developed head \geq required head, but frequency is specified according to the IST Program. In addition, the requirement to run each pump 15 minutes is also moved to the IST. The IST Program is required by ITS 5.5.7 and controls inservice testing of ASME Code Class 1, 2, and 3 components. In addition, 10 CFR 50.55a(f) provides regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves be covered by an IST Program.	10 CFR 50.55.a(f) ITS 5.5.7	1
LA3	4.5.A.1.a 4.5.A.1.b 4.5.A.1.d	ITS 3.5.2 BASES	CTS include detail on ECCS test conditions, performance, and acceptance criteria. ITS keep the requirements for testing ECCS subsystem initiation and positioning of stops for HHSI injection valves, but, detail on SI system test conditions, performance, and acceptance criteria are moved to the ITS Bases.	ITS 5.5.13 10 CFR 50.55	1

Indian Point - Unit 3

LA-4

Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.6 - CONTAINMENT SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.1 - CONTAINMENT					
LA1	1.10.2	ITS LCO 3.6.1 BASES	CTS specifies that the equipment door must be closed properly for containment integrity. LCO 3.6.1 and associated SRs do not address the status of the equipment door specifically as a requirement for containment Operability, but the Bases for LCO 3.6.1 specify that the equipment door must be closed. The level of safety is unaffected by the change since there is no change in the requirement to keep the equipment door closed as a condition of containment operability.	ITS 5.5.12 13 10 CFR 50.59	1
LA2	1.10.1 1.10.3 1.10.4	BASES	CTS sets requirements for non-automatic containment isolation valves. Although this requirement is kept by ITS LCO 3.6.3, the role of non-automatic containment isolation valves is included in the Bases of ITS LCO 3.6.1. CTS also sets requirements for containment airlocks. Although this requirement is kept by ITS LCO 3.6.2, the role of containment airlocks is included in the Bases of ITS LCO 3.6.1. CTS also sets requirements for automatic containment isolation valves. Although this requirement is kept by ITS LCO 3.6.3, the role of containment isolation valves is included in the Bases of ITS LCO 3.6.1.	ITS 5.5.12 13 10 CFR 50.59	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS					
LA1	1.10.3	ITS 3.6.2 BASES	CTS specifies that both doors in each personnel air lock must be "properly closed." In addition, CTS specifies that the air lock may be used for entry, egress, or maintenance, at which time at least one air lock door shall be closed. ITS 3.6.2 maintains the requirement that containment air locks must be operable; however, the statement in CTS 1.10.3 that the air lock may be used for its intended purpose is relocated to the ITS 3.6.2 Bases. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.12 13 10CFR 50.59	1,2
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES					
LA1			Superseded by Amendment 195.		
LA2	1.10.1 1,10.4	ITS LCO 3.6.1 BASES	CTS establish requirements for containment isolation valves. Although this requirement is maintained by ITS LCO 3.6.3, the role of containment isolation valves in containment integrity is also included in the Bases of ITS LCO 3.6.1. Inclusion of requirements in CTS 1.10.1 and CTS 1.10.4 in the Bases for ITS LCO 3.6.1 has no effect on safety.	ITS 5.5.12 13 10CFR 50.59	2

Indian Point - Unit 3

LA-2

Section 3.6

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

3.6.3

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	3.6.D 4.13.A.2	ITS 3.6.3 BASES FSAR	CTS includes valve numbers when identifying containment pressure relief isolation valves and the containment purge supply and exhaust isolation valves. ITS establishes requirements for containment pressure relief isolation valves and containment purge supply and exhaust isolation valves but do not identify specific valve numbers which are relocated to the Bases and FSAR. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.12 13 10 CFR 50.54 59	2
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE					
			NONE.		
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE					
LA1	3.6.C3	ITS SR 3.6.5.1 BASES	CTS requires containment ambient temperature to be the arithmetic average of temperatures measured in at least four locations, at least once per 24 hours. ITS keeps the requirement to verify temperature every 24 hours, but the implementation details regarding number and location and the requirement to use an arithmetic average to calculate the temperature are not included in the ITS but are relocated to the ITS SR 3.6.5.1 Bases.	ITS 5.5.12 13 10 CFR 50.59	3
LA2			Not used.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 4.1-1, Item 42	FSAR Plant procedures	CTS requires the channel be checked daily and calibrated every 24 months. ITS requires verification every 24 hours that containment temperature is within limits. Although the ITS Bases specify that four temperature sensors be used, no requirement exists to use specific instruments to satisfy ITS SR 3.6.5.1 and no requirement exists for periodic calibration of these instruments. Thus, requirements for verification and calibration of the temperature sensors within containment are moved to the FSAR and Plant procedures.	10 CFR 50.59	3
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER SYSTEM					
LA1			Not used.		
LA2	4.5.B.1.a 4.5.B.1.b	IST Program	CTS requires each containment spray pump be started periodically and specify acceptance criteria. ITS keeps the requirement, but the <u>15-minute acceptance criterion</u> is relocated to the IST Program. <i>required pump run time</i>	ITS 5.5.7	3
LA3	4.5.A.2.a	ITS SR 3.6.6.5 Bases ITS SR 3.6.6.6 Bases	CTS specifies requirements for a functional test of the CS system and includes the requirement that "the tests shall be performed with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed." ITS keeps the requirement for a functional test, but the stipulation that isolation valves be closed is relocated to the Bases.	5.5.12 13 10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM					
LA1	4.5.A.2.a	ITS SR 3.6.7.4 Bases	CTS requires a functional test of the spray additive system and requires that the tests be done with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed. ITS requires a functional test of the system, but the allowance permitting isolation valves to be closed is relocated to the Bases. The level of safety is unaffected since there is no change in the requirement to maintain the hydrogen recombiner operability.	ITS 5.5.12 13 10 CFR 50.59	3
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS					
LA1	4.5.7.a.1 4.5.7.a.2.b 4.5.7.a.2.c	ITS SR 3.6.8.1 BASES ITS SR 3.6.8.2 BASES ITS SR 3.6.8.3 BASES	CTS requires periodic functional testing of hydrogen recombiners and have detailed acceptance criteria. ITS SR 3.6.8.1 requires a periodic functional test, but acceptance criteria are in ITS SR 3.6.8.1 Bases. CTS requires periodic inspections and have detailed acceptance criteria. ITS SR 3.6.8.2 requires inspections, but acceptance criteria are in ITS SR 3.6.8.2 Bases. CTS requires a periodic resistance to ground check and have detailed acceptance criteria. ITS SR 3.6.8.3 requires a periodic resistance to ground check, but acceptance criteria are in ITS SR 3.6.8.3 Bases. This is a less restrictive administrative change with no safety effect.	ITS 5.5.12 13 10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

3.6.8

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.7.a.2.a	FSAR Plant procedures	CTS requires a channel calibration of all recombiners' instrumentation and control circuits every 24 months. This requirement is not included in ITS 3.6.8, and is relocated to the Final Safety Analysis Report (FSAR) and implemented by plant procedures.	10 CFR 50.59	3
LA3	3.3.1.1	ITS 3.6.8 BASES	CTS require that two independent hydrogen recombiner systems be Operable. ITS LCO 3.6.8 maintains the requirement that two hydrogen recombiner systems must be Operable; however, the clarification that these systems are independent is relocated to the ITS 3.6.8 Bases. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.12 13 10 CFR 50.59	1
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM					
LA1	3.3.C.2.b	ITS 3.6.9 Condition A BASES	CTS specifies that an automatic IVSW valve may be inoperable seven days if, all valves that provide a duplicate function are Operable. ITS 3.6.9, Condition A, addresses one IVSW automatic actuation valve inoperable with no separate condition entry allowance which means that Condition A only applies if all valves that provide a duplicate function are Operable. The ITS 3.6.9, Condition A Bases, clarifies this with the statement, "With one IVSW automatic actuation valve inoperable, the IVSW function is still available because the redundant automatic actuation valve is OPERABLE." This is a less restrictive administrative change with no safety effect.	ITS 5.5.12 13 10 CFR 50.59	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.10 - WC&PP SYSTEM					
LA1	3.3.D.1	ITS 3.6.10 LCO Bases	CTS specifies that all "required" portions of the WC&PP are pressurized, but some parts of the WC&PP are inoperable and inaccessible. These have been disconnected, and are no longer required. CTS Bases set criteria to determine when a part of WC&PP may be declared not required. ITS SR 3.6.10.1 keeps the requirement that only "required" parts of WC&PP must be pressurized, but CTS and the CTS Bases used to establish criteria to determine when a section of WC&PP can be declared no longer required is moved to the LCO section of the LCO 3.6.10 Bases. This change is a less restrictive administrative change with no safety effect.	ITS 5.5.12 13 10 CFR 50.59	3

Indian Point - Unit 3

LA-7

Section 3.6

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

3.7 PLANT SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)					
LA1	4.1	5.5.7 Inservice Testing (IST) Program	The CTS Table 4.1-3 requirement for periodic verification of MSSV lift setpoint is based on the inservice testing requirements of the ASME Section XI Code which is included in the Inservice Testing (IST) Program.	50.55a(f)	3
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)					
LA1	4.7	5.5.7 IST Program	The CTS requirement for MSIV testing is based on the inservice testing requirements of the ASME Section XI Code which is included in the IST Program.	50.55a(f)	3
ITS SPECIFICATION 3.7.3 - MAIN BOILER FEEDPUMP DISCHARGE VALVES (MBFPDVs), MAIN FEEDWATER REGULATION VALVES (MBFRVs), AND MBFRV LOW FLOW BYPASS VALVES					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV)s					
			NONE		
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM					
LA1	3.4.E.1 3.4.E.3	TRM Plant Procedures FSAR	CTS details of AFW operability requirements that are intended to protect the pumps from damage when they are not operable are relocated to Plant Operating Procedures.	50.59	2
LA2	4.8.1.a 4.8.2	5.5.7 IST Program	The CTS requirement for AFW testing is based on the inservice testing requirements of the ASME Section XI Code which is included in the IST Program (includes check valves).	50.55a(f)	3
A9	3.4.E re number as LA3	N/A ?	CTS require that if all 3 AFW pumps are inoperable and cannot be restored within one hour, then the NRC must be notified within 24 hours regarding planned corrective action. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not repeated in the ITS to avoid the potential for contradictions.	10 CFR 50.72 10 CFR 50.723 73	4
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.7 - CITY WATER (CW)					
LA1	4.8.1.c	5.5.7 IST Program	The CTS requirement for testing of the CW supply, as based on the ASME Section XI Code which is included in the IST Program.	50.55a(f)	3
ITS SPECIFICATION 3.7.8 - COMPONENT COOLING WATER (CCW) SYSTEM					
LA1	3.3.E.1.a 3.3.E.1.c	BASES	The detailed description of the requirements for Operability of the CCW system is relocated to the Bases.	5.5.13 (Bases Control Program) 10 CFR 50.59	2
LA2	4.1	TRM FSAR	The requirements for maintaining CCW water chemistry are relocated to the TRM.	50.59	3
LA3	3.3.3.E.1.b 3.3.3.E.2.b	5.5.7 IST Program	The CTS requirement for testing the auxiliary component cooling water pumps is based on the ASME XI Code which is included in the IST Program.	50.55.a(f)	3

Indian Point - Unit 3

LA-3

Section 3.7

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.9 - SERVICE WATER (SW) SYSTEM					
LA1	3.3.F.4	BASES	Design information on what constitutes Operability of the SWS can be defined and controlled adequately in the ITS Bases.	ITS 5.5.13 Bases Control Program	2
LA2	Table 4.1-3	5.5.7 IST Program	The CTS requirement for testing of the SWS pumps is being relocated to the Inservice Testing Program.	50.54a(f) 55	3
ITS SPECIFICATION 3.7.10 - ULTIMATE HEAT SINK (UHS)					
LA1	3.3.F.5 3.3.F.6 3.3.F.7 3.3.F.8	TRM	Requirements for accelerated monitoring of UHS temperature using specific instruments whenever the UHS temperature is approaching the LCO limit of 95°F are relocated to the TRM.	50.59 ITS 5.5.13	3
ITS SPECIFICATION 3.7.11 - CONTROL ROOM VENTILATION SYSTEM (CRVS)					
			NONE		

10 CFR 50.59

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.8 - ELECTRICAL POWER SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING					
LA1	3.7.A.1 3.7.A.2 3.7.A.3	FSAR ITS 3.8.1 Bases	CTS require two physically independent transmission circuits to Buchanan substation able to supply engineered safeguards loads; 6.9 kV buses 5 and 6 energized from either 138 kV feeder 95331 or 95332; and, that either 13.8 kV feeder 13W92 or 13W93 and its associated 13.8/6.9 kV transformer be available to supply 6.9 kV power. ITS 3.8.1.a maintains the same requirement by requiring the operability of two qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system, but the description of the design of these circuits and a detailed description of the requirements for operability of these circuits are relocated to the FSAR and the ITS 3.8.1 Bases, respectively. The Bases description of the requirements for operability include the requirement that there must be one offsite circuit into the Buchanan substation for each operable offsite circuit and that these circuits into Buchanan must be physically independent.	ITS 5.5.13 <i>10 CFR 50.59</i>	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR					
LA1	3.7.A.5	ITS Bases LCO 3.8.3 FSAR Section 8.2	CTS specify that the 30,026 gallons required in offsite fuel oil reserves must be designated for IP3 use only and must be in addition to fuel requirements for other nuclear units on site. ITS LCO 3.8.3 keeps the requirement to maintain greater than a specified minimum volume of fuel oil in reserves, but the clarification that reserve minimum may include only oil designated for exclusive IP3 use is in the Bases for ITS LCO 3.8.3 and FSAR Section 8.2 . This is consistent with NUREG-1431. In addition, IP3 programs that implement FSAR changes according to 10 CFR 50.59 and ITS Bases changes according to ITS 5.5.13 require periodic submittal of FSAR and Bases changes to the NRC. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and appropriate change control and regulatory oversight are kept for the information.	10 CFR 50.59 ITS 5.5.13	1
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING					
			NONE		
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL					
LA1	3.8.A.13	ITS LCO 3.9.5 ITS 3.9.5 BASES	CTS require that the 31 and 32 RHR pumps and heat exchanger, with associated piping and valves, be operable, ITS LCO 3.9.5 requires that both RHR loops be operable and operating. The details on what constitutes an operable RHR loop are moved to the Bases. This is acceptable since ITS retains the Mode 6 requirement for enough decay heat removal capability and boron mixing using RHR loops; there is no change to existing CTS requirements.	10 CFR 50.59 ITS 5.5.13	2
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL					
			NONE.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 5.0 - ADMINISTRATIVE CONTROLS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.1 - RESPONSIBILITY					
LA1	6.0	QAP FSAR	CTS identify organizational responsibilities using Authority specific titles. ITS 2.0 and 5.0 use generic titles consistent with ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change because Authority specific management titles used in CTS are moved to the QAP. This approach is consistent with Generic Letter 88-06. The intent of Generic Letter 88-06 and this change is to reduce the unnecessary burden on NRC and licensee resources associated with processing license amendments when organizational titles are changed.	50.54(a) 10 CFR 50.59 Entirety	4
LA2	6.5 6.5.1 6.5.2 6.6.1.b 6.8.2 6.8.3	QAP	CTS set requirements for reviewers and review committees. CTS also set requirements for PORC to review and advise the Site Executive Officer, for SRC to provide independent review and audit of designated activities, for review and oversight of reportable events, for procedure review and approval, and for temporary changes to procedure requirements. Requirements for reviews and audit, for review and approval of programs and procedures, and for oversight and review by PORC and SRC are QA functions and not in ITS. These requirements are moved to the QAP which will set requirements equivalent to CTS.	10 CFR 50.54(a)	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

5.1



DOC	CTS	Destination Document	Description	Control	Change Type
LA3	6.6.1	10 CFR 50.73 NA	CTS require that the NRC be notified and a report submitted pursuant to the requirements of 10 CFR 50.73. This CTS requirement duplicates requirements imposed by 10 CFR 50.73 and does not need to be repeated in the ITS.	10 CFR 50.73	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.2 - ORGANIZATION					
LA1	6.0	<p>QAP</p> <p>FSAR</p> <p>FSAR</p>	<p>CTS identify organizational responsibilities using Authority specific titles. ITS 2.0 and 5.0 identify responsibilities using generic titles consistent with titles in ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change since Authority specific titles used in the CTS are moved to the QA Plan. Changes to Authority titles in the QAP will be controlled according to 10 CFR 50.54(a). This is consistent with Generic Letter (GL) 88-06. The intent of 80-06 and this change is to reduce the burden associated with processing amendments for title changes.</p>	<p>10 CFR 50.54(a)</p> <p>10 CFR 50.59</p>	4
LA2	6.2.2.e Table 6.2-1	<p>FSAR 9.5.2</p>	<p>CTS require core alterations be supervised by a person with an SRO license or an SRO license limited to fuel handling and that this person have no other responsibilities. This is identical to 10 CFR 50.54 (m)(2)(iv) and does not need repetition in ITS. This is also in the FSAR and Plant procedures. In addition, CTS specify that two SROs are needed during core alterations with the clarification that this includes the SRO supervising fuel movement. This is consistent with 10 CFR 50.54 (m)(2) and does not need repetition in ITS. Administrative controls ensure this is understood and implemented.</p>	10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

5-2

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 6.2-1	Administrative controls FSAR	CTS specify the minimum shift crew composition for SROs and ROs which duplicate the requirements specified in 10 CFR 50.54(m)(2)(i). Therefore, minimum shift crew composition for SROs and ROs is not included in the ITS. Adequate administrative controls exist to ensure shift staffing requirements are understood and properly implemented.	10 CFR 50.54(m)(2) 10 CFR 50.59	4
A4	6.2.2.i	Administrative controls FSAR	CTS require that the Shift Manager hold an SRO license. At IP3, Shift Manager is the Authority specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. Thus, this requirement is redundant to 10 CFR 50.54 (m)(2)(ii) and is not repeated in the ITS.	10 CFR 50.54 (m)(2)(ii) 10 CFR 50.59	4

remember as LA 4 ?

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.3 - UNIT STAFF QUALIFICATIONS					
LA1	6.0	FSAR	<p>CTS identify organizational responsibilities using Authority specific titles. ITS 2.0 and 5.0 use generic titles consistent with titles used in ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change since Authority specific titles in the CTS are moved to the FSAR.</p> <p>Changes to Authority specific titles in the QA Plan will be controlled according to 10 CFR 50.59. This is consistent with Generic Letter 88-06. The intent of Generic Letter 88-06 and this change is to reduce the burden associated with processing amendments for organizational title changes.</p>	10 CFR 50.59	4
LA2	6.4.1	FSAR 12.2	<p>CTS require that a retraining and replacement training program for the plant staff be maintained under the Training Manager and that this program meet or exceed Section 5.5 of ANSI N18.1-1971 and 10 CFR 55.59. The requirements for a retraining and replacement training program are not retained in the ITS. The level of safety of facility operation is unaffected by the change because there is no change in the overall operational requirements.</p>	10 CFR 55.59 10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.4 - PROCEDURES					
LA1	6.8.1.d 6.8.1.e	NONE	CTS require that written procedures be established, implemented, and maintained for the Security and Emergency Plans. These requirements are not retained in ITS 5.4.1 because 10 CFR already establishes requirements for written procedures for Emergency and Security Plans. This change is consistent with recommendations in Generic Letter 93-07. Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans, and has no significant adverse effect safety.	10 CFR 50.54(p) 10 CFR 50.54(t) 10 CFR 73.55(b)(3) 10 CFR 50 APPENDIX E SECTION V	4
LA2	6.13	Administrative controls. FSAR	CTS provide requirements for environmental qualification of electrical equipment. These requirements are not retained in the ITS. Adequate administrative controls exist to ensure this requirement is understood and properly implemented.	10 CFR 50.49 10 CFR 50.59	4

Indian Point - Unit 3

LA-6

Section 5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM					
LA1	4.2.1.3.d	ASME Boiler and Pressure Vessel Code NA	CTS specify that detailed records of each ASME Inservice Inspection must be maintained to allow comparison and evaluation of future inspections. This detail is not maintained in ITS 5.5.7, Inservice Testing Program, because requirements for comparison and evaluation of ASME Section XI inspection results are identified in the ASME Boiler and Pressure Vessel Code. There is no change to the existing requirements and appropriate regulatory controls and change control processes are maintained. This change has no significant adverse effect on safety.	ASME Boiler and Pressure Vessel Code	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.8 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM					
A7	4.9.C.3	Administrative Controls NA	CTS and ITS specify that notification of the NRC within 15 days is required if results of SG tube inspections fall into Category C-3. However, not included in ITS is the detail in CTS that the written follow-up of this report must provide a description of investigations to determine the cause of the tube degradation and corrective measures taken is not included in ITS. This is acceptable because the required follow-up report would be made according to 10 CFR 50.73. Reporting under 10 CFR 50.73 would apply for this situation because Category C-3 results for a SG would meet one or more of the 10 CFR 50.73 reporting criteria. The content requirement for 10 CFR 50.73 reports includes the detailed information described in CTS. This is change has no effect on safety because it only removes a reporting requirement from the CTS which is redundant with reporting requirements already stated in NRC regulations.	10 CFR 50.73	4
ITS SPECIFICATION 5.5.9 - SECONDARY WATER CHEMISTRY PROGRAM					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)					
LA1	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B	ITS LCO 5.5.10 FSAR	CTS include technical details that are specified in Regulatory Guide 1.52 and ANSI N510-1975 such as the test fluid for penetration testing. These requirements are maintained in ITS 5.5.10 by specific reference to Regulatory Guide 1.52 and ANSI N510-1975. No change control process or regulatory oversight is required to maintain these requirements because specific revisions of Regulatory Guide 1.52 and ANSI N510 are identified in the ITS. SEE NEXT PAGE	NONE 10 CFR 50.59	4 1
LA2	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B	ITS 5.5.10	CTS include technical details that are specified in Regulatory Guide 1.52 and ANSI N510-1975 such as the test fluid for penetration testing. These requirements are maintained in ITS by specific reference to Regulatory Guide 1.52 and ANSI N510-1975. No change control process or regulatory oversight is required to maintain these requirements because specific revisions of Regulatory Guide 1.52 and ANSI N510 are identified in the ITS.	NONE	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

correct description for S.S.10 LA1:

CTS specifies that the containment Air Filtration System shall use activated charcoal with an ignition temperature greater than 300°F. This is a design parameter maintained in the FSAR, not a test acceptance criteria used in ITS.

insert for page LA-13

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM					
LA1	ETS 1.2.1 ETS 2.2.1	ITS 5.5.11 Program 00cm	CTS establish requirements for control of radioactive material in outdoor tanks not surrounded by liners, dikes, or walls able to hold the tank contents and not having tank overflows and surrounding area drains connected to the liquid radwaste treatment system. The requirements include limits on the quantity of radioactive material in these tanks, monitoring of contents, and actions if limits are unmet. ITS 5.5.11 sets the limit on the amount of radioactive material in these tanks, but, requirements for monitoring tank contents and actions if limits are unmet are relocated to the program required by ITS 5.5.11. By maintaining the limit on the quantity of radioactive material in the specified tanks as an ITS requirement, ITS 5.5.11 maintains in TS the limit intended to ensure that in an uncontrolled release of the tanks' contents, resulting concentrations would be < the values in Appendix B, Table 2, Column 2 to 10 CFR 20, at the nearest potable water supply and the nearest surface water supply in an unrestricted area.	10 CFR 50.59 ITS 5.5.1	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

5.5.11

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	ETS 1.3.1 ETS 2.3.1	ITS 5.5.11 Program TRM	CTS establish requirements for limiting concentration of hydrogen and oxygen in the waste gas holdup system. The requirements include maximum concentrations of hydrogen and oxygen, requirements for periodic monitoring of contents, and actions if limits are unmet. ITS 5.5.11, requires that a program be maintained to limit concentrations of hydrogen and oxygen in the waste gas holdup system and requires that a surveillance program be maintained to ensure these limits are met, but specific requirements for concentration, periodic monitoring of tank contents, and actions if limits are not met are relocated from TS to the program required by ITS 5.5.11. The QAP will be revised to specify that requirements in the TRM are part of the facility as described in the FSAR and that changes to the TRM can be made only in accordance with 10 CFR 50.59.	10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

5.5.11

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	ETS 1.3.2 ETS 2.3.2	ITS 5.5.11 Program ODCM	<p>CTS set requirements to control radioactive material in radioactive gas storage tanks. The requirements include limits on quantity of radioactive material in any tank, monitoring of tank contents, and actions if limits are unmet. ITS 5.5.11 keeps the limit on the amount of radioactive material, but requirements for periodic monitoring of contents and actions if limits are unmet are relocated to the ODCM.</p> <p>ITS 5.5.11 program. By keeping the limit on the quantity of radioactive material in the tanks as an ITS requirement, ITS 5.5.11 keeps in TS the limit which ensures that in an uncontrolled release, the exposure to a member of the public at the site boundary would not exceed 0.5 rem in a 2-hour event. The QAP will specify that TRM requirements are part of the facility as described in the FSAR and that changes to the TRM can be made only according to 10 CFR 50.59.</p>	10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

5.5.11

DOC	CTS	Destination Document	Description	Control	Change Type
LA4	ETS 1.1.1 ETS 2.1.1	ITS 5.5.11 TRM QAP	<p>CTS set requirements for instrumentation used to monitor and control explosive gas in the waste gas holdup system. ITS 5.5.11 requires that a program be maintained to limit hydrogen and oxygen in the waste gas holdup system and ensure limits are met, but specific requirements for operating and testing this instrumentation and compensatory actions are moved to the program required by ITS 5.5.11. Putting requirements for these instruments in a program required by ITS 5.5.11 is consistent with Generic Letter 95-10 since this instrumentation does not meet 10 CFR 50.36. The Explosive Gas and Storage Tank Radioactivity Monitoring Program will be in the TRM and will include current requirements. The QAP will specify that TRM requirements are part of the facility as described in the FSAR and TRM changes can be made only according to 10 CFR 50.59.</p>	10 CFR 50.59	4
TS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM					
			NONE		
ITS SPECIFICATION 5.5.13 - TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM					
			NONE		
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	6.10	QAP	CTS specify requirements for record retention. This is not retained in the ITS. Record retention requirements are relocated to the QAP which establishes requirements equivalent to those found in the CTS. Changes to requirements for startup reports will be controlled in accordance with 10 CFR. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change to the existing requirements.	10 CFR 50.54(a)	4
LA3	4.3.3	Administrative controls <i>None</i>	CTS require that major changes to the radioactive waste systems be reported to the NRC in the Annual Radioactive Effluent Release Report and that this information be submitted as part of the annual FSAR update. This requirement is not retained in the ITS. Radioactive waste systems are described in the FSAR; thus, major changes to these systems must be reported according to 10 CFR. Thus, this change is identical to requirements already imposed by 10 CFR and does not need to be repeated in the ITS. In addition, adequate administrative controls exist to ensure this requirement is understood and properly implemented.	10 CFR 50.59(b)(2) 10 CFR 50.71(e)	4
A8 (LA4)	6.9.1.4 6.9.1.6.d 6.9.2	None	CTS include the mailing address for submission of required reports. CTS specify that reports shall be submitted to the Regional Administrator-Region 1 within the time specified for each report. This information is unnecessary since all reports are submitted in accordance with the direction provided in 10 CFR 50.4.	10 CFR 50.4	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA					
LA1	6.11.1	Administrative controls None	CTS specify that procedures for personnel radiation protection be prepared consistent with 10 CFR 20. In addition, CTS specify that allowance may be made for the use of respiratory protective equipment pursuant to 10 CFR 20.1703. These CTS requirements are identical to requirements imposed by 10 CFR 20.1101, Radiation Protection programs, and 10 CFR 20.1703, Use of individual respiratory protection equipment, and do not need to be repeated in the ITS. In addition, adequate administrative controls exist to ensure this requirement is understood and properly implemented.	10 CFR 20	4
LA2	6.12	Administrative controls None	CTS identify exceptions taken to 10 CFR 20.1601 pursuant to 10 CFR 20, paragraph 20.1601(c). CTS include the specification that mrem are measured at 30 centimeters from the source of radioactivity and rads are measured at 1 meter from the source of radioactivity. These specifications are not included in the ITS because equivalent but more precise definitions are found throughout 10 CFR 20. In addition, adequate administrative controls exist to ensure this requirement is understood and properly implemented.	10 CFR 20	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations