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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	1.1	1.0, 4.3.A.2
A.2	The definitions of CHANNEL, FUEL DESIGN LIMITING RATIO (FDLRX), LIMITING CONTROL ROD PATTERN (LCRP), PHYSICS TESTS, REPORTABLE EVENT, SOURCE CHECK, and TRIP SYSTEM are deleted since specific Specifications referring to them no longer contain their use, or no longer are retained in the Dresden 2 and 3 ITS.	N/A	1.0
A.3	Revises the wording for the definitions of CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST AND LOGIC SYSTEM FUNCTIONAL TEST to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" sensor, alarm, or channel failure trip function, and conversely, some channels may have a "required" display or interlock function. Also, combining the separate definition/requirement for analog and bistable channels, and the phrase "or actual," in reference to the injected signal for the CHANNEL FUNCTIONAL TEST, has been added as an explicit option to the currently required simulated signal.	1.1 CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.0
A.4	Revises the wording for the definition of CHANNEL CALIBRATION to clarify requirements for thermocouples and RTDs. The intent of a CHANNEL CALIBRATION is to adjust the channel output so that the channel responds with known range and accuracy. Most instrument channels contain an adjustable transmitter (sensor) which is also subject to drift. The appropriate calibration at the Frequencies specified in the Dresden 2 and 3 ITS would consist of a verification of OPERABILITY of the sensing element and a calibration of the remaining adjustable devices in the channel. Calibration of the adjustable devices in the channel is performed by applying the sensing elements' (RTDs or thermocouples) fixed input/output relationships to the remainder of the channel and making the necessary adjustments to ensure range and accuracy.	1.1 CHANNEL CALIBRATION definition	1.0
A.5	Incorporates the current definition of CRITICAL POWER RATIO into the proposed definition of MINIMUM CRITICAL POWER RATIO.	1.1 MINIMUM CRITICAL POWER RATIO definition	1.0

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A.6	Deletes the definition of FREQUENCY NOTATION since the abbreviations in Table 1.1 are no longer used; SR Frequencies in the Dresden 2 and 3 ITS are directly specified.	N/A	1.0, Table 1.1
A.7	Combines the current definitions for IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE into one proposed defined term: LEAKAGE.	1.1 LEAKAGE definition	1.0
A.8	Provides clarifications: 1) as specified in the second portion of the current definition of IDENTIFIED LEAKAGE (proposed LEAKAGE definition), the intended leakage is that which occurs into the drywell space (i.e., containment atmosphere); and 2) the "collection systems" specified in the first portion of the definitions are intended to be those for collection of leakages into the drywell space.	1.1 LEAKAGE definition	1.0
A.9	Moves the definition of OFFSITE DOSE CALCULATION MANUAL to ITS 5.5.1.	5.5.1	1.0
A.10	Replaces OPERATIONAL MODE with the ITS definition of MODE. Clarifying statements are added to indicate that defined MODES in ITS Table 1.1-1 apply only when fuel is in the reactor vessel and that reactor vessel head closure bolt tensioning is a parameter.	1.1 MODE definition	1.0
A.11	Deletes the definitions of PRIMARY CONTAINMENT INTEGRITY and SECONDARY CONTAINMENT INTEGRITY; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section.	N/A	1.0
A.12	Moves the definition of PROCESS CONTROL PROGRAM to the Administrative Controls Chapter (Chapter 5.0).	5.0	1.0
A.13	Modifies the definition of SHUTDOWN MARGIN to address stuck control rods, consistent with the Dresden 2 and 3 CTS requirement found in CTS 4.3.A.2 to account for the worth of a stuck control rod.	1.1 SHUTDOWN MARGIN definition	1.0, 4.3.A.2

A.14	Adds definitions of STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME consistent with their usage throughout the Dresden 2 and 3 ITS.	1.1 STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME definitions	N/A
A.15	Moves CTS Table 1.2, footnotes (a), (b), and (c) to LCO requirements in the Special Operations Section.	3.10.1, 3.10.2, 3.10.3	Table 1.2 footnotes (a), (b), (c)
A.16	Deletes CTS Table 1.2, footnote (d), which references Special Test Exceptions 3.12.A, 3.12.B, and 3.12.C.	N/A	Table 1.2 footnote (d)
A.17	The intent of applying the MODE definition only when fuel is in the vessel, as specified in CTS Table 1.2, footnote (c), has been moved to the definition of MODE. In addition, since the vessel head can only be removed if the head closure bolts are less than fully tensioned, there is no purpose in including "or with the head removed."	1.1 MODE definition	Table 1.2 footnote (c)
A.18	Adds Sections 1.2, Logical Connectors, 1.3, Completion Times, and 1.4 Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2, 1.3, 1.4	N/A
A.19	Modifies the definition of REACTOR PROTECTION SYSTEM RESPONSE TIME to allow the associated time to be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.	1.1 REACTOR PROTECTION SYSTEM RESPONSE TIME definition	1.0

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised wording.	2.0	2.0
A.2	Moves requirements for the Limiting Safety System Settings to ITS Section 3.3.	3.3	2.2
A.3	Deletes the details contained in the Actions of CTS 2.1.A, 2.1.B, 2.1.C, and 2.1.D to comply with the requirements of Specification 6.7, since the ITS format does not include providing cross references. In addition, the reference to Specification 6.7 has been deleted since Specification 6.7 has been deleted from the Technical Specifications.	N/A	2.1.A, 2.1.B, 2.1.C, 2.1.D
A.4	Modifies CTS 2.1.B consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated August 3, 1999.	2.1.1.2	2.1.B

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	3.0	3.0, 4.0
A.2	Renumber the CTS 3.0 series to LCO 3.0.X and the CTS 4.0 series to SR 3.0.X.	3.0	3.0, 4.0
A.3	1) Replaces the phrase "Compliance with...is required" with the phrase "LCOs shall be met;" 2) Changes "OPERATIONAL MODE(s)" to "MODES;" 3) Changes "conditions specified therein" to "specified conditions in the Applicability;" and 4) Changes the phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.E" to "as provided in LCO 3.0.2 and LCO 3.0.7." (LCO 3.0.2 addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. LCO 3.0.7 addresses another situation when an LCO requirement is allowed not to be met.)	LCO 3.0.1	3.0.A
A.4	1) Replaces the lead-in sentence "Noncompliance with a Specification shall exist when..." with "Upon discovery of a failure to meet an LCO..."; 2) Changes the phrase "restored" to "met or is no longer applicable;" 3) Changes "time intervals" to "Completion Time(s);" 4) Changes "ACTION requirements" to "Required Action(s);" 5) Adds exception to LCO 3.0.6 due to its inclusion in the Dresden 2 and 3 ITS; and 6) Adds the phrase "unless otherwise stated" consistent with current Dresden 2 and 3 TS exceptions found in a few LCOs to avoid potential misapplication of those requirements.	LCO 3.0.2	3.0.B
A.5	1) Replaces the phrase "except as provided in the associated ACTION requirements" with "and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS" to cover all potential possibilities that require entry into LCO 3.0.3; 2) Changes "OPERATIONAL MODE" to "MODE or other specified condition;" 3) Revises the times to reach each MODE to include the 1 hour allowed by CTS 3.0.C for initiating the shutdown. Also, the time represents the total time allowed from the entry into LCO 3.0.3, replacing the current presentation where each time is referenced as "the next," or "the subsequent;" 4) Changes the phrase "under the ACTION requirements...failure to meet the Limiting Condition for Operation" to "in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required," to specifically state that LCO 3.0.3 actions do not have to be completed; and 5) Changes "This specification is not applicable in OPERATIONAL MODE 4 or 5" to "LCO 3.0.3 is only applicable in MODES 1, 2, and 3."	LCO 3.0.3	3.0.C

A.6	1) Revises the phrase "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." to include "or that are part of a shutdown of the unit;" 2) Adds the sentence "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	LCO 3.0.4	3.0.D
A.7	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)).	LCO 3.0.6	N/A
A.8	ITS LCO 3.0.7 is added to provide guidance regarding the meeting of Special Operations LCOs in Section 3.10.	LCO 3.0.7	N/A
A.9	ITS SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," is proposed to clarify existing intent that is not explicitly stated. The concept (editorially rewritten) found in the first sentence of CTS 4.0.C, has been moved to the third sentence of ITS SR 3.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance Requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.C, to ITS SR 3.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase is also added: "or variables outside specified limits."	SR 3.0.1	4.0.A, 4.0.C
A.10	"The specified Frequency for each Surveillance Requirement is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met," was added to clearly establish what constituted meeting the specified Frequency of each Surveillance Requirement. Also, the sentence "Exceptions to this Specification are stated in the individual Specifications" is added to acknowledge the explicit use of exceptions in various Surveillances.	SR 3.0.2	4.0.B

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SECTION 3.0 - LCO AND SR APPLICABILITY

A.11	1) Changes "Entry into an OPERATIONAL MODE or other specified applicable condition" to "Entry into a MODE or other specified condition in the Applicability of an LCO."; 2) Rewords "...passage through or to OPERATIONAL MODE(s) as required to comply with ACTION requirements" to "entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit"; and 3) Adds the sentence "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	SR 3.0.4	4.0.D
A.12	Moves the technical content of CTS 4.0.E to ITS 5.5.6.	5.5.6	4.0.E
A.13	ITS LCO 3.0.8 and ITS SR 3.0.5 have been added to reflect the use of the LCOs and SRs for dual unit sites.	LCO 3.0.8, SR 3.0.5	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.3.A
A.2	Changes the passive CTS 3.3.A Action 2 words of "verify...inserted," to the active ITS 3.1.1 Required Actions C.1 and D.1 "Initiate action to fully insert..."	3.1.1 Required Actions C.1 and D.1	3.3.A Action 2
A.3	Deletes redundant actions of CTS 3.3.A Actions 2 and 3, which require suspension of activities that could reduce the SDM, when the SDM is not within limits in MODES 3, 4, or 5. In MODES 3 and 4, the vessel head is bolted in place, and the only activity that can significantly reduce SHUTDOWN MARGIN (SDM) is control rod withdrawal, for which a Required Action that ensures control rods remain inserted is provided. In MODE 5, the only activities that can affect SDM are CORE ALTERATIONS and control rod withdrawal, for which Required Actions are provided to suspend CORE ALTERATIONS and ensure control rods remain inserted.	N/A	3.3.A Actions 2 and 3
A.4	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.3.A Actions 2 and 3
A.5	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.3.A Actions 2 and 3
A.6	Enhances presentation by requiring actions to be immediately initiated to insert all required control rods (completing the actions as soon as possible) in lieu of current requirement to insert the required control rods in 1 hour (initiating the actions as soon as possible).	3.1.1 Required Action E.2	3.3.A Action 3
A.7	A specific completion time for the SDM test is proposed to clarify when "prior to or during the first startup" applies. Most SDM tests are performed as an in-sequence critical and, therefore, 4 hours after reaching criticality is provided in ITS SR 3.1.1.1 as a reasonable time to perform the required calculations and have appropriate verification completed.	SR 3.1.1.1	4.3.A.1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Replaces the activity referred to as "refueling" with "fuel movement within the reactor pressure vessel or control rod replacement, "since the intent of the Surveillance Requirement is to perform the SDM test after in-vessel activities which could have altered SDM.	SR 3.1.1.1	4.3.A.1
A.9	Moves the CTS 4.3.A.2 requirement to perform an SDM test after finding a stuck control rod to ITS 3.1.3.	3.1.3	4.3.A.2
3.1.2, Reactivity Anomalies			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.3.B
A.2	Changes "reactivity equivalence of the difference" to "reactivity difference."	LCO 3.1.2, SR 3.1.2.1	3.3.B, 4.3.B
A.3	Adds a specific time for completing the reactivity anomaly surveillance to clarify when "during the first startup" the test must be performed. This test is performed by comparing the difference between the actual critical control rod configuration to the predicted critical control rod configuration as a function of cycle exposure while at steady state reactor power conditions. Therefore, "24 hours after reaching these conditions" is provided as a reasonable time to perform the required calculations and complete the appropriate verification, meeting the intent of the CTS.	SR 3.1.2.1	4.3.B.1
3.1.3, Control Rod OPERABILITY			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.3	4.3.A, 3/4.3.C, 3/4.3.D, 3/4.3.H, 3/4.3.I,
A.2	Reorganized the Control Rod OPERABILITY Specification to include all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion.	3.1.3	3/4.3.C
A.3	Adds a Note, "Separate Condition entry is allowed for each control rod," which is consistent with the intent of the CTS.	3.1.3 ACTIONS Note	3.3.C Actions

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Adds a Note that allows for bypassing the RWM, if needed for continued operations. This note is informative in that the RWM may be bypassed at any time, provided the proper ACTIONS of CTS 3.3.L (ITS 3.3.2.1), the RWM Specification, are taken.	3.1.3 Required Actions A.1 and C.1	N/A
A.5	Replaces "being immovable, as a result of excessive friction or mechanical interference, or known to be untrippable" with the term "stuck," since details of potential mechanisms by which control rods may be stuck are not necessary for inclusion within the Condition.	3.1.3 Condition A	3.3.C Action 1, 4.3.A.2
A.6	Deletes redundant phrase exempting SR on inoperable control rods since inoperable control rods are already not required to meet this Surveillance (per CTS 4.0.D).	SR 3.0.1	4.3.C.1
A.7	Surveillance that “cross-references” other Surveillances is deleted since the listed Surveillances are required by other Specifications.	N/A	4.3.C.2
A.8	Deletes redundant provision allowing the directional control valves to be rearmed intermittently.	LCO 3.0.5	3.3.C Actions 1.a.2), 2.b, and 2.c footnote a, 3.3.H Action 1.b footnote b, 3.3.I Action 1.c footnote b
A.9	Moves the SDM allowance to the definition of SDM.	1.1 SHUTDOWN MARGIN definition	4.3.A.2
A.10	Presents the requirement that maximum control rod scram insertion time be $\leq$ 7 seconds in SR 3.1.3.4, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.4	3.3.D
A.11	Deletes the definition of time zero since it is duplicative of the definition of time zero in other CTS and maintained in footnote (a) to ITS Table 3.1.4-1.	Table 3.1.4-1 footnote (a)	3.3.D
A.12	Adds new SR to require SRs in ITS 3.1.4 to be performed, since CTS 4.3.D, which provides the scram time testing requirements, is addressed in ITS 3.1.4.	SR 3.1.3.4	4.3.D

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.13	Presents the requirement that control rods be coupled to their drive mechanism in SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.5	3.3.H
A.14	Deletes CTS 3.3.H Action 1.a, which specifies the method of restoring coupling integrity to an uncoupled control rod. ITS does not explicitly detail options to "restore...to OPERABLE." This action is always an option, and is implied in the ITS ACTIONS.	LCO 3.0.2	3.3.H Action 1.a
A.15	The separate Specification for control rod position is captured by the requirement that each control rod have at least one control rod position indication in SR 3.1.3.1.	SR 3.1.3.1	3.3.I
A.16	Moves the requirements for control rod position indication during MODE 5 (refueling) to ITS 3.9.4.	3.9.4	3.3.I
3.1.4, Control Rod Scram Times			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.4	4.3.D, 3/4.3.E, 3/4.3.F
A.2	Deletes a redundant provision that Specification 4.0.D is not applicable.	SR 3.0.4	4.3.D.2 footnote a
3.1.5, Control Rod Scram Accumulators			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.5	3/4.3.G
A.2	Moves the control rod scram accumulator OPERABILITY MODE 5 requirements to ITS 3.9.5.	3.9.5	3/4.3.G
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," which is consistent with the intent of the CTS.	3.1.5 ACTIONS Note	3.3.G
A.4	The revised presentation of CTS 3.3.G Action a.1.a.1) does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.3.G Action a.1.a.1)

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Deletes the "default" action "be in at least HOT SHUTDOWN within the next 12 hours" as there are no circumstances which preclude the possibility of compliance with an ACTION to "Declare the control rod...inoperable."	N/A	3.3.G Action 1.a
A.6	Deletes the conditions which specify when the accumulator Surveillance does not have to be performed (i.e., when the associated control rod is inserted and disarmed or scrammed), since ITS LCO 3.0.1 provides the allowance.	LCO 3.0.1	4.3.G
A.7	The method for verifying that a control rod drive pump is operating has been changed from inserting one control rod one notch to verifying that charging water header pressure is at least 940 psig. The proposed method for determining charging water header pressure provides added assurance that the charging water pressure is sufficient to insert all control rods, whereas the existing method only assures that one rod can be inserted.	3.1.5 ACTIONS B and C	3.3.G Action 1.c.1)
A.8	CTS 3.3.G Action 1.c is redundant to the Actions of CTS 3.3.C (ITS 3.1.3), and has therefore been deleted.	3.1.3 ACTIONS	3.3.G Action 1.c
3.1.6, Rod Pattern Control			
NONE	NONE	NONE	NONE
3.1.7, Standby Liquid Control System			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.4.A
A.2	Deletes the requirement to verify the "power operated or automatic" valves since the only "power operated or automatic" valves in the system is the explosive valve.	N/A	4.4.A.2.c
A.3	Revises the details of CTS 4.4.A.2.b, which identify the available boron concentration to be determined to be 14% to 16.5% by weight, to be within the limits of Figure 3.1.7-1 (SR 3.1.7.5).	SR 3.1.7.5 Figure 3.1.7-1	4.4.A.2.b

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.1.8, SDV Vent and Drain Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.8	3/4.3.K
A.2	Clarifies that the signal used for performing CTS 4.3.K.3.a and 4.3.K.3.b can be an “actual or simulated” signal.	SR 3.1.8.3	N/A
Current Specification 3/4.3.J, Control Rod Drive Housing Support			
NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System			
NONE	NONE	NONE	NONE

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SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.1	3/4.11.A
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of “OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.A
3.2.2, MINIMUM CRITICAL POWER RATIO			
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.2	3/4.11.C
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of “OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.C
3.2.3, LINEAR HEAT GENERATION RATE			
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.3	3/4.11.D
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of “OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.D
3.2.4, AVERAGE POWER RANGE MONITOR GAIN AND SETPOINT			
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.4	3/4.11.B
A.2	Revises the LCO to provide the details which are specified in the CTS 3.11.B Actions for an allowance to adjust the flow biased APRM setpoints or to adjust each APRM gain when FDLRC is greater than 1.0.	3.2.4	3.11.B

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SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes duplicate details of the FUEL DESIGN LIMITING RATIO FOR CENTERLINE MELT (FDLRC) definition in ITS Section 1.1.	N/A	3.11.B
A.4	Deletes "OPERATIONAL MODE 1" from the Applicability of “OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.B
A.5	Revises the reference to the “setpoints” of the APRM Flow Biased Neutron Flux — High trip to “Allowable Value.”	3.2.4 ACTION A	3.11.B Action 2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.1	3/4.1.A, 2.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel" and revises the wording for CTS Actions 1, 2 and 3 ("One or more required channels" and "One or more Functions"), which is consistent with the intent of the CTS.	3.3.1.1 ACTIONS Note 1, 3.3.1.1 ACTIONS A, B, and C	3.1.A Actions
A.3	These changes to CTS 3/4.1.A are provided in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.1.1 ACTIONS A, B, C, and D, Surveillance Requirements Note 2, SR 3.3.1.1.5, SR 3.3.1.1.11, SR 3.3.1.1.12	3/4.1.A
A.4	RPS trip capability not maintained replaces the explicit reference to Functional Units 1 through 12 in CTS 3.1.A Actions 1 and 2 have been deleted. Each of these Functional Units are automatically actuated when the parameter exceeds the associated trip setpoint and since each of these Functions include four redundant channels and the loss of one channel in each trip system does not result in a loss of function. In addition, the explicit reference in CTS 3.1.A Action 3 to Functional Units 13 or 14 have been deleted, since Functions (Reactor Mode Switch Shutdown Position and Manual Scram) do not include four redundant channels, thus ITS 3.3.1.1 ACTION C (RPS trip capability not maintained) is required when any of the associated channels are found to be inoperable.	N/A	3.1.A Actions 1, 2, and 3
A.5	Moves the CTS Table 3.1.A-1 footnote (g) and CTS Table 4.1.A-1 footnote (m) requirement that the APRM Functional Units 2.a and 2.d be Operable during shutdown margin demonstrations performed per Specification 3.12.B to ITS 3.10.7.	3.10.7	Table 3.1.A-1 footnote (g), Table 4.1.A-1 footnote (m)

A.6	CTS Table 3.1.A-1 footnote (f) and CTS Table 4.1.A-1 footnote (i) state that the Reactor Vessel Steam Dome Pressure — High Function (Functional Unit 3) is not required to be OPERABLE in MODE 2 when the reactor vessel head is removed per CTS 3.12.A. CTS Table 3.1.A-1 footnote (h) and CTS Table 4.1.A-1 footnote (n) state that the Drywell Pressure — High Function (Functional Unit 7) is not required to be OPERABLE in MODE 2 when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.1.A-1 and 4.1.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.1.A-1 footnotes (f) and (h), Table 4.1.A-1 footnotes (i) and (n)
A.7	All MSIV channels are required to be OPERABLE to assure a scram with the worst case single failure. In the ITS, each MSIV contact is viewed as a separate channel (a total of 16 channels). Therefore, the minimum number of channels per trip system is more appropriately specified as "8" in Function 5 of ITS Table 3.3.1.1-1.	Table 3.3.1.1-1 Function 5	Table 3.1.A-1 Functional Unit 5
A.8	These changes to CTS 3/4.1.A and 2.2.A are provided in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter PSLTR 00-0054, dated February 18, 2000.	N/A	3/4.1.A, 2.2.A
A.9	Removes the cross references to the Special Operations LCOs due to the change described in DOC L.4 for ITS 3.3.1.1.	N/A	Table 3.1.A-1 footnote (i), Table 4.1.A-1 footnote (j)
A.10	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs. Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.1.1-1	2.2.A, 2.2.A Action, Table 2.2.A-1
A.11	Not used.		
A.12	Removes the CHANNEL FUNCTIONAL TEST Surveillance Frequency of "S/U" and footnote (c) of CTS Table 4.1.A-1 for Functional Units 1.a and 2.a "within 24 hours before startup, if not performed within the previous 7 days." These notations are redundant to the requirements of proposed SR 3.0.4, which requires the periodic weekly Surveillances to be performed and current prior to entry into the applicable operational conditions.	SR 3.0.4	Table 4.1.A-1 Functional Units 1.a and 2.a Frequency and footnote (c)

A.13	Deletes the daily (D - 24 hours) CHANNEL CHECK Frequency for CTS Table 4.1.A-1 Functional Unit 2.b, since it is already covered by the shiftly (S - 12 hours) CHANNEL CHECK Frequency of Table 4.1.A-1 Functional Unit 2.b.	N/A	4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b
A.14	The CTS Limiting Safety System Settings (Setpoints) Table 2.2.A-1 has been combined with the current RPS Technical Specification (CTS 3/4.1.A). The information in CTS Table 2.2.A-1 is located in ITS Table 3.3.1.1-1.	3.3.1.1, Table 3.3.1.1-1	Table 2.2.A-1, 3/4.A.1
A.15	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	Table 3.3.1.1-1 Function 4	Table 2.2.A-1 Functional Unit 4
3.3.1.2, SRM Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.2.G, 3/4.10.B
A.2	CTS requirements to "verify all insertable control rods...inserted," are replaced in ITS 3.3.1.2 Required Action D.1 with an equivalent but more definitive requirement to "Fully insert...."	3.3.1.2 Required Action D.1	3.2.G Action 2
A.3	Adds a Note to the Surveillance Requirements to provide direction for proper application of the Surveillance Requirements for Technical Specification compliance.	3.3.1.2 Surveillance Requirements Note	N/A
A.4	Adds to the CTS 3.10.B Action the phrase, "except for control rod insertion," CTS and ITS definition of a CORE ALTERATION also includes control rod insertion and to comply with the CTS action to suspend CORE ALTERATIONS means to stop any <u>additional</u> CORE ALTERATIONS but not control rod insertion.	3.3.1.2 ACTION E	3.10.B Action
3.3.2.1, Control Rod Block Instrumentation			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	3/4.2.E, 3/4.3.L, 3/4.3.M
A.2	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.2.1-1	3.2.E, 3.2.E Action 1, Table 3.2.E-1
A.3	The reference to "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER" is not used in the ITS. In both the CTS and ITS with THERMAL POWER $\geq$ 30% RTP, the unit will always be in MODE 1 (Operational Condition 1). In addition, CTS Tables 3.2.E-1 and 4.2.E-1 footnotes (e) and (d), respectively and LCO 3.3.M (ITS Table 3.3.2.1-1 Note (a)) have been modified to not require the RBM to be Operable when a peripheral control rod is selected, since this Note explains the RBM design feature which includes an automatic bypass when a peripheral rod is selected.	Table 3.3.2.1-1 Functions 1.a, 1.b, and 1.c, and Note (a)	Tables 3.2.E-1 and 4.2.E-1 Functional Units 1.a, 1.b, and 1.c, including footnotes (d) and (e) respectively, 3.3.M
A.4	These changes to CTS 3/4.2.E are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.2.1 Surveillance Requirements Note 2, SR 3.3.2.1.1	3/4.2.E
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.2.J
A.2	Replaces the term “Trip Setpoint” with “Allowable Value,” since current plant practice uses the Trip Setpoint as the Operability limit (i.e., consistent with the use of the term “Allowable Value” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.2.2.4	3.2.J, 3.2.J Action, Table 3.2.J-1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.2.2 ACTIONS Note	3.2.J Actions

A.4	These changes to CTS 3/4.2.J are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.2.2 ACTIONS A, B, and C, 3.3.2.2 Surveillance Requirements Note	3/4.2.J
A.5	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	SR 3.3.2.2.4	Table 3.2.J-1 Functional Unit
3.3.3.1, Post Accident Monitoring Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.1	3/4.2.F
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.1 ACTIONS Note 2	3.2.F Actions
A.3	Not used.		
A.4	Moves the details concerning the technical content of the Special Report specified in CTS 3.2.F-1 Action 61.b) to ITS 5.6.	5.6	Table 3.2.F-1 Action 61.b
3.3.4.1, ATWS-RPT Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.2.C
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.1 ACTIONS Note	3.2.C Actions
A.3	These changes to CTS 3/4.2.C are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.4.1 Surveillance Requirements Note	3/4.2.C

A.4	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.4.1.4	3.2.C, 3.2.C Action, Table 3.2.C-1
A.5	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	SR 3.3.4.1.4	Table 3.2.C-1 Functional Unit 1
3.3.5.1, ECCS Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.2.B
A.2	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.5.1-1	3.2.B, 3.2.B Action 1, Table 3.2.B-1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.1 ACTIONS Note	3.2.B Actions
A.4	Modifies the reference point for the Reactor Vessel Water Level - Low Low and Reactor Vessel Water Level - High Functions from top of active fuel to instrument zero.	Table 3.3.5.1-1 Functions 1.a, 2.a, 3.a, 3.c, 4.a, and 5.a	Table 3.2.B-1 Functional Units 1.a, 2.a, 3.a, 3.e, 4.a, and 5.a
A.5	Not used.	N/A	N/A
A.6	CTS Table 3.2.B-1 footnote (f) and CTS Table 4.2.B-1 footnote (d) state that the Drywell Pressure—High Function (Functional Units 1.b, 2.b, 3.b, 4.b, and 5.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.B-1 and 4.2.B-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.B-1 footnote (b), Table 4.2.B-1 footnote (d)
A.7	The detail in CTS Table 3.2.B-1 Functional Unit 3.g, HPCI Manual Initiation, that there is one channel “per system” has been deleted since there is only one HPCI System per unit.	N/A	Table 3.2.B-1 Functional Unit 3.g

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

A.8	These changes to CTS 3/4.2.B are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.5.1 ACTIONS B, C, D, E, F, G, and H, 3.3.5.1 Surveillance Requirements Note 2, SR 3.3.5.1.2	3/4.2.B
A.9	Moves the technical content of the loss of power instrumentation requirements of CTS Table 3.2.B-1 Functional Units 6.a and 6.b, including Action 36 and footnotes (e), (g), and (j), and CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c), to ITS 3.3.8.1, "Loss of Power Instrumentation."	3.3.8.1	Table 3.2.B-1 Functional Units 6.a and 6.b including Action 36 and footnotes (e), (g), and (j), CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c)
A.10	Adds a Required Action to allow the HPCI pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Condensate Storage Tank Level—Low or Suppression Pool Water Level—High channel is inoperable. This allowance manually performs the instrumentation function.	3.3.5.1 Required Action D.2.2	Table 3.2.B-1 Action 35
A.11	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.B-1 Functional Unit 3.g (the HPCI Manual Initiation Function) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.1, which is a complete test of the logic, including the Manual Initiation switch, and is performed at the same Frequency.	N/A	4.2.B.1 for Table 4.2.B-1 Functional Unit 3.g

A.12	Deletes the specific CHANNEL FUNCTIONAL TEST requirement for Functional Unit 4.c, ADS Initiation Timer, and Functional Unit 4.d, ADS Low Low Level Timer, since the CFT is included in the CTS and ITS definition of CHANNEL CALIBRATION and the CFT and the CHANNEL CALIBRATION are performed at the same Frequency.	N/A	4.2.B.1 for Table 4.2.B-1 Functional Units 4.c and 4.d
A.13	Not used.		
A.14	CTS Table 4.2.B-1 Functional Unit 3.e, HPCI Reactor Vessel Water Level — High (Trip), identifies the CHANNEL CHECK as “NA”. Proposed ITS Table 3.3.5.1-1 Function 3.c, will include a CHANNEL CHECK in accordance with SR 3.3.5.1.1, at a Frequency of 12 hours. This requirement is being added consistent with the requirements currently identified for CTS Functional Units 1.a, 2.a, 3.a, and 4.a, since each of these Functional Units are associated with the same level instrumentation. Although this change identifies an additional requirement and may be considered more restrictive, since it is consistent with the current plant procedures, it is considered administrative.	SR 3.3.5.1.1	N/A
A.15	These changes to CTS 3/4.2.B are provided in the Dresden 2 and 3 ITS consistent with the Technical Specification Change Request submitted to the NRC for approval per ComEd letter PSLTR #00-0056, dated February 21, 2000.	Table 3.3.5.1-1 Function 3.d	3/4.2.B
3.3.5.2, IC System Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.2.D
A.2	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.5.2.2	3.2.D, 3.2.D Action 1, Table 3.2.D-1
A.3	The ITS does not include a CHANNEL CHECK requirement since CTS Table 4.2.D-1 has “NA” in the CHANNEL CHECK column.	N/A	Table 4.2.D-1 Functional Unit
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.2 ACTIONS Note	3.2.D Actions

A.5	Changes the column title to be on a per Function basis in ITS LCO 3.3.5.2 rather than the per Trip System basis in CTS Table 3.2.D-1. Thus, the number of required channels for CTS Table 3.2.D-1 Functional Unit (Reactor Vessel Pressure—High) is changed to "4", since there are two trip systems for this Functional Unit, with two channels per trip system.	LCO 3.3.5.2	Table 3.2.D-1 Functional Unit
A.6	These changes to CTS 3/4.2.D are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.5.2 ACTIONS A and B, 3.3.5.2 Surveillance Requirements Note	3/4.2.D
3.3.6.1, Primary Containment Isolation Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	3/4.2.A
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.1 ACTIONS Note and ACTIONS A and B	3.2.A Action 2
A.3	These changes to CTS 3/4.2.A are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.6.1 ACTIONS A, B, and C, 3.3.6.1 Surveillance Requirements Note 2, SR 3.3.6.1.2, SR 3.3.6.1.3	3/4.2.A
A.4	CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 1.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b)

A.5	Moves the requirements identified in CTS Tables 3.2.A-1 and 4.2.A-1 related to Secondary Containment Isolation (as described in footnotes (c), (d), *, and ** to Table 3.2.A-1 and footnotes (b), (c), *, and ** to Table 4.2.A-1) to ITS 3.3.6.2, “Secondary Containment Isolation Instrumentation.”	3.3.6.2	Tables 3.2.A-1 (including footnotes (c), (d), *, and **) and 4.2.A-1 (including footnotes (b), (c), *, and **)
A.6	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.1-1	3.2.A, 3.2.A Action 1, Table 3.2.A-1
A.7	The CTS action to "declare the affected system inoperable" is deleted since this instruction is essentially a "cross reference" between Technical Specifications.	N/A	Table 3.2.A-1 Action 23
A.8	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.A-1 Functional Unit 4.a, Standby Liquid Control (SLC) System Initiation, with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.6.1, which is a complete test of the logic, including the switches, and is performed at the same Frequency.	SR 3.3.6.1.7	Table 4.2.A-1 Functional Unit 4.a
A.9	CTS Table 3.2.A-1 footnote (e) for Functional Unit 7.b (Recirculation Line Water Temperature – High) states that “only one TRIP SYSTEM” is provided. The provisions of footnote (e) are not retained in the ITS. The two required channels provide inputs to a single trip string which in turn provides input to two trip systems and is adequately described in the Bases.	N/A	Table 3.2.A-1 footnote (e)
A.10	CTS Table 3.2.A-1 requires Functional Unit 3.e, Main Steam Line (MSL) Tunnel Temperature—High, to have at least 2 channels (of the 4) in each of 2 sets OPERABLE per trip system. In the ITS, this requirement is clarified by replacing the words “2 of 4 in each of 2 sets” with “2 per trip string” such that the requirement is consistent with the terminology used in BWR ISTS, NUREG-1433, Rev. 1, for describing other similar trip logic schemes.	Table 3.3.6.1-1 Function 1.e	Table 3.2.A-1 Functional Unit 3.e
A.11	Modifies the reference point for the Reactor Vessel Water Level - Low and Reactor Vessel Water Level - Low Low Functions from top of active fuel to instrument zero.	Table 3.3.6.1-1 Functions 1.a, 2.a, 5.b, and 6.b	Table 3.2.A-1 Functional Units 1.a, 3.a, 4.b, and 7.a

3.3.6.2, Secondary Containment Isolation Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.2	3/4.2.A, 4.7.P.4.b.2)
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.2 ACTIONS Note and ACTIONS A and B	3.2.A Action 2
A.3	These changes to CTS 3/4.2.A are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.6.2 ACTIONS A, B, and C, 3.3.6.2 Surveillance Requirements Note 2, SR 3.3.6.2.2, SR 3.3.6.2.3	3/4.2.A
A.4	The CTS replaces the use of the term SECONDARY CONTAINMENT INTEGRITY with the elements of that term and clarifies the need to isolate SCIVs and start the associated SGT subsystem(s).	3.3.6.2 Required Actions C.1.1 and C.2.1	Table 3.2.A-1 Action 24
A.5	CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 2.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b)
A.6	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.2-1	3.2.A, 3.2.A Action 1, Table 3.2.A-1
A.7	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	Table 3.3.6.2-1 Function 1	Table 3.2.A-1 Functional Unit 2.a

3.3.6.3, Relief Valve Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.3	3/4.6.F
A.2	Replaces the term “Setpoints” with “Allowable Values,” since current plant practice uses the Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.3-1 Functions 1.a and 2.a	3.6.F
A.3	Adds a Note to provide direction for proper application of the Surveillance Requirements to ensure Technical Specification compliance, consistent with the intent of the CTS.	3.3.6.3 Surveillance Requirements Note	4.7.F
A.4	Deletes the CTS 4.6.F.1.a CHANNEL FUNCTIONAL TEST requirement since it is redundant to the CTS 4.7.F.1.b LOGIC SYSTEM FUNCTIONAL TEST requirement performed at the same Frequency.	SR 3.3.6.3.2	4.7.F.1.a
3.3.7.1, CREV System Instrumentation			
NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3/4.2.B
A.2	A new LCO, ITS 3.3.8.1, has been written specifically for the Loss of Power (LOP) Instrumentation. The LOP Function from the current ECCS instrumentation Specification (CTS 3/4.2.B) is incorporated into this LCO. ITS 3.3.8.1 requires the instruments listed in ITS Table 3.3.8.1-1 to be OPERABLE, and the Table has the appropriate Functions from CTS Table 3.2.B-1 listed.	3.3.8.1	3/4.2.B
A.3	Replaces the term “Trip Setpoints” with “Allowable Values,” since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.8.1-1	3.2.B, 3.2.B Action 1, Table 3.2.B-1

A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.8.1 ACTIONS Note	3.2.B Actions
A.5	Deletes references to "take the ACTION required by..." in CTS Table 3.2.B-1 Action 36, since the format of the ITS does not include providing “cross references.” The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references.	N/A	Table 3.2.B-1 Action 36
A.6	These changes to CTS Table 3.2.B-1 are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd Letter dated January 11, 2000.	Note 2 to Surveillance Requirements	Table 3.2.B-1, Note (a)
3.3.8.2, RPS Electric Power Monitoring			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.9.G
A.2	The revised presentation of CTS 3.9.G Actions 1 and 2 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.9.G Actions 1 and 2
A.3	A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is in MODE 1, 2, or 3. This action is functionally equivalent to the CTS 3.0.C, which is currently required if CTS 3.9.G Actions 1 and 2 are not met (although CTS 3.0.C does provide an additional 1 hour to commence the shutdown).	3.3.8.2 ACTION C	3.9.G Actions 1 and 2
A.4	Replaces the term “setpoints” with “Allowable Values,” since current plant practice uses the setpoints as the Operability limit (i.e., consistent with the use of the term “Allowable Values” in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.8.2.2	4.9.G.2
Current Specification 3/4.2.H, Explosive Gas Monitoring			
NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.1	3/4.6.A, 3/4.6.C
A.2	CTS 3.6.A has been rewritten into two distinct options, with the first option requiring two recirculation loops and the second option only requiring one recirculation loop with the added requirements of CTS 3.6.A ACTIONS 1.b, 1.c and 1.d. Similarly, the Applicability of CTS 3.6.C has been changed from OPERATIONAL MODE(s) 1 and 2 during two loop operation to MODES 1 and 2 (ITS 3.4.1) since the first option in proposed ITS LCO 3.4.1 requires two recirculation loops with match flows to be in operation.	3.4.1, 3.4.1 ACTION C	3.6.A ACTIONS 1.b, 1.c and 1.d, 3.6.C
A.3	Deletes the requirement to increase the MCPR safety limit per CTS 2.1.B when only one recirculation loop is in operation, since the Safety Limit requirement is currently specified as the single loop limit; thus, when the plant is in single loop, the limit applies immediately, not in 24 hours as allowed by CTS 3.6.A Action 1.a.	N/A	3.6.A Action 1.a
A.4	Deletes the requirement to reduce the Average Power Range Monitor (APRM) Rod Block Trip Setpoints since this function has been relocated to the Technical Requirements Manual. In addition, deletes reference to APRM Flow Biased Neutron Flux Scram and RBM Trip Setpoints since the trip setpoints are an operational detail.	N/A	3.6.A Action 1.c
A.5	Deletes the requirement to restore the recirculation pump speeds to within the limits if they are not within the limits. ITS does not explicitly detail options to "restore...to within the specified limit" when an alternate ACTION is provided that allows continued operation.	3.4.1 ACTION B	3.6.C Action 1
A.6	Deletes CTS 3.6.C Action 2, referencing CTS 3.6.A.1, since the statement only serves as a cross reference.	N/A	3.6.C Action 2
	3.4.2, Jet Pumps		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.2	3/4.6.B
A.2	Revises the wording in CTS 4.6.B.1 and CTS 4.6.B.2 (ITS SR 3.4.2.1) to require verification that one of the criteria be met, rather than require verification that no two of the conditions exist.	SR 3.4.2.1	4.6.B.1, 4.6.B.2

3.4.3, Safety and Relief Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.6.E, 3/4.6.F
A.2	Revises the organization of the Safety and Relief Valves requirements of CTS 3/4.6.E and CTS 3/4.6.F, respectively, to be included within one Specification in the ITS (ITS 3.4.3).	3.4.3	3/4.6.E, 3/4.6.F
A.3	Not used.	N/A	N/A
A.4	Adds SR 3.4.3.2 to ensure the relief valves open when manually actuated and SR 3.4.3.3 to ensure that the relief valves will actuate on an actual or simulated automatic initiation signal, which are consistent with current testing requirements in CTS 4.5.A.4.a and 4.5.A.4.b.	SR 3.4.3.2, SR 3.4.3.3	N/A
A.5	(Unit 2) Revises CTS LCO 3.6.E to reduce the number of safety valves required to be OPERABLE consistent with the Technical Specifications change submitted to the NRC for approval per the ComEd License Amendment Request letter PSLTR 00-0061, dated February 29, 2000.	3.4.3	3.6.E
3.4.4, RCS Operational Leakage			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.6.H
A.2	Editorially changes "any 24 hour period" to "the previous 24 hour period."	3.4.4.c, 3.4.4.d	3.6.H.2, 3.6.H.4, 3.6.H Action 3
A.3	Moves the CTS 4.6.H.1 requirement for sampling of primary containment particulate and the associated footnote a to ITS 3.4.5.	3.4.5	4.6.H.1
A.4	Adds an option to reduce the leakage to within the limit in lieu of identifying the source as not IGSCC susceptible material, since restoring compliance with the LCO is always an option.	3.4.4 Required Action B.1	N/A
3.4.5, RCS Leakage Detection Instrumentation			

A.1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.6.G, 4.6.H.1
A.2	Deletes the requirement in CTS 4.6.G.1 to perform the leakage determinations of CTS 4.6.H since it duplicates the requirement of CTS 4.6.H.2 (ITS SR 3.4.4.1).	N/A	4.6.G.1
A.3	Revises the words "drywell floor drain sump pump discharge flow integrator" in CTS 4.6.G.2 with the qualified detection system name, "drywell floor drain sump monitoring system," for clarification and to provide consistency with the proposed changes to the LCO and ACTIONS.	3.4.5	4.6.G.2
3.4.6, RCS Specific Activity			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.6.J
3.4.7, Shutdown Cooling System - Hot Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.7	3/4.6.O
A.2	Deletes allowance to remove the SDC loop from operation during hydrostatic tests since these tests are not performed in MODE 3.	N/A	3.6.O footnote (c)
A.3	Adds ITS Note "Separate Condition entry is allowed for each SDC subsystem" which is consistent with the intent of the CTS.	3.4.7 ACTIONS Note 2	N/A
A.4	Deletes the requirement to demonstrate every 24 hours the OPERABILITY of at least one alternate method capable of decay heat removal for each inoperable SDC loop. It is unnecessary since the Specification requires that reactor be in MODE 4 within 24 hours (which exits this Specification), and CTS 3.6.P and the ITS 3.4.8 both require the periodic verification of the availability of an alternate decay heat removal method.	N/A	3.6.O Action 1
A.5	Deletes the requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two SDC subsystems are inoperable and the unit is unable to attain MODE 4.	N/A	3.6.O Action 1 footnote (d)
3.4.8, Shutdown Cooling System - Cold Shutdown			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

A.1	Editorial changes, reformatting, and revised numbering.	3.4.8	3/4.6.P
A.2	Adds ITS Note "Separate Condition entry is allowed for each SDC subsystem" which is consistent with the intent of the CTS.	3.4.8 ACTIONS Note	3.6.P Actions
3.4.9, RCS Pressure and Temperature (P/T) Limits			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.6.D, 3/4.6.K
A.2	Clarifies Actions to “perform an engineering evaluation...” and “determine if the Reactor Coolant System is acceptable for continued operation” with Notes that state the determination that the acceptability of the RCS for continued operation must be completed any time the requirements of the LCO are not met.	3.4.9 Conditions A and C Notes	3.6.K Action 2, 3.6.D Action
A.3	Changes the CTS Action to "restore...within 30 minutes" to "initiate action to restore ...Immediately" for conditions other than MODES 1, 2, and 3, which is consistent with the intent of the CTS.	3.4.9 Required Action C.1	3.6.K Action 1, 3.6.D Action
A.4	Deletes the reactor vessel material specimen Surveillance since it is a duplication of the regulations found in 10 CFR 50 Appendix H.	N/A	4.6.K.3
A.5	Adds Notes to clarify the current intent in CTS 4.6.K.4.a (periodic verification that reactor vessel flange and head flange temperatures are within limits) of allowing entry into the applicable conditions (i.e., $\leq$ 113°F and $\leq$ 93°F) without having performed these SRs.	SR 3.4.9.6, SR 3.4.9.7	N/A
A.6	Deletes the requirement to verify the reactor vessel and head flange temperatures within 30 minutes prior to tensioning of the head bolting studs, since it is duplicative of ITS SR 3.0.1.	N/A	4.6.K.4.b
A.7	The idle recirculation loop startup requirements have been combined into the RCS Pressure and Temperature Limits Specification, with the words "and the recirculation pump starting temperature requirements" added to the ITS 3.4.9 LCO statement. The actual description of the requirements and the limits are found in the Surveillance Requirements.	3.4.9 LCO	3.6.D
A.8	Deletes the requirement to monitor the temperature difference between an idle loop and an operating loop, since they are redundant to the loop-to-coolant requirement of CTS 3.6.D.1 (ITS SR 3.4.9.4).	N/A	3.6.D.2

A.9	Provides changes in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated February 23, 2000.	3.4.9	3/4.6.K
A.10	Deletes the CTS 3.6.K Action 1 detail that the applicable primary system coolant temperature rate of change limit cannot be exceeded while restoring the reactor vessel metal temperature and/or pressure to within the limits. CTS LCO 3.0.A (ITS LCO 3.0.1) requires compliance with the Limiting Conditions for Operation during the Operational Modes or other conditions specified.	N/A	3.6.K Action 1
3.4.10, Reactor Steam Dome Pressure			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.10	3/4.6.L
Current Specification 3/4.6.N, Structural Integrity			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.5.1, ECCS-Operating			
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.1	3/4.5.A
A.2	Deletes footnote (d), which provides a cross reference to CTS 3.9.A, since ITS 3.8.1 Required Action B.2 adequately prescribes the necessary actions when redundant required feature(s) are inoperable.	N/A	3.5.A Actions 2.a and 2.b footnote (d)
A.3	Revises CTS 4.5.A.2.c and 4.5.A.3.b.1) footnote (c) to allow the HPCI flow tests to be performed within 12 hours after adequate reactor steam pressure is available. In addition, CTS 4.5.A.4.b footnote (c) allows the ADS valve actuation test to be deferred until 12 hours after adequate reactor steam pressure is available. Adequate pressure to perform the tests also implies adequate flow must be available to perform the tests.	Note to SR 3.5.1.6, SR 3.5.1.7, and SR 3.5.1.10	4.5.A.2.c, 4.5.A.3.b.1) footnote (c), 4.5.A.4.b footnote (c)
A.4	Deletes the statements in CTS 3.5.A Actions 1, 2, 3 and 4 that require other ECCS equipment to be OPERABLE ("provided that.."). ITS 3.5.1 ACTION J provides direction for various interrelationships between ECCS subsystems and ADS. The ACTION requires entry into LCO 3.0.3 for various combinations of inoperable components, which is consistent with the present Actions for the same combinations.	3.5.1 ACTION J	3.5.A Actions 1, 2, 3 and 4
3.5.2, ECCS-Shutdown			
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.2	3/4.5.B, 3/4.5.C
A.2	Rewords SRs such that the applicable SRs for low pressure ECCS and for HPCI are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1.	SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4	4.5.B
A.3	Not used.	N/A	N/A
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.5.2 ACTION D	3.5.B Action 2, 3.5.C Action 2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

A.5	Removes statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded," since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded.	N/A	3.5.B footnote (a), 3.5.C footnote (a)
A.6	Moves CTS 3.5.C.1 and associated Applicability, Action 1, and CTS 4.5.C.1 to ITS 3.6.2.2.	3.6.2.2	3.5.C.1, 3.5.C Action 1, 4.5.C.1
A.7	As an enhanced presentation of current intent, deletes CTS 4.5.C.2.b, which requires periodic verification that the specified conditions of Applicability footnote (a) are met when the suppression pool is inoperable.	N/A	4.5.C.2.b
A.8	Revises the suppression chamber water level of "$\geq$ 8"' specified in CTS 3.5.C.2 and CTS 4.5.C.2.a to "$\geq$ 10 ft 4 inches." This change is provided in the Dresden 2 and 3 ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per a ComEd letter, dated May 20, 1999.	3.5.2.1.a	3.5.C.2, 4.5.C.2.a
3.5.3, IC System			
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.3	3/4.5.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.1, Primary Containment			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	3/4.7.A, 3.7.K.3, 4.7.K.5
A.2	Replaces the definition of PRIMARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.A with the requirement for primary containment to be OPERABLE, since all the requirements are specifically addressed in ITS 3.6.1.1 for the primary containment along with the remainder of the LCOs in the Primary Containment Section.	3.6.1.1, 3.6.1.2 3.6.1.3, 3.6.2.1, 3.6.2.2	3/4.7.A
A.3	Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing “cross references.”	N/A	3.7.A Applicability footnote (a)
A.4	CTS 4.7.A.2 (including footnote (b)), relating to the position verification of PCIVs, has been moved to ITS 3.6.1.3.	3.6.1.3	4.7.A.2 including footnote (b)
A.5	Deletes Surveillance Requirements 4.7.A.3 and 4.7.A.4, which cross reference to the requirements for the air lock and the suppression chamber. Requirements for the air lock and suppression chamber remain within the ITS; however, providing a cross reference to them only adds confusion when evaluating compliance with Primary Containment OPERABILITY.	N/A	4.7.A.3, 4.7.A.4
A.6	The drywell-to-suppression chamber bypass leakage requirement of CTS 3.7.K.3 is presented as a supporting Surveillance for Primary Containment OPERABILITY.	SR 3.6.1.1.2	3.7.K.3
3.6.1.2, Primary Containment Air Lock			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	3/4.7.C
A.2	Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing “cross references.”	N/A	3.7.C Applicability footnote (a)

A.3	A Note is proposed to be added to the ITS to facilitate use and understanding of the intent of the ITS and are consistent with the intent of the CTS. ITS 3.6.1.2 ACTIONS Note 2 requires considering the primary containment inoperable in the event air lock leakage results in the acceptance criteria being not met. In addition, ITS 3.6.1.2 Required Action C.1 will ensure that the primary containment overall leakage is evaluated, against the acceptance criteria, if an air lock is inoperable.	3.6.1.2 ACTIONS Note 2, 3.6.1.2 Required Action C.1	3.7.C Actions
A.4	Adds ITS Required Action Note "Required Actions...are not applicable if...Condition C is entered", recognizing that if both doors in the air lock are inoperable, then an "OPERABLE" door does not exist to be closed (ITS 3.6.1.2 Required Actions A.1, A.2, A.3, B.1, B.2, and B.3 cannot be met).	3.6.1.2 Required Actions A and B Note 1	3.7.C Actions
A.5	The revised presentation of CTS 3.7.C Actions 1.a and 2 do not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.C Actions 1.a and 2
A.6	The requirement for performing the overall air lock leakage test is a requirement of 10 CFR 50 Appendix J, and this requirement is embodied in ITS SR 3.6.1.2.1. It is possible that the test would not be able to be performed with an inoperable air lock door, and a plant shutdown would be required due to the inability to perform the required Surveillance. However, this restriction on continued operation need not be specified (i.e., CTS 3.7.C Action 1.b is deleted) since it exists inherently as a result of the required Appendix J testing.	SR 3.6.1.2.1	3.7.C Action 1.b
3.6.1.3, Primary Containment Isolation Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.3	3/4.7.A, 3/4.7.D, 3/4.6.M
A.2	Includes requirements for MSIVs in ITS 3.6.1.3, however, does not include requirements for the reactor building - suppression chamber vacuum breakers; they are retained in ITS 3.6.1.7. Therefore, the ITS LCO 3.6.1.3 statement excludes the OPERABILITY of the reactor building - suppression chamber vacuum breakers. In addition, since all requirements of MSIVs are included in ITS 3.6.1.3, the cross reference in CTS 3.7.D Action 1 footnote (b) to MSIVs is excluded.	LCO 3.6.1.3	3.7.D Action 1 footnote (b)

A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path," which is consistent with the intent of the CTS.	3.6.1.3 ACTIONS Note 2	3/4.7.A, 3.7.D Actions, 3.6.M Actions
A.4	Adds ITS ACTIONS Notes to facilitate the use and understanding of the intent for a system made inoperable by inoperable PCIVs; i.e., that the applicable ACTIONS for that system also apply. This requirement is currently located in CTS 3.7.D Action 2.b, but it does not cover all situations. Therefore, ITS 3.6.1.3 ACTIONS Note 3 has been added to cover all situations. ITS 3.6.1.3 ACTIONS Note 4 clarifies that these "systems" include the primary containment.	3.6.1.3 ACTIONS Notes 3 and 4	3.7.D Action 2.b
A.5	CTS 3.7.D Action 1 and the CTS 3.6.M Action do not specify penetrations with one or two isolation valves. However, ITS 3.6.1.3 Condition A applies if the affected penetration has two valves, and only one is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE." In the case of containment penetrations designed with only one isolation valve, the system boundary is considered an adequate barrier and the penetration is not considered "open" when the single isolation valve is open.	3.6.1.3 Condition A Condition C	3/4.7.A, 3.7.D Action 1, 3.6.M Action
A.6	The revised presentation of CTS 3.7.D Actions 1.a and 2.a and the CTS 3.6.M Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.D Actions 1.a and 2.a, 3.6.M Action
A.7	Deletes the phrase “power-operated” from the first part of 4.7.D.2, since the last part of 4.7.D.2 only requires each automatic isolation valve to be verified that it actuates to its isolation position. In addition, deletes the 4.7.D.2 testing requirement exclusion for the traversing in-core probe system explosive isolation valves, since they are not closed on an automatic signal.	N/A	4.7.D.2
A.8	Deletes the LCO 3.0.C statement in CTS 3.7.D Action 2 since it is redundant to the "Otherwise..." action. That is, LCO 3.0.C is not applicable anyway since a shutdown action has been provided.	N/A	3.7.D Action 2
A.9	Incorporate the requirements, provisions, actions, and associated restoration times for MSIVs into ITS 3.6.1.3, the primary containment isolation valve Specification.	3.6.1.3	3/4.6.M
3.6.1.4, Drywell Pressure			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.4	3/4.7.G

A.2	The requirement in CTS 3.7.G footnote (a), concerning the minimum drywell internal pressure (≥1.0 psig) has been deleted, since the requirement in CTS 3.7.H (ITS 3.6.2.5) to maintain differential pressure between the drywell and the suppression chamber ≥1.0 psid is sufficient to minimize the hydrodynamic loads on the torus during the blowdown.	N/A	LCO 3.7.G footnote (a)
3.6.1.5, Drywell Air Temperature			
NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.6	3/4.6.F
A.2	CTS 3.6.F includes the OPERABILITY requirements for the relief valves, including the low set relief valve group. In ITS LCO 3.6.1.6, only the two low set relief valves are required to be OPERABLE; the relief valves are covered by ITS 3.4.3.	3.6.1.6	3/4.6.F
A.3 Open BSI	Adds two Surveillance Requirements. ITS SR 3.6.1.6.1 ensures the low set relief valves open when manually actuated, which ensures that the valves and solenoids are functioning properly and that no blockage exists in the lines. ITS SR 3.6.1.6.2 ensures that the low set relief valves will actuate automatically on receipt of specific initiation signals by performance of a system functional test. These new Surveillance Requirements are consistent with current testing requirements in CTS 4.5.A.4.a and b (for ADS) except as modified in the DOCs for ITS 3.5.1, "ECCS — Operating."	SR 3.6.1.6.1, SR 3.6.1.6.2	4.5.A.4.a, 4.5.A.4.b
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.7	3/4.7.F
A.2	Not used.		
A.3	Note 2 to SR 3.6.1.7.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum.	SR 3.6.1.7.1 Note 2	4.7.F.1

3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.8	3/4.7.E
A.2	Note 2 to SR 3.6.1.8.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum.	SR 3.6.1.8.1 Note 2	4.7.E.1
3.6.2.1, Suppression Pool Average Temperature			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.7.K
A.2	CTS 3.7.K.2appears to require the 95°F and 105°F limits to apply at all times in Operational Mode 1 or 2. However, this limit actually only applies when THERMAL POWER is > 1% RTP. This is shown by CTS 3.7.K.2.b, which states that 110°F is the limit when ≤ 1% RTP. Therefore, the ITS LCO for this limit has been clarified to be at > 1% RTP. Once THERMAL POWER is ≤ 1% RTP, the LCO is met if suppression pool temperature is ≤ 110°F, thus, a shutdown to MODE 3 and MODE 4 is not required, as stated in CTS 3.0.B.	LCO 3.6.2.1.a	3.7.K.2, 3.7.K.2.b
A.3	Moves the requirements in CTS 3.7.K.3 and 4.7.K.5, relating to the drywell-to-suppression chamber bypass leakage limit, to ITS 3.6.1.1.	3.6.1.1	3.7.K.3, 4.7.K.5
3.6.2.2, Suppression Pool Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.7.K, 3/4.5.C
A.2	Not used.	N/A	N/A
A.3	Moves the requirements in CTS 3.5.C.2, 3.5.C Action 2, and 4.5.C.2, and footnote (a), relating to the suppression pool level requirements while in MODES 4 and 5, to ITS 3.5.2.	3.5.2	3.5.C.2, 3.5.C Action 2, 4.5.C.2, and footnote (a)

3.6.2.3, Suppression Pool Cooling			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.7.M
A.2	The CTS requires verification that each suppression pool cooling valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool cooling function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for suppression pool cooling, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool cooling mode, the reference to check automatic valves has been deleted.	SR 3.6.2.3.1	4.7.M.1
3.6.2.4, Suppression Pool Spray			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.7.L
A.2	The CTS requires verification that each suppression pool spray valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool spray function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for suppression pool spray, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool spray mode, the reference to check automatic valves has been deleted.	SR 3.6.2.4.1	4.7.L.1
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.5	3/4.7.H

A.2	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.2.5 ACTION B	3.7.H Action 1
3.6.3.1, Primary Containment Oxygen Concentration			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.7.J
A.2	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.3.1 ACTION B	3.7.J Action
A.3	Deletes CTS 4.7.J, which requires oxygen concentration in primary containment to be verified within limit prior to entering the Applicability of CTS 3.7.J (within 24 hours after THERMAL POWER is greater than 15% of RTP). This requirement does not need to be repeated as a separate Surveillance Frequency.	SR 3.0.4	4.0.D 4.7.J
3.6.4.1, Secondary Containment			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.1	3/4.7.N
A.2	Replaces the definition of SECONDARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.N with the requirement for secondary containment to be OPERABLE, since all the requirements are specifically addressed in the ITS and associated Bases for the Secondary Containment (3.6.4.1), the Secondary Containment Isolation Valves (3.6.4.2), and Standby Gas Treatment System (3.6.4.3).	3.6.4.1, 3.6.4.2, 3.6.4.3	3/4.7.N
A.3	Modifies the requirement to verify that one door in each access is closed to require one door in each access opening to be closed. The Dresden 2 and 3 design includes more than two doors on some of the accesses, and the current Dreden 2 and 3 interpretation of this requirement is that for these accesses, there are multiple access openings, and that each access opening must have at least one door closed.	SR 3.6.4.1.2	4.7.N.2.a
A.4	Moves the requirements in CTS 4.7.N.2.b, relating to the position of secondary containment isolation valves, to ITS 3.6.4.2.	3.6.4.2	4.7.N.2.b

3.6.4.2, Secondary Containment Isolation Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	3/4.7.N 3/4.7.O
A.2	The name and descriptive references to the secondary containment isolation dampers contained in CTS 3.7.O, 4.7.N, and 4.7.O have been generically changed to Secondary Containment Isolation Valves (SCIVs).	3.6.4.2	3/4.7.O, 4.7.N
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path." Additionally, adds ITS ACTIONS Note that facilitates the use and understanding of the intent to consider the affect of inoperable isolation valves on other systems. For a system made inoperable by inoperable SCIVs the applicable ACTIONS for that system also apply. This is consistent with the intent of the CTS.	3.6.4.2 ACTIONS Notes 2 and 3	3.7.O Action
A.4	The CTS 3.7.O Action does not specify penetrations with one or two isolation valves. However, ITS 3.6.4.2 Condition A only applies if one valve in a penetration is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE."	3.6.4.2 Condition A	3.7.O Action
A.5	The revised presentation of the CTS 3.7.O Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.O Action
3.6.4.3, Standby Gas Treatment System			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.3	3/4.7.P
A.2	Moves the filter testing requirements of CTS 4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5 and 4.7.P.6, to ITS 5.5.7. A Surveillance Requirement is added (proposed SR 3.6.4.3.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the SGT System, which is consistent with the intent of the CTS.	SR 3.6.4.3.2, 5.5.7	4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5, 4.7.P.6

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

A.3	Divides CTS 4.7.P.4.b, which verifies each SGT subsystem starts on the appropriate automatic initiation signals, into two Surveillances. The majority of the instrumentation testing will be performed in SR 3.3.6.2.3, SR 3.3.6.2.4, and SR 3.3.6.2.5, and the actual system functional test portion, which will ensure the SGT System starts on an initiation signal, will be performed as SR 3.6.4.3.3.	SR 3.3.6.2.3, SR 3.3.6.2.4, SR 3.3.6.2.5, SR 3.6.4.3.3	4.7.P.4.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.7.1, Containment Cooling Service Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.8.A
A.2	Adds "or can be aligned to the correct position" in SR 3.7.1.1 to clarify that it is permissible for the CCSW Systems' valves to be in the non-accident position and still be considered OPERABLE.	SR 3.7.1.1	4.8.A
3.7.2, Diesel Generator Cooling Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.8.B
A.2	Adds ITS Note, "Separate Condition entry is allowed for each DGCW subsystem," which is consistent with the intent of the CTS.	3.7.2 ACTIONS Note	3.8.B Actions
A.3	Deletes CTS 3.8.B Action statement referencing CTS 3.9.A or 3.9.B, since the statement only serves as a cross reference.	N/A	3.8.B Action
A.4	The CTS requires a verification that each valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. Since all the valves in the flow path are manual valves the word "manual" has been added.	SR 3.7.2.1	4.8.B.1
3.7.3, Ultimate Heat Sink			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.8.C
3.7.4, Control Room Emergency Ventilation System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.4	3/4.8.D

A.2	Moves the filter testing requirements of CTS 4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7, to ITS 5.5.7. Adds a Surveillance Requirement (proposed SR 3.7.4.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the CREV System, which is consistent with the intent of the CTS.	SR 3.7.4.2, 5.5.7	4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7
3.7.5, Control Room Emergency Ventilation Air Conditioning System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.5	3/4.8.D
A.2	In the ITS, the Control Room Emergency Ventilation and Control Room Emergency Ventilation Air Conditioning Specification has been split into separate Technical Specifications; ITS 3.7.4 for the Control Room Emergency Ventilation (CREV) System and ITS 3.7.5 for the Control Room Emergency Ventilation AC System. Therefore, in ITS 3.7.5, the LCO, Actions, and Surveillance Requirements all refer to the Control Room Emergency Ventilation AC System.	3.7.5	3/4.8.D
3.7.6, Main Condenser Offgas			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.6	3/4.8.I
A.2	Converts the units from μCi/sec/MWt to μCi/sec, by multiplying CTS limit by the Rated Thermal Power licensing basis.	LCO 3.7.6	3.8.I
A.3	Clarifies the Applicability by adding the condition of when any main steam line is not isolated, since a main condenser air ejector cannot be placed in service without main steam pressure (i.e., any main steam line not isolated). The ITS Applicability is also consistent with the CTS 3.8.I Action to be in at least STARTUP with the main steam isolation valves closed. In addition, a Required Action is added that requires the isolation of the air ejector within 12 hours to be consistent with the CTS Applicability.	3.7.6 Applicability, 3.7.6 Required Action B.2	3.8.I Applicability footnote (a)
3.7.7, Main Turbine Bypass System			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.8	3/4.10.H
A.2	Clarifies that the Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool or when new fuel is being moved in the spent fuel storage pool with irradiated fuel assemblies in the spent fuel storage pool. This is acceptable since the purpose of the LCO is to ensure sufficient water is above the irradiated fuel assemblies to meet the assumptions of a fuel handling accident.	LCO 3.7.8	LCO 3.10.H
Current Specification 3/4.8.E, Flood Protection			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.F, Snubbers			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.8.1, AC Sources - Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.1	3/4.9.A
A.2	Moves the details in CTS LCO 3.9.A.2.a relating to the required day tank level and in CTS 3.9.A.2.b relating to the bulk fuel storage tank level to ITS SR 3.8.1.4.	SR 3.8.1.4	LCO 3.9.A.2.a, LCO 3.9.A.2.b
A.3	Clarifies that a modified DG start involving idling and gradual acceleration to synchronous speed as recommended by the manufacturer may be used, but when modified start procedures are not used, the time, voltage, and frequency tolerance of SR 3.8.1.8 must be met.	SR 3.8.1.2 Note 2	4.9.A.2.c
A.4	CTS 4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, and 4.9.A.8.h specify requirements for testing of a DG (2/3 diesel generator) that is common to both units. Therefore, a Note is added to the applicable ITS SRs to clearly state the current plant interpretation, i.e., a single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.	SR 3.8.1.2 Note 3, SR 3.8.1.3 Note 5, SR 3.8.1.8 Note 2, SR 3.8.1.10 Note, SR 3.8.1.11 Note 1, SR 3.8.1.15 Note 3, SR 3.8.1.16 Note 3	4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.h
A.5	Deletes CTS 4.9.A.2.c and 4.9.A.7 footnote (c), which states that CTS 4.9.A.7 (the DG start with a 13 second time requirement) may be substituted for CTS 4.9.A.2.c (the slow start), since it is not necessary.	N/A	4.9.A.2.c and 4.9.A.7 footnote (c)
A.6	Moves the technical content of the fuel oil storage and starting air requirements in CTS 3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, and 4.9.A.10 to ITS 3.8.3.	3.8.3	3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10

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

A.7	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (an entire division may be without power), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a division.	3.8.1 ACTION D Note	3.9.A Actions
A.8	Deletes CTS 3.9.A Actions 3.b and 6.b footnote (e) detail that a successful test of OPERABILITY per CTS 4.9.A.2.c under this ACTION statement satisfies the diesel generator test requirements of ACTION(s) 1 (one offsite circuit inoperable) or 2 (one DG inoperable), since it is unnecessary. In addition, the reference to Action 1 is incorrect since there are no diesel generator testing requirements with an offsite circuit inoperable.	N/A	3.9.A Actions 3.a and 6.b, footnote (e)
A.9	CTS 4.9.A.7 and 4.9.A.9, footnote (a) and CTS 4.9.A.8.c and 4.9.A.8.h, footnote (d), which allow DG engine pre-lubrication when starting diesel generators, references CTS Surveillance Requirements that define requirements for operating DGs. Therefore, the footnotes have been deleted from these Surveillance Requirements.	N/A	4.9.A.7 and 4.9.A.9 footnote (a), 4.9.A.8.c and 4.9.A.8.h footnote (d)
A.10	CTS 4.9.A.8.c footnote (d) allows momentary transients outside of the load range during the full load reject test. This Note is not needed since the requirement specifies a load range which must be rejected and does not specify any explicit transient requirements for load.	N/A	4.9.A.8.c footnote (d)
A.11	The requirement in CTS 4.9.A.8.d.2) to verify the energization of the auto-connected shutdown loads during the loss of offsite power test has been deleted, since the Dresden 2 and 3 design does not include any auto-connected shutdown loads on a loss of offsite power by itself.	N/A	4.9.A.8.d.2)
A.12	With three or more required AC sources inoperable (e.g., two offsite circuits and one DG), ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. Since CTS 3.9.A does not provide Actions for these conditions, ITS 3.8.1 ACTION G is added to direct entry into ITS LCO 3.0.3, to preserve the existing intent for CTS 3.0.C entry.	3.8.1 ACTION G	3.9.A Actions
A.13	The requirement of CTS 4.9.A.8.f.2 that auto-connected loads be energized “through the load sequencer” is changed to “including, through time delays, where applicable.” The design does not include a load sequencer but includes “time delay relays” for some individual components.	SR 3.8.1.19	4.9.A.8.f.2

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

3.8.2, AC Sources - Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.2	3/4.9.B
A.2	Moves the details in CTS LCO 3.9.B.2.a relating to the required day tank level and in CTS 3.9.B.2.b relating to the bulk fuel storage tank level to ITS SR 3.8.2.1.	SR 3.8.2.1	LCO 3.9.B.2.a, LCO 3.9.B.2.b
A.3	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (e.g., SDC could be inoperable), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a required division.	3.8.2 ACTION A Note	3.9.B Actions
A.4	For clarity, adds an exception to CTS 4.9.A.9 (ITS SR 3.8.1.20), which is consistent with the intent of the CTS. This Surveillance is currently not required since it ensures all the DGs are OPERABLE (and no more than one DG is required while in MODES 4 and 5 and handling irradiated fuel assemblies in the secondary containment). In addition, two other exceptions have been included for clarity. CTS 4.9.A.1.b (ITS SR 3.8.1.9) is excluded since only one offsite circuit is required to be OPERABLE. ITS SR 3.8.1.21, the added requirement, for the opposite unit power sources, is excluded because the opposite unit's DG is not required to be OPERABLE by LCO 3.8.2.	SR 3.8.2.1	4.9.B
3.8.3, Diesel Fuel Oil and Starting Air			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.3	3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10, 4.9.B
A.2	The fuel oil and starting air requirements of CTS 3/4.9.A and 3/4.9.B have been moved to a new ITS LCO 3.8.3. An LCO Statement has been provided requiring fuel oil storage and starting air. The Applicability of this new LCO is "when associated DG is required to be OPERABLE." This covers the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements of CTS 3/4.9.A and 3/4.9.B.	3.8.3	3/4.9.A, 3/4.9.B

A.3	Adds ITS ACTIONS Note “Separate Condition entry is allowed for each DG,” which is consistent with the intent of the CTS.	3.8.3 ACTIONS Note	3.9.A Actions, 3.9.B Actions
A.4	Moves the technical content of CTS 4.9.A.5 and 4.9.A.6, which provide the DG fuel oil sampling requirements, to ITS 5.5.9. In addition, adds a Surveillance Requirement to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining Operability of the DGs.	SR 3.8.3.1, 5.5.9	4.9.A.5, 4.9.A.6
3.8.4, DC Sources - Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.4	3/4.9.C
A.2	Moves the technical content of CTS Table 4.9.C-1 (including CTS 4.9.C.1.a and 4.9.C.2.a) and 3.9.C Actions 4, 5, and 6, the battery cell parameter requirements and CTS 4.9.C.2.c, the average electrolyte temperature requirements to ITS 3.8.6.	3.8.6	3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1
A.3	Not used.	N/A	N/A
A.4	Deletes the explicit requirement in CTS 4.9.C.1.b to verify correct breaker alignment to each battery charger, since the ITS SR 3.8.4.1 requirement to verify battery terminal voltage, on float charge is adequate.	N/A	4.9.C.1.b
A.5	Added the specific battery charger load values that are equivalent to the manufacturer’s ratings.	SR 3.8.4.3, SR 3.8.4.7	4.9.C.3.d
3.8.5, DC Sources - Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.5	3/4.9.D
A.2	The ITS present the battery hardware components (battery and charger) in the DC Sources LCO (ITS 3.8.5). The battery cell parameters are presented in a separate LCO (ITS 3.8.6).	3.8.5, 3.8.6	3/4.9.D

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3.8.6, Battery Cell Parameters			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.6	3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1, 3/4.9.D
A.2	Presents the 250 and 125 VDC battery cell parameters limits in a separate LCO with appropriate ACTIONS and SRs. In addition, the reference in CTS 3.9.C to Table 4.9.C-1 has been replaced with limits since all battery parameters (i.e., average electrolyte temperature) are not specified in the Table. CTS 4.9.D is being deleted since its provisions only reference requirements in CTS 4.9.C, which are contained in ITS 3.8.6.	3.8.6	3/4.9.C, 3/4.9.D
A.3	Applicability presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements.	3.8.6 Applicability	3.9.C Applicability, 3.9.D Applicability
A.4	Adds ITS ACTIONS Note "Separate condition entry is allowed for each battery," which is consistent with the intent of the CTS.	3.8.6 ACTIONS Note	3.9.C Actions, 3.9.D Actions
A.5	CTS 3.9.C Action 4 allows the Category A parameters(s) to be not within limits and the battery to be considered OPERABLE, provided the associated battery charger is OPERABLE. The specific requirement for the battery charger has been deleted. Whenever any required DC battery charger is inoperable, entry into the associated actions for the DC sources is required (CTS 3.9.C Action 1 and 2 and ITS 3.8.4 ACTIONS). Therefore, the explicit requirement is not necessary in the ITS.	N/A	3.9.C Action 4
A.6	Adds a specific Condition to explicitly require the battery to be declared inoperable when the temperature is not within limit or when Category A or B limits have not been restored within the applicable time, since this is the obvious intent of the CTS.	3.8.6 ACTION B	3.9.C Actions 4, 5, and 6, 3.9.D Actions
3.8.7, Distribution Systems - Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.7	3/4.9.E

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SECTION 3.8 - ELECTRIC POWER SYSTEMS

A.2	Describes the AC and DC power distribution systems using the designator “Division 1 and Division 2,” since these are the actual division designators for the buses listed in CTS LCO 3.9.E (the current detailed listings are relocated to the Bases - see DOC LA.1 for ITS 3.8.7).	LCO 3.8.7	LCO 3.9.E.1, LCO 3.9.E.2
3.8.8, Distribution Systems - Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.8	3/4.9.F

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.1, Refueling Equipment Interlocks			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.1	3/4.10.A
A.2	Moves the Refuel Position One-Rod-Out Interlock requirements to ITS 3.9.2.	3.9.2	3/4.10.A
A.3	Since one-rod-out interlock requirements are moved to ITS 3.9.2, restrictions on equipment to be used during CORE ALTERATIONS in ITS 3.9.1 are rewritten, where the Applicability addresses the only CORE ALTERATIONS remaining, i.e., fuel movement.	3.9.1	3.10.A
A.4	Lists each actual refuel platform hoist in the Surveillance Requirement of ITS SR 3.9.1.1, versus the CTS requirement for the refuel platform "hoists" fuel loaded interlocks be Operable.	SR 3.9.1.1	3.10.A.2.c
A.5	Changed the Applicability to specify "during in-vessel fuel movement...", as currently found in CTS 3.10.A.2	3.9.1	3.10.A.2
A.6	Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position Refueling Equipment Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A).	3.10.1, 3.10.2, 3.10.3	3.10.A Applicability, 3.10.A footnote (d)
A.7	Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references.	N/A	3.10.A footnote (b)
A.8	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.10.A footnote (c)
3.9.2, Refuel Position One-Rod-Out Interlock			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.2	3/4.10.A
A.2	Deletes the requirement that the reactor mode switch shall be in the Shutdown or Refuel position, since it is an explicit part of the definition of MODE 5.	N/A	3.10.A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Moves the Refueling Equipment Interlock requirements to ITS 3.9.1.	3.9.1	3/4.10.A
A.4	The ITS Applicability reflects the current requirements for the one-rod-out interlock to be Operable in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn.	3.9.2	3.10.A.1
A.5	Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position One-Rod-Out Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A).	3.10.1, 3.10.2, 3.10.3	3.10.A Applicability, 3.10.A footnote (d)
A.6	Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references.	N/A	3.10.A footnote (b)
A.7	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.10.A footnote (c)
3.9.3, Control Rod Position			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.3	3/4.10.C
A.2	Deletes footnotes that provides a cross reference to CTS 3.10.I, 3.10.J and 3.12.B since the format of the ITS does not include providing cross references. In addition, the allowances that fuel can be loaded into the core when a rod is withdrawn under control of the reactor mode switch refuel position one-rod-out interlock has been deleted since the interlock will preclude fuel loading with a rod withdrawn.	N/A	3.10.C footnotes (a) and (b), 3.10.C Action, 4.10 C.1.b
3.9.4, Control Rod Position Indication			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.4	3/4.3.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references.	N/A	3.3.I footnote (a)
A.3	Adds ITS Note "Separate Condition entry is allowed for each required channel," which is consistent with the intent of the CTS.	3.9.4 ACTIONS Note	3.3.I Action 3
3.9.5, Control Rod OPERABILITY - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.5	3/4.3.G
A.2	Revises the Operational MODE 5 requirements to say "Each withdrawn control rod shall be OPERABLE," since ITS 3.9.5 includes requirements other than accumulator requirements.	3.9.5	3.3.G
A.3	Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references.	N/A	3.3.G footnote (a)
A.4	Deletes "unless the control rod is inserted and disarmed or scrammed," since stating the conditions for an exception to performance of the accumulator Surveillance that are equivalent to the Applicability of the LCO is unnecessary.	N/A	4.3.G
A.5	Deletes the action to disarm and the footnote to intermittently rearm the associated directional control valves. During MODE 5 with an accumulator associated with a withdrawn control rod inoperable, the control rod is required to be inserted. Once the control rod is fully inserted, the accumulator is no longer required to be OPERABLE and the entry conditions for the ACTIONS are no longer applicable, thus no additional ACTIONS are required.	N/A	3.3.G Action 2.a and footnote (b)
A.6	Moves, to ITS 3.10.7, the requirements for when more than one control rod is withdrawn with the associated scram accumulators inoperable or no control rod drive pump operating.	3.10.7	3.3.G Action 2.b
3.9.6, RPV Water Level - Irradiated Fuel			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.6	3/4.10.G
A.2	Moves, to ITS 3.9.7, the requirements for handling new fuel assemblies and control rods.	3.9.7	3/4.10.G

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling irradiated fuel assemblies, and the only MODE where it is possible to move irradiated fuel assemblies within the reactor pressure vessel is MODE 5.	N/A	3.10.G
3.9.7, RPV Water Level - New Fuel or Control Rods			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.7	3/4.10.G
A.2	Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling new fuel assemblies or control rods, and the only MODE where it is possible to move new fuel assemblies or handle control rods within the reactor pressure vessel is MODE 5.	N/A	3.10.G
3.9.8, Shutdown Cooling (SDC) - High Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.8	3/4.10.K
A.2	Requires only that loading of irradiated fuel assemblies into the reactor pressure vessel be suspended versus CTS requirement that all operations involving an increase in the reactor decay heat load be suspended, since this is the only practical method of increasing the reactor decay heat load.	3.9.8 Required Action B.1	3.10.K Action 1
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 4 hours (initiating the actions as soon as possible).	3.9.8 Required Actions B.2, B.3, and B.4	3.10.K Action 1
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.9.8 Required Actions B.2, B.3, and B.4	3.10.K Action 1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.9, Shutdown Cooling (SDC) - Low Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.9	3/4.10.L
Current Specification 3/4.10.E, Communications			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.1, Reactor Mode Switch Interlock Testing			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.1	Table 1-2, 3/4.10.A footnote d
3.10.2, Single Control Rod Withdrawal - Hot Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.2	Table 1-2, 3/4.10.A
A.2	Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable.	N/A	3.10.A Action 2
A.3	Replaces the refuel position one-rod-out interlock Surveillances (CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3) with a generic Surveillance Requirement (proposed SR 3.10.2.1) to perform all required Surveillances in accordance with the applicable SRs; in this case, with the SRs of ITS 3.9.2, Refuel Position One-Rod-Out Interlock.	SR 3.10.2.1	4.10.A.1, 4.10.A.2, 4.10.A.3
3.10.3, Single Control Rod Withdrawal - Cold Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.3	Table 1-2, 3/4.10.A, 3/4.10.I
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3/4.10.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

A.3	Since the MODE 4 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.I.2 and 4.10.I.2 references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.I.2, 4.10.I.2
A.4	CTS 3.10.I.3.a and CTS 3.10.I.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.3 does not include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	3.10.3	3.10.I.3.a, 3.10.I.3.b
A.5	Deletes CTS 3.10.I.4.b and 4.10.I.4.b allowing the four fuel assemblies surrounding the control rod or control rod drive mechanism to be removed from the core and/or reactor vessel to be removed from the core since during MODE 4, the optional requirement of CTS 3.10.I.4.b and 4.10.I.4.b cannot be physically met.	N/A	3.10.I.4.b, 4.10.I.4.b
A.6	Four new Notes have been added for clarity in ITS 3.10.3. The ITS 3.10.3 ACTIONS Note has been added to clarify that the requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications. ITS 3.10.3 Required Action A.1 Note 1 has been added to clarify that if an affected Specifications ACTIONS state to fully insert all insertable control rods, this includes placing the reactor mode switch in the Shutdown position. ITS 3.10.3 Required Action A.1 Note 2 has been added to clarify that this Required Action is only applicable if the requirement not met is an LCO, since it is written only for an LCO, not a "requirement." ITS SR 3.10.3.2 Note has been added clarifying that if proposed SR 3.10.3.1 is satisfied for ITS 3.10.3.c.1 requirements, then ITS SR 3.10.3.2 is not required to be performed.	3.10.3 ACTIONS Note, 3.10.3 Required Action A.1 Notes 1 and 2, SR 3.10.3.2 Note	N/A
A.7	Separates the CTS 3.10.I ACTION into two ACTIONS, dependent on whether the affected control rod is insertable or not. ITS 3.10.3 ACTIONS are a more detailed presentation of the existing requirement to "initiate action to satisfy the above requirements."	3.10.3	3.10.I ACTION
A.8	Replaces the refuel position one-rod-out interlock Surveillances CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3 with a generic Surveillance Requirement (proposed SR 3.10.3.1) to perform all required Surveillances in accordance with the applicable SRs since ITS 3.10.3 requires the refuel position one-rod-out interlock to be OPERABLE in accordance with ITS 3.9.2.	SR 3.10.3.1	4.10.A.1, 4.10.A.2, 4.10.A.3

A.9	Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable.	N/A	3.10.A Action 2
3.10.4, Single Control Rod Drive Removal - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.4	3/4.10.I
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3/4.10.I
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.I.2 and 4.10.I.2 references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.I.2, 4.10.I.2
A.4	CTS 3.10.I.3.a and CTS 3.10.I.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.4 does not include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	3.10.4	3.10.I.3.a, 3.10.I.3.b
A.5	Deletes the allowance of CTS 3.10.I.4.b and 4.10.I.4.b, to remove the four fuel assemblies in lieu of inserting and disarming the control rods in a 5 x 5 array since this can be done provided the requirements of ITS 3.10.5 (CTS 3.10.J) are followed.	N/A	3.10.I.4.b, 4.10.I.4.b
A.6	Added a MODE 5 Applicability requirement in ITS 3.10.4 ("with LCO 3.9.5 not met") that is derived from the intent of CTS 3.10.I, which says "the associated control rod drive mechanism may be removed from ... the reactor pressure vessel..." When the control rod drive mechanism is removed, ITS 3.9.5, which requires all withdrawn control rods to be OPERABLE, is not met.	3.10.4 Applicability	N/A

A.7	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.4 Required Action A.2.1	N/A
3.10.5, Multiple Control Rod Withdrawal - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.5	3/4.10.J
A.2	Deletes statements that require compliance with the Specification "until all control rods and control rod drive mechanisms are reinstalled and all control rods are inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3.10.J, 4.10.J.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.J.2 and 4.10.J.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.J.2, 4.10.J.1.b
A.4	Deletes redundant references, since the current MODE 5 requirements for SHUTDOWN MARGIN (SDM) in CTS 3.10.J.3 and Surveillance testing in CTS 4.10.J.1.c are adequate without explicit reference to them.	N/A	3.10.J.3, 4.10.J.1.c
A.5	Adds a MODE 5 Applicability requirement in ITS 3.10.5 ("with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met") is derived from the intent of CTS 3.10.J, which says "Any number of control rods and/or control rod drive mechanisms may be removed from the core and/or reactor pressure vessel..." During the performance of these activities, ITS 3.9.3 (which requires all control rods to be fully inserted), ITS 3.9.4 (which requires each control rod full-in position indication channel for each control rod to be OPERABLE), and ITS 3.9.5 (which requires all withdrawn control rods to be OPERABLE) are not met.	3.10.5	N/A
A.6	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.5 Required Action A.3.1	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

3.10.6, Control Rod Testing - Operating			
NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.7	3/4.1.A, Table 3.1.A-1, Table 4.1.A-1, 3.3.G, 3.3.H, 3/4.12.B
A.2	Deletes the exceptions in CTS 3.12.B to CTS 3.10.A (ITS 3.9.1 and ITS 3.9.2) and CTS 3.10.C (ITS 3.9.3) since in the ITS the corresponding Specification no longer requires the reactor mode switch to be locked in Refuel at all times while in MODE 5 and since CTS 3.12.B (ITS 3.10.7) precludes all other CORE ALTERATIONS from taking place.	N/A	3.12.B
A.3	Deletes the current explicit reference to MODE 5 requirements in CTS 3.12.B.1 and 4.12.B.1 for SRM OPERABILITY and Surveillance testing since the reference is redundant to the current and proposed requirements.	N/A	3.12.B.1, 4.12.B.1
A.4	The current requirements for control rod coupling in MODE 5 (CTS 3.3.H) are proposed to be delineated as specific restrictions for SDM in MODE 5 (ITS LCO 3.10.7.c), since they are deleted as normal MODE 5 requirements. This change includes an appropriate ACTION (ITS 3.10.7 ACTION A) and Surveillance (proposed SR 3.10.7.5), consistent with those described in ITS 3.1.3, which governs the MODES 1 and 2 control rod coupling requirements.	LCO 3.10.7.c, 3.10.7 ACTION A, SR 3.10.7.5	3.3.H
A.5	Revises Applicability to clarify actual applicable conditions for the proposed LCO; ITS Applicability now includes "with LCO 3.1.6 not met" since this is the intent of when the LCO is to be used.	3.10.7	3.12.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

A.6	Adds two new Notes in ITS 3.10.7 for clarity. SR 3.10.7.2 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.3 is satisfied for ITS LCO 3.10.7.b.1 requirements, then proposed SR 3.10.7.2 is not required to be met and proposed SR 3.10.7.3 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.2 is satisfied for ITS LCO 3.10.7.b.2 requirements, then SR 3.10.7.3 is not required to be met.	SR 3.10.7.2 Note, SR 3.10.7.3 Note	N/A
A.7	Deletes CTS 3.3.G Action 2.b which provides actions if multiple control rod scram accumulators are inoperable in MODE 5 since the multiple, inoperable withdrawn control rod accumulator requirement is already covered by ITS 3.9.5.	N/A	3.3.G Action 2.b
A.8	Includes APRM requirements of CTS 3/4.1.A in equivalent requirements of ITS 3.10.7.	3.10.7	3/4.1.A
A.9	Modifies the APRM Mode 2 requirements of CTS Tables 3.1.A-1 (including the Actions and Surveillance Requirements) to equivalent MODE 5 requirements in ITS 3.10.7.	3.10.7	3/4.1.A
A.10	Revises CTS 3/4.1.A provided in the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter, dated January 11, 2000.	3.10.7	3/4.1.A
Current Specification 3/4.12.A, Primary Containment Integrity			
NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation			
A.1	Deletes CTS 3/4.12.C from the Dresden 2 and 3 ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter, dated February 23, 2000.	N/A	3/4.12.C

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	4.0	5.0
A.2	Revises the description of the site area boundary.	4.1.1	5.1.A
A.3	Deletes the information that radioactive gaseous effluents and radioactive liquid effluents be located in the OFFSITE DOSE CALCULATION MANUAL.	N/A	5.1.C, 5.1.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
A.1	Editorial changes, reformatting, and revised numbering.	5.1	6.1.A, 6.1.B
	5.2, Organization		
A.1	Editorial changes, reformatting, and revised numbering.	5.2	6.2.A, 6.2.B
A.2	Replaces the term “health physics” with the equivalent term “radiation protection” and replaces the title of the individual qualified to implement radiation protection procedures from “Radiation Protection Technician” to the generic function “radiation protection technician.”	5.2.1.d, 5.2.2.d	6.2.A.4, 6.2.B.4
	5.3, Unit Staff Qualifications		
A.1	Editorial changes, reformatting, and revised numbering.	5.3	6.3
A.2	Deletes the details for qualification requirements of the Shift Technical Advisor (STA) position since they are addressed in the “Commission Policy Statement on Engineering Expertise on Shift” specified in ITS 5.2.2.g.	5.2.2.g	6.3
	5.4, Procedures		
A.1	Editorial changes, reformatting, and revised numbering.	5.4	6.8.A
A.2	Deletes specific requirements for written procedures to implement the Station Security Plan and the Generating Station Emergency Response Plan since they are also required by 10 CFR 50.54(p) and 10 CFR 50, Appendix E.	N/A	6.8.A.3, 6.8.A.4
A.3	Deletes specific requirement for written procedures for ODCM implementation since it is covered by a more generic item, ITS 5.4.1.d, which requires this activity for all Programs and Manuals.	5.4.1.d	6.8.A.6

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

5.5, Programs and Manuals			
A.1	Editorial changes, reformatting, and revised numbering.	5.5	1.0, 4.0.E, 4.7.P, 4.8.D, 3/4.8.H, 3/4.8.J, 4.9.A, 6.8, 6.14
A.2	A statement of applicability of SR 3.0.2 has been added to CTS 6.8.D.1 (ITS 5.5.2), a statement of applicability of SR 3.0.3 has been added to CTS 4.0.E (ITS 5.5.6.c), and a statement of applicability of SR 3.0.2 and SR 3.0.3 has been added to CTS 6.8.D.4 (ITS 5.5.4).	5.5.2, 5.5.6.c, 5.5.4	6.8.D.1, 4.0.E, 6.8.D.4
A.3	Revises wording describing the Radioactive Effluent Controls Program to provide clarity.	5.5.4.d, 5.5.4.f	6.8.D.4.d, 6.8.D.4.f
A.4	Deletes the statement that exempts the requirements of CTS 4.0.B from applying to the frequencies specified in the Primary Containment Leakage Rate Testing Program; the statement is redundant since in the ITS, the ITS Section 3.0 requirements only applies to ITS Sections 3.1 through 3.10.	N/A	6.8.D.5
A.5	Deletes redundant restatement that all applicable requirements must be met.	N/A	4.0.E.4
A.6	Places the filter testing requirements for the Standby Gas Treatment System and the Control Room Emergency Ventilation System in a program, with a general program statement added as ITS 5.5.7. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.7	4.7.P.2, 4.7.P.3, 4.7.P.4, 4.7.P.5, 4.7.P.6, 4.8.D.3, 4.8.D.4, 4.8.D.5, 4.8.D.6, 4.8.D.7
A.7	Revises for clarity the reference to Regulatory Guide 1.52, Revision 2, March 1978 by adding a reference to ANSI/ASME N510-1980 for the in-place charcoal adsorber testing of the Standby Gas Treatment System and Control Room Emergency Ventilation System.	5.5.7	4.7.P.2.a, 4.8.D.3.a

A.8	Places the Offgas Explosive Mixture and Liquid Holdup Tank requirements in a program, with a general program statement added as ITS 5.5.8. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.8	3.8.H, 3.8.J
A.9	Places the diesel fuel oil testing requirements in a program, with a general program statement added as ITS 5.5.9. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.9	4.9.A.5, 4.9.A.6
A.10	Clarifies the Inservice Testing Program requirements by adding a frequency definition of "Every 48 months."	5.5.6	4.0.E
A.11	Added statement that the testing of filter trains following painting, fire, or chemical release is only required if the painting, fire, or chemical release could adversely affect the filter bank or charcoal adsorber capability.	5.5.7	4.7.P.2, 4.8.D.3
5.6, Reporting Requirements			
A.1	Editorial changes, reformatting, and revised numbering.	5.6	Table 3.2.F-1, 6.9
A.2	Requires submittal of reports in accordance with 10 CFR 50.4, versus the CTS requirement that reports be submitted to the Regional Office.	5.6	6.9, 6.9.A.5, 6.9.A.6.c, 6.9.B
A.3	Deletes subtitles of reports since each individual report is named rather than grouped under subtitles.	5.6	6.9
A.4	Allows a single report submittal to satisfy the Occupational Radiation Exposure, Annual Radiological Environmental Operating, and Radioactive Effluent Release reporting requirement for both units.	5.6.1, 5.6.2, 5.6.3	6.9.A.2.a, 6.9.A.3, 6.9.A.4
A.5	Adds another name (electronic dosimeter) for a new type of pocket dosimeter currently in use to estimate the whole body doses required to be reported.	5.6.1	6.9.A.2.a

A.6	Deletes the requirement to report the results of specific activity analysis in which the primary coolant exceeded CTS 3.6.J limits, since it is included in the LER requirements to report fuel cladding failures that exceed expected values or that are caused by unexpected factors, i.e., being seriously degraded.	N/A	6.9.A.2.b
A.7	Requires the Radioactive Effluent Release Report submittal to be "in accordance with 10 CFR 50.36a," in lieu of the current requirement to submit the report “prior to April 1 of each year,” since compliance with 10 CFR 50 requirements is required by the Dresden 2 and 3 Operating Licenses.	5.6.3	6.9.A.4
A.8	Deletes duplicate requirement; i.e., the general statement to submit special reports within the time period specified for each report.	N/A	6.9.B
A.9	Adds a reference to the LHGR limit and the transient linear heat generation rate limit consistent with the limits currently specified in the CORE OPERATING LIMITS REPORT.	5.6.5.a.4	6.9.A.6
A.10	Adds a topical report reference consistent with the Dresden 2 and 3 Technical Specification Change Request submitted to the NRC for approval per ComEd letter JMHLTR #99-0076, dated August 3, 1999.	N/A	6.9.A.6.b
5.7, High Radiation Area			
A.1	Editorial changes, reformatting, and revised numbering.	5.7	6.12
A.2	Replaces the term “health physics” with the equivalent term “radiation protection” and replaces the title of the individual qualified to implement radiation protection procedures from “Radiation Protection Technician” to the generic function “radiation protection technician.”	5.7.1, 5.7.2	6.12.A footnote (a), 6.12.B
Current Specification 6.4, Training			
NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

A.1	Removes the Safety Limit Violation requirements, as they relate to NRC notification and permission to restart the unit, that are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73.	N/A	6.7
Current Specification 6.11, Radiation Protection Program			
NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program			
NONE	NONE	NONE	NONE