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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation.	2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3	2.1.A, 2.1.B, 2.1.C, 2.1.D

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	The statement, "For Frequencies specified as "once," the above interval extension does not apply," was added to clarify that the 1.25 times the interval specified in the Frequency does not apply to certain Surveillances.	SR 3.0.2	4.0.B

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.1.1, SHUTDOWN MARGIN			
NONE	NONE	NONE	NONE
3.1.2, Reactivity Anomalies			
M.1	The CTS requires the reactivity difference between the actual critical control rod configuration and the predicted critical control rod configuration to be within limits. The CTS Bases clarifies that this verification can be performed by one of two methods: by comparison of the critical rod pattern selected base states to the predicted rod inventory at that state (i.e., rod density comparison) or by comparison of the monitored k_{eff} with the predicted k_{eff} as calculated by an approved 3-D core simulator code. These two methods to meet the CTS were previously approved by the NRC. Since Dresden 2 and 3 predicts the core reactivity using a 3-D simulator code and compares predicted k_{eff} with monitored k_{eff}, the alternate approach (i.e., the control rod density comparison) is not necessary and has been deleted.	N/A	3.3.B
3.1.3, Control Rod OPERABILITY			
M.1	Adds a Required Action for a stuck control rod. ITS 3.1.3 Required Action A.1 requires the immediate verification that the stuck control rod separation criteria are met.	3.1.3 Required Action A.1	N/A
M.2	Revises the separation criteria for inoperable control rods to ensure the safety analysis assumptions are met. CTS requires the separation criteria to be met only for withdrawn control rods. ITS 3.1.3 Condition D applies to all inoperable control rods (when $\leq$10% RTP) whether inserted or withdrawn.	3.1.3 Condition D	3.3.C Actions 1.a.1) and 2.a.1)
M.3	If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs.	3.1.3 Required Action A.2	3.3.C Action 1.a.2)a)
M.4	Not Used.	N/A	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.5	Requires control rods to be inserted in lieu of the CTS requirement for "moving," since the purpose of the test is to assure scram insertion capability and restricting the test to only allow control rod insertion provides an increased likelihood of this test detecting a problem that impacts this capability.	SR 3.1.3.2, SR 3.1.3.3	4.3.C.1
M.6	Revises the requirement for non-stuck inoperable control rods, the check of insertion capability is eliminated and is replaced with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 Action D	3.3.C Action 2.a.2)
3.1.4, Control Rod Scram Times			
M.1	Added a requirement requiring a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable (and thus, enabling its withdrawal during a startup). In addition, revises the reactor pressure applicability from > 800 psig to ≥ 800 psig for consistency with the new proposed Surveillance.	SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, SR 3.1.4.4	4.3.D
M.2	Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 12, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered “slow” when the scram time exceeds 7 seconds.	3.1.4, Table 3.1.4-1	3.3.D, 3.3.E, 3.3.F
3.1.5, Control Rod Scram Accumulators			
M.1	Restricts the current 8 hour allowance to restore an inoperable accumulator to apply only when the reactor pressure is greater than or equal to 950 psig, since control rods may not insert on a scram signal at reduced reactor pressures with the associated accumulator inoperable.	3.1.5 ACTION A	3.3.G Action 1.a

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.6, Rod Pattern Control		
M.1	Adds a new Specification requiring the control rod pattern to be in compliance with the analyzed rod position sequence when THERMAL POWER is ≤ 10% RTP in MODES 1 and 2. This ensures the analysis assumptions relative to the Control Rod Drop Accident are maintained.	3.1.6	N/A
	3.1.7, Standby Liquid Control System		
M.1	Revises the requirement to determine the available concentration of sodium pentaborate in solution anytime water or boron is added to the solution or when the system temperature drops below the limits by including a 24 hour time period to complete the determination. This ensures that any potential change to the boron concentration is quickly evaluated.	SR 3.1.7.5	4.4.A.2.b
M.2	Revises the requirement to demonstrate that the pump suction line from the storage tank is not plugged by adding the requirement to perform this Surveillance once within 24 hours after piping temperature is restored within the limits of ITS Figure 3.1.7-2 (CTS Figure 3.4.A-1).	SR 3.1.7.9	4.4.A.4.c
	3.1.8, SDV Vent and Drain Valves		
NONE	NONE	NONE	NONE
	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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO			
M.1	Adds a new surveillance (ITS SR 3.2.2.2) which specifies that the MCPR limits must be determined within 72 hours after each completion of ITS SR 3.1.4.1, SR 3.1.4.2, and SR 3.1.4.4 (control rod scram testing).	SR 3.2.2.2	N/A
3.2.3, LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.4, APRM GAIN AND SETPOINT			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
M.1	Adds a 24 month CHANNEL CALIBRATION Surveillance for the Scram Discharge Volume Water Level - High (Thermal Switch and Float Switch) Functional Unit to ensure the associated channels are calibrated properly.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Functions 7.a and 7.b	N/A
M.2	Modifies the Frequency of the CHANNEL CHECK requirement of CTS Table 4.1.A-1 Functional Unit 4, Reactor Vessel Water Level - Low, from 24 hours to 12 hours to ensure this Function is maintained OPERABLE.	SR 3.3.1.1.1 for Table 3.3.1.1-1 Function 4	4.1.A.1 for Table 4.1.A-1 Functional Unit 4
M.3	Adds a Surveillance to verify the automatic enabling of the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Control Oil Pressure—Low Functions at $\geq$ 45% RTP.	SR 3.3.1.1.14	N/A
A.11	Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).	3.3.1.1 Required Action H.1	Table 3.1.A-1 Actions 13 and 19
	3.3.1.2, SRM Instrumentation		
M.1	Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs on Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since surveillances must be performed at all times, not just prior to control rod withdrawal, the phrase "before withdrawal of control rods" is not needed and has been deleted.	SR 3.3.1.2.4	4.2.G.1

M.2	The CTS Applicability does not require SRMs to be OPERABLE when no more than two fuel assemblies are present in each core quadrant with an SRM when those fuel assemblies are positioned adjacent to that quadrant's SRM. The CTS does however, provide specific criteria to be met if movable detectors are being used. The ITS requires at least two SRM channels to be OPERABLE at all times when in MODE 5 (unless performing a spiral offload or reload), but provides specific allowances in the Note to ITS SR 3.3.1.2.4. to verify OPERABILITY for conditions when the removal of fuel assemblies would not maintain the required count rate.	3.3.1.2, SR 3.3.1.2.4 Note	3.10.B Applicability
M.3	CTS 4.9.2.a.3 requires verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and one is located in the adjacent quadrant. ITS SR 3.3.1.2.2 requires verifying that an OPERABLE SRM detector is located in the fueled region; the core quadrant where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region; and in a core quadrant adjacent to where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region. As a result of providing the additional criteria on where the OPERABLE SRMs must be relocated (one in the fueled region), Note 2 to ITS SR 3.3.1.2.2 is also added to clarify that more than one of the three requirements of ITS SR 3.3.1.2.2 can be satisfied by the same SRM since only two SRMs are required to be OPERABLE.	SR 3.3.1.2.2, including Note 2	4.10.B.1.a
M.4	Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry.	SR 3.3.1.2.7	N/A
M.5	Adds a restriction to determine signal-to-noise ratio and verify it is greater than or equal to 2:1 or 20:1, depending upon the count rate requirement.	SR 3.3.1.2.6, SR 3.3.1.2.5	4.2.G.3, 4.10.B.2
3.3.2.1, Control Rod Block Instrumentation			
M.1	Adds requirements regarding the Reactor Mode Switch—Shutdown Position channels and an associated ACTION and Surveillance Requirement.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7	N/A
M.2	Adds an RBM Surveillance to verify the automatic enabling points of the RBM.	SR 3.3.2.1.5	N/A

M.3	The Note to ITS SR 3.3.2.1.2 will require the RWM to be determined Operable (by performing a CHANNEL FUNCTIONAL TEST) within 1 hour after withdrawal of any control rod when RTP is ≤ 10%, not just when the withdrawal is for the purpose of making the reactor critical.	SR 3.3.2.1.2 Note	3.3.L Applicability footnote (a), 4.3.L.2
M.4	With the RWM inoperable, the CTS allows control rod movement to continue provided a second licensed operator or other qualified member of the technical staff verifies control rod movement is in compliance with the prescribed control rod sequence. In the ITS 3.3.2.1, with the RWM inoperable during a reactor startup, continued movement of control rods will only be allowed if ≥ 12 control rods are withdrawn or if a startup with RWM inoperable has not been performed in the last calendar year.	3.3.2.1 Required Actions C.2.1.1 and C.2.1.2	3.3.L Action
M.5	Adds an RWM Surveillance to verify the automatic enabling point of the RWM.	SR 3.3.2.1.6	N/A
M.6	Adds an RWM Surveillance to verify the bypassing and position of control rods required to be bypassed (taken out of service) in RWM by a second licensed operator or other qualified member of the technical staff.	SR 3.3.2.1.9	N/A
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
M.1	Adds the requirement that the channels be capable of also tripping the main turbine, in lieu of the CTS requirement that they trip the feedwater system only. The Specification title, LCO and Required Actions have been modified to reflect this change.	3.3.2.2	3/4.2.J
M.2	Adds a requirement to ensure the trip of the feedwater pump breakers and closure of the turbine stop valves, since the LOGIC SYSTEM FUNCTIONAL TEST definition does not require the actuation of the components.	SR 3.3.2.2.5	N/A
M.3	Not used.	N/A	N/A
M.4	Increases the Frequency of the CHANNEL CHECK and CHANNEL FUNCTIONAL TEST requirements for the Reactor Vessel Water Level — High Functional Unit from 24 hours to 12 hours and from 18 months to 92 days, respectively.	SR 3.3.2.2.1, SR 3.3.2.2.2	4.2.J.1 for Table 4.2.J-1 Functional Unit
M.5	Adds a Surveillance to calibrate the trip units of the Reactor Vessel Water Level — High Function every 92 days.	SR 3.3.2.2.3	N/A

3.3.3.1, Post Accident Monitoring Instrumentation			
M.1	Adds requirements for the Penetration Flow Path Primary Containment Isolation Valve (PCIV) Position Function, since this Function is a Category 1 instrument for Dresden 2 and 3.	Table 3.3.3.1-1 Function 6, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.5	N/A
A.3	The Reactor Vessel Water Level instrumentation in CTS Table 3.2.F-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "medium range" covering approximately 83 inches above the top of active fuel to approximately 203 inches above the top of active fuel; and "fuel zone (wide range)" covering approximately 203 inches above the top of active fuel to approximately 197 inches below the top of active fuel. Currently, CTS Table 3.2.F-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Reactor Vessel Water Level - Fuel Zone (Wide Range)) and Function 2.b (Reactor Vessel Water Level - Medium Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1 Functions 2.a and 2.b	Table 3.2.F-1 Instrumentation 2
3.3.4.1, ATWS-RPT Instrumentation			

M.1	The ATWS-RPT trip logic uses a two-out-of-two logic for each trip Function in both trip systems. The reactor recirculation pumps will trip when one trip system actuates. Therefore, when a channel associated with one Trip Function (e.g., Reactor Water Level - Low Low) is inoperable in both trip systems, the ATWS-RPT trip capability is lost for that Function. Similarly, if channels associated with both Trip Functions are inoperable in both trip systems, the ATWS-RPT trip capability is lost for both ATWS-RPT trip Functions. CTS 3.2.C Actions 2 and 4 address the condition with channels inoperable in both trip systems. Under these conditions the ATWS-RPT trip capability is lost for one and two Trip Functions, respectively. In the ITS, these conditions will require entry into proposed ITS 3.3.4.1 ACTION B and ACTION C, respectively. The ITS Completion Times (72 hours and 1 hour, respectively) are consistent with the current actions for loss of trip function capability in CTS 3.2.C Actions 5 and 6, respectively, but more restrictive than CTS 3.2.C Actions 2 and 4 which give a 14 day repair completion time.	3.3.4.1 ACTIONS B and C	3.2.C Actions 2 and 4
M.2	Adds a Note to ITS 3.3.4.1 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note will ensure the functional capability of the ATWS-RPT System is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.1 Required Action A.2 Note	3.2.C Action 2
3.3.5.1, ECCS Instrumentation			
M.1	Eight additional Functions have been added. The automatic actuation function of the ECCS subsystems ensure the design basis events can be satisfied. These Functions are included in ITS Table 3.3.5.1-1 as follows: 1) Function 1.e, Core Spray Pump Start - Time Delay Relay; 2) Function 2.d, Reactor Steam Dome Pressure - Low (Break Detection); 3) Function 2.e, LPCI Pump Start - Time Delay Relay for Pumps B and D; 4) Function 2.g, Recirculation Pump Differential Pressure-High (Break Detection); 5) Function 2.h, Recirculation Riser Differential Pressure-High (Break Detection); 6) Function 2.i, Recirculation Pump Differential Pressure Time Delay-Relay (Break Detection); 7) Function 2.j, Reactor Steam Dome Pressure Time Delay-Relay (Break Detection); and 8) Function 2.k, Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection). Appropriate ACTIONS and Surveillances have also been added.	Table 3.3.5.1-1 Functions 1.e, 2.d, 2.e, 2.g, 2.h, 2.i, 2.j, and 2.k	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

M.2	Adds a maximum Allowable Value for the CS Pump Discharge Flow—Low (Bypass) Function to ensure the valves will close to provide assumed ECCS flow to the core.	Table 3.3.5.1-1 Function 1.d	Table 3.2.B-1 Functional Unit 1.d
M.3	Adds a CHANNEL CALIBRATION Surveillance for the Suppression Chamber Water Level – High Function to ensure the instrument channels trip at the specified setpoint.	SR 3.3.5.1-5	N/A
M.4	Not used.	N/A	N/A
M.5	Not used.	N/A	N/A
M.6	Not used.	N/A	N/A
M.7	Not used.	N/A	N/A
M.8	Adds an additional channel for the HPCI Reactor Vessel Water Level - High Function, since the Trip System includes two channels, and both channels must function for the trip system to complete the appropriate logic.	Table 3.3.5.1-1 Function 3.c	Table 3.2.B-1 Functional Unit 3.e
3.3.5.2, IC System Instrumentation			
M.1	Adds a time delay Allowable value for the Reactor Vessel Pressure—High Function.	SR 3.3.5.2.3	N/A
3.3.6.1, Primary Containment Isolation Instrumentation			
M.1	An Allowable Value has been added for the Main Steam Line Low Pressure—Timer Function. This Function delays initiation of the Main Steam Line Pressure—Low Function.	Table 3.3.6.1-1 Function 1.c	N/A
M.2	Provides the actual number of channels for the SLCS Initiation Function, in lieu of the CTS "NA."	Table 3.3.6.1-1 Function 5.a	Table 3.2.A-1 Functional Unit 4.a
M.3	Not used.		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

M.4	Increases the Surveillance Frequency from 18 months to 92 days for performing the CHANNEL CALIBRATION of the Main Steam Line Flow — High Function.	SR 3.3.6.1.4	4.2.A.1 for Table 4.2.A-1 Functional Unit 3.d
3.3.6.2, Secondary Containment Isolation Instrumentation			
M.1	Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include CORE ALTERATIONS.	Table 3.3.6.2-1 footnote (b)	Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d
M.2	Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include operations with the potential for draining the reactor vessel (OPDRVs).	Table 3.3.6.2-1 footnote (a)	Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d
3.3.6.3, Relief Valve Instrumentation			
M.1	Adds an Allowable Value for the Low Set Relief Valves Reactuation Time Delay Function to ensure the OPERABILITY of the low set relief function.	Table 3.3.6.3-1 Function 1.b	3.6.F, 4.6.F.1
M.2	Increases the Surveillance Frequency from 18 months to 92 days for performing the CHANNEL CALIBRATION of the Low Set Relief Valves Reactor Vessel Pressure Setpoint and Relief Valves Reactor Vessel Pressure Setpoint Functions.	SR 3.3.6.3.1	4.6.F.1.b
3.3.7.1, CREV System Instrumentation			

M.1	Adds new Specification requiring the Control Room Emergency Ventilation System instrumentation to be OPERABLE to support actions to place the Control Room Emergency Ventilation System in the pressurization mode of operation.	3.3.7.1	N/A
3.3.8.1, Loss of Power Instrumentation			
M.1	The CTS requires the LOP instruments to be OPERABLE during MODES 4 and 5 only when the associated DG is required to be OPERABLE. In the ITS, the Applicability is being changed to be when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources — Shutdown," which requires the LOP instrumentation to be OPERABLE not only during MODES 4 and 5, but also during movement of irradiated fuel assemblies in the secondary containment.	3.3.8.1 Applicability	Table 3.2.B-1 footnote (e), Table 4.2.B-1 footnote (c)
M.2	Adds a maximum Allowable Value for the Degraded Voltage Function to prevent an inadvertent power supply transfer.	Table 3.3.8.1-1 Function 2.a	Table 3.2.B-1 Functional Unit 6.b
M.3	CTS allows a loss of Power Instrumentation channel to be inoperable to perform surveillances and not enter the required Actions fro 6 hours provided the Functional Unit maintains actuation capability. ITS will allow only this exception for 2 hours.	3.3.8.1 Surveillance Note 2	3.2.B.1 Note (a)
3.3.8.2, RPS Electric Power Monitoring			
M.1	Not used.	N/A	N/A
M.2	Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS logic electric power monitoring assemblies.	SR 3.3.8.2.2	N/A
Current Specification 3/4.2.H, Explosive Gas Monitoring			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.4.1, Recirculation Loops Operating			
M.1	Decreases the total time required to be in MODE 3 from 14 to 12 hours.	3.4.1 Required Actions A.1 and A.2	3.6.A Action 2
3.4.2, Jet Pumps			
M.1	Deletes a method of demonstrating jet pump OPERABILITY, the number of acceptable methods for demonstrating OPERABILITY is reduced.	N/A	4.6.B.1.b, 4.6.B.2.b
3.4.3, Safety and Relief Valves			
M.1	Adds a plant specific requirement that 8 safety valves shall be OPERABLE. Since this change proposes to include a specific number of required safety valves in the ITS, the number of valves will no longer be controlled by ComEd, subject to the provisions of 10 CFR 50.59. Instead, the number of required safety valves will be controlled by the NRC, pursuant to 10 CFR 50.90.	LCO 3.4.3	N/A
3.4.4, RCS Operational Leakage			
NONE	NONE	NONE	NONE
3.4.5, RCS Leakage Detection Instrumentation			
M.1	Adds the requirement for a CHANNEL FUNCTIONAL TEST to be performed on the drywell floor drain sump monitoring system on a 31 day frequency to ensure the monitor can perform its function and verifies the relative accuracy of the instrument string.	SR 3.4.5.1	N/A

M.2	Increases the Frequency of the CHANNEL CALIBRATION requirement for CTS 4.6.G.2, Drywell Floor Drain Sump Monitoring System from 18 months to 12 months (proposed ITS SR 3.4.5.2).	SR 3.4.5.2	4.6.G.2
3.4.6, RCS Specific Activity			
NONE	NONE	NONE	NONE
3.4.7, Shutdown Cooling System - Hot Shutdown			
NONE	NONE	NONE	NONE
3.4.8, Shutdown Cooling System - Cold Shutdown			
NONE	NONE	NONE	NONE
3.4.9, RCS Pressure and Temperature (P/T) Limits			
M.1	Adds specific temperature limits which establish the conditions for startup of an idle recirculation loop. Since this change proposes to include specific limit values in the ITS, the limits will no longer be administratively controlled by ComEd, subject to the provisions of 10 CFR 50.59. Instead, the limits will be controlled by the NRC, pursuant to 10 CFR 50.90.	SR 3.4.9.3, SR 3.4.9.4	N/A
M.2	Deletes the CTS 3.6.D footnote a allowance that the differential temperature between the reactor pressure vessel steam space coolant and the bottom head drain line coolant is not applicable below 25 psig reactor pressure.	N/A	3.6.D footnote a
3.4.10, Reactor Steam Dome Pressure			

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

M.1	Deletes footnote that states that the reactor steam dome pressure limit is not applicable during anticipated transients.	N/A	3.6.L footnote (a)
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		
M.1	Revises CTS 3.5.A.2, which requires the low pressure coolant injection (LPCI) subsystem to be OPERABLE and comprised of four OPERABLE LPCI pumps and an OPERABLE flow path capable of taking suction from the suppression chamber and transferring the water to the reactor vessel, to require each ECCS injection subsystem to be OPERABLE. The Bases describes the OPERABILITY requirements for LPCI. There are two LPCI subsystems, each consisting of two motor driven pumps, piping and valves capable of transferring water from the suppression pool to the RPV via the "selected" recirculation loop. Since the CTS only requires that LPCI be able to transfer water to the reactor vessel this change is considered more restrictive on plant operation, however necessary to ensure assumptions of the design basis accidents can be satisfied. In addition, 1) revises the allowance in CTS 3.5.A Action 2.b which allows the entire LPCI System to be inoperable for 7 days to allow only one LPCI subsystem to be inoperable (first part of ITS 3.5.1, Condition B) or one LPCI pump in each LPCI subsystem (second part of ITS 3.5.1 Condition C) to be inoperable; and 2) adds a new Action (ITS 3.5.1 Action D) which allows the entire LPCI System to be inoperable (i.e., both LPCI subsystems inoperable), however the Completion Time associated with this ACTION has been reduced to 72 hours.	3.5.1, 3.5.1 Conditions B and C, 3.5.1 Action D	3.5.A.2, 3.5.A.Action 2.b
M.2	Adds 1) ITS SR 3.5.1.3 requiring the verification of correct breaker alignment to the LPCI swing bus every 31 days; 2) ITS SR 3.5.1.4 requiring the verification that each recirculation pump discharge valve cycles through one complete cycle of full travel or is de-energized in the closed position; 3) ITS SR 3.5.1.11 requiring alternate verification of the automatic transfer capability of the LPCI swing bus power supply from its normal power source to its backup power source.	SR 3.5.1.3, SR 3.5.1.4, SR 3.5.1.11	N/A
M.3	Revises CTS 3.5.A Action 1.b requiring a normal plant shutdown with both CS subsystems inoperable and CTS 3.5.A Action 2.c requiring a normal plant shutdown with the LPCI subsystem and one or both CS subsystems inoperable to requiring entry into LCO 3.0.3.	3.5.1 ACTION J	3.5.A Action 1.b, 3.5.A Action 2.c
M.4	Revises the CTS 4.5.A.3.b.1) requirement for steam supply pressure to be $\leq$ 180 psig consistent with requirements at Quad Cities.	SR 3.5.1.7	4.5.A.3.b.1)

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

3.5.2, ECCS-Shutdown			
M.1	Revises CTS 4.5.B to require explicit values of flow (4500 gpm) and system head corresponding to reactor pressure (20 psig).	SR 3.5.2.4	4.5.B
M.2	Deletes the allowance to not require the suppression pool to be OPERABLE during cavity flooding.	N/A	3.5.C.2 footnote (a), 3.5.C Action 2 footnote (a)
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 8 hours (initiating the actions as soon as possible).	3.5.2 ACTION D	3.5.B Action 2, 3.5.C Action 2
3.5.3, IC System			
M.1	Revises CTS 4.5.D.4 to specify acceptance criteria of removal of the design heat load.	SR 3.5.3.4	4.5.D.4
M.2	Revises CTS 4.5.d.1 to specify the shell side water volume and shell side water temperature acceptance limits	SR 3.5.3.1	4.5.D.1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.1, Primary Containment			
NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock			
L.2	In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS. The CTS does not specify a time limit to verify closure.	3.6.1.2 Required Actions A.1 and C.2	3.7.C Actions 1.a and 3
M.1	Adds a Required Action to verify an OPERABLE door is closed in the air lock within 1 hour when the primary containment air lock interlock mechanism is inoperable. The 1 hour is allowed to complete the verification since the level of degradation associated with the CTS Actions is no worse than that allowed for when Primary Containment Integrity (CTS 3.7.A) is not maintained.	3.6.1.2 Required Action B.1	N/A
M.2	CTS 3.7.C Action 2 (for an inoperable primary containment air lock interlock mechanism) does not include a default Action (be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours) consistent with other Actions in CTS 3.7.C. Therefore, for an inoperable primary containment air lock interlock mechanism, CTS LCO 3.0.C must be entered and the plant must be in MODE 3 in 13 hours and MODE 4 in 37 hours. ITS 3.6.1.2 ACTION D is proposed to be added as the default action which will require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours. Since this change will require the plant to be in MODE 3 and 4 in less time (i.e., 1 hour), this change is considered more restrictive on plant operation.	3.6.1.2 Action D	3.0.C 3.7.c Action 2
3.6.1.3, Primary Containment Isolation Valves			

M.1	Adds a new Applicability of “when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability, 3.6.1.3 ACTION F	N/A
M.2	Adds a new Surveillance Requirement that verifies the 18 inch vent and purge valves, except the torus purge valves, are closed every 31 days except during operations which require them to be open (inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, and Surveillances that require the valves to be open).	SR 3.6.1.3.1	N/A
3.6.1.4, Drywell Pressure			
NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature			
M.1	Adds a new Specification requiring drywell average air temperature to be $\leq$150°F during operations in MODES 1, 2, and 3, since the accident analyses of UFSAR, Section 6.2 assumes this temperature as an initial condition in the containment analysis. Appropriate ACTIONS and a Surveillance Requirement are also added.	3.6.1.5, 3.6.1.5 ACTIONS A and B, SR 3.6.1.5.1	N/A
3.6.1.6, Low Set Relief Valves			
NONE	NONE	NONE	NONE
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers			
M.1	Reduces the time to verify that at least one vacuum breaker in the line is closed if it is determined that one vacuum breaker is not closed (otherwise inoperable) from 2 hours to 1 hour, consistent with the Primary Containment Specification, ITS 3.6.1.1.	3.6.1.7 ACTION B	3.7.F Action 2

3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers			
M.1	CTS 3.7.E Action 1 allows “one or more” of the required suppression chamber-to-drywell vacuum breakers to be inoperable for opening. However, the current accident analysis does not allow two or more vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.C must be entered. Therefore, ITS 3.6.1.8 ACTION A ensures that only one vacuum breaker can be inoperable for opening, and if more than one is inoperable for opening, ITS LCO 3.0.3 will continue to be entered.	3.6.1.8 ACTION A	3.7.E Action 1
3.6.2.1, Suppression Pool Average Temperature			
M.1	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 200 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the CTS 4.7.K.2.c requirement that the 30 minute temperature verification after a scram is required only with the main steam line isolation valves closed has been deleted, since the temperature verification, (as modified by DOC L.2 of ITS 3.6.2.1) is now required at all times following a scram.	3.6.2.1 ACTION E	3.7.K.2.c, 4.7.K.2.c
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 150 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS D and E	3.7.K.2.b, 3.7.K.2.c, 3.7.K Actions 4 and 5
3.6.2.2, Suppression Pool Water Level			
NONE	NONE	NONE	NONE

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

3.6.2.3, Suppression Pool Cooling			
M.1	Adds a specific value for verification of the required LPCI pump flow when in the suppression pool cooling mode, which ensures primary containment peak pressure and temperature can be maintained below the design limits during a DBA.	SR 3.6.2.3.2	4.7.M.2
3.6.2.4, Suppression Pool Spray			
M.1	Adds a Surveillance Requirement that verifies each suppression pool spray nozzle is unobstructed every 5 years, which ensures that when a suppression pool spray subsystem is required per its design function that it will perform as designed.	SR 3.6.2.4.2	N/A
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure			
M.1	The Applicability for CTS 3.7.H ends 24 hours prior to reducing THERMAL POWER to $\leq$ 15% RTP preliminary to a scheduled reactor shutdown. The Applicability for ITS 3.6.2.5 will end 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor shutdown. Thus, the Applicability for ITS 3.6.2.5 lasts slightly longer than the current Applicability (since < 15% RTP is reached slightly after $\leq$ 15% RTP is reached).	3.6.2.5 Applicability	3.7.H Applicability
3.6.3.1, Primary Containment Oxygen Concentration			
NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment			
M.1	Requires both subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires that one subsystem be tested every 18 months; however, the same SGT subsystem could be tested at each testing occurrence.	SR 3.6.4.1.3	4.7.N.3

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

M.x	Adds a Surveillance that requires verifying secondary containment equipment and blowout hatches are closed and sealed every 24 months.	SR 3.6.4.1.3	4.7.N.2.b
3.6.4.2, Secondary Containment Isolation Valves			
M.1	Adds a Surveillance that requires the isolation time of each power operated, automatic SCIV to be verified within limits, which provides assurance that the secondary containment isolation valves will function and the secondary containment will perform as assumed in the safety analyses.	SR 3.6.4.2.2	N/A
M.2	CTS 4.7.N.2.b requires all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions to be closed. This can be met by a single manual valve being closed. CTS 3.7.O requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.7.O does not prescribe limitations on manual valves. ITS LCO 3.6.4.2 requires each SCIV to be OPERABLE and proposed SR 3.6.4.2.1 requires the verification that each secondary containment isolation manual valve and blind flange that is not locked sealed or otherwise secured and is required to be closed during an accident is closed. This provides assurance that the position of all secondary containment isolation valves and blind flanges are properly controlled to ensure design basis assumptions are met.	LCO 3.6.4.2 SR 3.6.4.2.1	4.7.N.2.b
3.6.4.3, Standby Gas Treatment System			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.7.1, Containment Cooling Service Water System			
NONE	NONE	NONE	NONE
3.7.2, Diesel Generator Cooling Water System			
M.1	Since an opposite unit DG is required by ITS 3.8.1, the LCO statement has been modified to clearly require the opposite unit DGCW subsystem that provides cooling to the opposite unit DG.	3.7.2	3.8.B
3.7.3, Ultimate Heat Sink			
NONE	NONE	NONE	NONE
3.7.4, Control Room Emergency Ventilation System			
NONE	NONE	NONE	NONE
3.7.5, Control Room Emergency Ventilation Air Conditioning System			
NONE	NONE	NONE	NONE
3.7.6, Main Condenser Offgas			
M.1	Changes the amount of increase requiring verification that the release rate of the sum of noble gases measured prior to the holdup line is within limits following an increase from > 50% to include an increase equivalent to 50%.	SR 3.7.6.1	4.8.I.2.b

3.7.7, Main Turbine Bypass System			
M.1	Adds ITS 3.7.7, "Main Turbine Bypass System," which will require the Main Turbine Bypass System to be OPERABLE or an MCPR penalty to be applied, to help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting MCPR if the event were to occur.	3.7.7	N/A
3.7.8, Spent Fuel Storage Pool Water Level			
M.1	The CTS requires the spent fuel water level to be maintained at a level of $\geq$ 33 ft. The ITS requires the spent fuel storage pool water level to be $\geq$ 19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks, which is approximately a 9 inch increase in the water level requirement.	3.7.8	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 M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources - Operating		
M.1	Adds two additional AC sources to the minimum requirements in CTS 3.9.A for AC Sources - Operating. The requirements were added to ensure the appropriate AC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.1.c and LCO 3.8.1.d. LCO 3.8.1.c will require one qualified circuit between the offsite transmission network and the opposite unit's Division 2 onsite Class 1E AC electrical power distribution subsystem(s) and LCO 3.8.1.d will require the opposite unit's DG, each capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), and LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only). These added requirements are necessary since safety related equipment is shared between both units. Due to these additions, two notes have been added. The first Note has been added to the Applicability and allows the opposite unit's AC electrical power sources in LCO 3.8.1.c and d to not be required when the associated equipment is inoperable. The second Note has been added to the ACTIONS and excludes the applicability of LCO 3.0.4 for inoperable opposite unit AC electrical power sources. In addition, since the Specification has been prepared for both units consistent with CTS, two Notes have been added to the Surveillance Requirements (ITS Surveillance Requirements Notes 1 and 2) to clearly define the applicability of the Surveillances to both units. An additional Surveillance (SR 3.8.1.21) has also been added to ensure the opposite unit's power sources are properly tested.	LCO 3.8.1.c, LCO 3.8.1.d, 3.8.1 Applicability Note, 3.8.1 ACTIONS Note, Surveillance Requirements Notes 1 and 2, SR 3.8.1.21	N/A
M.2	Adds two Required Actions to cover the situation when an offsite circuit is inoperable concurrent with a "redundant required feature." These Required Actions are similar to those required when a DG and a system, subsystem, train, component, or device are concurrently inoperable (CTS 3.9.A Action 4). Limiting these situations to 24 hours when one offsite circuit is inoperable (ITS 3.8.1 Required Action A.2) and 12 hours when both offsite circuits are inoperable (ITS 3.8.1 Required Action C.1) will ensure that the necessary equipment remains powered to meet the UFSAR.	3.8.1 Required Actions A.2 and C.1	N/A
M.3	Adds a Note that requires SR 3.8.1.3 (the DG load Surveillance) to be immediately preceded by a successful performance of SR 3.8.1.2 (the DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test.	SR 3.8.1.3 Note 4	N/A

M.4	Adds limitations on the operating power factor for the 24-hour run. The actual power factor values have been added to the Bases. A Note has been also added to ensure a momentary transient that results in the power factor not being met does not invalidate the 24 hour run.	SR 3.8.1.15, including Notes 1 and 2	4.9.A.8.h
M.5	Provides an upper steady state voltage limit of 4368V and a lower voltage limit (both steady state and initial startup) of 3952V. The proposed change conservatively reduces the DG allowable voltage limits from +/- 10% to +/- 5%.	SR 3.8.1.2, SR3.8.1.8, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19	4.9.A.2.c, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.d.2), 4.9.A.8.e, 4.9.A.8.f.2)
M.6	Not used.	N/A	N/A
M.7	Not used.	N/A	N/A
M.8	Changes the CTS 4.9.A.8.h requirement for a slow restart of each DG after the diesel has been loaded for a period of time to a fast restart. The changed requirement will require the verification that each DG starts and achieves in $\leq$ 13 seconds, voltage $\geq$ 3952 and frequency $\geq$ 58.8 Hz; and steady state voltage of $\geq$ 3952 V and $\leq$ 4368 V and frequency $\geq$ 58.8Hz and $\leq$ 61.2 Hz.	SR 3.8.1.16	4.9.A.8.h
M.9	If CTS 4.9.A.8.h (the DG restart test portion) fails after the performance of the 24 hour DG load test, CTS 4.9.A.8.h footnote (f) allows the DG to be operated at "approximately" full load for 2 hours or until the operating temperature has stabilized. The ITS provides an explicit load limit of $\geq$ 2340 kW and specifies that the DG operate for $\geq$ 2 hours at this load. The load limit is 90% of the continuous rating of the DG, consistent with the minimum load proposed for the monthly DG test, and the 2 hour time limit at this load ensures operating temperatures are stabilized. In addition, due to the addition of an explicit load limit, an allowance has been provided to allow momentary transients below the 2340 kW load limit to not invalidate the 2 hour run requirement.	SR 3.8.1.16, including Note 1	4.9.A.8.h, including footnote (f)
M.10	Requires the minimum voltage for the 10 year DG simultaneous start test to be 3952 V within 13 seconds; whereas the CTS does not provide a minimum voltage the DGs must attain within the 13 second DG start time assumed in the accident analysis.	SR 3.8.1.20	4.9.A.9
3.8.2, AC Sources - Shutdown			

M.1	Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require them capable of supplying power to necessary electrical power distribution subsystems, if one or more subsystems are not capable of being powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering. To ensure conservative actions, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is also added.	LCO 3.8.2.a, 3.8.2 Required Action A.1	3.9.B.1
M.2	Requires the single unit DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what Division that DG must be associated with.	LCO 3.8.2.b	3.9.B.2
M.3	When a required offsite circuit or a unit DG is inoperable, the actions imposed by CTS 3.9.B Action 2 do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.9.B is not applicable. Therefore, ITS 3.8.2 Required Actions A.2.4 and B.4 are being added, which implement a requirement to immediately initiate action to restore the required power sources to OPERABLE status.	3.8.2 Required Actions A.2.4 and B.4	N/A
3.8.3, Diesel Fuel Oil and Starting Air			
NONE	NONE	NONE	NONE
3.8.4, DC Sources - Operating			
M.1	Deletes the CTS 4.9.C.6 allowance to replace or restore the battery to 100% or greater of manufacturer's rated capacity during the next refuel outage, for a battery that has shown signs of degradation or reached 85% service life and delivers a capacity of less than 100% of manufacturer's rated, in lieu of performing either a performance discharge test or a modified performance test to verify battery capacity every 12 months.	N/A	4.9.C.6

M.2	Adds an additional DC source to the minimum requirements in CTS 3.9.C for DC Sources - Operating. The requirement was added to ensure the appropriate DC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirement was added as LCO 3.8.4.c. LCO 3.8.4.c will require the opposite unit's 125 VDC electrical power subsystem capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." This added requirement is necessary since safety related equipment is shared between both units. An Action (ITS 3.8.4 ACTION G) has been added, which requires the restoration of the opposite unit's electrical power subsystems to OPERABLE status within 7 days.	LCO 3.8.4.c, 3.8.4 ACTION G	N/A
M.3	Deletes the CTS 4.9.C.2.b and 4.9.C.3.c provisions which allow the battery terminal and connector resistance to be $\leq$ 20% above the baseline connection resistance, in lieu of demonstrating that the measured battery terminal and connector resistance is $\leq 150 \times 10^{-6}$ ohms.	N/A	4.9.C.2.b, 4.9.C.3.c
3.8.5, DC Sources - Shutdown			
M.1	Not used.	N/A	N/A
M.2	The CTS 3.9.D, "DC Sources — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.5 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.5 ACTIONS Note	N/A
M.3	In the event the necessary DC sources are not OPERABLE, ITS 3.8.5 Required Action A.2.4 is added to commence and continue attempts to restore the necessary DC sources, resulting in an action that does not allow continued operation in the existing plant conditions. This has the effect of not allowing MODE changes per ITS LCO 3.0.4 .	3.8.5 Required Action A.2.4	N/A

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

3.8.6, Battery Cell Parameters			
M.1	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	3.9.C Actions 4 and 5
M.2	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.9.C-1 footnote (c)
M.3	Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float change following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance.	Table 3.8.6-1 footnote (c)	Table 4.9.C-1 footnote (b)
M.4	Changes the Float Voltage Allowable Value (Category C) from $\geq$ 2.07 volts for each connected cell to > 2.07 volts for each connected cell, consistent with the recommendation identified in IEEE-450-1995, Annex C, C.1 Note.	Table 3.8.6-1 Category C	Table 4.9.C-1 Category B Allowable Value
3.8.7, Distribution Systems - Operating			
M.1	Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.7.a to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.7.a." CTS does not provide this restriction.	3.8.7 ACTIONS A, and B	N/A
M.2	Adds an action that requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution, in combination, subsystems results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems.	3.8.7 ACTION E	N/A

M.3	Adds additional AC and DC distribution subsystems have been added to the minimum requirements in CTS 3.9.E for Distribution - Operating. The requirement was added to ensure the appropriate AC and DC distribution subsystems are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.7.b. LCO 3.8.7.b will require the opposite unit's AC and DC electrical power distribution subsystems capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." These added requirements are necessary since safety related equipment is shared between both units. An Action (ITS 3.8.7 ACTION C) has been added, which requires the restoration of the opposite unit's required electrical power distribution subsystems to OPERABLE status within 7 days. In addition, ITS 3.8.7 ACTION C includes a Note to enter applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit.	LCO 3.8.7.c, ACTION C	N/A
3.8.8, Distribution Systems - Shutdown			
M.1 Open	Adopting TSTF-204 may result in changes to this M-DOC. ITS 3.8.8 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. The CTS 3.9.F Action has been modified to be "one or more required" instead of the current "less than," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem.	LCO 3.8.8, 3.8.8 Required Action A.1	LCO 3.9.F, 3.9.F Action

M.2	The CTS 3.9.F, "Distribution — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.8 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.8 ACTIONS Note	N/A
M.3	In the event the necessary Division 1, 2, or 3 electrical power distribution subsystems are not Operable, ITS 3.8.8 Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. ITS 3.8.8 Required Action A.2.5 is also added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.8 ACTIONS are required when shutdown cooling is inoperable.	3.8.8 Required Actions A.2.4 and A.2.5	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
M.1	Adds the service platform hoist fuel loaded interlock to the list of refueling interlocks since the service platform hoist can be operated over the reactor core during refueling and the design includes a hoist loaded interlock that assures no control rod is withdrawn when fuel is being loaded into the reactor.	SR 3.9.1.1	3.10.A.2
	3.9.2, Refuel Position One-Rod-Out Interlock		
NONE	NONE	NONE	NONE
	3.9.3, Control Rod Position		
NONE	NONE	NONE	NONE
	3.9.4, Control Rod Position Indication		
M.1	Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.3.I Action 3 for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The ITS ACTIONS require that fuel movement and control rod withdrawal be suspended and all insertable control rods in core cells containing fuel assemblies be fully inserted, or alternatively, that the control rod be fully inserted and disarmed. Also, a Completion Time has been added to specify that the Required Action be completed "immediately."	3.9.4, 3.9.4 ACTION A	3.3.I, 3.3.I Action 3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.5, Control Rod OPERABILITY - Refueling			
M.1	Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram).	3.9.5, 3.9.5 ACTION A, SR 3.9.5.1	N/A
3.9.6, RPV Water Level - Irradiated Fuel			
NONE	NONE	NONE	NONE
3.9.7, RPV Water Level - New Fuel or Control Rods			
NONE	NONE	NONE	NONE
3.9.8, Shutdown Cooling (SDC) - High Water Level			
NONE	NONE	NONE	NONE
3.9.9, Shutdown Cooling (SDC) - Low Water Level			
M.1	Requires the following actions to be immediately initiated if an alternate method of decay heat removal is not verified: 1) restore secondary containment to OPERABLE status ; 2) restore one SGT subsystem to OPERABLE status; and 3) restore isolation capability in each required secondary containment penetration flowpath not isolated. These requirements will ensure the secondary containment boundary is intact to filter any release in the unlikely case the loss of shutdown cooling results in a release of fission products.	3.9.9 ACTION B	N/A
Current Specification 3/4.10.E, Communications			

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.1, Reactor Mode Switch Interlock Testing			
M.1	Adds an appropriate ACTION to identify the Required Actions and Completion Times for noncompliance with Special Operations ITS 3.10.1. Also, Surveillance Requirements are added to provide increased assurance of continued compliance with Special Operations ITS 3.10.1.	3.10.1 ACTION A, SR 3.10.1.1, SR 3.10.1.2	N/A
3.10.2, Single Control Rod Withdrawal - Hot Shutdown			
M.1	Adds additional restrictions to ensure 1) an OPERABLE RPS SDV trip and an OPERABLE control rod, or to appropriately preclude the possibility of a local reactivity excursion; 2) the IRM, Reactor Mode Switch Shutdown Position, and Manual Scram RPS Functions of ITS 3.3.1.1; 3) the control rod position indication must be OPERABLE to support the one-rod-out interlock; and 4) all other control rods must be fully inserted. Furthermore, an ACTION and Surveillance Requirements are also provided in the proposed presentation for these allowances.	LCO 3.10.2 Item b, LCO 3.10.2 Item c, LCO 3.10.2 Item d.1, LCO 3.10.2 Item d.2,	N/A
3.10.3, Single Control Rod Withdrawal - Cold Shutdown			
M.1	If CTS 3.10.I is not met and the withdrawn control rod is insertable, two additional Required Actions are provided in ITS 3.10.3 ACTION A. ITS 3.10.3 Required Action A.2.1 requires action to be initiated immediately to fully insert all insertable control rods. ITS 3.10.3 Required Action A.2.2 requires the placing of the reactor mode switch to the Shutdown position, which will preclude withdrawal of any control rod. If CTS 3.10.I is not met and the withdrawn control rod is not insertable, an additional Required Action, ITS 3.10.3 Required Action B.2.1, will require action to be initiated immediately to fully insert all control rods.	3.10.3 Required Actions A.2.1, A.2.2, and B.2.1	3.10.I
M.2	CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, the ITS applies an additional restriction to ensure the control rod position indication is OPERABLE (required to support the one-rod-out interlock).	LCO 3.10.3.b.1	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.4, Single Control Rod Drive Removal - Refueling			
M.1	Inputs to the one-rod-out interlock (rod position on the rod to be removed) must be overridden to remove the rod; thus, the one-rod-out interlock is not OPERABLE in this condition. To ensure only one rod is withdrawn, a new requirement that a control rod block is inserted has been added. This compensates for the inoperable one-rod-out interlock. To ensure no fuel is loaded (since refueling interlocks would preclude fuel movement with a withdrawn control rod), a new requirement that no other CORE ALTERATIONS can be in progress has been added. Surveillances have been added to verify a control rod withdrawal block is inserted every 24 hours and no other CORE ALTERATIONS are in progress every 24 hours.	LCO 3.10.4.c, LCO 3.10.4.d, SR 3.10.4.3, SR 3.10.4.5	N/A
3.10.5, Multiple Control Rod Withdrawal - Refueling			
M.1	Adds a restriction on fuel assembly movement within the reactor pressure vessel with control rods withdrawn that only allows fuel to be loaded in an approved spiral reload sequence. An Action is provided to suspend fuel loading when the LCO is not met. In addition, adds a new Surveillance Requirement to verify, every 24 hours, fuel assemblies being loaded are in compliance with an approved spiral reload sequence.	LCO 3.10.5.c, 3.10.5 Required Action A.2, SR 3.10.5.3	N/A
3.10.6, Control Rod Testing - Operating			
NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling			
M.1	Adds a requirement to ensure adequate CRD charging water pressure is available. Also, adds an appropriate Surveillance Requirement.	LCO 3.10.7.f, SR 3.10.7.6	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	Revises the requirements of CTS 3.1.A Actions 1 and 2 to require the SDM test to be immediately suspended by placing the reactor mode switch in shutdown or refueling when required APRMs are inoperable.	3.10.7 ACTION B	3.1.A Actions 1 and 2
Current Specification 3/4.12.A, Primary Containment Integrity			
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity.	N/A	3/4.12.A
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
M.1	Adds a new requirement that a Senior Reactor Operator (SRO) be responsible for control room command and control function while either unit is in MODES 1, 2 or 3 and an individual with an active SRO or Reactor Operator license be responsible for the control room command function while both units are in MODES 4 or 5 or defueled.	5.1.2	NONE
	5.2, Organization		
M.1	Adds a requirement that at least one required non-licensed operator be assigned to each unit.	5.2.2.a	6.2.B.1
	5.3, Unit Staff Qualifications		
NONE	NONE	NONE	NONE
	5.4, Procedures		
M.1	Adds requirement that all programs specified in Specification 5.5 have written procedures.	5.4.1.d	N/A
	5.5, Programs and Manuals		
M.1	Modifies the requirement to include Shutdown Cooling (SDC) and Reactor Water Cleanup (RWCU) in the systems addressed by the Reactor Coolant Sources Outside Primary Containment Program.	5.5.2	6.8.D.1
M.2	Adds three new programs, the Component Cyclic or Transient Limit, the Technical Specification (TS) Bases Control Program and the Safety Function Determination Program (SFDP).	5.5.5, 5.5.10, 5.5.11	N/A

M.3	Adds new requirements to: 1) verify the new fuel oil flash point is within the requirements of the applicable ASTM standard; 2) verify, within 31 days of adding new fuel to the storage tanks, that kinematic viscosity is within limits; and 3) verify, within 31 days of adding new fuel to the storage tanks, that properties other than those specifically addressed are within limits for ASTM fuel.	5.5.9.a.2, 5.5.9.b	4.9.A.5.b, 4.9.A.5.c
5.6, Reporting Requirements			
M.1	Modifies the Drywell Radiation Monitor inoperability reporting requirements to require the report within 14 days, instead of 30 days, after the restoration time has expired.	5.6.6	Table 3.2.F-1, Action 61b
5.7, High Radiation Area			
NONE	NONE	NONE	NONE
Current Specification 6.4, Training			
NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation			
NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program			
NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program			

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

NONE	NONE	NONE	NONE