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 Conditions (MODES) 3 and 4, b) the addition of the refuel mode switch position to MODE 2 (including footnote (a)), and c) the deletion of the coolant temperature limit of MODE 5. These changes address plant conditions not previously satisfying a defined MODE, or satisfying more than one MODE.	Table 1.1-1	Table 1.2

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation.	2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3	2.1.1, 2.1.2, 2.1.3, 2.1.4
M.2	Specifies limits on steam dome pressure and core flow as "greater than or equal to" instead of "greater than," resolving a discontinuity between the Safety Limits in CTS 2.1.1 and CTS 2.1.2.	2.1.1.2, 2.2	2.1.2

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
M.1	Adds an additional Surveillance Frequency for SDM verification (CTS 4.1.1.a) to clarify the requirements necessary for assuring SDM during the refueling process.	SR 3.1.1.1 1st Frequency	N/A
	3.1.2, Reactivity Anomalies		
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 in the SER for Amendment Nos. 116 and 101, dated October 29, 1996. Since LaSalle 1 and 2 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.	LCO 3.1.2, SR 3.1.2.1	3.1.2, 4.1.2
	3.1.3, Control Rod OPERABILITY		
M.1	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	3.1.3.1 Actions a.1.a) and b.1.a)1)
M.2	If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs.	3.1.3 Required Action A.2	3.1.3.1 Action a.1.b)

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	Eliminates the check of insertion capability for non-stuck inoperable control rods (i.e., when they are inoperable due to an inoperable CRD accumulator or due to loss of position indication when below the low power setpoint), replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.1 Action b.1.a)2) including footnote **
M.4	Not used.	N/A	N/A
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	4.1.3.1.2
M.6	Changes Actions for non-stuck inoperable control rods (i.e., when control rod position indication is lost) to eliminate the check of insertion capability; replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.7 Action a.3.(a)1)
3.1.4, Control Rod Scram Times			
M.1	Changes the pressure at which the control rods must be tested from ≥ 950 to ≥ 800 psig, corresponding to the limiting pressure for CRD scram testing for the LaSalle 1 and 2 CRD System.	SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.4	4.1.3.2
M.2	Deletes the flexibility provided by CTS 4.1.3.2.b "for specifically affected" control rods to delay post-maintenance testing until reactor pressure is ≥ 950 psig (i.e., entry into MODE 2 is currently allowed without scram time testing a control rod that has had maintenance performed). A Surveillance Requirement, SR 3.1.4.3, has been added that requires a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable. To allow testing at less than normal operating pressures, a requirement for scram time limits at < 800 psig is included. The normal pressure test also has a finite complete time: “prior to exceeding 40% RTP.”	SR 3.1.4.3, SR 3.1.4.4	4.1.3.2.b

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	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.	LCO 3.1.4, Table 3.1.4-1	LCO 3.1.3.2, LCO 3.1.3.3, LCO 3.1.3.4
3.1.5, Control Rod Scram Accumulators			
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	3.1.3.5 Action a.1.a)
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 $\leq$ 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	To ensure consistency with the temperature/concentration requirements of CTS Figure 3.1.5-1 at the maximum allowable sodium pentaborate solution concentration, the pump suction piping temperature limit is increased from $\geq$ 60°F to $\geq$ 68°F.	SR 3.1.7.3	4.1.5.a.2
3.1.8, SDV Vent and Drain Valves			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support			
NONE	NONE	NONE	NONE
Current Specification 3/4.1.6, 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			
NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE			
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	Deletes the exemption to the provisions of CTS 4.0.4, provided for the CHANNEL CHECK of Functional Units 1.a and 2.a, that allows entry into MODE 2 from MODE 1 for 24 hours, since the Surveillance can be performed in MODE 1 at low power prior to entering MODE 2.	N/A	Table 4.3.1.1-1 footnote * for Functional units 1.a and 2.a
M.2	The CTS Table 3.3.1-1 requires only one OPERABLE channel per trip system of the RPS Manual Scram Function (Functional Unit 12). However, UFSAR Table 7.2-2 and Table 7.2-3 identify a minimum of 2 channels of the Manual Scram Function per trip system required for the functional performance of the RPS. Therefore, the number of required channels per trip system is increased to 2.	Table 3.3.1.1-1 Function 11	Table 3.3.1-1 Functional Unit 12
M.3	(Unit 1 only) Adds a CHANNEL CHECK requirement for the Reactor Vessel Water Level - Low, Level 3 Function.	SR 3.3.1.1.1 for Table 3.3.1.1 Function 4	N/A
A.8	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 3.3.1-1 Actions 3 and 9
	3.3.1.2, SRM Instrumentation		
M.1	Adds a restriction to determine signal-to-noise ratio and verify it is greater than or equal to 2:1 or 20:1, depending upon the count rate requirement.	SR 3.3.1.2.6, SR 3.3.1.2.5	4.3.7.6.b, 4.9.2.b
M.2	Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs on Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since 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	4.3.7.6.c

M.3	Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry.	SR 3.3.1.2.7	N/A
M.4	The CTS Applicability does not require SRMs to be OPERABLE when no more than four 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 SR 3.3.1.2.4 to verify OPERABILITY for conditions when the removal of fuel assemblies would not maintain the required count rate and verification for required positions of SRM detectors in SR 3.3.1.2.2.	3.3.1.2, SR 3.3.1.2.2 SR 3.3.1.2.4	3.9.2 Applicability
M.5	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	4.9.2.a.3
3.3.2.1, Control Rod Block Instrumentation			
M.1	Deletes the allowance to place a channel in an inoperable status, without requiring actions to be taken, for up to 12 hours to repair the channel provided at least one other OPERABLE channel in the same trip system is monitoring that parameter.	N/A	4.3.6 footnote *
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 $\leq$ 10%, not just when the withdrawal is for the purpose of making the reactor critical.	SR 3.3.2.1.2 Note	3.1.4.1 footnote *, 4.1.4.1.a and b
M.4	Adds an RWM Surveillance to verify the automatic enabling point of the RWM.	SR 3.3.1.2.6	N/A

M.5	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
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
NONE	NONE	NONE	NONE
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 LaSalle 1 and 2.	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 3.3.3.1.3	N/A
M.2	Increases the required number of channels for the Suppression Chamber Water Temperature Function from 7 (1 per well) to "2," where the Bases states there are 2 channels of suppression chamber water temperature measurement, each receiving input from 7 temperature sensors, for a total of 14 required temperature sensors.	Table 3.3.3.1-1 Function 9	Table 3.3.7.5-1 Instrument 4

M.3	The Reactor Vessel Water Level instrumentation in CTS Table 3.3.7.5-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: “wide range” covering -150 inches to +60 inches; and “fuel zone” covering -311 inches to +111 inches. Currently, CTS Table 3.3.7.5-1 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) and Function 2.b (Reactor Vessel Water Level - Wide Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1-1 Functions 2.a and 2.b	Table 3.3.7.5-1 Instrument 2
M.4	The Drywell Pressure instrumentation in CTS Table 3.3.7.5-1 specifies requirements for two channels but does not specify the required range. To actually achieve the Regulatory Guide 1.97 required range, two instruments are necessary in each channel - one “narrow range” covering -5 psig to +5 psig; and one “wide range” covering 0 psig to +200 psig. Using the ITS format, the instruments required to cover these ranges are specifically delineated in ITS Table 3.3.3.1-1 as separate line items under Function 4, with each channel consisting of one instrument. Therefore, ITS Table 3.3.3.1-1 Function 4.a (Drywell Pressure - Narrow Range) and Function 4.b (Drywell Pressure - Wide Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1-1 Functions 4.a and 4.b	Table 3.3.7.5-1 Instrument 6
M.5	Increases the CHANNEL CALIBRATION frequency for the Drywell Oxygen Concentration Analyzer and Monitor from 18 months to 92 days to place it on the same testing schedule as the Drywell Hydrogen Concentration Analyzer and Monitor for operational convenience, as is the current practice.	SR 3.3.3.1.2	4.3.7.5 for Table 4.3.7.5-1 Function 8
3.3.3.2, Remote Shutdown Monitoring System			
NONE	NONE	NONE	NONE
3.3.4.1, EOC-RPT Instrumentation			

M.1	Adds a Note to ITS 3.3.4.1 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. With the addition of the Note, ITS 3.3.4.1 Required Action A.1 has also been added to restore the channel in lieu of tripping the channel. This new Note and Required Action will ensure the functional capability of the EOC-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.1, 3.3.4.1 Required Action A.2 Note	3.3.4.2 Actions b and c.1
M.2	The time allowed to reduce THERMAL POWER to less than 25% of RATED THERMAL POWER when one or both trip systems are not returned to OPERABLE status within the allowed Completion Times and the MCPR limit is not adjusted has been reduced from 6 hours to 4 hours.	3.3.4.1 Required Action C.2	3.3.4.2 Actions d.2 and e.2
3.3.4.2, ATWS-RPT Instrumentation			
M.1	Adds a Note to ITS 3.3.4.2 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, 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.	3.3.4.2 Required Action A.2 Note	3.3.4.1 Actions b and c.1
3.3.5.1, ECCS Instrumentation			
M.1	Adds an additional channel per trip system for the ADS Drywell Pressure Bypass Timer Function, since each Trip System includes two bypass timers, and both bypass timers must function for each trip system to complete the appropriate logic.	Table 3.3.5.1-1 Functions 4.g and 5.f	Table 3.3.3-1 Trip Functions A.2.h and B.2.g
M.2	Adds appropriate Required Actions for response to loss of the initiation capability of certain Functions for both divisions/trip systems.	3.3.5.1 Required Actions B.2, C.1, D.1, E.1, and F.1	Table 3.3.3-1 Action 35.a

M.3	Not used.	N/A	N/A
M.4	The following additional Allowable Values have been added: a) A maximum Allowable Value for the LPCS, LPCI, and HPCS Pump Discharge Flow — Low (Bypass), has been provided to ensure the valves will close to provide assumed ECCS flow to the core; and b) Maximum Allowable Values for the LPCS and RHR Pump Discharge Pressure—High have been provided to ensure the setpoint is below the shutoff head of the low pressure ECCS pumps.	Table 3.3.5.1-1 Function 1.e, 1.f, 2.e, 3.e, 4.e, 4.f, and 5.e	Table 3.3.3-2 Trip Functions A.1.c, A.1.g, A.2.e, A.2.f, B.1.e, B.2.e, and C.1.g
M.5	Not used.		
M.6	Adds an additional channel per trip system for the ADS Manual Initiation Function, since each Trip System includes two push button channels, and both push button channels must function for each trip system to complete the appropriate logic.	Table 3.3.5.1-1 Functions 4.h and 5.g	Table 3.3.3-1 Trip Function A.2.g and B.2.f
3.3.5.2, RCIC System Instrumentation			
M.1	An additional Function has been added, ITS Table 3.3.5.2-1 Function 3, to provide requirements for the Condensate Storage Tank Level—Low Instrumentation. Appropriate ACTIONS and Surveillances have also been added.	Table 3.3.5.2-1 Function 3, 3.3.5.1 ACTION D	N/A
M.2	An appropriate Required Action has been added for response to loss of RCIC initiation capability of a Function.	3.3.5.2 Required Action B.1	N/A
3.3.6.1, Primary Containment Isolation Instrumentation			
M.1	CTS 3.3.2-1 Trip Function A.1.c.3), Main Steam Line Flow—High requires 2 channels per trip system for each main steam line. However, CTS Table 3.3.2-1 footnote (d) specifies that a channel is OPERABLE if 2 of 4 instruments in that channel are OPERABLE. This Note has been deleted since 2 channels per steam line are required to be OPERABLE in each trip system to ensure the single failure criteria is preserved.	N/A	Table 3.3.2-1 footnote (d)

M.2	The CTS provides no actions for inoperable channels that affect the Group 4 primary containment isolation valves. Therefore, appropriate actions have been added.	3.3.6.1 ACTIONS F and H	Table 3.3.2-1 ACTION 24 for Trip Functions A.2.a, A.2.b, A.2.c, and A.2.d
M.3	Allowable Values for two Functions have been added. These Functions are Timer Functions that delay initiation of the RCIC Steam Flow—High and RWCU Differential Flow—High Functions.	Table 3.3.6.1-1 Functions 3.b and 4.b	N/A
M.4	The Applicability for the Reactor Vessel Water Level—Low, Level 3 Function has been changed to require Operability in MODES 4 and 5, with only one of the two low water level instrumentation trip systems required to be Operable when RHR System integrity is maintained. An appropriate ACTION has also been added for when the channel(s) of the Function is inoperable in MODES 4 and 5.	Table 3.3.6.1-1 Function 5.a and Note (c), 3.3.6.1 ACTION J	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function A.6.a Applicability
M.5	The number of required channels for the Group 1 MSIV Manual Initiation Function has been increased from "1" per trip system to "2" per trip system. The design of the Group 1 logic for MSIVs includes two manual push buttons per trip system, with one from each trip system being required to actuate the MSIVs. Currently, only one channel per trip system is required.	Table 3.3.6.1-1 Function 1.f	Table 3.3.2-1 Trip Function B.1 and B.2
M.6	The CHANNEL CALIBRATION Frequency for the Main Steam Line Flow—High Function has been changed from 18 months to 92 days.	Table 3.3.6.1-1 Function 1.c, SR 3.3.6.1.3	Table 4.3.2.1-1 Trip Function A.1.c.3)
M.7	Adds the Manual Initiation Function for primary containment isolation valve Group 10 into ITS Table 3.3.6.1-1 Function 2.g.	Table 3.3.6.1-1 Function 2.g	N/A
3.3.6.2, Secondary Containment Isolation Instrumentation			
M.1	For the Manual Initiation Function of secondary containment isolation actuation instrumentation, the CTS provides 32 hours or 48 hours of operation before isolation of the valves or a shutdown is required. The ITS will allow only 24 hours before isolation of the valves is required.	3.3.6.2 ACTION A	Table 3.3.2-1 Action 26

3.3.7.1, CRAF System Instrumentation			
M.1	Deletes the allowance that provides 4 hours to adjust an Allowable Value to within its limit prior to declaring the channel inoperable.	N/A	3.3.7.1 Action a
M.2	CTS Table 3.3.7.1-1 footnote **, "provided at least one other operable channel in the same Trip System is monitoring that Trip Function," has been clarified to provide direct indication of the intent of the current wording. The ITS Note states "provided the associated Function maintains CRAF subsystem initiation capability."	Surveillance Requirements Note	Table 3.3.7.1-1 footnote **
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 ESF equipment 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	Tables 3.3.3-1 and 4.3.3.1-1 footnote **
M.2	CTS Table 3.3.3-1 footnote (d), "provided at least one other OPERABLE channel/instrument in the same trip system is monitoring that parameter," has been clarified to provide direct indication of the intent of the current wording. The ITS Note states "provided the associated Function maintains LOP initiation capability."	Surveillance Requirements Note 2	Table 3.3.3-1 footnote (d)
3.3.8.2, RPS Electric Power Monitoring			
M.1	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 3/4.3.7.3, Meteorological Monitoring Instrumentation			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation			
NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.12, Loose Part Detection System			
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	Not used.	N/A	N/A
M.2	Reduces the time allowed to satisfy the requirements of the LCO (i.e., enter Region III) from 4 hours to 2.	3.4.1 ACTION B	3.4.1.5 Action b.2
M.3	Replaces the requirement to perform a controlled shutdown per CTS 3.0.3 with a requirement to immediately place the reactor mode switch in the shutdown position, when operation in Region III is not restored within the allowed time.	3.4.1 ACTION E	3.0.3
M.4	Adds a Surveillance Requirement to verify operation is in Region III of ITS Figure 3.4.1-1 every 24 hours.	SR 3.4.1.2	N/A
3.4.2, Flow Control Valves			
NONE	NONE	NONE	NONE
3.4.3, Jet Pumps			
NONE	NONE	NONE	NONE
3.4.4, Safety/Relief Valves			
NONE	NONE	NONE	NONE
3.4.5, RCS Operational Leakage			

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

M.1	Adds a requirement that the source of leakage to be identified within 4 hours is not from intergranular stress corrosion cracking (IGSCC) susceptible material.	3.4.5 ACTION B	3.4.3.2 Action e
3.4.6, RCS Pressure Isolation Valve Leakage			
M.1	Adds a Note that requires the valves used to provide isolation between the high pressure and low pressure portions of the affected system to have been verified to meet the PIV leakage limits within the required Surveillance Frequency and that the valves be in the reactor coolant system or the high pressure portion of the affected system.	3.4.6 Required Actions A.1 and A.2 Note	N/A
3.4.7, RCS Leakage Detection System Instrumentation			
NONE	NONE	NONE	NONE
3.4.8, RCS Specific Activity			
M.1	Changes the Frequency for isotopic analysis for dose equivalent I-131 concentration from at least once per 31 days to at least once per 7 days as a compensatory measure for ensuring that even with deletion of the requirement that gross specific activity remain less than or equal to 100/E-bar μCi/gram, offsite doses will remain within a small fraction of the limits of 10 CFR 100.	SR 3.4.8.1	Table 4.4.5-1 Item 2
3.4.9, RHR Shutdown Cooling System - Hot Shutdown			
NONE	NONE	NONE	NONE
3.4.10, RHR Shutdown Cooling System - Cold Shutdown			
NONE	NONE	NONE	NONE

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

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
M.1	Adds a requirement, as represented by the STAGGERED TEST BASIS, for both ADS valve solenoids to be verified in the course of 48 months.	SR 3.5.1.8	4.5.1.d.2.b)
M.2	Deletes the CTS 4.0.4 exception to delay performing the ADS valve opening Surveillance until 12 hours after adequate steam pressure is attained. The ADS valve opening Surveillance will now be required to be performed when the plant is shutdown and at low pressure.	N/A	3.5.1 Action h
	3.5.2, ECCS-Shutdown		
M.1	Deletes the allowance to not require the suppression pool to be OPERABLE during cavity flooding.	N/A	3.5.3 footnote *
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	3.5.2 Action b, 3.5.3 Action b
	3.5.3, RCIC System		
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.1, Primary Containment			
NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock			
L.3	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	3.6.1.3 Actions a.1 and b
3.6.1.3, Primary Containment Isolation Valves			
M.1	Adds a new Applicability of “when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation",” which effectively adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability, 3.6.1.3 ACTION F	N/A
M.2	Not used.		
M.3	Adds a new Surveillance Requirement that verifies the 8 and 26 inch purge valves are closed every 31 days (except when allowed to be open, as described in DOC L.12 for ITS 3.6.1.3).	SR 3.6.1.3.1	N/A
L.3	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.	3.6.1.2 Required Actions A.1 and C.2	3.6.1.3 Actions a.1 and b
3.6.1.4, Drywell and Suppression Chamber Pressure			

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

NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature			
NONE	NONE	NONE	NONE
3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers			
M.1	CTS 3.6.4 Action a only allows one of the four vacuum breakers to be inoperable for opening, but CTS 3.6.4 Action b could allow a separate vacuum breaker to be inoperable due to being open. The current accident analysis does not allow two vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.3 must be entered. Therefore, ITS 3.6.1.6 ACTION D has been added to ensure that when two or more vacuum breakers are inoperable, ITS LCO 3.0.3 will continue to be entered.	3.6.1.6 ACTION D	3.0.3
3.6.2.1, Suppression Pool Average Temperature			
M.1	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 200 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the requirement in CTS 3.6.2.1.a.2.b), with closed MSIVs, has been removed from the LCO and is now only in the ACTIONS.	3.6.2.1 ACTION D	3.6.2.1.a.2.b)
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 200 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS C and D	3.6.2.1.a.2.a), 3.6.2.1.a.2.b), 3.6.2.1 Actions b.1 and b.2
M.3	Expands, from MODES 1 and 2 to MODES 1, 2, and 3, the applicability for performance of the suppression pool average temperature verification.	SR 3.6.2.1.1	4.6.2.1.b

3.6.2.2, Suppression Pool Water Level			
NONE	NONE	NONE	NONE
3.6.2.3, RHR Suppression Pool Cooling			
A.2	Deletes CTS 3.6.2.3 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.3 Action C requires a shutdown to MODE 4 with no allowance to remain in MODE 3.	3.6.2.3 Action C	3.6.2.3 Action b, footnote *
3.6.2.4, RHR Suppression Pool Spray			
A.2	Deletes CTS 3.6.2.2 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.4 Action C requires a shutdown to MODE 4 with no allowance to remain in MODE 3.	3.6.2.4 Action C	3.6.2.2 Action b, footnote *
3.6.3.1, Primary Containment Hydrogen Recombiners			
NONE	NONE	NONE	NONE
3.6.3.2, Primary Containment Oxygen Concentration			
NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment			

M.1	Deletes the allowance that provides a delay of 1 hour prior to declaring Secondary Containment inoperable when the Reactor Building Ventilation System fails (which could result in failure to meet CTS 4.6.5.1.a).	N/A	4.6.5.1.a footnote #
M.2	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, SR 3.6.4.1.4	4.6.5.1.c
3.6.4.2, Secondary Containment Isolation Valves			
M.1	CTS 4.6.5.1.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 3.6.5.2 requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.6.5.2 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	4.6.5.1.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, Residual Heat Removal Service Water System			
NONE	NONE	NONE	NONE
3.7.2, Diesel Generator Cooling Water System			
M.1	Changes the Applicability from "When the diesel generator is required to be OPERABLE" to "MODES 1, 2, and 3," since the DGCW also provides cooling water to the ECCS cubical area cooling coils. (The MODES 4 and 5 Applicability is discussed in DOC LA.2 for ITS 3.7.2.)	3.7.2	3.7.1.2
3.7.3, Ultimate Heat Sink			
M.1	Adds a new Surveillance Requirement to require verification that the cooling water supplied to the plant from the UHS (CSCS pond) is $\leq$ 97.5°F every 24 hours. Adds an ACTION that requires a shutdown of the unit is the average water temperature is not within the new limit.	SR 3.7.3.1, 3.7.3 ACTION B	N/A
3.7.4, Control Room Area Filtration System			
NONE	NONE	NONE	NONE
3.7.5, Control Room Area Ventilation Air Conditioning System			
M.1 Open	To ensure the OPERABILITY of components in the control room in a post-accident environment, a new Specification has been added requiring the Control Room Area Ventilation Air Conditioning System to be OPERABLE.	3.7.5	N/A
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	4.11.2.2.2.b
3.7.7, Main Turbine Bypass System			
NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.4, Sealed Source Contamination			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.7, Area Temperature Monitoring			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.9, Snubbers			
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	The CTS requires de-energization and re-energization of the Division 3 bus and its loads for loss-of-offsite-power simulation testing and for testing of response to a loss-of-offsite-power in conjunction with an ECCS actuation. The ITS is written to differentiate between the Division 3 loads that are permanently connected and the auto-connected loads such as the diesel generator cooling water pump.	SR 3.8.1.11, SR 3.8.1.19	4.8.1.1.2.d.4, 4.8.1.1.2.d.6
M.2	A new requirement is added to the ITS for the Division 3 DG to maintain 550 gallons of fuel oil in the day tank.	SR 3.8.1.4	N/A
M.3	Not used.	N/A	N/A
M.4	When the common DG is removed from service for planned maintenance or testing, CTS 4.8.1.1.1.a (the offsite circuit check) is required to be performed within 48 hours prior to removal from service of the common DG. However, if the Surveillance is performed 48 hours prior to removal from service of the common DG, it is possible that the configuration of the offsite circuits may have changed by the time the DG is actually removed from service. Therefore, the ITS requires the offsite circuit check to be performed within 1 hour following removal of the diesel generator from service.	3.8.1 Required Action B.2	LCO 3.8.1.1.b footnote *
M.5	The CTS states that the provisions of Specification 3.0.4 are not applicable when the common DG is removed from service for planned maintenance or testing. The ITS does not provide this exception to ITS LCO 3.0.4. Elimination of this exception will require the inoperable DG to be restored to OPERABLE status prior to making a MODE change.	N/A	LCO 3.8.1.1.b footnote *
M.6	CTS 3.8.1.1 Action e requires the unit to be placed in Hot Shutdown (Mode 3) if one of the two inoperable offsite circuits is not restored to Operable status in 24 hours. ITS 3.8.1 ACTION G will require the unit to be placed in Mode 4 within 36 hours, in addition to being in Mode 3 within 12 hours.	3.8.1 ACTION G	3.8.1.1 Action e
M.7	When the opposite unit's Division 2 diesel generator is inoperable, CTS 3.8.1.1 Action g only requires a DG start verification or a verification that a common mode failure does not exist on the unit Division 2 diesel generator. ITS 3.8.1 ACTION C requires a DG start verification or a verification that a common mode failure does not exist on all required OPERABLE DGs.	3.8.1 ACTION C	3.8.1.1 Action g

M.8	Changes from 72 hours to 12 hours the time provided for one offsite circuit and the Division 3 DG to be inoperable concurrently.	3.8.1 ACTION E	3.8.1.1 Action h
M.9	Two Notes have been added representative of current LaSalle 1 and 2 practice (though more restrictive since the CTS does not have these restrictions): 1) SR 3.8.1.3 Note 3 precludes this Surveillance from being performed on more than one DG at a time, ensuring that an electrical disturbance during the DG test can only adversely affect one DG; and 2) SR 3.8.1.3 Note 4 requires that this SR be immediately preceded by a successful performance of SR 3.8.1.2 (the DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test.	SR 3.8.1.3 Notes 3 and 4	N/A
M.10	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 3.8.1.14, including Notes 1 and 3	4.8.1.1.2.d.8
M.11	Requires the minimum voltage for the 10 year DG simultaneous start test to be 3744 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	4.8.1.1.2.e
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.	LCO 3.8.2.a	LCO 3.8.1.2.a
M.2	Requires the single Division 1 or Division 2 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	LCO 3.8.1.2.b
M.3	A new requirement is added to the ITS for the Division 3 DG to maintain 550 gallons of fuel oil in the day tank.	SR 3.8.1.4, SR 3.8.2.1	N/A

M.4	When a required offsite circuit or a Division 1 or 2 unit DG is inoperable, the actions imposed by CTS 3.8.1.2 Action a do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.8.1.2 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			
M.1	A new Sureveillance has been added to check for and remove accumulated water from each required fuel oil storage tank every 92 days.	3.8.3.4	N/A
3.8.4, DC Sources - Operating			
M.1	CTS 4.7.3.d provides the Surveillance Requirements for the 250 VDC electrical power subsystem that supplies power to the RCIC System. The Applicability of CTS 3/4.7.3 is MODES 1, 2, and 3 with reactor steam dome pressure greater than 150 psig. The ITS present the 250 VDC electrical power subsystem in the same Specification as the 125 VDC electrical power subsystems. The ITS 3.8.4 Applicability covers all of MODES 1, 2, and 3, not just when the reactor steam dome pressure is greater than 150 psig, since the 250 VDC electrical power subsystem also provides power to a RCIC primary containment isolation valve (which is required by CTS 3.6.3 to be OPERABLE in MODES 1, 2, and 3).	3.8.4 Applicability	3/4.7.3 Applicability
M.2	Adds new SRs for the 250 VDC RCIC battery (verification that no visible corrosion at battery terminals and connections is present, resistance values for bolted battery connections, demonstration of charger capability, and battery service and modified performance/performance discharge tests) to ensure the 250V battery can perform its required function.	SR 3.8.4.2, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7, SR 3.8.4.8	N/A
M.3	Revises the 250 VDC battery limit to $\geq$ 256 volts, which is based on 2.20 volts/cell.	SR 3.8.4.1	4.7.3.d.1.d)
3.8.5, DC Sources - Shutdown			

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

M.1		LCO 3.8.5, 3.8.5 Required Action B.1	LCO 3.8.2.4, 3.8.2.4 Action a

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

M.2	Not used.		
M.3	Provides new Required Actions for when the Division 3 DC source is inoperable, which require suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs.	3.8.5 Required Actions B.2.1, B.2.2, and B.2.3	3.8.2.4 Action b
M.4	With one DC electrical power source division (battery and/or battery charger) inoperable, CTS 3.8.2.4 Action c allows operation to continue for 72 hours as long as the associated 125V DC electrical power distribution subsystem is energized by the OPERABLE opposite unit DC electrical power subsystem. A Note has been added to CTS 3.8.2.4 Action c (ITS 3.8.5 Condition A) to not allow the actions to be taken when the opposite unit is in MODE 1, 2, or 3.	3.8.5 Condition A Note	3.8.2.4 Action c
M.5	In lieu of declaring the standing gas treatment subsystem and control room and auxiliary electric equipment room emergency filtration subsystem inoperable and taking the Actions of the appropriate LCO as required by the CTS the ITS provides three new actions for when the opposite unit's Division 2 DC Source is inoperable. The ITS require immediate suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment and OPDRVs.	3.8.5 Required Actions B.2.1, B.2.2 and B.2.3`	3.8.2.4 Action d
3.8.6, Battery Cell Parameters			
M.1	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.8.2.3.2-1 footnote (c)
M.2	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 4.8.2.3.2-1 footnote (b)
M.3	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	Table 4.8.2.3.2-1 footnotes (1) and (2)

M.4	New Surveillance Requirements have been added for the batteries. For the 250 VDC battery, ITS SR 3.8.6.1 will require the individual pilot cell voltage to be checked every 7 days and ITS SR 3.8.6.2 will require all individual cell voltages to be checked every 92 days. In addition, ITS SR 3.8.6.3 requires the average electrolyte temperature of representative cells to be verified > 60°F for the 125V batteries, and > 65°F for the 250V battery.	SR 3.8.6.1, SR 3.8.6.2, SR 3.8.6.3	N/A
M.5	Adds the following new limits for the 250 VDC battery: 1) new Category A and Category B limits for the 250 VDC battery that are applicable to each connected cell, including the pilot cell. These new limits will require the electrolyte level to be greater than the minimum level indication mark and less than or equal to 1/4 inch above the maximum level indication mark. These limits are modified by ITS Table 3.8.6-1 footnote (a), which allows the limits to be exceeded during and following an equalizing charge, provided it is not overflowing. If these new limits are exceeded, ITS 3.8.6 ACTION A will require the limits to be restored within 31 days, as well as ensuring the Category C limits continue to be met during this 31 day period. If not restored, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken (i.e., RCIC and the RCIC PCIV will be declared inoperable and the ACTIONS of the individual System Specifications taken). 2) Adds an additional Category C limit that the electrolyte level cannot be overflowing. If this Category C limit is exceeded, the battery will be declared inoperable immediately, consistent with the CTS. 3) Adds new Category B limit for all connected cells and a Category C limit for all connected cells, and provides a Category C limit for the deviation from the average for an individual cell. The limits are modified by two footnotes. ITS 3.8.6-1 footnotes (b) and (c) require the specific gravity to be corrected for electrolyte temperature and level, and allows a charging current requirement to substitute for the specific gravity requirement under certain conditions. When the Category C limit is not met, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken. When the Category B limit is exceeded, ITS 3.8.6 ACTION A will require the limits to be restored within 31 days, as well as ensuring the Category C limits continue to be met during this 31 day period. If not restored, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken.	3.8.6 ACTIONS A and B, Table 3.8.6-1 Category A, B, and C limits, including footnotes (a), (b), and (c)	N/A
M.6	Adds a requirement that the specific gravity be corrected for electrolyte level.	Table 3.8.6-1 footnote (b)	N/A

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 subsystems, in combination, 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 G	N/A
M.3	CTS 4.7.3.d provides the Surveillance Requirements for the 250 VDC electrical power subsystem that supplies power to the RCIC System. The Applicability of CTS 3/4.7.3 is MODES 1, 2, and 3 with reactor steam dome pressure greater than 150 psig. The ITS present the 250 VDC electrical power subsystem in the same Specification as the 125 VDC electrical power subsystems. The ITS 3.8.4 Applicability covers all of MODES 1, 2, and 3, not just when the reactor steam dome pressure is greater than 150 psig, since the 250 VDC electrical power subsystem also provides power to a RCIC primary containment isolation valve (which is required by CTS 3.6.3 to be OPERABLE in MODES 1, 2, and 3).	3.8.7 Applicability	3/4.7.3 Applicability
M.4	CTS 3.8.2.1 Action b requires that the HPCS System be declared inoperable when the Division 3 AC distribution system is inoperable. However, the HPCS System is not the only affected engineered safety feature supported by the Division 3 AC distribution system. Therefore, the associated ITS 3.8.7 Required Action will require that the “associated supported features” be declared inoperable. ~~This will include both the HPCS System and the associated primary containment isolation valves.~~ [This discussion indicates that the Div. 3 AC power source (and possibly DC power source) provides power to more than the HPCS system. If this is correct, then the Note in LCO 3.8.1 that allows the Div. 3 power sources to not be required when the HPCS is inoperable may not be acceptable for this plant design. Other part s of the TS may also be affected.]	3.8.7 ACTION E	3.8.2.1 Action b
3.8.8, Distribution Systems - Shutdown			

M.1	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. CTS 3.8.2.2 Actions a and 3.8.2.4 Action a have been modified to be "one or more required" instead of the current "both," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem. Currently, this action only applies to the Division 3 equipment and the opposite unit Division 2 equipment.	LCO 3.8.8, 3.8.8 Required Action A.1	LCO 3.8.2.2, 3.8.2.2 Action a, LCO 3.8.2.4, 3.8.2.4 Action a
M.2	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
M.3	New Required Actions have been provided for when the Division 3 AC or DC distribution subsystem is inoperable, requiring suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs	3.8.8 Required Actions A.2.1, A.2.2, and A.2.3	N/A
Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.1, Refueling Equipment Interlocks			
NONE	NONE	NONE	NONE
3.9.2, Refuel Position One-Rod-Out Interlock			
NONE	NONE	NONE	NONE
3.9.3, Control Rod Position			
NONE	NONE	NONE	NONE
3.9.4, Control Rod Position Indication			
M.1	Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.1.3.7 Action b for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The 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	3.1.3.7, 3.1.3.7 Action b
3.9.5, Control Rod OPERABILITY - Refueling			

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram).	LCO 3.9.5, 3.9.5 ACTION A, SR 3.9.5.1	N/A
3.9.6, RPV Water Level - Irradiated Fuel			
NONE	NONE	NONE	NONE
3.9.7, RPV Water Level - New Fuel or Control Rods			
NONE	NONE	NONE	NONE
3.9.8, Residual Heat Removal - High Water Level			
NONE	NONE	NONE	NONE
3.9.9, Residual Heat Removal - 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 3/4.9.4, Decay Time			

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
Current Specification 3/4.9.5, Communications			
NONE	NONE	NONE	NONE
Current Specification 3/4.9.6, Crane and Hoist			
NONE	NONE	NONE	NONE
Current Specification 3/4.9.7, Crane Travel			
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 3.9.10.1 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 3.9.10.1 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	LCO 3.9.10.1
M.2	CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, 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, consistent with existing conditions of the Operating Licenses. In addition, adds a new Surveillance Requirement to verify, every 24 hours, fuel assemblies are not being moved within the reactor pressure vessel.	LCO 3.10.5.c, SR 3.10.5.3	N/A
	3.10.6, Control Rod Testing - Operating		
M.1	Deletes statement that allows this Special Test Exception to be used during the startup test program, since the Startup Test Program has been completed at LaSalle 1 and 2.	N/A	LCO 3.10.2.d
M.2	Deletes the flexibility to move control rods between 100% rod density and 75% rod density without verifying the movement is within the constraints of the established control rod pattern sequence when the RWM is bypassed.	N/A	4.10.2.b

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
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
Current Specification 3/4.10.1, Primary Containment Integrity			
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity.	N/A	3/4.10.1
Current Specification 3/4.10.5, Oxygen Concentration			
M.1	Deletes Specification that provides an exception, during startup test program, to the requirement to maintain oxygen concentration within limits.	N/A	3/4.10.5
Current Specification 3/4.10.6, Training Startups			
M.1	Deletes Specification that provides an exception, during startup test program, to the requirement to maintain oxygen concentration within limits.	N/A	3/4.10.5
Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only)			
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 requirement that the plant manager to delegate in writing the succession of the responsibility for overall plant operations during his absence.	5.1.1	N/A
	5.2, Organization		
M.1	Modifies the requirement that at least one required non-licensed operator be assigned to each unit when fuel is in the reactor vessel to requiring that the non-licensed operator be assigned to each unit at all times.	5.2.2.a	Figure 6.1-3 footnote (b)
	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	Adds two new programs, the Technical Specification (TS) Bases Control Program and the Safety Function Determination Program (SFDP).	5.5.11, 5.5.12	N/A

M.2	Adds new requirements to: 1) verify either the API gravity or the absolute specific gravity of new fuel is within limits; 2) verify the new fuel oil flash point is within the requirements of the applicable ASTM standard; 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.	5.5.10.a.1, 5.5.10.a.2, 5.5.10.b	N/A
5.6, Reporting Requirements			
NONE	NONE	NONE	NONE
5.7, High Radiation Area			
NONE	NONE	NONE	NONE
Current Specification 6.1.E/F, Training			
NONE	NONE	NONE	NONE
Current Specification 6.2.B, Radiation Protection Program			
NONE	NONE	NONE	NONE
Current Specification 6.3, Reportable Event Action			
NONE	NONE	NONE	NONE
Current Specification 6.4, Safety Limit Violation			

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

NONE	NONE	NONE	NONE
Current Specification 6.5, Plant Operating Records			
NONE	NONE	NONE	NONE
Current Specification 6.7, Process Control Program			
NONE	NONE	NONE	NONE
Current Specification 6.9, Major Changes to Radioactive Waste Treatment System			
NONE	NONE	NONE	NONE