

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	1) Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor," and 2) for the LOGIC SYSTEM FUNCTIONAL TEST, allows the signal to be injected "as close to the sensor as practicable" in lieu of "from the sensor."	1.1 CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.6, 1.23	3
L.2	CTS 1.10 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 VI 56 No 98 May 21, 1991).	1.1 DOSE EQUIVALENT I-131 definition	1.10	3

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SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions.	SR 3.0.2	4.0.2	6
L.2	ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.3. The second and third paragraphs of ITS SR 3.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed.	SR 3.0.3	4.0.3	3

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SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN				
L.1	Modifies the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal," to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality.	3.1.1 ACTION E	3.1.1 Action c	4
L.2	Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.1.1 Required Action E.2	3.1.1 Action c	4
L.3	Deletes CTS 4.1.1.b since the SDM limits adequately account for uncertainties and biases, and for fuel cycle changes.	N/A	4.1.1.b	3
3.1.2, Reactivity Anomalies				
L.1	Revises the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours.	3.1.2 ACTION A	3.1.2 Action a	6
L.2	Replaces the term "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity.	SR 3.1.2.1	4.1.2.a	3
L.3	Replaces the frequency "31 effective full power days" (approximately 734 MWD/T) is proposed to be replaced with "1000 MWD/T."	SR 3.1.2.1	4.1.2.b	3

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.3, Control Rod OPERABILITY				
L.1	Revises the requirements for the local distribution of inoperable control rods by 1) adding a Note excluding its applicability above 10% power, 2) deleting actions for inoperable control rods whose position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, even if the inoperable control rods are within two cells of each other, and 3) revising the Completion Time from 1 hour to 4 hours to correct the situation prior to commencing a required shutdown.	3.1.3 ACTION D	3.1.3.1 Actions a.1, b.1.a), and b.1.a)1)	4, 6
L.2	Revises the Completion Time from 1 hour to 2 hours to insert the control rod.	3.1.3 Required Action A.2	3.1.3.1 Action a.1.b)	6
L.3	Deletes requirement for restoration of a stuck control rod within 48 hours. Adds a new Required Action to verify stuck control rod separation criteria since the Specification now allows continued operation with a stuck control rod.	3.1.3 Required Action A.1	3.1.3.1 Action a.3	4, 5
L.4	Extends the time allowed to complete the insertion of all inoperable non-stuck control rods to 3 hours for all cases. The time to disarm the control rods is extended to 4 hours - 1 hour beyond the time allowed to insert in recognition of the potential for excessive haste required to complete this task.	3.1.3 ACTION C	3.1.3.1 Actions b.1 and b.1.b), 3.1.3.6 Actions a.1 and a.1.b)	6
L.5	Extends verification of control rods to be non-stuck from 7 days to 31 days for control rods that are not fully withdrawn.	SR 3.1.3.3	4.1.3.1.2.a	3
L.6	Deletes daily notch test in the event power operation is continuing with an immovable control rod and the plant is operating at greater than the low power setpoint of the rod worth minimizer; only a single test once within 24 hours is required in ITS.	3.1.3 Required Action A.3	4.1.3.1.2.b	6
L.7	Extends the time to demonstrate SHUTDOWN MARGIN from 12 hours to 72 hours with a single control rod stuck in a withdrawn position.	3.1.3 Required Action A.4	4.1.1.c	6

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.8	Deletes the requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time. In addition, since the shutdown requirement ("Otherwise, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.1.3.2 Action 2 (since a control rod can always be declared inoperable), this part of the CTS 3.1.3.2 Action has also been deleted.	N/A	3.1.3.2 Action 2	4, 5
L.9	Deletes the coupling requirements during refueling (OPERATIONAL CONDITION 5) since only one control rod can be withdrawn from core cells containing fuel assemblies. However, these requirements are retained for the proposed SDM testing in MODE 5 (ITS 3.10.7).	N/A	LCO 3.1.3.6, 3.1.3.6 Action b (including footnote *)	2
L.10	Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed. Also, because of the limited time allowed to recouple, removes the restriction on the number of attempts.	3.1.3 Required Actions C.1 and C.2	3.1.3.6 Action a.1.b)	4, 6
L.11	Deletes the requirements of CTS 3.1.3.6 Action a.1.a)2) since they are not necessary for ensuring recoupling of the control rod.	N/A	3.1.3.6 Action a.1.a)2)	4
L.12	Deletes the requirements to verify control rod coupling by observing any indicated response of the nuclear instrumentation during withdrawal of a control rod, since a response to control rod motion on nuclear instrumentation is indicative that a control rod is following its drive, but gives no indication as to whether or not a control rod is coupled.	N/A	3.1.3.6 Action a.1.a)1), 4.1.3.6	3, 4
L.13	CTS 3.1.3.7 Action a.1 provides methods for determining the position of a control rod whose position indicator is inoperable. These methods are moved to the Bases. In addition, the 12 hour requirement to verify no rod drift alarm is being deleted. The ITS will require the rod position to be determined every 24 hours.	N/A	3.1.3.7 Action a.1.(c)	4

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.14	Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE during the performance of the control rod movement tests, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SR 3.1.3.2, SR 3.1.3.3, and SR 3.1.3.5.	3.1.3	4.1.3.7.b, 4.1.3.7.c, 4.1.3.7.d	3
3.1.4, Control Rod Scram Times				
L.1	Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell.	SR 3.1.4.4	4.1.3.2.a	3
3.1.5, Control Rod Scram Accumulators				
L.1	Provides the option to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient is proposed in lieu of declaring the control rod inoperable. The option for declaring the control rod with an inoperable accumulator "slow" is restricted to control rods not previously known to be slow. Additionally, with more than one accumulator inoperable, in lieu of the CTS requirement to declare the associated control rod inoperable immediately and to insert and disarm the associated control rod drive or shutdown the unit, actions will allow the affected control rods to be declared slow or inoperable, as applicable, in 1 hour. The 1 hour will only allowed provided the control rod drive header pressure alone is sufficient to insert control rods if a scram is required.	3.1.5 Required Actions A.1, B.2.1, B.2.2, C.1, and C.2	3.1.3.5 Action a.1.a)2)	4, 6
L.2	Revises the requirement to allow 20 minutes to ensure control rod accumulator charging water pressure is adequate to support maintaining the remaining accumulators OPERABLE.	3.1.5 Required Action B.1	3.1.3.5 Action a.2.a)	4, 6
3.1.6, Rod Pattern Control				

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.7, Standby Liquid Control System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification of flow through one SLC subsystem from pump into the reactor vessel; and verification that all heat traced piping between the storage tank and the storage tank outlet valves is unblocked.	SR 3.1.7.8, SR 3.1.7.9	4.1.5.c.1, 4.1.5.c.4	10
L.1	Deletes the requirement that the SLC System be OPERABLE in MODE 5 with any control rod withdrawn, since only a single control rod can be withdrawn and adequate SHUTDOWN MARGIN prevents criticality under these conditions.	N/A	LCO 3.1.5	2
L.2	Deletes the requirement to test both SLC pumps every 31 days, since testing the SLC pumps in accordance with the Inservice Testing Program provides adequate assurance that the pumps will perform their required function.	N/A	4.1.5.b.1	3
L.3	Deletes the requirement that the SLC flow verification, SLC pump flow and discharge pressure verification, and the heat traced piping unblocked Surveillances be performed "during shutdown."	N/A	4.1.5.c	3
L.4	Deletes the requirement to demonstrate the heaters OPERABLE by verifying a temperature rise in the storage tank; the daily verification of the solution temperature provides an adequate check on the capability of the storage tank heaters to maintain solution temperature.	N/A	4.1.5.c.5	3
3.1.8, SDV Vent and Drain Valves				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillance: Verification that the vent and drain valves close in $\leq 30$ seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset.	SR 3.1.8.3	4.1.3.1.4	10

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DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support				
L.1	Deletes the requirement for the CRD housing support to be in place, since it is included in the OPERABILITY requirements for control rods and is controlled by plant configuration management.	1.0 Operable-Operability definition, 3.1.3	3/4.1.3.8	1
Current Specification 3/4.1.6, Economic Generation Control System				
NONE	NONE	NONE	NONE	NONE

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SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE				
L.1	The requirement to verify APLHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In addition, allows the Applicability to be entered (i.e., $\geq$ 25% RTP) prior to performing the Surveillance.	SR 3.2.1.1	4.2.1.b	3
L.2	Deletes requirement to verify APLHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.1.c	3
3.2.2, MINIMUM CRITICAL POWER RATIO				
L.1	Extends the Completion Time to restore MCPR to within limits, when operating in a condition not specified in the COLR, to 2 hours, to allow appropriate actions to be evaluated by the operator and completed in a timely manner.	3.2.2 ACTION A	3.2.3 Action b	6
L.2	The requirement to verify MCPR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In addition, allows the Applicability to be entered (i.e., $\geq$ 25% RTP) prior to performing the Surveillance.	SR 3.2.2.1	4.2.3.1.b	3
L.3	Deletes requirement to verify MCPR be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.3.1.c	3

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SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.2.3, LINEAR HEAT GENERATION RATE				
L.1	The requirement to verify LHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In addition, allows the Applicability to be entered (i.e., $\geq$ 25% RTP) prior to performing the Surveillance.	SR 3.2.3.1	4.2.4.b	3
L.2	Deletes requirement to verify LHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.2.4.c	3

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SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.3.1.1, RPS Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST, the verification of the bypass setpoints for the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions, and the RPS RESPONSE TIME TEST.	SR 3.3.1.1.15, SR 3.3.1.1.16, SR 3.3.1.1.17	4.3.1.2, Table 4.3.1.1-1 Note (i), 4.3.1.3	10
LD.2	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch—Shutdown Position Function.	SR 3.3.1.1.12	4.3.1.1 for Table 4.3.1.1-1 Functional Unit 11	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.13 for Functions 1.a, 4, 5, 6, 7, 8, and 9, SR 3.3.1.1.14 for Function 2.b	4.3.1.1 for Table 4.3.1.1-1 Functional Units 1.a, 2.b, 4, 5, 7, 8, 9, and 10	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.1.1- 1	Table 2.2.1-1	1
L.1	Deletes the IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 since during normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn.	N/A	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1.a, 1.b, 11, and 12, Table 3.3.1- 1 Actions 2, 7, and 8	1

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L.2	CTS requirements for IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. Furthermore, CTS Action 9 also to lock the reactor mode switch in Shutdown are deleted, since once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown.	Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 1.a, 1.b, 11, and 12, Table 3.3.1-1 Actions 3 and 9	2
L.3	Deletes the APRM Neutron Flux—High, Setdown and APRM Inoperative requirements for MODE 3 since during normal operation in MODE 3, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn.	N/A	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 2.a and 2.d, Table 3.3.1-1 Action 2	1
L.4	Deletes the APRM Neutron Flux — High, Setdown and APRM Inoperative requirements for MODE 5, since APRMs are not necessary for safe operation of the plant while operating in MODE 5 with the mode switch in "Refuel."	N/A	Tables 3.3.1-1 and 4.3.1.1-1 Functional Units 2.a and 2.d	1
L.5	Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the APRM Flow Biased Simulated Thermal Power — Upscale Function and APRM Fixed Neutron Flux — High Function "Within 4 hours prior to startup, if not performed within the previous 7 days," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the APRM Functions are Operable.	N/A	Table 4.3.1.1-1 including footnote (c)	3
L.6	The CTS Scram Discharge Volume Water Level trip Function Applicability is modified from requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability.	Table 3.3.1.1-1 Functions 7.a and 7.b, including Note (a), 3.3.1.1 ACTION H	Table 3.3.1-1 Functional Unit 8, including Note (h), Table 3.3.1-1 Action 3	2

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SECTION 3.3 - INSTRUMENTATION

L.7	Deletes the requirement to initiate a reduction in THERMAL POWER within 15 minutes, since immediate power reduction may not always be the conservative method to assure safety.	N/A	Table 3.3.1-1 Action 6	5
L.8	Extends the time to reach < 25% RTP from 2 hours to 4 hours.	3.3.1.1 Required Action E.1	Table 3.3.1-1 Action 6	6
L.9	ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER $\geq$ 25% RTP	SR 3.3.1.1.2 Note	Table 4.3.1.1-1 footnote (d)	3
L.10	Deletes the requirement to post a notification on the reactor control panel if any required APRM must be adjusted to be within 2% of RATED THERMAL POWER.	N/A	Table 4.3.1.1-1 footnote (d)	5
L.11	Deletes the response time for the RPS APRM Flow Biased Simulated Thermal Power - Upscale Function, since it is not credited in any safety analysis.	N/A	4.3.1.3 for Table 3.3.1-1 Functional Unit 2.b	3
3.3.1.2, SRM Instrumentation				
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SRM CHANNEL CALIBRATION.	SR 3.3.1.2.7	4.3.7.6.a.2	10
L.1	CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.3) if two or more required SRMs become inoperable. The words "or more" are added (ITS 3.3.1.2 Condition A) to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed.	3.3.1.2 Condition A, 3.3.1.2 ACTION B	N/A	5
L.2	Deletes the CTS requirement to "lock" the mode switch in Shutdown.	N/A	3.3.7.6 Action b	8

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L.3	ITS provides an exception to Operability requirements for CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements for the SRMs until 12 hours after the IRMs are on Range 2 or below.	SR 3.3.1.2.6 Note, SR 3.3.1.2.7 Note	4.3.7.6.a.2, 4.3.7.6.b	3
L.4	Deletes the "prior to" frequency from CTS Surveillances involving the reactor mode switch, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.1 and CTS 4.0.4.	SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.4	4.3.7.6.b.1, 4.9.2.b.1, 4.9.2.c.1	3
L.5	Modifies the requirement to fully insert all insertable control rods in MODE 5 if one or more required SRMs are inoperable to only require those control rods in core cell containing one or more fuel assemblies, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.3.1.2 Required Action E.2	3.9.2 Action	4
L.6	Reduces the number of SRMs required to be OPERABLE when in MODES 3 and 4 from three to two, consistent with the CTS Action.	Table 3.3.1.2-1	LCO 3.3.7.6, 3.3.7.6 Action b	1
L.7	Revises the CTS Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore the ITS provides a Required Action to immediately initiate action and continue attempts to insert all insertable control rods.	3.3.1.2 Required Action E.2	3.9.2 Action	4
L.8	Adds a Note that eliminates requirements for SRMs outside the fueled region to be Operable in MODE 5, during a spiral offload or reload, since monitors in these positions are not capable of monitoring normal changes in neutron flux. Similarly, SRM count rate requirements are deleted.	Table 3.3.1.2-1 Note (b)	4.9.2.a.3	1
3.3.2.1, Control Rod Block Instrumentation				

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LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.2.1-1	Table 3.3.6-2	1
L.1	Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "Within 24 hours prior to startup, if not performed within the previous 7 days," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable.	N/A	Table 4.3.6-1 Note (b)	3
L.2	CTS does not allow a reactor startup with the RWM inoperable. The ITS will allow one reactor startup to commence once per calendar year with the RWM inoperable. In addition, the ITS will also allow a startup to continue if the RWM becomes inoperable after the first rod is pulled (at least 12 rods must be withdrawn prior to allowing the startup to continue if the RWM becomes inoperable and not crediting this as the one startup with the RWM inoperable).	3.3.2.1 ACTION C	3.3.6 Actions a and c	5
L.3	Deletes the restriction that prohibits continued operation if more than 3 rods in any RWM group are inoperable when the RWM is required to be OPERABLE, since CTS 3.1.3.1 Actions a.1.a) and b.1.a.1) (ITS 3.1.3 ACTION D) provide necessary constraints on multiple rod inoperability relying on separation of the rods by at least two control cells in all directions.	3.1.3 ACTION D	3.1.4.1 Action b.2	5
L.4	CTS requirements for RWM Channel Functional Testing are modified. ITS SRs extend the CHANNEL FUNCTIONAL TEST to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM CHANNEL FUNCTIONAL TEST after any control rod is withdrawn at $\leq 10\%$ RTP in MODE 2 and after THERMAL POWER is $\leq 10\%$ RTP in MODE 1.	SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note	4.1.4.1.a, b, c	3
L.5	Deletes CTS Action that requires verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the Surveillance Requirement that requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN.	N/A	3.1.4.3 Action a, 4.1.4.3.b	3, 4

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SECTION 3.3 - INSTRUMENTATION

3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.2.2.4	4.3.8.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.2.2.3	4.3.8.1 for Table 4.3.8.1-1 Trip Function a	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Value to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.2.2.3	Table 3.3.8-2	1
L.1	Modifies the Applicability for the Feedwater System and Main Turbine Water Level Trip Instrumentation from MODE 1 to when THERMAL POWER is $\geq$ 25% RTP, and the current shutdown action to only require power to be reduced to $<$ 25% RTP. In addition, the time to achieve this power level has been reduced from 6 hours to 4 hours.	3.3.2.2 Applicability, 3.3.2.2 ACTION C	3.3.8 Applicability, 3.3.8 Action c	2, 5, 6
L.2	CTS requires reduction in Thermal Power if the Feedwater System Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker or feedwater turbine stop valve.	3.3.2.2 Required Action C.1	N/A	5
3.3.3.1, Post Accident Monitoring Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.3.1.2	4.3.7.5 for Table 4.3.7.5-1 Instruments 1-4, 6, and 10	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.1.2	4.3.7.5 for Table 4.3.7.5-1 Instruments 1-4, 6, and 10	10
L.1	Adds a Note that LCO 3.0.4 is not applicable to the ITS 3.3.3.1 ACTIONS.	3.3.3.1 ACTIONS Note 1	N/A	7
L.2	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	3.3.3.1 Surveillance Requirements Note 2	N/A	6
L.3	In the event the number of OPERABLE channels is less than the Required Number of Channels requirement, the CTS requires the inoperable channels to be restored within 7 days. In the event the number of OPERABLE channels is less than the Minimum Channels OPERABLE requirement, the CTS requires the inoperable channels to be restored within 48 hours. The ITS extends these Completion Times to 30 days and 7 days, respectively.	3.3.3.1 ACTIONS A and C	Table 3.3.7.5-1 Actions 80a and 80b	6
L.4	The CTS Actions for one channel inoperable in one or more Functions for more than the allowed outage time is revised from requiring a shutdown to requiring a Special Report.	3.3.3.1 ACTION B	Table 3.3.7.5-1 Actions 80a and 82a	5
L.5	With one or two primary containment gross gamma radiation monitors inoperable, the CTS requires initiation of the alternate method of monitoring within 72 hours and restoration of both channels to OPERABLE status within 7 days. With one monitor inoperable, the ITS provides 30 days for the restoration of the monitor prior to initiating the action in accordance with Specification 5.6.6 alternate method of monitoring and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating the alternate method of monitoring.	3.3.3.1 ACTIONS A, B, C, D, and F	Table 3.3.7.5-1 Action 81	5, 6
3.3.3.2, Remote Shutdown Monitoring System				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.3.2.2	4.3.7.4 for Table 4.3.7.4-1	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.2.2	4.3.7.4 for Table 4.3.7.4-1	10
L.1	Extends from 7 days to 30 days the allowed outage time for inoperable Remote Shutdown Monitoring System instrumentation.	3.3.3.2 ACTION A	3.3.7.4 Action a	6
L.2	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances.	3.3.3.2 Surveillance Requirements Note	N/A	6
L.3	CTS requires a Channel Check to be performed for deenergized instruments during normal operation. No specific acceptance criteria would apply to a Channel Check performed on instrumentation that is not showing proper indication. The ITS excludes the Channel Check requirement for deenergized channels.	SR 3.3.3.2.1	4.3.7.4 for Table 4.3.7.4-1 Instruments 1, 2, 3, 4, and 7	3
3.3.4.1, EOC-RPT Instrumentation				
LB.1	Extends from 12 hours to 72 hours the allowed out of service time when one or more channels are inoperable but EOC-RPT trip capability is maintained.	3.3.4.1 ACTION A	3.3.4.2 Actions b and c.1	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, verification that the Turbine Stop Valve—Closure and Turbine Control Valve—Fast Closure Functions are not bypassed when THERMAL POWER is $\geq$ 25% RTP, and EOC-RPT RESPONSE TIME TEST (except the breaker arc suppression time).	SR 3.3.4.1.3, SR 3.3.4.1.4, SR 3.3.4.1.5	4.3.4.2.2, Table 4.3.4.2.1-1 footnote (a), 4.3.4.2.3	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.1.2	4.3.4.2.1 for Table 4.3.4.2.1-1 Trip Functions 1 and 2	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.4.1.2	Table 3.3.4.2-2	1
L.1	The time provided to restore channels to Operable status if both Trip Systems are affected, or the time to apply the MCPR EOC-RPT inoperable limit, has been extended from 1 hour to 2 hours, consistent with the time provided to restore a MCPR limit.	3.3.4.1 ACTION B	3.3.4.2 Action e	6
L.2	CTS require a reduction in Thermal Power to < 25% RTP if the EOC-RPT instrumentation is not restored or if the MCPR penalty is not applied. ITS will allow removal of the associated recirculation pump fast speed breaker from service in lieu of reducing Thermal Power to < 25% RTP. In addition, conforming changes are made to the CTS Applicability to require the EOC-RPT instrumentation to be Operable when Thermal Power is $\geq$ 25% RTP with any recirculation pump in fast speed.	3.3.4.1 Applicability, 3.3.4.1 Required Action C.1	N/A	5, 2
L.3	When two turbine stop valve channels or two turbine control valve channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restores the single failure capability and provides the required initiation capability of the instrumentation.	3.3.4.1 Required Action A.1	3.3.4.2 Action c.2	5
L.4	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 2 hour Completion Time to restore trip capability when one or more Functions have lost EOC-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the EOC-RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip.	3.3.4.1 ACTION B	3.3.4.2 Actions d and e	5, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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3.3.4.2, ATWS-RPT Instrumentation				
LB.1	Extends from 24 hours to 14 days the allowed out of service time when one or more channels are inoperable provided ATWS-RPT trip capability in both Functions is maintained.	3.3.4.1 ACTION A	3.3.4.2 Actions b and c.1	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.4.2.4	4.3.4.1.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.2.3	4.3.4.1.1 for Table 4.3.4.1-1 Trip Functions 1 and 2	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.4.2.3	Table 3.3.4.1-2	1
L.1	When one reactor vessel water level channel and one reactor vessel pressure channel in the same Trip System are inoperable or when two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS addresses only channels and will require the inoperable channels be restored to operable status. ITS also provides an option to place inoperable channels in the tripped condition.	3.3.4.2 ACTION A	3.3.4.1 Actions c.1 and c.2	5

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L.2	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore trip capability when one Function has lost ATWS-RPT trip capability and a 1 hour Completion Time when both Functions have lost ATWS-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS- RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. ITS extends the time for repair to 14 days when either the pressure or level functions are inoperable in one trip system provided the other trip system retains trip capability.	3.3.4.2 ACTIONS B and C	3.3.4.1 Actions d and e	5, 6
L.3	CTS require the unit to be in Mode 2 if the ATWS-RPT instrumentation is not restored. ITS will allow removal of the associated recirculation pump from service in lieu of being in MODE 2 within 6 hours.	3.3.4.2 Required Action D.1	N/A	5
3.3.5.1, ECCS Instrumentation				
LB.1	The CTS allowance to delay entering the associated Action statement when performing required Surveillances is clarified to allow the CTS Functions to be inoperable and delay entering the associated Actions for 6 hours, regardless of the remaining ECCS initiation capability of the Function. For these three Functions, loss of one channel results in a loss of HPCS initiation capability.	3.3.5.1 Surveillance Requirements Note 2	Table 3.3.3-1 footnote (a) for Trip Functions C.1.c, C.1.f, C.1.g, and C.1.h	6
LB.2	CTS Table 3.3.3-1 Action 38.b for LPCS and LPCI Injection Valve Reactor Pressure—Low (Permissive) Functions requires the two inoperable channels to be restored to OPERABLE status within one hour or to declare the associated ECCS systems inoperable. The allowed out-of-service time has been extended to 24 hours, provided the other Division of low pressure ECCS is Operable.	3.3.5.1 ACTION D	Table 3.3.3-1 Action 38.b for Trip Functions A.1.e and B.1.g	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Functions, and the ECCS RESPONSE TIME test.	SR 3.3.5.1.5	4.3.3.2, 4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.h, A.2.h, B.1.f, B.2.f, and C.1.h, 4.3.3.3	10
LE.1	Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.1.4	4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.a, A.1.b, A.1.d, A.1.e, A.1.f, B.1.a, B.1.b, B.1.c, B.1.d, B.1.g, A.2.a, A.2.b, A.2.c, A.2.d, A.2.e, A.2.f, A.2.h, B.2.a, B.2.b, B.2.c, B.2.d, B.2.e, B.2.g, C.1.a, C.1.b, C.1.c, and C.1.f	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.5.1-1	Table 3.3.3-2	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.1	CTS requires restoration of an ADS Trip System to Operable status when it is inoperable. CTS requires an inoperable ADS Reactor Vessel Water Level - Low, Level 3 (Permissive) channel to be restored to Operable status. ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability, and providing the required initiation capability of the instrumentation.	3.3.5.1 Required Action E.2	3.3.3 Action c, Table 3.3.3-1 Action 32	5
L.2	Increases from 122 psig to 150 psig the pressure at which ADS is required to be OPERABLE to provide consistency of the OPERABILITY requirements for all ECCS and RCIC equipment.	3.3.5.1 Applicability	Table 3.3.3-1 footnote (#), CTS Table 4.3.3.1-1 footnote #, and CTS 3.3.3 Action c	2
L.3	<p>CTS Table 3.3.3-1 Action 30.b requires the associated ECCS to be declared inoperable immediately when more than one channel of a Trip Function is inoperable. CTS Table 3.3.3-1 Action 35.b requires the HPCS to be declared inoperable when channels in both trip systems are inoperable. These Actions apply to LPCS, LPCI, and ADS Reactor Vessel Water Level - Low, Low, Low, Level 1, HPCS Reactor Vessel Water Level - Low, Low, Level 2 , LPCS, LPCI, ADS, and HPCS Drywell Pressure - High .</p> <p>The ITS will allow 24 hours, 96 hours, or 8 days, as applicable to place inoperable channels in trip when two channels of a Function are inoperable, prior to declaring the associated ECCS inoperable, provided ECCS initiation capability is maintained. However, this 24 hour, 96 hour, or 8 day time will only be allowed if the redundant ECCS (in the case of LPCS and LPCI) or trip system (in the case of ADS and HPCS) is maintaining initiation capability.</p>	3.3.5.1 ACTIONS B and E	Table 3.3.3-1 Actions 30.b and 35.b	5, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.4	CTS Table 3.3.3-1 Action 38.a, requires, when one LPCS and LPCI A or one LPCI B and C Injection Valve Reactor Pressure-Low (Permissive) channel is inoperable, the inoperable channel must be removed within 24 hours. This instrumentation provides a permissive to open the LPCI and LPCS injection valves when the reactor pressure has decreased to an acceptable pressure, such that opening the injection valves will not result in overpressurization of the LPCI or LPCS Systems. This requirement has been deleted. The Action assumes the channel fails in the tripped condition, but this is not always true; it can fail such that a trip would not occur. The requirement to remove the inoperable channel within 24 hours is not necessary to ensure the LPCI and LPCS Systems are not overpressurized.	N/A	Table 3.3.3-1 Action 38.a	4
L.5	CTS 4.4.2.2, in part, verifies that the low-low set function does not interfere with the OPERABILITY of the ADS by a CHANNEL CALIBRATION. The logic channels associated with the low-low set function are electrically interconnected. However, the only possible impact that could prevent ADS operation is in the common portion of the logic. This logic is energize to operate. Thus, the non-interference requirement for the ADS function is demonstrated through a periodic functional test of the low-low set function, and the CHANNEL CALIBRATION for this purpose is being deleted.	N/A	4.4.2.2	3
L.6	CTS Table 3.3.3-1 Action 31, which applies to the Functions that control the ECCS minimum flow valves, requires the inoperable channel to be placed in trip. This requirement has not been included in the ITS since placing a channel in trip does not compensate for the inoperability, and it may be a less safe action to take. The ITS only requires the channel to be restored.	3.3.5.1 ACTION D	Table 3.3.3-1 Action 31	5
3.3.5.2, RCIC System Instrumentation				
LB.1	The CTS allowance to delay entering the associated Action statement when performing required Surveillances is clarified to allow the Reactor Vessel Water Level - High, Level 8 and Manual Initiation Functions to be inoperable and delay entering the associated Actions for 6 hours, regardless of the remaining RCIC initiation capability of the Function. For these two Functions, loss of one channel results in a loss of RCIC initiation capability.	3.3.5.2 Surveillance Requirements Note 2	Table 3.3.5-1 footnote (a) for Functional Units b and c	6

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SECTION 3.3 - INSTRUMENTATION

LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Function.	SR 3.3.5.2.4	4.3.5.2, 4.3.5.1 for Table 4.3.5.1-1 Functional Unit c	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.2.3	4.3.5.1 for Table 4.3.5.1-1 Functional Units a and b	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.5.2-1	Table 3.3.5-2	1
L.1	When one or more inoperable channels exist, in place of the CTS requirement to declare the RCIC System inoperable, the ITS provides an option to place all inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability, and providing the required initiation capability of the instrumentation.	3.3.5.2 Required Action B.2	Table 3.3.5-1 Action 50.b	5
3.3.6.1, Primary Containment Isolation Instrumentation				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LB.1	<p>The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS requires a channel to be restored to OPERABLE status within 6 hours if placing an inoperable channel in trip causes the Trip Function to occur. CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS require the inoperable channel to be restored to OPERABLE status within 1 hour, if placing the inoperable channel in trip causes the Trip Function to occur. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system.</p>	3.3.6.1 ACTION A	3.3.2 Action b.1.a), 3.3.2 Action b.1 footnote *, 3.3.2 Action c.2.a)1), 3.3.2 Action c.1, 3.3.2 Actions c.1 and c.2.a) footnote ***	5, 6
LB.2	<p>The CTS allows a delay in entering the associated Action statement when performing required Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trips systems that have only one channel, the 8 hour allowance has been reduced to 6 hours and the wording has been simplified to require trip capability of the Function to be maintained. The reduction in the allowed out of service time from 8 hours to 6 hours is consistent with the specified reliability analyses. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability."</p>	3.3.6.1 Surveillance Requirements Note 2	Table 3.3.2-1 Note (b)	6
LD.1	<p>Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST, the ISOLATION SYSTEM RESPONSE TIME test, and the CHANNEL FUNCTIONAL TEST for the RWCU SLCS Initiation Function and the Manual Initiation Functions.</p>	SR 3.3.6.1.5, SR 3.3.6.1.6	4.3.2.2, 4.3.2.3, 4.3.2.1 for Table 4.3.2.1-1 Trip Functions A.3.d and B	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.3 - INSTRUMENTATION

LE.1	Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.1.4	4.3.2.1 for all Table 4.3.2.1-1 Trip Functions except A.1.c.3)	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.1-1	Table 3.3.2-2	1
L.1	CTS requires a unit shutdown when a Reactor Vessel Water Level—Low, Level 3 or a Reactor Vessel Water Level — Low Low Low, Level 1 channel is not placed in trip. These Functions actuate TIP Guide Tube Ball Valves and Drywell Pneumatic Valves, respectively, as well as other primary containment isolation valves. The ITS allows isolation of the affected penetration instead of requiring a unit shutdown, when only these valves are affected.	3.3.6.1 ACTION F	Table 3.3.2-1 Action 20	5
L.2	CTS requires a unit shutdown when a Reactor Vessel Water Level — Low Low Low, Level 1 channel is not placed in trip. The ITS allows isolation of the affected main steam line in lieu of shutting down the unit.	3.3.6.1 Required Action D.1	Table 3.3.2-1 Action 20	5
L.3	CTS Table 3.3.2-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 6 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 6 hours to 12 hours to allow for more orderly power reduction.	3.3.6.1 ACTION D	Table 3.3.2-1 Action 21	5, 6
L.4	The Applicability of the Standby Liquid Control System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements.	Table 3.3.6.1-1 Function 4.1	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function 3.d	2
L.5	Not used.	N/A	N/A	N/A

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.6	The MODE 1 and 2 Applicability requirements for the Reactor Vessel Water Level—Low, Level 3, have been deleted for the RHR SDC System Group 6 valves.	N/A	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function A.6.a	2
L.7	The CTS requires locking the affected system isolation valves closed when the Reactor Vessel Pressure—High Function is inoperable. The ITS only requires closure of the valve, i.e., isolating the penetration; locking is not required.	3.3.6.1 Required Action F.1	Table 3.3.2-1 Action 25	4
L.8	The CTS action, associated with the Reactor Vessel Water Level—Low, Level 3 Function, to lock the affected system isolation valves within one hour and declare the affected system inoperable has been modified to immediately initiate action to restore channel to OPERABLE status or initiate action to isolate the Residual Heat Removal Shutdown Cooling System.	3.3.6.1 Required Actions J.1 and J.2	Table 3.3.2-1 Action 25	5
L.9	CTS Table 3.3.2-1 ACTION 26 allows 24 hours to restore the Manual Initiation Function to OPERABLE status, provided that the Manual Initiation Function is OPERABLE for each other group valve, inboard or outboard, as applicable, in each line, otherwise the Manual Initiation Function must be restored to OPERABLE status within 8 hours. The restrictions of the allowed out of service time have been deleted and the ITS allows the Manual Initiation Functions to be restored to OPERABLE status in 24 hours, regardless of the status of the manual isolation function of the other valve group. The time allowed in CTS Table 3.3.2-1 ACTION 26 to isolate the associated penetration if a Manual Isolation Function is inoperable has also been extended from 9 hours (8 hours to restore the channel and 1 hour to isolate the penetration) to 24 hours in the ITS.	3.3.6.1 ACTION G	Table 3.3.2-1 Action 26	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.10	CTS Table 3.3.2-1 requires a Manual Initiation channel (one channel per valve) to be OPERABLE for Groups 3, 8, and 9 inboard and outboard valves. These Function channels are currently being satisfied via each valve's individual control switch. The only RCIC Manual initiation Function available is for the Group 8 outboard isolation valve and this Function only operates with a coincident Reactor Vessel Water Level—Low Level 2 signal as indicated in footnote (h). The Manual Initiation Function for this Group 8 outboard Function is retained in ITS 3.3.6.1 as indicated in Table 3.3.6.1-1 Function 3.j and footnote (b). The requirements for individual control switches are not included in the ITS, since they are not credited in any design bases accident or transient analysis.	N/A	Table 3.3.2-1 Trip Functions B.5 and B.6	1
L.11	The ITS allows the associated SLC subsystem to be declared inoperable in lieu of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped.	3.3.6.1 Required Action I.1	Table 3.3.2-1 Action 22	4
3.3.6.2, Secondary Containment Isolation Instrumentation				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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LB.1	<p>The CTS requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for one Trip System, the inoperable channel(s) must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS requires a channel to be restored to OPERABLE status within 6 hours if placing an inoperable channel in trip causes the Trip Function to occur. CTS also requires that, when the number of OPERABLE channels is less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, then after placing the inoperable channel(s) in one trip system in the tripped condition in 1 hour, the inoperable channel(s) in the remaining trip system must be placed in the tripped condition within 1 hour for trip functions without an OPERABLE channel. In addition, the CTS require the inoperable channel to be restored to OPERABLE status within 1 hour, if placing the inoperable channel in trip causes the Trip Function to occur. The ITS does not include these requirements but does establish the requirement to place the inoperable channel(s) in trip within either 12 or 24 hours, irrespective of the number of inoperable channels in a trip system.</p>	3.3.6.2 ACTION A	3.3.2 Action b.1.a), 3.3.2 Action b.1 footnote *, 3.3.2 Action c.2.a)1), 3.3.2 Action c.1, 3.3.2 Actions c.1 and c.2.a) footnote ***	5, 6
LB.2	<p>The CTS allows a delay in entering the associated Action statement when performing required Surveillances "provided at least one other OPERABLE channel in the same trip system is monitoring that parameter." These words do not ensure the trip capability of the Function is maintained for all logic system designs. In addition, for those trips systems that have only one channel, the 8 hour allowance has been reduced to 6 hours and the wording has been simplified to require trip capability of the Function to be maintained. The reduction in the allowed out of service time from 8 hours to 6 hours is consistent with the specified reliability analyses. Therefore, the Note has been modified to state "provided the associated Function maintains isolation capability."</p>	3.3.6.1 Surveillance Requirements Note 2	Table 3.3.2-1 Note (b)	6
LD.1	<p>Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for the Manual Initiation Function.</p>	SR 3.3.6.2.4	4.3.2.2, 4.3.2.1 for Table 4.3.2.1-1 Trip Functions B.3 and B.4, 4.6.5.3.d.2	10

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LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.2.3	4.3.2.1 for Table 4.3.2.1-1 Trip Functions A.2.a, A.2.b, A.2.c, and A.2.d	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.2-1	Table 3.3.2-2	1
L.1	ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.3 entry would be required, since no further Actions are provided.	3.3.6.2 Required Actions C.1.2 and C.2.2	Table 3.3.2-1 Action 24	4, 5
L.2	The CTS allows 24 hours to restore an inoperable Manual Initiation channel associated with one group if the other Manual Initiation channel is OPERABLE, otherwise only 8 hours is allowed to restore the channels. If this cannot be met the plant must be in MODE 3 in 12 hours and MODE 4 within the following 24 hours, or the affected system isolation valves must be closed within an hour and the affected systems must be declared inoperable. An additional option has been added to place the associated standby gas treatment subsystem(s) in operation in lieu of requiring it to be declared inoperable.	3.3.6.2 Required Action C.2.1	Table 3.3.2-1 Action 26	5
L.3	Isolation of secondary containment on Reactor Vessel Water Level—Low Low, Level 2, is required by the CTS to be Operable during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS.	N/A	Tables 3.3.2-1 and 4.3.2.1-1, Trip Function A.2.c Applicability, including footnote #	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.4	The CTS, for Manual Initiation Trip Functions B.3 and B.4, requires the affected system isolation valves to be closed and to declare the affected system inoperable. For this Specification these actions are considered to be applicable to the Secondary Containment Isolation Valves (SCIVs) and Standby Gas Treatment (SGT) System. The ITS Required Actions, as they relate to the SCIVs, allow either of these actions; isolating the associated penetration flow path(s) or declaring the affected components inoperable (and taking the appropriate actions in the associated system Specification).	3.3.6.2 Required Actions C.1.1 and C.1.2	Table 3.3.2-1 Action 26.b	5
3.3.7.1, CRAF System Instrumentation				
LB.1	If the number of OPERABLE channels per trip system is one less than the minimum required, the CTS requires an inoperable channel to be placed in trip within one hour. The ITS extends this time to 6 hours, provided the CRAF subsystem initiation capability in both trip systems is not lost.	3.3.7.1 ACTION A	Table 3.3.7.1-1 Action 70.a	6
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.7.1.4	4.7.2.d.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.7.1.3	4.3.7.1 for Table 4.3.7.1-1 Instrumentation a	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Value to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.7.1.3	Table 3.3.7.1-1	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.1	Revises the Applicability of CTS 3/4.7.2 and CTS 3.3.7.1 for the main control room atmospheric control system radiation monitoring subsystem from Operational Conditions 1, 2, 3, 4, and 5 (the MODE 4 applicability only applies to CTS 3/4.7.2), and when irradiated fuel is being handled in secondary containment to MODES 1, 2, and 3, during movement of irradiated fuel assemblies in secondary containment, during CORE ALTERATIONS, and during operations with the potential for draining the reactor vessel.	3.3.7.1	3/4.7.2, 3.3.7.1, Tables 3.3.7.1-1 and 4.3.7.1-1	2
L.2	With two channels in a trip system inoperable, the CTS requires the CRAF System to be placed in the pressurization mode within 7 days, 6 hours (total time) after two channels in a trip system are inoperable. The ITS provides a total time of 7 days, 7 hours before the CRAF subsystem must be in the pressurization mode. With one channel in a trip system inoperable, the CTS requires the CRAF System to be tripped within 1 hour or placed in operation within the next 1 hour ( 2 hours total time to be in operation). The ITS provides an additional allowance to declare the CRAF subsystem inoperable within 1 hour when a channel is not tripped. Once declared inoperable, the ITS allows an additional 7 days to place the CRAF in operation.	3.3.7.1 ACTIONS A and B, 3.7.4 ACTIONS A and C, 3.3.7.1 ACTION B	Table 3.3.7.1-1 Action 70.b, Table 3.3.7.1-1 Actions 70.a and 70.c	6
3.3.8.1, Loss of Power Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.8.1.3, SR 3.3.8.1.5	4.3.3.2, 4.3.3.1 for Table 4.3.3.1-1 Trip Functions D.1 and D.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.1.4	4.3.3.1 for Table 4.3.3.1-1 Trip Function D.1	10

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LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.8.1-1	Table 3.3.3-2 Trip Functions D.1 and D.2	1
3.3.8.2, RPS Electric Power Monitoring				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test.	SR 3.3.8.2.3	4.8.3.4.b	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.2.2	4.8.3.4.b	10
LF.1	Revises the Current Technical Specifications (CTS) Allowable Values to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.8.2.2	4.8.3.4.b	1
L.1	Changes the Applicability from at all times to only include MODES 1, 2, and 3 and those MODES or Conditions when the RPS, RHR SDC isolation, secondary containment isolation, or SGT System initiation functions (which are all the Technical Specification required equipment powered from the RPS logic buses) are required.	3.3.8.2 Applicability	3.8.3.4 Applicability	2
L.2	Extends the allowed out of service time for two inoperable RPS electric power monitoring assemblies from 30 minutes to 1 hour to provide sufficient time for plant personnel to take corrective actions.	3.3.8.2 Required Action B.1	3.8.3.4 Action b	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.3 - INSTRUMENTATION

L.3	The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG set or alternate power supply is not removed from service (which de-energizes the associated RPS bus). Thus, CTS 3.0.3 is required to be entered. However, since CTS 3.0.3 is not applicable in MODES 4 and 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In lieu of these two requirements, the ITS provides new ACTIONS if the Required Actions of Condition A or B are not met in MODES other than MODES 1, 2, and 3. The ITS requires action to be initiated to restore one EPA to OPERABLE status for each RPS logic bus or to isolate the Residual Heat Removal (RHR) Shutdown Cooling (SDC) System; requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies; and requires action to be taken to isolate the affected secondary containment penetration flow paths and start the associated SGT subsystems, or to declare the associated SCIVs and SGT subsystems inoperable.	3.3.8.2 ACTIONS D, E, and F	N/A	5
Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.12, Loose Part Detection System				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.4.1, Recirculation Loops Operating				
L.1 Open	<del>The time to adjust power distribution limits and Reactor Protection System and Control Rod Block instrumentation Allowable Values for single loop operation is increased from 4 hours to 12 hours.</del>	3.4.1 ACTION G	3.4.1.1 Action a.1	6
L.2	Extends the time to reach MODE 3 from 6 hours to 12 hours in the event no recirculation loops are in operation.	3.4.1 ACTION D	3.4.1.1 Action b.2, 3.4.1.5 Action a.2.c)	6
L.3	CTS 4.4.1.3 requires the recirculation loop flow mismatch to be verified within the limits once per 24 hours when in Operational Condition 1 and 2 during two recirculation loop operation. Since CTS 4.4.1.3 cannot be performed prior to its Applicability (as required by CTS 4.0.4) if shifting from single loop to two loop operation while in MODE 1 or 2, a note is added providing an allowance for time to initiate Frequency to avoid intentional entry into the ACTIONS each time the second recirculation pump is started.	SR 3.4.1.1 Note	N/A	3
3.4.2, Flow Control Valves				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification each FCV fails "as is" on loss of hydraulic pressure at the hydraulic control unit; and verification that the average rate of FCV movement is within the specific limit ( $\leq 11\%/sec$ ).	SR 3.4.2.1, SR 3.4.2.2	4.4.1.1.a, 4.4.1.1.b	10
3.4.3, Jet Pumps				
L.1	Adds a Note to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation since these checks can only be performed when the loop is in operation.	SR 3.4.3.1 Note 1	N/A	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

L.2	Adds a Note that allows 24 hours to perform the jet pump surveillance after THERMAL POWER exceeds 25% RTP, since the data collected during performance of the surveillance < 25% RTP is not meaningful.	SR 3.4.3.1 Note 2	N/A	3
L.3	Deletes the requirement to assess operability of jet pumps that are not in operation, limiting testing to those jet pumps in the operating loop, when in single loop operation. The reverse direction and low flow rates through the jet pumps that are not in operation do not provide meaningful indication of the operability of the jet pumps that are not in operation.	SR 3.4.3.1	4.4.1.2.2	3
L.4	Modifies the surveillance acceptance criteria from 10% to 20% for individual jet pump diffuser-to-lower plenum differential pressure variations from the established pattern, consistent with the recommendations of SIL-330 and NUREG/CR-3052.	SR 3.4.3.1	4.4.1.2.1, 4.4.1.2.2	3
3.4.4, Safety/Relief Valves				
L.1	Deletes the requirement that all installed S/RVs be closed, since the requirement is essentially covered by other Technical Specifications.	N/A	LCO 3.4.2	1
L.2	Deletes the requirement to verify the low-low set function does not interfere with the OPERABILITY of the S/RVs by a CHANNEL CALIBRATION, since it is not necessary to ensure the OPERABILITY of the safety function of the S/RVs.	N/A	4.4.2.2	3
L.3	Not used.			
3.4.5, RCS Operational Leakage				
L.1	Extends the Surveillance Frequency for verifying the RCS operational leakage is within limits from "8 hours not to exceed 12 hours" to "12 hours."	SR 3.4.5.1	4.4.3.2.1	3
L.2	Deletes the MODES 2 and 3 Applicability requirement for the unidentified LEAKAGE rate increase limit, since as a plant starts up and increases pressure, leakage will occur due to the increased pressure.	LCO 3.4.5.d	3.4.3.2.e	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.6, RCS Pressure Isolation Valve Leakage				
L.1	Currently, PIV leakage limits of CTS 3.4.3.2 are required to be met in MODES 1, 2, and 3. A MODE 3 exception is included in the APPLICABILITY of ITS 3.4.6 for valves in the shutdown cooling flow path when needed for the shutdown cooling function.	3.4.6	3.4.3.2	2
L.2	Revises the requirement to isolate the high-pressure portion of the affected system from the low-pressure portion within 4 hours using at least two closed valves has been revised to require one valve to be closed within 4 hours and a second valve to be closed within 72 hours.	3.4.6 Required Actions A.1 and A.2	3.4.3.2 Action c	6
L.3	Deletes the explicit post maintenance PIV leak check Surveillance Requirement (i.e., each PIV shall be demonstrated OPERABLE by leak testing before returning the PIV to service following maintenance, repair, or replacement work on the PIV), as it is redundant to SR 3.0.1 and the definition of OPERABILITY.	N/A	4.4.3.2.2.a.2	3
L.4	Revises the limit on PIV leakage from 1 gpm per valve to specify leakage based on valve size with a maximum limit of 5 gpm per valve.	SR 3.4.6.1	LCO 3.4.3.2.d	1
3.4.7, RCS Leakage Detection Instrumentation				
LE.1	Relaxation of the Surveillance Frequency from 18 to 24 months for performing the Channel Calibrations of the RCS leakage detection instrumentation.	SR 3.4.7.3	4.4.3.1.a, 4.4.3.1.b, 4.4.3.1.c	10
L.1	CTS 3.4.3.1 requires the primary containment atmospheric particulate, sump flow, and either the air coolers condensate flow rate or atmospheric gaseous radioactivity monitoring systems to be OPERABLE. These required RCS leakage detection monitoring systems are rearranged in ITS 3.4.7 to require one method that can quantify the unidentified leakage and two diverse detection methods that provide indication of increased leakage. Associated Actions and Surveillance Requirements are revised accordingly.	LCO 3.4.7, 3.4.7 ACTIONS A, B, C, and D, SR 3.4.7.1, SR 3.4.7.2, SR 3.4.7.3	LCO 3.4.3.1.a and c, 3.4.3.1 Action, 4.4.3.1.a	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

L.2	Adds a Note that LCO 3.0.4 is not applicable for the condition of the primary containment sump flow rate monitoring system or the combination of an inoperable atmospheric monitoring system and primary containment air cooler condensate flow rate inoperable.	3.4.7 ACTIONS A and D Note	N/A	7
L.3	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other Leakage Detection System channel is OPERABLE.	3.4.7 Surveillance Requirements Note	N/A	6
3.4.8, RCS Specific Activity				
L.1	Deletes requirement to maintain specific activity $\leq 100/E\text{-bar } \mu\text{Ci/gm}$ .	N/A	LCO 3.4.5.b, 3.4.5 Actions a.2 and b, Table 4.4.5-1 Items 1 and 3, including footnote *	1
L.2	Changes the Applicability from Operational Conditions 1, 2, 3, and 4 to MODE 1 and Modes 2 and 3 with any main steam line not isolated (i.e., those conditions which represent a potential for release of significant quantities of radioactive coolant to the environment). Actions are modified to reflect the new Applicability, and an option for exiting the applicable MODES is provided for cases where isolation is not desired.	3.4.8 Applicability, 3.4.8 ACTION B	3.4.5 Applicability, 3.4.5 Actions a, a.1, and b, Table 4.4.5-1 Item 4	2
L.3	Adds a Note to indicate that LCO 3.0.4 is not applicable during the first 48 hours of failure to meet the LCO limit provided the specific activity is $\leq 4.0 \mu\text{Ci/gm DEI}$ .	3.4.8 ACTION A Note	N/A	7
3.4.9, RHR Shutdown Cooling System - Hot Shutdown				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

L.1	Revises requirements to allow a recirculation pump to be in operation in lieu of a shutdown cooling mode loop of the RHR System, consistent with the allowance in CTS 4.4.9.1 that an "alternate method" is acceptable.	LCO 3.4.9, 3.4.9 ACTION B, SR 3.4.9.1	LCO 3.4.9.1, 3.4.9.1 Action b, 4.4.9.1	1, 4
L.2	Adds Notes making LCO 3.0.4 and SR 3.0.4 not applicable to provide the necessary time to place the system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed in service until the suction valves high pressure closure interlock is cleared.	3.4.9 ACTION Note 1, SR 3.4.9.1 Note	N/A	7
L.3	CTS 3.4.9.1 footnote # allows one RHR shutdown cooling loop to be inoperable for 2 hours for surveillance testing, provided the other loop is Operable and in operation. CTS 3.4.9.1 footnote * allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is Operable. The requirements are changed to delete the "provided" requirements.	LCO 3.4.9 Notes 1 and 2	LCO 3.4.9.1 footnotes # and *	1
3.4.10, RHR Shutdown Cooling System - Cold Shutdown				
L.1	Revises requirements to allow a recirculation pump to be in operation in lieu of a shutdown cooling mode loop of the RHR System, consistent with the allowance in CTS 4.4.9.2 that an "alternate method" is acceptable.	LCO 3.4.10, 3.4.10 ACTION B, SR 3.4.10.1	LCO 3.4.9.2, 3.4.9.2 Action b, 4.4.9.2	1, 4
L.2	CTS 3.4.9.2 footnote # allows one RHR shutdown cooling loop to be inoperable for 2 hours for surveillance testing, provided the other loop is Operable and in operation. CTS 3.4.9.2 footnote ** allows the RHR shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is Operable. The requirements are changed to delete the "provided" requirements.	LCO 3.4.10 Notes 2 and 3	LCO 3.4.9.2 footnotes # and **	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.4 - REACTOR COOLANT SYSTEM

L.3	Revises the CTS footnote that allows the RHR shutdown cooling mode loop to be removed from operation during hydrostatic testing to also allow the system to be inoperable during hydrostatic testing, since the RHR Shutdown Cooling System is in fact inoperable during hydrostatic testing.	LCO 3.4.10 Note 1	LCO 3.4.9.2 footnote ##	1
3.4.11, RCS Pressure and Temperature Limits				
NONE	NONE	NONE	NONE	NONE
3.4.12, Reactor Steam Dome Pressure				
L.1	Slightly increases the reactor steam dome pressure limit to allow pressure to be equal to 1020 psig and still be within the limit, since the safety analysis described in the UFSAR (overpressure protection analysis) assumes the initial reactor steam dome pressure is 1020 psig, not less than 1020 psig.	LCO 3.4.12, SR 3.4.12.1	LCO 3.4.6.2, 4.4.6.2	1
Current Specification 3/4.4.8, Structural Integrity				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.5.1, ECCS-Operating				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification that each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; verification that each required ADS valve strokes when manually actuated.	SR 3.5.1.6, SR 3.5.1.7, SR 3.5.1.8	4.5.1.c.1, 4.5.1.d.2.a), 4.5.1.d.2.b)	10
L.1	Relaxation in pressure at which ADS is required to be OPERABLE, from 122 psig to 150 psig.	LCO 3.5.1, 3.5.1 ACTION G	LCO 3.5.1.a.3 and LCO 3.5.1.b.2, including footnote *, 3.5.1 Actions e.1 and e.2	2
L.2	Elimination of the requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv).	N/A	3.5.1 Action i	9
L.3	Addition of a Note to allow operation of one or more of the RHR subsystems in the shutdown cooling mode during MODE 3, if necessary, and clarifies that the subsystems may still be considered OPERABLE for the LPCI mode.	LCO 3.5.1	LCO 3.5.1	1
L.4	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirements that verify each ECCS subsystem and ADS actuates on a "simulated" automatic initiation signal.	SR 3.5.1.6, SR 3.5.1.7	4.5.1.c.1, 4.5.1.d.2.a)	3
L.5	Deletion of the ECCS discharge line keep fill and differential pressure instrumentation and the associated Actions for inoperable instrumentation and supporting Surveillances, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	3.5.1 Action f, 3.5.1 Action g, 4.5.1.a.2, 4.5.1.c.2	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.5 - ECCS AND RCIC SYSTEM

L.6	Relaxes the requirement such that HPCS cannot be inoperable when the RCIC System is inoperable and it is "required to be OPERABLE." Currently, HPCS cannot be inoperable when the RCIC System is inoperable, even if the RCIC System is not required to be OPERABLE.	3.5.1 ACTION B	3.5.1 Action c	4
3.5.2, ECCS-Shutdown				
L.1	Deletion of requirements to: 1) suspend CORE ALTERATIONS when both ECCS subsystems are inoperable; and 2) suspend CORE ALTERATIONS when the suppression chamber water level requirement is not within limit.	N/A	3.5.2 Action b, 3.5.3 Action b	4
L.2	Deletes the requirement to "lock" the reactor mode switch in shutdown when the suppression pool is not within the required limit. The position of the reactor mode switch is controlled by the MODES definition Table.	N/A	3.5.3 Action b	8
L.3	CTS 3.5.3, Action b requires the establishment of Secondary Containment Integrity within 8 hours if the suppression pool water level is not within limits in MODES 4 and 5. ITS 3.5.2 Required Action C.2 has been added delaying this current ACTION for 4 hours to provide time to restore the limit (i.e., by restoring the affected ECCS subsystem to OPERABLE status). This 4 hour time is consistent with CTS LCO 3.5.2, Action b, which provides 4 hours to restore an inoperable ECCS subsystem with both required ECCS subsystems are inoperable, prior to the requirement to establish Secondary Containment Integrity.	3.5.2 Required Action C.2	3.5.3 Action b	6
L.4	Addition of a Note to allow operation of one RHR subsystem in the shutdown cooling mode during MODE 3, if necessary, and clarifies that the subsystem may still be considered OPERABLE for the LPCI mode.	LCO 3.5.2	LCO 3.5.2	1
3.5.3, RCIC System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: RCIC system functional test and the RCIC low pressure flow test.	SR 3.5.3.4, SR 3.5.3.5	4.7.3.c.1, 4.7.3.c.2	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.5 - ECCS AND RCIC SYSTEM

L.1	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance Requirement that verifies the RCIC System actuates on a "simulated" automatic initiation signal.	SR 3.5.3.5	4.7.3.c.1	3
L.2	Deletion of the RCIC System discharge line keep fill instrumentation and the associated Actions for inoperable instrumentation and supporting Surveillances, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	3.7.3 Action a, 4.7.3.a.2, 4.7.3.c.3	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.1.1, Primary Containment				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months (routine test) and 9 months to 12 months (reduced frequency test) for performing the drywell-to-suppression chamber bypass leakage test.	SR 3.6.1.1.3	4.6.2.1.d	10
L.1	In the ITS presentation, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. The CTS only restricts heating up reactor coolant above 200°F (i.e., entry into MODE 3). With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment is inoperable.	3.6.1.1 ACTION A	3.6.2.1 Action e	6
L.2 Open BSI	Deletes the CTS requirement to verify drywell-to-suppression chamber bypass leakage is within limits on an accelerated test basis and at a higher test pressure in the event that the results of consecutive drywell-to-suppression chamber bypass leakage tests are outside Technical Specification specified limits.	N/A	4.6.2.1.d.2	3
L.3	Not used.			
L.4	Not used.			
L.5	Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rate test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specification.	N/A	4.6.2.1.d	9

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

3.6.1.2, Primary Containment Air Lock				
L.1	Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases.	3.6.1.2 ACTIONS Note 1	3.6.1.3 Actions	4
L.2	Adds ITS Required Action Note to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for a limited period of time (i.e., 7 days). The allowance is proposed to have strict administrative controls, which are detailed in the Bases.	3.6.1.2 Required Action A Note 2	3.6.1.3 Action a	4
L.3	Not used.			
L.4	Adds ITS Required Action Note to allow administrative means to be used to verify a locked closed OPERABLE air lock door in high radiation areas or areas with limited access due to inerting.	3.6.1.2 Required Action A.3 Note	3.6.1.3 Action a	4
L.5	Currently, if the interlock mechanism is inoperable, a CTS action requires it to be restored in 24 hours or a shutdown is required. An ITS ACTION is added to specifically address the inoperable air lock interlock mechanism. Provided one inoperable air lock door in the air lock can be maintained closed, the assumptions of the accident analysis are maintained and operation should be allowed to continue. This closed OPERABLE door is also required to be locked to assure it remains closed. In the event containment access is desired, it is proposed containment access be allowed under strict administrative control. To provide a level of assurance equivalent to the mechanical interlock that at least one operable door will remain closed at all times during entry and exit, the proposed change requires an individual dedicated to assure that two doors are not open simultaneously and one door is re-locked prior to leaving. In addition, due to this new ACTION, the CTS action has been modified to also not be applicable if the air lock is inoperable as a result of an inoperable interlock mechanism.	3.6.1.2 ACTION B	3.6.1.3 Action b	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

L.6	Change the Frequency for the air lock interlock test from once per 6 months only upon entry into the primary containment air lock when primary containment is de-inerted, to 24 months.	SR 3.6.1.2.2	4.6.1.3.b and footnote **	3
3.6.1.3, Primary Containment Isolation Valves				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the automatic PCIV actuation test, EFCV actuation test, and TIP squib valve initiation test.	SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9	4.6.3.2, 4.6.3.3, 4.6.3.5.b	10
L.1	CTS 3.6.3 Action a requires an inoperable PCIV to be restored or the affected penetration isolated in 4 hours. CTS 3.4.7 Action 1 also requires an inoperable MSIV (which is a PCIV) to be restored or the affected penetration isolated in 8 hours. CTS 3.6.1.8 Action requires an open (i.e., inoperable) purge valve to be closed within 1 hour. The ITS allows 4 hours to isolate the affected penetration when a purge valve is inoperable, 8 hours to isolate the affected penetration when an MSIV is inoperable, and 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose system piping communicates with the suppression pool and is expected to remain submerged during the accident (i.e., a closed system as defined in the UFSAR), and only one PCIV.	3.6.1.3 Required Actions A.1 and C.1	3.6.3 Action a, 3.4.7 Action 1, 3.6.1.8 Action	6
L.2	The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices.	3.6.1.3 ACTIONS A, B, and C	3.6.3 Action a, 3.4.7 Action 1, 4.6.1.1.a	4
L.3	In the event two or more valves in a penetration are inoperable, CTS 3.6.3 Action a and CTS 3.4.7 Action 1, which require maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable.	3.6.1.3 ACTION B	3.6.3 Action a, 3.4.7 Action 1	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

L.4	Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument.	3.6.1.3 Required Action C.1	3.6.3 Action b.1	6
L.5	Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.6.3 footnote ** and Action footnote *.	3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2 and SR 3.6.1.3.3 Note 2	3.6.3 footnote **, 3.6.3 Action footnote *	1, 4
L.6	Deletes CTS 4.6.3.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.6.3.1	3
L.7	Not used.			
L.8	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each PCIV actuates on an automatic isolation "test" signal.	SR 3.6.1.3.7	4.6.3.2	3
L.9	Deletes the requirement that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated instrument line break signal.	SR 3.6.1.3.9	4.6.3.4	3
L.10	Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means. In addition, adds a Note to allow verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means.	3.6.1.3 Note 1 to Required Actions A.2 and C.2, SR 3.6.1.3.2, SR 3.6.1.3.3, 3.6.1.3 Note 2 to Required Actions A.2 and C.2	4.6.1.1.a	3, 4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

L.11	The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	SR 3.6.1.3.2, SR 3.6.1.3.3	4.6.1.1.a, including footnote **	3
L.12	The CTS limits the reason (inerting, deinerting, and pressure control) and the time (90 hours per 365 days) the 8 inch and 26 inch purge valves can be open for purging operations through the Standby Gas Treatment System, and also requires a verification that the time limit has not been exceeded prior to opening the valves. The ITS does not include the time limitations, and replaces them with specific criteria for opening.	SR 3.6.1.3.1 Note	3.6.1.8, 4.6.1.8.1	1, 3
L.13	When MSIV leakage rate or hydrostatically tested line leakage rate is not within the limit, one or more PCIVs would be considered inoperable. In this condition, CTS 3.6.3 Action a would require restoration of the inoperable PCIV or isolation of the penetration within 4 hours provided there is at least one Operable PCIV in the affected penetration. Otherwise, CTS 3.6.3 Action a would require the unit to be in Hot Shutdown within the next 12 hours and in Cold Shutdown in the following 24 hours. The times to restore leakage have been modified in the ITS to be 4 hours for hydrostatically tested line leakage not on a closed system, 8 hours for MSIV leakage), and 72 hours for valves in hydrostatically tested lines on a closed system.	3.6.1.3 ACTION D	3.6.3 Action a	6
3.6.1.4, Drywell and Suppression Chamber Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is $\leq$ 0.5 psid.	SR 3.6.1.6.3	4.6.4.1.b.2	10
L.1	Relaxation of the Surveillance Frequency from 31 days to 92 days for cycling the vacuum breakers.	SR 3.6.1.6.2	4.6.4.1.b.1	3
3.6.2.1, Suppression Pool Average Temperature				
L.1	Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one residual heat removal loop in the suppression pool cooling mode).	N/A	3.6.2.1 Action b.1	4
L.2	When the suppression pool temperature is $> 105^{\circ}\text{F}$ but $\leq 110^{\circ}\text{F}$ , the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is $> 105^{\circ}\text{F}$ and $\leq 110^{\circ}\text{F}$ , and power is $> 1\%$ RTP, ITS requires verification of suppression pool temperature once per hour in this condition. If $< 1\%$ RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient.	3.6.2.1 Required Action A.2, SR 3.6.2.1.1	4.6.2.1.b.3, 4.6.2.1.b.2	3, 6
3.6.2.2, Suppression Pool Water Level				
L.1	Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits.	3.6.2.2 Required Action A.1	3.6.2.1 Action a, 3.5.3 Action a	6
3.6.2.3, RHR Suppression Pool Cooling				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

L.1	Extends from 72 hours to 7 days the restoration time when one subsystem is inoperable. In addition, a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable has been provided. Currently, no time is provided; CTS 3.6.2.3 Action b requires a unit shutdown.	3.6.2.3 ACTIONS A and B	3.6.2.3 Actions a and b	6
3.6.2.4, RHR Suppression Pool Spray				
NONE	NONE	NONE	NONE	NONE
3.6.3.1, Primary Containment Hydrogen Recombiners				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the system functional test for each hydrogen recombiner and for performing a resistance to ground test for each heater phase.	SR 3.6.3.1.1, SR 3.6.3.1.2	4.6.6.1.b, 4.6.6.1.c.2	10
L.1	Adds a statement that LCO 3.0.4 is not applicable for the condition of one hydrogen recombiner inoperable.	3.6.3.1 ACTION A Note	3.6.6.1 Actions	7
L.2	Adds an ACTION for the condition of both containment hydrogen recombiners inoperable, with a 7 day Completion Time to restore at least one of the recombiners to OPERABLE status before requiring a shutdown, provided the hydrogen control function is maintained. CTS provides no actions for this condition, requiring a 3.0.3 entry.	3.6.3.1 ACTION B	3.0.3	4, 6
L.3	Not used.			
L.4	Deletes the CHANNEL CALIBRATION surveillance for the hydrogen recombiner instrumentation and control circuits.	N/A	4.6.6.1.c.1	3
3.6.3.2, Primary Containment Oxygen Concentration				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing CTS 4.6.5.1.c.1 and 4.6.5.1.c.2, which ensure that the Secondary Containment is OPERABLE to support the drawdown analysis.	SR 3.6.4.1.3, SR 3.6.4.1.4	4.6.5.1.c.1, 4.6.5.1.c.2	10
3.6.4.2, Secondary Containment Isolation Valves				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal.	SR 3.6.4.2.3	4.6.5.2.b	10
L.1	Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves under, as is allowed in the existing primary containment Technical Specifications (CTS 3.6.3) and in ITS 3.6.1.3.	3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2	3.6.5.2 Actions	1
L.2	In the event both dampers in a penetration are inoperable in an open penetration, the CTS 3.6.5.2 Action, which requires maintaining one isolation damper OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable.	3.6.4.2 ACTION B	3.6.5.2 Action	6
L.3	Deletes CTS 4.6.5.2.a, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.6.5.2.a	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.6 - CONTAINMENT SYSTEMS

L.4	The requirement to perform CTS 4.6.5.2.b during COLD SHUTDOWN or REFUELING has been deleted, since the control of the plant conditions appropriate to perform the test is an issue for procedures and scheduling, and has been determined by the NRC Staff to be unnecessary as a Technical Specification restriction as indicated in Generic Letter 91-04.	N/A	4.6.5.2.b	3
L.5	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance Requirement that verifies each SCIV actuates on an automatic isolation "test" signal.	SR 3.6.4.2.3	4.6.5.2.b	3
L.6	Adds Notes to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative controls.	3.6.4.2 Required Action A.2 Note 1, SR 3.6.4.2.1 Note 1	4.6.5.1.b.2	3, 4
L.7	The requirements related to verification of the position of secondary containment isolation penetrations not capable of being closed by OPERABLE secondary containment isolation valves (SCIVs), are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	3.6.4.2 Required Action A.2 Note 2, SR 3.6.4.2.1	4.6.5.1.b.2	3, 4
3.6.4.3, Standby Gas Treatment System				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each SGT subsystem actuates on an actual or simulated automatic initiation signal.	SR 3.6.4.3.3	4.6.5.3.d.2	10
L.1	The CTS requires suspending operations if an SGT subsystem cannot be returned to OPERABLE status within 7 days, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. As an alternative, the ITS will allow the OPERABLE SGT subsystem to be placed in operation and continue to conduct operations (e.g., OPDRVs).	3.6.4.3 Required Action C.1	3.6.5.3 Action a.2	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.7 - PLANT SYSTEMS

L.2	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies each subsystem actuates on an automatic initiation "test" signal.	SR 3.6.4.3.3	4.6.5.3.d.2	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.7.1, Residual Heat Removal Service Water System				
L.1	Extends the time to restore the inoperable RHRSW subsystem from 72 hours to 7 days.	3.7.1 ACTION A	3.7.1.1 Action a.1	6
L.2	A restoration time (8 hours) when both RHRSW subsystems are inoperable is provided. Currently, no time is provided; CTS requires a unit shutdown.	3.7.1 ACTION B	3.7.1.1 Action a.2	6
3.7.2, Diesel Generator Cooling Water System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the DGCW automatic start Surveillance.	SR 3.7.2.2	4.7.1.2.b	10
L.1	Adds the phrase "actual or simulated," in reference to the automatic initiation signal, to the Surveillance Requirements that verify each DGCW subsystem actuates on a "start" signal.	SR 3.7.2.2	4.7.1.2.b.1, 4.7.1.2.b.2	3
3.7.3, Ultimate Heat Sink				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the determination of sediment deposition and the pond bottom elevation.	SR 3.7.3.2, SR 3.7.3.3	4.7.1.3	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.7 - PLANT SYSTEMS

3.7.4, Control Room Area Filtration System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CRAF System automatic initiation and operation Surveillance.	SR 3.7.4.4, SR 3.7.4.5	4.7.2.d.2	10
L.1	Revises the MODES 4 and 5 portion of the Applicability to be only during CORE ALTERATIONS or during OPDRVs.	3.7.4	3.7.2	2
L.2	Deletes the CRAF System staggered testing requirements for the 31 day operation test.	SR 3.7.4.1, SR 3.7.4.2	4.7.2.a	3
L.3	Adds the phrase "actual or," in reference to the actuation test signal that verifies that each CRAF subsystem actuates on an actuation test signal.	SR 3.7.4.4	4.7.2.d.2	3
3.7.5, Control Room Area Ventilation Air Conditioning System				
NONE	NONE	NONE	NONE	NONE
3.7.6, Main Condenser Offgas				
L.1	Changes the Applicability from "MODES 1, 2, and 3" to "MODE 1" and "MODES 2 and 3 with any main steam line not isolated and steam jet air ejector (SJAE) in operation." Also adds new Required Action to isolate the air ejector, when the release rate is not restored to within limits in 72 hours.	LCO 3.7.6, 3.7.6 Required Action B.2	LCO 3.11.2.2	2
L.2	Extends the time allowed to close the main steam isolation valves from 6 hours to 12 hours.	3.7.6 ACTION B	3.11.2.2 Action	5
L.3	Adds new Required Actions that require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours, which exits the new Applicability of the LCO.	3.7.6 Required Actions B.3.1 and B.3.2	N/A	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.7 - PLANT SYSTEMS

L.4	Adds a Note that allows the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation, since this determination is only meaningful with one or more main steam lines not isolated and the SJAE in operation.	SR 3.7.6.1 Note	N/A	3
3.7.7, Main Turbine Bypass System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for performing the system functional test and the TURBINE BYPASS SYSTEM RESPONSE TIME test.	SR 3.7.7.2, SR 3.7.7.3	4.7.10.b.1, 4.7.10.b.2	10
L.1	Deletes the requirement to shutdown the unit with less than four main turbine bypass valves capable of accepting steam flow and the MCPR LCO adjusted, since with the MCPR LCO adjusted, the analysis assumptions are met.	N/A	3.7.10 Action 2.b)	5
3.7.8, Spent Fuel Storage Pool Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.7.4, Sealed Source Contamination				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.7.7, Area Temperature Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.7 - PLANT SYSTEMS

NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.7.9, Snubbers				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.8.1, AC Sources - Operating				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following AC sources related Surveillance Requirements: offsite circuit transfer test; single load reject test; full load reject test; LOOP test; LOCA test; automatic trip bypass test; 24 hour run test; hot restart test; DG synchronization shutdown test; test mode override test; load block interval test; and LOCA/LOOP test.	SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.19, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18	4.8.1.1.1.b, 4.8.1.2.d.2, 4.8.1.2.d.3, 4.8.1.2.d.4, 4.8.1.2.d.5, 4.8.1.2.d.6, 4.8.1.2.d.7, 4.8.1.2.d.8, 4.7.1.2.d.10, 4.8.1.2.d.11, 4.8.1.2.d.12	10
L.1	In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "10 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3, B.4, and C.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss.	3.8.1 Required Actions A.3, B.4, and C.4	3.8.1.1 Actions c, e, and f	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

L.2	The CTS requires a DG start test for the remaining DGs to be performed within 48 hours prior to performing pre-planned maintenance or testing on the common DG. However, under normal conditions when a DG is inoperable, the CTS does not require this test if a DG is inoperable due to pre-planned maintenance or testing. The ITS will not include this extra requirement when the common DG is placed in an inoperable status for pre-planned maintenance or testing. In addition, the CTS requirement that precludes maintenance on offsite circuits or diesel generators while the common DG is inoperable is also deleted, since the ACTIONS of ITS 3.8.1 are adequate to ensure appropriate compensatory measures are taken in the event another required AC electrical power source is inoperable.	N/A	LCO 3.8.1.1.b footnote * Parts B and C	4
L.3	Deletes the requirement to verify the cause of the inoperable DG does not impact the other DG.	N/A	3.8.1.1 Actions b, c, d, f, and g footnote *	4
L.4	CTS 3.8.1.1 Actions c and f require a verification by evaluation or test within 8 hours that the cause of a DG inoperability does not affect the remaining DGs. ITS 3.8.1 Required Actions C.3.1 and C.3.2 will continue to require this verification, but will allow 24 hours to perform the verification.	3.8.1 Required Actions C.3.1 and C.3.2	3.8.1.1 Actions c and f	6
L.5	CTS 3.8.1.1 Actions do not address both Division 2 DGs inoperable, therefore, the plant would default to CTS 3.0.3. ITS LCO 3.8.1 ACTION F will allow the unit Division 2 DG and required opposite unit DG to be inoperable for 2 hours before entry into ITS LCO 3.8.1, ACTION G (MODE 3 within 12 hours and MODE 4 within 36 hours) is required.	3.8.1 ACTIONS F and G	3.0.3	6
L.6	Not used.			
L.7	Deletes STAGGERED TEST BASIS requirement from the CTS 4.8.1.1.2.a normal monthly DG Surveillances.	N/A	4.8.1.1.2.a	3
L.8	The Surveillance Frequency for CTS 4.8.1.1.2.a.3, the fuel oil transfer pump test, has been changed from "31 days" to "92 days."	SR 3.8.1.6	4.8.1.1.2.a.3	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

L.9	For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained. In addition, the upper limit on the frequency will be 61.2 Hz, which is equivalent to a speed of 900 rpm +2%. Thus, for steady state conditions, the proposed SRs will be more restrictive.	SR 3.8.1.7, SR 3.8.1.12, SR 3.8.1.20	4.8.1.1.2.a.4, 4.8.1.1.2.d.5, 4.8.1.1.2.e	3
L.10	The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification Operability requirements and is removed from the Technical Specifications.	LCO 3.8.1	4.8.1.1.2.a.6	3
L.11	CTS 4.8.1.1.2.b requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each operation of the diesel where the period of operation was greater than or equal to 1 hour." ITS SR 3.8.1.5 only requires the check every 31 days.	SR 3.8.1.5	4.8.1.1.2.b	3
L.12	The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, 4.8.1.1.2.d.6, 4.8.1.1.2.d.7, and 4.8.1.1.2.d.11 for verifying the proper response of the DG. This allows satisfactory loss of offsite power or ECCS actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. OPERABILITY is adequately demonstrated in either case since the DG cannot discriminate between "actual" or "simulated" signals.	SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.19, SR 3.8.1.13, SR 3.8.1.17	4.8.1.1.2.d.4, 4.8.1.1.2.d.5, 4.8.1.1.2.d.6, 4.8.1.1.2.d.7, 4.8.1.1.2.d.11	3
L.13	The manner in which the DG is started for CTS 4.8.1.1.2.d.8 (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS.	N/A	4.8.1.1.2.d.8	3
L.14	Deletes CTS 4.8.1.1.2.d.13, which verifies the DG lockout features prevent DG operation only when required.	N/A	4.8.1.1.2.d.13	3
L.15	Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.8.1.1.2.e (i.e., after any modifications which could affect DG interdependence).	N/A	4.8.1.1.2.e	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.16	The requirement to conduct CTS 4.8.1.1.2.e (to simultaneously start all three DGs) when the reactor is shutdown has not been included in the ITS.	N/A	4.8.1.1.2.e	3
L.17	CTS 3.0.5 provides an allowance that required feature(s) supported by an inoperable AC source may be considered OPERABLE provided the redundant required feature(s) are OPERABLE. However, if these requirements are not satisfied, CTS 3.0.5 requires the unit to be placed in Startup within 6 hours, Hot Shutdown within following 6 hours, and in Cold Shutdown within the subsequent 24 hours. In lieu of a shutdown, ITS LCO 3.8.1 ACTIONS A, B, C, and D include requirements to declare required feature(s) supported by the inoperable AC source inoperable when the redundant required feature(s) are inoperable. ITS 3.8.1 ACTION A (one required offsite circuit inoperable) allows 24 hours before declaring the equipment supported by the inoperable AC source inoperable, ITS 3.8.1 ACTIONS B and C (one required DG inoperable) allow 4 hours before the affected supported equipment must be declared inoperable, and ITS 3.8.1 ACTION D (two required offsite circuits inoperable) allows 12 hours before the affected supported equipment must be declared inoperable. By declaring the affected supported equipment inoperable, and as a result, taking the Technical Specifications actions of the affected supported equipment, unit operation is maintained within the bounds of the Technical Specifications and approved ACTIONS.	3.8.1 ACTIONS A, B, C, and D	3.0.5	6
L.18	Not used.			
L.19	If an offsite circuit is inoperable only due to its inability to provide power to the Division 3 electrical power distribution subsystem, CTS 3.8.1.1 Action a would require a unit shutdown if the offsite circuit is not restored to OPERABLE status within 72 hours. ITS 3.8.1 provides an Applicability Note which, in the event the HPCS System is inoperable, allows the associated offsite circuit to not be required to be OPERABLE. Thus, at the end of the current 72 hour restoration time, the ITS Note would allow the HPCS System to be declared inoperable, and the ACTIONS in ITS 3.5.1 would be taken for an inoperable HPCS System. The ACTIONS of ITS 3.5.1 allow 14 days to restore the HPCS System to OPERABLE status. The overall effect of this change is to allow an additional 14 days to restore the circuit to OPERABLE status, since this is the only way to restore the HPCS System to OPERABLE status under this condition.	3.8.1 Applicability Note 1	N/A	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.20	The CTS requires verification that the interval between each load block is within $\pm 10\%$ of its design interval for Division 1 and 2 Dgs. The SR is proposed to be changed to delete the upper 10% limit, such that the interval between each load block is only required to be $\geq 90\%$ of the design load interval.	4.8.1.1.12.d.2	SR 3.8.1.18	3
3.8.2, AC Sources - Shutdown				
L.1	In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO.	SR 3.8.2.1 Note 1	4.8.1.2	3
L.2	CTS 4.8.1.2, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.8.1.1.2 to be performed. Two of the Surveillances of CTS 4.8.1.1.2 are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable.	SR 3.8.2.1 Note 2	4.8.1.2	3
L.3	An alternative is proposed in the ITS to suspend operations if an AC Source is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow.	3.8.1.2 Action a	3.8.2 Required Action A.1	5
3.8.3, Diesel Fuel Oil and Starting Air				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.1	The diesel fuel oil and starting air parameters, while supporting DG OPERABILITY, contain substantial margin in addition to the limits which would be absolutely necessary for DG OPERABILITY. Therefore, certain levels of degradation in these parameters are justified to extend the allowances for restoration (presented as ITS 3.8.3 ACTIONS A, B, C, D, E and ACTIONS Note). During the extended restoration periods for these parameters, the DG would still be capable of performing its intended function. ACTION A allows 48 hours to restore fuel oil level in the storage tanks prior to declaring the DG inoperable, provided fuel oil level is sufficient for 6 days supply. ACTION B allows 7 days to restore stored fuel oil total particulates to within limits prior to declaring the DG inoperable. ACTION C allows 30 days to restore other stored fuel oil properties to within limits. ACTION D allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION E is provided to declare the DG inoperable if previous ACTIONS are not met. During the proposed extended periods for restoration of these parameters, the DG would still be capable of performing its intended function.	3.8.3 ACTIONS Note, 3.8.3 ACTIONS A, B, C, D, and E	3.8.1.1 Actions, 3.8.1.2 Actions	6
L.2	Deletes STAGGERED TEST BASIS requirement from the CTS 4.8.1.1.2.a normal monthly fuel oil storage tank level and the starting air pressure Surveillances.	N/A	4.8.1.1.2.a	3
3.8.4, DC Sources - Operating				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following Surveillances: Visual inspection of battery for physical damage or abnormal deterioration; verification that cell-to-cell and terminal connections are free of corrosion; inter-cell and terminal connection resistance checks; battery charger test; and battery service test.	SR 3.8.4.3, SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7	4.8.2.3.2.c, 4.8.2.3.2.d	10
L.1	Removes from CTS 4.8.2.3.2.b the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is < 150 X10 <sup>-6</sup> ohm.	N/A	4.8.2.3.2.b	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.2	CTS 4.8.2.3.2.c.2 and 4.7.3.d.3.b) require the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of ITS SR 3.8.4.5, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries.	SR 3.8.4.5	4.8.2.3.2.c.2, 4.7.3.d.3.b)	3
L.3	Not used.			
L.4	CTS 4.8.2.3.2.e allows a performance discharge test to substitute for the service test once every 60 months, whereas ITS SR 3.8.4.7 Note 1 will only allow a modified performance discharge test to be substituted for the service test. In addition, the modified performance discharge test will be allowed to substitute for the service test at any time, instead of just one every 60 months.	SR 3.8.4.7 Note 1	4.8.2.3.2.e	3
L.5	Adds an allowance to perform a modified performance discharge test in lieu of a performance discharge test.	SR 3.8.4.8	4.8.2.3.2.e, 4.8.2.3.2.f	3
L.6	CTS 4.8.2.3.2.f requires an annual battery performance discharge test when the battery has reached 85% of its service life. A battery can be at 85% or greater of expected life, and still be within the required capacity to meet OPERABILITY requirements. In this event, a Frequency less restrictive than the annual Frequency is justified. ITS SR 3.8.4.8 will now be required to be performed every 24 months when a battery has reached 85% of expected life with battery capacity $\geq$ 100% of manufacturer's rating to be consistent with NUREG-1434, Rev. 1.	SR 3.8.4.8	4.8.2.3.2.f	3
L.7	Reduces the test duration from 8 hours to 4 hours for the performance of a battery charger capacity test to verify the charger will supply a load equal to the manufacturer's rating.	SR 3.8.4.6	4.8.2.3.2.c.4	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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3.8.5, DC Sources - Shutdown				
L.1	Three of the DC sources Surveillances required to be performed by CTS 4.8.2.4 (CTS 4.8.2.3.2.d, 4.8.2.3.2.e, and 4.8.2.3.2.f) involve tests that would cause the only required OPERABLE unit 125V battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, ITS SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE unit 125V battery(s) to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO.	SR 3.8.5.1 Note	N/A	3
L.2	This time allowed to re-energize the associated 125V DC electrical power distribution subsystem using the OPERABLE opposite unit DC electrical power subsystem has been extended from immediately to 1 hour.	3.8.5 Required Action A.1	3.8.2.4 Action c	6
L.3	An alternative is proposed in the ITS to suspend operations if an AC Source is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow.	3.8.2.4 Action a	3.8.5 Required Action B.1	5
3.8.6, Battery Cell Parameters				
L.1	Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 60°F within 7 days after a battery discharge or overcharge.	N/A	4.8.2.3.2.b	3
L.2	Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge.	Table 3.8.6-1 footnote (a)	Table 4.8.2.3.2- 1	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
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L.3	Applies to all Category limits the allowance in CTS Table for utilizing charging current in lieu of specific gravity, whereas currently, this allowance is not provided for Category B limits or part of the Category B allowable values. In addition, the allowance is also applied to the specific gravity requirements for the 250 VDC battery.	Table 3.8.6-1 footnote (c)	Table 4.8.2.3.2-1 footnote (b)	1
L.4	The time specified in CTS Table 4.8.2.3.2-1 footnotes (1) and (2) to restore Category A and B battery cell parameters to within limits has been extended from the next 7 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days.	3.8.6 Required Actions A.2 and A.3	Table 4.8.2.3.2-1 footnotes (1) and (2)	6
L.5	Currently, if a 250 VDC battery cell is not within the limits, the RCIC System is required to be declared inoperable and the ACTIONS of CTS 3.7.3 taken. A 31 day Completion Time for restoring a 250 VDC battery cell has been provided (ITS 3.8.6 Required Action A.3). To support this new time, two additional requirements have been added. ITS 3.8.6 Required Action A.1 has been provided to verify the 250 VDC battery pilot cell electrolyte level and float voltage are within allowable values (Category C limits) within 1 hour when Category A or B parameters are not within limits. ITS 3.8.6 Required Action A.2 has been provided to verify 250 VDC battery cell parameters for all the cells are within Category C limits within 24 hours when Category A or B parameters are not within limits. If Category C limits are not met or the Category A and B limits are not restored within 31 days, ITS 3.8.6 ACTION B requires the 250 VDC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 be taken.	3.8.6 ACTION A	3.7.3 Action b	6
L.6	The current total voltage limit for the 250 VDC battery (greater than or equal to 250V under float charge) has been changed to an individual cell voltage limit (Category A and B limit is 2.13 V per cell and the new Category C limit is 2.07 V per cell). In addition, CTS 4.7.3.d.2.a) requires that the voltage decrease from the value observed during the original test not exceed 12 volts and CTS 4.7.3.d.2.b) requires that the specific gravity decrease from the value observed during the previous test not exceed 0.05. These requirements are not maintained in the ITS.	Table 3.8.6-1 Category A, B, and C limits	4.7.3.d.2.a), 4.7.3.d.2.b)	1, 3

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L.7	The 125 VDC battery cell electrolyte temperature limit has been slightly increased to allow electrolyte temperature to be greater than or equal to 60°F, in lieu of the current requirement that the temperature be greater than 60°F.	SR 3.8.6.3	4.8.2.3.2.b.3	1
3.8.7, Distribution Systems - Operating				
L.1	CTS 3.8.2.1 Action a allows 8 hours to restore one inoperable AC subsystem and CTS 3.8.2.3 Action a allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.3. ITS 3.8.7 ACTIONS A and B allow one "or more" AC and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.7 ACTION G is also added to require that if two or more electrical power distribution subsystems are inoperable that, in combination result in a loss of function, then ITS 3.0.3 must be entered immediately.	3.8.7 ACTIONS A and B	3.8.2.1 Action a, 3.8.2.3 Action a	6
L.2	CTS 3.8.2.1.d requires the opposite unit Division 1 4.16 kV bus and cross-tie breaker be OPERABLE. The opposite unit's Division 1 4.16 kV bus does not provide power to any opposite unit equipment required by the given unit; only the opposite unit's Division 2 AC buses provide power to equipment required by the given unit. The purpose of CTS 3.8.2.1.d is to support the alternate offsite circuit pathway to the given unit. As such, this requirement has been moved to ITS 3.8.1 (See DOC A.2 for ITS 3.8.7). CTS 3.8.2.1 Action d requires that if both the opposite unit's Division 1 and 2 buses are inoperable, one of them must be restored within 8 hours or a shutdown is required. This requirement is overly restrictive and has not been included in the ITS.	N/A	3.8.2.1 Action d	4
3.8.8, Distribution Systems - Shutdown				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

L.1	An alternative is proposed in the ITS to suspend operations if an AC Source is inoperable and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare the affected feature(s) inoperable and continue to conduct operations (e.g., OPDRVs), if the affected feature(s) ACTIONS allow.	3.8.2.2 Action a, 3.8.2.4 Action a	3.8.8 Required Action A.1	5
Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.1, Refueling Equipment Interlocks				
L.1	Adds actions to allow a control rod block to be inserted and to verify all control rods inserted are fully inserted in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable.	3.9.1 Required Actions A.2.1 and A.2.2	N/A	4
L.2	Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency of CTS 4.9.1.2 (proposed SR 3.9.1.1) for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY.	N/A	4.9.1.2	3
L.3	Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.1.3	3
3.9.2, Refuel Position One-Rod-Out Interlock				
L.1	Deletes the requirement to "lock" the mode switch in Shutdown.	N/A	LCO 3.9.1, 3.9.1 Action a, 4.9.1.1	8
L.2	Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS requires CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel.	3.9.2 Required Actions A.1 and A.2	3.9.1 Actions a and b	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.9.1.1 "within 2 hours before" and CTS 4.9.1.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY.	N/A	4.9.1.1, 4.9.1.2	3
L.4	Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance.	SR 3.9.2.2 Note	N/A	7
L.5	Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.1.3	3
3.9.3, Control Rod Position				
L.1	Revises the Applicability that all control rods be inserted (clarified to require "fully" inserted) in OPERATIONAL CONDITION 5 during CORE ALTERATIONS to "when loading fuel assemblies into the core," since the intent is to establish the requirement that all control rods are inserted only in those situations that could add positive reactivity but are not covered by other Technical Specifications. In addition, the Actions have been revised consistent with the change in Applicability.	3.9.3, 3.9.3 ACTION A	3.9.3, 3.9.3 Action	2, 4
L.2	Deletes the requirement to perform CTS 4.9.3 "within 2 hours prior to the start of CORE ALTERATIONS," since the normal 12 hour periodic Surveillance Frequency to verify the control rods are inserted provides adequate assurance of OPERABILITY.	N/A	4.9.3.a, 4.9.3.a.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.4, Control Rod Position Indication				
L.1	Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is proposed to be required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, that the full-out indicator functions during rod coupling checks, and the full-in position indication checks prior to each reactor startup and each time a control rod is fully inserted, have been deleted.	LCO 3.9.4, SR 3.9.4.1	LCO 3.1.3.7, 3.1.3.7 Action b, 4.1.3.7.a, 4.1.3.7.b, 4.1.3.7.c, 4.1.3.7.d	1, 3
3.9.5, Control Rod OPERABILITY - Refueling				
NONE	NONE	NONE	NONE	NONE
3.9.6, RPV Water Level - Irradiated Fuel				
L.1	Deletes the requirement to perform CTS 4.9.8 "within 2 hours prior to the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.9.8	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.7, RPV Water Level - New Fuel or Control Rods				
L.1	Splits CTS 3.9.8, which provides reactor vessel water level requirements during movement of fuel assemblies and handling of control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange as is in CTS 3.9.8.	LCO 3.9.7	LCO 3.9.8	1
L.2	Deletes the requirement to perform CTS 4.9.8 "within 2 hours prior to the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.9.8	3
3.9.8, Residual Heat Removal - High Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.9.4, Decay Time				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.9.5, Communications				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.9.6, Crane and Hoist				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.9.7, Crane Travel				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.10.1, Reactor Mode Switch Interlock Testing				
L.1	ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted. An additional change is proposed to include Refuel as an allowable reactor mode switch position for these interlock tests in Hot Shutdown and Cold Shutdown conditions.	LCO 3.10.1	Table 1.2 footnote #, 3.9.1 footnote ##	1
3.10.2, Single Control Rod Withdrawal - Hot Shutdown				
NONE	NONE	NONE	NONE	NONE
3.10.3, Single Control Rod Withdrawal - Cold Shutdown				
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	LCO 3.9.10.1.a, 4.9.10.1.a	1, 8
L.2	For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in ITS 3.10.3 in place of the SHUTDOWN MARGIN and control rod five-by-five array of disarming requirements of. The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring, and LCO 3.9.5, Control Rod OPERABILITY — Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement.	LCO 3.10.3.b.2, LCO 3.10.3.c.1, SR 3.10.3.1, SR 3.10.3.4	N/A	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.1	3
3.10.4, Single Control Rod Drive Removal - Refueling				
L.1	Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	LCO 3.9.10.1.a, 4.9.10.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.9.10.1 "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.1	3
3.10.5, Multiple Control Rod Withdrawal - Refueling				
L.1	The requirement "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE	N/A	LCO 3.9.10.2.a, 4.9.10.2.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.9.10.2.1 "Within 4 hours prior to the start of removal of control rods and/or control rod drive mechanisms from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.9.10.2.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.9.10.2, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.9.10.2.2	3
3.10.6, Control Rod Testing - Operating				
NONE	NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling				
L.1	Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test	SR 3.10.7.2, SR 3.10.7.3, SR 3.10.7.4	4.10.3	3
Current Specification 3/4.10.1, Primary Containment Integrity				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.5, Oxygen Concentration				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
SECTION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.10.6, Training Startups				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only)				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
5.1, Responsibility				
NONE	NONE	NONE	NONE	NONE
5.2, Organization				
NONE	NONE	NONE	NONE	NONE
5.3, Unit Staff Qualifications				
NONE	NONE	NONE	NONE	NONE
5.4, Procedures				
NONE	NONE	NONE	NONE	NONE
5.5, Programs and Manuals				
LD.1	Extends the Frequency from 18 to 24 months for the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident.	5.5.2.b	6.2.F.1.b	10
LD.2	Extends the Frequency from 18 to 24 months for the Surveillances on the SGT System in place charcoal adsorbers, HEPA filters, and heaters, which ensure the SGT System can perform its safety function.	5.5.8	6.2.F.8	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

LD.3	Extends the Frequency from 18 to 24 months for the Surveillances on the CRAF System in place charcoal adsorbers, HEPA filters, and heaters, which ensure the CRAF System can perform its safety function.	5.5.8	6.2.F.8	10
L.1	Relaxes the requirement that sampling and verification that new fuel oil meets ASTM standards for particulate contamination prior to addition to the fuel oil storage tanks by allowing the particulate contaminant analyses of the stored fuel be performed every 31 days after the addition of any new fuel oil to the storage tanks. Deletes the requirement to perform sampling of stored fuel oil every 92 days to verify "kinematic viscosity" within ASTM limits. Replaces the requirement to perform sampling of stored fuel oil every 92 days to verify "water and sediment" within ASTM limits with a clear and bright "appearance" test. Modifies the acceptance criterion for the particulate contamination limit from < 10 mg/liter less than or equal to 10 mg/liter.	5.5.10.b, 5.5.10.c	4.8.1.1.2.c.2, 4.8.1.1.2.c.1	3
5.6, Reporting Requirements				
L.1	Relaxes the requirement for submitting the Occupational Radiation Exposure Report and the requirement for submitting the Annual Radiological Environmental Operating Report from prior to March 1 and May 1 of each year, respectively to by April 30 and May 15 of each year, respectively	5.6.1, 5.6.2	6.6.A.2, 6.6.A.3	6
5.7, High Radiation Areas				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.1.E/F, Training				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
 CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

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				
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				
L.1	Relaxes the reporting requirement for the submittal of major changes to the radioactive waste treatment system in the Monthly Operating Report to requiring the submittal in the Radioactive Release Report.		N/A	6.9.1.a, 6.6.A.5
				9

TABLE L - LESS RESTRICTIVE CHANGES MATRIX  
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 months