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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.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."	1.1 CHANNEL FUNCTIONAL TEST definition	1.0	3
L.2	CTS 1.0 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 Vl 56 No 98 May 21, 1991).	1.1 DOSE EQUIVALENT I-131 definition	1.0	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Deletes the requirement to maintain the reactor vessel water level greater than or equal to 12 inches above the top of active fuel during operations in MODES 3, 4, and 5.	N/A	2.1.D	1
L.2	Deletes directions for the methods of restoring reactor vessel water level (manually initiate the ECCS, after depressurizing the reactor vessel, if required) to allow operator flexibility in determining the best method to restore the reactor vessel water level.	N/A	2.1.D	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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.B	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.C. 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.C	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN				
L.1	Revises 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	3.3.A Action 3	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	3.3.A Action 3	4
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	3.3.B Action	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	4.3.B.1	3
L.3	Revises the frequency "31 effective full power days" (approximately 625 MWD/T), with "1000 MWD/T during operations in MODE 1."	SR 3.1.2.1	4.3.B.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

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	3.3.C Actions 1.a and 2.a	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	3.3.C Action 1.a.2)	6
L.3	Not Used.	N/A	N/A	N/A
L.4	Revises the time to demonstrate SHUTDOWN MARGIN from 24 hours to 72 hours to provide a reasonable time to perform the analysis or test.	3.1.3 Required Action A.4	3.3.C Action 1.c, 4.3.A.2	6
L.5	Revises the requirement to 1) extend the time allowed to 3 hours (ITS 3.1.3 Required Action C.1) to complete the insertion of all inoperable non-stuck control rods, and 2) add an additional hour is provided to disarm the associated CRD (ITS 3.1.3 Required Action C.2), 1 hour beyond that allowed to insert in recognition of the potential for excessive haste required to complete this task.	3.1.3 Required Action C.1 and C.2	3.3.C Action 2, 3.3.H Action1, 3.3.I Action 1	6
L.6	Deletes the CTS 3.3.D Action 2 requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time is deleted. In addition, since the shutdown requirement ("with the provisions of the ACTION(s) above not met, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.3.D Action 2 (since a control rod can always be declared inoperable), this part of CTS 3.3.D Action 2 has also been deleted.	N/A	3.3.D Action 2	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Deletes the coupling requirements during refueling (OPERATIONAL MODE 5) specified by CTS 3/4.3.H since only one control rod can be withdrawn from core cells containing fuel assemblies.	N/A	3/4.3.H	2
L.8	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	3.3.H Action 1.b	4
L.9	Deletes the CTS 3.3.H Actions 1.a and 1.a.2) requirements since they are not necessary for ensuring recoupling of the control rod.	N/A	3.3.H Actions 1.a and 1.a.2)	4
L.10	Deletes requirement to verify control rod coupling by observing any indicated response on nuclear instrumentation during withdrawal of a control rod. SR 3.1.3.5, which requires verification that a control rod does not go to the withdrawn overtravel position, provides adequate assurance that the control rods are coupled.	N/A	3.3.H Action 1.a.1)	3
L.11	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 SRs.	N/A	4.3.I.2	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	4.3.D.1.a	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.5, Control Rod Scram Accumulators				
L.1	Revises the requirement to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient in lieu of declaring the control rod inoperable. Additionally, with more than one accumulator inoperable, ITS 3.1.5 ACTIONS B and C provide actions similar to ITS 3.1.5 ACTION A, instead of the CTS 3.3.G Action 1.c requirement to declare the associated control rod inoperable immediately.	3.1.5 Required Action A.1, ACTIONS B and C	3.3.G Actions 1.a.2) and 1.c	4
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	3.3.G Action 1.c.1)	4, 6
3.1.6, Rod Pattern Control				
NONE	NONE	NONE	NONE	NONE
3.1.7, Standby Liquid Control System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SLC System is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves.	SR 3.1.7.8, SR 3.1.7.9	4.4.A.4.a, 4.4.A.4.c	10
3.1.8, SDV Vent and Drain Valves				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the vent and drain valves close in ≤ 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	4.3.K.3	10
Current Specification 3/4.3.J, Control Rod Drive Housing Support				
L.1	Deletes the requirement for the Control Rod Drive Housing Support to be in place.	N/A	3/4.3.J	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.3.N, Economic Generation Control System				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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., ≥ 25% RTP) prior to performing the Surveillance.	SR 3.2.1.1	4.11.A.2	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	4.11.A.3	3
3.2.2, MINIMUM CRITICAL POWER RATIO				
L.1	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., ≥ 25% RTP) prior to performing the Surveillance.	SR 3.2.2.1	4.11.C.2	3
L.2	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	4.11.C.3	3
3.2.3, LINEAR HEAT GENERATION RATE				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
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., ≥ 25% RTP) prior to performing the Surveillance.	SR 3.2.3.1	4.11.D.2	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	4.11.D.3	3
3.2.4, APRM GAIN AND SETPOINT				
L.1	Deletes CTS action requirement to (1) ensure that the adjusted APRM reading does not exceed 100% of RATED THERMAL POWER and (2) post a notice of adjustment on the reactor control panel whenever APRM gain is adjusted so that the APRM readings are greater than or equal to 100% times FRTP times FDLRC.	N/A	3.11.B Action 3 and footnote (b)	4
L.2	The requirement to verify FDLRC or MFLPD/FRTP is 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., ≥ 25% RTP) prior to performing the Surveillance.	SR 3.2.4.1	4.11.B.2	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
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 and the RPS RESPONSE TIME TEST.	SR 3.3.1.1.17, SR 3.3.1.1.18	4.1.A.2, 4.1.A.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 3.3.1.1.15	4.1.A.1 for Table 4.1.A-1 Functional Unit 13	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.16 for Table 3.3.1.1-1 Functions 1.a, 3, 4, 5, 7.b, 8, and 9	4.1.A.1 for Table 4.1.A-1 Functional Units 1.a, 3, 4, 5, 8.a, 9, and 11	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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") or NEDC-31336P-A, “General Electric Instrument Setpoint Methodology.”	Table 3.3.1.1-1	Table 2.2.A-1	1
L.1	Adds an allowance to exclude neutron detectors from the RPS RESPONSE TIME TESTING due to the difficulties of simulating a meaningful signal. The principles of detector operation virtually ensure an instantaneous response time.	SR 3.3.1.1.18 Note 1	N/A	3

L.2	Deletes the IRM, APRM, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 (APRM - MODE 3 only). 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 3.1.A-1 and 4.1.A-1 Functional Units 1, 2.a, 2.d, 13, and 14, Table 3.1.A-1 Actions 12, 17, and 18	1
L.3	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. CTS Action 19 to lock the reactor mode switch in Shutdown is deleted. 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 3.1.A-1 and 4.1.A-1 Functional Units 1.a, 1.b, 13, and 14, Table 3.1.A-1 Actions 13 and 19	2, 8
L.4	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 3.1.A-1 Functional Units 8.a and 8.b, including footnotes (b) and (i), Table 4.1.A-1 Functional Units 8.a and 8.b, including footnotes (j) and (k), Table 3.1.A-1 Action 13	2

L.5	The requirement in CTS Table 3.1.A-1 Actions 13 and 19 requiring the suspension of LPRM replacement if SRM instrumentation is not OPERABLE per CTS 3.10.B has been deleted since the ITS Required Actions are adequate to minimize the reactivity of the core whenever required Functions (IRMs, APRMs, Scram Discharge Volume Water Level, Reactor Mode Switch Shutdown Position, and Manual Scram) are inoperable concurrent with SRM inoperabilities.	N/A	Table 3.1.A-1 Actions 13 and 19	4
L.6	The CTS Table 3.1.A-1 Action 16 requirement to initiate a reduction in THERMAL POWER within 15 minutes has been deleted, since immediate power reduction may not always be the conservative method to assure safety.	N/A	Table 3.1.A-1 Action 16	4
L.7	ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER greater than or equal to 25% RTP.	SR 3.3.1.1.2	Table 4.1.A-1 footnote (d)	3
L.8	Relaxation of CHANNEL CALIBRATION Surveillance Frequency for the reactor recirculation flow portion of Functional Unit 2.b, APRM Flow Biased Neutron Flux—High from 184 days to 24 months.	SR 3.3.1.1.16 for Table 3.3.1.1-1 Function 2.b, SR 3.3.1.1.14 Note 3	4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b	3
L.9	Extends the time to reach < 45% RTP from 2 hours to 4 hours.	3.3.1.1 Required Action E.1	Table 3.1.A-1 Action 16	6
L.10	Deletes the response time for the Manual Scram, Reactor Mode Switch Shutdown Position, IRMs, APRM Neutron Flux Setdown, APRM inoperable and Scram Discharge Volume Water Level, since they are not assumed in any accident analysis.	N/A	4.1.A.3 for Table 3.1.A-1 Functional Units 1.a, 1.b, 2.a, 2.d, 7.a, 7.b, 11, and 12	3

L.11	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 4.1.A-1 footnote (d)	4
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	4.2.G.4	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.C) 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	3.2.G Action 2	8
L.3	Deletes the “prior to” frequency from CTS Surveillances involving prior to startup, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.A and CTS 4.0.D .	SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2,4	4.2.G.3.a, 4.10.B.2.a, 4.10.B.3.a	3
L.4	The CTS requires verifying SRM count rate is at least 3 cps. The ITS allows SRM count rate to be below 3 cps with less than or equal to four fuel assemblies adjacent to the SRM provided no other fuel assemblies are located in the associated core quadrant.	SR 3.3.1.2.4 Note	4.10.B.3	3

L.5	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	3.10.B Action	4
L.6	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	3.10.B Action	4
L.7	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)	4.10.B.1.c	1
L.8	Modifies the SRM count rate requirement to allow count rate to be as low as 0.7 cps, provided the signal-to-noise ratio is $\geq$ 20:1. The optional count rate of at least 0.7 cps with a signal to noise ratio $\geq$ 20:1 is acceptable since the SRMs could still monitor neutron counts with the same confidence as in the current value.	SR 3.3.1.2.4	4.2.G.1, 4.10.B.3	3
3.3.2.1, Control Rod Block Instrumentation				
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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") or NEDC-31336P-A, “General Electric Instrument Setpoint Methodology.”	Table 3.3.2.1-1	Table 3.2.E-1	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

L.1	Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "within 24 hours prior to startup," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable.	N/A	Table 4.2.E-1 Functional Unit 1 "S/U" and footnote (b)	3
L.2	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 ≤ 10% RTP in MODE 2 and after THERMAL POWER is ≤ 10% RTP in MODE 1.	SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note	4.3.L.2, 4.3.L.3	3
L.3	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	3.3.M Action 1.a, 4.3.M.2	3, 4
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	4.2.J.2	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint 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 3.2.J-1	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 ≥ 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 8 hours to 4 hours.	3.3.2.2 Applicability, 3.3.2.2 ACTION B	3.2.J Applicability, Table 3.2.J-1 Action 90.b	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.	3.3.2.2 Required Action B.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 3.3.3.1.3	4.2.F.1 for Table 4.2.F-1 Instrumentation 1, 2, 3, 4, 5, 6, and 12	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.1.3	4.2.F.1 for Table 4.2.F-1 Instrumentation 1, 2, 3, 4, 5, 6, and 12	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	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 3.2.F-1 Actions 60.a and 62.a	5

L.4	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 this Completion Time to 7 days.	3.3.3.1 ACTION C	Table 3.2.F-1 Action 60.b	6
L.5	With one or two drywell area 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 actions in accordance with Specification 5.6.6 and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating actions in accordance with Specification 5.6.6.	3.3.3.1 ACTIONS A, B, C, D, and F	Table 3.2.F-1 Action 61	5, 6
L.6	Changes the Applicability requirement for Drywell Area Radiation Monitors from MODES 1, 2, and 3 to MODES 1 and 2.	3.3.3.1 Applicability	Table 3.2.F-1 and 4.2.F-1 for Instrumentation 12	2
3.3.4.1, ATWS-RPT Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.4.1.5	4.2.C.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.1.4	4.2.C.1 for Table 4.2.C-1 Functional Units 1 and 2	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.3.4.1.4	Table 3.2.C-1	1

L.1	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.	3.3.4.1 Required Action D.1	N/A	5
L.2	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 provides an option to place 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.	3.3.4.1 ACTION A	3.2.C Action 3	4
L.3	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.	3.3.4.1 ACTIONS B and C	3.2.C Actions 5 and 6	1, 6
3.3.5.1, ECCS 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 HPCI Manual Initiation and ADS Initiation Timer and Low Low Water Level Actuation Timer Functions.	SR 3.3.5.1.9	4.2.B.2, 4.2.B.1 for Table 4.2.B-1 Functional Units 3.g, 4.c, and 4.d	10

LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.1.8	4.2.B.1 for Table 4.2.B-1 Functional Units 1.d, 2.d, 4.c, and 4.d	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.2.B-1	1
L.1	CTS Table 3.2.B-1 Action 32, which applies to Functional Units 1.c and 2.c (Reactor Vessel Pressure-Low (Permissive) Functions) in MODES 4 and 5, requires the channels to be placed in the tripped condition within 24 hours. If this Action is not performed, CTS 3.2.B does not provide default actions, thus CTS 3.0.C appears to be applicable. However, CTS 3.0.C does not apply in MODES 4 and 5, therefore 10 CFR 50.35(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 the ITS an alternate action has been added to declare the associated supported subsystems inoperable. In this condition, the ITS will require the associated supported subsystems to be declared inoperable immediately.	3.3.5.1 ACTION H	Table 3.2.B-1 Action 32 for Functional Units 1.c and 2.c	4
3.3.5.2, RCIC System 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 RCIC Manual Initiation Function.	SR 3.3.5.2.6	4.2.D.2, 4.2.D.1 for Table 4.2.D-1 Functional Unit 5	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.2.D-1	1
3.3.6.1, Primary Containment Isolation 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 MSL Tunnel Temperature—High, SLC System Initiation, RCIC Area Temperature—High, and HPCI Area Temperature—High Functions.	SR 3.3.6.1.5 SR 3.3.6.1.7	4.2.A.2, 4.2.A.1 for Table 4.2.A-1 Functional Units 3.e, 4.a, 5.c, and 6.c	10
LE.1	Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.1.6	4.2.A.1 for Table 4.2.A-1 Functional Units 1.a, 1.c, 3.a, 3.c, 3.d, 3.e, 4.b, 5.a, 5.c, 6.a, 6.b, 6.c, and 7.a	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.2.A-1	1

L.1	CTS Table 3.2.A-1 Action 23 requires the affected system isolation valves to be closed within one hour. If this action were not met entry into CTS 3.0.C is required and the plant must within one hour take action to place the unit in a MODE in which the Specification does not apply by placing the plant in MODE 3 in the next 12 hours, and be in at least MODE 4 within the subsequent 24 hours. In lieu of a CTS 3.0.C shutdown, the ITS provides a shutdown to MODE 4 within the Primary Containment Isolation Instrumentation Specification.	3.3.6.1 ACTION G	CTS 3.0.C	4
L.2	The Applicability of the SLC System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements. In addition, 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.	Table 3.3.6.1-1 Function 5.a, 3.3.6.1 ACTION H	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 4.a, Table 3.2.A-1 Action 23	2, 4
L.3	The CTS action, associated with the Reactor Vessel Water Level—Low Function, to close 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 ACTION I	Table 3.2.A-1 Action 23	5
L.4	CTS Table 3.2.A-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 8 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 8 hours to12 hours to allow for more orderly power reduction.	3.3.6.1 ACTION D	Table 3.2.A-1 Action 21	5, 6
3.3.6.2, Secondary Containment Isolation Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.6.2.6	4.2.A.2, 4.7.P.4.b	10

LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.2.5	4.2.A.1 for Table 4.2.A-1 Functional Unit 2.a	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.2.A-1	1
L.1	Isolation of secondary containment on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. 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 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote *	2
L.2	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.C entry would be required, since no further Actions are provided.	3.3.6.2 Required Actions C.1.2 and C.2.2	Table 3.2.A-1 Action 24	4, 5
3.3.6.3, Relief Valve Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.6.3.2	4.6.F.1.b, 4.6.F.1.a	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.3.1	4.6.F.1.b	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.3.6.3-1	3.6.F	1
3.3.7.1, CREV System Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.7.1.6	4.2.A.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.7.1.5	4.2.A.1 for Table 4.2.A-1 Functional Units 2.a and 3.d	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.3.7.1-1	Table 3.2.A-1	1
L.1	With a MSL Flow—High Function channel inoperable and not restored, the CTS requires the plant to be in at least STARTUP with the associated isolation valves closed within 8 hours or be in at least HOT SHUTDOWN within 12 hours and COLD SHUTDOWN within the next 24 hours. In the ITS, the requirement to isolate the associated Main Steam Lines has been retained, however two new options have been added in lieu of requiring the unit to be in startup or to be fully shutdown. The new actions require either the isolation of each required control room penetration flow path within 1 hour or to declare the CREV System inoperable within 1 hour. In addition, the Completion Time to isolate the associated main steam line(s) has been reduced from 8 hours to 1 hour.	3.3.7.1 ACTION D	Table 3.2.A-1 Action 21	5

L.2	Isolation of the CREV System on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic CREV System isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS.	N/A	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote *	2
3.3.7.2, Mechanical Vacuum Pump Trip Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.7.2.5	4.2.L.4	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.7.2.4	4.2.L.3	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint 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 3.3.7.2.4	4.2.L.3	1
3.3.8.1, Loss of Power Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.8.1.3, SR 3.3.8.1.5	4.2.B.1 for Table 4.2.B-1 Functional Units 5.a, 4.2.B.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	4.2.B.1 for Table 4.2.B-1 Functional Units 5.a	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints 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 3.2.B-1	1
L.1	Adds a Note to allow a channel to be inoperable for up to 2 hours solely for performance of required Surveillances provided the associated Function maintains initiation capability for one DG and associated 4160 V ESS bus.	3.3.8.1 Surveillance Requirements Note 2	N/A	6
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	4.9.G.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.2.2	4.9.G.2	10
LF.1	Revises the Current Technical Specifications (CTS) setpoints 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	4.9.G.2.a, 4.9.G.2.b, 4.9.G.2.c	1
L.1	Changes the Applicability from MODES 1, 2, and 3 and MODES 4 and 5 with any control rod withdrawn to only include MODES 1 and 2 and MODE 5 with any control rod withdrawn, consistent with the Applicability of the RPS Instrumentation, which is the equipment required to be protected by the RPS Electric Power Monitoring Assemblies. In addition, modifies CTS 4.9.G footnote (b) to require performance of the Channel Functional Test Surveillance prior to entry into MODE 2, consistent with the change to the Applicability.	3.3.8.2 Applicability, SR 3.3.8.2.1 Note	3.9.G Applicability, 4.9.G footnote (b)	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	3.9.G Action 2	6

L.3	The CTS Applicability is modified from requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	3.3.8.2 Applicability	3.9.G footnote (a)	2
L.4	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 MODE 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 a new ACTION if the Required Actions of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. The ITS requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	3.3.8.2 ACTION D	N/A	5
Current Specification 3/4.2.H, Explosive Gas Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation				
NONE	NONE	NONE	NONE	
Current Specification 3/4.2.K, Toxic Gas Monitoring				
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	Deletes the explicit requirement in CTS 3.6.A Action 1.e to electrically prohibit the idle recirculation pump from starting except to permit testing in preparation for returning the pump to service.	N/A	3.6.A Action 1.e	4
L.2	Replaces the required action of CTS 3.6.C Action 2 to trip one of the recirculation pumps when the speed mismatch (i.e. flow mismatch) is not within limits with a requirement (ITS 3.4.1 ACTION B) to declare the loop with the low flow "not in operation." Once the declaration has been made, the appropriate actions for single loop operation must be taken in accordance with CTS 3.6.A.1 (ITS 3.4.1).	3.4.1 ACTION B	3.6.C Action 2	4
L.3	CTS 4.6.C requires the recirculation pump speed mismatch (i.e., jet pump loop flow mismatch in ITS) to be verified within the limits once per 24 hours when in Operational MODES 1 and 2 during two recirculation loop operation. Since CTS 4.6.C cannot be performed prior to its Applicability (as required by CTS 4.0.D) 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

L.4	CTS 3.6.C requires the recirculation pump speeds to be maintained within prescribed limits. With THERMAL POWER ≥ 80% of RATED THERMAL POWER the recirculation pump speeds must be within 10% of each other, and with THERMAL POWER < 80% of RATED THERMAL POWER, recirculation pump speeds must be within 15% of each other. In proposed SR 3.4.1.1, the jet pump loop flow mismatch with both recirculation loops in operation is: ≤ 10% of rated core flow when operating at < 70% of rated core flow; and ≤ 5% of rated core flow when operating at ≥ 70% of rated core flow. The required loop mismatch criteria has been changed from a recirculation pump speed comparison to a core flow comparison. In addition, the cutoff point for the criteria is with respect to total core flow instead of thermal power level. The proposed mismatch tolerance is actually smaller than in CTS at high pump speeds and larger than in CTS at lower pump speeds, therefore the change is considered less restrictive.	SR 3.4.1.1	3.6.C	1
3.4.2, Jet Pumps				
L.1	Deletes the requirements of CTS 3.6.B and associated Action 2 concerning jet pump flow indication since it does not necessarily relate directly to the structural integrity of the jet pumps.	N/A	3.6.B, Action 2	1, 4
L.2	Adds a Note to CTS 4.6.B.1 and CTS 4.6.B.2 (proposed SR 3.4.2.1 Note 1), to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation. The Note allows the Surveillance not to be performed until four hours after the associated recirculation loop is in operation, because these checks can only be performed during jet pump operation (i.e., when the loop is in operation).	SR 3.4.2.1 Note 1	N/A	3
3.4.3, Safety and Relief Valves				

L.1	Deletes the requirement of CTS 3.6.F Action 1 for an open relief valve to be closed provided the suppression pool temperature is <110°F. If unable to close the open relief valve, or if suppression pool temperature is ≥ 110°F, the reactor mode switch must be placed in shutdown.	N/A	3.6.F Action 1	4
3.4.4, 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 3.4.4.1	4.6.H.2	3
3.4.5, 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 3.4.5.3	4.6.G.2	10
L.1	Adds a Note that LCO 3.0.4 is not applicable for the condition of the drywell floor drain sump monitoring system inoperable or the primary containment atmospheric particulate monitoring system inoperable.	3.4.5 ACTIONS A and B Note	N/A	7
L.2	CTS 3.6.G Action 1 requires the restoration of the inoperable primary containment atmospheric particulate radioactivity sampling system leakage detection system to OPERABLE status within 24 hours. Proposed ITS 3.4.5, Required Action B.2 requires an inoperable primary containment atmospheric monitoring system be restored to OPERABLE status within 30 days.	3.4.5 Required Action B.2	3.6.G Action 1	6
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 instrumentation is OPERABLE.	3.4.5 Surveillance Requirements Note	N/A	6
3.4.6, RCS Specific Activity				

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

NONE	NONE	NONE	NONE	NONE
3.4.7, RHR Shutdown Cooling System - Hot Shutdown				
L.1	Adds proposed LCO 3.4.7 Note which allows one RHR shutdown cooling subsystem to be inoperable up to 2 hours to perform Surveillances since tests are required that necessitate leaving the RHR Shutdown Cooling System in an inoperable status during the performance.	LCO 3.4.7 Note	N/A	1
L.2	Adds a Note making 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.	SR 3.4.7.1 Note	N/A	7
3.4.8, RHR Shutdown Cooling System - Cold Shutdown				
L.1	Adds proposed LCO 3.4.8 Note which allows one RHR shutdown cooling subsystem to be inoperable up to 2 hours to perform Surveillances since tests are required that necessitate leaving the RHR Shutdown Cooling System in an inoperable status during the performance.	LCO 3.4.8 Note	N/A	1
L.2	Deletes the requirement in CTS 3.6.P Action 2 to immediately initiate corrective action to return at least one subsystem to OPERABLE status as soon as possible.	N/A	3.6.P Action 2	4
3.4.9, RCS Pressure and Temperature (P/T) Limits				

L.1	CTS 3.6.K Action 2 specifies a Completion Time of 72 hours for the required engineering evaluation with an LCO applicability of "at all times." Proposed ITS 3.4.9, Required Action C.2, (applicable when in conditions other than MODES 1, 2, and 3) requires completion "prior to entering MODE 2 or 3." While Required Action C.2 is intended to be initiated without delay, it is not restricted to a specified Completion Time, only by a restriction on returning to (entering) operating MODES (i.e., 1, 2, or 3) where additional stresses (heatup/criticality) may be imposed.	3.4.9 Required Action C.2	3.6.K Action 2	6
L.2	CTS 4.6.K.2.a requires the rate of change of primary system coolant temperature to be determined within limits 15 minutes prior to withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown. The requirement to verify the rate of change during the 15 minute period prior to withdrawal of control rods has been deleted, however, the Frequency of once every 30 minutes has been retained as proposed in SR 3.4.9.1 during heatup and cooldown.	N/A	4.6.K.2.a	3
3.4.10, Reactor Steam Dome Pressure				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.6.N, 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 of HPCI system flow, verification that 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; and manually opening each required ADS valve.	SR 3.5.1.7, SR 3.5.1.8, SR 3.5.1.9, SR 3.5.1.10	4.5.A.3.a, 4.5.A.3.b.1), 4.5.A.3.b.2), 4.5.A.4.a, 4.5.A.4.b	10
L.1	Reduces the number of ADS valves required to be OPERABLE in CTS 3.5.A.4 from five to four based on the analysis summarized in the UFSAR.	LCO 3.5.1	3.5.A.4	1
L.2	Deletes the ECCS discharge line keep fill alarm instrumentation, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	3.5.A Action 5, 4.5.A.3.c	3, 4
L.3	Adds ITS 3.5.1 ACTION G for the condition of HPCI inoperable coincident with one low pressure coolant injection subsystem (or one LPCI pump in each subsystem) inoperable. The current Technical Specifications require entry into Specification 3.0.C (ITS LCO 3.0.3) for these conditions, implying that the plant is outside design basis. The analyses summarized in the UFSAR demonstrate that adequate core cooling is provided by the OPERABLE HPCI and the remaining OPERABLE low pressure injection/spray systems.	3.5.1 ACTION G	N/A	5
L.4	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.A Action 7	9
3.5.2, ECCS-Shutdown				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that verifies the CS and LPCI functional test on an actual or simulated automatic initiation signal.	SR 3.5.2.5	4.5.B	10

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

L.1	Deletion of requirements to: 1) suspend CORE ALTERATIONS when both ECCS subsystems are inoperable; and 2) suspend CORE ALTERATIONS when the suppression pool water level requirement is not within limit.	N/A	3.5.B Action 2, 3.5.C Action 2	4
L.2	Relaxes the limitation in CTS 3.5.C if the water source is only available from the CCST and OPDRVs are in progress. If OPDRVs are in progress only one ECCS subsystem is allowed to credit the CCST as indicated in proposed Note to SR 3.5.2.1.b, therefore, one ECCS subsystem must be declared inoperable. This is necessary since the available volume is limited. This will therefore limit the time that OPDRVs can be performed, since an ECCS subsystem must be declared inoperable and ITS 3.5.2 Required Action A.1 only provides 4 hours to restore the inoperable ECCS subsystem to OPERABLE status prior to suspending OPDRVs. Therefore, when credit is being taken for the CCST and the suppression pool level is not within limits operations must be in accordance with ITS 3.5.2 ACTIONS A and B, where the Required Action of Condition B precludes OPDRVs (note that Condition B applies 4 hours after Condition A, i.e., one ECCS subsystem inoperable, is entered).	3.5.2	3.5.C	5
L.3	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.C.2.b	8
L.4	Revises CTS 4.5.C.2.b, the verification that the requirements in CTS 3.5.C.2 are satisfied every 12 hours when the suppression chamber water level limit is not met, to only require the Surveillances to be verified at the current specified frequencies not at this 12 hour frequency.	SR 3.5.2.1.b	4.5.C.2.b	3
L.5	Decreases condensate storage tank water level requirement from 140,000 available gallons to 50,000 available gallons.	SR 3.5.2.1.b	3.5.B.1.a.2), 3.5.B.2.b.2), 3.5.C.2.c	1, 3
3.5.3, RCIC System				

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

LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillances that provide 1) an RCIC system functional test, and 2) an RCIC low pressure flow test.	SR 3.5.3.4, SR 3.5.3.5	4.5.D.3.a, 4.5.D.3.b, 4.5.D.3.c	10

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 routine Surveillance Frequency from 18 months to 24 months and relaxation of additional tests required if routine test fails two times in a row from 9 months to 12 months for performing the drywell-to-suppression chamber bypass leakage test.	SR 3.6.1.1.2	4.7.K.5	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. 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	3.0.C	6
L.2	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	4.7.K.5	9
L.3	Not used.			
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	3.7.C ACTIONS	4
L.2	Not used.			

L.3	Adds ITS Required Action Notes 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 Actions A.3 and B.3 Notes	3.7.C ACTIONS	4
L.4	CTS 3.7.C Action 1 footnote (b) limits the time an inoperable primary containment air lock door can be used to facilitate the removal of personnel for a cumulative time not to exceed one hour per year. The ITS does not include a cumulative time period per year to limit entry and exit into the primary containment with one inoperable air lock door, however, the use of the air lock will be limited to an explicit time period for any single entry into the Condition as long as administrative controls are imposed. ITS 3.6.1.2 Required Action A Note 2 is added to the Technical Specifications to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for 7 days under administrative controls. The new allowance is proposed to have strict administrative controls, which are detailed in the Bases.	3.6.1.2 Required Action A Note 2	3.7.C Action 1 footnote (b)	4
L.5	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	4.7.C.2 including footnote (e)	3
L.6	Deletes requirement to have one air lock door “locked” closed at all times.	N/A	3.7.C Action 2	4
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	4.7.D.2, 4.7.D.4, 4.7.D.5.b	10

L.1	CTS 3.7.D Action 1 requires an inoperable PCIV (except for MSIVs and reactor building-suppression chamber vacuum breakers) to be restored or the affected penetration isolated in 4 hours. The ITS allows 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 Action C.1	3.7.D Action 1	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	3.7.D Action 1.c, 3.6.M Action	4
L.3	In the event two or more valves in a penetration are inoperable, CTS 3.7.D Action 1 and the CTS 3.6.M Action, 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	3.7.D Action 1, 3.6.M Action	6
L.4	Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.7.D and Action 1 footnote (a).	3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2, SR 3.6.1.3.3	3.7.D and Action 1 footnote (a)	1, 4
L.5	Deletes CTS 4.7.D.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.D.1	3
L.6	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	4.7.D.2	3
L.7	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 3.6.1.3.8	4.7.D.4	3

L.8	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	3.7.D Action 2	6
L.9	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	4.7.A.2, including footnote (b)	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, regardless of whether or not the isolation devices are inside the primary containment. 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, 3.6.1.3 Note 2 to Required Actions A.2 and C.2	4.7.A.2 footnote (b)	3, 4
3.6.1.4, Drywell Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves				

L.1	Deletes the CTS requirement to place the reactor mode switch in shutdown if unable to close the open relief valve or if suppression pool temperature is $\geq$ 110°F, since Required Action D.1 of ITS 3.6.2.1 will also require that the reactor mode switch be immediately placed in shutdown if the suppression pool average temperature is $\geq$ 110°F.	N/A	3.7.F Action 1	5
3.6.1.7, Reactor Building-to-Suppression Chamber 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 3.6.1.7.3	4.7.F.2.b.1)	10
L.1	Adds an ACTION to allow two lines to have all vacuum breakers inoperable for opening for up to one hour without requiring a shutdown, as is currently required by CTS 3.0.C.	3.6.1.7 ACTION D	3.0.C	6
L.2	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.F Action 3, 4.7.F.2.a.2), 4.7.F.2.b.2)	1, 3, 4
L.3	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.7.1	4.7.F.1	3
L.4	Adds a Note to the Surveillance to allow vacuum breakers to be open during the performance of required Surveillances.	SR 3.6.1.7.1, Note 1	4.7.C	3
3.6.1.8, 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 3.6.1.8.3	4.7.E.2.c.1)	10

L.1	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.E Action 3, 4.7.E.2.b, 4.7.E.2.c.2), 4.7.E.2.c.3)	1, 3, 4
L.2	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.8.1	4.7.E.1	3
L.3	Adds a Note stating that the vacuum breakers can be opened when performing required Surveillances. CTS requires that the vacuum breakers be closed at all times; with no allowance for opening during performances of required Surveillances.	SR 3.6.1.8.1 Note 1	4.7.E.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	3.7.K Action 4	4
L.2	When the suppression pool temperature is > 95°F but ≤ 110°F, the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is > 95°F and ≤ 110°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.1, SR 3.6.2.1.1	4.7.K.2.c, 4.7.K.2.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	3.7.K Action 1, 3.5.C Action 1	6

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

3.6.2.3, RHR Suppression Pool Cooling				
L.1	Adds a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable. Currently, no time is provided; CTS 3.7.M Action 2 requires a unit shutdown.	3.6.2.3 ACTION B	3.7.M Action 2	6
3.6.2.4, RHR Suppression Pool Spray				
NONE	NONE	NONE	NONE	NONE
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure				
L.1	Deletes the drywell-suppression chamber differential pressure instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.H Actions 2, 3, and 4, 4.7.H.2	1, 3, 4
3.6.3.1, Primary Containment Oxygen Concentration				
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 4.7.N.3, which ensures that the Secondary Containment is OPERABLE.	SR 3.6.4.1.3	4.7.N.3	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	4.7.O.2	10
L.1	Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves under, other than those currently allowed to be opened using CTS 4.7.N, footnote (a) (locked or sealed-closed penetrations).	3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2	4.7.N footnote (a)	1
L.2	In the event both valves in a penetration are inoperable in an open penetration, the CTS 3.7.O Action, which requires maintaining one isolation valve 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	3.7.O Action	6
L.3	Deletes CTS 4.7.O.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.O.1	3
L.4	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	4.7.O.2	3
L.5	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	4.7.N.2.b	3, 4
3.6.4.3, Standby Gas Treatment System				

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

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	4.7.P.4.b	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	3.7.P Action 1.b	5
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	4.7.P.4.b	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.7.1, Residual Heat Removal Service Water System				
NONE	NONE	NONE	NONE	NONE
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	4.8.B.2	10
L.1	Adds the phrase “actual or simulated” in reference to the actuation test signal that verifies that each DGCW subsystem pump starts.	SR 3.7.2.2	4.8.B.2	3
3.7.3, Ultimate Heat Sink				
NONE	NONE	NONE	NONE	NONE
3.7.4, Control Room Emergency Ventilation System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV System automatic isolation and operation Surveillances.	SR 3.7.4.3, SR 3.7.4.4	4.8.D.5.b, 4.8.D.5.c	10
L.1	Adds the phrase "actual or," in reference to the actuation test signal that verifies that each CREV subsystem isolation dampers close on an actuation test signal.	SR 3.7.4.3	4.8.D.5.b.2)	3
L.2	Deletes the requirement to verify the isolation dampers close on a manual initiation from the control room, since the Control Room Manual Initiation Function is not credited in any design bases accident or transient analysis.	N/A	4.8.D.5.b.1)	3

3.7.5, Control Room Emergency Ventilation Air Conditioning System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV Air Conditioning System operation Surveillance.	SR 3.7.5.1	4.8.D.1	10
3.7.6, Main Condenser Offgas				
L.1	Extends the time allowed to close the main steam isolation valves from 8 hours to 12 hours. Also deletes the explicit requirement to be in STARTUP since the closure of all main steam line isolation valves will require the mode switch to be placed in the startup/hot standby position to avoid a scram on Main Steam Line Isolation Valve— Closure.	3.7.6 ACTION B	3.8.I Action	5, 6
L.2	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
L.3	CTS 4.8.I.2.b requires the main condenser offgas activity to be determined within 4 hours following the determination of an increase of 50%. The ITS requires the performance of this Surveillance at the same Frequency, however it is modified to allow factoring out increases in activity as a result of a THERMAL POWER increase.	SR 3.7.6.1	4.8.I.2	3
L.4	Adds a finite time limit to allow the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation.	SR 3.7.6.1 Note	4.8.I.2 footnote (b)	3
3.7.7, Main Turbine Bypass System				
NONE	NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level				

NONE	NONE	NONE	NONE	NONE
3.7.9, Safe Shutdown Makeup Pump System				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.E, Flood Protection				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.F, Snubbers				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination				
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; load block interval test; and LOCA/LOOP test.	SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, 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	4.9.A.1.b, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g, 4.9.A.8.h, 4.9.A.8.j, 4.9.A.8.k	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 "14 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3 and B.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 and B.4	3.9.A Actions 1.b, 2.c, 3.d	6
L.2	Deletes the CTS requirement to complete the diesel start test for failures that are potentially generic regardless of when the inoperable diesel is restored to operable status.	N/A	3.9.A Action 2.b footnote (b)	4

L.3	CTS 3.9.A Action 2.b requires a verification within 24 hours and every 72 hours thereafter that the cause of a DG inoperability does not affect the remaining DGs. CTS 3.9.A Action 3.b requires a verification within 8 hours and every 72 hours thereafter, the that the cause of a DG inoperability does not affect the remaining DGs. In both Actions, the initial evaluation or test is not required if a test was performed in the past 24 hours. In addition, when two DGs are inoperable, CTS 3.9.A Action 6.c requires the performance of CTS 4.9.A.2.c (DG slow start) within the subsequent 72 hours after a DG is restored to service. ITS 3.8.1 Required Actions B.3.1 and B.3.2 will continue to require this verification, but will allow 24 hours to perform the verification, and there will be no requirement to re-test the OPERABILITY of the OPERABLE DG.	3.8.1 Required Actions B.3.1 and B.3.2	3.9.A Actions 2.b, 3.b, and 6.c	6
L.4	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	4.9.A.2.e	3
L.5	CTS 4.9.A.3 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; the frequency of "after each operation of the diesel where the period of operation was greater than or equal to 1 hour" has been deleted.	SR 3.8.1.5	4.9.A.3	3
L.6	The Completion Time to verify that required systems, subsystems, trains, components, and devices powered from the redundant DG(s) are OPERABLE has been extended from 2 hours to 4 hours.	3.8.1 Required Action B.2	3.9.A Actions 4.a and 6.b	6
L.7	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.	SR 3.8.1.8, SR 3.8.1.13	4.9.A.7, 4.9.A.8.e	3

L.8	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 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, and 4.9.A.8.g 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 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14	4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g	3
L.9	The manner in which the DG is started for CTS 4.9.A.8.h (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.	SR 3.8.1.15	4.9.A.8.h	3
L.10	Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.9.A.9 (i.e., after any modifications which could affect DG interdependence).	N/A	4.9.A.9	3
L.11	CTS 4.9.A.9 requires the DGs to accelerate to 900 rpm in $\leq$ 10 seconds. For these DGs, 900 rpm is equivalent to a frequency of 60 Hz. The ITS will require the minimum frequency to be 58.8 Hz, as shown in ITS SR 3.8.1.20, since the accident analysis requires the DG to be capable of being loaded within 10 seconds (this can be accomplished at 58.8 Hz).	SR 3.8.1.20	4.9.A.9	3
L.12	The load range requirements of CTS 4.9.A.2.d, CTS 4.9.A.8.c, and CTS 4.9.A.8.h (the 22-hour load requirements only) have been relaxed slightly to provide margin to the DG's continuous rating. The new load range in ITS SRs 3.8.1.3, 3.8.1.11, and 3.8.1.15 is 90% to 100% of the continuous rating (2340 kW to 2600 kW).	SR 3.8.1.3, SR 3.8.1.11, SR 3.8.1.15	4.9.A.2.d, 4.9.A.8.c, 4.9.A.8.h	3
L.13	Deletes CTS 4.9.A.8, footnote (d), which restricts the performance of CTS 4.9.A.8.c, the DG full load rejection test, and CTS 4.9.A.8.h, the DG 24 hour endurance run, to only one DG at a time.	N/A	4.9.A.8 footnote (d)	3
L.14	Deletes CTS 4.9.A.8.k upper load block limit, such that the interval between each load block is only required to be $\geq$90% of the design load interval.	SR 3.8.1.18	4.9.A.8.k	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	4.9.B	3
L.2	CTS 4.9.B, 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 4.9.A to be performed. Two of the Surveillances of CTS 4.9.A 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	4.9.B	3
L.3	An alternative is proposed in the ITS to suspend the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.2 Required Action A.1	3.9.B Action 1	4
3.8.3, Diesel Fuel Oil and Starting Air				
L.1	CTS 3.9.A Action 7 provides a 7 day restoration period for the new fuel oil parameters tested by CTS 4.9.A.5 when they are found not within specified limits. In addition, CTS 3.9.B provides no restoration time when the fuel oil parameters are not within the limits of CTS 4.9.A.5 and 4.9.A.6 in MODES 4 and 5 and when handling irradiated fuel in the secondary containment. ITS 3.8.3 ACTION B will allow 30 days to restore new fuel properties to within the specified limits. If not restored, ITS 3.8.3 ACTION D is provided to declare the DG inoperable. In addition, a 7 day time has been provided in ITS 3.8.3 ACTION A to restore stored fuel oil total particulates to within limits when in MODE 4 or 5, or when handling irradiated fuel in the secondary containment.	3.8.3 ACTIONS A, B, and D	3.9.A Actions, 3.9.B Actions	6

L.2	The diesel starting air parameter, while supporting DG OPERABILITY, contain substantial margin in addition to the limit which would be absolutely necessary for DG OPERABILITY. Therefore, a certain level of degradation in this parameter is justified to extend the allowance for restoration (presented as ITS 3.8.3 ACTION C and ACTIONS Note). During the extended restoration period for this parameter, the DG would still be capable of performing its intended function. ACTION C allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION D is provided to declare the DG inoperable if the previous ACTION is not met. During the proposed extended period for restoration of this parameter, the DG would still be capable of performing its intended function.	3.8.3 ACTIONS Note, 3.8.3 ACTIONS C and D	3.9.A Actions, 3.9.B Actions	6
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	4.9.C.3, 4.9.C.4	10
L.1	Removes from CTS 4.9.C.2 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 $X10^{-6}$ohm or 20% above baseline connection resistance.	N/A	4.9.C.2	3
L.2	CTS 4.9.C.3.b requires 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	4.9.C.3.b	3

3.8.5, DC Sources - Shutdown				
L.1	Three of the DC sources Surveillances required to be performed by CTS 4.9.D (CTS 4.9.C.4, 4.9.C.5, and 4.9.C.6) involve tests that would cause the only required OPERABLE unit 250V 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 250V DC battery 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	An alternative is proposed in the ITS to suspend operations if a DC Source is inoperable, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.5 Required Action A.1	3.9.D Action	4
3.8.6, Battery Cell Parameters				
L.1	Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 65°F within 7 days after a battery discharge or overcharge.	N/A	4.9.C.2	3
L.2	Changes the CTS 4.9.C.2.c requirement, which requires measurement of the temperature for all connected cells every 92 days, to only require representative cells (10% of the total, as defined in the Bases) be verified within limits every 92 days.	SR 3.8.6.3	4.9.C.2.c	3

L.3	The time specified in CTS 3.9.C Actions 4 and 5 to restore Category A and B battery cell parameters to within limits has been extended from the next 6 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	3.9.C Actions 4 and 5	6
L.4	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 4.9.C-1	1
L.5	CTS 4.9.D requires the batteries and chargers to be demonstrated OPERABLE per the Surveillance Requirements of CTS 4.9.C. The CTS 4.9.C requirements include battery cell parameter Surveillances. However, the CTS 3.9.D Action does not provide any specific actions for when battery cell parameters are exceeding the limits in CTS 4.9.C. Therefore, the associated DC electrical power sources must be declared inoperable and the Action of CTS 3.9.D must be taken immediately. In lieu of taking the CTS 3.9.D Action immediately, ITS 3.8.6 ACTION A will provide time to restore the Category A and B battery cell parameters prior to declaring the associated DC power source inoperable and taking the Action of CTS 3.9.D (ITS 3.8.5 ACTION A). ITS 3.8.6 ACTION B will require the associated battery to be declared inoperable (thus requiring ACTION A of ITS 3.8.5 to be taken) if ACTION A is not met, if the Category C battery cell parameters are not met, or if the electrolyte temperature is not within the limit. Furthermore, if the requirements of LCO 3.8.6 are not met, the associated battery must be declared inoperable, therefore, LCO 3.8.4 requirements must also be met.	3.8.6 ACTIONS A and B	3.9.D Action	6
3.8.7, Distribution Systems - Operating				

L.1	CTS 3.9.E Action 1 allows 8 hours to restore one inoperable AC subsystem and CTS 3.9.E Action 2 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.C. 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 E is also added to require that if two or more electrical power distribution subsystems are inoperable and, in combination, result in a loss of function, then ITS 3.0.3 must be entered immediately.	3.8.7 ACTIONS B and E	3.9.E Actions 1 and 2	6
3.8.8, Distribution Systems - Shutdown				
L.1	An alternative is proposed in the ITS to suspend the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.8 Required Action A.1	3.9.F Action	4

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	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 4.10.A.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	4.10.A.2	3
L.2	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 ALTERATION(s) 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	4.10.A.3	3
L.3	Adds actions to allow a control rod block to be inserted and to verify all control rods 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
3.9.2, Refuel Position One-Rod-Out Interlock				
L.1	Deletes the requirement to “lock” the mode switch in Shutdown.	N/A	3.10.A, 3.10.A Action 1, 4.10.A.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	3.10.A Actions 1 and 2	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 4.10.A.1.b "within 2 hours prior" and CTS 4.10.A.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	4.10.A.1.b, 4.10.A.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	4.10.A.3	3
3.9.3, Control Rod Position				
L.1	Revises the Applicability that all control rods be fully inserted in Operational MODE 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	3.10.C, 3.10.C Action	2, 4
L.2	Deletes the requirement to perform CTS 4.10.C.2 "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	4.10.C.2	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	3.3.I, 3.3.I Action 3, 4.3.I.1, 4.3.I.2	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 4.10.G "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	4.10.G	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 current Specification 3.10.G, which provides reactor vessel water level requirements during handling of fuel assemblies and 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 3.10.G.	LCO 3.9.7	3.10.G	1
L.2	Deletes the requirement to perform CTS 4.10.G "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	4.10.G	3
3.9.8, Residual Heat Removal (RHR) - High Water Level				
NONE	NONE	NONE	NONE	
3.9.9, Residual Heat Removal (RHR) - Low Water Level				
L.1	Revises the requirement of CTS 3/4.10.L to allow both pumps in the same loop OPERABLE instead of the current requirement to have a pump in each loop. CTS 3/4.10.L requires two shutdown cooling mode loops of the Residual Heat Removal (RHR) System to be OPERABLE with each loop consisting of at least one OPERABLE RHR pump and one OPERABLE RHR heat exchanger. ITS 3.9.9 requires two RHR shutdown cooling subsystems to be OPERABLE. To meet the LCO both pumps in one loop or one pump in each of the two loops must be OPERABLE.	3.9.9	3/4.10.L	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.10.E, Communications				
NONE	NONE	NONE	NONE	

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

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.	3.10.1	Table 1-2 footnote (a), 4.10.A.2 and 4.10.A.3 footnote (d)	1
3.10.2, Single Control Rod Withdrawal - Hot Shutdown				
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel.	N/A	3.10.A, 4.10.A.1	8
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	3.10.I.1, 4.10.I.1, 3.10.A, 3.10.A.1	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 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.10.I “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	4.10.I	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	3.10.I.1, 4.10.I.1	1, 8
L.2	Deletes the requirement to perform CTS 4.10.I “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	4.10.I	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	3.10.J.1, 4.10.J.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.10.J “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	4.10.J.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

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 3.10.J, 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	4.10.J.2	3
3.10.6, Control Rod Testing - Operating				
L.1	Adds Special Operations Technical Specification to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing, provided the analyzed rod position sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or other qualified member of the technical staff. These two requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA).	3.10.6	N/A	1
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 3.10.7.4	4.12.B	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.12.A, Primary Containment Integrity				
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				
L.1	Deletes the requirement for an SRO to be present in the control room while the unit is in MODE 4.	N/A	6.2.B.2	1
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	Relaxation of Surveillance Frequency from 18 to 24 months for the requirement establishing a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels.	5.5.2.b	6.8.D.1.b	10

LD.2	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SGT System inplace charcoal adsorbers, HEPA filters, and heaters perform their safety function.	5.5.7	4.7.P.2.a, 4.7.P.2.b, 4.7.P.2.c, 4.7.P.4.a, 4.7.P.4.c	10
LD.3	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that in-place Control Room Emergency Ventilation System charcoal adsorbers, HEPA filters, and heaters are capable of performing their safety function.	5.5.7	4.8.D.3.a, 4.8.D.3.b, 4.8.D.3.c, 4.8.D.5.a, 4.8.D.5.d	10
L.1	Revises the requirements to allow 1) new fuel oil to meet either the ASTM standard for API gravity or absolute specific gravity; 2) the performance of a clear and bright appearance test with proper color or a water and sediment test; 3) "water and sediment" analyses of the stored fuel to be performed within 31 days after the addition of any new fuel oil; and 4) excluding, for bulk stored fuel oil, the 31 day requirement to verify "water and sediment" and "kinematic viscosity" and providing a limit for particulate contaminants of $\leq$ 10 mg/liter.	5.5.9.a.1, 5.5.9.a.3, 5.5.9.b, 5.5.9.c,	4.9.A.5.b, 4.9.A.6.b	3
5.6, Reporting Requirements				
L.1	Revises the requirement for submitting the Annual Radiological Environmental Operating Report and Radioactive Effluent Release Report from prior to May 1 and April 1 of each year, respectively, to by May 15 and prior to May 1 of each year, respectively.	5.6.2, 5.6.3	6.9.A.3, 6.9.A.4	6
5.7, High Radiation Area				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.4, Training				

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

NONE	NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program				
NONE	NONE	NONE	NONE	NONE

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