

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	1.0	1.0
A2	Certain CTS definitions that are not used in the ITS are replaced by terms and definitions that are used in the ITS.	1.0	1.0
A3	Not used.		
A4	Not used.		
A5	Not used.		
A6	CTS define "Reactor Critical" as a self-sustaining neutron reaction and $k_{eff} = 1.0$. However, CTS LCOs that apply when the reactor is critical also apply during approaches to criticality and power level changes. The equivalent ITS definition calls the same condition "Startup" and specifies the condition that places the reactor in Mode 2 as $K_{eff} \geq 0.99$. This is an equivalent administrative change and is consistent with industry practice.	Table 1.1-1	1.2.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	The CTS definition of "Power Operation" specifies that neutron flux power range instrumentation is used to determine when reactor power is high enough so that the reactor is considered in Power Operation. The equivalent ITS definition keeps this clarification. This is an equivalent administrative change.	Table 1.1-1	1.2.4
A8	The CTS definition of "Refueling" specifies that the reactor is in Refueling when it is subcritical by at least 5% $\Delta k/k$. The equivalent ITS definition does not specify a reactivity condition needed to be in Refueling, but ITS require that boron concentration in the RCS during refueling must maintain $k_{off} \leq 0.95$ during fuel handling. This is an equivalent administrative change.	LCO 3.9.1	1.2.5
A9	The CTS definition of "Refueling Operation" specifies that refueling exists only when core alterations are being made, but CTS LCOs and Required Actions (RAs) differentiate between refueling conditions with and without core alterations in progress. The equivalent ITS definition in ITS Table 1.1-1 specifies that refueling exists when one or more reactor vessel head closure bolt is less than fully tensioned without regard to the status of core alterations, but, as in the CTS, ITS LCO Applicability statements and RAs differentiate between refueling conditions with and without core alterations in progress. Not including the condition that core alterations are in progress in the definition of refueling is an administrative change because any technical changes to existing requirements are identified and justified with the applicable LCOs. Therefore, this is an equivalent administrative change with no effect on safety.	Table 1.1-1	1.2.5
A10	CTS identify activities classified as Core Alterations because some LCOs and RAs apply only during Core Alterations. The equivalent ITS definition of a Core Alteration also identifies activities classified as Core Alterations, but also says that RAs to suspend core alterations do not preclude completion of movement of a component to a safe position. This is an equivalent administrative because it is a reasonable interpretation of the existing definition change with no adverse effect on safety.	Table 1.1-1	1.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
A11	The CTS definition of "Operable" says that operability must be verified by testing at the frequency required by the Technical Specifications (TS). The equivalent ITS definition for "operable-operability" does not specify that operability must be verified by testing at a specified frequency. However, this CTS requirement is found in ITS SR 3.0.3. Thus, this is an equivalent administrative change with no effect on safety.	SR 3.0.3	1.5
A12	Not used.		
A13	Not used.		
A14	Not used.		
A15	Not used.		
A16	Not used.		
A17	CTS include abbreviations for Surveillance Requirement (SR) Frequencies. ITS SRs do not use these abbreviations . Therefore, the list of abbreviations is not needed. This is an equivalent administrative change with no effect on safety.	1.0	Table 4.1-1

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ITS SECTION 2.0 - SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	2.0	2.0
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	2.0	2.0
A3	CTS set a safety limit that the combination of thermal power, coolant pressure, and coolant temperature must not exceed the limits for four-loop operation. ITS keep the same safety limit , but are more specific than CTS in that the safety limits are based on pressurizer pressure and vessel inlet temperature. This is an equivalent administrative change.	Figure 2.1-1 2.1.1	2.1 Figure 2.1-1
A4	CTS have a safety limit based on thermal power, coolant pressure, and coolant temperature. CTS include two clarifications for these limits: 1) limits apply for four-loop operation; and, 2) the limit is exceeded if the point defined by the combination of RCS vessel inlet temperature and power level is above the appropriate pressure line. ITS keep the same limit, but the clarifications are not necessary because ITS LCO 3.4.4 requires 4 loops in operation in Modes 1 and 2 and ITS Figure 2.1.1-1 is marked clearly to show acceptable and unacceptable regions of operation. Thus, this is an equivalent administrative change with no effect on safety because there is no change to existing requirements.	Figure 2.1-1 LCO 3.4.4 2.1.1	2.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS have a SL based on a combination of thermal power, coolant pressure, and coolant temperature, but no explicit applicability statement. ITS keep the same safety limit, but also specify that this safety limit is applicable in Modes 1 and 2. this is an equivalent administrative change.	Figure 2.1.1-1 2.1.1	2.1
A6	CTS have a SL for the maximum RCS pressure that is applicable whenever fuel assemblies are installed in the reactor vessel. ITS keep the same SL, but also specify that this SL applies in Modes 1, 2, 3, 4, and 5, and in Mode 6 when the reactor vessel head is on. This is an equivalent administrative change.	2.1.1 2.1.2	2.1

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ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.0	3.0
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.0	3.0
A3	This change adds an ITS LCO to provide an explicit statement to clarify that each of the ITS LCOs must be met during the Modes or other specified conditions in that LCO's Applicability. Although CTS have no explicit equivalent requirement, this change is consistent with current practice, and is therefore administrative.	LCO 3.0.1	None
A4	CTS say that the plant is operating in a degraded mode when one or more systems are inoperable. CTS imply that Actions are required when operating in a degraded mode, but the defined term "Operation in a Degraded Mode" is not used in any CTS. ITS state explicitly that if a failure to meet any LCO is discovered, then the associated Required Actions (RAs) must be met. ITS also clarify that if the LCO is met, or no longer applies, prior to expiration of the specified Completion Time, completion of the RA is not required unless otherwise stated. This is an equivalent administrative change.	LCO 3.0.3	1.13

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	ITS specify that if an LCO is met or no longer applies prior to expiration of the specified Completion Time, completion of the RA is not required unless otherwise stated. ITS extend the provisions of CTS to apply to any Actions and not just to those Actions requiring plant shutdown. This is an equivalent administrative change.	LCO 3.0.3 LCO 3.0.2	1.13
A6	ITS state explicitly that the plant must be placed in cold shutdown when Actions are not specified or specified Actions are not met. In addition, ITS specify that shutdown must be initiated within 1 hour and completed within 37 hours of the discovery of the condition. This is an equivalent administrative change.	LCO 3.0.3	None
A7	CTS specify that for the cases where no exception time is specified for inoperable components, this time is assumed to be zero. This requirement is not necessary in ITS because ITS LCOs include allowable out of service times (AOTs) and Completion Times for all identified conditions; otherwise, ITS LCO 3.0.3 applies. This is an equivalent administrative change.	LCO 3.0.3	3.0
A8	ITS have an exception to ITS LCO 3.0.2 for support systems that have an LCO specified in the TS. This exception is needed because LCO 3.0.2 would require the Conditions and RAs of an inoperable supported system be entered solely due to the support system's inoperability. This is an equivalent administrative change.	LCO 3.0.6 LCO 3.0.2	None
A9	ITS give guidance for meeting the test exception ITS LCO 3.1.8. This exception allows specified TS requirements to be changed to permit special tests or operations that otherwise could not be done. LCO 3.0.7 eliminates the confusion about which LCOs apply during the performance of a special test or operation. This is an equivalent administrative change.	LCO 3.0.7 LCO 3.1.8	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>CTS do not require surveillance if plant condition is the same as that into which it would be placed by an unsatisfactory result. ITS keep this requirement by saying that SRs must be met during conditions in the Applicability for individual LCOs. Failure to meet a Surveillance, during or between performances, is failure to meet the LCO. Failure to do a surveillance within frequency is failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be done on inoperable equipment or variables outside specified limits. This is an equivalent administrative change.</p>	<p>SR 3.0.1 SR 3.0.3</p>	<p>4.1 1.12</p>
A11	<p>CTS say that failure to perform a SR within the allowed interval, constitutes noncompliance with LCO operability requirements, and that each SR must be done within the interval with a maximum 25% extension. ITS keep this requirement, but clarify that this allowance applies also to the RAs with Completion Times that require periodic performance except that the initial performance must be performed within the specified Completion Time. This is an equivalent administrative change.</p>	<p>SR 3.0.2</p>	<p>4.1 1.12</p>

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ITS SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.1	3.10.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. These changes have no adverse effect on safety.	3.1.1	3.10
A3	This change adds completion time to initiate boration if shutdown margin requirement is not met. This is an equivalent administrative change because the ITS requirement is consistent with a reasonable interpretation of the current requirement and it still ensures that appropriate action is pursued promptly in a controlled way.	3.1.1 RA A.1	3.10.1.2 3.10.1.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.2 - CORE REACTIVITY			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.2	3.10.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.1.2	3.10
A3	This change clarifies that the core reactivity surveillance performed after each refueling is to be performed before entering Mode 1. This is an administrative change because it is consistent with the existing CTS requirements and current practice.	SR 3.1.2.1 3.1.2 BASES	3.10.10
A4	This change adds Notes to the core reactivity surveillance to clarify that the first monthly check is not required until after 60 EFFD and to clarify that normalization between measured and predicted reactivity is optional. This is an administrative change because it is consistent with the existing CTS intent and current practice.	SR 3.1.2.1 NOTE	3.10.10

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.3	3.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.1.3	3.1
A3	This change adds a specific value for moderator temperature coefficient upper limit $\leq 0.0 \Delta k/k$ °F at hot zero power. This is an equivalent administrative change because there is no change to the existing CTS requirement.	LCO 3.1.3	3.1.C.1
ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.4	3.10

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	LCO 3.1.5 3.1.4	3.10.4.1
A3	This change establishes consistent terminology regarding characteristics of an operable control rod and control rod alignment limits. This is an equivalent administrative change.	3.1.4	3.10.5 3.10.7 3.10.8
A4	This change revises the applicability statement to encompass approach to criticality and to reflect ITS Mode definitions. This is an equivalent administrative change.	3.1.4	3.10.7
A5	This change specifies a completion time for the required action. This is an equivalent administrative change.	3.1.4	3.10.7
A6	This change modifies the CTS statement regarding additional restrictions on rod insertion limits to reflect the intent that shutdown margin requirements must be satisfied more clearly. This is an equivalent administrative change.	3.1.4	3.10.4.3
A7	This change expands the CTS statement regarding peaking factor to specify clearly that the ITS surveillances refer to "Heat Flux Hot Channel Factor" and "Nuclear Enthalpy Rise Hot Channel Factor." This is an equivalent administrative change.	3.1.4	3.10.5 3.10.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	This change reflects that a CTS allowance involving a compensatory action for a misaligned rod is not needed because two separate ITS LCOs state the requirements and RAs for rod group alignment limits and quadrant power tilt ratio more clearly. This is an equivalent administrative change.	3.1.4 3.2.4	3.10.5 3.10.3
A9	This change clarifies that the CTS surveillance frequency for rod alignment means a specific time interval . This is an equivalent administrative change.	3.1.4	3.10.3 3.10.5 Table 4.1-1
A10	This change reflects that the CTS requirement that rod position indicator reading be “logged” is not needed since the method for documenting the results of TS required surveillances is governed by administrative controls. This is an equivalent administrative change.	3.1.4	3.10.3
A11	This change modifies the surveillance requirement to verify rod movement in either direction. ITS excludes any rods that are already fully inserted in the core because the intent of the surveillance is already satisfied for those rods. This is an equivalent administrative change.	3.1.4	Table 4.1-4
A12	This change reflects that the CTS exception regarding rod misalignment during physics testing is not needed in ITS 3.1.4 because the required allowance is provided in ITS 3.1.8. This is an equivalent administrative change.	3.1.4 3.1.8	3.10.7
A13	This change revises surveillance description to define the plant conditions required for performing rod drop testing more precisely. This is an equivalent administrative change.	3.1.4	3.10.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A14	This change rewords CTS rod position surveillance to place the allowance of a “one hour thermal soak after rod motion” in a Note format in ITS. This is an equivalent administrative change.	3.1.4	3.10.5
A15	This change arranges CTS graph and table into a new table format in ITS to improve clarity of information. This is an equivalent administrative change.	Table 3.1.4-1	Figure 3.10-1
ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.5	3.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.1.5	3.10
A3	This change clarifies that each shutdown bank be within insertion limits as opposed to fully withdrawn as specified in the COLR. This is an equivalent administrative change because the COLR specifies that the shutdown bank position for criticality is fully withdrawn.	LCO 3.1.5	3.10.4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	This change modifies applicability for shutdown bank insertion limits to adopt STS definition of transition between Mode 2 and Mode 3. This is an equivalent administrative change.	LCO 3.1.5 LCO 3.1.1	3.10.4.1 3.10.1 1.2.3 1.2.2
ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.6	3.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.1.6	3.10
A3	This change clarifies that control bank insertion limits include insertion, sequence, and overlap limits as specified in the COLR. This is an equivalent administrative change.	LCO 3.1.6	3.10.4.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS guidance regarding conditions that could invalidate control bank insertion limits does not need to be stated in ITS LCO 3.1.6. These conditions are addressed adequately by ITS LCOs 3.1.4 and 3.1.5. This is an equivalent administrative change.</p>	<p>LCO 3.1.4, RA A.1.1</p> <p>LCO 3.1.4, RA A.1.2</p> <p>LCO 3.1.4, RA B.2.1.1</p> <p>LCO 3.1.4, RA B.2.1.2</p> <p>LCO 3.1.4, RA D.1.1</p> <p>LCO 3.1.4, RA D.1.2</p> <p>LCO 3.1.5</p>	<p>3.10.4.3</p> <p>3.10.7.1</p>
ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION			
A1	<p>Revised numbering and reformatting in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431 and adopted certain plant specific wording preferences or conventions. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis.</p>	3.1.7	3.10.9
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.</p>	3.1.7	3.10.9

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	This change modifies the method of presenting information while maintaining same requirement regarding limits on rod position indicator inoperability. This is an equivalent administrative change.	LCO 3.1.7 LCO 3.0.3	3.10.6.2
A4	This change reflects that actions for a misaligned rod are not directly applicable as a response to rod position indicator channel out of service (OOS). This is an equivalent administrative change.	LCO 3.1.4 LCO 3.1.7 LCO 3.0.6	3.10.6.3 3.10.5
A5	This change adds a Note to clarify that separate condition entry is allowed for each inoperable rod position indicator per group and each demand position indicator per bank. This is an equivalent administrative change.	1.3 LCO 3.1.7, NOTE	3.10.9
A6	Condition D is added to state the mode requirement explicitly if required actions and completion times are not met. There is no change to existing requirements. This is an equivalent administrative change.	LCO 3.1.7, CONDITION D	3.10.6 3.10.5.1
A7	This change is an expanded surveillance statement to explain that comparison between rod position indicator and group demand position is required. This is a more explicit statement of an existing requirement. This is an equivalent administrative change.	SR 3.1.7.1	TABLE 4.1-1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.1.8	3.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.1.8	3.10
A3	This change specifies a completion time for required action in response to shutdown margin not within limit. The new requirements are consistent with a reasonable interpretation of the existing requirements and ensure that the appropriate action is pursued without delay and in a controlled manner. Therefore, this is an equivalent administrative change.	3.1.8 RA A.1	3.10.1.1 3.10.1.2 3.0
A4	This change eliminates exceptions to power distribution limits during physics tests because these tests are performed in Mode 2 and the power distribution limits apply to Mode 1. This is an equivalent administrative change.	LCO 3.1.8 LCO 3.2.1 LCO 3.2.2 LCO 3.2.3 LCO 3.2.4	3.10.2.1 3.10.3.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	Disabling of one nuclear flux power range trip channel is allowed by ITS LCO 3.3.1 to support core physics testing. This is an equivalent administrative change.	LCO 3.3.1	TABLE 3.5-2, ITEM 2

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ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.2.1	3.10.2
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. These changes have no adverse effect on safety.	3.2.1	3.10.2
A3	The CTS specify that $F_Q(Z)$ is applicable "at all times." In ITS, $F_Q(Z)$ is applicable in Mode 1. CTS allows unlimited operation for physics testing when $F_Q(Z)$ limits are not met and physics testing is performed in Mode 2 only. Therefore, the effective CTS applicability for $F_Q(Z)$ is Mode 1. This is an equivalent administrative change.	3.2.1	3.10.2.1
A4	CTS specify that $F_Q(Z)$ is not required to be met "during low power physics tests." ITS does not state this exception because the limits on power distribution apply only in Mode 1 and related physics testing is performed in Mode 2. This is an administrative change because it is consistent with the existing CTS intent and current practice.	3.2.1	3.10.2.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS SR includes "following 'initial' core loading" as one of the required frequencies for verifying $F_Q(Z)$ limits are met. The equivalent ITS SR does not specify this as a required frequency because initial fuel loading was a one-time event that has been completed. Therefore, this is an equivalent administrative change.	SR 3.2.1.1	3.10.2.2
A6	CTS specify Actions if limits for either $F_Q(Z)$ or $F_{\Delta H}^N$ are exceeded. ITS separates this into two limits, and there are no changes to the existing requirements. Therefore, this is an equivalent administrative change.	3.2.1 3.2.2	3.10.2.2.2
A7	CTS and ITS require a proportional reduction in reactor power and high flux trip setpoints if limits for $F_Q(Z)$ are not met. The ITS includes explicit provisions for returning to full power to establish appropriate conditions. ITS maintains these requirements and specifies that these reductions may be restored after satisfactory performance of a surveillance. This is an equivalent administrative change.	3.2.1 SR 3.2.1.1	3.10.2.2.2
A8	CTS specify Actions if $F_Q(Z)$ limits are not met; however, no Actions are specified if these Actions are not completed. Under the same conditions, ITS establishes an explicit requirement that the reactor be in Mode 2 (outside the LCO Applicability) within 6 hours. This is an equivalent administrative change because it is consistent with the existing CTS intent and current practice.	3.2.1	3.10.2.2.2
A9	Both CTS and ITS require reactor shutdown if $F_Q(Z)$ limits are not met. Both CTS and ITS allow continued reactor operation for physics testing when $F_Q(Z)$ limits are not met, except that ITS explicitly limits this physics testing to Mode 2. This is an equivalent administrative change because it is consistent with the existing CTS intent and current practice.	3.2.1	3.10.2.2.2
A10	Moved to LA Table		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^H$)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.2.2	3.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.2.2	3.10
A3	The CTS specify that $F_{\Delta H}^N$ is applicable "at all times." In ITS, $F_{\Delta H}^N$ is applicable in Mode 1. CTS allows unlimited operation for physics testing with $F_{\Delta H}^N$ limits not met and physics testing is performed in Mode 2 only. The implied CTS applicability for $F_{\Delta H}^N$ is Mode 1. This is an equivalent administrative change.	3.2.2	3.10.2.1 3.10.2.2
A4	CTS specifies that $F_{\Delta H}^N$ is not required to be met "during low power physics tests," which are performed in Mode 2. ITS does not state this exception because the limits on power distribution are applicable only in Mode 1. This is an equivalent administrative change because it is consistent with existing CTS intent and current practice.	3.2.2	3.10.2.1
A5	CTS 3.10.2.2 includes "following initial core loading" as one of the required SR Frequencies for verifying $F_{\Delta H}^N$ limits are met. ITS does not specify this as a required frequency because initial fuel loading was a one-time event that has been completed. This is an equivalent administrative change.	SR 3.2.2.1	3.10.2.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	CTS specify Actions if limits for either $F_{\alpha}(Z)$ or $F_{\Delta H}^N$ are exceeded. ITS separates this into two limits, and there are no changes to the existing requirements. This is an equivalent administrative change.	3.2.2	3.10.2.2.2
A7	Moved to LA Table		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.2.3	3.10.2
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.2.3	3.10.2
A3	CTS specify that if the indicated axial flux difference deviates from its target band, then either the deviation shall be eliminated immediately; or, reactor power shall be reduced to < 90% RTP. The equivalent ITS provide an explicit limit of 15 minutes for attempts to restore AFD to within limits and an explicit Completion Time of an additional 15 minutes to reduce power to < 90% RTP if restoration is not successful. The 15 minute CT involves essentially immediate action to restore, and is consistent with current practice and the intent of the CTS, and is therefore an administrative change.	3.2.3	3.10.2.5.1
A4	CTS specify requirements for AFD when thermal power is > 90% RTP, < 90% RTP, and < 50% RTP. ITS 3.2.3 LCO parts a, b, and c, and associated Notes, eliminate potential ambiguity rules for accumulation of penalty time when at the same power levels. This is an equivalent administrative change retaining the requirements and intent of the CTS.	3.2.3	3.10.2.5 3.10.2.6 3.10.2.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS specify that the indicated AFD of all but one operable excore channel shall be maintained within the band specified in the COLR except as modified by other CTS requirements for AFD when thermal power is > 90% RTP, < 90% RTP, and < 50% RTP. The ITS and associated Notes eliminate the need for internal cross references. This is an equivalent administrative change that retains the requirements and intent of the CTS.	3.2.3	3.10.2.4 3.10.2.5 3.10.2.6 3.10.2.7 COLR
A6	CTS specify that a 2-hour deviation from AFD requirements is permissible during tests performed as part of the augmented startup program. ITS does not include this exception because this allowance applied to a one-time-only event and is no longer required. This is an equivalent administrative change.	3.2.3	3.10.2.6.1 3.10.2.7.2
A7	CTS specify Actions if AFD limits are not met when thermal power is < 90% RTP. No Completion Time is specified, so the action must be initiated immediately. The equivalent ITS keeps these RAs and has a Completion Time to initiate action. This is an equivalent administrative change.	3.2.3	3.10.2.6.1 3.10.2.6.2
A8	CTS specify Actions when thermal power is < 90% RTP and AFD limits are not met. No direction is provided if AFD is restored to the target band before the Action is completed. The equivalent ITS keeps the required Action, but the Note to Condition C clarifies that the LCO is met as soon as AFD is restored to the target band. This is an equivalent administrative change that retains the intent of the CTS.	3.2.3	3.10.2.6.1 3.10.2.6.2
A9	CTS 3.10.2.6.3 specifies that a power increase to > 90% RTP is contingent upon the indicated AFD being within the target band. This statement is not needed in ITS because it is a restatement of the LCO which must be met prior to exiting a condition's required actions. This is an equivalent administrative change.	3.2.3	3.10.2.6.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>CTS specify that power shall be limited to 90% RTP if calibration requirements for the excore axial offset detection system, identified in Table 4.1-1, are not met. CTS require monthly calibrations of upper and lower power range detector chambers for axial offset. ITS 3.3.1, (RTS) Instrumentation, establishes requirements, including calibration, for the operability of the power range detectors. This is an equivalent administrative change that retains the requirements and intent of the CTS.</p>	<p>3.2.3 3.3.1</p>	<p>3.11.B Table 4.1-1</p>
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	3.2.4	3.10.3
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.</p>	3.2.4	3.10.3
A3	<p>CTS specify that if QPTR limits are not met, then operation is permitted up to 50% for an indefinite period while performing corrective action. This is an implied applicability that no QPTR requirements exist below 50% RTP. ITS LCO specifies that QPTR limits are Applicable in Mode 1 with thermal power > 50% RTP. This is an equivalent administrative change.</p>	3.2.4	3.10.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	CTS specify that the QPTR limit is not required to be met during physics tests. ITS do not state this exception because the QPTR limits are applicable only in Mode 1 when thermal power is greater than 50% RTP and physics test exceptions are permitted in Mode 2 only. This is an equivalent administrative change.	3.2.4	3.10.3.1
A5	CTS specify that if QPTR limits are not met, then the tilt condition must be eliminated or the specified Actions started. ITS specify the actions required within 2 hours if a tilt condition exists; however, ITS does not include an explicit statement that the option exists to restore compliance with the LCO within the Completion Time of the LCO Actions because this is generally true for all ITS LCOs. This is an equivalent administrative change.	3.2.4	3.10.3.1
A6	CTS specify actions if QPTR exceeds 1.09 with a concurrent misaligned rod. ITS retains these requirements for improperly positioned control rods in the applicable ITS sections. This is an equivalent administrative change that retains the CTS intent and requirements.	3.2.4 3.1.4 3.1.6	3.10.3.2
A7	CTS specify that Actions for QPTR exceeding 1.09 need not be met during "physics tests." ITS does not state this exception because QPTR limits are applicable only in Mode 1 with thermal power > 50% RTP and physics tests exceptions are permitted in Mode 2 only. This is an equivalent administrative change.	3.2.4 3.1.8	3.10.3.2
A8	Moved to LA3		
A9	CTS specify that when one excore detector is inoperable, then the remaining three (excore) detectors shall be used for computing the average; however, the CTS specify that if one excore detector is inoperable above 75% RTP, then core quadrant power balances shall be determined using movable incore detectors. ITS maintains these requirements. This is an equivalent administrative change.	3.2.4.1 SR 3.2.4.2	1.11 3.10.2.9

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>CTS specify that if one excore detector is inoperable when operating above 75% RTP, then QPTR must be determined using incore detectors. ITS allows QPTR to be verified using incore detectors with any number of excore detectors inoperable. This is an equivalent administrative change that retains the intent and requirements of the CTS.</p>	<p>3.2.4 SR 3.2.4.2</p>	<p>3.10.2.9</p>
A11	<p>CTS require a power reduction to $\leq 50\%$ RTP if QPTR limits are not met within 24 hours for testing and evaluation. ITS require that reactor power be reduced to $\leq 50\%$ RTP if the Required Actions are not completed within the specified Completion Times. This is an equivalent administrative change that retains the intent and requirements of the CTS.</p>	<p>3.2.4</p>	<p>3.10.3.1.b</p>

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3 - INSTRUMENTATION

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.3.1	2.3.1.A, B, C 2.3.2.A, B, C 4.1.A, B
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. These changes have no adverse effect on safety.	3.3.1	3.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>With requirements unmet, CTS for the Manual Reactor Trip function imply Applicability by requiring shutdown. ITS require operability in Modes 1 and 2 and in 3- 5 if the Rod Control System can withdraw rods, or if one or more rods are not inserted fully (more restrictive). CTS require an operable channel, redundancy zero; ITS require two channels (more restrictive) . ITS give 48 hours to restore an inoperable channel. With channel number or redundancy requirements unmet, CTS require shutdown in four hours. ITS LCO 3.3.1 defaults to 3.0.3 putting plant outside Applicable Mode in less time than currently (more restrictive). Both CTS and ITS require testing reactor trip and bypass breakers at 24 months. There is no allowable value or setpoint for this function. Except as noted, these are equivalent administrative changes with no adverse safety effect.</p>	<p>3.3.1 Function 1</p> <p>LCO 3.3.1 RA B.1</p> <p>LCO 3.3.1 RA C.1</p> <p>Table 3.3.1-1 Note a</p> <p>LCO 3.0.3</p> <p>SR 3.3.1.14 Bases</p>	<p>Table 3.5-2 Footnote *</p> <p>Table 4.1-1 Item 39 Remark 2</p> <p>Table 4.1-1 Item 40 Remark 2</p> <p>3.5</p>
A4	<p>ITS modify CTS for the Power Range Neutron Flux-High (trip) function as follows. With requirements unmet, CTS imply Applicability by requiring hot shutdown; ITS require this Function in Modes 1 and 2 and in 3-5 if Rod Control System can withdraw rods or one or more rods are not inserted fully (more restrictive). CTS require one channel and zero redundancy. ITS require two (more restrictive). ITS give 48 hours to restore an inoperable channel. With requirements for operable channels or redundancy unmet, CTS require maintaining or proceeding to hot shutdown in four hours. ITS LCO 3.3.1 defaults to 3.0.3 requiring plant outside Applicable Mode in less time than CTS (more restrictive). CTS and ITS test reactor trip and bypass breakers every 24 months. There is no allowable value or setpoint. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 2.a</p> <p>LCO 3.3.1 RA B.1</p> <p>LCO 3.3.1 RA B.2</p> <p>Table 3.3.1-1 NOTE a</p> <p>SR 3.3.1.14 Action D Note</p>	<p>Table 3.5-2 Footnote *</p> <p>Table 4.1-1 Item 39 Remark 2</p> <p>Table 4.1-1 Item 40 Remark 2</p> <p>2.3.1.B(1) Table 3.5-2 Function2</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>ITS modify CTS for Power Range Neutron Flux Low. CTS and ITS apply in Modes 1 and 2. CTS have three operable channels, two redundant; ITS have four and trip inoperable ones. CTS omit trip completion time (CT), but one hour is reasonable; ITS allow six (less restrictive). With unmet requirements, CTS begin shutdown in four hours, complete in the following four-six; ITS allow six-seven (more restrictive). CTS and ITS have eight-hour channel bypass. CTS channel check shiftly; ITS, each 12 hours. CTS channel test quarterly not < 30 days pre-startup; ITS do COT pre-startup if SR was not done in 92 days (less restrictive). CTS channel test quarterly < P-10; ITS may defer SR four hours. CTS do not calibrate; ITS do (more restrictive). CTS trip setpoint LSSS is $\leq 25\%$ RTP. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.3.1 RA E.1</p> <p>3.3.1 Function 2.b</p> <p>LCO 3.3.1 Condition E RA Note</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.8</p> <p>SR 3.3.1.11</p>	<p>2.3.1.A(1)</p> <p>Table 3.5-2 Function 2</p> <p>Table 3.5-2 Footnote *</p> <p>3.5</p> <p>3.5.4</p> <p>4.1-1 Note **</p>
A6	<p>IRM Neutron Flux trip Applicability is Mode 1 at < P-10, and Mode 2 with possible uncontrolled RCCA bank rod withdrawal accident. At > P-10, the Power Range Neutron Flux-High trip provides core protection for a rod withdrawal accident. In Modes 3 to 5, intermediate trip need not be operable. ITS have one IRM trip channel. ITS end reactivity addition and go outside Applicability if the required channel is inoperable. CTS channel check IRM shiftly; ITS check every 12 hours. CTS do IRM response to simulated signal pre-startup if not done previous week; ITS do COT every 92 days. CTS do not do shutdown COT of IRM Flux trip; ITS do COT in four hours below P-10. CTS do not calibrate IRM Flux trip, but verify in COT. ITS calibrate Intermediate channel each 24 months (more restrictive). CTS have no LSSS for IRM trip; but CTS setpoint equivalent is about 25% RTP. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 3</p> <p>LCO 3.3.1 RA F.1</p> <p>LCO 3.3.1 RA F.2</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.8</p> <p>SR 3.3.1.11</p>	<p>3.5.6</p> <p>Table 4.1-1 Item 2</p> <p>2.3</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>The SRM Flux Function is not a Safety Limit (SL) or LCO in CTS since it backs up the Power Range Neutron Flux Low Trip in analyses. It must be operable in Mode 2 below P-6, and in Modes 3 to 5 if the Rod Control System can withdraw rods, or if any rod is not inserted fully. ITS require one channel of this function. If this function is inoperable, ITS require opening RTBs immediately. CTS require channel check shiftily; ITS do it every 12 hours. If not done the previous week, CTS require SRM response to simulated signal before startup. ITS extend COT frequency to 92 days. CTS do not require a COT during shutdown. CTS do not have an allowable value though CTS Bases indicate setpoint is about 1.0 E+5 cps. ITS identify TS Allowable Value as NA. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 4</p> <p>LCO 3.3.1 RA G.1</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.7</p> <p>SR 3.3.1.8</p> <p>SR 3.3.1.11</p> <p>Table 3.3.1-1</p>	<p>2.3</p> <p>Table 4.1-1 Item 3</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	<p>The ITS modify Overtemperature ΔT CTS. Both have Mode 1 and 2 Applicability. CTS omit Completion Times for inoperable channels; ITS allow six hours. With requirements unmet, CTS begin shutdown in four hours, ending in the following four to six; ITS give six or seven (more restrictive). CTS channel check shiftly; ITS, each 12 hours. CTS channel test quarterly; ITS have 92-day COT. CTS calibrate two inputs every 24 months; CTS omit 24-month Power Range calibration, but verify setpoints in quarterly operational test; ITS calibrate. CTS Table 4.1-1, Item 1, Note * and Remarks go in ITS Bases. CTS and ITS base ΔT on calculation. These changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 5</p> <p>LCO 3.3.1 Condition E RA Note 1</p> <p>LCO 3.3.1 RA E.1</p> <p>LCO RA E.2</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.3 Note 1</p> <p>SR 3.3.1.3 Note 2</p> <p>SR 3.3.1.7</p>	<p>2.3.1.B(4)</p> <p>3.5</p> <p>Table 3.5-2 Function 3</p> <p>3.5.4</p> <p>3.11.B</p> <p>Table 4.1-1 Item 1</p> <p>Table 4.1-1 Item 1 Remark 3 Note *</p> <p>Table 4.1-1 Item 1 Remark 4</p> <p>Table 4.1-1 Item 4</p> <p>Table 4.1-1 Item 7</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A9	<p>ITS modify Overpower ΔT CTS. With requirements unmet, CTS imply Mode 1 and 2 Applicability by requiring shutdown; ITS require the Function. Channel changes are same as Overtemperature ΔT changes. RA and CT for Overpower ΔT changes are the same as Overtemperature ΔT. CTS channel check Overpower ΔT inputs shiftily; ITS check at 12 hours. CTS channel test quarterly; ITS do 92-day COT. CTS calibrate RCS Temperature input to Overpower ΔT at 24 months. Unlike ITS, CTS omit Power Range Neutron Flux High 24-month calibration. CTS Table 4.1-1, Item 1, Note * information, and Remarks go to ITS Bases. CTS base the trip setpoint LSSS for Overpower ΔT on calculation with various inputs. With some differences, ITS use same inputs, equation, and constants. Changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 3</p> <p>3.3.1 Function 6</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.7</p> <p>SR 3.3.1.12</p>	<p>2.3.1.B(5)</p> <p>3.5</p> <p>Table 3.5-2 Function 3</p> <p>Table 3.5-2 Function 4</p> <p>Table 4.1-1 Item 1</p> <p>Table 4.1-1 Item 1 Note *</p> <p>Table 4.1-1 Item 1 Remark 4</p> <p>Table 4.1-1 Item 4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>CTS unblock this Function at Power Range Nuclear Flux \geq 10% rated power or turbine first stage pressure \geq 10% equivalent full load. Above P-7, ITS require this Function in Mode 1. CTS require three operable channels, and redundancy of two; ITS require four channels, inoperable channels in trip. CTS trip inoperable channels. No CT is given, but one hour is reasonable. ITS allow six (less restrictive). With requirements unmet, CTS begin shutdown in four hours, complete in the following four to six. ITS give six or seven to reduce power < P-7 (more restrictive). CTS channel check shiftly; ITS have 12-hour check. CTS channel test quarterly; ITS do 92-day COT. CTS trip setpoint LSSS for Pressurizer Pressure-Low is \geq1800 psig; ITS allowable value is \geq 1790 psig. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 7.a LCO 3.3.1 LCO 3.3.1 Condition H RA Note LCO 3.3.1 RA H.1 LCO 3.3.1 RA H.2 LCO 3.0.3 SR 3.3.1.7 SR 3.3.1.10</p>	<p>2.3.2.A 2.3.1.B(3) Table 3.5-2 Function 5 Table 3.5-2 Footnote * Table 4.1-1 Item 7 3.5-4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A11	<p>ITS modify CTS for Pressurizer Pressure High. In Modes 1 and 2, ITS have operability; CTS imply Applicability. CTS say two operable channels, one redundancy, i.e., three channels, maximum one in trip and implication that inoperable channels be in trip. ITS say three channels, inoperable ones in trip. CTS meet requirements by inoperable channels in trip. No CT is given, but an hour is reasonable; ITS allow six hours (less restrictive). With requirements unmet, CTS start shutdown in four hours, complete it in the following four to six; ITS have six or seven to be in Mode 3 (more restrictive). Changes to SRs in CTS Table 4.1-1, Item 7 for ITS 3.3.1, Function 7.b are same as for 7.a. CTS setpoint LSSS is ≤ 2385 psig; ITS allowable value is ≤ 2400 psig. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.0.3</p> <p>LCO 3.1.1 RA E.1</p> <p>3.3.1 Function 7.b</p> <p>3.3.1 Condition E RA Note</p> <p>LCO 3.3.1 RA E.1</p> <p>LCO 3.3.1 RA E.2</p>	<p>2.3.1.B.(2)</p> <p>3.5</p> <p>Table 3.5-2 Function 6</p> <p>Table 3.5-2 Footnote *</p> <p>3.5.4</p> <p>Table 4.1-1 Item 7</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A12	<p>ITS modify the Pressurizer Water Level-High Function. CTS unblock this Function when power range nuclear flux \geq 10% rated power, or when turbine first stage pressure \geq 10% equivalent full load. Thus, Function is unblocked automatically above P-7. ITS have operability in Mode 1 above P-7. CTS require two operable channels with redundancy one. This means three channels, maximum one in trip, inoperable channels in trip. ITS require three channels, inoperable ones in trip. CTS channel check shiftily; ITS do it at 12 hours. CTS channel test quarterly; ITS do COT at 92 days. CTS and ITS calibrate at 24 months. CTS trip setpoint LSSS for Pressurizer-Hi Water Level is \leq 92% span. ITS allowable value is 97% span. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1</p> <p>3.3.1 Function 7</p> <p>3.3.1 Function 8</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.7</p> <p>SR 3.3.1.10</p>	<p>2.3.1.C(1)</p> <p>2.3.2.A</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Function 5</p> <p>Table 3.5-2 Function 7</p> <p>Table 4.1-1 Item 6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A13	<p>ITS modify Reactor Coolant Flow Low One Loop CTS. CTS Table 3.5-2, Function 8(a) is operable at > 50% RTP. Applicability and bypass for trip on loss of flow in one loop at < 50% RTP stay. CTS have two operable channels per loop with a redundancy one; i.e., three channels per loop, maximum one in trip, inoperable ones in trip. ITS have three channels per loop, inoperable ones in trip. With requirements unmet, CTS begin hot shutdown in four hours, completing it in the following four to six; ITS have six or seven (more restrictive). CTS do shiftly channel check; ITS do it at 12 hours. CTS do channel test quarterly; ITS do COT at 92 days. CTS and ITS calibrate every 24 months. CTS allowable value is $\geq 90\%$ normal indicated loop flow. ITS allowable value is $\geq 90\%$. Except as noted, changes are equivalent administrative with no adverse safety effect .</p>	<p>3.3.1 Function 9</p> <p>3.3.1 Function 9 RA H.1</p> <p>3.3.1 Function 17.C</p> <p>Table 3.3.1-1 Note (e)</p> <p>LCO 3.3.1 Condition H RA Note</p> <p>LCO 3.0.3</p> <p>SR 3.3.1.7</p> <p>SE 3.3.1.10</p>	<p>2.3.1.B.6.a</p> <p>2.3.2.B</p> <p>Table 3.5-2 Function 8</p> <p>Table 3.5-2 Function 8(a)</p> <p>Table 3.5-2 Function 8(b)</p> <p>Table 3.5-2 Function 9</p> <p>Table 3.5-2 Footnote *</p> <p>Table 4.1-1 Item 5</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A14	<p>ITS 3.3.1, Function 9 replaces CTS Table 3.5-2, Functions 8(a) and (b). The ITS have one Reactor Coolant Flow-Low trip, and it is modified by conditions. Trip occurs on loss of flow in one loop if \geq P-8; it does not occur until loss of flow in two loops if $<$ P-8; and, it does not occur on loss of flow if $<$ P-10. ITS modify Reactor Coolant Flow Low Two Loop CTS: a. CTS unblock function when power range nuclear flux \geq 10% rated power or when turbine first stage pressure \geq 10% equivalent full load. ITS have this Function in Mode 1, and Note (e) specifies this function is needed only $>$P-7. ITS keep bypass when $<$ 50% RTP (See ITS 3.3.1, DOC A.28). b. (See ITS 3.3.1, DOC A.13.b) c. (See ITS 3.3.1, DOC A.13.c) d. (See ITS 3.3.1, DOC A.13.d) e. (See ITS 3.3.1, DOC A.13.e) Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Note e</p> <p>3.3.1 Function 9</p> <p>3.3.1 Function 17.c</p>	<p>2.3.2,A</p> <p>Table 3.5-2 Function 8(a)</p> <p>Table 3.5-2 Function 8(b)</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A15	<p>ITS 3.3.1, Function 10.a (RCP Breaker Position-Single Loop) is based on CTS 2.3.1.B.6(b) and Table 3.5-2, Item 11 >P-8. CTS bypass this Function at $\leq 50\%$ rated power. Above P-8, ITS have Mode 1. CTS have three operable channels with a redundancy of two, i.e., four channels, inoperable ones restored. ITS have one operable channel per RCP and restore inoperable ones in six hours. CTS meet requirements by tripping or restoring inoperable channels. No CT is given, but one hour is reasonable; ITS restore inoperable channels in six hours (less restrictive). With requirements unmet, CTS start shutdown in four hours, completing it in the following four-six. ITS give six or seven hours to be in Mode 3 (more restrictive). CTS calibrate each 24 months; ITS do 24-month TADOT, and modify TADOT definition. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 10.a</p> <p>3.3.1 Function 10.b</p> <p>LCO 3.3.1 Condition D RAs Note</p> <p>LCO 3.3.1 RA I.1</p> <p>LCO 3.3.1 RA I.2</p> <p>SR 2.2.1.13</p> <p>SR 3.3.1.14 Note</p>	<p>2.3.1.B.6(b)</p> <p>2.3.2.B</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>3.5-4</p> <p>Table 4.1-1 Item 8</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A16	<p>ITS 3.3.1, (RCP Breaker Position-Two Loops) modify CTS as follows. CTS allow this Function bypassed when at $\leq 10\%$ rated power. ITS require this Function operable in Mode 1 and say that it is required above P-7 and is not required above P-8. Changes to requirements for minimum operable channels are in DOC 15.b. CTS specify that requirements for channels and redundancy be met by placing inoperable channels in trip. No CT is specified, but one hour is reasonable; ITS allow six (less restrictive). With requirements unmet, CTS begin shutdown in four hours and complete it in the following four to six. ITS allow six or seven to reduce power $< P-7$ (more restrictive). CTS and ITS have an eight-hour channel bypass. Changes to SRs are in DOC A.15. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 10.b</p> <p>3.3.1 Function 10.b Note g</p> <p>LCO 3.3.1 RA H.1</p> <p>LCO 3.3.1 RA H.2</p> <p>LCO 3.3.1 Condition H RA Note</p>	<p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>Table 3.5-2 Footnote *</p> <p>3.5.4</p> <p>2.3.1.B.6(b)</p> <p>2.3.2.A</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A17	<p>The ITS modify Undervoltage RCP: CTS may bypass at $\leq 10\%$ rated power; ITS require function in Mode 1 above P-7. CTS say three operable channels, two redundancy, i.e., four channels, inoperable ones in trip. ITS require one per bus, inoperable ones in trip. CTS have no CT to trip inoperable channels, but one hour is reasonable; ITS allow six (less restrictive). With unmet requirements, CTS begin shutdown in four hours, complete it in the following four to six; ITS allow six or seven to reduce power $< P-7$ (more restrictive). CTS channel test quarterly; ITS do 92-day TADOT. ITS take exception to TADOT definition. CTS trip LSSS for Undervoltage 6.9 kV Bus is $\geq 70\%$ normal voltage; ITS allowable value is 'NA'. Except as noted, these changes are equivalent administrative with no adverse effect on safety.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 11</p> <p>LCO 3.3.1 RA H.1</p> <p>LCO 3.3.1 RA H.2</p> <p>LCO 3.3.1 Condition H RA Note</p> <p>LCO 3.3.1 Note e</p> <p>SR 3.3.1.9</p> <p>SR 3.3.1.10</p>	<p>2.3.1.B(7)</p> <p>2.3.2.A</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Function 10</p> <p>Table 3.5-2 Item 8</p> <p>3.5.4</p> <p>Table 4.1-1 Item 8</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A18	<p>ITS modify CTS for Underfrequency RCPs. CTS have bypass at $\leq 10\%$ rated power; ITS have the Function in Mode 1 when $> P-7$. CTS have three operable channels and a redundancy of two; i.e., four channels, inoperable ones in trip. ITS have one operable channel per bus, inoperable ones in trip. CTS have no CT for inoperable channels in trip, but one hour is reasonable; ITS say six hours (less restrictive). With requirements unmet, CTS begin shutdown in four hours, complete in the following four to six. ITS say six or seven hours to reduce power $< P-7$ (more restrictive). CTS channel test quarterly; ITS do 92-day TADOT. ITS qualify TADOT definition. CTS trip setpoint LSSS for Underfrequency 6.9 kV Bus is > 57.2 cps. ITS allowable value is ≥ 57.22 Hertz. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 12</p> <p>LCO 3.0.3</p> <p>3.3.1 Function 12</p> <p>LCO 3.3.1 RA H.1</p> <p>LCO 3.3.1 RA H.2</p> <p>LCO 3.3.1 Condition H RAs Note</p> <p>SR 3.3.1.9 Note</p> <p>SR 3.3.1.10</p>	<p>2.3.1.B.6.b</p> <p>2.3.2.A</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Item 8</p> <p>Table 3.5-2 Item 11</p> <p>3.5.4</p> <p>Table 4.1-1 Item 8</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A19	<p>ITS modify CTS for SG Water Level Low Low. With requirements unmet in Modes 1 and 2, CTS imply Applicability, and ITS require operability. CTS require two channels / loop, one channel / loop redundancy; i.e., three channels / loop, maximum one / loop in trip, inoperable ones in trip. ITS have three / SG, inoperable ones in trip. CTS give no CT for inoperable ones in trip, but one hour is reasonable; ITS allow six hours (less restrictive). With requirements unmet, CTS begin shutdown in four hours, ending in the following four-six. ITS say six or seven for Mode 3 (more restrictive). CTS channel check shiftily; ITS say 12 hours. CTS channel test quarterly; ITS do 92-day COT. CTS setpoint LSSS is $\geq 5\%$ narrow range span; ITS allowable value is $\geq 4.0\%$. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3 3.3.1 Function 13 LCO 3.3.1 RA E.1 LCO 3.3.1 RA E.2 LCO 3.3.1 Condition E RAs Note SR 3.3.1.1 SR 3.3.1.7</p>	<p>2.3.1.C(2) 3.5 Table 3.5-2 Function 9 Table 3.5-2 Footnote * 3.5.4 Table 4.1-1 Item 10</p>
A20	<p>ITS Table 3.3.1-1 is organized to identify applicability, required channels, condition, and surveillance requirements for Function 14, 'S/G Water Level-Low coincident with steam flow/feedwater flow mismatch.' Organizing this information in the ITS Table is an administrative change. The addition of this requirement to ITS is a more restrictive change (see 3.3.1 DOC M9).</p>	<p>LCO 3.3.1 Function 14 LCO 3.3.1 Condition E</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A21	<p>ITS 3.3.1 Function 15 is based on CTS 2.3.1.C(3) and Table 3.5-2, Function 12. The ITS modify CTS for Turbine Trip-Low Fluid Oil Pressure. CTS Applicability is at $\geq 50\%$ RTP. ITS require Mode 1 when $> P-8$. CTS have two operable channels redundancy one; i.e., three channels, maximum one in trip, inoperable ones in trip. ITS have three channels, inoperable ones in trip. CTS meet requirements by placing inoperable channels in trip. No CT is given, but one hour is reasonable; ITS say six hours (less restrictive). With unmet requirements, CTS keep $<10\%$ full power. No CT is given; ITS allow six or seven hours to reach $< P-7$. CTS do not verify operability; ITS verify operability at 24 months (more restrictive). CTS have no Limiting Safety System Setting (LSSS) setpoint; the ITS allowable value is 'NA'. Except as noted, these changes are equivalent administrative with no safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 15</p> <p>3.3.1 Function 15 Note H</p> <p>3.3.1 Condition H RA Note</p> <p>LCO 3.3.1</p> <p>LCO 3.3.1 RA J.1</p> <p>LCO 3.3.1 RA J.2</p> <p>SR 3.3.1.5</p> <p>SR 3.3.1.10</p>	<p>2.3.2.B</p> <p>2.3.1.C(2)</p> <p>2.3.1.C(3)</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-2 Function 12</p> <p>3.5.4</p> <p>Table 4.1-1 Item 21</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A22	<p>Generally, CTS do not treat ITS 3.3.1, Function 16 under RPS, but under Reactor Protection and ESF Initiation Logic. ITS modify CTS for trip initiation by SI signal. With requirements unmet, CTS imply Applicability; ITS require Mode 1 and 2 operability. CTS have two operable RPS channels and two operable ESFAS trains, with redundancy one in each case; i.e., as in ITS, two trains, inoperable trains restored. CTS meet requirements by placing inoperable channels in trip or restoring them. No CT is given, but an hour is reasonable; ITS give six (less restrictive). With unmet requirements, CTS begin shutdown in four hours, completing in the following four-six. ITS allow six or seven (more restrictive). CTS do 24-month SI operational test; ITS do 24-month TADOT, and modify TADOT definition. Allowable values are described in LCO 3.3.2, Discussion of Changes. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 16</p> <p>LCO 3.3.1 RA K.1</p> <p>LCO 3.3.1 RA K.2</p> <p>LCO 3.3.1 Condition K RA Note</p> <p>SR 3.3.1.14</p> <p>SR 3.3.1.14 Note</p>	<p>3.5</p> <p>Table 3.5-2 Item 14</p> <p>Table 3.5-2 Footnote *</p> <p>Table 3.5-3 Item 6</p> <p>3.5.4</p> <p>4.5.A.1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A23	<p>For RTBs: CTS imply Applicability in Modes 1 and 2 and Mode 3 if Rod Control System can withdraw rods. ITS have this Function in Modes 1 and 2 and in 3-5 if Rod Control System can withdraw rods or all rods are not inserted fully (less restrictive). CTS require bypass breaker tests. ITS RTB requirements apply to bypass breakers that are racked in and closed for bypassing an RTB. CTS have two operable channels with redundancy one. This requires inoperable channels restored. ITS require two trains and restore inoperable channels in an hour in Mode 1 or 2 and 48 hours in Mode 3- 5 when Rod Control System can withdraw rods or rods are not inserted fully. Except Applicability, Mode 3- 5 requirements are consistent with CTS. In Mode 1 and 2, CTS meet requirements by placing inoperable channels in trip or restoring train. No CT is given, but an hour is reasonable; ITS give an hour. In Mode 3, CTS restore channel in 48 hours, or rod withdrawal ability must be defeated in the following hour. ITS give 48 hours to restore, or withdrawal ability is defeated in following hour. CTS require testing RTBs at TM frequency. ITS do TADOT at 31 days on Staggered Test Basis. Consistently with CTS, ITS test bypass breaker before placing in service. CTS test RTBs and bypass breakers from CR at 24 months. ITS do TADOT at 24 months. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 18</p> <p>3.3.1 Function 18 Note i</p> <p>Table 3.3.1-1 Note b</p> <p>LCO 3.3.1 RA L.1</p> <p>LCO 3.3.1 RA C.1</p> <p>LCO 3.3.1 RA C,2</p> <p>LCO 3.3.1 RA L.1</p> <p>SR 3.3.1.14 Note</p>	<p>3.5</p> <p>Table 3.5-2 Function 13</p> <p>Table 3.5-2 Note ****</p> <p>3.5.4</p> <p>Table 4.1-1 Item 39</p> <p>Table 4.1-1 Item 40 Remarks</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A24	<p>ITS modify CTS for RTB undervoltage and shunt trip mechanisms as follows: a. CTS imply Mode 1 and 2 Applicability by requiring hot shutdown if requirements are unmet. CTS also require defeat of rod withdrawal ability in an hour after reactor is in Mode 3 for 48 hours as a result of an inoperable RTB. ITS require this function in Modes 1 and 2 and in Modes 3, 4, and 5 if the Rod Control System can withdraw rods or all rods are not inserted fully (less restrictive). b. CTS require two operable channels with redundancy of one. This requires two channels of undervoltage and two channels of shunt trip mechanisms and requires an inoperable channel be restored. In addition, ITS require an inoperable channel restored in 48 hours in Mode 1 or 2. c. CTS require a channel be restored in 72 hours if either undervoltage or shunt trip are inoperable; ITS allow 48. With more than one channel inoperable, or the channel not restored in 72 hours, CTS require hot shutdown in four. ITS require shutdown according to LCO 3.0.3. If inoperable channels are found in Mode 3, 4, or 5 and the Rod Control System can withdraw rods or all rods are not inserted fully, ITS require restoring the inoperable channel in 48 hours or defeating rod withdrawal ability in the following hour. ITS immediately insert all control rods if the channel is not restored in 48 hours. d. CTS test RTBs at TM frequency . ITS keep this requirement with a TADOT at a 31-day frequency on a Staggered Test Basis. ITS specify that this be done on the reactor trip bypass breaker prior to placing it in service. This is consistent with CTS. Except as noted, each of these changes is equivalent administrative with no safety effect.</p>	<p>LCO 3.0.3</p> <p>3.3.1 Function 18</p> <p>3.3.1 Function 19</p> <p>Table 3.3.1-1 Note b</p> <p>LCO 3.3.1</p> <p>LCO 3.3.1 RA C.1</p> <p>LCO 3.3.1 RA C.2</p> <p>LCO 3.3.1 RA C.2.2</p> <p>LCO 3.3.1 RA O.1</p> <p>SR 3.3.1.4 Note</p>	<p>3.5</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Note *</p> <p>Table 3.5-2 Note ****</p> <p>Table 3.5-2 Function 13</p> <p>Table 4.1-1 Item 39</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A25	<p>ITS modify CTS for Reactor Protection Automatic Trip Logic as follows: CTS imply Mode 1 and 2 Applicability, and Mode 3 if Rod Control System can withdraw rods. ITS require this Function in Modes 1 and 2, and in Modes 3, 4, and 5 if the Rod Control System can withdraw rods or all rods are not inserted fully (less restrictive). CTS require two operable channels with redundancy one; i.e., two channels and inoperable channels restored. Thus, ITS restate the requirement for minimum channels as two trains and that inoperable channels be restored in six hours if in Mode 1 or 2; and, ITS require an inoperable channel restored in 48 hours if in Mode 3, 4, and 5 and the Rod Control System can withdraw rods or all rods are not inserted fully. In Mode 1 or 2, CTS require placing inoperable channels in trip or restoring train. No CT is given, but one hour is reasonable; ITS allow six. In Mode 3, CTS require channel restored in 48 hours after reactor is shut down or rod withdrawal ability must be defeated in the following hour. ITS also allow 48 hours to restore all channels or withdrawal ability must be defeated in the following hour. CTS require a test of the Reactor Protection Relay Logic at TM Frequency. ITS keep this requirement with an Actuation Logic Test at 31-day frequency on a Staggered Test Basis. Changes are equivalent administrative with no adverse safety effect except as noted.</p>	<p>3.3.1 Function 20</p> <p>3.3.1 Function 20 RA K.1</p> <p>Table 3.3.1-1 Note a</p> <p>LCO 3.3.1 RA C.1</p> <p>LCO 3.3.1 RA C.2</p> <p>SR 3.3.1.5</p>	<p>3.5</p> <p>Table 3.5-2</p> <p>Table 3.5-2 Function 14</p> <p>Table 3.5-2 Note ****</p> <p>Table 4.1-1 Item 20a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A26	<p>ITS 3.3.1, Function 17.a unblocks SRM trip when decreasing power when two IRM channel signals indicate flux level in lower end of range. P-6 also has a permissive blocking SRM trip, when one IRM signal indicates flux level in IRM range. ITS keep these requirements as follows: a. Function must be operable when IRM is below P-6. ITS 3.3.1, Function 4 must be operable when needed. b. ITS require two operable trains of P-6 Function. One channel of Intermediate Range Neutron Flux trip, must be operable. ITS 3.3.1, Function 4, SRM Flux trip must be operable when required. c. ITS specify that if a channel is inoperable, the interlock must be as required for plant conditions. In conjunction with ITS 3.3.1, Function 17.a Applicability, the only ITS 3.3.1, Function 17.a, requirement is that ITS 3.3.1, Function 4, SRM Flux trip be operable when needed. d. ITS require periodic COT and Calibrations for this interlock. e. The setpoint for ITS 3.3.1, Function 17.a, is not in the accident analysis, but based on engineering judgement. This ensures that ITS 3.3.1, Function 4, SRM Flux trip is operable until there is IRM indication when increasing power and before indication is lost when decreasing power. Except as noted, each change is equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Function 3</p> <p>3.3.1 Function 4</p> <p>3.3.1 Function 17</p> <p>3.3.1 Function 17.a</p> <p>3.3.1 Table 3.3.1-1</p> <p>3.3.1 RA M.1</p> <p>SR 3.3.1.11</p> <p>SR 3.3.1.13</p>	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
A27	<p>ITS 3.3.1, Function 17.b provides an interlock that enables various RPS trips that are required only when operating above P-7 and disabling these trips when reactor power is below P-7. ITS keep these requirements as follows: a. ITS 3.3.1, Function 17.b, P-7, is required operable in Mode 1 to ensure that P-7 performs its design function b. ITS 3.3.1, Function 17.b, requires 2 operable trains of the P-7 function. c. ITS specify that if a channel is inoperable, the operator must verify interlock is in the required state for plant conditions. This means that the various ITS 3.3.1 functions enabled by this interlock are operable when required. d. ITS require periodic COTs and Channel Calibrations for this interlock e. Setpoints for this interlock are derived from ITS 3.3.1, Function 17.d and ITS 3.3.1, Function 17.e. Except as noted, each of the changes described is an equivalent administrative change with no adverse effect on safety.</p>	<p>3.3.1 Function 17.b Function 17.c Function 17.d Function 17.e 3.3.1 RA N.1 Table 3.3.1-1 SR 3.3.1.11 SR 3.3.1.13</p>	None
A28	<p>ITS 3.3.1, Function 17.c, is an interlock that automatically enables Reactor Coolant Flow — Low and RCP Breaker Position reactor trip on low flow in one or more RCS loops on increasing power. This interlock automatically enforces CTS. P-8 is actuated at $\leq 50\%$ RTP. ITS keep these requirements as follows: a. P-8, must be operable in Mode 1 to ensure that it performs its function. b. Function 17.c, requires four operable channels of P-8 Function. c. ITS say that if a channel is inoperable, the operator must verify interlock is as required for plant conditions. Thus, ITS 3.3.1 Functions enabled by the interlock must be operable when required. d. CTS have testing for P-8 consistent with testing for Nuclear Power Range instruments. ITS keep this and do periodic COTs and Channel Calibrations for this interlock. e. CTS set trip setpoints for P-8 at nuclear flux $< 50\%$ rated power. The ITS allowable value is 'NA' because there is no analytical limit modeled for this function. Except as noted, this change is equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 3.3.1 Table 3.3.1-1 3.3.1 RA N.1 SR 3.3.1.11 SR 3.3.1.13</p>	<p>2.3.2.B Table 4.1-1 Item 1 Remark 2</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A29	<p>ITS 3.3.1, Function 17.d is an interlock that automatically enables Functions 2.b and 3 on decreasing power. It also has a permissive to block SRM, IRM, and Power Range Neutron Flux-Low trips on increasing power. This automatically enforces CTS by serving as input to P-7. The P-10 interlock is actuated at about 10% RTP as determined by two-out-of-four NIS power range detectors. ITS keep these requirements as follows: a. Function 17.d, P-10, must be operable in Modes 1 and 2 to ensure that P-10 performs its design function. b. ITS require four operable channels of P-10 Function. c. ITS specify that if a channel is inoperable, the interlock must be in the required state for plant conditions. This requires that the ITS Functions enabled by this interlock be operable when required. d. CTS require testing for P-10 Interlock consistent with testing for Nuclear Power Range instruments. ITS keep this requirement and require periodic COT and Channel Calibrations for this interlock. e. ITS set trip setpoints for P-10 interlock at nuclear flux < 10% rated power. The ITS allowable value is 'NA' because there is no analytical limit modeled for this function. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 Table 3.3.1-1</p> <p>3.3.1 Function 17.d</p> <p>3.3.1 Function 3</p> <p>3.3.1 RA M.1</p> <p>SR 3.3.1.13</p> <p>SR 3.3.1.11</p>	<p>2.3.2.A</p> <p>2.3.2.A.1</p> <p>Table 4.1-1 Item 1 Remark 2</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A30	<p>ITS 3.3.1, Function 17.e is one of the inputs to P-7 which is an interlock that enables various RPS trips that are required only when operating above P-7 and disabling these trips when reactor power is < P-7. This interlock automatically enforces requirements established by CTS. ITS keep these requirements as follows: a. ITS 3.3.1, Function 17.d, is required operable in Mode 1 to ensure that P-7 performs it's design function of ensuring that the various ITS 3.3.1 Functions enabled by this interlock are enabled before exceeding the P-7 setpoint. b. ITS 3.3.1, Function 17.b, requires 2 operable channels of the Turbine First Stage Pressure Function. c. ITS specify that if a channel is inoperable, the verify interlock is in the required state for plant conditions. Therefore, this requires that the various ITS 3.3.1 Functions enabled by this interlock are operable when required. d. CTS require daily Channels Checks, quarterly COTs, and 24 month Channels Calibrations. ITS and keep these requirements at the existing Frequency. e. CTS establishes the trip setpoints for the Turbine First Stage Pressure interlock at nuclear flux > 10% of rated power. The ITS allowable value is 'NA' because there is no analytical limit modeled for this function. Except as noted, each of the changes described is an equivalent administrative change with no adverse effect on safety.</p>	<p>3.3.1 RA N.1</p> <p>3.3.1 Function 17.b</p> <p>3.3.1 Function 17.d</p> <p>3.3.1 Function 17.e</p> <p>3.3.1 Table 3.3.1-1</p> <p>SR 3.3.1.1</p> <p>SR 3.3.1.11</p> <p>SR 3.3.1.13</p>	<p>2.3.2.A.2</p> <p>Table 4.1-1 Item 19</p>
A31	<p>CTS specify that operation be permitted according to Tables 3.5-2 through 3.5-4 for instrumentation testing or channel failure; and, no more than a channel of a particular protection channel set shall be tested simultaneously. ITS set equivalent requirements and allowances by establishing specific RAs for each Function. Specifically, ITS 3.3.1, RAs and associated Notes establishing time limits for testing, always require verification that the inoperable channel does not result in a loss of trip Function before allowable OOS time may be applied for testing or inoperability. In addition, ITS RA Notes limit the number of channels made inoperable by testing by requiring that the trip Function be maintained during testing. This is an equivalent administrative change with no safety effect since there is no change to existing requirements.</p>	<p>3.3.1 RAs Notes</p>	<p>3.5.2</p> <p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A32	<p>ITS 3.3.1 Actions are preceded by a Note specifying, "Separate Condition entry is allowed for each channel." This allowance explicitly recognizes that the ITS allows completely separate re-entry into any Condition for each train and channel addressed by the Condition. This includes separate tracking of CT based on this re-entry. This allowance is consistent with an unstated assumption in the CTS. Therefore, the addition of this Note is an equivalent administrative change with no effect on safety.</p>	3.3.1 RAs Note	None
A33	<p>CTS 3.5.4 includes the allowance, "In the case of three loop operation, the OOS channel is permitted to be bypassed during the test period." In addition, CTS Table 3.5-2, Item 8, set minimum requirements based on the number of operable loops. These allowances support IP3 operation with fewer than four loops operable and operating. These allowances are not included in the ITS because the current analysis does not support operation with fewer than four loops operable and operating. This is an equivalent administrative change with no effect on safety since it eliminates an allowance that cannot be used because of other TS constraints.</p>	None	3.5-2 Table Item 8 3.5.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
A34	<p>CTS set minimum requirements for protective instrumentation operability by mandating minimum operable channels and redundancy. Operable channel is defined as one that generates a single protective action signal. This excludes channels in trip. CTS requirements for minimum operable channels ensure sufficient channels to monitor conditions. Minimum degree of redundancy is defined as the difference between number of operable channels and number of channels which, when tripped, will cause automatic system trip. The CTS requirement for minimum redundancy ensures the required ability to tolerate random failures of protective and control circuits. CTS let operation continue indefinitely with an inoperable channel only if the required minimum channels and redundancy are kept. This is achieved by placing the inoperable channel in trip. ITS specify only the minimum number of Required Channels and use RAs to specify that one required channel may be inoperable if put in trip or restored within AOT. RAs are specific to each Function and ensure that number of channels and redundancy are kept when one or more channels are inoperable. In ITS, requirements for minimum operable channels are enforced by combining a requirement for minimum number of channels and a requirement to restore or trip an inoperable channel. This is an equivalent administrative change with no adverse safety effect.</p>	3.3.1	<p>1.7.1</p> <p>1.8</p> <p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>
A35	<p>CTS specify that the Function be operable when Power < P-8 and \geq P-10. This Function has interlocks that make it function at < P-8 and \geq P-7. CTS require that the Low Flow Two Loop Function be unblocked when power range nuclear flux \geq 10% rated power; or turbine first stage pressure \geq 10% equivalent full load. This combination is defined as the P-7 interlock. Part 1 of the interlock, power range nuclear flux \geq 10% rated power, is the P-10 interlock. Thus, CTS should specify Applicability using P-7. This error has no safety effect since the P-7 and P-10 interlocks have the same setpoint; plant design correctly provides the interlock based on P-7; and the FSAR correctly describes this feature and associated requirements. This discrepancy is corrected in ITS. Neither the typographical error nor this equivalent administrative change have any safety effect.</p>	3.3.1 Function 9.b Note g	2.3.2.A Table 3.5-2 Item 8.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
A36	<p>The CTS set minimum requirements for protective instrumentation operability and specify the RAs if these requirements are unmet. Typically, these RAs specify hot shutdown. ITS specify specific RAs designed to place the plant outside the Applicability. This is an equivalent administrative change with no adverse effect on safety since it is consistent with current practice and interpretation of the CTS requirement.</p>	<p>LCO 3.3.1 LCO 3.3.2</p>	<p>Table 3.5-2 Table 3.5-3 Table 3.5-4</p>
A37	<p>The CTS allow channel bypass for up to eight hours during testing without taking RAs for an inoperable channel if Function trip capability is maintained. ITS keep this allowance for surveillance testing and for setpoint adjustment of other channels. This is an equivalent administrative change with no adverse effect on safety since it is consistent with current practice and interpretation of the CTS requirement.</p>	<p>LCO 3.3.1 RAs Notes</p>	<p>3.5.4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.3.2	3.5
A2	The CTS statements of Objective and Applicability were replaced, and the STS format for Applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.3.2	3.5
A3	The CTS Applicability for Safety Injection-Manual initiation is above cold shutdown; ITS Applicability is in Modes 1-4. CTS require one operable channel, zero degree of redundancy for manual initiation; ITS require two operable channels. For loss of manual trip redundancy, CTS have no RAs since CTS require one operable channel, zero degree redundancy; ITS require that with one of two channels inoperable, both be restored in 48 hours. For manual trip function loss, CTS say hot shutdown in four hours, cold in 48; ITS go to LCO 3.0.3. CTS test SI every 24 months; ITS TADOT is every 24 months. ITS include SI timers. This Function has no allowable value or setpoint. WCAP-10271 applies. Except as noted, changes are equivalent administrative with no adverse safety effect.	3.3.2 Function 1.a LCO 3.3.2 RA B.1 LCO 3.0.3 LCO 3.8.1 SR 3.3.2.6 Note 4.6.A.3	Table 3.5-3 Item 1.a 3.5.1 3.5-3 Note 6 Table 4.1-1 4.5.A.1.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>The CTS Applicability is >cold shutdown; ITS is Modes 1- 4. CTS require two operable trains, one train redundancy. ITS require two trains and restoring inoperable channels. For redundancy or function loss for Automatic Actuation Logic and Actuation Relays, CTS restore trains immediately or have hot shutdown in four hours, cold in 48. ITS differentiate between one and two inoperable trains. WCAP-10271 applies. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 1.b</p>	<p>3.5.1 Table 3.5-3 Note 6</p>
A5	<p>ESF Initiation CTS Applicability is above cold shutdown; ITS is Modes 1- 3. CTS have three operable channels, inoperable ones in trip, maximum one in trip. ITS have three operable channels, inoperable ones in trip. For redundancy or function loss, the CTS restore immediately or have hot shutdown in four hours, cold in 48. For redundancy loss, CTS trip inoperable channels immediately, ITS in six hours; ITS say Mode 3 in six hours, 4 in 18. For function loss, ITS use LCO 3.0.3. CTS check shiftly, test quarterly. ITS check at 12 hours, COT at 92 days. Both calibrate at 24 months. CTS High Containment Pressure is ≤ 4.5 psig; ITS is ≤ 4.80 psig. Changes are equivalent administrative with no adverse safety effect except as in DOCs.</p>	<p>3.3.2 LCO 3.3.2 RA D.1 3.3.2 Function 1.c LCO 3.0.3 SR 3.3.2.4 SR 3.3.2.1 SR 3.3.2.7</p>	<p>3.5.1 Table 3.5-1 Item 1 Table 3.5-3 Item 1.b 3.5.8 Table 3.5-3 Note 6 Table 4.1-1 Item 14.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	<p>The CTS ESF Initiation Applicability is >cold shutdown; low pressurizer pressure SI trip is unblocked at ≥ 2000 psig. ITS is Modes 1 to 3 above Pressure Interlock. For loss of redundancy or function, CTS restore immediately or go to hot shutdown in four hours, cold in 48. ITS differentiate between one and two inoperable channels not in trip. For redundancy loss, CTS trip inoperable ones immediately; ITS in six hours. The ITS go to Mode 3 in six hours, 4 in 18 for redundancy unrestored. For potential function loss, ITS use LCO 3.0.3. CTS check shiftly, test quarterly; ITS check at 12 hours, test at 92 days. Both calibrate every 24 months. CTS allowable is ≥ 1700 psig; ITS is ≥ 1690 psig. Except as noted, this change is equivalent administrative without adverse safety effect.</p>	<p>3.3.1 3.3.2 Function 1.d LCO 3.3.2 3.3.2 RA D.1 LCO 3.3.2 RA D.2.1 RA D.2.2 LCO 3.0.3 SR 3.3.2.1 SR 3.3.2.7 SR 3.3.2.4</p>	<p>Table 3.5-1 Item 3 Table 3.5-3 Item 1.d Table 3.5-3 Note 3 Table 3.5-3 Note 6 3.5.5 Table 4.1-1 Item 7 3.5.1 3.5.8</p>
A7	<p>CTS Applicability for ESF Initiation is > cold shutdown; ITS Applicability is in Mode 1 to 3 (less restrictive). CTS have three channels /steam line, and two channels / line in any line actuate. CTS have two operable channels / line with redundancy of one / line. This means three channels / line with maximum one / line in trip and implied requirement to trip inoperable ones. ITS have three channels / line, inoperable channels tripped. CTS have shiftly channel check, quarterly test, calibration at 24 months; ITS have channel check at 12 hours, operational test every 92 days, and calibration at 24 months. CTS testing allowances are kept. CTS set allowable at ≤ 150 psi; ITS allowable value is 'NA' because this Function is not credited/modeled in the safety analysis. Except as noted, these changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 1.e RA D.1 SR 3.3.2.1 SR 3.3.2.4</p>	<p>3.5.1 Table 3.5-1 Item 4 Table 3.5-3 Item 4 Table 4.1-1 Item 18</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	<p>CTS Applicability is >cold shutdown; ITS is Mode 1-3 unless MSIVs are closed (less restrictive). For High Steam Flow, CTS have a channel / line in each of three lines, redundancy one / line in each of three lines; ITS have two operable channels / line, inoperable ones in trip (more restrictive). For T_{avg}-Low, CTS have three channels, two redundancy; i.e., a channel / loop, maximum one in trip, inoperable ones in trip. ITS have one / loop, inoperable ones in trip. For redundancy or function loss, CTS restore immediately or do hot shutdown in four hours, cold in 48. ITS differentiate between one and two inoperable channels in trip. For redundancy loss, CTS trip inoperable ones immediately, ITS in six hours. If not in trip in AOT, ITS do Mode 3 in six hours, 4 in 18. For function loss, ITS use LCO 3.0.3. CTS check shiftly, test quarterly; ITS check at 12 hours, COT at 92 days. Both calibrate at 24 months. CTS flow is $\leq 49\%$ full at 0 load and at 20%, $\leq 110\%$ at full load. CTS T_{avg} is ≥ 540 °F. ITS T_{avg}- Low is ≥ 535.6 °F. ITS flow is \leq turbine first stage pressure corresponding to 54% full flow at <20% load, increasing to 110% flow at $\geq 100\%$. Except as noted, this change is equivalent administrative.</p>	<p>LCO 3.0.3 LCO 3.3.2 LCO 3.3.2 Function 1.f RA D.1 LCO 3.3.2 RA D.2.1 RA D.2.2 SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7</p>	<p>Table 3.5-1 Item 5 Table 3.5-1 Item 5.a Table 3.5-3 Item 1.e.1 Table 3.5-3 Note 6 Table 4.1-1 Item 4 Table 4.1-1 Item 18 Table 4.1-1 Item 19 Table 4.1-1 Item 45</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A9	<p>ITS 3.3.2, Function 1.g. is the same as CTS Table 3.5-1, Item 5, and Table 3.5-3, Item 1.e.2. Changes are as for Function 1.f. a. (See 3.3.2, DOC A.8.a). b. (See 3.3.2, DOC A.8.b. Same discussion; steam line pressure replaces T_{avg}). c. (See 3.3.2, DOC A.8.c). d. (See 3.3.2, DOC A.8.d for Steam Flow). CTS channel check shiftily, test quarterly; ITS do a 12-hour channel check, 92-day test. Both calibrate at 24 months. (See ITS 3.3.2, DOC A.36). e. (See 3.3.2, DOC A.8.e for Steam Flow). CTS Low Steam Line Pressure allowable is ≥ 600 psig; ITS is ≥ 500 psig. Change is from Engineering Standards Manual (See ITS 3.3.1, DOC L.1). f. (See 3.3.2, DOC A.8.f). Except as noted, this change is equivalent administrative with no adverse safety effect.</p>	<p>3.3.1 3.3.2 Function 1.f 3.3.2 Function 1.g SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7</p>	<p>Table 3.5-1 Item 5 Table 3.5-3 Item 1.e.2 Table 4.1-1 Item 18</p>
A10	<p>CTS ESF initiation Applicability is above cold shutdown; ITS is in Modes 1 to 4. CTS have two operable channels, zero redundancy; ITS have two trains, two channels per train. CTS and ITS need two contacts for A and two for B. For redundancy loss, CTS have no RAs; with a required channel inoperable, ITS have both operable in 48 hours. For manual trip function loss, CTS go to hot shutdown in four hours, cold in 48; ITS use LCO 3.0.3. CTS omit manual initiation test, but do 24-month CS test. ITS verify manual initiation operability with 24-month TADOT, but omit setpoint verification. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 2a LCO 3.3.2 R.A. B.1 LCO 3.0.3 SR 3.3.2.6</p>	<p>Table 3.5-3 Item 2.a Table 3.5-3 Note 6 Table 4.1-1 4.5.A.2.a</p>
A11	<p>ITS 3.3.2, Function 2.b. is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the operability of the ESFAS CS functions. This is an equivalent administrative change with no adverse safety effect.</p>	<p>3.3.2 Function 2.b</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A12	<p>CTS ESF Initiation Applicability is > cold shutdown; ITS is Mode 1-3. High Containment Pressure has two sets of three channels each. To actuate CS, two channels from each set energize. CTS have two operable channels per set, one channel per set redundancy; i.e., two sets of three channels, maximum one in each set in trip, inoperable channels in trip. ITS have two sets of three channels, inoperable ones tripped. For redundancy loss, CTS trip inoperable channels immediately; ITS in six hours. For redundancy unrestored in AOT, ITS do Mode 3 in six hours, 4 in 18. For function loss, ITS use LCO 3.0.3. In CTS only MSIVs are closed if only MSIV circuitry is affected. With only one function affected, ITS use only related RAs. CTS check shiftly, test quarterly; ITS check at 12 hours, test at 92 days. Both calibrate at 24 months. CTS allowable is ≤ 24 psig; ITS is ≤ 24 psig. Except as noted, changes are equivalent administrative with no adverse safety effect.</p>	<p>LCO 3.3.2</p> <p>3.3.2 Function 2.c RA E.1</p> <p>3.3.2 RA E.2.1</p> <p>3.3.2 RA E.2.2</p> <p>LCO 3.0.3</p> <p>SR 3.3.2.1</p> <p>SR 3.3.2.4</p> <p>SR 3.3.2.7</p>	<p>3.5-1</p> <p>Table 3.5-1 Item 2</p> <p>Table 3.5-3 Item 2.b Note 8</p> <p>Table 3.5-3 Note 6</p> <p>Table 4.1-1 Item 14.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A13	<p>a. CTS set Applicability for ESF Initiation instruments as > cold shutdown. ITS require this function operable in Mode 1-4. b. CTS require 1 operable channel with redundancy zero, but IP3 design includes 2 channels such that either will initiate both trains of Phase A Isolation. ITS require two operable channels. d. CTS do not set a specific requirement to test the Containment Phase A Isolation-Manual Initiation Function, but require that CIVs be tested according to the Containment Leak Rate Test Program. Consistent with this requirement, ITS keep requirements to verify operability of the manual initiation function by doing a TADOT at 24 months. The SR is modified by a Note excluding verification of setpoints during the TADOT for manual initiation functions since these functions have no associated setpoints. e. There is no allowable value or setpoint associated with this function. f. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by The licensee and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Except as noted, the change is equivalent administrative with no adverse safety effect.</p>	<p>3.3.2 Function 3.a(1) SR 3.3.2.6</p>	<p>Table 3.5-4 Item 1.c Table 4.1-1 3.5.1 4.4</p>
A14	<p>ITS 3.3.2, Function 3.a.2, Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable in order to support the operability of all ESFAS Containment Phase A Isolation Functions. This is an equivalent and administrative change.</p>	<p>3.3.2 Function 3.a.2</p>	<p>None</p>
A15	<p>This Function consists of a contact that initiates Containment Phase A Isolation as a result of an SI signal. CTS Table 3.5-4, Item 1.a. references CTS for CTS requirements for this Function. ITS 3.3.2, Function 3.a.(3), Containment Phase A Isolation-SI, refers to Function 1 for all initiation functions and requirements. This cross reference is appropriate since all requirements for inputs to the Containment Phase A Isolation-SI are appropriately addressed by SI requirements and all outputs are addressed by ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. Thus, there are no changes to CTS requirements except as discussed elsewhere. This is an equivalent administrative change.</p>	<p>3.3.2 Function 3.a(3)</p>	<p>Table 3.5-3 Item 1.b Table 3.5-4 Item 1.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A16	ITS 3.3.2, Function 3.b.(1) is equivalent to CTS Table 3.5-4, Item 1.c. CTS Table 3.5-4, Item 1.c references Table 3.5-3, Item 2(a) as the source of requirements for this Function. This is not correct. CTS Table 3.5-4, Item 1.c, has the same system design, operability requirements, and testing Requirements as CTS Table 3.5-4, Item 1.c). (See ITS 3.3.2, DOC A.13 for a discussion of the changes for this Function.) This is an equivalent administrative change.	3.3.2 Function 3.b.1	Table 3.5-3 Item 2(a) Table 3.5-4 Item 1.c
A17	ITS 3.3.2, Function 3.b(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the Operability of all ESFAS Containment Phase B Isolation Functions. This is an equivalent administrative change.	3.3.2 Function 3.b(2)	None
A18	ITS 3.3.2, Function 3.b.(3) Containment Phase B Isolation-Containment Pressure , is equivalent to CTS Table 3.5-1, Item 2.a, and CTS Table 3.5-4, Item 1.b., Containment Pressure. ITS modify CTS as follows: a. (See ITS 3.3.2, DOC A.12.a). b. c. (See ITS 3.3.2, DOC A.12.b with the exception that the Actions specified in CTS Table 3.5-3, Note 6, are identical to the Actions specified CTS Table 3.5-4, Note 1, for this Function. CTS and ITS allowable values are as discussed in DOC A.12. Confirmation of the applicability of WCAP-10271 to IP3 has already been confirmed by The licensee and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Each of the changes described is an equivalent administrative change with no adverse effect on safety except as noted with a cross reference to the associated justification.	3.3.2 Function 3.B(3)	Table 3.5-1 Item 2.a Table 3.5-4 Item 1.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
A19	<p>CTS Applicability for ESF initiation is > cold shutdown; with requirements unmet, CTS allow cold shutdown or shutting all MSIVs. Unless MSIVs are closed, ITS require this Function in Modes 1-3 (less restrictive). CTS have a channel per loop, zero redundancy; ITS have two channels per line (more restrictive). For manual trip redundancy loss, CTS have no RAs since CTS have only one operable channel with zero redundancy for manual initiation. ITS say that with one of two required channels inoperable, both must be operable in 48 hours. With requirements unmet in AOT, CTS and ITS put plant outside applicability for Function 4.a. For manual trip function loss, CTS have hot shutdown in four hours, cold in 48; ITS use LCO 3.0.3. CTS do not test Steam Line Isolation-Manual Initiation, but test MSIV closing at 24 months. ITS keep requirement to verify manual initiation with 24-month TADOT. SR is modified by a Note omitting setpoint verification during TADOT for manual initiation functions. Except as noted, each is an equivalent administrative change without adverse safety effect.</p>	<p>3.3.2 Function 4.a</p> <p>LCO 3.3.2 RA F.1</p> <p>SR 3.3.2.6</p>	<p>Table 3.5-4 Item 2.c</p> <p>Table 3.5-4 Note 1</p> <p>Table 4.1-1 4.7</p>
A20	<p>ITS 3.3.2, Function 4.b., Steam Line Isolation-Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is implicitly required to be operable to support the operability of all ESFAS Steam Line Isolation Functions. This is an equivalent administrative change.</p>	<p>3.3.2 Function 4.b</p>	<p>None</p>
A21	<p>ITS 3.3.2, Function 4.c., is equivalent to CTS Table 3.5-1, Item 2.b, and Table 3.5-4, Item 2.b. Both CTS and ITS require only that the plant be placed outside the applicability for Function 4.c, which can be achieved by closing all of the MSIVs even if the plant remains in Mode 2 or 3. d. (See ITS 3.3.2, DOC A.12.d). e. (See ITS 3.3.2, DOC A.12.e)f. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by The licensee and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. Each of the changes described above is an equivalent administrative change with no adverse effect on safety except as noted with a cross reference to the associated justification.</p>	<p>3.3.2 Function 4.c</p>	<p>Table 3.5-1 Item 2.b</p> <p>Table 3.5-4 Item 2.b</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A22	<p>ITS 3.3.2, Function 4.d., is equivalent to CTS Table 3.5-1, Item 5.b, and Table 3.5-4, Item 2.a.1. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by The licensee and reviewed by the NRC as part of TS Amendment 107, dated March 22, 1991. However, to conform to the assumptions of WCAP-10271, ITS 3.3.2, Function 4.d will increase requirements for steam flow channels to require 2 channels per steam line on all 4 steam lines (See 3.2.2, DOC M.2). Except as noted, each of the changes described above is an equivalent administrative change with no adverse effect on safety.</p>	3.3.2 Function 4.d	<p>Table 3.5-1 Item 5.b</p> <p>Table 3.5-4</p>
A23	<p>ITS 3.3.2, Function 4.e., is equivalent to CTS Table 3.5-1, Item 5.b, and to CTS Table 3.5-4, Item 2.a.2 (Steam Line Isolation) High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure. (See 3.3.2, DOC A.9.c for changes to the RAs for this Function.) d. (See 3.3.2, DOC A.9.d, for a discussion of changes to Surveillance Testing for this Function.) e. (See 3.3.2, DOC A.9.e, for a discussion of changes to the allowable values for this Function.) f. (See 3.3.2, DOC A.22.f, for a discussion of verification of conformance with the assumptions of WCAP-10271.) Except as noted, each change described is an equivalent administrative change with no adverse effect on safety.</p>	3.3.2 Function 4.e	<p>Table 3.5-1 Item 5.b</p> <p>Table 3.5-4 Item 2.a.2</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A24	<p>CTS Applicability is > cold shutdown; ITS is Mode 1- 2 (see DOC L.4). CTS say two operable trains, redundancy one; ITS say two trains, restore inoperable ones. For Automatic Actuation Logic and Relay redundancy or function loss, CTS restore trains immediately or do hot shutdown in four hours, cold in 48. ITS distinguish one and two inoperable trains. In redundancy loss, ITS say six hours or Mode 3 in six hours. Plant may be out of Applicability by closing MBFPDVs or MBFRVs and bypass valves or isolating by closed manual valve. In function loss, ITS do LCO 3.0.3. Plant may be out of Applicability by closing MBFPDVs or MBFRVs and bypass valves or isolating manual valve. CTS test Actuation Relay Logic; ITS test Automatic Actuation Logic and Relays. Changes are equivalent administrative without adverse safety effect.</p>	<p>LCO 3.3.2 Function 5 RA H.1 RA H.2</p> <p>SR 3.3.2.2</p> <p>SR 3.3.2.5</p>	<p>3.5.1</p> <p>Table 3.5-3 Item 1</p> <p>Table 3.5-4 Item 3.a</p> <p>Table 3.5-4 Note 1</p> <p>Table 4.1-1 Item 20.b</p> <p>4.5.A.1.a</p>
A25	<p>ITS 3.3.2, Function 6.a, AFW - Automatic Actuation Logic and Actuation Relays, is not listed in the CTS as a required Function, but it is required to be operable implicitly in order to support the operability of all ESFAS Auxiliary Feedwater Initiation Functions. (See ITS 3.3.2, DOC A.4 for the discussion of Automatic Actuation Logic and Actuation Relays.) This is an equivalent administrative change with no adverse safety effect.</p>	<p>3.3.2 Function 6.a</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A26	<p>CTS Applicability is >cold shutdown; with requirements unmet, CTS imply Applicability by reducing temperature to < 350 °F; ITS is Mode 1-3. CTS specify three channels/SG and that two channels/SG in any SG actuate motor driven pumps and two channels/SG in any two SGs actuate turbine driven pump. CTS have two operable channels/SG with redundancy one/SG; i.e., three channel/SG, maximum one/SG in trip, inoperable ones in trip. ITS have three operable channels/SG; inoperable ones in trip. For redundancy or function loss, with channel in one or more SGs inoperable, CTS restore immediately or do hot shutdown in four hours, cold in 48. ITS distinguish between one and two inoperable channels not in trip. For redundancy loss, CTS trip channel immediately; ITS give six hours. For redundancy loss, unrestored by tripping channel in AOT, ITS have Mode 3 in six hours, four in 18. This is an equivalent administrative change.</p>	<p>3.3.2 Function 6.B</p> <p>LCO 3.3.2 RA D.1</p> <p>LCO 3.3.2 RA D.2.1</p> <p>LCO 3.3.2 RA D.2.2</p>	<p>Table 3.5-1 Item 6</p> <p>Table 3.5-3</p> <p>Table 3.5-3 Item 3.a.i</p> <p>Table 3.5-3 Item 3.a.ii</p> <p>Table 3.5-3 Note 6</p> <p>3.5.1</p>
A27	<p>ITS 3.3.2, Function 6.c, AFW-SI, is same as CTS Table 3.5-3, Item 3.b, SI Signal (Start Motor Pumps). This Function initiates AFW following SI signal. CTS Table 3.5-3, Item 3.b. references CTS Table 3.5-3, Item 1, SI, for CTS requirements. ITS 3.3.2, Function 6.c, AFW-SI, refers to Function 1 (SI) for initiation functions and requirements. This is appropriate since requirements for input to AFW-SI are appropriately addressed by SI requirements (ITS 3.3.2, Function 1) and outputs are addressed by ITS 3.3.2, Function 6.c. AFW-SI-Automatic Actuation Logic and Relays. Thus, there are no changes to requirements except as discussed elsewhere (See 3.3.2, DOCs A.5 - A.9 for changes to SI Functions that initiate this Function.) This is an equivalent administrative change.</p>	<p>3.3.2 Function 6.c</p>	<p>Table 3.5-3 Item 3.b</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A28	<p>CTS Applicability is >cold shutdown; with requirements unmet, CTS imply Applicability by requiring < 350 °F. ITS Applicability is Mode 1- 3. CTS have an operable channel, no redundancy. CTS have a channel from either 480V bus 3A or 6A to start steam driven AFW pump. CTS specify this Function is needed to start only the turbine driven AFW pump. ITS require a channel per bus and two busses (more restrictive), and ITS Bases indicate that this Function is needed to start turbine driven pump only. For redundancy loss, for the AFW-LOOP, CTS do not specify RAs since CTS require only an operable channel with no redundancy for manual initiation. ITS say that if one of two required channels is inoperable, then both must be restored in 48 hours. For function loss for AFW-LOOP, CTS have hot shutdown in four hours, < 350 °F in 48. ITS do LCO 3.0.3. CTS and ITS test and calibrate at 24 months. CTS allowable for 480V Bus Undervoltage Relay Function is \geq 200 volts. ITS keep CTS allowable. The design for this Function is not in WCAP-10271, but AOTs and surveillance intervals are stricter than CTS, accident scenarios are protected by WCAP functions, and ITS requirements are consistent with FSAR. Except as noted, this is an equivalent administrative change.</p>	<p>3.3.2 Function 6.d</p> <p>LCO 3.3.2</p> <p>LCO 3.3.2 RA F.2</p> <p>LCO 3.0.3</p> <p>SR 3.3.2.6</p> <p>SR 3.3.2.7</p>	<p>3.5.1</p> <p>Table 3.5-1 Item 7.a</p> <p>Table 3.5-3</p> <p>Table 3.5-3 Note 6</p> <p>Table 3.5-3 Item 3.b</p> <p>Table 3.5-3 Item 3.c</p> <p>Table 4.1-1 Item 28.b</p>
A29	<p>CTS Applicability is >cold shutdown; with requirements unmet, CTS imply Applicability by requiring shutdown. With a main feed pump operating, ITS Applicability is Mode 1-2. CTS have an operable channel, no redundancy; ITS have a channel /operating pump. Together with the channel /operating pump requirement, when MBFP trip channels are inoperable, ITS verify that a channel related to an operating MBFP is operable. With two MBFPs operating, RA I.2.1 restores redundancy in 48 hours by requiring an operable channel / MBFP. With one MBFP operating, operation without redundant channels is acceptable. CTS and ITS test at 24 months. Though design is not WCAP-10271, AOTs and surveillance intervals are stricter than CTS; accident scenarios are protected by WCAP Functions. Except as noted, this is an equivalent administrative change.</p>	<p>3.3.2 Function 6.e</p> <p>SR 3.3.2.6</p>	<p>3.5.1</p> <p>Table 3.5-3 Item 3.d</p> <p>Table 4.1-1 Item 28.c</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A30	<p>ITS 3.3.2, Function 7, is equivalent to CTS 3.5.5 and Table 3.5-3, Item 1.f. The ITS modify CTS as follows: a. See ITS 3.3.2, DOC A.6.a and L.4 for Applicability. b. See ITS 3.3.2, DOC A.6.b for number of channels. c. CTS Table 3.5-3, Note 5, say Minimum Operable Channels and Redundancy may be zero if SI bypass is unblocked. ITS say that, with one or more channels inoperable, operators verify interlock is as required. Otherwise, inoperable Pressurizer Pressure-Low shutdown requirements apply. See ITS 3.3.2, DOC A.6.c. d. See ITS 3.3.2, DOC A.6.d for Surveillances. e. CTS specify unblocked low pressurizer pressure SI trip when pressure is > 2000 psig. The ITS allowable is 'NA' because the function is not credited in the safety analysis. Except as noted, these are equivalent administrative changes.</p>	<p>3.3.2 Function 7</p> <p>3.3.2 RA K.1</p>	<p>Table 3.5-3 Item 1.f</p> <p>Table 3.5-3 Note 5</p> <p>3.5.5</p>
A31	<p>CTS specify that operation may continue for instrumentation testing or channel failure; and, no more than one channel of a particular protection channel set shall be tested at once. ITS set equivalent requirements and allowances by having specific RAs for each Function. Specifically, ITS 3.3.1 RAs and Notes establishing testing time limits always require verification that the inoperable channel does not result in a loss of trip function before allowable OOS time may be applied for testing or inoperability. In addition, the ITS RA Notes limit the number of channels made inoperable by testing by requiring that the trip function be maintained during testing. This is an equivalent administrative change with no effect on safety since there is no change to existing CTS requirements.</p>	<p>3.3.1 RAs</p>	<p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>
A32	<p>ITS 3.3.2, ESFAS Instrumentation Actions, are preceded by a Note saying, "Separate Condition entry is allowed for each Function." This explicitly recognizes that the ITS allow completely separate re-entry into any Condition for each train and/or channel addressed by the Condition. This includes separate tracking of CTs based on this re-entry. This is consistent with an unstated assumption in the CTS. The addition of this Note is an equivalent administrative change with no adverse safety effect.</p>	<p>3.3.2</p>	<p>None</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A33	<p>In three loop operation, CTS allows the OOS channel to be blocked during testing. In addition, CTS Table 3.5-2, Item 8, sets minimum requirements based on the number of operable loops. These allowances support IP3 operation with fewer than four loops operable and operating. These allowances are not included in the ITS because the current analysis does not support operation with fewer than four loops operable and operating. This is an equivalent administrative change with no adverse effect on safety because it eliminates an allowance that cannot be used because of other TS constraints.</p>	None	<p>Table 3.5-2 Item 8</p> <p>3.5.4</p>
A34	<p>CTS set instrumentation operability requirements by mandating minimum channels and redundancy. CTS define <u>operable channel</u> as one that generates a single protective action signal when required. This excludes those in trip. The operable channels requirement ensures sufficient channels to monitor conditions. CTS define <u>minimum degree of redundancy</u> as the difference between number of operable channels and number of channels which, when tripped, cause automatic system trip. The redundancy requirement ensures random failure tolerance. CTS allow indefinite operation with an inoperable channel only with required channels and redundancy. This means tripping inoperable channels. ITS specify only minimum Required Channels and use RAs to say that one required channel may be inoperable if in trip or restored in AOT. RAs are Function-specific and ensure minimum channels and redundancy when channels are inoperable. ITS enforce requirements for operable channels by combining a minimum channel requirement and a requirement to restore or trip inoperable ones. This is an equivalent administrative change with no adverse safety effect since no requirements change except as justified in Function discussions.</p>	<p>LCOs</p> <p>RAs</p>	<p>1.7.1</p> <p>1.8</p> <p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A35	<p>CTS Table 3.5-3, Item 2.b. references CTS Table 3.5-3, Note 8; and, Table 3.5-4, Item 2.b. references CTS Table 3.5-4, Note 2. These Notes specify that only MSIVs need to be closed if the only portion of the circuit affected is MSIV closure circuitry. These Notes recognize that the same transmitters are used both for MSIV isolation and for CS. This Note is needed in neither CTS nor ITS since, if containment high pressure transmitters are inoperable, then RAs for both the steam line isolation and CS are applicable. If the inoperability affects only steam line isolation or containment spray, then only the RAs associated with the inoperable function are required. Not including these Notes in ITS is an equivalent administrative change with no adverse effect on safety.</p>	None	<p>Table 3.5-3 Item 2.b</p> <p>Table 3.5-3 Note 8</p> <p>Table 3.5-4 Item 2.b</p> <p>Table 3.5-4 Note 2</p>
A36	Not Used.		
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION			
Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	3.3.3	3.5
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.</p>	3.3.3	3.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 1, Neutron Flux. Establishing a standard format for presenting this information is an administrative change with no impact on safety. CTS does not have an explicit requirement for neutron monitoring as a PAM function. Refer to DOC M.1 regarding the addition of specific requirements in ITS.</p>	3.3.3	3.5.7
A4	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Functions 2 and 3, RCS Hot Leg and Cold Leg Temperatures, respectively. The information included is: Applicability: Less Restrictive for this Function; DOC L.1 Required channels: Increased from 1 to 1 per loop; DOC M.7 Actions and Time: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7. Surveillance Requirements: More Restrictive for this Function; DOC M.6</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 4, RCS Pressure (Wide Range). The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 to 2; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: More Restrictive for this Function, see DOC M.6</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A6	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 5, Reactor Vessel Level (RVLIS). The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 to 2; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Functions 6 and 7, Containment Water Level (Wide Range) and Containment Water Level (Recirculation Sump), respectively. The information included is:</p> <p>Applicability: More Restrictive for this Function; DOC M.9</p> <p>Required channels: Increased from 1 to 2 for both functions; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOCs M.4 and M.5. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: More Restrictive for this Function; DOC M.6</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A8	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 8, Containment Pressure. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 to 2; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains CTS SRs.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A9	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 9, Automatic Containment Isolation Valve Position Indication. Establishing a standard format for presenting this information is an administrative change with no impact on safety. CTS does not have an explicit requirement for neutron monitoring as a PAM function. Refer to DOC M.1 regarding the addition of specific requirements in ITS.</p>	3.3.3	3.5.7
A10	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 10, Containment Area Radiation (High Range). The information included is: Applicability: Less Restrictive for this Function; DOC L.1 Required channels: Increased from 1 to 2; DOC M.7 Allowed Outage Times: ITS maintains CTS required action (special report) for loss of function. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the initiation of alternate monitoring are relocated; DOC LA.6. Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A11	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 11, Containment Hydrogen Monitors. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 to 2; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A12	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 12, Pressurizer Water Level. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 2 to 3; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A13	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Functions 13 and 14, Steam Generator (SG) Level, narrow range and wide range, respectively. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from one level channel per SG (with at least 2 channels being wide range) to 3 channels per SG for narrow range and 1 channel per SG for wide range; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains CTS requirements for channel check and calibration</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A14	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 15, Steam Generator (SG) Pressure. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 per SG to 3 per SG; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains CTS requirements for channel check and calibration</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A15	ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 16, Condensate Storage Tank Level. Establishing a standard format for presenting this information is an administrative change with no impact on safety. CTS does not have an explicit requirement for neutron monitoring as a PAM function. Refer to DOC M.3 regarding the addition of specific requirements in ITS.	3.3.3	3.5.7
A16	Not Used		
A17	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Functions 18, 19, 20, and 21, Core Exit Thermocouples. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 2 detectors per quadrant to 4 detectors per quadrant; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4.</p> <p>Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A18	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 22, Main Steam Line Radiation. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: ITS maintains CTS required channels of 1 per steam line.</p> <p>Allowed Outage Times: ITS maintains CTS required action (special report) for loss of function. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the initiation of alternate monitoring are relocated; DOC LA.6.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A19	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 23, Gross Failed Fuel Detector. The information included is:</p> <p>Applicability: ITS adopts a reasonable interpretation of CTS requirements.</p> <p>Required channels: Increased from 1 channel, implicitly required in CTS to 2 channels; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (special report) for loss of function. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A20	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Function 24, RCS Subcooling Margin. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: Increased from 1 to 2; DOC M.7</p> <p>Allowed Outage Times: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8. Requirements regarding the recorder associated with this Function are relocated; DOC LA.7.</p> <p>Surveillance Requirements: ITS maintains 24-month channel calibration, however the daily channel check is changed to monthly; DOC L.2.</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A21	<p>ITS provides clarification that Separate Condition Entry is allowed for each channel, which is an unstated assumption in CTS. Providing this clarification is an administrative change with no impact on safety.</p>	3.3.3	3.5.7
A22	<p>ITS provides clarification that ITS LCO 3.0.4 is not applicable to Post Accident Monitoring Instrumentation because an equivalent of ITS LCO 3.0.4 is not in CTS, providing clarification that this provision is not applicable is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A23	<p>ITS LCO 3.3.3, including Table 3.3.3-1 is organized to provide information and requirements for Post Accident Monitoring (PAM) Functions 25, Auxiliary Feedwater Flow Rate. The information included is:</p> <p>Applicability: Less Restrictive for this Function; DOC L.1</p> <p>Required channels: ITS maintains the CTS required channels of 1 per pump. Wording is modified to state 1 per steam generator to be consistent with Function 14, SG wide range level.</p> <p>Actions and Time: ITS maintains CTS required action (plant shutdown) for loss of function, however ITS establishes a more restrictive completion time; DOC M.4. Also ITS establishes new required actions and completion times for loss of redundancy; DOC M.8.</p> <p>- Surveillance Requirements: More Restrictive for this Function; DOC M.6</p> <p>Establishing a standard format for presenting this information is an administrative change with no impact on safety.</p>	3.3.3	3.5.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.3.5	3.5
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.3.5	3.5
A3	The RAs for ITS 3.3.5 are preceded by a Note that specifies: "Separate Condition entry is allowed for each Function." This allowance provides explicit recognition that the ITS allow completely separate re-entry into any Condition for each train or channel addressed by the Condition. This includes separate tracking of CTs based on this re-entry. This allowance is consistent with an unstated assumption in the CTS. Therefore, the addition of this Note is an equivalent administrative change with no effect on safety.	3.3.5 RAs Note	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS set requirements for protective instrumentation operability by mandating a minimum number of operable channels and a minimum redundancy. The requirement for minimum operable channels ensures enough available channels to monitor plant condition. Minimum redundancy ensures required trip ability including tolerance for random failures of protective and control circuits. CTS allow indefinite plant operation with an inoperable channel if the minimum number of channels and required redundancy are maintained. ITS specify only a minimum number of Required Channels and use RAs that specify whether a channel may be put in trip or must be restored. The RAs are specific to each function and ensure that both minimum number of channels and redundancy are maintained with one or more inoperable channels. There is no change to existing requirements for minimum number of operable channels or redundancy level, except these requirements are enforced by the combination of a requirement for a minimum number of channels and a specific requirement to restore or trip an inoperable channel. This is an equivalent administrative change.</p>	3.3.5	<p>Table 3.5-2</p> <p>Table 3.5-3</p> <p>Table 3.5-4</p>
A5	<p>CTS Table 3.5-1, Note *, modifying item 7, states that the requirements are to be effective after completion of all required modifications. ITS LCO 3.3.5 does not retain this note because the modifications are completed. Elimination of the note is an equivalent administrative change.</p>	LCO 3.3.5	Table 3.5-1 Item 7 Note*
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	3.3.6	3.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.3.6	3.6
A3	CTS use the term containment vent to describe the containment penetration that includes pressure relief isolation valves PCV-1190, 1191, and 1192 and which is used to handle the normal pressure changes in the Containment during reactor power operation. FSAR 5.3.2.5 and CR labeling identify this system as the Containment Pressure Relief Line. ITS will use the term Containment Pressure Relief Line for this system to be consistent with FSAR 5.3.2.5 and CR labeling. This is an equivalent administrative change with no adverse effect on safety since there is no change to the existing requirements.	3.3.6	3.6 3.8 Table 4.1-1 4.13
A4	The RAs for ITS 3.3.6, are preceded by a Note that specifies: "Separate Condition entry is allowed for each channel." This allowance provides explicit recognition that the ITS allow completely separate re-entry into any Condition for each train and/or channel addressed by the Condition. This includes separate tracking of CT based on this re-entry. This allowance is consistent with an unstated assumption in the CTS. Thus, the addition of this Note is an equivalent administrative change with no effect on safety.	3.3.6 RAs Note	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS imply that both the Containment Building Vent and Purge System actuation instrumentation must be operable during refueling and above cold shutdown. ITS clarify the Applicability requirements for the Containment Purge System isolation and the Containment Pressure Relief Line isolation as follows: In Modes 1 through 4, Containment Purge System automatic isolation capability is not required since the Containment Purge System is isolated according to requirements. During core alterations or irradiated fuel movement in the containment, Containment Purge System automatic isolation Functions 1 and 2 must be operable to ensure Containment Purge System isolation in response to a fuel handling accident. In Modes 1 through 4, Containment Pressure Relief Line automatic isolation Functions 1 and 3 are required as part of the containment isolation function initiated by ESFAS Instrumentation required by LCO 3.3.2. Containment Pressure Relief Line automatic isolation Function 2 is required as backup to the closure initiated by the ESFAS system. During core alterations or irradiated fuel movement in the containment, Containment Pressure Relief Line automatic isolation capability is not required since the Containment Pressure Relief Line is isolated as specified in LCO 3.9.3. This clarification shows that both the Containment Purge System isolation and the Containment Pressure Relief Line isolation function must be operable at all times or the affected isolation valves must be shut. This is an equivalent administrative change with no adverse safety effect since it is consistent with current practice and interpretation of the CTS requirement.</p>	<p>LCO 3.3.2 3.3.6 LCO 3.6.3 LCO 3.9.3</p>	<p>Table 3.5-4 Item 4 3.8.C.8</p>
A6	<p>CTS require that all containment vent and purge valves be closed immediately if the required channel is not operable. LCO 3.3.6, RAs B.1 and C.1, maintain this requirement by directing entry into the Conditions and RAs for an inoperable isolation valve if the isolation actuation instrumentation is not operable. This is an equivalent administrative change with no adverse safety effect since it is consistent with current practice and interpretation of the CTS requirement.</p>	<p>LCO 3.3.6 RAs B.1 LCO 3.3.6 RAs C.1</p>	<p>Table 3.5-4 Item 4</p>
ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS)			
Discussion of Change	Summary of Change	ITS Section	CTS Section

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.3.7	3.3
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.3.7	3.3
A3	CTS require that the CRVS be operable in Modes 1 through 4. ITS add requirements for associated actuation instrumentation. CRVS design provides CRVS actuation to the incident mode with outside air makeup based on manual actuation of the CRVS mode selector switch, a safety injection signal or high radiation in the CR, but actuation of Radiation Monitor R-1 is not included in TS since isolation of the CR is not required to maintain radiation exposure within General Design Criteria 19 limits following a fuel handling accident or gas decay tank rupture. Thus, CRVS actuation on an SI signal provides the required actuation signal. Adding requirements for CRVS actuation instrumentation is an equivalent administrative change with no adverse safety effect since it is an explicit statement of a reasonable interpretation of the existing requirement.	LCO 3.3.7	3.3.H.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS 3.3.H.1 requires that the control room ventilation system be operable at all times when containment integrity is required. ITS LCO 3.7.11, CR Ventilation System (CRVS), and ITS 3.3.7, CRVS Actuation Instrumentation, are applicable during Modes 1, 2, 3, and 4 (i.e., above cold shutdown). This is an administrative change with no impact on safety because there is no change to the existing requirements. This Applicability is acceptable based on a determination that isolation of the control room is not required for maintaining radiation exposure within General Design Criteria 19 limits following a fuel handling accident or gas decay tank rupture. Thus, the CR ventilation system is not required to be operable in Modes 5 and 6, and during movement of irradiated fuel assemblies and core alterations.</p>	<p>3.3.7 LCO 3.7.11</p>	<p>3.3.H.1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.3.8 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS) ACTUATION INSTRUMENTATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.3.8	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.3.8	3.8
A3	CTS 3.8.A.12 and 3.8.C.6 require that the fuel storage building emergency ventilation system be Operable whenever irradiated fuel is being handled within the fuel storage building. Although there is no explicit requirement for the Operability of the associated actuation instrumentation, CTS Table 4.4-1, Item 15.a, requires periodic verification of the fuel storage building area radiation monitor, R-5, which provides automatic actuation of the fuel storage building emergency ventilation system. LCO 3.7.13, Fuel Storage Building Emergency Ventilation System, maintains the requirement for FSBEVS Operability and LCO 3.3.8, Fuel Storage Building Emergency Ventilation System (FSBEVS) Actuation Instrumentation, is added to establish an explicit requirement for the Operability of the manual and automatic actuation instrumentation for the FSBEVS. This is an administrative change with no adverse impact of safety because it is an explicit statement of a reasonable interpretation of the existing requirement.	3.8.A.12 3.8.C.6 LCO 3.7.13 LCO 3.3.8	Table 4.4-1 Item 15.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS 3.8.A establishes requirements for fuel handling operations both in the containment and in the fuel storage building. CTS 3.8.B specifies that if any of these requirements are not met, then refueling shall cease until the specified limits are met, and no operations which may increase the reactivity of the core shall be made. ITS LCO 3.3.8, Required Action A.1.2, which applies to the FSBEVS only, maintains the requirement to stop handling of irradiated fuel in the FSB. However, the requirement to halt operations which may increase the reactivity of the core is retained in the appropriate specifications of Section 3.9, Refueling Operations. This change is acceptable because FSBEVS Operability is not assumed in the analysis of a fuel handling accident in containment. This is an administrative change with no adverse effect on safety because it is an explicit statement of a reasonable interpretation of the existing requirement.</p>	<p>LCO 3.3.8 RA A.1.2</p>	<p>3.8.A 3.8.B</p>

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.1	3.1.H
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.1	3.1.H
A3	This change specifies the same minimum RCS flow requirements as CTS, but does not specify that this minimum applies only when four RCPs are running. This is an equivalent administrative change.	LCO 3.4.1.c LCO 3.4.4	3.1.H.2
A4	CTS specify that if the RCS pressure, temperature, or flow limits are exceeded, then the SLs of TS 2.1 must be verified. It is unnecessary for the ITS to restate this existing SL requirement; it must met. This is an equivalent administrative change.	2.1 LCO 3.4.1 SL 2.1.1	3.1.H.4 3.1.H LCO 3.4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS require verification by "flow calculation" every 24 months that RCS total flow rate is within required limits. ITS SR 3.4.1.4 maintains this requirement except that the ITS specifies use of a precision calorimetric heat balance. This is an equivalent administrative change.	SR 3.4.1.4	4.3.B
A6	Superseded by CTS Amendment 191.		
A7	CTS limit the "maximum indicated" T_{avg} . ITS keep this limit on the RCS T_{avg} with a clarification in the ITS Bases that RCS average loop temperature is assumed to be the highest indicated value of the T_{avg} indicators, and this is the value that is compared to the acceptance criteria. This is an equivalent administrative change.	LCO 3.4.1.b SR 3.4.1.2	3.1.H.1.b
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.2	3.1.C
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.2	3.1.C

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.3	CTS require restoring T_{avg} to ≥ 540 °F within 15 minutes or being in hot shutdown within the following 15 minutes when T_{avg} is not within limits. Under the same conditions, ITS require being in Mode 2 with $K_{eff} < 1.0$ within 30 minutes. This is an equivalent administrative change.	LCO 3.4.2 Action A.1	3.1.C.3.a
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.3	3.1.B
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.3	3.1.B
A.3	CTS has requirements for RCS temperature and pressure and system heatup and cooldown rate limits, but does not specify when the requirements apply. ITS has an explicit statement that RCS temperature, pressure, and system heatup and cooldown rate limits apply at all times because violation could damage the pressure vessel for future use even if there is no fuel in the vessel. This is an equivalent administrative change.	LCO 3.4.3	3.1.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.4	CTS specify that RCS integrity tests are performed according to Section 4.3. This statement is not needed because the organization and format of the ITS eliminate the need for cross references. Thus, this is an equivalent administrative change.	None	4.3 3.1.B.5
A.5	CTS include the clarification that heatup and cooldown rates are "averaged over one hour" to ensure proper application of heatup and cooldown limits. Although this clarification is not in ITS LCO 3.4.3, the Bases for ITS SR 3.4.3.1 include the same clarification. Thus, this is an equivalent administrative change.	SR 3.4.3.1 Bases	3.1.B.1
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.4	3.1.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.4	3.1.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.3	The Facility Operating License prohibits operation at levels above P-7 with fewer than four reactor coolant loops in operation until safety analyses have been submitted, NRC approval granted, and the license amended. CTS require four RCPs in operation before withdrawal of control banks. This is more restrictive than the License. ITS keep the CTS requirement since it requires four RCPs Operable and in operation in Modes 1 and 2. The Facility Operating License requirement is not needed. Thus, this is an equivalent administrative change.	LCO 3.4.4	3.1.A.1.b.2 Facility Operating License DPR-64, paragraph 2.C (3),
A.4	Not used.		
A.5	Not used.		
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.5	3.1.A
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.5	3.1.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.3	CTS require reactor coolant pump (RCP) operation when RCS T _{avg} is > 350 °F but specify that the requirements apply only when electrical power is available to the RCPs, and as permitted during special plant evolutions. However, CTS do not have requirements for when electrical power is unavailable or for special plant evolutions. ITS do not have this exception to the LCO applicability. This is an equivalent administrative change.	LCO 3.4.5	3.1.A.1.b.1
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.6	3.1.A
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.6	3.1.A
A.3	CTS have requirements for decay heat removal when the RCS T _{avg} is > 200°F and < 350°F. CTS require that at least one RCP or one RHR pump be operating. CTS require that two pathways for decay heat removal be operable with the two pathways consisting of any combination of RHR pumps or RCPs. ITS have requirements equivalent with the CTS. This is an equivalent administrative change.	LCO 3.4.6	3.1.A.1.c 3.3.A.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.4	CTS specify that requirements for decay heat removal may be modified "as permitted during special plant evolutions." ITS does not have this exception. This is an equivalent administrative change.	3.4.6	3.1.A.1.c
A.5	CTS have requirements for starting RCPs when RCS temperature is below the low temperature overpressure protection (LTOP) arming temperature, ITS include surveillances that keep these allowances and requirements. Note 2 is added to ensure that LCO requirements are met prior to starting RCPs when in Mode 4. This is an equivalent administrative change.	LCO 3.4.6	3.1.A.1.h
A.6	CTS say that with < the required minimum combination of RCPs and RHR operable, the plant must initiate corrective action to return the required equipment to operable as soon as possible. Otherwise, if sufficient equipment is available, the plant must be in cold shutdown within a specified time. ITS set equivalent requirements by differentiating between conditions where sufficient equipment remains available to cool down to Mode 5 and situations where cooldown to Mode 5 may be prevented by non-functioning equipment. This is an equivalent administrative change.	3.4.6 LCO 3.4.6	3.3.A.6.d
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.7	3.1.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.7	3.1.A
A.3	CTS have requirements for decay heat removal when the RCS T_{avg} is < 200°F but not in refueling. CTS require at least one RHR pump in operation and two RHR pumps operable. ITS has requirements equivalent to the CTS requirements. This is an equivalent administrative change.	3.4.7 LCO 3.4.7	3.1.A.1.d 3.3.A.7
A.4	CTS specify that requirements for decay heat removal may be modified "as permitted during special plant evolutions." ITS does not have this exception to the LCO applicability. This is an equivalent administrative change.	3.4.7	3.1.A.1.d
A.5	CTS has requirements to start RCPs when RCS temperature is < the LTOP enable temperature. ITS include SRs that maintain these allowances and requirements. ITS LCO 3.4.7, Note 3, is added to ensure that ITS LCO 3.4.12 requirements are met prior to starting RCPs when in Mode 5. This is an equivalent administrative change.	LCO 3.4.12 LCO 3.4.7	3.1.A.1.h
A.6	CTS have decay heat removal requirements when the RCS T_{avg} is < 200°F but not in refueling. CTS do not explicitly distinguish between Mode 5 with loops filled and unfilled; however, with loops unfilled, a SG cannot remove decay heat. ITS has requirements equivalent to CTS requirements. The primary difference between ITS LCO 3.4.7 and 3.4.8 is that if the RCS loops are filled, then two filled SGs can be credited as an alternate method of decay heat removal in place of an RHR loop that is not operating. This is an equivalent administrative change.	LCO 3.4.7 LCO 3.4.8	3.1.A.1.d 3.3.A.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.8	3.1.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.8	3.1.A
A3	CTS have requirements for decay heat removal when RCS T_{avg} is $< 200^{\circ}\text{F}$ but not in refueling. CTS require at least one RHR pump in operation. CTS require two RHR pumps operable. ITS have requirements equivalent to CTS requirements. Thus, this is an equivalent administrative change.	LCO 3.4.8	3.1.A.1.d 3.3.A.7
A4	CTS specify that CTS requirements for decay heat removal may be modified "as permitted during special plant evolutions." ITS does not allow this exception. This is an equivalent administrative change.	LCO 3.4.8	3.1.A.1.d
A5	CTS have requirements for decay heat removal when RCS T_{avg} is $< 200^{\circ}\text{F}$ but not in refueling. CTS do not distinguish explicitly between Mode 5 with loops filled and Mode 5 with loops not filled; however, if loops are not filled, then a SG is not capable of removing decay heat. ITS have requirements equivalent to CTS requirements.	LCO 3.4.7 LCO 3.4.8	3.1.A.1.d 3.3.A.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.9 - PRESSURIZER			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.9	3.4
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.9	3.4
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES			
A.1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.10	3.1
A.2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.10	3.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A.3	<p>CTS set pressurizer code safety valve lift at 2,485 psig with $\pm 1\%$ error. ITS keep the LCO that pressurizer code safety valves must be set to $\pm 1\%$ of the nominal setpoint. However, ITS Bases clarify that the setpoint limit is $\pm 3\%$ of the nominal setpoint. The LCO is that the valves must be reset to $\pm 1\%$ of the nominal setpoint during the Surveillance to account for drift during the SR interval. Therefore, the setpoint is $\pm 3\%$ for operability; but, the valves must be reset to $\pm 1\%$ during the surveillance to account for drift. This is consistent with current practice, CTS interpretation, the safety analysis, and with the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, and is therefore an equivalent administrative change.</p>	<p>LCO 3.4.10 SR 3.4.10.1</p>	<p>3.1.A.2.c</p>
A4	<p>CTS specify that the safety valve setpoint test due May 1996 may be deferred until the next refueling outage but no later than May 31, 1997. This Note is outdated. Thus, this is an equivalent administrative change.</p>	<p>None</p>	<p>Table 4.1.3</p>
A5	<p>CTS specify that "all" pressurizer code safety valves must be operable with a corresponding statement in the CTS Bases regarding the capacity of the three pressurizer code safety valves. ITS require that three pressurizer code safety valves must be operable. Thus, this is an equivalent administrative change.</p>	<p>3.4.10</p>	<p>3.1.A.2.b</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.11	3.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.11	3.1
A3	CTS identify requirements for inoperable PORVs without identifying any completion time; therefore, the time to initiate action is assumed to be immediately in accordance with CTS 3.0. ITS LCO 3.4.11, Conditions A and B, establish similar requirements for inoperable PORVs but specify a 1-hour completion time. This is an equivalent administrative change with no effect on safety because the ITS completion time is a reasonable interpretation of the existing requirements based on plant operating experience that closure is accomplished within approximately 1 hour, when actions are initiated immediately.	LCO 3.4.11 Condition A LCO 3.4.11 Condition B LCO 3.0.4	3.1.A.4 3.1.A.4.a 3.0
A4	ITS provides the allowance that ITS LCO 3.0.4 is not applicable to PORVs and block valves. This allowance permits entry into Modes 1, 2, and 3 if one or both PORVs are inoperable but able to be cycled manually. Also, this allowance permits entry into Modes 1, 2, and 3 before performing the required cycling of the PORVs or block valves to verify their operability status. This is an equivalent administrative change.	LCO 3.4.11 LCO 3.0.4	None

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>ITS clarify that separate condition entry is allowed for each PORV. Both pressurizer PORVs and associated block valves are treated as separate entities, each with separate Completion Times. ITS provide more explicit instructions for proper application of the Actions for ITS compliance. ITS provide direction consistent with ITS Actions for inoperable PORVs or block valves. This change ensures a specified period of time to verify or restore compliance with requirements for each inoperable PORV or block valve. This is an equivalent administrative change with no safety effect because it is consistent with changes to the Conditions and associated RAs for PORVs and block valves being added by ITS.</p>	<p>LCO 3.4.11 Note 1 1.3</p>	<p>Table 4.1.1</p>
A6	<p>CTS Table 4.1-1, Item 14, Note 1, specifies that the requirement to cycle the block valve every quarter may be deferred until the next time the plant is in cold shutdown if the block valve is closed because of a leaking or inoperable PORV. ITS SR 3.4.11.1, Note, provides an equivalent allowance. Thus, this is an equivalent administrative change.</p>	<p>SR 3.4.11.1 Note</p>	<p>Table 4.1.1 Item 14 Note 1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.12	3.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.12	3.1
A3	CTS has requirements for the Overpressure Protection System (OPS) or an RCS vent when RCS temperature is $\leq 319^{\circ}\text{F}$; CTS limit RCP starting when RCS cold leg temperature is $\leq 319^{\circ}\text{F}$; and CTS 3.3.A.8 limits high head coolant injection when T_{cold} is $\leq 319^{\circ}\text{F}$. CTS also has requirements for limiting high head coolant injection when RHR is in service to protect the RHR system from overpressurization. ITS LCO 3.4.12 organizes and maintains these requirements.	LCO 3.4.12	3.1.A.8 3.3.A.8 3.1.A.1.h

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS has requirements for the OPS or an RCS vent when RCS temperature is ≤ 319 °F; CTS also limit RCP starting when RCS cold leg temperature is < 319 °F; and CTS limits high head coolant injection when T_{cold} is ≤ 319 °F or when RHR is in service. ITS sets Applicability for LTOP as Mode 4 when any RCS cold leg temperature is < 319 °F and in Modes 5 and 6 when the reactor vessel head is on. Also, ITS LCO 3.4.12 applies whenever RHR is not isolated from the RCS except that a Note to LCO 3.4.12.a and b excludes the requirements for OPS or an RCS vent when the all RCS cold leg temperatures are ≥ 319 °F. The ITS uses the more definitive statement that LTOP is required when any RCS cold leg temperatures is < 319 °F. This is an equivalent administrative change.</p>	<p>LCO 3.4.12 LCO 3.4.12.a, Note LCO 3.4.12.b, Note</p>	<p>3.1.A.8 3.3.A.8 3.1.A.1.h</p>
A5	<p>CTS has RCP starting prerequisites when an RCP is "started or jogged" if RCS temperature is ≤ 319 °F. ITS keep these RCP starting prerequisites. Also, the ITS include clarification that these requirements also apply when an RCP is jogged. This is an equivalent administrative change.</p>	<p>LCO 3.4.12 SR 3.4.12.8 SR 3.4.12.9</p>	<p>3.1.A.1.h</p>
A6	<p>CTS uses the term "armed" in conjunction with the term "operable" to establish the required status of the OPS. CTS Bases explain that "arming" means that the motor operated block valve associated with each PORV is in the open position. The OPS is "armed" if the block valve is either opened automatically by the OPS when the RCS temperature is < 319 °F or opened manually by the control room operator. ITS keep the requirement that the motor operated block valve associated with each PORV must be open for OPS to be operable; however, the term "armed" is not used to describe this condition. ITS also require verification that each block valve is open as a condition of operability of the OPS. This is an equivalent administrative change.</p>	<p>3.4.12 SR 3.4.12.5</p>	<p>3.1.A.8.a.1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS allow 2 HHSI pumps to be aligned to the RCS and energized if restrictions on RCS vent size and/or pressurizer level are met. However, this allowance applies only when RCS temperature is < 200°F. ITS keep the allowance, but do not restrict it to only when RCS temperature is < 200 °F. CTS also require that if the PORVs or the RCS vent are used to mitigate an RCS pressure transient, then a special report be submitted to the NRC within 30 days. ITS do not require a report if the PORVs or the RCS vent are used to mitigate an RCS pressure transient. This is an equivalent administrative change.</p>	LCO 3.4.12	<p>3.3.A.8 3.3.A.10 6.9.2.j 6.9.2 3.1.A.8.d</p>
A8	<p>CTS require that if the PORVs or the RCS vent mitigate an RCS pressure transient, then a special report be submitted to the NRC within 30 days. CTS 6.9.2 is a list of the special reports that must be submitted to the NRC for a variety of activities or events identified in the CTS. ITS does not require a report if the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient. This is an equivalent administrative change.</p>	3.4.12	<p>3.1.A.8.d 6.9.2 6.9.2.j</p>
A9	<p>CTS have several options for Actions for failure to meet LTOP requirements because of a loss of redundancy or loss of function for the OPS. However, no Actions are provided if LTOP requirements are not met for other reasons. ITS require that the RCS be depressurized and a vent path ≥ 2.00 square inches be established within 8 hours when LTOP requirements are not met for reasons other than those identified as LCO 3.4.12 Conditions. This is an equivalent administrative change.</p>	LCO 3.4.12	3.1.A.8.c

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	CTS require a daily channel check of the OPS. ITS keep the requirement to do a Channel Check of the OPS instrument channels every 24 hours. However, ITS SR 3.4.12.4 is modified by a Note that includes an explicit statement that Channel Checks of OPS instrument channels are required only if the OPS is being used to satisfy LTOP requirements. This is an equivalent administrative change.	SR 3.4.12.4 Note	Table 4.1-1, Item 38
A11	CTS specify that no safety injection (HHSI) pump shall be “energized and aligned” to feed the RCS when LTOP is required. The equivalent ITS specifies that no HHSI pump shall be “capable of injecting into the RCS” when LTOP is required. This is an equivalent administrative change.	LCO 3.4.12	3.3.A.8
ITS SECTION 3.4.13 RCS OPERATIONAL LEAKAGE			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.13	3.1.F
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.13	3.1.F

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS have limits for unidentified and total RCS leakage and specify that these limits do not apply to controlled leakage sources such as the RCP controlled leakage seals and leakage into closed systems. The definition of "Leakage" in ITS defines leakage so that ITS LCO 3.4.13 limits do not apply to controlled leakage sources such as the RCP controlled leakage seals and leakage into closed systems. The ITS Bases also clarify these exceptions to RCS leakage limits. This is an equivalent administrative change.</p>	<p>1.0 3.4.13 3.4.14</p>	<p>3.1.F.3 3.1.F.2 3.1.F.3</p>
A4	<p>CTS specify that the reactor shall not be restarted following a shutdown required for exceeding specified limits for RCS leakage until the problem is corrected. ITS do not include an explicit statement of this requirement. This is an equivalent administrative change.</p>	<p>LCO 3.4.13 LCO 3.0.4</p>	<p>3.1.F.6</p>
A5	<p>CTS require a SG Tube Inspection Program. The equivalent ITS keeps this requirement, but add SR 3.4.13.2 to require that SG tube integrity be verified to be in accord with the SG Tube Surveillance Program. This is an equivalent administrative change.</p>	<p>5.5.8 SR 3.4.13.2</p>	<p>4.9</p>
A6	<p>CTS do not include an explicit statement of when the limits for RCS leakage apply, but they have an implied Applicability by requiring the plant placed in cold shutdown if limits are not met. ITS establish the Applicability for RCS leakage rate limits as Modes 1, 2, 3, and 4. This is an equivalent administrative change.</p>	<p>LCO 3.4.13</p>	<p>3.1.F.2 3.1.F.4 3.1.F.5 3.1.F</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	CTS Table 4.1-3, Item 7, requires periodic evaluation of primary system leakage. ITS SR 3.4.13.1 maintains this requirement except that the SR 3.4.13.1 specifies this evaluation is performed using an RCS water inventory balance. This is an equivalent administrative change with no effect on safety because ITS SR 3.4.13.1 provides an explicit statement of a reasonable interpretation of the existing requirement.	SR 3.4.13.1	Table 4.1-3, Item 7
A8	CTS say that if water inventory balance, monitoring equipment, or direct observation indicate reactor coolant leakage, then an evaluation of the safety implications shall be initiated within four hours. Any indicated leak shall be considered to be real until it is determined that the indicated leak cannot be substantiated. Also, CTS specify that operation may continue only if this evaluation determines continued operation is safe and leakage limits are not exceeded. While the analysis is implied in the ITS, the limits are explicitly stated and consistent with CTS interpretation. This is an equivalent administrative change.	LCO 3.4.13	3.1.F.1 3.1.F.3
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.14	4.5
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.14	4.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS set requirements to leak test RCS pressure isolation valves (PIVs) and to test the RHR System autoclosure Interlocks (ACI) and open permissive interlocks (OPI) function, but have no applicability statement. The equivalent ITS keep these requirements and also add an Applicability statement that the requirements must be met in Modes 1, 2, 3, and 4. The Applicability statement for LCO 3.4.14 requires the PIVs to be pressure isolation barriers when the plant is > 200°F. This is an equivalent administrative change.</p>	LCO 3.4.14	<p>4.5.B.2.c 4.5.B.2.d Table 4.1-3</p>
A4	<p>CTS set requirements to leak test RCS PIVs. The equivalent ITS keep these requirements and add two new Notes for clarification. This is an equivalent administrative change.</p>	<p>LCO 3.4.14 LCO 3.4.14, Note 1 LCO 3.4.14, Note 3 1.3</p>	<p>4.5.B.2.c 4.5.B.2.d</p>
A5	<p>CTS require gross leakage testing for selected PIVs following maintenance, repair, or other work that could unseat check valves. ITS does not require this because ITS SR 3.4.14.1 requires leakage testing within 24 hours following valve actuation due to automatic or manual action or flow through the valve. Also, ITS SR 3.0.1 requires that SRs be met when equipment is required to be operable. The Bases for SR 3.0.1 clarification that following maintenance, appropriate testing is required to declare equipment operable. This includes ensuring applicable Surveillances are not failed. This is an equivalent administrative change.</p>	<p>SR 3.0.1 SR 3.4.14.1</p>	4.5.B.2.d
<p>ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION</p>			

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.15	3.1.F
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.15	3.1.F
A3	ITS LCO 3.4.15, Actions Note, is added to provide an allowance that ITS LCO 3.0.4 is not applicable to RCS Leakage Detection Instrumentation. This is an equivalent administrative change.	LCO 3.4.15 Actions Note LCO 3.0.4	None
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.4.16	LCO 3.5.1 LCO 3.0.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.4.16	LCO 3.5.1
A3	The change in the ITS 3.5.1, RA D.1, completion time to reach Mode 3 in 7 hours is equivalent to the change introduced by ITS 3.5.1, RA B.1. The change in the ITS 3.5.1, RA D.1 is equivalent to the change introduced by ITS 3.5.1, RA C.2.	3.5.1, RA B.1 3.5.1 RA C.2 3.5.1, RA D.1	3.3.A.5.a
A4	CTS specify that the reactor be brought to hot shutdown immediately with $T_{avg} \leq 500$ °F using normal operating procedures for failure to meet specific activity limits. Under the same conditions, the equivalent ITS specify the completion time to be in Mode 3 with $T_{avg} < 500$ °F as within 6 hours, with the accepted practice that actions commence immediately. This is an equivalent administrative change.	3.4.16	3.1.D.3 3.1.D.4
A5	CTS establish primary coolant activity levels in units of $\mu\text{Ci/cc}$ for both Dose Equivalent I-131 and gross specific activity. ITS keep the same numerical limits but express them in units of $\mu\text{Ci/g}$. This is an equivalent administrative change.	LCO 3.4.16	3.1.D.1
A6	CTS limit primary coolant activity when the reactor is critical or average RCS temperature is > 500 °F. The equivalent ITS limit primary coolant activity in Modes 1 and 2, and in Mode 3 with RCS average temperature ≥ 500 °F. However, minimum temperature for criticality limits significantly > 500 °F ensures that CTS primary coolant activity requirements apply before the CTS allow the reactor to be put in a status equivalent to ITS Mode 2. Thus, CTS and ITS requirements are identical. This is an equivalent administrative change.	LCO 3.4.16 SR 3.4.16.2	3.1.D.1 3.1.D.1.a Table 4.1-2, Item 1 1.15

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS have an LCO limit for Dose Equivalent Iodine-131. They specify that Dose Equivalent I-131 is that concentration of I-131 which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. ITS also set an LCO limit for Dose Equivalent Iodine-131. ITS 1.0 says that, Dose Equivalent I-131 is that concentration of I-131 that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. This is an equivalent administrative change.</p>	<p>SR 3.4.16.2 1.0</p>	<p>3.1.D.1.a</p>

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.1 - ACCUMULATORS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.5.1	3.3.A 4.5.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.5.1	3.3.A
A3	Not used.		

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS specify that if requirements are not met for one or more ECCS accumulators, then the reactor must be in hot shutdown within four hours and cold shutdown within the following 24. ITS keep the requirement to initiate shutdown within one hour if one accumulator is inoperable, but add a required action (RA) to enter LCO 3.0.3 if two or more accumulators are inoperable. Thus, adding a specific requirement to enter LCO 3.0.3 and place the plant in a condition in which the accumulators are not required whenever the plant is outside the accident analysis is an administrative change with no significant adverse effect on safety.</p>	<p>LCO 3.0.3</p> <p>3.5.1 Condition B</p> <p>3.5.1 Condition C</p> <p>3.5.1 RA D.1</p> <p>3.5.1 RA B.1</p> <p>3.5.1 RA C.2</p>	3.3.A.5
A5	<p>CTS require ECCS accumulators operable when > 350 °F; and CTS also require accumulator isolation valves open only when RCS pressure is > 1000 psig. Thus, the CTS Applicability for ECCS accumulators is RCS temperature > 350 °F and RCS pressure > 1000 psig. ITS keep this Applicability. The improved presentation of Applicability requirements for ECCS accumulators is an administrative change with no effect on safety.</p>	LCO 3.5.1 Applicability	3.3.A.3.c 3.3.A.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.5.2	3.3.A 4.5.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.5.2	3.3.A
A3	CTS state that a test SI signal will be applied to initiate operation of the SI system for the system test performed every 24 months. The equivalent ITS allow the use of either an actual or simulated actuation signal to verify valve actuation and pump start on receipt of a safety injection actuation signal. This change is acceptable because use of an actual instead of a simulated or test signal will not affect the performance of the test because the equipment being tested cannot discriminate between an actual or simulated signal.	SR 3.5.2.4 SR 3.5.2.5	4.5.A.1.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS allow one SI pump or one RHR pump to be OOS for a specified time. They also allow one RHR heat exchanger to be OOS for a specified time. CTS allow any valve required for the functioning of the SI and RHR systems during and following an accident to be inoperable for a specified time provided all valves in the system that provide a duplicate function are operable. CTS does not have an AOT for the recirculation pumps. Under the same conditions, the equivalent ITS allow one or more trains to be inoperable with a specified allowable OOS time provided at least 100% of the ECCS flow equivalent to two HHSI pumps, one RHR pump, and one Containment Recirculation pump is available. This change is equivalent to the CTS approach. The change in presentation is administrative.</p>	3.5.2 Condition A	3.3.A.4.c 3.3.A.4.d 3.3.A.4.e
A5	<p>CTS have requirements for a functional test of the ECCS subsystems and include the statement that the SI and RHR pumps are made inoperable for this test. This statement is not needed because ITS includes appropriate controls and guidance for the determination of system Operability during testing. This is an administrative change with no adverse effect on safety.</p>	None	4.5.A.1.a
A6	<p>CTS require surveillances as part of post maintenance testing of specified ECCS pumps and valves. ITS do not include this requirement because ITS require that SRs are met whenever equipment is required to be operable. Therefore, CTS statements establishing requirements to verify SRs are met following maintenance are not needed.</p>	SR 3.0.1 SR 3.0.1 Bases	4.5.A.1.c 4.5.A.1.d

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS establish Applicability for ECCS systems as whenever RCS temperature is > 350 °F. However, when requirements are not met, CTS require that the plant proceed to cold shutdown. ITS keep the requirement to have ECCS systems operable above 350 °F. However, when requirements are not met, ITS require that the plant be placed in Mode 4. Temperature <350 °F is equivalent to Mode 4. This change is needed to establish consistency between the LCO Applicability and the associated Required Actions. This is an administrative change with no effect on safety.</p>	3.5.2 Condition B	3.3.A.3 3.3.A.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.5.3	3.3.A 4.5.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.5.3	3.3.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require at least one RHR subsystem operable for ECCS injection in Mode 4. ITS keeps this requirement, but ITS LCO 3.5.3 is modified by a Note that allows an RHR subsystem to be considered operable for the ECCS initiation function during alignment and operation for decay heat removal and valve testing if the RHR subsystem can be realigned manually to the ECCS mode and is not otherwise inoperable. Although this allowance is not specifically stated in CTS, the CTS requirements imply that an RHR pump can satisfy both the ECCs and decay heat removal requirements concurrently and CTS do not require operability of ECCS automatic initiation functions in Mode 4. Thus, the ITS is consistent with CTS current practice and intent.</p>	LCO 3.5.3	<p>3.3.A.1.c</p> <p>3.3</p> <p>3.3.A.6.a</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)			
A1	Revised numbering and reformatting in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431 and adopted certain plant specific wording preferences or conventions. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis.	3.5.1	3.3.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.5.1	3.3.A
A3	CTS define the Applicability and establish requirements for the RWST when T_{avg} is $> 200^{\circ}\text{F}$. CTS also define the Applicability and set identical requirements for the RWST whenever T_{avg} is $> 350^{\circ}\text{F}$. ITS keep the same Applicability for the RWST as Modes 1, 2, 3, and 4. This is an administrative change with no effect on safety.	LCO 3.5.4	3.3.A.3

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.6 - CONTAINMENT SYSTEMS

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.1 - CONTAINMENT			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.1	1.10 3.6.A 4.4.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.1	3.6 4.4
A3	CTS specifies that containment integrity, which exists when isolation valves, air locks, and the equipment hatch are set to maintain leak tightness, is necessary. In addition, CTS requires that visual examinations and containment leakage rates adhere to the Containment Leakage Rate Testing Program. The equivalent ITS keep these requirements by dividing containment operability requirements into four separate LCOs. In conjunction with this change, the CTS definition of Containment Integrity is not needed. This is an equivalent administrative change with no effect on safety.	3.6.1 3.6.2 3.6.3 3.6.9	1.10 3.6.A.1 4.4.A

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A4	CTS specifies the Applicability for containment Integrity as whenever the reactor is above cold shutdown. The equivalent ITS keeps this Applicability by requiring that Containment be Operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.6.1 Applicability	3.6.A.1 3.6.A.3
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.2	1.10 3.6.A 4.4.D
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.2	3.6 4.4
A3	CTS specifies that containment integrity not be violated. CTS 1.10.3 specifies that both doors in each personnel air lock be "properly closed," and that the air lock may be used for entry, egress, or maintenance, at which time at least one door shall be closed. ITS keep these requirements and clarifies that two air locks must be Operable. Also, ITS clarifies the ambiguous term "properly closed." ITS keep all existing requirements by dividing the containment Operability requirements into four LCOs: 3.6.1, 3.6.2, 3.6.3, and, 3.6.9 requiring that IVSW be Operable. The CTS definition of Containment Integrity is not needed. This is an equivalent administrative change with no effect on safety.	3.6.2	1.10.3 3.6.A.1

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A4	<p>CTS specifies the Applicability for containment integrity as whenever the reactor is above cold shutdown. ITS keeps this Applicability by requiring that Containment be operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.</p>	<p>3.6.2 Applicability</p>	<p>3.6.A.1 3.6.A.3</p>
A5	<p>CTS specifies that if the containment integrity requirements are not met, then containment integrity shall be restored within one hour. ITS 3.6.2, Required Actions A.1, B.1, and C.2, require verification within one hour that at least one door in the affected air lock is closed. Verification that at least one air lock door is closed ensures that containment integrity is restored. This is an equivalent administrative change with no effect on safety.</p>	<p>3.6.2, RA A.1 3.6.2, RA B.1 3.6.2, RA C.2</p>	<p>3.6.A.3</p>
A6	<p>The Actions for ITS 3.6.2 are preceded by a Note that specifies: "Separate Condition entry is allowed for each air lock." This allowance provides explicit recognition that the ITS is designed to allow completely separate re-entry into any Condition for each air lock addressed by the Condition including separate tracking of Completion Times based on this re-entry. This is consistent with the intent of the CTS. This is an administrative change with no effect on safety.</p>	<p>3.6.2 Actions Note 2</p>	<p>3.6.A</p>
A7	<p>The Actions for ITS 3.6.2 are preceded by a Note (3) that clarifies that the applicable Conditions and Required Actions of LCO 3.6.1 are applicable when air lock leakage results in exceeding the overall containment leakage rate. This clarification is not needed in CTS 3.6.A because CTS 3.6.A requirements and associated Actions apply to the containment, the air locks and the containment isolation valves. This clarification is needed in ITS because the ITS uses separate LCOs for the containment (LCO 3.6.1), airlocks (LCO 3.6.2), and containment isolation valves (LCO 3.6.3). This is an equivalent administrative change with no effect on safety because there is no change to the existing requirements.</p>	<p>LCO 3.6.1 3.6.2 3.6.3</p>	<p>3.6.A</p>

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A8	ITS LCO 3.6.2, Required Actions A.1 and B.1 are modified by a Note directing that the RAs do not apply if both doors in the same air lock are inoperable and Condition C is entered. This is consistent with the intent of the CTS. This is an equivalent administrative change with no effect on safety.	LCO 3.6.2, RA A.1 Note LCO 3.6.2 RA B.1 Note	3.6.A
A9	CTS 4.4.D requires that air locks be tested in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 maintains this requirement with additional guidance provided in SR 3.6.2.1, Note 2. SR 3.6.2.1 ensures that acceptance criteria for air lock testing, listed in the ITS 5.5.15, Containment Leakage Rate Testing Program, is met. SR 3.6.2.1, Note 2, is added to ensure that air lock leakage is also included in determining the overall containment leakage rate which is determined by ITS SR 3.6.1.1. This is an administrative change with no impact on safety because it is a clarification that ensures proper interpretation of the existing requirements.	SR 3.6.2.1 SR 3.6.2.1 Note 2	4.4.D
A10	CTS 4.4.D requires that air locks be tested according to the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 maintains this requirement with additional guidance in ITS SR 3.6.2.1, Note 1. This Note specifies that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is consistent with the intent of the CTS. This is an equivalent administrative change with no effect on safety.	SR 3.6.2.1 SR 3.6.2.1 Note 1	4.4.D
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES			

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.3	1.10 3.6.A 3.6.D 4.4.E 4.13.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.3	3.6 4.4 4.13
A3	CTS specifies that containment integrity shall not be violated, and, that non-automatic containment isolation valves not required to be open during accident conditions must be closed and blind flanges installed where required and automatic containment isolation valves are either Operable or in the closed position or isolated by a closed manual valve or flange. The equivalent ITS keeps the identical requirements by specifying that each containment isolation valve must be Operable with Operability described in the Bases. In conjunction with this change, the CTS definition of Containment Integrity is not needed. This is an equivalent administrative change with no effect on safety.	3.6.3	1.10 1.10.1 1.10.4 3.6.A.1
A4	CTS specifies the Applicability for containment isolation valves as whenever the reactor is above cold shutdown. ITS keeps this Applicability by requiring that containment isolation valves be Operable in Modes 1, 2, 3 and 4. This is an equivalent administrative change with no effect on safety.	3.6.3 Applicability	3.6.A.1 3.6.A.3 3.6.D 4.13

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A5	<p>ITS 3.6.3, Actions Note 4, is added to require entry into applicable Conditions and Required Actions of LCO 3.6.1, Containment, when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria. This change is needed because in CTS the Actions associated with any LCO not met must be taken. However, ITS LCO 3.0.6 specifically states that it is not necessary to enter into the supported system's (i.e., containment) Conditions and Required Actions unless directed to do so by the support system's (i.e., containment isolation valve) Required Actions. Without this note, ITS 3.6.3 could allow plant operation to continue with containment isolation valves with excessive leakage if ITS 3.6.3 Required Actions are completed even if these Actions did not ensure that the safety function of the valves is met. This is an administrative change with no impact on safety because only with the addition of this note will the ITS maintain the CTS requirement for plant shutdown when excessive valve leakage in one or more containment isolation valve results in exceeding Technical Specification limits for overall containment leakage.</p>	<p>LCO 3.6.1 LCO 3.0.6 3.6.3 Actions Note 4</p>	3.6
A6	Not Used.		
A7	<p>ITS requires entry into applicable Conditions and RAs for systems made inoperable by CIVs. A Note is added to the Actions to eliminate ambiguity concerning the applicability of ITS LCO 3.0.6 when CIVs render another system inoperable. ITS LCO 3.0.6 specifies that the Conditions and RAs associated with a supported system are not required to be entered when a supported system LCO is not met. Only the support system LCO RAs are required to be entered. Without the addition of ITS 3.6.3, Actions Note 3, ambiguity could exist as to the need to enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves that must be closed to satisfy containment isolation requirements. This is consistent with the intent of the CTS.</p>	<p>LCO 3.0.6 3.6.3 Actions Note 3</p>	3.6

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A8	<p>ITS 3.6.3, Conditions A, B, and C, are preceded by Notes identifying the containment isolation valve configuration for which the Condition is applicable. The addition of these Notes does not eliminate any existing requirements or establish any new requirements and the Notes provide direction for the proper use of the LCO. This reorganization of requirements is an equivalent administrative change with no safety effect except for the specific changes identified and justified in the discussion of changes for each ITS LCO 3.6.3 Conditions and Required Action.</p>	<p>3.6.3 Condition A</p> <p>3.6.3 Condition B</p> <p>3.6.3 Condition C</p>	3.6
A9	Not used.		
A10	<p>According to 10 CFR 50, Appendix A, Criterion 56, containment integrity requires one automatic isolation valve inside and one automatic isolation valve outside containment with the option of allowing one closed isolation valve for either or both of the automatic isolation valves such that the design maintains the ability to tolerate a single failure. Criterion 56 also allows other configurations that are acceptable on some other defined basis. ITS LCO 3.6.3 recognizes that one automatic isolation valve and the associated closed system inside containment constitute a single failure tolerant containment isolation boundary. This is an equivalent administrative change with no effect on safety.</p>	3.6.3 Actions	1.10.4 3.6.A.3
A11	<p>CTS uses the term containment vent to describe the containment penetration that includes pressure relief isolation valves PCV-1190,1191, and 1192 and which handles the normal pressure changes in the Containment during operation. FSAR 5.3.2.5 and control room labeling identify this system as the Containment Pressure Relief Line. The equivalent ITS uses the term Containment Pressure Relief Line for this system to be consistent with FSAR 5.3.2.5 and control room labeling. This is an equivalent administrative change with no effect on safety.</p>	3.6.3	3.6.D 4.13
A12	Superceded by Amendment 195.		

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A13	<p>ITS 3.6.3, Actions Note 5, is added to direct entry into applicable Conditions and Required Actions of ITS 3.6.9 when required IVSW supply to a penetration flowpath is isolated. ITS 3.6.3, Actions Note 6, is added to direct entry into applicable Conditions and Required Actions of ITS 3.6.10 when required IVSW supply to a penetration flowpath is isolated. This is an equivalent administrative change with no effect on safety.</p>	<p>3.6.3 Actions Note 5</p> <p>3.6.3 Actions Note 6</p> <p>3.6.9</p> <p>3.6.10</p>	3.6
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.</p>	3.6.4	3.6.B
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.</p>	3.6.4	3.6
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE			

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.5	3.6.C
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS. This is an equivalent administrative change with no effect on safety.	3.6.5	3.6
A3	CTS specifies the Applicability for containment temperature limits as whenever the reactor is above cold shutdown. ITS keeps this Applicability by requiring that Containment temperature be within specified limits in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.6.5 Applicability	3.6.C.1 3.6.C.2

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.6	3.3.B 4.5.A.2 4.5.A.4 4.5.B.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.6	3.3
A3	CTS sets requirements for the Containment Cooling and Iodine Removal Systems which consist of two trains of containment spray and five fan cooler units (FCUs). The equivalent ITS keep these requirements. However, the LCO name is changed to Containment Spray System and Containment Fan Cooler System. Also, requirements for the five FCUs are established by grouping the five FCUs into three trains based on the safeguards power train needed to support operability of the FCU. This is an equivalent administrative change with no effect on safety.	LCO 3.6.6	3.3.B
A4	CTS specifies the Applicability for the Containment Cooling and Iodine Removal Systems as whenever the reactor is above cold shutdown. ITS keep this Applicability by requiring that Containment be Operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.6.6 Applicability	3.3.B

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A5	<p>CTS does not include explicit requirements if the combination of inoperable FCUs and/or inoperable containment spray trains result in < the minimum functional capability assumed in the accident analysis; therefore, CTS would require an immediate plant shutdown. This condition would exist if two containment spray trains or three or more trains of spray trains and/or fan cooler trains are inoperable. Under the same conditions, the equivalent ITS require immediate entry into LCO 3.0.3. This is an equivalent administrative change with no effect on safety.</p>	<p>LCO 3.0.3 LCO 3.6.6</p>	<p>3.3.B 3.0</p>
A6	<p>CTS includes requirements for the inspection and testing of the containment fan cooler air filtration system. The equivalent ITS keeps these requirements as part of a TS program governing the testing of all ventilation filter systems governed by the ITS. ITS SR 3.6.6.8 is added to establish completion of the VFTP as a requirement for the Operability of the containment fan cooler. This is an equivalent administrative change with no effect on safety.</p>	<p>SR 3.6.6.8 5.5.10</p>	<p>4.5.4.a 4.5.4.b 4.5.4.c</p>
A7	Not used.		
A8	Not used.		
A9	Not used.		
A10	<p>CTS provide an AOT for one inoperable containment spray pump and CTS 3.3.B.2.c establishes an AOT of 24 hours for any valve required for the functioning of the system. Under ITS LCO 3.6.6, requirements are established on the basis of containment spray trains and a train is considered inoperable if either a pump or a valve associated with that pump is inoperable. This is an equivalent administrative change with no effect on safety.</p>	<p>LCO 3.6.6 3.6.6 Actions</p>	<p>3.3.B.2.b 3.3.B.2.c</p>
A11	Not used.		

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A12	<p>CTS requires that the containment spray pumps be started every quarter. ITS keep the same requirement except that the SR Frequency is established by the Inservice Testing Program. Since the Frequencies are the same, this is an equivalent administrative change with no effect on safety.</p>	SR 3.6.6.4	4.5.B

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.7	3.3.B 4.5.A.2 4.5.B.2
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.7	3.3
A3	CTS 3.3.B.1 specifies the Applicability for containment cooling and iodine removal systems as whenever the reactor is above cold shutdown. ITS 3.6.7 maintains this Applicability by requiring that the Spray Additive System be Operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety because there is no change to the CTS Applicability.	3.6.7 Applicability	3.3.B.1
A4	Not used.		
A5	Not used.		
A6	Not used.		

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A7 (was M2)	<p>CTS 3.3.B.3 establishes the Actions required if the Spray Additive System is not restored to meet CTS requirements within specified completion times.</p> <p>CTS 3.3.B.3.a specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown (Mode 3) within 4 hours and cold shutdown (Mode 5) within the following 24 hours. However, if the reactor is subcritical when requirements are not met, CTS 3.3.B.3.b requires only that reactor coolant system temperature and pressure not be increased more than 25°F and 100 psi, respectively, over existing values with the requirement to proceed to cold shutdown (Mode 5) deferred by 48 hours. The CTS markup shows CTS 3.3.B.3.b as being deleted. The deletion is justified as a more restrictive change and states that under the same condition stated above, ITS 3.6.7 Required Actions B.1 and B.2 require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours (Required Action B.2) regardless of the status of the unit when the condition is identified. The allowance of 48 hours provided in CTS 3.3.B.3.b is deleted. This justification is not entirely correct. The statement implies that if the Spray Additive System is determined to be inoperable while in Mode 3, then an immediate shutdown is commenced such that Mode 5 is reached within 84 hours. The CTS for this type of condition would allow 24 hours to restore the systems to Operable status before entering CTS 3.3.B.3.b where an additional 48 hours would be allowed before shutting down to Mode 5. In the ITS for this condition, ITS Action A would be entered first. If the system could not be restored to Operable status within the specified Completion Time of this Action, then ITS 3.6.7 Action B would be entered. Under this scenario the changes associated with CTS 3.3.B.3.b would be an Administrative change for the Spray Additive System (CTS: 24 + 48 = 72 hours, to ITS of 72 hours).</p>	3.6.7 Actions	3.3.B.3 3.3.B.3.a 3.3.B.3.b

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.8	3.3.I 4.5.A.7
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.8	3.3
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.9	3.3.C 4.4.E.2
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.9	3.3

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A3	<p>CTS 3.3.C.1 establishes the Applicability for the Isolation Valve Seal Water (IVSW) System as whenever the reactor is above cold shutdown. ITS 3.6.9 maintains this Applicability by requiring that IVSW is Operable in Modes 1, 2, 3 and 4. This is an equivalent administrative change with no effect on safety because there is no change to the CTS Applicability.</p>	<p>3.6.9 Applicability</p>	<p>3.3.C.1</p>
A4	<p>CTS specifies that, if the IVSW System is not restored to Operable status within a specified Completion Time, then the reactor shall be brought to hot shutdown using normal operating procedures and that the shutdown starts no later than the end of the specified period. The statement that “the shutdown shall start no later than the end of the specified period,” is not needed because the requirement is established by ITS which specify completion time clocks always start as soon as applicable requirements are not met. This is an equivalent administrative change with no effect on safety because the statement in question is maintained by ITS.</p>	<p>1.3 3.6.9 Actions</p>	<p>3.3.C.3.a</p>

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
ITS SPECIFICATION 3.6.10 - WC&PP SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change with no effect on safety.	3.6.10	3.3.D
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.6.10	3.3
A3	CTS requires that all required portions of the four WC&PPS zones be pressurized above 43 psig and that uncorrected air consumption for the WC&PPS is $\leq 0.2\%$ of the containment volume per day. The equivalent ITS requires that WC&PPS be operable. In conjunction with this change, ITS also requires periodic verification that all required portions of the four WC&PPS zones are pressurized above 43 psig and ITS requires periodic verification that uncorrected air consumption for the WC&PPS is $\leq 0.2\%$ of the containment volume per day. This is an equivalent administrative change with no effect on safety.	LCO 3.6.10 SR 3.6.10.1 SR 3.6.10.2	3.3.D.1

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A4	<p>CTS establishes the Applicability for the WC&PPS as whenever the reactor is above cold shutdown. ITS keep this Applicability by requiring that WC&PPS be Operable in Modes 1, 2, 3, and 4 . In conjunction with this change, ITS substitute the term Mode 3 for the Hot Shutdown Condition and Mode 5 for Cold Shutdown Condition. These are equivalent administrative changes with no effect on safety because these changes are consistent with the ITS definitions for Modes 1, 2, 3, and 4. Specifically, Modes 1, 2, 3, and 4 are identical to all conditions above Cold Shutdown with the ITS Mode 3 corresponding to CTS Hot Shutdown and the ITS Mode 5 corresponding to CTS Cold Shutdown.</p>	<p>1.0 3.6.10 Applicability</p>	<p>3.3.D.1</p>
A5	<p>CTS specifies that if the WC&PPS is not restored to Operable within the specified Completion Time, then the reactor shall be brought to Hot Shutdown using normal operating procedures and that shutdown shall start no later than the end of the specified period. The statement that “the shutdown shall start no later than the end of the specified period” is not needed because the requirement is established by ITS which specify completion time clocks always start as soon as applicable requirements are not met. This is an equivalent administrative change with no effect on safety because the relevant statement is maintained by ITS.</p>	<p>1.3 3.6.10 Actions</p>	<p>3.3.D.3.a 3.3.D.2 3.3.D.3.c</p>
A6	<p>ITS 3.6.10 adds a new Note 2 that directs entry into the applicable Conditions and Required Actions of LCO 3.6.1 if it is determined that WC&PPS inoperability indicates or results in exceeding overall containment leakage rate. This is consistent with the intent of the CTS. This is an equivalent administrative change with no effect on safety.</p>	<p>3.6.10, NOTE 2 LCO 3.6.1</p>	<p>NONE</p>

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A7	<p>CTS specifies that the WC&PPS leakage rate be verified to be within limits when pressurized to ≥ 43 psig and the containment pressure is atmospheric. The equivalent ITS maintains the same requirement except that the minimum pressure differential is expressed as pressurized to ≥ 43 psi above containment pressure. This change is needed to clarify that small variations in containment pressure during the performance of this test do not invalidate test results as long as WC&PPS pressure is maintained ≥ 43 psi above containment pressure. This is an administrative change with no effect on safety.</p>	SR 3.6.10.3	3.3.D.1
A8	<p>CTS requires that all required portions of each of the WC&PPS zones be pressurized to a specified limit. CTS 3.3.D.1.b limits WC&PPS total leakage to a specified limit. CTS 3.3.D.2.a states that only one of four WC&PPS zones may be inoperable at a time, and sets an AOT for the inoperable zone. CTS 3.3.D.2.b sets an AOT if WC&PPS total leakage exceeds specified limits. Thus, the CTS 3.3.D.2.a requirements for an inoperable zone are actually requirements for a WC&PPS zone with one or more of the individual components supported by WC&PPS not at minimum pressure. Thus, ITS 3.6.10, Condition A, sets requirements for components supplied by WC&PPS not within specified pressure limits versus maintaining the CTS specification for an inoperable WC&PPS zone. This is an equivalent administrative change with no effect on safety.</p>	3.6.10, CONDITION A	3.3.D.1.a 3.3.D.1.b 3.3.D.2.a 3.3.D.2.b
A9	<p>CTS 4.4.C requires a sensitive leak rate test of the WC&PPS at intervals no greater than 3 years. The phrase “at intervals no greater than” indicates that the SR Frequency extension allowance provided in CTS 1.12 does not apply. ITS SR 3.6.10.3 maintains the requirement for a sensitive leak rate test of the WC&PPS at a Frequency of 36 months. The ITS SR 3.6.10.3 Frequency is modified by a Note indicating that SR 3.0.2 does not apply. This Note maintains the restriction imposed by the wording of CTS 4.4.C. This is an equivalent administrative change with no effect on safety.</p>	SR 3.0.2 SR 3.6.10.3 SR 3.6.10.3 NOTE	1.12 4.4.C

DOC	SUMMARY OF CHANGE	ITS SECTION	CTS SECTION
A10	<p>CTS requires that the uncorrected air consumption for the WC&PPS is $\leq 0.2\%$ of the containment volume per day. The equivalent ITS maintains the requirement except that the limit is based on containment free volume versus containment volume. This change is an editorial clarification that makes the wording of the SR requirement match CTS and the WC&PPS design requirement as described in FSAR 6.6. This is an equivalent administrative change with no effect on safety.</p>	SR 3.6.10.3	<p>3.3.D.1.b 4.4.7</p>

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.7 - PLANT SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.1	3.4.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.1	3.4.A
A3	CTS establish the Applicability for the main steam safety valves as whenever the reactor is heated >350°F. The equivalent ITS maintains this applicability by requiring that the MSSVs be operable in Modes 1, 2, and 3. This is an equivalent administrative change with no effect on safety.	3.7.1	3.4.A
A4	CTS provide the option of restoring inoperable MSSVs to operable within four hours when one or more MSSVs are inoperable. The equivalent ITS does not state this option explicitly because LCO 3.0.2 specifies that if an LCO is met or is no longer applicable prior to expiration of the specified Completion Time, completion of the RA is not required unless otherwise stated. This is an equivalent administrative change with no effect on safety.	3.7.1	3.4.A.1.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS specify that heat-up > 350°F and power operation is permissible with three of five MSSVs per SG inoperable provided that the Actions for one or more inoperable MSSVs are met. The equivalent ITS maintains the same allowance and specifies that only two MSSVs per SG are required to be operable. This is an equivalent administrative change with no effect on safety.	3.7.1	3.4.A.1 3.4.A.1.a Table 4.3-1
A6	CTS specify that a minimum steam-relieving capability of twenty MSSVs shall be operable. ITS maintains the equivalent requirement by listing each of the 20 MSSVs by valve number. This is an equivalent administrative change with no effect on safety.	3.7.1	3.4.A.1
A7	The Actions for inoperable MSSVs in ITS are preceded by a Note that allows complete and separate re-entry into any Condition for each inoperable MSSV, including separate tracking of Completion Times based on this re-entry. This allowance is consistent with an unstated assumption in the CTS. This is an equivalent administrative change with no effect on safety.	3.7.1	NONE
A8	CTS specify that system piping and valves directly associated with the MSSVs must be operable when the MSSVs are operable. This information is not necessary because it is a generic statement which falls within the ITS definition of operability. This is an equivalent administrative change with no effect on safety.	1.1	3.4.A.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.2	3.4.B
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.2	3.4.B
A3	CTS specify that if MSIV operability requirements cannot be met within specified Completion Times, then the operator shall start to shut down and cool the reactor below 350°F using normal operating procedures. Under the same conditions, the equivalent ITS establish specific Completion Times for plant shutdown and cooldown which were determined to provide a reasonable amount of time to reach the required Mode in an orderly way and without challenging systems. This is an equivalent administrative change with no effect on safety.	3.7.2	3.4.B
A4	CTS require that the MSIVs be tested to verify closure time is within specified acceptance criteria. The equivalent ITS maintains this requirement with the allowance that the test may be initiated by either an actual or simulated actuation signal to verify valve actuation. This is an equivalent administrative change with no effect on safety.	3.7.2	4.7
ITS SPECIFICATION 3.7.3 - MAIN BOILER FEEDPUMP DISCHARGE VALVES (MBFPDVs), MAIN FEEDWATER REGULATION VALVES (MBFRVs), AND MBFRV LOW FLOW BYPASS VALVES			

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.3	3.5.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change with no effect on safety.	3.7.3	3.5.1
A3	CTS establish the Applicability for Engineered Safety Features initiation instrumentation and, by default, the feedwater isolation function. CTS require operability of the feedwater isolation function whenever the plant is not in cold shutdown. The equivalent ITS establishes explicit operability requirements for feedwater isolation valves to be consistent with feedwater isolation actuation signals addressed in the ITS. This is an equivalent administrative change with no effect on safety.	3.3.2 3.7.3	3.5.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV)s			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.4	3.7.4
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.4	3.7.4
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.5	3.4.A
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.5	3.4.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require 3 operable AFW pumps and establish requirements for system piping and valves directly associated with AFW. The IP3 FSAR describes the AFW system as two pumping loops using two different types of motive power to the pumps with one loop consisting of a 200% capacity steam turbine-driven pump and the other loop consisting of two 100% capacity motor driven pumps. The equivalent ITS establishes requirements for 3 AFW "trains" with each train consisting of one AFW pump and a flow path from the CST to the SGs. This is an equivalent administrative change with no effect on safety.</p>	3.7.5	3.4.A
A4	<p>CTS establish Actions when one or more AFW pumps are inoperable during power operations, but no Actions are provided if AFW requirements are not met in Modes 2 and 3. Consistent with current IP3 practice, CTS Actions apply whenever AFW is required to be operable by the Applicability. The equivalent ITS resolves this ambiguity. This is an equivalent administrative change with no effect on safety.</p>	3.7.5	3.4.A.2 3.4.A.4
A5	<p>CTS specify that if 3 AFW pumps are inoperable, then the plant must be maintained in safe stable mode which minimizes the potential for a reactor trip. Similarly, CTS specify the same requirement if neither the CST nor CW can be aligned to support the AFW system. Under the same conditions, the equivalent ITS statements maintain the plant in a condition that minimizes the potential need for auxiliary feedwater for decay heat removal, although the ITS statement is more explicit in allowing this requirement to override other TS that may require plant shutdown, consistent with CTS interpretation and practice. This is an equivalent administrative change with no effect on safety.</p>	3.7.5 RA D.1, Note	3.4.A 3.4.C 3.4.E
A6	<p>CTS requires two SGs able to perform their heat transfer function and establishes the Applicability for the SG as whenever the reactor is heated > 350 °F. This requirement is equivalent to ITS LCO 3.4.4 which requires four RCS loops operable and in operation in Modes 1 and 2, and ITS LCO 3.4.5 which requires two RCS loops operable in Mode 3. This is an equivalent administrative change with no effect on safety.</p>	LCO 3.4.4 LCO 3.4.5	3.4.A 3.4.A.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS 4.8.1.a requires each auxiliary feedwater pump be started periodically and CTS 4.8.2 specifies the test acceptance criteria that each pump starts, reaches the required developed head and "operates for at least 15 minutes." ITS 3.7.5.2 maintains the same requirement; however, the acceptance criterion that the pump operate for at least 15 minutes is deleted. This change is acceptable because test procedures ensure that stable conditions are established prior to the verification of acceptance criteria and the requirement to operate for 15 minutes does not otherwise contribute to the verification of pump Operability. Therefore, this is an equivalent administrative change with no impact on safety.</p>	SR 3.7.5.2	<p>4.8.1.a</p> <p>4.8.2</p>
A8	Moved to L-Table		
A9	Moved to LA-Table		
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK (CST)			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	<p>3.7.5</p> <p>3.7.6</p>	<p>3.4.A</p> <p>3.4.B</p>
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.</p>	<p>3.7.5</p> <p>3.7.6</p>	<p>3.4.A</p> <p>3.4.B</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS require the operator to shut down and cool the reactor below 350 °F using normal operation procedures if requirements for operability of the CST cannot be met within the specified Completion Time. Under the same conditions, ITS require that the plant be in Mode 3 in 6 hours and Mode 4 in 18 hours. The ITS Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly way and without challenging systems. The addition of explicit CT is administrative because they are consistent with the existing interpretation of CTS 3.4.B.	3.7.6	3.4.B
A4	CTS establish requirements for operability of system piping and valves directly associated with the CST. This CTS is not needed because it is a general statement that does not provide any information or requirements specific to the CST. Valve lineups and verification of the operability of active components associated with the CST and the flow path to the AFW pump suction are verified as part of the ITS requirements for the AFW System.	3.7.5	3.4.A.4
ITS SPECIFICATION 3.7.7 - CITY WATER (CW)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.7	3.4.B
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.7	3.4.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS require the operator start to shut down and cool the reactor below 350 °F using normal operation procedures if requirements for operability of CW cannot be met within the specified Completion Time. Under the same conditions, the equivalent ITS require that the plant be in Mode 3 in 6 hours and Mode 4 in 18 hours. The ITS Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly way and without challenging systems. The addition of explicit CT is administrative because they are consistent with the existing interpretation of CTS 3.4.B.	3.7.7	3.4.B
A4	Not Used.		
ITS SPECIFICATION 3.7.8 - COMPONENT COOLING WATER (CCW) SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.8	3.3.E.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.8	3.3.E.1
A3	CTS specifies the Applicability for CCW System as whenever the reactor is above cold shutdown. ITS maintains this Applicability by requiring that the CCW System be Operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.7.8 Applicability	3.3.E.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS include requirements for CCW pumps and heat exchangers and include requirements for the RHR decay heat removal capability in Mode 4. If an inoperable CCW loop caused an RHR loop to be inoperable when RHR is required for decay heat removal, CTS would require that both CCW and the affected RHR heat exchanger be declared inoperable. Under the same conditions, ITS ensures the proper actions are taken for these components. This is an equivalent administrative change with no effect on safety.</p>	<p>3.0.6 3.4.6 3.7.8</p>	<p>3.2.A.1.c 3.3.E</p>
A5	<p>CTS specify that a CCW heat exchanger or other passive component may be OOS for 48 hours if the system will still operate at design accident capability. The ITS 3.7.8 statements are designed to ensure that CCW is operated consistent with the assumptions of the FSAR and WCAP-12313 regarding minimum heat removal capability even when redundant capability is not operable. This is an equivalent administrative change with no effect on safety.</p>	<p>3.7.8</p>	<p>3.3.E.2.c</p>
A6	<p>ITS makes an existing interpretation of CTS 3.3.E explicit in a note to SR 3.7.8.1, that isolation of the CCW flow to individual components may render those components inoperable but does not affect CCW system operability.</p>	<p>SR 3.7.8.1</p>	<p>3.3.E</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.9 - SERVICE WATER (SW) SYSTEM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.9	3.7.9
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.9	3.7.9
A3	CTS specify the Applicability for SW System/Ultimate Heat Sink (UHS) as whenever the reactor is above cold shutdown. ITS maintain this Applicability by requiring that the SWS and UHS be operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.7.9 3.7.10	3.3.F
A4	CTS specify that if requirements for SWS operability are not met and not restored within the specified time, then the reactor must be placed in cold shutdown using normal operating procedures. Under the same conditions, the equivalent ITS requires that the plant be in Mode 3 in 6 hours and Mode 5 in 36. This is an equivalent administrative change with no effect on safety. This is an equivalent administrative change with no effect on safety.	3.7.9	3.3.F.2
A5	Not Used.		

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	CTS do not include any specific requirements or guidance related to the effect on SW System operability when components or systems supported by SW are isolated. The equivalent ITS is modified by a Note indicating that the isolation of the SWS components or systems may render those components inoperable, but does not affect the Operability of the SW System.	LCO 3.7.9 NOTE	3.3.F
A7	CTS specify that isolation must be maintained between the essential and nonessential headers at all times except that for a period of eight hours the headers may be connected while another essential header is being placed in service. The equivalent ITS maintains and clarifies this requirement. This is an equivalent administrative change with no effect on safety.	3.7.9	3.3.F.4
A8	CTS specifies that SWS pumps ‘... together with their associated piping and valves are operable.’ ITS maintains the same requirement by providing a required action and completion time for SWS piping and valves that are inoperable for reasons other than the remaining defined conditions as long as there is no loss of safety function.	3.7.9 Condition E	3.3.F.1.a
ITS SPECIFICATION 3.7.10 - UHS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.10	3.3.F

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.10	3.3.F
A3	CTS specify the Applicability for SW System/UHS as whenever the reactor is above cold shutdown. The equivalent ITS maintains this Applicability by requiring that the SW System and UHS be operable in Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.7.9 3.7.10	3.3.F
A4	Not used.		
A5	Not used.		
ITS SPECIFICATION 3.7.11 - CONTROL ROOM VENTILATION SYSTEM (CRVS)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.11	3.3.H
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.11	3.3.H

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS require that the CRVS be operable at all times when containment integrity is required. The equivalent ITS maintain this by requiring the CRVS to be Operable during Modes 1, 2, 3, and 4. This is an equivalent administrative change with no effect on safety.	3.7.11	3.3.H.1
A4	CTS require that the charcoal filtration system be operated for 15 minutes every month. The equivalent ITS requires that each CRVS train be operated for ≥ 15 minutes at a frequency of 31 days. This is an equivalent administrative change with no effect on safety.	3.7.11	4.5.A.5.b
A5	CTS include requirements for the inspection and testing of the control room air filtration system. The equivalent ITS maintains these requirements as part of a TS program governing the testing of all ventilation filter systems governed by the ITS. This is an equivalent administrative change with no effect on safety.	SR 3.7.11.2 5.5.10	4.5.A.5.a 4.5.A.5.c 4.5.A.5.d
A6	CTS do not include a specific requirement to verify every 24 months that each CRVS train actuates on an actual or simulated actuation signal. The equivalent ITS require verification that each CRVS train actuates on an actual or simulated actuation signal. This is an equivalent administrative change with no effect on safety.	SR 3.7.11.3	3.3.H 4.5.A.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.12 - CONTROL ROOM AIR CONDITIONING SYSTEM (CRACS)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.12	3.3.H
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.12	3.3.H
ITS SPECIFICATION 3.7.13 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.13	3.8.A.12
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.13	3.8.A.12

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS specify that the FBEVS must be operable during fuel handling and, more specifically, whenever irradiated fuel is being handled within the fuel storage building. The equivalent ITS maintains this Applicability. This is an equivalent administrative change with no effect on safety.	3.7.13	3.8.A 3.8.A.12 3.8.C 3.8.C.6
A4	CTS establish requirements for the inspection and testing of the FBEVS. The equivalent ITS maintains these requirements as part of a TS program governing the testing of all ventilation filter systems governed by the ITS. This is an equivalent administrative change with no effect on safety.	SR 3.7.13.3 5.5.10	4.5.A.6.b 4.5.A.6.c

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.14 - SPENT FUEL PIT WATER LEVEL			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.14	3.8.A.10
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.14	3.8.A.10
A3	CTS specify that the water level in the fuel storage pit must be maintained ≥ 23 feet over the top of irradiated fuel assemblies seated in the storage rack whenever irradiated fuel in the spent fuel pit is being moved. However, there is no explicit statement of the actions required if level is not maintained during movement of irradiated fuel. ITS requires that the movement of irradiated fuel assemblies in the fuel storage pool be suspended immediately when the fuel storage pool water level is lower than the required level, and allows movement of a fuel assembly to a safe position. This is an equivalent administrative change with no effect on safety.	3.7.14 Actions	3.8.C.4
A4	CTS specifies that the minimum water level in the fuel storage pit “in the area of movement” must be maintained ≥ 23 feet over the top of irradiated fuel assemblies seated in the storage rack whenever irradiated fuel in the spent fuel pit is being moved. ITS maintains this but the statement “in the area of movement” is not needed. This is an equivalent administrative change with no effect on safety.	3.7.14	3.8.C.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.15 - SPENT FUEL PIT BORON CONCENTRATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.15	3.8.D
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.15	3.8.D
A3	CTS specify that requirements for spent fuel pit boron concentration apply only during periods of spent fuel movement in the spent fuel pit. However, other CTS specify that requirements for spent fuel pit boron concentration apply whenever fuel is stored in the spent fuel pit. The ITS corrects this discrepancy in the Applicability for spent fuel pit boron concentration limits. This is an equivalent administrative change with no effect on safety.	3.7.15	3.8.C.3 Table 4.1-12 5.4.3
A4	CTS require that spent fuel pit minimum boron concentration during periods of spent fuel movement must be > 1000 ppm. However, other CTS specifies that spent fuel pit minimum boron concentration must match that used in the reactor cavity and refueling canal during refueling operations. ITS corrects this discrepancy and specifies that spent fuel pit minimum boron concentration shall be maintained ≥ 1000 ppm. This is an equivalent administrative change with no effect on safety.	3.7.15	3.8.C.3 5.4.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS specifies requirements for the spent fuel pit minimum boron concentration. However, no explicit actions are specified if these limits are not met. ITS specifies RA which are a reasonable interpretation of the existing requirements. This is an equivalent administrative change with no effect on safety.	3.7.15 Actions	3.8.C.3 5.4.3
ITS SPECIFICATION 3.7.16 - SPENT FUEL ASSEMBLY STORAGE			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.16	3.8.C
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.16	3.8.C
A3	CTS specifies restrictions on spent fuel storage locations as shown in two figures. ITS maintains the same restrictions but combines the two figures into one ITS figures, and revises the nomenclature used to improve clarity. This is an equivalent administrative change with no effect on safety.	3.7.16 Actions Figure 3.7.16-1	3.8.C.7 Figure 3.8-1 Figure 3.8-2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS specify requirements for fuel assembly storage locations in the spent fuel pit based on a combination of initial enrichment and burnup. However, no explicit requirements are specified for verification that these requirements for fuel assembly storage locations. The equivalent ITS requires verification by administrative means that the initial enrichment and burnup of each fuel assembly and the storage location are appropriate. This is an equivalent administrative change with no effect on safety.</p>	SR 3.7.16.1	3.8.C.7
A5	<p>CTS specify requirements for fuel assembly storage locations in the spent fuel pit based on a combination of initial enrichment and burnup. However, no explicit requirements are specified if the requirements for fuel assembly storage locations are not met. The equivalent ITS maintains the requirements for fuel assembly storage locations and adds actions to be initiated immediately to move a noncomplying fuel assembly from the improper location. This is an equivalent administrative change with no effect on safety.</p>	3.7.16 Actions	3.8.C.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.17 - SECONDARY SPECIFIC ACTIVITY			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.7.17	3.1.G
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.7.17	3.1.G

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.1	3.7
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.8.1	3.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require 6.9 kV bus tie breaker control switches be in pull-out when the 13.8 kV source feeds 6.9 kV buses 5 and 6. This is because, at power, 6.9 kV buses 1 to 4, which supply four RCPs, are powered from the main generator via the unit auxiliary transformer; but if the main generator trips, 6.9 kV buses 1 to 4 autotransfer to 6.9 kV buses 5 and 6 fed from either the 138 kV or 13.8 kV source. Though each is enough for ESF, only the 138 kV source supports both ESF and four RCPs. Thus, if the 13.8 kV source feeds buses 5 and 6, then CTS require 6.9 kV bus tie breaker control switches be in pull-out. This prevents overloading if the main generator trips. ITS require disabling autotransfer of 6.9 kV buses 1 through 4 to the offsite source if the 13.8 kV source supplies 6.9 kV bus 5 or 6 but ITS allow 1 hour CT, while CTS do not have a CT. Though usually autotransfer is disabled before switching to the 13.8 kV source, a 1-hour CT ensures timely completion. ITS verify every eight hours that the RA is maintained. This is an equivalent administrative change with no safety effect since one hour is reasonable.</p>	<p>LCO 3.8.1 RA A.2 NOTE</p>	<p>3.7.B.3</p>
A4	<p>CTS require that the loss of offsite power/ESF actuation test be initiated by simulating a loss of all normal AC station service power supplies. ITS allow the use of either an actual or simulated signal to initiate the test. This change is acceptable because use of an actual instead of a simulated or "test" signal will not affect the performance of the test because the equipment being tested cannot discriminate between an actual or simulated signal. This is an administrative change with no safety effect since the use of an actual or simulated signal does not change the validity of the test as a verification of plant response to the event.</p>	<p>SR 3.8.1.12</p>	<p>4.6.A.3</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS require weekly verification of the fuel inventory for DGs 31, 32, and 33. DG fuel inventory includes the DG day tanks, the onsite underground fuel oil storage tanks, and the offsite fuel oil reserve. ITS require periodic verification of DG fuel oil inventory in the onsite storage tanks and the offsite fuel oil reserve. ITS also require periodic verification of DG fuel oil inventory in the DG day tanks. ITS keep the requirement for periodic verification of DG fuel inventory in the day tanks except that ITS include the acceptance criterion that each day tank contain ≥ 115 gallons of fuel oil. This acceptance criterion is acceptable because 115 gallons of fuel oil is sufficient for approximately one hour of DG operation at the continuous rating. Additionally, automatic makeup to the day tank is initiated at approximately 115 gallons; therefore, this acceptance criteria provides an indirect confirmation that the automatic fuel transfer capability required by ITS is functional. The addition of acceptance criteria is an equivalent administrative change with no safety effect because the acceptance criteria is identical to requirements in FSAR Section 8.2 and consistent with current practice.</p>	<p>LCO 3.8.3 SR 3.8.1.6</p>	<p>TABLE 4.1-3 ITEM 8</p>
A6	<p>CTS require each DG be started manually monthly, be synchronized to its bus, allowed to assume normal load, and run for a time sufficient to reach stable temperatures. ITS keep this requirement but include four new notes: Note 1 says that DG loading may include gradual loading. This is consistent with and a clarification to the CTS requirement to start DGs manually. Note 2 says that momentary transients outside load range do not invalidate the test. This is consistent with the CTS requirement to operate at normal load and is needed since ITS have loading requirements for the test. Note 3 specifies that the SR be conducted on only one DG at a time. This is consistent with CTS requirements to keep the specified number of DGs operable. Note 4 specifies that the SR be preceded by and immediately follow without shutdown a successful DG fast start test. This is needed since ITS set criteria for DG starting during the monthly test. These notes are an equivalent administrative change with no safety effect since they are either clarifications, allowances, or needed to support other changes.</p>	<p>3.8.1 SR 3.8.1.2 SR 3.8.1.3 NOTE 1 SR 3.8.1.3 NOTE 2 SR 3.8.1.3 NOTE 3 SR 3.8.1.3 NOTE 4</p>	<p>4.6.A.1 3.7.A.5 3.7.F.4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
A7	<p>CTS require that each DG to be manually started each month, synchronized to its bus or buses, allowed to assume the normal bus load, and run for a time sufficient to reach stable operating temperatures. ITS keep this requirement but include a note allowing the DG starts to be preceded by a prelube period. This allowance is intended to minimize the stress and wear on moving parts that do not get lubricated when the engine is not running. This note is consistent with the recommendations in Generic Letter 84-15 and current industry practice. This is an administrative change with no significant adverse impact on safety because the CTS requirement for a manual start does not preclude a prelube period and the note is needed to clarify requirements associated with new fast start acceptance criteria justified elsewhere.</p>	<p>SR 3.8.1.2 SR 3.8.1.12 3.8.1</p>	<p>4.6.A.1</p>
A8	<p>CTS establish requirements intended to ensure that auto-connected emergency loads are re-connected to the emergency bus within the time interval assumed in the safety analysis and require testing of the individual time delay relays used to sequence the starting of ESF components. CTS includes a redundant requirement to verify that the DGs assume their required loads within 60 seconds after the initial start signal. ITS maintains this requirement to verify that auto-connected emergency loads are re-connected to the emergency bus within the time interval assumed in the safety analysis and ITS keep the requirement to verify that DGs assume the required load; however, ITS do not include a specific requirement to verify that re-connection of loads is complete within 1 minute. This change is acceptable because ITS will ensure that the loads re-connect within required limits specified in the FSAR and these limits are currently less than one minute. This is an equivalent administrative change with no adverse safety effect.</p>	<p>SR 3.8.1.11 SR 3.8.1.12.c.2</p>	<p>4.5.A.1.a FOOTNOTE* 4.6.A.3 FOOTNOTE* 4.6.A.3.c</p>
<p>ITS SPECIFICATION 3.8.2 - AC SOURCES SHUTDOWN</p>			

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.2	3.7
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.8.2	3.7
A3	CTS specify requirements for offsite power in Modes 5 and 6 as one transmission circuit to Buchanan Substation. ITS specify requirements for offsite power in Modes 5 and 6 as one transmission circuit between the offsite transmission network and the onsite AC electrical power distribution subsystems. This is an equivalent administrative change with no adverse safety effect since it is an explicit statement of a reasonable interpretation of the existing requirement.	LCO 3.8.2 3.8.1	3.7.F.1
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.3	3.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.8.3	3.7
A3	CTS include requirements for DG fuel oil inventory as an integral part of DG operability requirements. ITS have a requirement for DG operability separate from requirements for operability of DG support systems. Thus, the limited levels of degradation permitted by these new conditions justify some allowance for restoration. During the newly allowed restoration periods for these parameters, the DG is still capable of performing its function. This reorganization of TS requirements is an equivalent administrative change with no effect on safety.	3.8.3 LCO 3.8.2 LCO 3.8.1	3.7 TABLE 4.1-2 ITEM 8
A4	ITS 3.8.3 Conditions and RAs are preceded by the Note "Separate Condition entry is allowed for each DG." In conjunction with ITS 1.3, this Note provides direction consistent with the CTS for an inoperable DG. Specifically, this note allows separate entry into an LCO 3.8.3 Condition for each DG and separate tracking of Completion Times based on a particular DG's time of entry into the Condition. However, the ITS design is unique in that fuel oil reserve inventory requirements are not associated with a specific DG and separate condition entry is not appropriate when this Condition affects more than one DG; thus, RAs for ITS 3.8.3, Conditions B and C, ensure that all affected DGs are declared inoperable if the Condition is entered or the Completion Time exceeded. This eliminates the need to take exception to the Note allowing separate condition entry for Conditions B and C. The addition of the separate Condition Note and design of Conditions B and C are equivalent administrative changes with no safety effect since any technical changes to CTS requirements are discussed elsewhere.	3.8.3 CONDITIONS and RAs NOTE 1.3 LCO 3.8.3 CONDITION	NONE

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS specify that DG fuel oil requirements for three DGs apply when above cold shutdown and that DG fuel oil requirements for two DGs apply under all conditions. ITS specify an Applicability of "when associated DG is required to be OPERABLE." Thus, changes to the Applicability for CTS 3.7.A are described and justified as part of ITS LCO 3.8.1 and changes to the Applicability for CTS 3.7.F are described and justified as part of ITS LCO 3.8.2. This is an equivalent administrative change with no effect on safety because the applicability of ITS LCO 3.8.3 is just a more specific statement of the existing requirement and any differences between the ITS and CTS requirements are described and justified as part of ITS LCOs 3.8.1 and 3.8.2.</p>	<p>LCO 3.8.2 LCO 3.8.1 LCO 3.8.3</p>	3.7.A
A6	<p>Above cold shutdown, CTS require each DG fuel oil tank to have 6,671 gallons fuel oil, and under all conditions, a combined total of 6,671 gallons fuel oil must be in the DG fuel oil tanks. ITS require the same, but set requirements in terms of useable fuel, not tank volume. (Also, see related DOC L4). This is an equivalent administrative change.</p>	<p>LCO 3.8.3 SR 3.8.3.2 CONDITION A SR 3.8.3.2 CONDITION B</p>	<p>3.7.A.5 3.7.F.4</p>
A7	<p>CTS establish requirements for properties of DG fuel oil in the DG fuel oil reserve. Specifically, DG fuel oil in the fuel oil reserve must be "compatible for operation with the diesels." This requirement is maintained in ITS. This is an equivalent administrative change.</p>	5.5.12	3.7.A.5
A8	<p>CTS require that each DG fuel oil storage tank contain 6,671 gallons fuel oil when above cold shutdown; otherwise, CTS require that the associated DG be declared inoperable immediately. CTS require a total of 6,671 gallons of fuel oil be in the DG fuel oil storage tanks under all conditions; otherwise, there is an unstated requirement that both required DGs are declared inoperable immediately. ITS maintain the same requirements, but ITS establish these requirements by a specific statement of the Conditions and the associated RAs. This is an equivalent administrative change with no adverse effect on safety.</p>	<p>LCO 3.8.3 CONDITION A RAs LCO 3.8.3 CONDITION B RAs</p>	<p>3.7.A.5 3.7.B.1 3.7.F.4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.4	4.6.B.4
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.8.4	4.6.B.4
A3	CTS establish requirements for a performance or modified performance discharge test every 60 months. This requirement is modified by a footnote stating that the first time a performance discharge test will be performed will be in refueling outage 10/11. This note is not retained in ITS since ITS will not be implemented until after refueling outage 10/11. This is an equivalent administrative change with no effect on safety.	NONE	4.6.B.4
A4	CTS require that the voltage of each battery be measured and recorded every month. ITS maintain this requirement; however, the explicit requirement that data must be recorded is deleted. This is an equivalent administrative change with no effect on safety.	SR 3.8.4.1	4.6.B.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS 4.6.B.4 Note 1, allows a battery modified performance discharge test to be done instead of the battery service test every other 24 month cycle. ITS allows a battery modified performance discharge test to be done instead of the battery service test at any time. This change is acceptable because a modified performance discharge test is required to envelope the duty cycle of the service test and, therefore, provides a better indication of battery condition than the service test. IEEE 450-1995, Section 5.4, the latest guidance for maintenance and testing of lead-acid batteries for the optimization of life and performance of the batteries in use for emergency applications at nuclear power plants states, "A modified performance discharge test can be used in lieu of a service test at any time." This is an equivalent administrative change with no safety effect.</p>	SR 3.8.4.3	4.6.B.4 NOTE 1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN			
	NONE		
ITS SPECIFICATION 3.8.6 - BATTERY CELL PARAMETERS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.6	4.6
A2	CTS 4.6.B requires verification that battery cell parameters are within acceptable limits for battery Operability; however, no acceptance criteria is established. Therefore, IP3 procedures that implement CTS include acceptance criteria based on IEEE-450 and manufacturer's recommendations. ITS include acceptance criteria for battery cell parameters needed for battery Operability which are identified as Category C Allowable Limits. In addition ITS add the acceptance criteria for battery cell temperature. This is an administrative change with no impact on safety because the acceptance criteria identified as ITS Table 3.8.6-1, Category C Allowable Limits, and ITS are consistent with the acceptance criteria in IP3 procedures. The addition of new Category A and B limits in ITS Table 3.8.6-1 is a more restrictive change addressed by DOC M1.	3.8.6 TABLE 3.8.6-1 SR 3.8.6.3	4.6.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>ITS 3.8.6 Conditions and RAs are preceded by the Note "Separate Condition entry is allowed for each battery." In conjunction with the ITS Specification 1.3 this Note provides direction consistent with the intent of the CTS for a degraded or inoperable battery. Specifically, this note allows separate entry into an LCO 3.8.6 Condition for each battery and separate tracking of Completion Times based on a particular battery's time of entry into the Condition. This is acceptable because the RAs for each Condition provide appropriate compensatory actions for each degraded or inoperable battery. Complying with the RAs for one degraded or inoperable battery may allow continued operation, and subsequent degraded or inoperable batteries are governed by separate Condition entry and application of associated RAs. This is an equivalent administrative change with no effect on safety because any differences between the existing requirements and ITS are described and justified elsewhere in this discussion of changes.</p>	<p>LCO 3.8.6 NOTE CONDITION RAs 1.3</p>	NONE
A4	<p>CTS require that battery voltage be measured and recorded every month. ITS maintain the requirement to verify battery voltage every month, but not the explicit requirement that data must be recorded. This is an administrative change with no safety effect.</p>	<p>3.8.6 SR 3.8.4.1</p>	4.6.B.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.7	NONE
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases. This is an equivalent administrative change.	3.8.7	NONE
A3	ITS 3.8.7 Actions are modified by a note requiring the entry into the Conditions and RAs of LCO 3.8.9, if an inoperable inverter results in a 120 V AC Instrument Bus being de-energized. This note is needed because it allows LCO 3.8.7 to provide requirements for the loss of an inverter without regard to whether a bus is de-energized. LCO 3.8.9 provides the appropriate restrictions for a de-energized train and ensures that the vital bus is re-energized within 2 hours. This is an equivalent administrative change with no safety effect since it is a more explicit statement of an existing requirement.	3.8.7 ACTIONS NOTE LCO 3.8.7 LCO 3.8.9 CONDITIONS RAs	NONE
ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN			
	NONE		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.9	NONE
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.8.9	NONE
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.8.10	NONE
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.8.10	NONE

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION - 3.9 REFUELING OPERATIONS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.9.1	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.9.1	3.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS specifies refueling boron concentrations must be maintained in “all filled portions of the RCS and the refueling canal.” ITS LCO 3.9.1 specifies refueling boron concentrations must be maintained in “the Reactor Coolant System and the refueling cavity” and that the concentration in these areas shall be within limits specified in the COLR. The addition of the refueling cavity to the areas governed by refueling boron concentration is consistent with current interpretation of the CTS requirement.</p>	LCO 3.9.1	3.8
ITS SPECIFICATION 3.9.2 NUCLEAR INSTRUMENTATION			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	3.9.2	3.8
A2	<p>The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.</p>	3.9.2	3.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require the core subcritical neutron flux to be monitored continuously by two source range neutron monitors when core geometry is being changed. ITS 3.9.2 requires two source range neutron flux monitors be operable in Mode 6. These are equivalent requirements. This is an administrative change because it is consistent with the existing CTS intent and current practice.</p>	3.9.2	<p>3.8.A.4</p> <p>3.8.B</p>
A4	<p>CTS specify that requirements for source range monitors apply during handling operations and during reactor vessel head removal or installation, but CTS 3.8.A.4 specifies that at least one source range neutron flux monitor shall be in service when core geometry is not being changed, ITS LCO 3.9.2, LCO and Applicability, requires 2 SRMs operable in Mode 6, but ITS LCO 3.9.2, Required Actions A.1 and A.2, require suspending Core Alterations and positive reactivity additions if only one SRM is operable. These are equivalent administrative changes with no effect on safety because the combination of the ITS LCO 3.9.2 Applicability and Required Actions A.1 are consistent with the intent and interpretation of the existing CTS requirements.</p>	<p>LCO 3.9.2</p> <p>LCO 3.9.2 RA A.2</p> <p>LCO 3.9.2 RA A.1</p>	<p>3.8.A</p> <p>3.8.A.4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.9.3	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.9.3	3.8
A3	CTS requires establishing containment conditions “during refueling operations and handling operations.” ITS applicability is “during core alterations and during movement of irradiated fuel assemblies within containment.” This is an equivalent administrative change because ITS requirements are consistent with CTS interpretation and intent.	3.9.3	3.8.A
A4	CTS 3.8.A.1 establishes requirements for closure of the equipment door. The ITS LCO 3.9.3.a maintain the equipment door requirements. This is an equivalent administrative change because ITS requirements are consistent with CTS requirements and current practice.	LCO 3.9.3.a	3.8.A.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	<p>CTS 3.8.A.9 specifies operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers. ITS LCO 3.9.3.d specifies that the Containment Vent and Purge System shall be either: isolated or, aligned to discharge through the HEPA filters and charcoal adsorbers. This change corrects an ambiguity in CTS 3.8.A.9. ITS LCO 3.9.3.d provides the clarification that the Containment Building Vent and Purge System must be lined up to the HEPA filters and charcoal adsorbers only if the system is in operation. This is an equivalent administrative change in that the ITS retains CTS intent and practice.</p>	LCO 3.9.3.d	3.8.A.9
A6	<p>CTS 3.8.A.9 specifies that movement of fuel in the reactor before the reactor has been subcritical for ≥ 421 hours will necessitate operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers. Footnotes to CTS 3.8.A.9 and 4.13.B specify that the required delay time is increased to ≥ 550 hours if VANTAGE + fuel assemblies are involved. VANTAGE + fuel assemblies are currently used in the IP3 reactor; therefore, ITS LCO 3.9.3 includes only the more conservative 550-hour limit. This is an equivalent administrative change in that the ITS retains CTS intent and practice.</p>	LCO 3.9.3	3.8.A.9 4.13.B
A7	<p>CTS specify requirements for testing HEPA filters and charcoal adsorbers which are retained in the ITS. ITS keep the identical requirement by establishing a requirement to perform required Containment Vent and Purge System filter testing according to the Ventilation Filter Testing Program (VFTP) at the frequency specified in the VFTP. This is an equivalent administrative change in that the ITS retains CTS intent and practice.</p>	5.5.10 SR 3.9.3.4	3.8.A.9 4.13

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	This change replaces the CTS requirement to halt any activity that may increase the reactivity of the core with the more specific ITS requirements to suspend core alterations and fuel movement. This is an equivalent administrative change in that the ITS retains CTS intent and practice.	3.9.3	3.8.B
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION -- HIGH WATER LEVEL			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.9.4	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.9.4	3.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS have requirements for redundant decay heat removal capability and forced flow in the RCS during handling operations; and when the reactor is not in the refueling condition. ITS maintain the requirements for redundant decay heat removal capability and forced flow in the reactor coolant system in Mode 6. This is an equivalent administrative change with no change to CTS requirements.</p>	<p>LCO 3.9.4 LCO 3.9.5</p>	<p>3.8.A.5 3.8.A.13 3.1.A.1.d 3.3.A.7</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.9.5	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.9.5	3.8
A3	CTS establish requirements for redundant decay heat removal capability and forced flow in the RCS during handling operations and when the reactor is not in refueling. ITS retains the requirements for redundant decay heat removal capability and forced flow in the RCS in Mode 6. This is an equivalent administrative change with no change to CTS requirements.	LCO 3.9.4 LCO 3.9.5	3.8.A 3.8.A.5 3.8.A.13 3.1.A.1.d 3.3.A.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	3.9.6	3.8
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	3.9.6	3.8
A3	CTS require refueling cavity water level to be within specified limits whenever irradiated fuel is being moved. ITS require refueling cavity water level to be within specified limits during Core Alterations and movement of irradiated fuel assemblies within containment. This is an equivalent administrative change in that the ITS retains CTS intent and practice.	3.9.6	3.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS specify that if refueling operation LCOs are not met, then refueling and operations which may increase the reactivity of the core shall cease until specified limits are met. While the ITS have separate LCOs and associated Required Actions for each of the key aspects of refueling, the CTS requirements are retained. When reactor cavity water level is not within limits, ITS require suspending core alterations and suspending movement of irradiated fuel in containment. This is an equivalent administrative change.</p>	3.9.6	3.8.B

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced CTS Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	4.1	5.1
A2	The CTS statements of objective and applicability were replaced, and the STS format for applicability was adopted. Information provided in the CTS Applicability is provided in the ITS LCO statement. Information in the CTS Objective does not set forth any requirements, is not needed in the ITS, and is moved to the Bases.	4.1	5.1
A3	CTS specify the minimum distance from the reactor center line to the boundary of the site exclusion area and the outer boundary of the low population zone as defined in 10 CFR 100.3. ITS maintain this requirement and add a description of the site location. This is an equivalent administrative change because it adds descriptive information consistent with existing requirements in the FSAR. Therefore, this change has no effect on safety.	4.1	5.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	<p>CTS provide core design information including the fact that the core contains approximately 89 metric tons of uranium; details about the average enrichment of the initial core; the requirement that reload core design be similar to the initial core; the fact that burnable poison rods were incorporated in the initial core; and, the fact that burnable poison rods of an approved design may be used in reload cores for reactivity and power distribution control. Although ITS do not include these details, ITS specify that fuel assemblies must be limited to those fuel designs analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. This change ensures more effectively that fuel and core designs meet all applicable requirements. This is an equivalent administrative change with no effect on safety because there is no change to any existing requirement.</p>	4.2.1	5.3.A.1
A5	<p>CTS do not provide explicit guidance on the use of lead test assemblies in core design. ITS provide the clarification that a limited number of lead test assemblies that have not completed representative testing may be placed in non-limiting core regions. This change is needed because the more explicit statement in ITS 4.2.1 that fuel assemblies must be limited to those fuel designs analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases could be construed as prohibiting use of lead test assemblies. This is an equivalent administrative change with no adverse effect on safety because the less explicit statement of requirements for fuel design already in CTS would not prohibit the use of lead test assemblies.</p>	4.2.1 4.0	5.3.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	<p>CTS require that fuel pellets be encapsulated in Zircaloy-4 or ZIRLO tubing and consist of slightly enriched uranium dioxide. ITS specify that fuel pellets be encapsulated in Zircaloy or ZIRLO and that the initial composition of the fuel may include natural or slightly enriched uranium dioxide. These changes avoid unnecessarily limiting fuel design parameters. These changes are acceptable because ITS consistently with CTS, specify that fuel assemblies must be limited to fuel designs analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. This is an equivalent administrative change with no adverse effect on safety.</p>	4.2.1	<p>5.3.A.1</p> <p>5.3.A</p>

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.1 - RESPONSIBILITY			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.1	4.1
A2	CTS cross reference the responsibilities of the Plant Operating Review Committee and the Safety Review Committee associated with the implementation of the Radiological Environmental Technical Specifications in the appropriate sections of Appendix A TS 6.5. This cross reference is not needed in ITS. This is an equivalent administrative change.	5.1	4.1 6.5
ITS SPECIFICATION 5.2 - ORGANIZATION			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.2	6.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	<p>CTS require that at least two licensed operators be in the CR during reactor startup, scheduled reactor shutdown, and recovery from reactor trips. However, 10 CFR 50.54 (m)(2)(iii) imposes the more restrictive requirements that a licensed reactor operator (RO) must be present at the controls at all times and at least one Senior Reactor Operator (SRO) must be present in the CR when in an operational mode other than cold shutdown or refueling. ITS impose requirements similar to 10 CFR 50.54 (m)(2)(iii). The requirements imposed by CTS are adequately retained by ITS and 10 CFR 50.54 (m)(2)(iii) and are not repeated in the ITS. This is an equivalent administrative change with no effect on safety.</p>	5.2.2.b	6.2.2.c
A3	<p>CTS do not specifically require development and implementation of administrative procedures to limit the working hours of unit staff performing safety related functions. ITS requires the development and implementation of such procedures. In addition, CTS include a clarification that overtime restrictions apply to "on shift" individuals holding SRO or RO licenses, nuclear plant operators, shift technical advisors, shift contingency health physicists, and I&C and maintenance personnel. ITS provide examples of personnel for which the overtime restrictions apply including: licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel. The CTS and ITS clarifications of the personnel for which overtime restrictions apply are functionally equivalent and both require more detailed descriptions provided in implementing procedures. Therefore, these changes are equivalent administrative changes with no effect on safety.</p>	5.2.2.e	6.2.2.g
A4	Moved to LA Table		
A5	Not Used		

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	<p>CTS specify the minimum qualifications for the STA as a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and the response and analysis of plant transients and accidents. ITS require that the STA meet the qualifications specified by the (NRC) Commission Policy Statement on Engineering Expertise on Shift. Both the CTS and ITS do not contain provisions for the use of the dual role SRO/STA as permitted by the Commission Policy Statement on Engineering Expertise on Shift. Thus, ITS default to Option 2 of the Policy Statement which requires that the STA meet the STA criteria of NUREG-0737. CTS and related IP3 commitments currently require that the STA meet the criteria of NUREG-0737. Thus, this is an equivalent administrative change with no effect on safety.</p>	5.2.2.f	6.3.1
ITS SPECIFICATION 5.3 - UNIT STAFF QUALIFICATIONS			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	5.3	6.2
A2	Not Used		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.4 - PROCEDURES			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.1	6.8.1
A2	CTS require that written procedures must be established, implemented, and maintained for refueling operations and for surveillance and test activities of safety related equipment. ITS do not list these activities since these activities fall within the applicable procedures recommended in Regulatory Guide 1.33, Revision 0, Appendix A, November 1972, and, as such, are already specified in CTS 6.8.1.a and ITS 5.4.1.a. Elimination of a redundant requirement is an equivalent administrative change with no effect on safety.	5.4.1 5.4.1.a	6.8.1.b 6.8.1.c 6.8.1.a
A3	CTS require that written procedures be established, implemented, and maintained for the Process Control Program, ODCM, Radioactive Effluent Control Program; and, Radiological Environmental Monitoring Program. ITS 5.4.1 does not specifically list these activities because these activities fall within the ITS 5.4.1.e) requirement that written procedures be established, implemented, and maintained for all programs required by ITS 5.5. This is an equivalent administrative change with no effect on safety.	5.4.1 5.4.1.e 5.5	6.8.1.f 6.8.1.g 6.8.1.l
A4	CTS specify that procedures and programs necessary to implement the Radiological Environmental TS are delineated in CTS 6.8.1 and 6.8.4. This cross reference is not required in the ITS. This is an equivalent administrative change with no effect on safety.	NONE	ETS 4.2 6.8.1 6.8.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS			
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.1	6.8.1
A2	The CTS requires that the ODCM be approved by the NRC. The requirement is already satisfied and changes to the ODCM are controlled by ITS 5.5.1.	5.5.1	4.6.1
A3	CTS specify that changes to the ODCM are effective upon review and acceptance by the PORC and the approval of the Site Executive Officer. ITS 5.5.1 specifies that changes to the ODCM are effective after the approval of the plant manager. Requirements review and approval of programs and procedures by PORC and the SRC are quality assurance functions and are not retained in the ITS. Requirements review and approval or programs and procedures and requirements for the PORC and the SRC oversight and review function are moved to the Quality Assurance Plan which will establishes requirements equivalent to those found in the CTS. This is an equivalent administrative change.	5.5.1	ETS 4.6.2.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.2	6.14
A2	The IP3 Facility Operating License (FOL) requires implementation of a program to reduce leakage of radioactive fluids outside containment. ITS 5.5.2 maintains the requirement but names of affected systems are modified to be consistent with the STS. This is an equivalent administrative change.	5.5.2	FOL paragraph 2L
ITS SPECIFICATION 5.5.3 - POST ACCIDENT SAMPLING			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.3	6.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
A2	<p>Facility Operating License DPR-64, paragraph 2.M, and CTS establish requirements consistent with NUREG-0737 by ensuring the plant will be able to collect and analyze or measure representative samples of radioactive iodides and particulates in plant gaseous effluents during and following an accident. CTS establish requirements consistent with NUREG-0737, Item II.B.3 by ensuring the plant will be able to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. CTS 6.8.1.h and CTS 6.8.1.i ensure that written procedures associated with these programs are established, implemented, and maintained. ITS 5.5.3, Post Accident Sampling, maintains these requirements consistent with the guidance provided in Generic Letter 83-036, NUREG-0737 Technical Specifications. There are no changes to the existing requirements; therefore, this is an administrative change with no effect on safety.</p>	5.5.3	<p>6.4.4</p> <p>6.8.1.h</p> <p>6.8.1.i</p>
ITS SPECIFICATION 5.5.4 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM			
A1	<p>Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.</p>	5.5.4	6.8.1.k
A2	<p>The CTS specifies that the ODCM must place limits on the operability of radioactive effluent monitoring instrumentation and treatment systems. ITS maintains the requirement and uses the term “function capability” to replace the CTS defined term. “Operability.” This is an equivalent administrative change.</p>	5.5.4	6.8.4.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.5 - COMPONENT CYCLIC OR TRANSIENT LIMIT			
	NONE		
ITS SPECIFICATION 5.5.6 - RCP FLYWHEEL INSPECTION PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS. This is an equivalent administrative change.	5.5.7	4.2
A2	The CTS statements of objective and applicability are not needed to describe the requirements established in ITS 5.5.7.	5.5.7	4.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require inspection of ASME Code Class 1, 2, and 3 components according to Section XI of the ASME Boiler and Pressure Vessel Code as required by 10 CFR 50, Section 50.55a(g). CTS expand this to address both inspections and testing. ITS 5.5.7 require establishing and maintaining a program for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports at frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code. This is an administrative change since 10 CFR 50.55a(f) already provides the regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves are the only components covered by an IST Program. In addition, 10 CFR 50.55a(g) already provides regulatory requirements for an Inservice Inspection (ISI) Program, and specifies that ASME Code Class 1, 2, and 3 components are covered by the ISI Program, and that pumps and valves are covered by the IST Program in 10 CFR 50.55a(f). This is an equivalent administrative change with no significant adverse effect on safety.</p>	5.5.7	4.2 4.2.1.3.b
A4	<p>CTS require inspection of ASME Code Class 1, 2, and 3 components according to Section XI of the ASME Boiler and Pressure Vessel Code with the implicit requirement that testing and inspections will be performed at the frequencies specified in the ASME Code. ITS add an explicit statement that allowances of ITS SR 3.0.2 apply to the testing and inspection frequencies specified in the ASME Code. This is an administrative change with no effect on safety because application of the equivalent allowance in CTS is the current practice. This is an administrative change with no effect on safety.</p>	5.5.7.b SR 3.0.2	4.2 4.1 1.12

Discussion of Change	Summary of Change	ITS Section	CTS Section
A5	CTS 4.2 is modified in ITS 5.5.7 by the addition of ITS 5.5.7.b which specifies that provisions of ITS SR 3.0.3 apply to inservice testing activities. ITS SR 3.0.3 allows a delay of the lesser of 24 hours or the specified SR frequency to perform a missed surveillance. The existing requirement in CTS allows no delay in entering actions when an SR is missed for a component with an AOT > 24 hours.	5.5.7 5.5.7.b SR 3.0.3 3.0	4.2 4.1
A6	ITS 5.5.7.a adds a table that clarifies testing Frequency nomenclature differences between Section XI of the ASME Boiler and Pressure Vessel Code and the ITS. For example, the ASME required Frequency of weekly is equated to the ITS required Frequency of at least once per 7 days. This is an equivalent administrative change with no effect on safety because ITS provide a reasonable interpretation of existing requirements.	5.5.7 5.5.7.a	4.2
ITS SPECIFICATION - 5.5.8 STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.8	4.9
A2	The CTS statements of objective and applicability are not needed to describe the requirements established in ITS 5.5.8.	5.5.8	4.9

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	Facility Operating License DPR-64, paragraph J, required an inspection of all four steam generators no later than March 31, 1982 and Nuclear Regulatory Commission approval before bringing the reactor critical following this inspection. This inspection was completed as required; therefore, this requirement does not apply. This is an equivalent administrative change with no effect on safety.	NONE	Facility Operating License DPR-64 paragraph J
A4	CTS specify that the first inservice inspection of SGs should be performed after six effective full power months but not later than completion of the first refueling outage. This inspection frequency is a one time only requirement that is no longer applicable. This is an equivalent administrative change with no effect on safety.	NONE	4.9.A.4.a
A5	ITS add a specific statement that the provisions of SR 3.0.2 apply to the SG Tube Surveillance Program test frequencies. This is an equivalent administrative change with no significant adverse effect on safety because it is consistent with the CTS and TSTF-118.	5.5.8.c.3 SR 3.0.2	4.9
A6	CTS specify that the SG tube inspection due no later than July 1996 may be deferred until the next refueling outage but no later than May 31, 1997. This allowance expires prior to scheduled ITS implementation. This is an equivalent administrative change with no effect on safety.	NONE	4.9.A.4.c footnote *
A7	Moved to LA Table		
A8	Not used.		
ITS SPECIFICATION 5.5.9 - SECONDARY WATER CHEMISTRY PROGRAM			

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.9	NONE
A2	Facility Operating License DPR-64, paragraph 2.I, requires implementation of a program to implement a secondary water chemistry monitoring program to inhibit SG tube degradation. ITS 5.5.9 maintains the same requirements. This is an equivalent administrative change with no effect on safety.	5.5.9	NONE
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.10	4.5.A
A2	The CTS statements of objective and applicability are not needed to describe the requirements established in ITS 5.5.10.	5.5.10	4.5.A
A3	CTS specify the surveillance frequency for visual inspections of the Containment Air Filtration System and CR Air Filtration System, respectively. These specifications include the requirement to perform a visual inspection "every six months for the first two years." This requirement is not needed because the period of applicability has expired. This is an equivalent administrative change with no effect on safety.	NONE	4.5.A.4.a 4.5.A.5.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
A4	CTS specify testing requirements for the Containment Air Filtration System and the CR Air Filtration System, respectively. ITS keeps these requirements except that the systems are identified as Containment FCUs and the CR Ventilation System, respectively. This is an equivalent administrative change with no effect on safety.	5.5.10	4.5.A.4 4.5.A.5
A5	CTS establish requirements for the maximum pressure drop across the specified filter trains. ITS keep this requirement, but, ITS add the clarification that the pressure drop test must include the prefilters. This clarification ensures that the surveillance test is conducted as close to accident conditions as possible. This is an equivalent administrative change because it is consistent with the intent of the CTS requirement and because doing this test with prefilters installed is consistent with current practice.	5.5.10.d	4.5.A.4.b.1 4.5.A.5.c.1 4.5.A.6.b.1
A6	CTS require performance of ventilation filter testing at any time fire or chemical releases...could alter their integrity. ITS clarify the requirement as after significant painting, fire, or chemical release “in any ventilation zone communicating with the system while it is in operation.” Inclusion of the clarification “in any ventilation zone communicating with the system while it is in operation” is an equivalent administrative change with no adverse effect on safety because it is an explicit statement of a reasonable interpretation of the existing requirement.	5.5.10	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B
A7	CTS state that direct and indirect measurements may be used to verify required air flow during surveillance testing. ITS 5.5.10 maintains the requirement to ensure that required air flow is established during testing but does not include the detail that direct and indirect measurements may be used. Elimination of this detail is an equivalent administrative change with no significant adverse effect on safety because this detail does not require or prohibit any particular method of measuring air flow.	5.5.10	4.5.A.4.b.2 4.5.A.5.c.2 4.5.A.6.b.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A8	<p>CTS filter testing for the containment purge system if fuel movement takes place < 421 hours after reactor shutdown, preface the 18 month frequency for filter testing with the statement "prior to fuel movement." ITS do not include this phrase because the applicability established by ITS LCO 3.9.3, establishes requirements for containment purge during refueling operations. ITS 5.5.10 does not need to clarify that SRs must be completed prior to entering the applicable mode of operation because ITS LCO 3.0.4 and ITS SR 3.0.4 prevent changes in modes or other specified conditions in the LCO applicability when an LCO or SR is not met. Thus, this is an equivalent administrative change with no effect on safety.</p>	<p>LCO 3.9.3 LCO 3.0.4 SR 3.0.4 5.5.10</p>	<p>4.13.B.1 4.13.B.2</p>
A9	<p>CTS establish the frequency for filter testing as prior to handling irradiated fuel with no specific time limit identified. This requirement is interpreted as a requirement to have completed required filter testing within 24 months prior to any fuel movement which is consistent with the other filter testing requirements and the intent of Regulatory Guide 1.52. This is an equivalent administrative change with no effect on safety since it maintains a requirement to perform filter testing prior to movement of irradiated fuel and adds the specific requirement that this testing be completed within 24 months prior to the movement of irradiated fuel.</p>	NONE	<p>4.5.A.6.b 4.5.a.6.c</p>
A10	<p>ITS include an explicit statement that allowances of ITS SR 3.0.2 apply to the Ventilation Filter Test Program. This is an administrative change with no effect on safety because the equivalent allowance is already provided by CTS Definition 1.12. This is an equivalent administrative change with no effect on safety.</p>	<p>5.5.12 SR 3.0.2</p>	1.12
<p>ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM</p>			

Discussion of Change	Summary of Change	ITS Section	CTS Section
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.11	4.1
A2	ITS 5.5.11 includes the allowance that SR 3.0.2 applies and this is equivalent to the allowance provided by CTS definition 1.12.	5.5.11	4.1
A3	ITS include an explicit statement that allowances of ITS SR 3.0.3 apply to the testing and inspection frequencies specified in the Explosive Gas and Storage Tank Radioactivity Monitoring Program required by ITS 5.5.11. This is an equivalent administrative change with no safety effect since the equivalent allowance is already provided by CTS 4.1. Differences between ITS SR 3.0.3 and CTS 4.1 are explained and justified with ITS Section 3.0. This is an equivalent administrative change with no effect on safety.	5.5.11 SR 3.0.3 3.0	4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.13 - TS BASES CONTROL PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)			
	NONE		
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.5.15	6.14
A2	CTS 6.14, Containment Leakage Rate Testing Program, is incorporated into ITS as ITS 5.5.15.	5.5.15	6.14

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	CTS specify that CTS Definition 1.12 is not applicable to containment leakage rate testing. ITS maintain this allowance with the statement that SR 3.0.2 is not applicable because testing frequencies are established by 10 CFR 50, Appendix J. This is an equivalent administrative change with no effect on safety.	5.5.15 SR 3.0.2	6.14 1.12
A4	CTS specify that CTS 4.1 applies to containment leakage rate testing. ITS 5.5.15 maintains a similar allowance by stating that ITS 3.0.3 is applicable. ITS SR 3.0.3 allows a delay of the lesser of 24 hours or the specified SR frequency to perform a missed surveillance. The existing requirement in CTS 4.1 allows no delay in entering actions when an SR is missed for a component with an AOT > 24 hours. This is an equivalent administrative change.	5.5.15 SR 3.0.3 3.0 3.0.3	6.14 4.1
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.6	6.9.1.3
A2	CTS requires a tabulation by job function of personnel exposures greater than 100 mrem/year. ITS maintains this requirement but clarifies that it includes only deep dose exposures.	5.6	6.9.1.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
A3	<p>CTS require a tabulation by job function of personnel exposures greater than 100 mrem/yr and include a list of the various monitoring instrumentation that may be used to measure personnel radiation exposure. ITS 5.6.1 maintains the same requirement with the additional clarification that electronic dosimeters may be used to measure exposures for the purpose of this tabulation. This change is acceptable because this tabulation is for performance evaluation only and neither CTS 6.9.1.3 nor ITS 5.6.1 are intended to establish any requirements for personnel protection. This is an equivalent administrative change with no effect on safety.</p>	5.6.1	6.9.1.3
A4	<p>CTS require a tabulation by job function of personnel exposures > 100 mrem/yr. ITS maintain the same requirement with the clarification that the report must be submitted by April 30 of each year. Clarification of the due date for submission of a report to the NRC is an equivalent administrative change with no safety effect.</p>	5.6.1	6.9.1.3
A5	<p>CTS require that an Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year be submitted prior to May 1 of each year. ITS maintain the same requirement except that the report must be submitted by May 15 of each year. A minor change to the due date for submission of a report to the NRC is an equivalent administrative change with no effect on safety.</p>	5.6.1	ETS 4.3.2.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
A6	<p>CTS require that a Radioactive Effluent Release Report must be submitted before May 1 of each year and must include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50. CTS further state that a full listing of the information to be contained in the Annual Radioactive Effluent Release Report is provided in the ODCM. ITS maintain the same requirement but do not include the statement that a full listing of the information to be contained in the Annual Radioactive Effluent Release Report is provided in the ODCM. This is acceptable because ITS specify that the material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50. Thus, deletion of this statement does not change any requirement. This is an equivalent administrative change with no effect on safety.</p>	5.6.3	4.3.2.1
A7	<p>CTS cross reference a statement that the ODCM provides a listing of special reporting requirements. This statement does not establish or modify any existing requirements and the format of the ITS does not require this type of cross reference. Therefore, this is an equivalent administrative change with no effect on safety.</p>	NONE	<p>ETS 4.3.1 6.9.2</p>
A8	Moved to LA Table		
A9	<p>ITS specify that a written report be submitted to the NRC if RA and associated Completion Times for restoration of required PAM instrumentation are not met. Adding specific requirements for a special report is an equivalent administrative change with no effect on safety.</p>	3.3.3	NONE

Discussion of Change	Summary of Change	ITS Section	CTS Section
A10	<p>Facility Operating License DPR-64, paragraph 2.C(4), specified that results of the UT inspection of pressurizer weld L-1 must be reported to the NRC and approval of the results obtained prior to return to power operation following the second refueling shutdown. This requirement was completed as required; thus, this requirement is unnecessary. This is an equivalent administrative change with no effect on safety.</p>	NONE	4.2.5.f
A11	<p>Facility Operating License DPR-64, paragraph 2.O, specified that an evaluation, status and schedule for completion of balance of plant modifications as outlined in letter dated February 12, 1983, must be forwarded to the NRC by January 1, 1984. This requirement was completed as required; therefore, this requirement is unnecessary. This is an equivalent administrative change with no effect on safety.</p>	NONE	NONE
A12	<p>CTS require that a special report be submitted for an inoperable wide range plant vent monitor or main steam line radiation monitor. CTS require that a special report be submitted for an inoperable containment high-range radiation monitor. A requirement for submittal of a special report for these specific monitors is not included in the ITS because these monitors are post accident monitoring instrumentation required by Regulatory Guide 1.97 and are governed by ITS 3.3.3, PAM Instrumentation. As such, requirements for submittal of a Post Accident Monitoring Report in the event of the inoperability of these instruments is included in ITS 3.3.3 with the details in ITS 5.6.7. This is an equivalent administrative change with no effect on safety.</p>	<p>3.3 5.6.7</p>	<p>6.9.2.d 6.9.2.h</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA			
A1	Revised numbering, incorporated editorial changes, and reformatted in accordance with Westinghouse Standard Technical Specifications (STS), NUREG-1431; and adopted certain plant specific wording preferences or conventions that do not result in technical changes. Replaced Current Technical Specification (CTS) Bases with comprehensive ITS Bases which reflect plant specific design, analyses, and licensing basis, consistent with the STS.	5.7	6.12
A2	The CTS identifies duties and responsibilities using IP3 specific job titles. ITS uses generic titles consistent with ANSI N18,1-1971 and /or Reg Guide 1., 1975.	5.7	6.12

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section
M1	<p>CTS say that refueling exists only when the vessel head is completely unbolted. ITS specify that refueling exists when one or more reactor vessel head closure bolts are less than fully tensioned. This change is needed because assumptions regarding the RCS boundary may not be met when one or more bolts are detensioned. This change is acceptable because ITS LCO Applicability statements carefully differentiate between LCOs that apply during refueling and those that apply when the reactor vessel head is seated on the vessel. Any technical changes to existing requirements are identified and justified with the applicable LCOs. Thus, this change has no significant adverse safety effect.</p>	Table 1.1-1	1.2.5
M2	<p>The CTS definition of Core Alterations does not classify any functions normally performed during conventional reactor operation in accordance with equipment design as a core alteration. The ITS definition includes the movement of any fuel, sources, or reactivity control components. Therefore, control rod movement is a core alteration under ITS. This change is needed because the term Core Alteration is used to describe conditions in Mode 6 when reactivity excursions and/or fuel handling accidents are more likely to occur. Therefore, control rod movement is classified as a Core Alteration because of the potential to add positive reactivity. This change is acceptable because preventing positive reactivity insertion by control rod movement when Core Alterations are prohibited is conservative.</p>	Table 1.1-1	1.2.5

Discussion of Change	Summary of Change	ITS Section	CTS Section										
M3	<p>The CTS definition of \bar{E}-Average Disintegration Energy limits \bar{E} to noble gases with half-lives > 10 minutes when calculating acceptance criteria for reactor coolant gross activity. ITS are based on the ITS definition of \bar{E}. Unlike the CTS definition, the ITS definition includes all reactor coolant isotopes, except iodines, with half lives > 10 minutes, making up at least 95% of the total non-iodine activity in the coolant. This change is needed because ITS require counting contributions from isotopes other than noble gases. Therefore, this change has no significant adverse effect on safety.</p>	<p>3.4.16.1 LCO 3.4.16 SR 3.4.16.2</p>	<p>1.14 3.1.D.1</p>										
M4	<p>The ITS use the following defined terms that are not part of the CTS:</p> <table border="0" data-bbox="535 678 1402 873"> <tr> <td>Actions</td> <td>Axial Flux Difference (AFD)</td> </tr> <tr> <td>Trip Actuating Device Operational Test Mode</td> <td>Physics Tests</td> </tr> <tr> <td>La</td> <td>Slave Relay Test</td> </tr> <tr> <td>Leakage</td> <td>Staggered Test Basis</td> </tr> <tr> <td></td> <td>Master Relay Test</td> </tr> </table> <p>Although changes in definitions could change TS requirements, adding definitions used in ITS LCOs or Surveillances but not used in the CTS more explicitly define requirements. Therefore, this is a More Restrictive change with no significant adverse effect on safety.</p>	Actions	Axial Flux Difference (AFD)	Trip Actuating Device Operational Test Mode	Physics Tests	La	Slave Relay Test	Leakage	Staggered Test Basis		Master Relay Test	1.0	NONE.
Actions	Axial Flux Difference (AFD)												
Trip Actuating Device Operational Test Mode	Physics Tests												
La	Slave Relay Test												
Leakage	Staggered Test Basis												
	Master Relay Test												

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	<p>CTS define "Hot Shutdown" as subcriticality by an amount \geq the shutdown margin (SDM). Thus, $SDM \geq 1.3\% \Delta k/k$ in Mode 3 or 4. ITS specifies the reactivity condition needed to be in Mode 3 and/or 4 is $k_{eff} < 0.99$. ITS keep the requirement to have $SDM \geq 1.3\% \Delta k/k$ for Modes 3 and 4; otherwise, RAs are implemented. The difference between CTS and ITS is the reactivity level defining transition between Modes 2 and 3. The CTS transition is when the reactor is subcritical by $<$ the required SDM. The ITS transition is when the reactor is subcritical by $< 1.0\% \Delta k/k$, with LCO 3.1.1, which requires $SDM \geq 1.3\% \Delta k/k$ in Modes 3 and 4 and in Mode 2 when k_{eff} is < 0.99. Eliminating SDM from the definition differentiates between reactor status and an associated LCO that the SDM must be $\geq 1.3\% \Delta k/k$ assumed as an initial condition for reactivity addition event analysis in Modes 3 and 4. This is consistent with industry practice. It is a More Restrictive change with no significant safety effect, since clarifying the CTS definition defines the requirement more explicitly.</p>	<p>LCO 3.1.1 TABLE 1.1-1</p>	<p>1.14 3.10 1.2.2 3.10.1.1 1.2.3 1.2.2</p>
M6	<p>CTS says that the reactor is in Hot Shutdown if it is subcritical and $T_{avg} > 200\text{ }^\circ\text{F}$ and $\leq 555\text{ }^\circ\text{F}$. However, CTS LCOs and associated Actions differentiate between Hot Shutdown when $> 350\text{ }^\circ\text{F}$ and Hot Shutdown $< 350\text{ }^\circ\text{F}$. ITS recognizes the CTS practice of differentiating between "Hot Standby" when $> 350\text{ }^\circ\text{F}$ and "Hot Shutdown" when $< 350\text{ }^\circ\text{F}$. Differentiating between Hot Standby and Hot Shutdown does not change any existing requirements. Changes to the Applicability of LCOs during the conversion from CTS to ITS are identified and justified with the applicable LCOs. This is a More Restrictive change because clarification to the CTS definition brings the definition into consistency with other more restrictive specifications.</p>	<p>1.0 Table 1.1-1</p>	<p>1.2.2</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M7	<p>The CTS "Instrument Channel Calibration" definition requires adjusting output to respond to known parameter values. CTS also specify that calibration must encompass the entire channel and include the channel functional test. ITS keep these requirements with the following clarifications: only required alarms, interlocks, displays, and trip functions must be verified operable; a calibration may be done using a series of sequential, overlapping calibrations or total channel steps so the entire channel is calibrated; calibration of instrument channels with resistance temperature detectors or thermocouple sensors may consist of in place qualitative assessment of sensor behavior and normal calibrations of the remaining adjustable devices in the channel; and when a sensing element is replaced, the next required Channel Calibration must include in place cross calibration comparing the other sensing elements with the recently installed element. This is a More Restrictive change with no significant safety effect because clarifying the CTS defines requirements more explicitly.</p>	1.0	1.9.3
M8	<p>The CTS definition of "Logic Channel Functional Test" requires operation of relays or switch contacts in all the combinations needed to produce the required output. The equivalent ITS Definition, "Actuation Logic Test," keeps these requirements except for the following: ITS clarify that the verification of the required logic output must include each possible interlock logic state; and ITS clarify that the test must include a continuity check of output devices. This is a More Restrictive change with no significant safety effect, because clarifications to the CTS definition define requirements more explicitly.</p>	1.1	1.9.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
M9	<p>The ITS includes the following sections that are not included in the CTS: Section 1.2 - Logical Connectors; Section 1.3 - Completion Times; and, Section 1.4 - Frequency. The reason for these additional sections is that some conventions in the application of Technical Specifications to unusual situations have been the subject of debate and different interpretations between the licensees and the NRC Staff. Because the guidance in these proposed sections establishes positions not previously documented, this change is considered More Restrictive with no adverse effect on plant safety. These sections are consistent with the Westinghouse STS, NUREG-1431, Revision 1.</p>	<p>1.2 1.3 1.4</p>	<p>NONE.</p>
M10	<p>CTS 1.18 is the definition of Shutdown Margin (SDM). The ITS maintain the CTS definition but includes the clarification that if any RCCA is not capable of being fully inserted, then the reactivity worth of that RCCA must be accounted for in the determination of SDM. This is a More Restrictive change because clarification of a definition explicitly defines requirements. However, the clarification provided in the ITS definition is consistent with requirements in CTS 3.10.7 and CTS 3.10.4 for operation with an inoperable control rod.</p>	<p>3.1.5 3.1.6 1.0</p>	<p>1.18 3.10.7 3.10.4</p>
M11	<p>CTS define SDM. The ITS maintain the CTS definition, but includes the clarification that in Modes 1 and 2, the fuel and moderator temperatures are assumed to be at the hot zero power level. This is consistent with current assumption and practice. This is a More Restrictive change with no significant adverse effect on safety because clarification of a definition explicitly defines requirements.</p>	<p>1.0</p>	<p>1.18</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M12	<p>The CTS definition of SDM specifies that it is based on the reactivity worth of all “full length” rod cluster assemblies. The ITS definition does not require that the reactivity worth of partial length rods not be credited. The IP3 design does not use partial length control rod assemblies. This is a More Restrictive change with no significant adverse effect on safety because clarification of a definition explicitly defines requirements.</p>	1.0	1.18

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	ITS Section	CTS Section
M1	Adds explicit, more restrictive, action requirements in the event a Safety Limit (SL) is exceeded.	SL 2.2.1	6.7.1.a 3.0

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

Discussion of Change	Summary of Change	ITS Section	CTS Section
M1	This change limits changes in Modes or other conditions specified in LCO applicability if the LCO or SR is not met. It prevents placing the plant in a mode or other specified condition stated in the applicability when conditions are such that the requirements of the LCO would not be met if the LCO were entered.	LCO 3.0.4 SR 3.0.4	NONE
M2	CTS specify that SRs be performed within the surveillance interval with a maximum extension not > 25% of the interval. ITS keep this requirement with the additional restriction that the extension apply to neither SRs with a Frequency of "once," nor to the initial performance of RAs with Completion Times requiring subsequent periodic performance.	SR 3.0.2	1.12

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN			
M1	Shutdown margin applicability modified to add requirement for Mode 5. Also modified to recognize that Mode 1 and Mode 2 with K_{eff} greater than or equal to 1, is covered by shutdown and control bank limits.	LCO 3.1.1	3.10.1.1
M2	Surveillance added to verify that shutdown margin is within limits.	SR 3.1.1.1	3.10.1.1
ITS SPECIFICATION 3.1.2 - CORE REACTIVITY			
	NONE		
ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)			
M1	Requirement expanded to include lower limit for moderator temperature coefficient. (Specified in the Core Operating Limits Report).	LCO 3.1.3	3.1.C.1
M2	Surveillance added to verify that moderator temperature coefficient is within upper limit; once prior to entering Mode 1 after each refueling.	SR 3.1.3.1	3.1.C.1
M3	Surveillance added to verify the moderator temperature coefficient lower limit that is now specified per item 3.1.3.M.1.	SR 3.1.3.2	3.1.C.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS			
M1	Add plant shutdown requirement if one or more rods are slow or not trippable.	3.1.4	3.10.7.2
M2	Add required action to verify shutdown margin for condition involving misaligned rod.	3.1.4	3.10.5.1
M3	ITS modifies completion time for required action in response to a misaligned rod. CTS allows 2 hours to check core peaking factors and requires power reduction if not within limits. The ITS requires power reduction within 2 hours and then allows 72 hours to check core peaking factors.	3.1.4	3.10.5.1
M4	ITS modifies CTS required action for condition involving misaligned rod with core peaking factors not determined. CTS requires that the high flux trip setpoint be reduced to <85% of RTP. The ITS requires a power reduction to less than or equal to 75% RTP.	3.1.4	3.10.5.2
M5	Reduce completion time from 14 hours to 6 hours for placing the reactor in Mode 3 for a condition involving more than one rod within alignment limits.	3.1.4	3.10.5.3 3.10.7.2
M6	Modify surveillance frequency for rod drop time testing to include the requirement that testing be performed prior to reactor criticality after each removal of the reactor head.	SR 3.1.4.3	3.10.8 Table 4.1-3
ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS			

Discussion of Change	Summary of Change	ITS Section	CTS Section
M1	Required Actions and Completion Times added for the shutdown bank insertion limit requirement.	LCO 3.1.5.1	3.10.4.1
M2	Surveillance added for periodic verification that shutdown bank insertion limits are met.	SR 3.1.5.1	3.10.4.1
ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS			
M1	Required Actions and Completion Times added for the Control Bank Insertion Limit requirement.	3.1.6	3.10.4.2
M2	Surveillance Requirements added for periodic verification of control bank insertion limits.	SR 3.1.6.1 SR 3.1.6.2	3.10.4.2
ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION			
M1	Surveillance frequency modified to apply prior to reactor criticality after each removal of the reactor head.	SR 3.1.7.1	Table 4.1-1
M2	Required Actions modified to clarify that only movable incore detectors are suitable to verify rod position.	LCO 3.1.7	3.10.6.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2			
M1	Added limitations that LCO exemptions during physics testing are only permitted if reactor power is maintained less than or equal to 5% RTP. Also added required actions and surveillance pertaining to the limit on reactor power level.	LCO 3.1.8 SR 3.1.8.3	3.10
M2	Specified a time limit (1 hour) for use of LCO exemptions permitted by ITS LCO 3.1.8 for physics testing, if SDM is not met.	3.1.8	3.10.1.1 3.10.1.2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$)			
M1	CTS specifies that $F_Q(Z)$ must be confirmed to be within required limits following refueling and every full power month thereafter. ITS maintains these requirements. However, ITS requires that the post refueling verification is completed "prior to exceeding 75% rated thermal power" on the first startup following refueling and requires that $F_Q(Z)$ is verified within 12 hours after achieving equilibrium conditions after exceeding, by $\geq 10\%$ RTP, the Thermal Power at which $F_Q(Z)$ was last verified.	SR 3.2.1.1	3.10.2.2
M2	CTS 3.10.2.2 specifies that if $F_Q(Z)$ limits are not met, then reactor power must be reduced so as not to exceed a fraction of rated power equal to the ratio of the $F_Q(Z)$ limit to measured value; however, no completion time is specified. ITS maintains this requirement; however, a Completion Time of 15 minutes after each $F_Q(Z)$ determination is specified.	3.2.1	3.10.2.2.2
M3	CTS requires a proportional reduction in reactor power and high flux trip setpoints if limits for $F_Q(Z)$ are not met. However, no requirement for a proportional reduction of the Overpower ΔT trip setpoints is specified. ITS adds a requirement for a reduction in the Overpower ΔT trip setpoints.	3.2.1	3.10.2.2.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.2.2 - NUCLEAR ENTHALPY RISE H.F.C			
M1	CTS specifies that $F_{\Delta H}^N$ must be confirmed to be within required limits following refueling. ITS maintains the same requirement except that confirmation must be completed "prior to exceeding 75% rated thermal power" on the first startup following refueling.	SR 3.2.2.1	3.10.2.2
M2	CTS requires a proportional reduction of the reactor power and the high neutron flux trip setpoint if a hot channel factor (i.e., $F_{\Delta H}^N$) exceeds its specified limit. Under the same conditions, ITS requires reducing thermal power to < 50% RTP and reducing the Power Range Neutron Flux — High trip setpoints to \leq 55% RTP (versus the proportional reduction required by CTS).	3.2.2	3.10.2.2.2
M3	CTS requires a proportional reduction in reactor power and trip setpoints if limits for $F_{\Delta H}^N$ are not met and requires subsequent verification that these actions were effective. However, there are no explicit requirements for returning to full power if appropriate conditions can be established. ITS maintains these requirements and specifies that reactor power and trip setpoint reductions may be restored only after a determination that $F_{\Delta H}^N$ is within limits prior to exceeding specified reactor power levels.	3.2.2	3.10.2.2.2
M4	CTS requires a proportional reduction in reactor power and trip setpoints if limits for $F_{\Delta H}^N$ specified in COLR are not met and requires subsequent verification that these actions were effective; however, there is no explicit option for restoration of the LCO requirement. ITS maintains these requirements and includes a Note on restoration of the LCO requirements and even if the restoration is completed within the specified Completion Time without the need for a power reduction.	3.2.2	3.10.2.2.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)			
M1	CTS provides the allowance that AFD does not have to be maintained within the specified band during excore calibration procedures. ITS maintains this but limits this allowance to 16 hours during each SR interval.	3.2.3	3.10.2.4
M2	CTS specifies that if the AFD monitor alarm is not functional, then verifications that AFD target band is being met must be logged at specified frequencies. ITS maintains these requirements and establishes more restrictive Frequencies based on rated thermal power.	SR 3.2.3.2	3.10.2.8
M3	CTS does not establish any requirement or operator verification that AFD is within required limits when the AFD monitor alarm is functional. ITS requires verification that AFD is within the required target band for each Operable excore channel at a specified Frequency.	SR 3.2.3.1	3.10.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION - 3.2.4 QUADRANT POWER TILT RATIO			
M1	CTS require a proportional power reduction if QPTR limits are not met and requires reducing thermal power to < 50% RTP if the tilt condition is not eliminated within 24 hours. ITS retains the requirement for a proportional power reduction if QPTR limits are not met; however, ITS requires verification within 12 hours that QPTR limits are met and requires additional proportional power reductions if QPTR limits are not met .	3.2.4	3.10.3.1.a 3.10.3.1.b
M2	CTS establishes requirements for QPTR to ensure that the margins for uncertainty for $F_Q(Z)$ and $F_{\Delta H}^N$, which cannot be continuously monitored, are not exceeded. However, CTS does not include any requirements to verify that exceeding QPTR limits is not causing ITS $F_Q(Z)$ and $F_{\Delta H}^N$ to be not met. Under the same Conditions, ITS requires accelerated verification that $F_Q(Z)$ and $F_{\Delta H}^N$ are being met .	3.2.4 3.2.1 3.2.2	3.10.3
M3	CTS establishes requirements for QPTR; however, there are no CTS requirements for the periodic verification that QPTR limits are met because CTS requires the operation of the tilt deviation alarm set to alarm within the QPTR LCO limit. ITS SR 3.2.4.1 adds the requirement to periodically verify that QPTR is within limits.	SR 3.2.4.1	3.10.3

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION			
M1	<p>ITS 3.3.1, Function 4, SRM Flux), and ITS 3.3.1, Function 3, IRM Flux, are added to require one channel of the SRM and one channel of the IRM trip function (as described in ITS 3.3.1, DOCs A.6 and A.7). This change is needed since these functions provide redundant protection to the Power Range Neutron Flux — Low Setpoint trip Function for an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. One channel is acceptable since administrative controls also prevent uncontrolled rod withdrawal. This change is acceptable since it does not introduce any operation which is unanalyzed while requiring more conservative requirements for redundant protection to the Power Range Neutron Flux — Low Setpoint trip Function for an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. Therefore, this change has no adverse effect on safety.</p>	<p>3.3.1 Function 3 Function 4</p>	None

Discussion of Change	Summary of Change	ITS	CTS
M2	<p>CTS require one operable channel with a minimum zero redundancy. ITS require two operable channels so that no single random failure will disable the manual reactor trip function. This more restrictive change is needed since the manual reactor trip function is designed with redundant capability although functions such as manual reactor trip are not specifically credited in the accident safety analysis. Redundancy is needed since this function is qualitatively credited in the safety analysis and the licensing basis. In addition, manual trip functions protect for conditions that do not require dynamic transient analysis to demonstrate function performance. Manual functions also serve as backups to functions that were credited in the accident analysis. In conjunction with the new requirement for two manual trip channels, ITS will allow 48 hours to restore an inoperable channel when one of two channels is inoperable. The 48-hour CT is reasonable considering that there are two automatic actuation trains and another manual initiation channel operable, and the low probability of an event occurring during this interval. This change does not introduce any operation which is un-analyzed while requiring redundant manual reactor trip capability. Thus, this change has no adverse effect on safety.</p>	<p>3.3.1 Function 1</p> <p>LCO 3.3.1 RA B.1 RA C.1</p>	Table 3.5-2

Discussion of Change	Summary of Change	ITS	CTS
M3	<p>CTS have no manual trip Applicability, but imply it by requiring hot shutdown if requirements are unmet. ITS have this function operable in Modes 1 and 2 and Modes 3 to 5 if Rod Control can withdraw rods or rods are not inserted fully. This is more restrictive. It is needed since having manual trip is prudent with rods not inserted fully. In addition, inadvertent withdrawal is possible unless CRDS cannot withdraw rods in Modes 3 to 5. Besides expanding Applicability, ITS require rods be inserted fully, and CRDS be unable to withdraw rods with Mode 3 to 5 requirements or CTs unmet. Though ITS 3.3.1, Condition C, applies when one of two manual trip functions is inoperable, RAs C.2.1 and C.2.2, and the 48- hour AOT apply when both manual trip channels are inoperable in Modes 3 to 5 since defaulting to LCO 3.0.3 does not put the plant outside Applicability. This is acceptable since probability of an event requiring manual trip when in these Modes is low. This change introduces no un-analyzed operation while requiring manual trip capability when Rod Control can withdraw rods or rods are not fully inserted. This change has no adverse safety effect.</p>	<p>3.3.1 Function 1 Table 3.3.1-1 Note a</p> <p>3.3.1 RA C.2.1</p> <p>3.3.1 RA C.2.2</p> <p>3.3.1 Condition C</p> <p>LCO 3.0.3</p>	<p>3.5 Table 3.5-2</p>

Discussion of Change	Summary of Change	ITS	CTS
M4	<p>In Mode 2, ITS establish a new requirement to perform a COT within 4 hours after reducing power below the P-6 setpoint . In addition, ITS include a new requirement to perform a COT within 12 hours after reducing power below the P-10 setpoint. These changes ensure that the COT will verify function operability if the plant expects to stay critical, while allowing this SR to be skipped if shutdown will be completed promptly. Finally, when in Modes 3, 4 or 5 with CRD system capable of rod withdrawal and one or more rods not fully inserted, ITS establish a new requirement to perform a COT for ITS 3.3.1, Function 4, within 4 hours after entering Mode 3 from Mode 2 and every 92 days thereafter. This change is needed since the source range trip is the only RPS automatic protection function required in MODES 3, 4, and 5. This change is acceptable because it does not introduce any operation which is un-analyzed while prompt verification of the operability of the required IRM and SRM trip functions after entering the Applicable mode. This change has no adverse effect on safety.</p>	<p>SR 3.3.1.7 SR 3.3.1.8</p> <p>3.3.1 Function 3</p> <p>3.3.1 Function 4</p>	None

Discussion of Change	Summary of Change	ITS	CTS
M5	<p>This change subtracts four hours from the time required to initiate shutdown when RPS instrument channel redundancy requirements are unrestored in required CT or there is loss of a required RPS instrument trip function. If redundancy or minimum channel number requirements are unmet, CTS have plant maintain or proceed to hot shutdown within four hours. IP3 interprets this as starting shutdown within four hours and being complete in four to six. ITS, however, allow 6 or 7 hours to be in Mode 3. This is needed with instrument function loss since it ensures the plant is outside Applicability promptly when a safety function assumed in the accident analysis is inoperable. This is needed when requirements for RPS instrument channel redundancy are unrestored within required CT to ensure WCAP -10271-P-A assumptions are met regarding availability of required RPS functions. This change introduces no un-analyzed operation while ensuring Applicable Mode is exited promptly when requirements for RPS instrument redundancy or availability are unmet. This change has no adverse safety effect.</p>	<p>LCO 3.3.1 RAs</p> <p>LCO 3.0.3</p>	Table 3.5-2

Discussion of Change	Summary of Change	ITS	CTS
M6	<p>CTS Table 3.5-2 (footnote *** which governs the undervoltage and shunt trip) requires that a channel be restored to operable within 72 hours if either the undervoltage and shunt trip (not both) are inoperable (i.e., trip capability maintained but redundancy lost). Under the same conditions (loss of redundancy but not trip function in Modes 1 and 2), ITS LCO 3.3.1, Actions O.1, allows 48 hours to restore a channel to operable. This change is made to establish consistency with CTs for loss of redundancy with similar Functions such as manual trip capability. The CT of 48 hours for Required Action O.1 is reasonable because there is one remaining diverse feature for the affected RTB in this Condition, and there is one operable RTB capable of performing the safety function and there is a low probability of an event occurring during this CT. This change is acceptable since it does not introduce any operation which is un-analyzed while requiring more timely action if there is a loss of redundancy in reactor trip capability. Therefore, this change has no adverse effect on safety.</p>	LCO 3.3.1 RAs	Table 3.5-2 Footnote ***

Discussion of Change	Summary of Change	ITS	CTS
M7	<p>CTS do not include explicit requirements for Channel Calibration of the Power Range Neutron Flux, IRM Flux, or SRM Flux, respectively, although the trip setpoints are verified as part of the operational tests. ITS SR 3.3.1.11 is added to require a Channel Calibration of these trip functions every 24 months. For the power range detectors, Channel Calibration consists of both a normalization of the detectors based on a power calorimetric and a flux map performed above 15% RTP. For the source range and intermediate range neutron detectors, Channel Calibration consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. This change is acceptable because it does not introduce any operation which is un-analyzed while establishing an explicit requirement for periodic calibration of the source, intermediate and power range nuclear detectors.. Therefore, this change has no adverse effect on safety.</p>	SR 3.3.1.11	<p>Table 4.1-1 Item 1</p> <p>Table 4.1-1 Item 2</p> <p>Table 4.1-1 Item 3</p>
M8	Not used.		
M9	<p>ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feed Flow Mismatch is not required by CTS. The function is added to ITS because it provides a diverse trip, in conjunction with Function 13, in response to the loss of feedwater event.</p>	3.3.1, Function 14	N/A

Discussion of Change	Summary of Change	ITS	CTS
M10	<p>CTS specify that reactor trips on low pressurizer pressure, high pressurizer level, low reactor coolant flow for two or more loops, and turbine trip must be unblocked when specified conditions are met. CTS specify that single loop loss of flow reactor trips may be bypassed when the power range nuclear instrumentation indicates < 50% RTP. Although each of these requirements is enforced by an automatic interlock function, CTS do not explicitly require operability of the interlock function. ITS 3.3.1, Function 17, Reactor Protection System Interlocks, is added to require operability of the following: 17.a, Intermediate Range Neutron Flux) Interlock; 17.b, Low Power Reactor Trips Block Interlock; 17.c, Power Range Neutron Flux Interlock; 17.d. Power Range Neutron Flux Interlock; and 17.e, Turbine First Stage Pressure interlock. If any of these interlocks is not operable, ITS require that the interlock be established consistent with plant conditions. This is consistent with the CTS requirements. Thus, this change has no adverse safety effect.</p>	<p>3.3.1 Function 17</p> <p>3.3.1 RA M.1</p> <p>3.3.1 RA N.1</p>	<p>2.3.2.A</p> <p>2.3.2.B</p>

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION			
M1	<p>CTS require only one operable channel with zero redundancy for ESFAS manual initiation functions. ITS increase the requirement for each function to two operable channels. ITS also set Conditions, RAs, and CTs requiring redundancy be re-established in 48 hours if one is inoperable. This change is needed, since manual ESFAS initiation functions provide redundancy. Redundancy is needed since these functions are qualitatively, though not specifically, credited in the safety analysis and licensing basis. In addition, manual initiation functions protect for conditions that do not require dynamic transient analysis to demonstrate function performance. Allowing a 48-hour restoration time when one channel is inoperable is acceptable since the remaining operable channel is adequate to perform the safety function. The CT is reasonable since there are two automatic actuation trains and another manual initiation channel operable, and since probability of an event during this interval is low. This change does not introduce any unanalyzed operation while requiring redundant manual ESFAS trip capability. This more restrictive change has no adverse effect on safety.</p>	LCO 3.3.2 RAs	Table 3.5-3 Table 3.5-4

Discussion of Change	Summary of Change	ITS	CTS
M2	<p>For the High Steam Flow Function, IP3 design has two channels per line of high steam flow and one channel per line in any two lines is sufficient to actuate. CTS require one channel per line in each of three lines and a minimum redundancy of one channel per line in each of three lines. ITS restate the requirement for minimum operable channels as two per line. Requiring two channels per line on all four lines is a more restrictive change. CTS requirements for two channels per line in only three of four lines is acceptable since this function protects against a steam line break. This configuration maintains single failure tolerance since a line break will cause the flow in the intact lines to increase to levels above trip setpoint to maintain turbine load. Thus, even with a single failure of the function in one line and the break in a second line, flow in the remaining lines will increase sufficiently to actuate. ITS increase the requirement for minimum operable channels as two per line on all four lines to conform to WCAP-10271 which justifies extended AOT and surveillance test intervals. However, requiring this function to be operable with a minimum number of channels on all four lines justifies the AOT and STI extensions on a four loop plant even without WCAP-10271. This change is acceptable since it does not introduce any operation which is un-analyzed while requiring greater redundancy in trip capability for this function. Thus, this change has no adverse safety effect.</p>	3.3.2 Function 4.d	Table 3.5-3

Discussion of Change	Summary of Change	ITS	CTS
M3	<p>CTS require one operable channel with zero redundancy for AFW initiation on undervoltage function. IP3 design is that a non-SI blackout sequence signal from 480V bus 3A starts motor driven AFW pump 31 and a non-SI blackout sequence signal from 480V bus 6A starts motor driven AFW pump 33. In addition a non-SI blackout sequence signal from 480V bus 3A or 6A starts turbine driven AFW pump 32. Thus, CTS require one channel from either 480V bus 3A or 480V bus 6A. In addition, CTS specify that this function is required to start the turbine driven AFW Pump only. ITS require one channel per bus and 2 busses, and the ITS Bases indicate that this function is required to start the turbine driven AFW pump. Requiring two channels of this function is the minimum configuration to ensure that single failure of an initiation channel will not cause function loss. This increases redundancy for a function assumed to mitigate loss of feedwater flow. Operating without single failure tolerance during the 48-hour AOT is acceptable since the function is a Non-SI start of the AFW; and, other ESFAS functions, in particular SG Water Level — Low Low, protect against loss of heat sink. This is acceptable because it does not introduce any unanalyzed operation while requiring greater redundancy for a function assumed to mitigate a loss of feedwater flow event. Thus, this change has no adverse effect on safety.</p>	<p>3.3.2</p> <p>Function 6.d</p>	<p>Table 3.5-3</p> <p>Table 3.5-3 Item 3.b</p>

Discussion of Change	Summary of Change	ITS	CTS
M4	<p>CTS require one operable channel with a minimum redundancy of zero for the AFW pump start on main feedwater pump trip. The design is that a single channel associated with each operating MBFP starts both motor driven AFW pumps. ITS require one channel per operating main feed pump. In conjunction with this change, ITS require that if one of the two required channels is inoperable, then both channels must be made operable within 48 hours. This change is needed since the purpose of this function is to ensure that water is provided to a steam generator to serve as the heat sink. By requiring 1 channel per operating main feed, the IP3 design will provide single failure tolerance for this Function during normal operation (both MBFPs are operating) because single failure tolerance exists only if both MBFPs are operating. Operating without single failure tolerance when only one MBFP is operating and during the 48 hour allowable out of service time is acceptable because the Function is a Non-Safety Injection start of the AFW and other ESFAS Functions, in particular SG Water Level — Low Low, provide the primary protection against a loss of heat sink (i.e., loss of feedwater) event. This change is acceptable because it does not introduce any operation which is un-analyzed while requiring that the trip of any operating MBFP initiate auxiliary feedwater. Therefore, this change has no adverse safety effect.</p>	LCO 3.3.2 RA I.2.1	Table 3.5-3

Discussion of Change	Summary of Change	ITS	CTS
M5	<p>CTS establish CTs to complete a reactor shutdown and cooldown or otherwise place the reactor outside Applicability for any ESFAS function for which the minimum number of operable channels and the minimum redundancy cannot be established. ITS revise the CTs for reactor shutdown and cooldown to be consistent with industry standards for these evolutions as established in NUREG-1431, Standard TS, Westinghouse Plants, Revision 1. These changes set CTs at the amount of time that permits the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is operable. This reduces thermal stresses on components of the RCS and the potential for a plant upset that could challenge safety systems under conditions that require the shutdown. These changes are acceptable because in lieu of taking RAs and meeting CTs in ITS 3.3.2, the plant could take the RAs prescribed by LCO 3.0.3 and the specified Completion Times are consistent with the CTs for reactor shutdown and cooldown if the plant shutdown is required by LCO 3.0.3. This change is acceptable since it does not introduce any operation which is un-analyzed while requiring plant shutdown be completed in within limits consistent with plant capability. Therefore, this change has no adverse effect on safety.</p>	LCO 3.3.2 RAs	<p>Table 3.5-3 Note 6</p> <p>Table 3.5-4 Note 1</p>
M6	<p>CTS establish a feedwater isolation function for the SI signal. However, the feedwater isolation function is also accomplished by a SG high-high water level signal. This signal protects against an excess feedwater flow accident that can result in positive reactivity addition. ITS Function 5.b is added to provide operability requirements, surveillances, and an instrument channel allowable value. This change does not introduce any new condition that is not analyzed and the new requirement is consistent with plant design as described in the FSAR.</p>	Function 5.b	Table 3.5-4 Item 3

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION			
M1	CTS does not identify Neutron Flux as a required instrument channel for PAM. This function is added to ITS because it was identified as a Reg Guide 1.97, Type A variable. Adding this Function to ITS 3.3.3 along with Required Actions, Completion Times, and Surveillance Requirements is a more restrictive change.	3.3.3	N/A
M2	CTS does not identify Containment Isolation Valve Position Indication as a required instrument channel for PAM. This function is added to ITS because it was identified as a Reg Guide 1.97, Type A variable. Adding this Function to ITS 3.3.3 along with Required Actions, Completion Times, and Surveillance Requirements is a more restrictive change.	3.3.3	N/A
M3	CTS does not identify Condensate Storage Tank Level Indication as a required instrument channel for PAM. This function is added to ITS because it was identified as a Reg Guide 1.97, Type A variable. Adding this Function to ITS 3.3.3 along with Required Actions, Completion Times, and Surveillance Requirements is a more restrictive change.	3.3.3	N/A
M4	CTS provides for a 48-hour deferral of actions required in response to PAM instrument requirements not met, if the reactor is subcritical when the condition is discovered. ITS eliminates the 48-hour deferral and uniformly imposes Required Actions and Completion Times (Mode 3 in 6 hours and Mode 4 in 12 hours) regardless of reactor status at the time of discovery.	Condition E	Table 3.5-5 Note 3

Discussion of Change	Summary of Change	ITS	CTS
M5	<p>CTS allows a 30 day AOT for loss of containment sump water level indication. ITS establishes a more restrictive AOT of 7 days to provide greater assurance that this function will be available to plant operators if needed to diagnose post accident conditions in containment.</p>	Condition C	Table 3.5-5 Note '+'
M6	<p>ITS adds surveillance requirements for the following PAM instrument channels; channel check and channel calibration for RCS Pressure, channel check and channel calibration for RCS hot leg and cold leg temperatures, channel check for containment water level (for wide range and for recirculation sump), and channel check for auxiliary feedwater flowrate</p> <p>This is a more restrictive requirement because CTS does not specify equivalent surveillances for these channels.</p>	SR 3.3.3.1	N/A
M7	<p>CTS establishes number of channels required for PAM instrumentation based on loss of function only. ITS increases the required number of channels to account for loss of redundancy. This more restrictive change establishes requirements for single failure tolerance and channel diversity that are not specified in CTS.</p>	Table 3.3.3-1	Table 3.5-5

Discussion of Change	Summary of Change	ITS	CTS
M8	ITS establishes Required Actions and Completion Times for inoperable channels that result in loss of redundancy as discussed in DOC M.7. This more restrictive change ensures that appropriate and timely actions are taken to restore the required number of operable channels so that single failure tolerance is maintained.	Condition D	N/A
M9	CTS requires that the reactor be placed in hot shutdown (mode 3) if Recirculation sump level instrumentation is not operable. This implies an Applicability of Modes 1 and 2. ITS establishes a more restrictive Applicability of Modes 1, 2, and 3.	3.3.3	Table 3.5-5 Note '+'
ITS SPECIFICATION 3.3.4 - REMOTE SHUTDOWN			

Discussion of Change	Summary of Change	ITS	CTS
M1	<p>ITS have remote shutdown LCOs for the instrumentation and controls necessary to place and maintain the reactor in Mode 3 for an extended time from a location other than the CR. This protects against the possibility that the CR becomes inaccessible. The remote shutdown instrumentation and controls required to be operable are identified in ITS. There are no equivalent requirements in the CTS, but FSAR Sections 1.3, 7.7, and 9.6 discuss the ability to shut down and maintain the reactor in a safe condition using controls outside the CR. The remote shutdown LCO applies in Modes 1, 2, and 3. In Modes 4, 5, and 6 the reactor is already subcritical and in a condition of reduced RCS energy. Considerable time is available to restore necessary instrument control functions if CR instruments or controls become unavailable. The addition of these requirements does not introduce any unanalyzed operation while requiring more conservative requirements for remote shutdown capability than currently required. Thus, this change has no adverse effect on safety.</p>	3.3.4	None

Discussion of Change	Summary of Change	ITS	CTS
M2	<p>With inoperable remote shutdown functions, the ITS RA is to restore function in 30 days. If unmet, the plant must be in Mode 3 in 6 hours and Mode 4 in 12. The CT is based on operating experience and low probability of an event requiring CR evacuation. The Actions are modified by two Notes. Note 1 excludes the Mode change restriction of LCO 3.0.4. This allows entry into an applicable Mode while relying on Actions though the Actions may eventually require shutdown. This is acceptable due to low probability of an event requiring remote shutdown, and since generally the equipment can be repaired during operation. Note 2 clarifies application of CT rules. Separate Condition entry is allowed for each remote shutdown instrumentation and control function. CTs will be tracked separately for each function starting from the time the Condition was entered for that function. These Actions and Notes do not introduce any unanalyzed operation while requiring more conservative requirements for remote shutdown capability than currently required. This has no adverse safety effect.</p>	<p>3.3.4 RA Note 1 Note 2 LCO 3.0.4</p>	None
M3	<p>ITS SR 3.3.4.1 is added to require that a Channel Check be performed every 31 days of those channels which are normally energized. The addition of this requirement is acceptable because it ensures that a gross failure of instrumentation has not occurred. It does not introduce any operation which is unanalyzed while requiring more conservative requirements for remote shutdown capability than is currently required. Thus, this change has no adverse effect on safety.</p>	SR 3.3.4.1	None

Discussion of Change	Summary of Change	ITS	CTS
M4	<p>ITS SR 3.3.4.2 is added to provide a requirement to verify every 24 months that each required remote shutdown control circuit and transfer switch performs the intended function. The addition of this requirement is acceptable because it ensures that, if the CR becomes inaccessible, the unit can be placed and maintained in Mode 3 from the local control stations. It does not introduce any operation which is unanalyzed while requiring more conservative requirements for remote shutdown capability than is currently required. Therefore, this change has no adverse effect on safety.</p>	SR 3.3.4.2	None
M5	<p>ITS SR 3.3.4.3 is added to require that a Channel Calibration be performed every 24 months on each remote shutdown instrumentation channel. The addition of this requirement is acceptable since it is a complete check of the instrument loop and sensor, and verifies that the channel responds to a measured parameter within the necessary range and accuracy. It does not introduce any operation which is unanalyzed while requiring more conservative requirements for remote shutdown capability than is currently required. Therefore, this change has no adverse effect on safety.</p>	SR 3.3.4.3	None

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION			
M1	<p>Applicability requirements for LOP DG start instrumentation are implied by CTS which say that instrument setpoints must meet requirements only when not in cold shutdown and that actions for inoperable DG when above cold shutdown are taken if the LOP DG start instrumentation is inoperable. CTS do not include RAs for shutdown or refueling, but do require, as a minimum, two of the four 480 V buses to be energized, and two DGs to be operable since autostart of the EDGs is not required in these Modes. ITS keep the requirement that LOP DG start instrumentation be operable above cold shutdown, but require that this instrumentation be operable when a DG is required to be operable This ensures that the LOP DG start instrumentation is operable whenever a DG is operable. This more restrictive change does not introduce any unanalyzed operation while ensuring that DG autostart instrumentation is operable when a DG is required to be operable. Thus, this change has no significant adverse safety effect.</p>	LCO 3.3.5	3.5.1 Table 3.5-3 Note 1 3.7.F.3 3.7.F.4

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION			
M1	<p>CTS require one operable channel of the Containment Radioactivity High function with a minimum degree of redundancy of zero. This creates a requirement for one channel of this function with a RA to close containment vent and purge valves immediately if the required channel is inoperable. ITS require that two channels be operable. In conjunction with this change, ITS require that if one of the two required channels is inoperable, it must be restored within seven days. Since the R-11 and R-12 containment radiation monitors measure different parameters, failure of a single channel may result in loss of radiation monitoring function for certain events. Although Containment Purge System isolation capability is not required to meet 10 CFR 100 during a fuel handling accident, this function backs up the filtering function assumed in the analysis and provides containment isolation following the event. This is acceptable since the containment radiation monitoring function is not the primary method of meeting 10 CFR 100. Thus, this change has no significant adverse safety effect.</p>	LCO 3.3.6 RA A.1	Table 3.5-4 Item 4

Discussion of Change	Summary of Change	ITS	CTS
ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS)			
M1	<p>CTS require that CRVS be operable in Modes 1 - 4. ITS add requirements for associated instrumentation. In conjunction with this change, Conditions and RAs address when one or more required channels are inoperable. RA A.1 allows seven days to restore operability if one channel or train is inoperable. The basis for this CT is the same as in LCO 3.7.11 for an inoperable CRVS train. If the channel or train cannot be restored within CT, CRVS must be put in the 10% incident mode since this accomplishes the actuation function and puts the unit in a conservative mode. Both CRVS trains are put in the 10% incident mode since both are controlled by one switch. RAs B.1.1 and B.1.2 specify that if two channels or trains of the same initiation function are inoperable, then CRVS must be put in the 10% incident mode immediately since this accomplishes the actuation instrumentation function and puts the unit in a conservative mode. The 72-hour CT for placing CRVS in the 10% incident mode is consistent with the 72-hour AOT in ITS 3.7.11 when both CRVS trains are inoperable. This change has no significant adverse safety effect.</p>	<p>LCO 3.7.11</p> <p>LCO 3.3.7</p> <p>RA A.1</p> <p>RA B.1.1</p> <p>RA B.1.2</p>	3.3.H.1

Discussion of Change	Summary of Change	ITS	CTS
M2	<p>CTS require that the CR ventilation system be operable in Modes 1 through 4. ITS add requirements for the associated actuation instrumentation, but there is no explicit requirement for periodic verification that channel logic and channel end devices (e.g., fan start capability, damper cycling, etc) are Operable. ITS SR 3.3.7.1 is added to require a Channel Operational Test of the CRVS automatic actuation logic and actuation relays. ITS SR 3.3.7.1 is added to require a Trip Actuating Device Operational Test (TADOT) of the CRVS end devices using the manual actuation channel. These changes are needed because they ensure that CRVS actuation instrumentation and associated end devices function as required. These changes do not introduce any unanalyzed operation while establishing an explicit requirement for periodic verification that channel end devices (e.g., fan start capability, damper cycling, etc) are operable. Therefore, this change has no significant adverse effect on safety.</p>	LCO 3.3.7	3.3.H.1

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS			
M1	CTS 3.1.H.6 requires reducing reactor power to $\leq 10\%$ if minimum RCS flow requirements cannot be met and requires verification that at least two reactor coolant pumps in operation. Under the same conditions, ITS 3.4.1, Required Action B.1, requires reducing reactor power to $\leq 5\%$; and, ITS LCO 3.4.4 requires four RCS loops operable and in operation when in Modes 1 or 2.	3.4.1 LCO 3.4.4	3.1.H.6 3.1.H.2 3.1.A.1.E
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY			
	NONE		
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS			
M1	CTS establish requirements for RCS temperature and pressure and system heatup and cooldown rate limits, but they do not specify required actions if these limits are not met. ITS establish specific requirements and completion times for restoration of pressure and temperature limits and for subsequent determinations that the RCS is acceptable for continued operation.	LCO 3.4.3	3.1.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	ITS adds the requirement for verification that operation is within limits every 30 minutes when RCS conditions undergo planned changes and during inservice leak and hydrostatic testing. ITS SR 3.4.3.1 is modified by a Note requiring this SR be performed only during system heatup, cooldown, and leak testing. Periodic verification of RCS pressure and temperature limits is not required in Modes 1 and 2.	SR 3.4.3.1	3.1.B
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2			
M1	CTS require 2 reactor coolant pumps (RCPs) in operation when the reactor is critical and above 2% rated power. They also require 4 reactor coolant loops in operation when above 10% rated power, and 4 RCPs in operation prior to withdrawal of any control banks. ITS 3.4.4, RCS Loops - Modes 1 and 2, clarifies these requirements.	3.4.4	3.1.A.1.e 3.1.A.1.f 3.1.A.1.b.2
M2	CTS set requirements for minimum number of reactor coolant loops Operable and in operation, but no surveillances are set to verify that this requirement is met. ITS verify every 12 hours that each RCS loop is in operation. The ITS Bases clarify that this requirement can be met using flow rate, temperature, or pump status monitoring sufficient to ensure that forced flow is removing heat.	SR 3.4.4.1	3.1.A.1.f 3.1.A.1.e
M3	CTS require RCPs in operation when the reactor is at specified power levels. ITS require that RCS loops be operable and in operation with the ITS Bases clarifying that this means an operable RCP in operation providing forced flow for heat transport and an operable steam generator (SG) in accordance with the SG Tube Surveillance Program.	LCO 3.4.4	3.1.A.1.f

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS require RCPs in operation when the reactor is at specified power levels except during natural circulation tests. ITS keeps requirements for RCPs in operation, but do not provide an exception for natural circulation tests. Natural circulation tests are not normally performed at IP3. Appropriate TS changes will be prepared and submitted if needed.	LCO 3.4.4	3.1.A.1.e
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3			
M1	CTS require 1 RCP in operation when the reactor is subcritical with RCS $T_{avg} > 350$ °F. They require 4 RCPs in operation before withdrawing control banks when the reactor is subcritical with RCS $T_{avg} > 350$ °F. ITS require 2 RCS loops operable in Mode 3 and 1 RCP in operation if control rods are incapable of withdrawal and 2 RCPs in operation if they are.	LCO 3.4.5	3.1.A.1.b.1 3.1.A.1.b.2
M2	CTS set requirements for RCP operation in Mode 3; however, no Actions are specified if the LCO is not met. ITS LCO 3.4.5, Conditions A, B, C and D, are added to establish required actions and completion times when fewer than the required number of RCPs are operable or operating. This change, a requirement for operable RCS loops instead of Operable RCPs, is clarified in the ITS Bases.	LCO 3.4.5 SR 3.4.5.2	3.1.A.1.b.1 3.1.A.1.b.2
M3	CTS allow all RCPs to be de-energized in Mode 3 for 1 hour provided no operations are allowed that would dilute RCS boron, and core outlet temperature is maintained at least 10°F below saturation temperature. ITS LCO 3.4.5, Note, provides the same allowance; however, ITS 3.4.5 limits the use of this allowance to once in any 8 hour period.	LCO 3.4.5	3.1.A.1.b.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS require RCP operation when RCS T _{avg} > 350°F. ITS expand this from RCPs operating to reactor coolant loops Operable and include the following: verify every 12 hours that minimum required RCS loops are in operation and SG secondary side water levels are acceptable; and, verify every 7 days that breaker alignment and indicated power are available to the required pump not in operation.	LCO 3.4.5 SR 3.4.5.1 SR 3.4.5.2 SR 3.4.5.3	3.1.A.1.b.1 3.1.A.1.b.2
M5	CTS prohibit control bank withdrawal unless a minimum number of RCPs are operating when the reactor is subcritical with T _{avg} > 350 °F. To achieve the same objective, ITS LCO 3.4.5 prohibits having the rod control system able to withdraw control rods unless a specified minimum number of RCPs are operating when in Mode 3.	LCO 3.4.5	3.1.A.1.b.2
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4			
M1	CTS allow all RCPs to be de-energized for 1 hour in Mode 4 even when RHR is not in service provided that: a) no operations are permitted that would cause RCS boron concentration dilution; and, b) core outlet temperature is maintained at least 10°F below saturation temperature. ITS keep the same allowance but limit its use once in any 8 hour period.	3.4.6 LCO 3.4.6	3.1.A.1.c
M2	CTS 3.1.A.1.c and 3.3.A.6 establish requirements for the minimum number of RCPs and/or RHR pumps that must be Operable and/or operating in Mode 4; however, no surveillance requirements are established to verify that these requirements are met. ITS LCO 3.4.6 requires periodic verification that requirements are met.	SR 3.4.6.1 SR 3.4.6.2 SR 3.4.6.3	3.1.A.1.c 3.3.A.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED			
M1	CTS allow all RHR pumps to be de-energized for 1 hour in Mode 5 provided that: a) no operations are permitted that would cause RCS boron concentration dilution; and, b) core outlet temperature is kept at least 10°F below saturation temperature. ITS keep the same allowance, but limit its use once in any 8 hour period.	LCO 3.4.7	3.1.A.1.d
M2	CTS 3.1.A.1.d and 3.3.A.7 establish requirements for a minimum number RHR pumps that must be in operation and/or Operable in Mode 5 with loops filled; however, no surveillance tests are established to verify that these requirements are met. ITS LCO 3.4.7 requires periodic verification that requirements are met.	LCO 3.4.7	3.1.A.1.d 3.3.A.7
M3	CTS allow an alternate means of decay heat removal in place of one or both RHR loops without time restrictions as long as the alternate means can maintain RCS temperature. This is a special allowance that may be used during maintenance, modifications, testing, inspection, or repair. ITS do not include this allowance.	LCO 3.4.7	3.3.A.7.b
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED			
M1	CTS lets the RHR pump required to be operating in Mode 5 to be OOS 1 hour. CTS also do not distinguish between filled and unfilled loops. ITS, on the other hand, reduce the allowance to 15 minutes with loops unfilled. ITS also prohibit draining with an RHR loop not in operation and provide periodic verifications.	3.4.8	3.1.A.1.d 3.3.A.7

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	CTS establish requirements for a minimum number of RHR pumps that must be in operation and/or Operable in Mode 5 with loops unfilled; however, no surveillance tests are established to verify that these requirements are met. ITS LCO 3.4.8 requires periodic verification that requirements are met.	LCO 3.4.8 SR 3.4.8.1 SR 3.4.8.2	3.3.A.7 3.1.A.1.d
M3	CTS allow an alternate means of decay heat removal to be used in place of one or both RHR loops as long as it can maintain RCS temperature. ITS LCO 3.4.8 does not include an allowance for unlimited use of a temporary decay heat removal system as one of two required decay heat removal systems.	3.4.7 LCO 3.4.8	3.3.A.7.b
ITS SPECIFICATION 3.4.9 - PRESSURIZER			
M1	CTS require 150 kW capacity of pressurizer heaters able to be energized during loss of offsite power. CTS allow 72 hours OOS time. ITS require 2 groups of heaters and that each group have a 150 kW capacity and be able to be powered from an emergency supply. LCO Bases specify that each group be powered from a different safeguards train. LCO 3.4.9. Required Action B.1, allows 72 hours OOS time if one group is not Operable. If neither group is Operable, entry into LCO 3.0.3 is required.	LCO 3.4.9 3.0.3	3.1.A.3.a
M2	CTS say that the pressurizer must be Operable with specified heater capacity when the reactor is above hot shutdown. CTS also say that pressurizer normal water level must be maintained when the reactor is not subcritical by at least 1% Δk . ITS require the pressurizer Operable with the level below specified maximum and with required heater capacity when the plant is in Modes 1, 2, or 3. If requirements are not met, ITS require that the plant be placed outside Applicability.	3.4.9	3.1.A.3 3.1.C.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	CTS require that the pressurizer normal water level must be maintained whenever the reactor is not subcritical by at least 1% Δk ; however, no Actions are specified if this requirement is not met. ITS require that a reactor must be placed in Mode 4 within 12 hours if pressurizer water level cannot be maintained within the specified limit.	LCO 3.4.9	3.1.C.4
M4	CTS require a specified pressurizer heater capacity be available when the reactor is above hot shutdown and that a specified pressurizer water level be maintained when the reactor is not subcritical by at least 1% Δk . However, no surveillance requirements are set. ITS verify pressurizer level every 12 hours and heater capacity every 24 months.	3.4.9 SR 3.4.9.1 SR 3.4.9.2	3.1.A.3 3.1.C.4
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES			
M1	CTS specify that pressurizer code safety valves be Operable above cold shutdown except during RCS hydrostatic tests. ITS keep the requirement but delete the exception.	LCO 3.4.10	3.1.A.2.b
M2	CTS specify that pressurizer code safety valves must be Operable above cold shutdown except during safety valve settings. ITS LCO 3.4.10 maintains the requirement that pressurizer code safety valves must be Operable during normal plant operation but the exception for safety valve settings includes additional clarifications and restrictions.	LCO 3.4.10	3.1.A.2.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)			
M1	CTS require that PORVs and block valves be Operable. However, CTS set Required Actions that assume the sole safety function of the PORVs and associated block valves is vent path isolation if a PORV fails open. Specifically, CTS allow unlimited operation with both PORVs and/or both block valves inoperable as long as the vent path is isolated. ITS keep the operability requirement for PORVs and block valves, but they also ensure that PORVs and block valves provide a single-failure proof means to vent the RCS manually through the pressurizer and to isolate the vent path which may be needed if a PORV is stuck open. Thus, ITS add Conditions and Required Actions when a PORV and/or block valve is inoperable for venting, isolation, or both.	LCO 3.4.11	3.1.A.4 3.1.A.5
M2	CTS require that PORVs and block valves be Operable "whenever the reactor coolant system is above 400°F." ITS LCO 3.4.11 requires that the PORVs and block valves be Operable in Modes 1, 2, and 3.	LCO 3.4.11	3.1.A.4 3.1.A.5
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)			
M1	CTS do not require isolating or depressurizing ECCS accumulators when LTOP is required, nor when RHR is aligned to RCS. However, operating procedures do require that SI accumulators be isolated when RCS pressure is < 1000 psig. ITS require isolating accumulators when LTOP is required operable. Also, accumulator isolation is required only if the accumulator is not depressurized to < maximum RCS pressure.	LCO 3.4.12	3.1.A.8 3.3.A.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	<p>CTS specify that no SI pump be energized and aligned to feed RCS when LTOP is required. CTS have an exception to this requirement, however, and allow 2 HHSI pumps to be aligned to RCS and energized if restrictions on RCS vent size and/or pressurizer level are met. However, CTS do not verify the restrictions on SI pump or alternate restrictions on RCS vent size and/or pressurizer level. In addition, CTS do not require action if these requirements are not met. ITS require verification every 12 hours that no HHSI pumps can inject into RCS. If ITS SR 3.4.12.1 is not met, ITS LCO 3.4.12, Condition A and its RAs apply. ITS LCO 3.4.12, RA A.1, requires immediate action to eliminate capability for HHSI injecting into RCS. Alternately, ITS LCO 3.4.12, RAs A.2 and A.3, keep the allowances in CTS 3.3.A.10 and allow two HHSI pumps to be aligned and energized if restrictions on RCS vent size and/or pressurizer level are met. ITS LCO 3.4.12, RAs A.2 and A.3, differ from CTS 3.3.A.10 in that verification every 12 hours that requirements are met is required.</p>	<p>LCO 3.4.12 Condition A RA A.1</p> <p>LCO 3.4.12 RA A.2</p> <p>LCO 3.4.12 RA A.3</p> <p>SR 3.4.12.1</p>	<p>3.3.A.8</p> <p>3.3.A.10</p> <p>3.0</p>
M3	<p>CTS set RCP starting prerequisites when RCS is < 319°F with OPS inoperable. However, CTS special restrictions on pressurizer level for RCP pump starts with OPS inoperable are not mandatory if RCS has been < 319°F for < 8 hours. ITS keep the prerequisites, but not the relaxation of requirements for additional restrictions on pressurizer level for the first 8 hours that RCS is < 319 °F.</p>	<p>SR 3.4.12.8</p> <p>SR 3.4.12.9</p>	<p>3.1.A.1.h.3</p> <p>3.1.A.1.h.1</p>
M4	<p>CTS specify RCP starting prerequisites that must be met if an RCP is started when RCS temperature ≤ 319 °F. ITS LCO 3.4.12 keep these starting prerequisites as ITS SR 3.4.12.8 and 3.4.12.9. These SRs have added a required Frequency of "Within 15 minutes prior to starting any RCP."</p>	<p>SR 3.4.12.9</p> <p>SR 3.4.12.8</p> <p>LCO 3.4.12</p>	<p>3.1.A.1.h</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	CTS require that pressurizer level be restricted within 8 hours if requirements for OPS and/or RCS venting are not met. Under the same conditions, ITS keep this requirement. However, ITS require re-verification every 12 hours that these restrictions are being met.	LCO 3.4.12	3.1.A.8.c.3
M6	CTS have the option to use an RCS vent with an equivalent opening of at least 2 square inches to provide LTOP when the RCS temperature is at or < 319°F; however, CTS do not require verification that requirements are met if this option is used. ITS keep the option of using an RCS vent to provide LTOP and add a periodic verification.	LCO 3.4.12.b SR 3.4.12.3	3.1.A.8
M7	CTS allow using the Overpressure Protection System (OPS) to provide LTOP when RCS temperature is \leq 319 °F if the OPS is "armed" and operable. CTS do not require verification that the OPS is "armed" if this option is used. CTS use the term "armed" to mean that the motor operated block valve associated with each PORV is in the open position. The OPS is "armed" if the block valve is either opened automatically by the OPS or opened manually by control room operators. SR 3.4.12.5 is added to verify every 72 hours that the block valve is open for each required PORV. This is part of the verification that the OPS is operable. This change does not introduce any unanalyzed operation while requiring periodic surveillances to identify unmet requirements. Thus, this change has no adverse safety effect.	3.4.12 SR 3.4.12.5	3.1.8.1.a.1 3.1.A.8.a
ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE			
	NONE		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE			
M1	<p>CTS require leak testing RCS pressure isolation valves (PIVs), but no actions are specified for failure to meet requirements. ITS address one or more flow paths with leakage from one or more PIVs not within limits. They require isolating the high pressure portion of an affected system from the low pressure portion by using one closed manual, deactivated automatic, or check valve that meets required leakage limits within 4 hours and isolated with a second valve within 72. If these Required Actions and Completion Times are not met, then ITS require the plant be placed in Mode 3 within 6 hours and Mode 5 within 36. The associated Bases clarify that if use of a closed manual, deactivated automatic, or check valve to isolate a leaking PIV renders a required system or component inoperable, then the RAs associated with the affected system or component are initiated when the valve is closed.</p>	3.4.14	4.5.B.2.c 4.5.B.2.d
M2	<p>CTS have testing requirements for residual heat removal (RHR) autoclosure interlocks (ACI) and open permissive interlocks (OPI), but no LCO or RAs if ACI or OPI are inoperable. ITS say that RHR ACI and OPI must be operable in Modes 1, 2, 3, and 4. In addition, RAs address inoperability of the RHR ACIs and OPIs. ITS 3.4.14, Actions Note 2, clarifies that separate entry into Condition C is allowed for ACI and OPI on each RHR suction isolation valve. RA C.1 is modified by a Note allowing RHR suction isolation valves that are closed in accordance with RA C.1 to be opened for 7 days following entry into Mode 4 from Mode 3. This is needed so that RHR is available for cooldown. This does not introduce any unanalyzed operation while requiring a more conservative response than currently required when the RHR OPI or ACI functions are inoperable. Thus, this change has no significant adverse safety effect.</p>	3.4.14 RA C.1 3.4.14 RA C.2 3.4.14 Actions Note 2	Table 4.1-3 Item 13

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	CTS require that the automatic isolation and interlock function for RHR valves 730 and 731 be verified every 24 months; however, acceptance criteria for the function are not specified. ITS keep the requirement, but include acceptance criteria.	SR 3.4.14.3 SR 3.4.14.2	Table 4.1-3
M4	CTS require that PIVs be checked periodically for gross leakage, but no acceptance criteria for leakage is included in the CTS. ITS keeps the requirement that PIVs be checked periodically for gross leakage, and also includes acceptance criteria.	SR 3.4.14.1	4.5.B.2.c 4.5.B.2.d
M5	CTS require that PIVs be checked for gross leakage every 24 months. Also, CTS require that PIVs in the injection flow path be checked for leakage when the reactor is shut down and depressurized to < 700 psig. ITS require that PIVs be checked for gross leakage every 24 months; and when the plant has been in Mode 5 for 7 days or more, and only if testing has not been done in the previous 12 months.	SR 3.4.14.1	4.5.B.2.c 4.5.B.2.d
M6	CTS require that PIVs be checked periodically for gross leakage. ITS also have this requirement, but include a new requirement that this testing must be done within 24 hours following any valve actuation due to automatic or manual action or after any flow through the valve. PIVs disturbed in the performance of this Surveillance must also be tested.	SR 3.4.14.1	4.5.B.2.c 4.5.B.2.d

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION			
M1	This change increases the required number of RCS leak detection systems from 2 to 3 with a specific requirement for the containment sump discharge flow monitor. In addition, this change does not allow containment humidity detectors to be used to satisfy LCO requirements.	LCO 3.4.15	3.1.F.10
M2	CTS require that the RCS leakage detection instrumentation be Operable whenever the reactor is critical and > 2% power. ITS LCO 3.4.15 requires that the RCS leakage detection instrumentation be Operable in Modes 1, 2, 3, and 4.	LCO 3.4.15	3.1.F.10
M3	CTS require operation of 2 RCS leak detection systems of different principles and that one of them be radiosensitive; however, CTS have Required Actions only for the inoperability of the radiosensitive system. ITS require Operability of 3 RCS leak detection systems, and that one of them be the containment sump discharge flow monitor. Also, Required Actions are added to address the inoperability of the required monitor.	3.4.15 SR 3.4.13.1	3.1.F.10
M4	CTS require operation of 2 RCS leak detection systems of different principles and that one of them be radiosensitive; however, CTS have Required Actions only for the inoperability of the radiosensitive system. ITS require Operability of 3 RCS leak detection systems, and one of them must be a FCU condensate measuring system. Also, RAs are added to address the inoperability of the required measuring system.	LCO 3.4.15	SR 3.4.13.1 3.1.F.10

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	CTS requires operation of 2 RCS leak detection systems of different principles and that one of them be radiosensitive; however, CTS have Required Actions for the inoperability of the radiosensitive system only. ITS address the concurrent inoperability of the containment atmosphere radioactivity monitor and the containment FCU condensate measuring system. In this case, one system must be restored within 30 days.	LCO 3.4.15	3.1.F.10
M6	CTS require 2 RCS leak detection systems including the containment FCU condensate measurement system. However, CTS does not require periodic Channel Calibration of the containment FCU condensate measuring system. ITS require Channel Calibration of the containment FCU condensate measuring system and the containment flow monitoring system every 24 months.	LCO 3.4.15	3.1.F.10
M7	When RAs or Completion Times for compensatory actions or restoration for inoperable RCS leakage detection systems cannot be met, the plant must be brought to Mode 3 within 6 hours and Mode 5 within 36. When all required RCS leakage detection systems are inoperable, immediate plant shutdown is required.	LCO 3.4.15 LCO 3.0.3	
M8	CTS require a daily Channel Check of the containment process radiation monitors. ITS SR 3.4.15.1 maintains this requirement for a Channel Check of these instruments; however, the Frequency is increased to every 12 hours.	SR 3.4.15.1	Table 4.1-1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY			
M1	CTS establish a surveillance Frequency for Isotopic Analysis for I-131, 133, and 135 as once per 14 days with a "maximum time between analyses" of 20 days. ITS also require verification of reactor coolant dose equivalent I-131 specific activity every 14 days, but the limit for the maximum time between analyses is based on ITS SR 3.0.2 which allows a 25% grace period.	SR 3.0.2	Table 4.1-2
M2	CTS specify that acceptance criteria for reactor coolant gross activity, a function of E(bar), is limited to "noble gases with half-lives greater than 10 minutes." This is consistent with CTS 1.14 which limits E(bar) to the noble gas E(bar). ITS are based on the ITS Definition, E(bar)-Average Disintegration Energy. The ITS and CTS definitions of E(bar) differ in that ITS include all reactor coolant isotopes, except iodines, with half lives > 10 minutes, making up at least 95% of the total non-iodine coolant activity. This change is needed because the ITS definition requires counting contributions from isotopes other than noble gases.	LCO 3.4.16 3.4.16.1	1.14
M3	CTS require verification at least 5 days per week of "gross activity" and require verification every month of gross specific activity using a "Radiochemical (gamma) Spectral Check." The Radiochemical Spectral Check is equivalent to the gross specific activity defined in the ITS Bases. ITS require verification every 7 days of the gross specific activity. This change requires more Frequent verification of the gross specific activity and eliminates the explicit requirement to verify gross activity at least 5 days per week.	SR 3.4.16.1	3.1.A.1.h.3

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.1 - ACCUMULATORS			
M1	CTS require accumulator isolation valves 894A, 894B, 894C, and 894D open and their power supplies de-energized when RCS pressure is above 1000 psig. ITS require verification that each accumulator isolation valve is fully open every 12 hours and that power is removed from each isolation valve every 31 days.	SR 3.5.1.1 SR 3.5.1.5	3.3.A.3.c
M2	CTS specify that the Frequency for verifying accumulator boron concentration is 31 days and that the maximum time between verifications should never exceed 45 days. ITS keep the requirement, but limit any extension to the 31 day SR interval to 25%.	SR 3.5.1.4	Table 4.1-2
M3	CTS set Actions required if ECCS systems are not restored to meet requirements within specified times when above 350 °F. If the reactor is critical when requirements are not met, then it must be in hot shutdown within 4 hours and cold shutdown within the following 24. If the reactor is subcritical, CTS requires only that RCS temperature and pressure not be increased more than 25 °F and 100 psi over existing values with the requirement to proceed to cold shutdown deferred by 48 hours. Under the same conditions, ITS require the reactor be in Mode 3 in 6 hours and RCS pressure be reduced to < 1000 psig within 12 hours regardless of plant status. The allowance provided in CTS is deleted.	LCO 3.5.1, CONDITION C	3.3.A.5.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	<p>CTS set the Actions required if ECCS systems are not restored to meet requirements within specified completion times when above 350 °F. CTS say that, if the reactor is critical when requirements are not met, then it must be in hot shutdown within 4 hours and cold shutdown within the following 24. Under the same conditions, ITS require the reactor to be in Mode 3 in 6 hours and RCS pressure reduced to < 1000 psig within 12 hours.</p>	<p>LCO 3.5.1, CONDITION C</p>	<p>3.3.A.5.a</p>
M5	<p>CTS specify that the Frequency to verify accumulator boron concentration is 31 days. ITS keep this requirement, but they also require verifying boron concentration within 6 hours in any accumulator that experiences a level increase > 10% of indicated level not the result of addition from the RWST.</p>	<p>SR 3.5.1.4</p>	<p>Table 4.1-2</p>
M6	<p>CTS allow ECCS accumulators to be isolated during RCS hydrostatic tests. This allowance permits the plant to do RCS hydrostatic testing above 350 °F with all accumulators isolated. ITS keep the allowance that permits the plant to perform RCS hydrostatic testing above 350 °F with all accumulators isolated; but limit the duration of this allowance to 8 hours.</p>	<p>LCO 3.5.1, NOTE 1</p>	<p>3.3.A.4.a Figure 4.3-1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING			
M1	This change establishes new SR requirements for the periodic verification that each valve in the ECCS flow path is in the correct position.	SR 3.5.2.1 SR 3.5.2.2	3.3 4.5.A 3.3.A.3 3.3.A.5 3.3.A.5.a 3.3.A.5.b
M2	ITS SR 3.5.2.7 is added to require verification every 24 months that containment sump and recirculation sump suction inlets are unrestricted and otherwise in proper operating condition.	SR 3.5.2.7	3.3 4.5.A
M3	CTS specify that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown within 4 hours and cold shutdown within the following 24. Under the same conditions, ITS require the reactor to be in Mode 3 in 6 hours and in Mode 4 within 12.	3.5.2 Condition B	3.3.A.5 3.3.A.5.a
M4	This change deletes the allowance to defer proceeding to cold shutdown provided in CTS 3.3.A.5.b.	3.5.2	3.3.A.5 3.3.A.5.a 3.3.A.5.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN			
M1	ITS SR 3.5.3.1 is added to require verification every 24 months that containment sump suction inlets are unrestricted and otherwise in proper operating condition.	SR 3.5.3.1 SR 3.5.2.7	3.3 4.5.A
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)			
M1	ITS add a SR to require verification every 24 hours that minimum and maximum RWST water temperature are met..	3.5.4 Condition A SR 3.5.4.1	3.3 4.1
M2	The allowance provided in CTS 3.3.A.5.b is deleted.	3.5.4	3.3.A.5 3.3.A.5.b 3.3.A.5.a
M3	ITS SR 3.5.4.3 maintains the current requirement to verify RWST boron concentration every 31 days; however, ITS SR 3.0.2 limits any extension to the 31 day SR interval to 25%.	SR 3.5.4.3 SR 3.0.2	Table 4.1-2
M4	ITS SR 3.5.4.2 maintains the CTS acceptance criteria that RWST level is greater than 35.4 feet and includes the new requirement to verify every 7 days that RWST level is within required limits.	SR 3.5.4.2	3.3.A.3 3.3.A.1.a 3.3.A.3.a

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.6 - CONTAINMENT SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.1 - CONTAINMENT			
	NONE		
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS			
M1	CTS specifies that if an air lock is not Operable, then containment integrity must be restored within one hour. Under the same conditions, ITS keeps this requirement, but also requires that the Operable door in the affected air lock must be locked shut within 24 hours and verified locked closed every 31 days thereafter.	3.6.2 RA A RA B	3.6.A.3
M2	ITS requires compensatory actions for an airlock with an inoperable interlock equivalent to the compensatory actions for an inoperable airlock door. ITS allow entry into and exit from containment through an airlock with an inoperable interlock only under the control of a dedicated individual stationed at the air lock.	3.6.2 RA B	1.10 1.10.3 3.6.A
M3	CTS 3.6.A and 1.10 do not have requirements for the Operability or testing of the door interlock on containment airlocks. ITS SR 3.6.2.2 is added to require verification of the Operability of each air lock interlock every 24 months.	SR 3.6.2.2	1.10 3.6.A

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES			
M1	CTS requires containment integrity be restored within one hour. Integrity is restored if at least one manual valve or flange isolates the flow path. ITS keeps this requirement, but adds verification that the affected flow path is isolated once per 31 days for devices outside containment. For penetrations with isolation devices inside containment, this verification is required before entering Mode 4 from Mode 5.	3.6.3 RA A RA B RA C	1.10 1.10.4 3.6.A.3 3.6.D
M2	CTS does not limit time or reasons that containment PRIVs may be open. Both CTS and ITS limit the opening angle of the containment pressure relief isolation valves, but ITS adds the restriction that containment pressure relief isolation valves may be opened only as necessary for pressure control, ALARA or air quality considerations, or for Surveillances. ITS requires verification every 31 days.	SR 3.6.3.2 SR 3.6.3.7	3.6.A 4.13
M3	ITS SR 3.6.3.3 and 3.6.3.4 are added to require periodic verification that isolation valves and blind flanges not locked, sealed or otherwise secured are positioned or installed as required.	SR 3.6.3.3 SR 3.6.3.4	1.10.1 3.6.A 4.13
M4	CTS does not require periodic verification that the isolation time of each power operated automatic containment isolation valve is within limits. ITS requires periodic verification that each automatic containment isolation valve is within limits at a frequency in accordance with the Inservice Testing Program.	SR 3.6.3.5	3.6.A 4.13
M5	ITS allows use of a closed automatic valve in lieu of a closed manual valve but only if the closed automatic valve is “deactivated;” the CTS does not.	LCO 3.6.3	1.10.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
M6	ITS SR 3.6.3.8 is added to require one complete cycle of each manually operated containment isolation valve on essential lines every 24 months.	SR 3.6.3.8	None
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE			
M1	ITS maintains the requirement for the limits on containment pressure; however, ITS 3.6.4 expands the Applicability to Modes 1, 2, 3 and 4.	3.6.4 Applicability	3.6.B
M2	CTS specifies that containment internal pressure must be kept between +2.5 psig and -2.0 psig, but, there is no explicit requirement for periodic verification that this requirement is met. ITS verifies every 12 hours that containment pressure is within required limits.	SR 3.6.4.1	3.6.B
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE			
	NONE.		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER SYSTEM			
M1	ITS limits the time that the plant may be without the full complement of containment cooling and iodine removal capability, while the CTS does not limit the time.	LCO 3.6.6	3.3.B.2
M2	Moved to the L-Table.		
M3	ITS SR 3.6.6.1 is added to require verification every 31 days that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position. There is no equivalent requirement in the CTS.	SR 3.6.6.1	None
M4	ITS SR 3.6.6.2 is added to require operation of each required containment fan cooler train for ≥ 15 minutes every 92 days. There is no equivalent requirement in the CTS.	SR 3.6.6.2	None
M5	ITS SR 3.6.6.3 is added to require verification every 92 days that cooling water flow to each FCU is ≥ 1400 gpm. There is no equivalent requirement in the CTS.	SR 3.6.6.3	None
M6	CTS 4.5.A.4.b.3 requires that charcoal filter isolation valves shall be tested to verify operability every 24 months. ITS SR 3.6.6.7 expands this surveillance to require verification that each FCU actuates and dampers re-position on receipt of an actual or simulated safety injection signal.	SR 3.6.6.7	4.5.A.4.b.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM			
M1	ITS SR 3.6.7.1 is added to require verification every 31 days that each spray additive manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position. There is no equivalent requirement in the CTS.	SR 3.6.7.1	None
M2	ITS requires verification every five years of spray additive rate from each solution tank's flow path. There is no equivalent requirement in the CTS.	SR 3.6.7.5	None
M3	Moved to the A-Table.		
M4	ITS SR 3.6.7.2 is added to require verification every 184 days that requirements for the minimum solution volume in the spray additive tank are met.	SR 3.6.7.2	3.3.B.1 3.3.B.1.a

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS			
	None		
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM			
M1	CTS specifies that if the IVSW System is not restored to Operable status within the time specified, then the reactor shall be brought to hot standby using normal operating procedures. Then, the CTS allows 48 hours to restore IVSW before the reactor must be placed in cold shutdown. ITS keeps the requirement to be in hot shutdown using normal operating procedures, but also requires that the plant be in Mode 5 in 36 hours.	3.6.9 Action C	3.3.C.3.a 3.3.C.3.b 3.3.C.3.c
M2	CTS requires that the IVSW tank be kept at a minimum pressure of 47 psig and contain a minimum of 144 gallons of water, but, no requirement exists to verify periodically that these requirements are met. ITS keeps the requirement to keep these parameters within specified limits, but adds verification every 24 hours.	LCO 3.6.9 SR 3.6.9.1 SR 3.6.9.3	3.3.C.1.b
M3	ITS requires verifying every 24 hours that the IVSW nitrogen supply is properly aligned, verifying that valves actuate within the required time limits at least once every 24 months, and verifying proper operation of each automatic valve in the IVSW System every 24 months. The CTS does not specifically require this.	SR 3.6.9.2 SR 3.6.9.4 SR 3.6.9.5	3.3.C

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS specifies that, if the IVSW System is not restored to Operable status within a specified completion time, then the reactor shall be brought to hot shutdown using normal operating procedures and that the shutdown shall start no later than the end of the specified period. Under the same conditions, ITS requires the plant be in Mode 3 in 6 hours.	1.3 3.6.9 Action C	3.3.C.3.a
ITS SPECIFICATION 3.6.10 - WCCPP SYSTEM			
M1	ITS keeps the requirement to keep WC&PPS Operable but a verification is added every 31 days that this requirement is met.	LCO 3.6.10 SR 3.6.10.1	3.3.D.1.a
M2	CTS requires that the uncorrected air consumption for the WC&PPS is $\leq 0.2\%$ of the containment volume per day, but there is no requirement for periodic verification. ITS keeps the requirement to keep WC&PPS Operable, but they also requires verification every 31 days.	SR 3.6.10.2	3.3.D.1.b
M3	CTS specifies that an inoperable WC&PPS zone must be restored within 7 days; otherwise, the reactor must be placed in cold shutdown. Under the same conditions, ITS requires that depressurized portions of WC&PPS be isolated within 4 hours with periodic verification.	3.6.10 Action A	3.3.D.2.a
M4	CTS specifies that WC&PPS excess leakage must be restored within 7 days. Otherwise, the reactor must be placed in cold shutdown. ITS keeps this requirement, but, restoring leakage to within specified limits may not restore the required safety function. Therefore, a Note was added to RA B.3 and RAs B.1 and B.2 were added.	3.6.10 Action B	3.3.D.2.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	<p>CTS require that the reactor be put in Mode 3 if WC&PPS cannot be restored to Operable status. CTS allows the reactor to stay in hot shutdown 48 hours before starting cooldown if RCS temperature and pressure do not increase more than 25°F and 100 psi. ITS keeps the requirement to put the reactor in Mode 3. Required Action C.2, requires the reactor be put outside applicable Mode. The CTS 3.3.D.3.b requirement to maintain stable temperature and pressure is eliminated.</p>	3.6.10 Action C	3.3.D.3.a 3.3.D.3.b 3.3.D.3.c
M6	<p>CTS specifies that, if the WC&PPS is not restored to Operable status within a specified completion time, then the reactor shall be brought to hot shutdown and then cold shutdown using normal operating procedures. Under the same conditions, ITS specify that the reactor be in Mode 3 in 6 hours and Mode 5 in 36 hours.</p>	3.6.10 Action C	3.3.D.3
M7	<p>CTS requires that the “uncorrected” air consumption for the WC&PPS be $\leq 0.2\%$ of the containment volume per day. ITS SR 3.6.10.2 maintains this requirement except that the term “uncorrected” is deleted.</p>	SR 3.6.10.2	3.3.D.1.b

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.7 PLANT SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)			
M1	CTS establishes a requirement for a minimum of 20 main steam valves. ITS maintains this but also specifies specific requirements for each of the valves.	3.7.1	3.4.A
M2	CTS have an allowance indicating that the requirement for a minimum of 20 main steam valves does not apply during testing. This is interpreted as allowing entry into Mode 3 prior to a verification of the lift setpoints which must be done with the valve at normal operating temperature and pressure. ITS provide the same relaxation by a Note that requires the surveillance be performed in Modes 1 and 2 only. This means that the SR 3.7.1.1 must be completed only prior to entering Mode 2.	3.7.1	3.4.A
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)			
M1	CTS allow all 4 MSIVs to be inoperable for 48 hours prior to requiring initiation of plant shutdown. ITS allow only one MSIV to be inoperable for up to 48 hours prior to requiring shutdown initiation.	3.7.2	3.4.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	CTS require that the MSIVs be tested to verify closure time is within specified acceptance criteria with the unstated assumption that this verification must be performed and met whenever MSIV Operability is required. ITS maintains this requirement except that a Note provides that the SR must be performed only prior to entering Mode 2.	3.7.2	4.7
M.3	CTS does not include explicit requirements for the operability or testing of the MSCVs; however, MSCVs are currently tested in accordance with the requirements of the IST Program. ITS adds an explicit requirement for the Operability of the MSCVs and adds an explicit requirement for testing of the MSCVs in accordance with the IST Program.	3.4 4.7	3.7.2
ITS SECTION 3.7.3 - MAIN BOILER FEEDPUMP DISCHARGE VALVES (MBFPDVS), MAIN FEEDWATER REGULATION VALVES (MBFRVS) AND MBFRV LOW FLOW BYPASS VALVES			
M1	CTS establish the requirement for instrumentation that isolates the feedwater lines upon actuation of the Safety Injection System in order to prevent excessive cooldown of the reactor coolant system. CTS does not provide any specific requirements for the Operability or testing of the actuated devices for this function. ITS adds a requirement for Operability of the MBFPDVs, MBFRVs and MBFRV Low Flow Bypass valves which includes testing of the actuated devices for this function.	3.7.3	Table 3.5-4
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADVs)			
M1	CTS does not establish any requirements for the operability of the ADVs. ITS adds a requirement for Operability of the ADV lines associated with any 3 of the 4 steam generators in Modes 1, 2, and 3, and in Mode 4, when a steam generator is being relied upon for heat removal.	3.7.4	NONE

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM			
M1	<p>CTS requires 3 Operable Auxiliary Feedwater (AFW) pumps and establishes the Applicability as whenever the reactor is heated above 350°F (i.e., Modes 1,2, and 3). ITS maintains the requirement for 3 Operable AFW trains with an Applicability of Modes 1, 2, and 3: however, ITS establishes a new requirement that one of the motor-driven AFW pumps must be Operable in Mode 4 when a steam generator is relied upon for heat removal. Additionally, a Note specifies that the motor-driven AFW pump required to be Operable in Mode 4 must be capable of supporting the SG(s) being credited as the redundant decay heat removal path.</p>	3.7.5	3.4.A 3.4.A.2
M2	<p>ITS adds a supplementary Completion Time governing one inoperable AFW pump in Mode 1, 2, or 3 from discovery of failure to meet the LCO. This new Completion Time establishes a limit on the maximum time allowed for an AFW pump to be inoperable from any combination of Conditions during any continuous failure to meet this LCO.</p>	3.7.5	None
M3	<p>CTS require that the plant be in hot shutdown within the next 12 hours if an inoperable AFW pump cannot be restored within 72 hours and requires that the plant be in hot shutdown within 12 hours if two AFW pumps are inoperable. Under the same conditions, ITS requires the plant be in Mode 3 in 6 hours and Mode 4 in 18 hours.</p>	3.7.5	3.4.C.2 3.4.C.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS do not specifically require periodic verification that valves capable of being mispositioned are in the correct position. ITS establish a requirement for monthly verification of the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths in order to provide assurance that the proper flow paths will exist for AFW operation. This SR is modified by a Note that specifies that these valve lineups are not applicable in Mode 4 even when steam generator is relied upon for heat removal.	3.7.5 SR 3.7.5.1	4.8
M5	CTS require verification every 24 months that the recirculation valve will actuate to its correct position. ITS maintains this requirement but expands the scope to include each AFW automatic valve that is not locked, sealed, or otherwise secured in position.	3.7.5 SR 3.7.5.3	4.8.3.a
ITS SECTION 3.7.6 - Condensate Storage Tank (CST)			
M1	CTS require that the CST be operable as the primary water supply for the AFW. City Water is the backup source of water to AFW system. CTS establishes the Applicability for CST Operability as whenever the reactor is heated above 350°F (i.e., Modes 1, 2 and 3). ITS maintains this but expands the Applicability to include Mode 4 when a steam generator is relied upon for heat removal.	3.7.6	3.4.A 3.4.A.2
M2	CTS require that the CST and City Water (CW) be operable in Modes 1, 2 and 3. When either the CST or CW or both are not operable, CTS allows 48 hours to restore both water supplies to operable before a plant shutdown is required. Under the same conditions, ITS will not allow both the CST and CW to be inoperable at the same time.	3.7.6 3.7.7	3.4.A.3 3.4.A.7 3.4.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	CTS do not have any requirements for the verification of the Operability of the CST other than an implied requirement to periodically verify the CST volume. ITS adds a requirement for verification every 12 hours that the CST contains a reserve of condensate for the auxiliary feedwater pumps sufficient to hold the plant at hot shutdown for 24 hours following a trip at full power.	SR 3.7.6.1	3.4 3.4.A.3 4.8
ITS Section 3.7.7 -- City Water			
M1	CTS require CW to be operable as a backup water supply for the Auxiliary Feedwater System. The CST is the primary source of water to AFW. CTS establishes the Applicability for CW Operability as whenever the reactor is heated above 350°F. ITS LCO 3.7.7 maintains this requirement for Operability; however, ITS expands the Applicability to include Mode 4 when a SG is relied upon for heat removal.	3.7.5 3.7.7	3.4.A 3.4.A.7 3.4.B
M2	CTS require that the CST and CW are Operable in Modes 1, 2 and 3. ITS prevents and enforces this prohibition of simultaneous inoperability of both CST and CW by requiring verification of the Operability of the alternate source immediately and once per 12 hours thereafter if either the CST or CW are not operable.	3.7.6 3.7.7	3.4.A.3 3.4.A.7
M3	CTS do not establish any requirements for the verification of the operability of CW other than testing the valves in the supply lines between CW and the AFW pump suction every 24 months. ITS adds a requirement to verify that the CW header pressure is ≥ 30 psig every 12 hours.	SR 3.7.7.1	4.8

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS do not establish any requirements for the verification of the operability of CW other than testing the valves in the supply lines between city water and the AFW pump suction every 24 months. ITS adds a requirement to verify that the valve that isolates Unit 3 from the site city water supply and the city water storage tank is open.	3.7.7.2	4.8
ITS SPECIFICATION 3.7.8 - COMPONENT COOLING WATER (CCW) SYSTEM			
M1	CTS specify that if requirements for CCW are not met when the reactor is critical and CCW is not restored to Operable within the specified restoration time, then a shutdown to the cold shutdown condition must be initiated immediately. However, CTS also specifies that if requirements for CCW are not met when the reactor is subcritical and CCW is not restored to Operable within the specified restoration time, then plant shutdown to Mode 5 may be delayed an additional 48 hours. Under the same conditions, ITS requires an immediate plant shutdown to Mode 5 regardless of the status of the reactor when the inoperability with CCW is identified.	3.7.8	3.3.E.3.a 3.3.E.3.b
M2	CTS include requirements for CCW Operability; however, there are no explicit requirements for periodic verification of the key aspects to CCW Operability. ITS adds a requirement for valve lineups every 92 days; to verify proper automatic operation of the CCW valves every 24 months; and to verify automatic operation of the CCW pumps every 24 months.	3.7.8	3.3.E

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.9 - SERVICE WATER (SW) SYSTEM			
M1	If one or more pumps on either or both headers are inoperable, CTS allow 12 hours for restoration. ITS revises the CTS to differentiate between a loss of function and a loss of redundancy on the essential and/or nonessential service water headers when a SW pump is inoperable. If there is a loss of minimum required essential and/or nonessential SW function, ITS requires that the plant is promptly placed in a Mode in which the LCO does not apply.	3.7.9 Actions	3.3.F.1 3.3.F.2
M2	CTS require that the required number of essential SW pumps are operable “together with their associated piping and valves.” CTS allows 12 hours for restoration of inoperable SW piping and valves. ITS revises CTS to differentiate between a loss of function and a loss of redundancy on the essential service water header. If there is a loss of minimum required essential SW function, ITS requires that the plant is promptly placed in a Mode in which the LCO does not apply.	3.7.9 Actions	3.3.F.1 3.3.F.2
M3	CTS do not require periodic verification that valves able to be mispositioned are in the correct position. ITS SR 3.7.9.1 sets a requirement for verification of the correct alignment for manual, power operated, and automatic valves in the SWS System flow paths every 92 days to provide assurance that the proper flow paths will exist for SWS operation.	SR 3.7.9.1	3.3 4.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	CTS do not specifically require periodic verification that SWS valves will actuate to the correct position when required. ITS require verification every 24 months that each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	SR 3.7.9.2	3.3 4.1
M5	CTS do not specifically require periodic verification each SWS pump will start automatically when required although CTS requires a manual pump start at least once per quarter. ITS establishes a requirement to verify every 24 months that each SWS pump starts automatically on an actual or simulated actuation signal.	SR 3.7.9.3	3.3 4.1 TABLE 4.1-3

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.10 - ULTIMATE HEAT SINK (UHS)			
M1	CTS require UHS temperature be < 95 °F, but do not verify this except for monitoring UHS temperature every hour when the UHS temperature is > 90 °F. ITS verify every 24 hours that average UHS temperature is ≤ 95 °F.	3.7.10	3.3.F.1.b 3.3.F.8
ITS SPECIFICATION 3.7.11 - CONTROL ROOM VENTILATION SYSTEM (CRVS)			
M1	CTS require that CRVS be operable but do not require redundant CRVS capability. Likewise, CTS have requirements when the CRVS is inoperable, but do not distinguish between loss of CRVS redundancy and loss of CRVS function. Thus, CTS have no RAs for loss of CRVS redundancy and have an AOT of 72 hours for loss of CRVS function. ITS require two operable CRVS trains for redundancy and establish a new AOT of 7 days when one of the two redundant trains is not operable.	3.7.11	3.3.H.1 3.3.H.2
M2	CTS say that if CRVS requirements cannot be met within AOT, then the reactor shall be put in hot shutdown using normal operating procedures. If, after 48 hours more, the condition still exists, the reactor shall be put in cold shutdown using normal operating procedures. ITS require that the plant be put in a Mode in which the LCO does not apply if requirements cannot be met, but it must be in Mode 3 within 6 hours.	3.7.11	3.3.H.2
M.3	CTS do not require periodic verification that control room (CR) boundary integrity will permit a single CRVS train to maintain the CR at a slight positive pressure throughout an accident. ITS require verification every 24 months that one CRVS train can maintain a slight positive pressure when the CRVS is in the incident mode.	SR 3.7.11.4	3.3.H 4.5.A.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.12 - CONTROL ROOM AIR CONDITIONING SYSTEM (CRACS)			
M1	<p>CTS does not include any requirement for the Operability of the CRACS. ITS adds a requirement that two 100% capacity control room air-conditioning systems are operable in Modes 1, 2, 3, and 4 and establishes allowable out of service times for a loss of CRACS redundancy and a loss of CRACS function.</p>	3.7.12	NONE
M2	<p>CTS do not include any requirements for the testing of the CRACS. ITS add a requirement to verify every 24 months that each CRACS can remove the heat load assumed in the safety analysis.</p>	SR 3.7.12.1	NONE
ITS SPECIFICATION 3.7.13 - FSB EMERGENCY VENTILATION SYSTEM (FSBEVS)			
M1	<p>CTS require the operability of the FSBEVS; however, there is no CTS requirement for the periodic verification that the Fuel Service Building boundary and the FSBEVS meet the requirements specified in the Final Safety Analysis Report (FSAR). ITS adds a requirement to verify every 24 months that the FSB boundary and FSBEVS meet the requirements specified in the FSAR.</p>	SR 3.7.13.5	<p>3.8.A.12</p> <p>3.8.C.6</p>
M2	<p>CTS require that the filtration bypass assembly must be isolated and leak tested to ensure that it is properly sealed prior to handling of irradiated fuel. ITS keeps this requirement, and includes a requirement for periodic verification that FSBEVS operability is met.</p>	SR 3.7.13.1	4.5.A.6.b

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.7.14 - SPENT FUEL PIT WATER LEVEL			
M1	CTS specify that the minimum water level in the fuel storage pit must be maintained \geq 23 feet over the top of irradiated fuel assemblies seated in the storage rack whenever irradiated fuel in the spent fuel pit is being moved; however, there is no explicit requirement for periodic verification that this requirement is met. ITS maintains this requirement and adds a requirement for periodic verification that the fuel pool water level requirements are met.	SR 3.7.14.1	3.8.C.4
ITS SPECIFICATION 3.7.15 - SPENT FUEL PIT BORON CONCENTRATION			
	NONE		
ITS SPECIFICATION 3.7.16 - SPENT FUEL ASSEMBLY STORAGE			
	NONE		
ITS SPECIFICATION 3.7.17 - SECONDARY SPECIFIC ACTIVITY			
M1	CTS requires that secondary system specific activity must be within the required limit whenever the average reactor coolant temperature is \geq 350°F. ITS requires that secondary system specific activity must be within the required limit in Modes 1, 2, 3 and 4. In conjunction with the change in applicability, ITS requires that the unit be placed in and Mode 5 if the specific activity is not within the limit.	3.7.17	3.1.G.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	<p>CTS requires verification that secondary system specific activity is within specified limits every month with a maximum time between secondary coolant specific activity analyses of 45 days. ITS maintains this requirement but limits the maximum time between analyses based on a 25% grace period.</p>	3.7.17	Table 4.1-2

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING			
<p>M1</p>	<p>CTS 3.7 and 4.6 have no verification of correct breaker alignment and indicated power availability for offsite circuits. ITS add verification every seven days that each breaker in the offsite circuit is in its correct position. This ensures that distribution buses and loads are connected to their normal power source and that appropriate independence of offsite circuits is maintained. Seven days is adequate since breaker position is unlikely to change without the operator being aware and since breaker status is displayed in the CR, but when an offsite circuit or DG is inoperable, it is very important that breaker alignment be consistent with analysis assumptions. Thus, in this condition, ITS accelerate frequency to within one hour of discovery and once every eight hours thereafter. This is acceptable since it introduces no unanalyzed operation while requiring verification that assumptions regarding availability and independence of offsite sources are satisfied. Thus, this change has no significant adverse safety effect.</p>	<p>SR 3.8.1.1 LCO 3.8.1 RA A.1 LCO 3.8.1 RA B.1</p>	<p>3.7 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	<p>Above cold shutdown, CTS require four energized 480V buses. ITS do, too, but have no RAs for a system made inoperable by an inoperable support system. Therefore, NUREG-1431, LCO 3.8.1, RAs D.1 and D.2, are modified, so when Condition D is entered with no AC power source to any train, LCO 3.8.9 Conditions and RAs are entered. This allows Condition D to have requirements for loss of one offsite circuit and one DG, regardless of whether a train is de-energized. LCO 3.8.9 has restrictions for a de-energized train. ITS differ from NUREG-1431 in that when Condition D is entered with no offsite or DG AC power source to any train, Conditions and RAs for LCO 3.8.9 are entered. Further, distribution system configuration is such that buses 2A and 3A are not connected automatically to an offsite source if the 13.8 kV offsite source is supplying 6.9 kV buses 5 and 6. This is acceptable since it introduces no unanalyzed operation while verifying that assumptions on offsite sources are satisfied. This has no significant adverse safety effect.</p>	<p>LCO 3.8.9 Conditions RAs</p> <p>LCO 3.0.6</p> <p>LCO 3.8.1 RAs D.1 and D.2 Note</p>	3.7.A.4
M3	<p>CTS require that each month each DG must be manually started and synchronized to its bus or buses and allowed to assume the normal bus load and run for a period of time sufficient to reach stable operating temperatures. ITS keep this requirement, but, set more restrictive acceptance criteria for DG starting and loading and the length of the test. The acceptance criteria ensure that monthly DG start tests verify that the DG achieves suitable voltage and frequency. In addition, ITS require that the DG start test is followed immediately by one hour of operation at 90% to 100% of the continuous rating of the DG versus the CTS requirement to assume the normal bus load. The ITS acceptance criteria ensure that the DG can function within design limits. These changes are acceptable because they do not introduce any unanalyzed operation while requiring periodic verification of DG starting times and ability to accept rated load using acceptance criteria consistent with analysis assumptions. Thus, this change has no significant adverse safety effect.</p>	<p>SR 3.8.1.2</p> <p>SR 3.8.1.3</p>	4.6.A.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M4	<p>CTS do not include any requirement for periodically checking for and removing accumulated water from each day tank. ITS SR 3.8.1.5 adds a new requirement to check for and remove accumulated water from each day tank once every 31 days. This change is needed to reduce the potential for fuel oil degradation due to microbiological fouling and to eliminate the potential for water entrainment in the fuel oil during DG operation. This change is acceptable because it is consistent with the recommendations of Regulatory Guide 1.137 and does not create any condition that could interfere with DG operability or operation. Therefore, this change has no significant adverse effect on safety.</p>	SR 3.8.1.5	4.6
M5	<p>CTS do not include any requirement for verification of the proper operation of the automatic makeup of fuel oil from the storage tank to the DG day tank. ITS add a new requirement to verify that the fuel oil transfer system operates to transfer fuel oil automatically from the storage tank to each DG day tank. This demonstrates that the transfer system will support continuous operation of the DG by ensuring each of the following: the fuel oil transfer pump is operable; the fuel oil piping system is intact; the fuel delivery piping is not obstructed; and, the controls for automatic fuel transfer are operable. This change is acceptable because it does not create any condition that could interfere with DG operability or operation. Therefore, this change has no significant adverse effect on safety.</p>	SR 3.8.1.6	4.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
M6	<p>CTS do not require verifying transferability between the 138 and the 13.8 kV offsite sources. CTS also do not require verifying that 6.9 kV buses 1 through 4 will autotransfer back to 6.9 kV buses 5 and 6 if the main generator trips. ITS add a requirement to verify every 24 months that offsite power can be transferred manually from the 138 to the 13.8 kV offsite source. ITS also require verifying every 24 months that 6.9 kV buses 1 through 4 will autotransfer to 6.9 kV buses 5 and 6 following loss of voltage on 6.9 kV buses 1 through 4. This confirms operability of a function assumed to operate on loss of offsite power. This SR is modified by stipulating that it must be met only when the 138 kV offsite source is supplying 6.9 kV buses 5 and 6. This is needed and acceptable since the feature tested by this SR must be disabled when the 13.8 kV source is supplying 6.9 kV buses 5 and 6. This SR may be done during normal shutdown or credit may be taken for unplanned events that satisfy it. This is acceptable since it does not create a condition that could interfere with operability or operation of offsite sources. This change has no significant adverse safety effect.</p>	<p>SR 3.8.1.7 SR 3.8.1.8</p>	4.6
M7	<p>CTS do not include any requirements to verify a DG's automatic trips are bypassed during an emergency DG start. ITS SR 3.8.1.9 is added to verify that a loss of voltage signal on the emergency bus concurrent with an ESF actuation signal causes each DG's automatic trips to be bypassed except for those trips identified in the FSAR as not being bypassed. The trips not bypassed are engine overspeed, low lube oil pressure, and the start failure relay. This test is needed to verify that non-critical trips will not prevent the DG from responding as required. This SR is acceptable because it does not create any condition that could interfere with DG operability or operation. Therefore, this change has no significant adverse effect on safety.</p>	SR 3.8.1.9	4.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
M8	<p>CTS require that every 24 months each DG be started manually, synchronized, loaded to its two-hour rating, and run 105 minutes. ITS keep this requirement, but extend test duration to eight hours. ITS also say that the test be done with DG loaded ≥ 1837 kW and ≤ 1925 kW for ≥ 105 minutes and loaded ≥ 1575 kW and ≤ 1750 kW for the remaining time. This conforms to IEEE 387-1995 and ensures that DG endurance is consistent with accident assumptions. Test duration is sufficient to demonstrate long term operation of lube and fuel oil, ventilation, and cooling water. This change is acceptable since the DG is still demonstrated to maintain a load $>$ the FSAR assumed maximum, and the test duration does not cause significant stress or wear. The change has no significant adverse safety effect. The high load portion of the test will stay at 105 minutes consistent with current licensing basis versus 2 hours in IEEE 387-1995. This is necessary since the DG rating limits operation to $<$ two hours in any 24 when operating in the range required for the high load part of the test.</p>	SR 3.8.1.10	4.6.A.2
M9	<p>CTS require verification every 24 months that the plant can respond to a DBA with concurrent loss of offsite power. This requires verifying required bus load shedding, starting each DG automatically, restoring operation of particular vital equipment using the DG, and verifying that the DG powers the required loads within 60 seconds after initial signal. ITS keep this requirement, but set more restrictive acceptance criteria for DG starting, loading, and test duration. The acceptance criteria ensure that the test verifies that the DG achieves suitable voltage and frequency. In addition, ITS require that the DG operate at the assumed load for at least 5 minutes. This change is needed because the ITS SR 3.8.1.12 acceptance criteria ensure that the DG can function within design limits. This change is acceptable because it does not introduce any operation which is un-analyzed while requiring periodic verification of DG starting times and ability to accept rated load using acceptance criteria consistent with the IP3 analysis assumptions. Therefore, this change has no significant adverse safety effect.</p>	3.8.1.12	4.6.A.3

Discussion of Change	Summary of Change	ITS Section	CTS Section
M10	<p>Above cold shutdown, CTS set RAs if the distribution system is not restored to meet requirements within specified CTs. CTS specify that, if the reactor is critical when requirements are unmet, then it shall be in hot shutdown within 6 hours and cold shutdown within the following 30, but if the reactor is subcritical when requirements are not met, CTS require only that RCS temperature and pressure not increase more than 25 °F and 100 psi over existing values. In these conditions, ITS require that the reactor be in Mode 3 in 6 hours and Mode 5 in 36 regardless of plant status when the Condition is identified. The allowance provided in CTS is deleted. This change eliminates ambiguity created by CTS 3.7.C.2 when performing a reactor shutdown and cooldown required by CTS 3.7.C.1 and ensures that the plant is placed outside LCO Applicability when requirements are unmet. This is acceptable since placing the plant outside the LCO Applicability when requirements are unmet is conservative and there is no change in the CTS 3.7.C.1 requirement. This change has no significant adverse safety effect.</p>	<p>3.8.1 RA F.1</p> <p>3.8.1 RA F.2</p> <p>3.8.1 RA G.1</p> <p>3.8.1 RA H.1</p>	<p>3.7.C</p> <p>3.7.C.1</p> <p>3.7.C.2</p>
M11	<p>CTS 3.7.D states that the requirements of CTS 3.7.A.1 for two offsite circuits when above cold shutdown may be modified during an emergency system-wide blackout condition. CTS 3.7.D stipulates that, under emergency conditions, requirements for offsite power sources may be satisfied with the following: two of the three 13.8 kV feeders (13W92, 13W93 and/or 13W94) to the Buchanan substation 138 kV buses operable with at least 37 mW power from any combination of gas turbines (nameplate rating at 80°F) at the Buchanan substation and onsite available for exclusive use on Indian Point Unit No. 3. This relaxation of requirements for offsite sources during an emergency system-wide blackout condition is not retained in the ITS because 37 MW is insufficient to support a plant startup with four RCPs operating as required by ITS 3.4.4; transient and accident analyses generally have been performed assuming 4 RCS loops in operation.</p>	<p>3.8.1</p>	<p>3.7.D</p> <p>3.7.A.1</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.2 - AC SOURCES SHUTDOWN			
M1	<p>CTS require minimum shutdown AC, but no Actions for unmet requirements. ITS keep the requirements, but, if unmet, then either declare features with less than required AC inoperable; or, suspend core alteration, fuel movement, and positive reactivity operations; and, begin restoring AC. This is acceptable since a. declaring inoperable any required feature unsupported by an operable offsite source and an operable DG ensures proper restrictions; this ensures required features can tolerate single failure of a DG or loss of offsite power; b. suspending core alteration, fuel movement, and positive reactivity operations minimize potential for postulated events; c. making allowances so that suspending prohibited activities does not preclude establishing safe conditions or increasing vessel inventory; d. if prohibited activities are suspended, then begin restoring AC, continuing until restored. This introduces no unanalyzed operations while establishing Actions for unmet requirements. Thus, this has no significant adverse safety effect.</p>	<p>LCO 3.8.2 3.8.2 RAs</p>	<p>3.7.F</p>
M2	<p>CTS include requirements for periodic testing and surveillance of the AC sources, specifically the diesel generators, and these requirements are applicable in all Modes. ITS maintain the same requirement by requiring that all applicable SRs must be met when ITS 3.8.2 is applicable. However, ITS include requirements not included in CTS including: requirements for testing and/or verification of the status of offsite circuits; and, new and/or more restrictive acceptance criteria for existing SRs. All changes to surveillance and testing requirements are described and justified with ITS 3.8.1.</p>	<p>SR 3.8.2. 3.8.1 SRs</p>	<p>4.6.A</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>CTS specify that requirements for AC sources in shutdown include a transmission circuit to Buchanan Substation, "except for testing." ITS have no relaxation of requirements for AC Sources in shutdown to accommodate testing. ITS do specify that if requirements for AC sources are unmet, the plant must either: declare inoperable the affected required feature with no DG available; or, suspend core alterations and fuel movement, and initiate action to suspend positive activity operations. In addition, ITS allow intentionally taking Actions in lieu of meeting an LCO, as needed, to do SRs, preventive or corrective maintenance, or investigation of operational problems. Thus, the combination of RAs for LCO 3.8.2 and the allowance provided by ITS provide an allowance equivalent to CTS to accommodate testing, but, ITS require that requirements must be satisfied before taking this allowance. This is a more restrictive change with no significant adverse safety effect since it requires taking conservative compensatory actions.</p>	<p>LCO 3.8.2 LCO 3.8.2 RAs LCO 3.0.2</p>	3.7.F.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR			
M1	<p>CTS require weekly verification of DG fuel inventory. DG fuel inventory includes day tanks, storage tanks, and offsite reserves. ITS require verifying inventory in offsite reserves, but increase frequency from weekly to every 24 hours. This satisfies FSAR requirements for daily monitoring of offsite reserves. The FSAR specifies daily monitoring of the offsite reserve since the reserve is in tanks supporting gas turbine units not under Licensee control. Although the 30,026 gallons fuel oil needed to support DG operability is designated for the exclusive use of IP3, the fact that the oil in the tanks is used for other purposes and consumption is not under direct IP3 control warrants frequent verification. This change is acceptable since it does not introduce any unanalyzed operation while requiring more conservative verification of I inventory than currently required. In addition, this is consistent with FSAR monitoring requirements. This change has no significant adverse effect on safety. (Also, see L5)</p>	<p>3.8.1 3.8.3 SR 3.8.3.1</p>	<p>Table 4.1-3 Item 8</p>
M2	<p>CTS have no requirements for fuel oil properties in neither the DG fuel oil storage tanks nor the offsite reserve, except that the reserve oil be compatible with the diesels. ITS require that important properties of fuel oil in both the storage tanks and the reserve be verified at the frequency and to the acceptance criteria specified in ITS. The reserve is maintained by Consolidated Edison Company (Con Ed), according to agreements with the Licensee. The reserve is normally stored in the same tanks used for IP2 reserves. Fuel oil properties are controlled according to IP2 TS and FSAR to meet IP2 and IP3 operability requirements. Required testing of the properties of reserve fuel will be done by IP2 according to Con Ed programs. The Licensee will verify that reserve fuel oil meets ITS requirements. This does not introduce any unanalyzed operation while establishing requirements for fuel oil acceptance criteria and verification. Thus, this change has no significant adverse safety effect.</p>	<p>3.8.3 SR 3.8.3.3 SR 3.8.3.4 5.5.12</p>	<p>3.7 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>CTS do not establish requirements for a minimum DG air start receiver pressure. ITS add a new requirement to verify every 31 days that each DG air receiver is at the minimum pressure required to support at least four start attempts consistent with the requirements in the FSAR Section 8.2. This more restrictive change is acceptable because it does not introduce any operation which is unanalyzed while establishing more conservative requirements for verification of air start receiver pressure than is currently required. Therefore, this change has no negative effect on safety.</p>	<p>SR 3.8.3.5 3.8.3</p>	<p>3.7 4.6</p>
M4	<p>CTS have no requirements to check for and remove water from each DG fuel oil storage tank. ITS adds such a requirement with a 92-day frequency. This is needed since water in a storage tank promotes microbiological fouling which is a major cause of fuel oil degradation. In addition, removal of water from DG fuel oil storage tanks eliminates the potential for water entrainment in the fuel oil during extended DG operation. The 92-day frequency complies with Regulatory Guide 1.137 recommendations. Since this SR is for preventive maintenance, the presence of water does not necessarily represent failure, provided the water is removed during the SR. This more restrictive change does not introduce any unanalyzed operation while requiring more conservative maintenance requirements which help keep fuel oil properties within limits. Thus, this change has no significant adverse effect on safety.</p>	<p>SR 3.8.3.6</p>	<p>3.7 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING			
M1	<p>CTS specify three operable batteries and chargers above cold shutdown. ITS require operability of Batteries 31, 32, 33, and their Chargers; and Battery 34. This adds TS for Battery 34 but not Charger 34. Battery and Charger 34 power bus 34. Previously, bus 34 was supported only by two transformers supplied by separate trains. Though these transformers power bus 34, they are unavailable on loss of offsite power until EDGs repower a train. In addition, Battery 34 powers bus 34 decreasing chances of trip or ESFAS. Charger 34 is not required by ITS since the transformers ensure power to bus 34 even if Charger 34 is unavailable. Besides operability and SRs for Battery 34, ITS add RAs and Completion Times (CTs) when Battery 34 is inoperable. RA A.1 is acceptable since Inverter 34 is the only safety related load supplied by Battery 34. CT is consistent with CT for inoperable battery or charger in any DC subsystem. This has no significant adverse safety effect.</p>	<p>LCO 3.8.4 3.8.7 3.8.4 Condition A RA A.1 Completion Times</p>	<p>3.7.A.6</p>
M2	<p>CTS do not require verification of charger capacity, though the FSAR requires that chargers be able to maintain voltage and current necessary to recharge batteries in 15 hours while carrying their normal load. ITS require verification every 24 months that each charger can supply its battery at voltage and current adequate to demonstrate charger requirements are met. This is needed since batteries will be depleted early in an accident, and chargers must be able to recharge the batteries while feeding post accident DC loads. Acceptance criteria for each charger is identified in the FSAR. This Surveillance must be done during Mode 5 or 6 since it requires the DC subsystem to be inoperable. This more restrictive change is acceptable since it does not introduce an unanalyzed operation while requiring verification that chargers can perform according to design. This change has no significant adverse safety effect.</p>	<p>SR 3.8.4.2</p>	<p>3.7 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>Above cold shutdown, CTS have RAs if the electrical distribution system is not restored to requirements within specified Completion Times (CTs). If the reactor is critical when requirements are unmet, then it must be in hot shutdown within 6 hours and cold shutdown within the following 30, but if it is subcritical when requirements are unmet, RCS temperature and pressure may not be increased more than 25 °F and 100 psi. Under these conditions, ITS require the reactor to be in Mode 3 in 6 hours and Mode 5 in 36 regardless of plant status. The CTS allowance is eliminated. This removes ambiguity created by CTS when performing reactor shutdown and cooldown required by CTS and ensures that the plant is outside LCO Applicability when LCO requirements are unmet. This change is acceptable since placing the plant outside LCO Applicability when LCO requirements are unmet is conservative and there is no change in the CTS 3.7.C.1 requirement. This has no significant adverse effect on safety.</p>	<p>3.8.4 RA C.1</p> <p>3.8.4 RA C.2</p>	<p>3.7.C</p> <p>3,7,C.1</p> <p>3.7.C.2</p>
M4	<p>CTS require that the voltage of each battery must be measured every month; however, acceptance criteria is not included in the Technical Specifications. ITS maintain this requirement; however, the explicit acceptance criteria for each battery is included in the Technical Specifications. This more restrictive change is acceptable because it does not introduce any unanalyzed operation while requiring periodic battery voltage acceptance criteria consistent with design requirements. Thus, this change has no significant adverse effect on safety.</p>	SR 3.8.4.1	4.6.B.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	<p>CTS require a battery performance discharge test every 60 months with 12 months accelerated frequency if: battery has < 90% manufacturer's rating; or, capacity drops > 10% rated capacity. ITS require a battery performance discharge test every 60 months with 12 months accelerated frequency if: battery shows degradation or has reached 85% expected life and capacity is < 100% manufacturer's rating. In addition, if battery shows no degradation but has reached 85% expected life, frequency is reduced to 24 months for batteries that retain capacity \geq 100% manufacturer's rating. Degradation is indicated when capacity drops > 10% relative to last test or when it is \geq 10% below manufacturer's rating. This is acceptable since these frequencies are more restrictive than current ones and consistent with IEEE-450-1995. This has no significant adverse safety effect.</p>	SR 3.8.4.4	4.6.B.4 4.6.B.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN			
M1	<p>In cold shutdown, refueling, or when moving fuel, CTS do not require operability or surveillance of batteries and chargers except that they support other required features. ITS set operability and surveillance requirements for DC subsystems needed to support the DC distribution subsystem required by LCO 3.8.10. LCO 3.8.5 is more restrictive: it requires batteries and chargers be operable. This includes meeting required SRs if the battery supports other required features. However, ITS does not require battery and charger SRs if they would make the battery or charger inoperable. This applies if the SRs in question are still met. LCO 3.8.5 also provides an additional option if a battery or charger cannot support required features. It allows suspending core alterations, fuel movement, and operations involving positive reactivity additions. These actions are sufficiently conservative so that it is acceptable to avoid declaring each of the supported features inoperable and taking RAs for each of these features. Finally, LCO 3.8.5 sets requirements for features required to mitigate consequences of a fuel handling accident when irradiated fuel is being moved even if these features would not otherwise be required. These more restrictive changes are acceptable since they do not introduce any unanalyzed operation while requiring more conservative requirements to ensure batteries and chargers are operable when needed to support features required to prevent or mitigate an accident. This change has no negative safety effect.</p>	<p>LCO 3.8.5 SR 3.8.5.1 LCO 3.8.10</p>	<p>3.7.F 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.6 - BATTERY CELL PARAMETERS			
M1	<p>CTS require verification that battery parameters are within operability limits, but no acceptance criteria are set. Thus, procedures that implement CTS 4.6.B include acceptance criteria based on IEEE-450 and manufacturer's recommendations. If these criteria are unmet, then batteries are inoperable. ITS keep the CTS criteria for battery operability which are identified as Category C Allowable Limits, but also set new criteria identified as Category A and B Limits. Category A and B limits are more restrictive than Category C limits, but failure to meet Category A or B limits does not require immediate declaration that a battery is inoperable. Category A and B limits are the acceptance criteria for ITS SR 3.8.6.1 and 3.8.6.2, respectively. This change is needed because failure to meet Category A or B limits indicates battery degradation that may require action even if the battery could still perform its safety function. Thus, if Category A or B limits are unmet, then ITS require verification within 1 hour that Category C limits are met for pilot cells. Further, RA A.2 requires accelerated verification of battery parameters, and RA A.3 requires restoration to within Category A and B limits within 31 days. This change is acceptable since the CTS acceptance criteria used to establish battery operability are in ITS as Table 3.8.6-1 Category C Allowable Limits. This change has no significant adverse safety effect while requiring more aggressive response to preliminary indications of battery deterioration.</p>	<p>3.8.6 Table 3.8.6-1</p> <p>3.8.6 RA A.1</p> <p>3.8.6 RA A.2</p> <p>3.8.6 RA A.3</p> <p>SR 3.8.6.1</p> <p>SR 3.8.6.2</p>	4.6.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING			
M1	<p>CTS allow only one 120V AC instrument bus on the backup power supply. CTS are interpreted as requiring three inverters operable with one allowed to be inoperable indefinitely. Under the same conditions, ITS require all four inverters and the two constant voltage transformers (CVTs) able to supply 120V AC VIB 34 to be operable. This adds TS requirements for inverter 34 which was installed in 1979 to provide more stable and reliable power to 120V AC VIB 34 that supports RPS and ESFAS channel III. In addition, this change adds TS requirements for the two CVTs able to supply VIB 34. This ensures TS are consistent with FSAR, RPS and ESFAS channel III have stable, reliable power, and Generic Letter 91-011 commitments are incorporated. Design details, accident assumptions, and operability requirements are in ITS Bases. These changes introduce no unanalyzed operation while setting more conservative requirements to limit the time instrumentation and controls for RPS and ESFAS are not powered from the preferred uninterruptible source. This change has no negative safety effect.</p>	<p>LCO 3.8.7 LCO 3.8.5</p>	<p>3.7.A 3.7.A.7 3.7.A.6</p>
M2	<p>CTS is interpreted as requiring three of the four inverters Operable with one of the three required inverters allowed to be inoperable indefinitely. Otherwise, CTS require Plant shutdown. Under the same conditions, ITS require that all four inverters and the 2 CVTs capable of supplying VIB 34 are operable. This change establishes Conditions A, B and C and the associated Required Actions when any one of the four inverters or one or both CVTs associated with VIB 34 are inoperable. This is a more restrictive change because CTS allow operation to continue indefinitely with two of the four inverters inoperable and CTS do not restrict operation of the 2 CVTs able to supply VIB 34. A detailed description and justification for LCO 3.8.7, Conditions A, B and C and the associated RAs, is incorporated into the ITS Bases. These changes do not introduce any operation that is un-analyzed while requiring more conservative requirements for allowable out of service times for inverters and the CVTs associated with VIB 34. This change has no negative effect on safety.</p>	<p>3.8.7 Condition A 3.8.7 Condition B 3.8.7 Condition C</p>	<p>3.7.A.7 3.7.A 3.7.C</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>Above cold shutdown, CTS set RAs if the electrical distribution system is not restored within specified Completion Times (CTs). CTS say that, if the reactor is critical when requirements are unmet, then it shall be in hot shutdown within 6 hours and cold shutdown within the following 30, but if the reactor is subcritical when requirements are unmet, CTS require only that RCS temperature and pressure not be increased more than 25 °F and 100 psi over existing values. Under these conditions, ITS require the reactor to be in Mode 3 in 6 hours and Mode 5 in 36 regardless of Plant status when the Condition is identified. The allowance provided in CTS 3.7.C.2 is deleted. This eliminates ambiguity created by CTS 3.7.C.2 when performing reactor shutdown and cooldown required by CTS 3.7.C.1 and ensures that the Plant is outside the LCO Applicability when LCO requirements are unmet. Placing the plant outside the LCO Applicability when LCO requirements are unmet is conservative and there is no change in the CTS 3.7.C.1 requirement. This change has no significant adverse safety effect.</p>	<p>3.8.7 RA B.1</p> <p>3.8.7 RA B.2</p>	<p>3.7.C</p> <p>3.7.C.1</p> <p>3.7.C.2</p>
M4	<p>CTS do not establish requirements for testing inverters that supply the four 120V AC instrument vital buses from associated 125V DC buses. ITS establish a new requirement for periodic verification that the inverters are functioning properly with all required circuit breakers closed and AC vital buses energized from the inverter. The verification of proper voltage and frequency output ensures that the required power is available for the instrumentation of the RPS and ESFAS connected to the AC vital buses. Frequency verification for inverter 34 is not required since it does not have installed instrumentation to indicate this parameter. The seven day frequency takes into account the redundant capability of the inverters and other indications available in the CR that alert the operator to inverter malfunctions. This change does not introduce any unanalyzed operation while requiring more conservative requirements for verification of the operability of the uninterruptible power sources for instrumentation and controls for RPS and ESFAS. This change has no negative effect on safety.</p>	SR 3.8.7.1	<p>3.7</p> <p>4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M5	<p>CTS do not establish any specific requirements for Operability or testing of the CVTs associated with VIB 34. ITS LCO 3.8.7 adds new requirements for the Operability of the 2 CVTs associated with VIB 34 (See ITS 3.8.7, DOC M.1). In conjunction with this change, ITS SR 3.8.7.2 is added to verify Operability of these CVTs by demonstrating that the power supply to VIB 34 can be manually transferred from the inverter to each of the required CVTs. This SR ensures that power to VIB 34 can be maintained after the depletion of battery 34. The 24 month Frequency takes into account that either of the CVTs is capable of performing this safety function and the demonstrated reliability of this equipment. This more restrictive change is acceptable because it does not introduce any operation that is un-analyzed while requiring a more conservative requirements for verification of the Operability of the CVTs associated with VIB 34. This change has no negative impact on safety.</p>	<p>LCO 3.8.7 SR 3.8.7.2</p>	<p>3.7 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN			
M1	<p>CTS have no requirements for operability or surveillance testing of inverters supplying the 120V AC instrument vital buses (VIBs) in cold shutdown, refueling, or moving fuel. Even when features powered from VIB are required operable, CTS allow VIBs to be powered from the backup constant voltage transformers (CVTs) supplied from associated 480V MCCs. Under these conditions, ITS require operability and testing of any inverter needed to support the DC electrical power distribution subsystem required by LCO 3.8.10. The adoption of LCO 3.8.8 is more restrictive since it requires operable inverters, which includes meeting the required SR, if the inverter supports operability of any other required features. In addition, ITS allow suspending core alterations, fuel movement, and operations involving positive reactivity additions if an inverter is inoperable. This is sufficiently conservative so that it is acceptable to avoid declaring each of the supported features inoperable and taking the RAs for each of these features. These changes do not introduce any unanalyzed operation while requiring more conservative requirements to ensure that inverters are operable when needed to support features required to prevent or mitigate an accident. This change has no negative safety effect.</p>	<p>LCO 3.8.8 LCO 3.8.10</p>	<p>3.7.F 4.6</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING			
M1	<p>Above cold shutdown, CTS require four 480V buses be energized and tie breakers between buses 5A and 2A, and 3A and 6A, be open. CTS also require operable DC distribution systems. Finally, CTS imply that four 120V AC VIBs must be operable. ITS require AC, DC, and VIB distribution subsystems for trains 5A, 2A/3A, and 6A be operable. A list of what constitutes AC, DC, and VIB electrical power distribution subsystems for trains 5A, 2A/3A and 6A is in ITS Bases. This is more restrictive since ITS Bases include a list of buses required operable. This ensures availability of all AC, DC, and VIB buses assumed available to support systems required to shut down the reactor and keep it in a safe condition post accident. This introduces no unanalyzed operation while specifying more conservative requirements to ensure that all AC, DC, and VIB buses are operable when needed to support features required to prevent or mitigate an accident. This has no significant adverse safety effect.</p>	<p>LCO 3.8.9 Table B 3.8.9-1</p>	<p>3.7.A.4 3.7.A.6 3.7.A.7</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	<p>CTS do not set any requirements for surveillance testing of AC and DC distribution systems. ITS add periodic verification that the required AC, DC, and VIB electrical power distribution systems are functioning properly, with the correct circuit breaker alignment. This change is needed to ensure the appropriate separation and independence of the electrical divisions is maintained, and the appropriate voltage is available to each required bus. The 7 day Frequency takes into account the redundant capability of the AC, DC, and AC vital instrument bus electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions. This more restrictive change is acceptable because it does not introduce any operation which is un-analyzed while requiring more conservative requirements for ensuring that all AC, DC, and AC vital instrument buses are operable whenever needed to support features required to prevent or mitigate an accident. This change has no adverse impact on safety.</p>	SR 3.8.9.1	3.7 4.6
M3	<p>Above cold shutdown, CTS have RAs if the electrical distribution system is not restored to requirements within Completion Times (CTs). CTS say that, if the reactor is critical when requirements are unmet, then it must be in hot shutdown within 6 hours and cold shutdown within the following 30, but if the reactor is subcritical when requirements are unmet, RCS temperature and pressure may not increase > 25 °F and 100 psi over existing values. ITS require the reactor be in Mode 3 in 6 hours and Mode 5 in 36 regardless of plant status when the Condition is identified. The CTS allowance is removed. This eliminates ambiguity created by CTS when shutting and cooling down and ensures that the plant is outside Applicability when the requirements are unmet. Placing the plant outside the Applicability is conservative, and there is no change in the CTS 3.7.C.1 requirement. This has no significant adverse safety effect.</p>	3.8.9 RA D.1 3.8.9 RA D.2	3.7.C 3.7.C.1 3.7.C.2

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN			
M1	<p>CTS require that two of four 480-volt buses be energized under all conditions. ITS require operability of all portions of AC, DC, and AC vital instrument bus (VIB) electrical power distribution subsystems required to support equipment required operable by other ITS LCOs. This is a more restrictive change since some combinations of two of the four 480-volt buses will be insufficient to support all equipment required operable in Modes 5 and 6 or when moving irradiated fuel. This change is needed because AC, DC, and VIB electrical power distribution subsystems are support systems that must be operable as necessary to support features required by other ITS LCOs. This more restrictive change is acceptable since it does not introduce any unanalyzed operation while requiring more conservative requirements to ensure that all AC, DC, and AC VIBs are operable whenever needed to support features required to prevent or mitigate an accident. This change has no negative safety effect.</p>	LCO 3.8.10	3.7.F.3
M2	<p>CTS have no RA if AC or DC subsystem, or VIBs supporting equipment required by other ITS LCOs are inoperable. Thus, CTS indirectly require equipment powered from an inoperable source be declared inoperable and associated RAs taken. ITS, however, allow suspending core alterations, fuel movement, and operations involving positive reactivity addition instead of taking RAs for each component, but these RAs may be insufficient to address coolant circulation and heat removal concerns if an operating RHR subsystem is de-energized. Thus, the ITS option does not apply to RHR subsystems. Since CTS have no RAs for inoperable components in cold shutdown, adding the ITS option is more conservative. This introduces no unanalyzed operation while requiring more conservative RAs when AC or DC subsystems, or VIBs needed to support features required to prevent or mitigate an accident are inoperable. This has no negative safety effect.</p>	LCO 3.8.10	3.7.F 4.6

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>CTS do not have surveillance testing requirements for distribution systems when these systems are required to be operable. ITS add verification that the required AC, DC, and AC VIB electrical power distribution subsystems function properly and that all the buses are properly energized. The verification of proper voltage availability on the buses ensures that required power is readily available for motive and control functions for critical system loads connected to these buses. The seven-day frequency takes into account the ability of the electrical power distribution subsystems, and other indications available in the Control Room that alert the operator to subsystem malfunctions. This more restrictive change is acceptable since it does not introduce any unanalyzed operation while setting more conservative requirements to ensure that all AC, DC, and AC VIB are operable when needed to support features required to prevent or mitigate an accident. This change has no negative safety effect.</p>	SR 3.8.10.1	<p>3.7</p> <p>4.6</p>

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION			
	NONE		
ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION			
M1	<p>CTS and ITS require suspending core alterations and positive reactivity additions if only one SRM is operable and initiating action to restore at least one SRM whenever both are inoperable. CTS do not require more frequent verification of boron concentration of all filled portions of the RCS and the refueling canal if no SRMs are operable. ITS LCO 3.9.2, Required Action B.2, is added to require performing SR 3.9.1.1, boron concentration verification, once per 12 hours if two required source range neutron flux monitors are inoperable.</p>	<p>3.9.2 Actions SR 3.9.1.1</p>	<p>3.8.A.4 3.8.B</p>
M2	<p>CTS require that the subcritical core be continuously monitored by SRMs in Mode 6; however, no surveillance requirements exist for the periodic calibration of SRMs during refueling. ITS SR 3.9.2.2 is added to require performance of an SRM channel calibration every 24 months.</p>	<p>SR 3.9.2.2</p>	<p>3.8.A.4</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	<p>CTS specify that only one source range monitor (SRM) is required if core geometry is not being changed; thus, only one SRM is required during a positive reactivity addition not involving a change to core geometry. ITS require 2 SRMs Operable in Mode 6 and suspending Core Alterations and positive reactivity additions if only one SRM is Operable. Therefore, ITS LCO 3.9.2 requires 2 SRMs during a positive reactivity addition that does not involve a change to core geometry.</p>	LCO 3.9.2	3.8.A.4

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS			
M1	CTS require that at least one isolation valve be operable, locked closed, or blind flanged in each line penetrating the containment that provides a direct path from containment atmosphere to the outside; however, no explicit requirement exists to verify periodically that this requirement is met. ITS retains this requirement, and requires verification every 7 days.	SR 3.9.3.1 LCO 3.9.3.c LCO 3.9.3.e	3.8.A.2
M2	CTS and ITS require that the Containment Building Vent and Purge System be properly aligned if fuel is moved prior to a specified decay time. ITS adds a requirement for periodic verification.	SR 3.9.3.2	3.8.A.9
M3	CTS requires that the Containment Vent and purge Systems be properly aligned if fuel is moved prior to a specified decay time. ITS maintains the requirement for the purge system but does not allow the Vent System to be aligned for use during this period. ITS requires that the Vent System be isolated.	LCO 3.9.3.e	3.8.A.9
M4	CTS and ITS require that at least one isolation valve be operable, locked closed or blind flanged in each line penetrating containment. ITS further requires that an “operable isolation valve” must be an automatic valve.	3.9.3.c.1	3.8.A.2
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION -- HIGH WATER LEVEL			
M1	CTS require forced flow in the RCS in Mode 6, but have no explicit CTS requirement for periodic verification of the flow or the minimum flow rate. ITS require verification every 12 hours that the required RHR loop is in operation and circulating reactor coolant at a flow rate ≥ 1000 gpm.	SR 3.9.4.1	3.8.A.5

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	CTS require one RHR loop in operation except during core alterations in which RHR flow interferes with component positioning. ITS keep this requirement, but limit the time that the required RHR pump may be removed from operation to ≤ 1 hour per 8 hour period and only if no operations are permitted that would reduce RCS boron concentration.	LCO 3.9.4	3.8.A.5
M3	CTS require redundant decay heat removal and forced flow in the RCS; these requirements apply during “handling operations.” ITS keep the requirements, but expand applicability to Mode 6. In addition, ITS require closing all containment penetrations providing direct access from containment atmosphere to the outside atmosphere within 4 hours.	LCO 3.9.4 LCO 3.9.5	3.8.A.5 3.8.A.13
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL			
M1	CTS require two Operable RHR loops with one pump in operation. No explicit requirement exists for periodic verification of the status of the Operable pump not in operation. ITS retains the requirement, but adds verification every 7 days that breaker alignment is correct and that power is available to the Operable pump not in operation.	3.9.5 SR 3.9.5.2	3.8.A.5 3.8.A.13
M2	CTS require redundant decay heat removal and forced flow in the RCS. These apply during “handling operations.” ITS retains the requirements, but expands Applicability from “handling operations” to Mode 6. ITS also requires closing all containment penetrations providing direct access from containment to outside atmosphere within 4 hours.	LCO 3.9.4 LCO 3.9.5	3.8.A.5 3.8.A.13

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	CTS require redundant decay heat removal and forced flow in the RCS; this applies during “handling operations.” However, the CTS does not have an explicit RCS flow verification requirement. ITS retains the CTS requirements, and adds the requirement to verify RCS loop operation and flow.	SR 3.9.5.1	3.8.A.5
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL			
M1	CTS require a minimum water level of 23 feet above the reactor vessel flange whenever irradiated fuel is being moved, but, there is no explicit requirement for periodic verification that this requirement is met. ITS retains the requirement that refueling cavity water level to be within the specified limits and adds verification every 24 hours.	SR 3.9.6.1	3.8.A.10

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

DOC	Summary of Change	Control	Change Type
M1	<p>CTS do not specify requirements for the nominal center to center distance between fuel racks in the new or spent fuel storage facility or the design limitations that prevent inadvertent draining of the spent fuel pool. ITS adds the following design limitations: the minimum center to center distance between fuel assemblies placed in the high density portion of the fuel storage racks; the minimum center to center distance between fuel assemblies placed in the lower density portion of the fuel storage racks; the minimum center to center distance between fuel assemblies placed in the new fuel storage racks; and, the minimum level that must be maintained by the spent fuel storage pool in the event of an inadvertent drain down. This change is needed because these details are design features that, if altered or modified, would affect safety, and are not included in the categories described in 10 CFR 50.36(c). This is a More Restrictive change because it adds design limitations to the TS.</p>	<p>4.3 4.3.1.2.c 4.3.1.1.c 4.3.1.1.d 4.3.2</p>	5.4

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.1 - RESPONSIBILITY			
M1	<p>CTS 6.1.1 specifies that during periods when the Site Executive Officer is unavailable, one of the General Managers will assume his or her responsibilities or the Site Executive Officer may delegate this responsibility to other qualified supervisory personnel. Under the same conditions, ITS 5.1.1 requires that the delegation of this responsibility during the absence of the Site Executive Officer be in writing. This change is needed because it eliminates any potential ambiguity regarding the person responsible for overall unit operation at any time. This change is acceptable because a requirement that the designation of responsibility for overall unit operation be in writing has no significant adverse effect on plant safety.</p>	5.1.1	6.1.1
M2	<p>ITS add a specific requirement that the plant manager, or his or her designee, must approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety. This requirement is not specifically stated in the CTS, although it is implied. This change is needed because it eliminates ambiguity regarding the plant manager's responsibility to approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety. This change is acceptable because a specific statement of this implied requirement has no significant adverse effect on plant safety.</p>	5.1.1	<p>6.5.1.7 6.5.1.6.a 6.5.1.6.b 6.5.1.6.c 6.5.1.6.d 6.5.1.6.e</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M3	ITS add specific statements that the shift supervisor (SS) is responsible for the CR command function. In addition, ITS require that the SS delegate this responsibility to an individual with an active Senior Reactor Operator (SRO) license during his or her absence from the CR when in Modes 1, 2, 3, or 4 or to an individual with an active SRO or RO license when in Modes 5 or 6. This change is needed because it eliminates ambiguity regarding the person responsible for the CR command function. This change is acceptable because the specific requirement to designate an individual with the appropriate qualifications as having the CR command function is consistent with the intent of 10 CFR 50.54.m.2 (iii) and 10 CFR 50.54.m.2 (iv).	5.1.2	
ITS SPECIFICATION 5.2 - ORGANIZATION			
M1	CTS do not specifically prohibit routine deviation from overtime restrictions nor require that the plant manager or his or her designee periodically review individual overtime to ensure that excessive hours have not been assigned. ITS include these requirements. These changes are needed because the new requirements ensure that overtime restrictions are properly understood and implemented. Currently and under ITS, the periodic review of individual overtime will be performed by unit managers. These changes have no significant adverse effect on safety and are consistent with current practice.	5.2.2.e	6.2.2.g
ITS SPECIFICATION 5.3 - UNIT STAFF QUALIFICATIONS			
	NONE		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.4 - PROCEDURES			

Discussion of Change	Summary of Change	ITS Section	CTS Section
M1	<p>CTS include a list of the activities identified in the TS for which written procedures must be established, implemented, and maintained. ITS specify that each program specified in ITS must be included in this list. Therefore, ITS add the following activities identified in the TS for which written procedures must be established, implemented, and maintained:</p> <p style="text-align: center;"> Primary Coolant Sources Outside Containment Post Accident Sampling Component Cyclic or Transient Limit Reactor Coolant Pump Flywheel Inspection Program Inservice Testing Program Steam Generator (SG) Tube Surveillance Program Ventilation Filter Testing Program (VFTP) Explosive Gas and Storage Tank Radioactivity Monitoring Diesel Fuel Oil Testing Program TS Bases Control Program Safety Function Determination Program (SFDP) Containment Leakage Rate Testing Program </p> <p>Although IP3 already established, implements, and maintains written procedures for most of these programs the addition of specific requirements to have written procedures for these programs is a more restrictive change with no significant adverse effect on safety.</p>	<p>5.4.1</p> <p>5.5</p> <p>5.5.2</p> <p>5.5.3</p> <p>5.5.5</p> <p>5.5.6</p> <p>5.5.7</p> <p>5.5.8</p> <p>5.5.10</p> <p>5.5.11</p> <p>5.5.12</p> <p>5.5.13</p> <p>5.5.14</p> <p>5.5.15</p>	6.8.1

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	ITS is added to require that written procedures must be established, implemented, and maintained for emergency operating procedures required to implement the requirements of NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. Although IP3 already meets this requirement, the addition of a specific requirement to have written procedures for emergency operating procedures is a more restrictive change with no significant adverse effect on safety.	5.4.1.b	NONE
M3	ITS 5.4.1.c is added to require that written procedures must be established, implemented, and maintained for quality assurance for effluent and environmental monitoring. The addition of specific requirements to have written procedures for quality assurance for effluent and environmental monitoring is a more restrictive change with no significant adverse effect on safety.	5.4.1.c	NONE
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS			
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)			
	NONE		
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT			
	NONE		
ITS SPECIFICATION 5.5.3 - POST ACCIDENT SAMPLING			
	NONE		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.4 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.5 - COMPONENT CYCLIC OR TRANSIENT LIMIT			
M1	Component Cyclic or Transient Limit, is added to the ITS to provide a TS program to track the FSAR, Section 4.1.5, cyclic and transient occurrences to ensure that components are maintained within the design limits. The addition of a new program for the control of existing FSAR requirements is more restrictive, and has no significant adverse effect on safety.	5.5.5	NONE
ITS SPECIFICATION 5.5.6 - RCP FLYWHEEL INSPECTION PROGRAM			
M1	The RCP Flywheel Inspection Program is added to the ITS to provide a TS program for the inspection of each RCP flywheel. The program will include inspection frequencies and acceptance criteria. The inspection frequency will ensure that each RCP flywheel is surface and volumetrically inspected within 10 years after a flywheel is placed in service following inspection. The addition of a TS requirement to establish a formal program to manage existing commitments for the periodic inspection of RCP flywheels is a more restrictive change with no significant adverse effect on safety.	5.5.6	NONE
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM			
	NONE		

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.8 - SG TUBE SURVEILLANCE PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.9 - SECONDARY WATER CHEMISTRY PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)			
M1	<p>CTS specify the surveillance frequency for visual inspections of the Containment Air Filtration System and CR Air Filtration System, respectively, as once per 24 months or at any time fire, chemical releases or work done on the filters could alter their integrity. CTS specify the surveillance frequency for visual inspections of the Fuel Storage Building Emergency Ventilation System as in accordance with ANSI N 510 (1975). CTS do not establish any requirements for visual inspection of the containment purge filtration system. ITS specify that inplace testing of the high efficiency particulate air (HEPA) filters and charcoal adsorbers for CR Ventilation System, Containment FCU, Fuel Storage Building Emergency Ventilation System, and Containment Purge System must be conducted according to Regulatory Guide 1.52 which requires a visual inspection according to the provisions of ANSI N 510 (1975) in conjunction with any required air flow distribution test, HEPA filter, or charcoal adsorber test. This change may result in more frequent visual inspections of ventilation systems when HEPA filter or charcoal adsorber tests are performed for reasons other than the normal 18 or 24 month frequency. This change has no significant adverse effect on safety.</p>	<p>5.5.10.a</p> <p>5.5.10.b</p>	<p>4.5.A.4.a</p> <p>4.5.A.5.a</p> <p>4.5.A.6.c.4</p> <p>4.13.B</p>

Discussion of Change	Summary of Change	ITS Section	CTS Section
M2	CTS identify fire and chemical releases as conditions that would require ventilation filter testing. ITS expand the list of conditions that require ventilation filter testing to include significant painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation. This change is needed to establish testing requirements consistent with Regulatory Guide 1.52. This more restrictive change is acceptable because it does not introduce any operation which is un-analyzed while requiring a more conservative approach to testing safety related ventilation filters than is currently required. Therefore, this change has no significant adverse effect on safety.	5.5.10	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B
M3	CTS identify "work done on the filters that could alter their integrity" as a condition that would require performance of ventilation filter testing. ITS expand the list of conditions that require ventilation filter testing to include any structural maintenance that could alter system integrity. This change is needed to establish testing requirements consistent with Regulatory Guide 1.52. This more restrictive change is acceptable since it does not introduce any operation which is un-analyzed while requiring a more conservative approach to testing safety related ventilation filters than is currently required. Therefore, this change has no significant effect on safety.	5.5.10	4.5.A.4 4.5.A.5 4.5.A.6
M4	CTS identify specific test required to be performed and associated acceptance criteria for ventilation filter testing. ITS require that these tests be conducted according to Regulatory Guide 1.52 and ANSI N510-1975. Requiring that ventilation filters are tested according to Regulatory Guide 1.52 and ANSI N510-1975 is a more restrictive change with no significant adverse effect on safety.	5.5.10	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B

Discussion of Change	Summary of Change	ITS Section	CTS Section
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM			
	NONE		
ITS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM			
M1	There are no CTS or FSAR requirements for testing diesel fuel oil. ITS add a requirement that a diesel fuel oil testing program be maintained with specific TS requirements for acceptance criteria and testing frequency.	5.5.12	NONE
ITS SPECIFICATION 5.5.13 - TS BASES CONTROL PROGRAM			
M1	ITS establish TS requirements for licensee controlled changes to the ITS Bases. The addition of a TS Bases Control Program is a more restrictive change with no significant adverse effect on safety.	5.5.13	NONE
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)			
M1	ITS set TS requirements that ensure a loss of safety function resulting from support system inoperability is detected and appropriate actions are taken. The addition of a Safety Function Determination Program is a more restrictive change with no significant adverse safety effect.	5.5.14	NONE
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM			

Discussion of Change	Summary of Change	ITS Section	CTS Section
	NONE		
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS			
	NONE		
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA			
	NONE		

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L1	<p>CTS define " Power Operation" as reactor power > 2% rated power (RTP). CTS LCOs applicable in Power Operation apply when reactor power is > 2% RTP. ITS define "Power Operation" as reactor power > 5% RTP. ITS LCOs applicable in Power Operation apply when reactor power is > 5% RTP. This change increases the power level used to go from Mode 2 to 1 from 2% to 5% RTP thus increasing the level at which Mode 1 LCOs apply.</p>	Table 1.1-1	1.2.4	I
L2	<p>CTS defines "Dose Equivalent I-131" as that concentration of I-131 that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 present. The thyroid dose conversion factors used for this calculation must be those listed in Table III of TID-14844. ITS keep this definition except that they specify that thyroid dose conversion factors from either of two other references are also acceptable.</p>	1.1	1.15	II
L3	<p>The CTS definition of " Instrument Channel Functional Test" requires injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating actions. The equivalent ITS Definition, "Channel Operation Test," keeps this requirement but allows an actual or simulated signal to verify that a channel is Operable.</p>	1.1	1.9.2	II

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L4	The CTS definition of " Instrument Channel Functional Test" requires injection of a signal into the channel to verify that it is Operable, including alarm and/or trip initiating actions. The equivalent ITS Definition, Channel Operation Test (COT), maintains this requirement with additional clarifications.	1.1	1.9.2	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

Discussion of Change	Summary of Change	ITS Section	CTS Section
	NONE		

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L1	This change provides an exception to ITS to permit restoring inoperable equipment to an operable status, to demonstrate the operability of the equipment being returned to service, or to demonstrate that other equipment or variables are within limits.	LCO 3.0.5 LCO 3.0.2	None	V
L2	If an SR is missed, CTS have a grace period to delay Required Actions (RAs) 24 hours that applies only if the Action has a < 24-hour Completion Time. ITS also have a grace period, but it is based on SR frequency instead of Completion Time for the Action. Specifically, ITS allow a period of the lesser of 24 hours or the specified SR frequency. This is less restrictive change for Completion Times of >24-hours, and more restrictive change for Completion Times of <24-hours.	SR 3.0.3	4.1	III

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN				
	NONE			
ITS SPECIFICATION 3.1.2 - CORE REACTIVITY				
L1	This change adds Applicability (Modes 1 and 2) for the core reactivity requirement.	3.1.2	3.10.10	I
L2	This change adds RAs and associated completion times for the core reactivity requirement.	LCO 3.1.2	3.10.10	IV
ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)				
L1	This change adds RAs and associated completion times for the moderator temperature coefficient.	LCO 3.1.3	3.1.C.1	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS				
L1	This change removes CTS requirement to reduce the high flux trip setpoint when a rod is not within alignment limits. The ITS RA more directly protects fuel safety limits by requiring a specific power reduction.	3.1.4	3.10.5.2	IV
L2	This change relaxes surveillance frequency for verifying rod freedom of movement from 31 days to 92 days.	SR 3.1.4.2	Table 4.1-3	II
ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS				
L1	This change eliminates the explicit requirement in this specification that shutdown margin be met when performing rod freedom of movement surveillance (SR 3.1.4.2).	3.1.5	3.10.4.4 3.10.1	II
ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS				
L1	This change eliminates the explicit requirement that shutdown margin must be met when performing control rod freedom of movement surveillance.	3.1.6	3.10.4.4	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION				
L1	This change adds a completion time for the RA that addresses inoperable rod position indicators.	3.1.7	3.10.6.1	III
L2	This change adds RA for a condition involving an inoperable demand position indicator.	3.1.7	3.10.6	IV
L3	This change establishes RA's for more than one IRPI per group inoperable per TSTF-234.	3.1.7	3.10.6.2	V
ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.2 - POWER DISTRIBUTION LIMITS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_q(Z)$)				
L1	CTS requires a proportional reduction of the high neutron flux trip setpoint whenever a hot channel factor exceeds its specified limit; However, no completion time is specified. ITS maintains this requirement; however, a Completion Time of 72 hours after each $F_q(Z)$ determination is specified.	3.2.1	3.10.2.2.2	III
ITS SPECIFICATION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^H$)				
L1	CTS requires a proportional reduction in reactor power and trip setpoints if limits for $F_{\Delta H}^N$ are not met; however, no completion time is specified, which implies these Actions must be initiated immediately. ITS maintains these requirements; however, ITS specifies a Completion Time of 4 hours for power reduction and a Completion Time of 72 hours for trip setpoint reduction.	3.2.2	3.10.2.2.2	III

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS requires a reduction in reactor power and trip setpoints if limits for $F_{\Delta H}^N$ are not met and requires subsequent verification that these actions were effective. If not effective, then CTS requires that the reactor be brought to a hot shutdown condition with return to power authorized only for physics testing. ITS maintains these requirements; however, if subsequent verification demonstrates that the reduction in reactor power does not result in $F_{\Delta H}^N$ limits being met, then ITS requires that the reactor be in Mode 2 (outside the LCO Applicability) within 6 hours (versus a reactor shutdown to hot shutdown conditions required by CTS).</p>	3.2.2	3.10.2.2.2	I, IV
ITS SPECIFICATION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)				
L1	<p>CTS requires that if AFD deviates from the target band for more than 1 hour in any 24-hour period when operating > 50% RTP and < 90% RTP, then power must be reduced to < 50% RTP, and the high neutron flux trip setpoint must be reduced to < 55% RTP. Under the same conditions, ITS maintains the requirement to reduce power to <50% RTP; however, there is no requirement to reduce the high neutron flux trip setpoint.</p>	3.2.3	3.10.2.6.2	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS does not explicitly establish when AFD limits apply. CTS allows unlimited operation when < 50% RTP even if AFD limits are not met, but , operation > 50% RTP may be limited by AFD penalties that are accumulated based on any power history during the previous 24 hours. Thus, the implied applicability is whenever the reactor is critical. ITS maintains the allowance for unlimited operation but specifies that operation > 50% RTP may be limited by AFD penalties that are accumulated based on power history > 15% RTP during the previous 24 hours. Thus, ITS is Applicable in Mode 1 with Thermal Power > 15% RTP even though unlimited operation < 50% RTP is permitted when AFD limits are not met.</p>	3.2.3	3.10.2 3.10.2.7 3.10.2.7.2	I, V
L3	<p>CTS requires that target flux difference be measured at least once per equivalent full power quarter, although an initial determination of the target flux difference following refueling is not explicitly required. ITS maintains the requirement to determine the target flux difference every 92 EFPDs but allows the initial measurement to be deferred until 31 days after refueling with the interim target flux difference after each refueling determined from design predictions.</p>	SR 3.2.3.4	3.10.2.3	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)				
L1	<p>CTS specifies that the power level must be reduced by three times the amount that QPTR exceeds 1.0 and that the power range high flux trip setpoint must be reduced by the same amount. No completion time is specified, so these Actions must be initiated immediately. Under the same conditions, ITS allows 2 hours to complete the power reduction and does not require any adjustment to the power range high flux trip setpoint.</p>	3.2.4	3.10.3.1.a	III, IV
L2	<p>CTS specifies that thermal power must be reduced to < 50% RTP if QPTR limits are not restored within 24 hours. In addition, CTS specifies actions if QPTR exceeds 1.09; that the reactor be in hot shutdown within 4 hours, and subsequent operation is limited to 50% RTP. Under the same conditions, ITS uses an iterative process to restore QPTR to within limits.</p>	3.2.4	3.10.3.1.b	III, IV
L3	<p>CTS specifies that power level must be reduced to < 50% RTP if QPTR limits cannot be re-established within 24 hours and operation above 50% RTP is prohibited until the QPTR limits are re-established. Under the same conditions, ITS provide specific steps to evaluate the QPTR limit and accomplish a carefully controlled return to 100% RTP.</p>	3.2.4	3.10.3.1.b	III, IV

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.3 - INSTRUMENTATION

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION				
L1	<p>CTS trip setpoint limiting safety system settings are based on the IP3 Plant Manual. ITS will use allowable values calculated using Regulatory Guide 1.105, and ISA-RP67.04. This change has no significant adverse safety effect since the existing limiting safety system settings and the proposed allowable values used the information and methods available at the time to determine instrument settings that ensure that safety limits are not exceeded during any event.</p>	3.3.1	3.5	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS specify that no more than one channel of a set shall be tested at the same time, and, by definition, an instrumentation channel failure shall not be regarded as a channel being tested. ITS allow restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with RAs. This is an exception to LCO 3.0.2 to allow performance of SRs to demonstrate: (a) operability of equipment being returned to service; or (b) operability of other equipment. ITS include the example of this allowance as taking an inoperable channel or trip system out of tripped condition to prevent the trip function from occurring during a SR on another channel in the other system. An example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of trip to permit the logic to function and indicate the appropriate response during an SR on another channel in the same system. Thus, ITS LCO 3.0.5 supersedes the CTS restrictions.</p>	<p>LCO 3.0.2 LCO 3.0.5</p>	3.5.2	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS 3.5.3 and CTS 3.5.4 specify that if requirements for minimum number of channels and/or minimum degree of redundancy cannot be achieved, then the actions specified for that Function, typically plant shutdown, must be initiated immediately (usually interpreted as within one hour). The combination of requirements for minimum number of channels and/or minimum degree of redundancy typically requires that the first inoperable channel for a Function be placed in trip to meet requirements and requires a plant shutdown when a second channel on a single function becomes inoperable. Under the same conditions, ITS 3.3.1, Required Actions, allow 6 hours to restore a channel or place it in trip. In conjunction with this change, ITS 3.3.1 (as modified by TSTF-135 (WOG-58)), Required Actions, always require verification that the inoperable channel does not result in a loss of trip Function before the 6 hour allowable out of service time may be applied. The need for and justification for this change is included in WCAP-10271, "Evaluation of Surveillance Frequencies and Out-of-Service Times for the Reactor Protection Instrumentation System" including Supplement 1, and WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation Systems."</p>	3.3.1	3.5.3 3.5.4	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L4	<p>CTS have a quarterly channel test of power range instruments done not < 30 days before startup; ITS require a Channel Operational Test (COT) before startup only if the SR had not been done in the previous 92 days. CTS have IRM response to a simulated signal done before startup if not done the previous week; ITS keep the COT, but extend frequency to 92 days. CTS do SRM response to a simulated signal before startup if not done in the previous week; ITS keep the COT, but extend frequency to 92 days. The SRM, IRM, and power range low power trip provide redundant and diverse protection for a subcritical rod withdrawal event. Though the FSAR says that SRM and IRM trips are not credited, ITS require Surveillance Tests be done at the normal periodic frequency only, and tests need not be repeated before a specific event, such as startup. ITS ensure required Surveillances have been done in the normal specified interval before entering an applicable Mode or Condition. There are also redundant channels, and any substantial degradation of Power Range Neutron Flux-Low would be evident before scheduled performance of these tests since TS require Channel Checks on redundant operable channels; Power Range Instrument response to reactivity changes is distinctive and well known to operators; and nuclear instrumentation response is monitored closely during reactivity changes. Thus, this change has no safety effect.</p>	<p>SR 3.0.4 SR 3.3.1.8 SR 3.0.4</p>	<p>Table 4.1-1 Item 1 Note ** Table 4.1-1 Item 2 Table 4.1-1 Item 3</p>	II

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L5	<p>CTS require that the monthly calibration of the power range channels include a comparison of the upper and lower axial offset using the incore detectors. ITS keep the requirement to compare results of the incore detector measurements to NIS AFD, but extend the frequency from once per month to every 31 EFPDs. In addition, CTS require a calibration of the excore channels to the incore channels every month. ITS keep the requirement to calibrate the excore channels to the incore channels, but extend the frequency from once per month to every 92 EFPDs. The SR frequency is changed to a function of core exposure with an interval consistent with the current SR frequency if the plant is operated at full power during the SR interval. Operating experience indicates that this frequency is sufficient to compensate for the slow changes in neutron flux patterns during this interval. These SRs are not intended to detect flux tilts that occur quickly for which there are other indications of abnormality that prompt a verification of core power tilt. Therefore, this change has no adverse safety effect.</p>	<p>SR 3.3.1.3 SR 3.3.1.6</p>	<p>Table 4.1-1 Item 1 Note * Remark 3</p>	II
L6	<p>CTS establish requirements to defeat rod withdrawal ability within one hour after the reactor is in Mode 3 for 48 hours as a result of an inoperable RTB. Thus, CTS have an implied Applicability when the Rod Control System is capable of rod withdrawal. ITS require this function operable if the Rod Control System is capable of rod withdrawal or all rods are not fully inserted. Expansion of the applicability to include whenever all control rods are not fully inserted is a less restrictive change. This change has no adverse effect on safety.</p>	<p>TABLE 3.3.1-1 NOTE a</p>	<p>TABLE 3.5-2 NOTE ****</p>	I

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L7	<p>NUREG 1431, Revision 1, Section 3.3.1, Condition R for Reactor Trip Breakers contains Note 1 regarding an allowance to bypass one train for up to two hours for surveillance testing if the other train is operable. ITS Condition L for Reactor Trip Breakers adopts the same note. This allowance is not in CTS explicitly, but CTS set requirements for surveillance testing the reactor trip breakers (CTS Table 4.1-1. item 39), and the system design provides for the use of bypass breakers to allow testing of the RTBs at power as required to meet the surveillance requirement. The two-hour time period is reasonable and consistent with STS. This change has no significant adverse safety effect.</p>	<p>RA L Note 1</p> <p>RA L Note 2</p>	None	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION				
L1	<p>CTS trip setpoint limiting safety system setting are based on the IP3 Plant Manual. ITS will use relaxed allowable values calculated using methodologies that conform to Regulatory Guide 1.105, and ISA-RP67.04. This change is needed because the limiting safety system settings established by IP3 Plant Manual were based on information available at the time regarding instrument performance and methods available at the time for calculating setpoints. This change is acceptable since the allowable values will ensure that sufficient allowance exists between this actual setpoint and the analytical limit to account for known instrument uncertainties. For example these may include design basis accident temperature and radiation effects or process dependent effects. This will ensure that the analytical limit will not be exceeded if the allowable value is satisfied. This change has no significant adverse effect on safety since the existing limiting safety system setting and the proposed allowable values used the information and methods available at the time to determine instrument settings that ensure that safety limits are not exceeded during any event.</p>	3.3.2	None	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS specify: "No more than one channel of a particular protection channel set shall be tested at the same time. By definition, an instrumentation channel failure shall not be regarded as a channel being tested." ITS establish an allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with RAs. The purpose of this Specification is to provide an exception to LCO 3.0.2 The ITS Bases for LCO 3.0.5 include the example of this allowance as taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system. Therefore, ITS LCO 3.0.5 supersedes these restrictions in CTS 3.5.2. This change is acceptable because of the following: (1) ITS 3.3.2, RAs and associated Notes establishing time limits for testing, always requires verification that the inoperable channel does not result in a loss of trip Function before AOT may be applied for testing or inoperability; (2) the duration in test is limited; and (3) WCAP-10271 assumes that more than one channel is tested at a time. Therefore, this change has no significant effect on safety.</p>	<p>LCO 3.0.5 LCO 3.0.2 3.3.2 Actions</p>	3.5.2	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS specify that if requirements for minimum number of channels or minimum degree of redundancy cannot be achieved, than the actions specified for that Function, typically plant shutdown, must be initiated immediately . The combination of requirements for minimum number of channels and minimum degree of redundancy typically requires that the first inoperable channel for a function be placed in trip to meet requirements and requires a plant shutdown when a second channel on a single function becomes inoperable. ITS allow 6 hours to restore a channel or place it in trip. The need for and justification for this change is included in WCAP-10271, "Evaluation of Surveillance Frequencies and Out-of-Service Times for the Reactor Protection Instrumentation System" including Supplement 1, and WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation Systems." This justification was approved by the NRC in Safety Evaluations dated February 1985 and February 1989. Confirmation of the applicability of WCAP-10271 to the Indian Point 3 design and operation has already been confirmed by the NYPA and reviewed by the NRC as part of Technical Specification Amendment 107, dated March 22, 1991. Therefore, this change has no significant adverse effect on safety.</p>	3.3.2 RAs	3.5.3 3.5.4	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L4	<p>CTS require that ESFAS initiation instrumentation must be operable when the plant is not in cold shutdown. ITS 3.3.2 revises the Applicability for all ESFAS Functions such that automatic initiation capability is not required in Mode 4 or if the ESFAS Safety function is satisfied. Manual initiation capability will still be required in Mode 4 and automatic actuation logic and actuation relays will be required in Mode 4 only as necessary to support manual initiation capability and ITS LCO 3.3.6, Containment Purge System and Pressure Relief Line Isolation Instrumentation, and LCO 3.3.7, CRVS Actuation Instrumentation. Eliminating requirements for automatic ESFAS initiation instrumentation in Mode 4 is acceptable because when in Mode 4 there is insufficient energy in the primary or secondary systems to warrant automatic initiation of ESF systems in response to abnormal or accident conditions. Therefore, in Mode 4, adequate time is available for an operator to evaluate unit conditions and respond by manually starting individual systems, pumps, and other equipment to mitigate the consequences of an abnormal condition or accident. Restrictions on manual initiation in Mode 4 are already recognized in TS related to LTOP which requires that SI systems are administratively locked out or otherwise prevented from actuating to prevent inadvertent overpressurization of unit systems. Thus, this change has no adverse safety effect.</p>	<p>3.3.2 LCO 3.3.6 LCO 3.3.7</p>	3.5.1	I

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L5	For the loss of ESFAS redundancy, ITS specify that the plant be in Mode 3 in the following six hours. For the loss of ESFAS function, ITS LCO 3.0.3 specify that a plant shutdown be initiated within one hour and the plant be in Mode 3 within seven hours. ITS revise the CTS for reactor shutdown and cooldown to be consistent with industry accepted standards for these evolutions as established in NUREG-1431, STS, Westinghouse Plants, Revision 1. This change has no adverse effect on safety.	LCO 3.3.2 RAs LCO 3.0.3	Table 3.5-3 Note 6 Table 3.5-4 Note 1	III
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION				
L1	CTS specifies that PAM instrumentation is required whenever the reactor is not in cold shutdown (i.e., Modes 1, 2, 3, and 4). ITS establishes a less restrictive applicability of Modes 1, 2, and 3. This less restrictive change does not have an adverse impact on safety because IP3 safety analyses assume that plant conditions needed for initiation of a DBA exist only when the plant is in Modes 1, 2, or 3.	3.3.3 Applicability	3.5.7	I
L2	CTS establishes requirements for periodic channel checks for various PAM instruments at a frequency of 12 hours. ITS will specify a frequency of 31 days. Certain PAM instruments are also part of RPS (ITS 3.3.1) and ESFAS (ITS 3.3.2). In these cases ITS will maintain the 12 hour frequency in the affected RPS or ESFAS surveillance	SR 3.3.3.1	Table 4.1-1	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION				
L1	Not used.			
L2	<p>CTS specify the following actions when requirements for undervoltage or degraded voltage are unmet: if the 138kV and 13.8kV sources of offsite power are available and the conditions of column 3 or 4 cannot be met within 72 hours, then the requirements of 3.7.C.1 or 2 shall be met. CTS 3.7.C.1 and 3.7.C.2 are the actions taken after the AOT for an inoperable DG has expired. Thus, these CTS statements are equivalent to requiring shutdown in 72 hours. In ITS, a one-hour CT is provided for RAs that can be taken prior to declaring the associated DG inoperable, which then requires a plant shutdown in 72 hours. This is a less restrictive change since ITS allow 73 hours to reach the same plant condition that must be reached in 72 hours under CTS. The 6-hour AOT in Condition A of the NUREG does not apply since the IP3 design is not covered by WCAP 10271. This less restrictive change has no significant adverse safety effect since there is only a slight increase in time from 72 to 73 hours.</p>	<p>3.3.5 Condition A</p> <p>3.3.5 Condition B</p>	<p>Table 3.5-3 Note 1</p> <p>3.7.C.1</p> <p>3.7.C.2</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.3.6 - PRESSURE RELIEF ISOLATION INSTRUMENTATION				
L1	CTS requires testing of isolation instrumentation within 100 hours prior to refueling. ITS modifies test frequency to be 92 days for COT and every 24 months for TADOT. This change is needed so that ITS is consistent with STS by specifying an event (refueling). ITS SR 3.0.4 ensures that the required surveillance is performed prior to entering the applicable mode or condition.	SR 3.3.6.3 SR 3.3.6.4	3.8.A.8	II
ITS SPECIFICATION 3.3.8 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS) ACTUATION INSTRUMENTATION				
L1	CTS require that refueling cease if the FSBEVS is inoperable. ITS 3.3.8, RA A.2 maintains this requirement, but ITS 3.3.8, RA A.1 adds the option of placing the FSBEVS in operation immediately upon discovery that either the manual initiation function or automatic initiation function is inoperable. This option allows fuel handling in the FSB to continue. This action accomplishes LCO safety function and ensures the FSBEVS is in a conservative mode of operation if a fuel handling accident occurs. Therefore, this change does not have a significant adverse effect on safety.	3.3.8 RA A.2 RA A.1 LCO 3.7.13 Bases	3.8.B	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS				
L1	CTS require that the reactor be placed in Hot Shutdown if RCS limits for pressure and temperature are not met and not restored within 2 hours. Under the same conditions, ITS require only reducing reactor power to $\leq 5\%$.	3.4.1 RA B.1	3.1.H.5	I, IV
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY				
L1	CTS require that the plant be in hot shutdown if T_{avg} cannot be kept above 540 °F. Under the same conditions, ITS require that the plant be in Mode 2 with $K_{eff} < 1.0$. The difference is that the CTS require that the reactor be shut down by $\geq 1.3\% \Delta k/k$ when T_{avg} cannot be kept above minimum; whereas, ITS require only that K_{eff} be < 1.0.	3.4.2 RA A.1	3.1.C.3	IV
L2	CTS and ITS both require verification that RCS loop T_{avg} is ≥ 540 °F every 30 minutes if the $T_{avg}-T_{ref}$ deviation and low T_{avg} alarm is not reset. However, CTS requires this verification any time the alarm is not reset; whereas, ITS SR 3.4.2.1 requires this verification only if any RCS loop average temperature is < 547 °F.	SR 3.4.2.1	Table 4.1-1 Item 4	II

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	CTS and ITS both require verification RCS loop T_{avg} is ≥ 540 °F every 30 minutes when $T_{avg}-T_{ref}$ deviation and low T_{avg} alarm are not reset. CTS requires this when the control banks are above step zero that will occur before entering the CTS LCO applicability. ITS require verification only when $k_{eff} \geq 1.0$ consistent with applicability requirements for the ITS LCO.	SR 3.4.2.1	Table 4.1-1 Item 4	II
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS				
	NONE			
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2				
L1	CTS require that the reactor be placed in hot shutdown within 1 hour if the required number of reactor coolant loops are not in operation. Under the same conditions, ITS allow 6 hours to place the plant in Mode 3.	LCO 3.4.4 RA.1	3.1.A.1.g	III
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3				
L1	CTS require 4 RCPs operating prior to the withdrawal of control banks when the reactor is subcritical with $T_{avg} > 350$ °F. ITS LCO 3.4.5.a requires 2 RCPs operating whenever the rod control system is capable of performing withdrawal of any control rods when in Mode 3.	LCO 3.4.5.a	3.1.A.1.b.2	V

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4				
L1	CTS require placing the plant in cold shutdown within 20 hours if fewer than the required minimum number of RCPs and/or RHR pumps are operable and if sufficient equipment is available to perform the plant cooldown. Under the same conditions, ITS LCO 3.4.6, Condition B, allows 24 hours to place the plant in Mode 5.	LCO 3.4.6 Condition B	3.3.A.6.d	III
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED				
L1	ITS require 1 RHR loop operable and in operation and either one additional RHR loop operable or the secondary side water level of at least 2 steam generators (SGs) filled to a level ensuring the tubes are covered. ITS 3.4.7 allows two SGs be used as redundant decay heat removal in Mode 5 when loops are filled.	LCO 3.4.7	3.1.A.1.d	V
L2	ITS add two allowances to Mode 5 decay heat removal requirements. One lets one RHR loop be inoperable 2 hours if the other loop is operable and in operation. The other lets both loops be removed from operation during planned heatup to Mode 4 when one RCS loop is in operation.	LCO 3.4.7 Note 2 LCO 3.4.7 Note 4	None	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED				
L1	ITS adds an allowance to the requirements for decay heat removal in Mode 5 when RCS loops are not filled. Note 2 allows 1 RHR loop to be inoperable 2 hours if the other loop is operable and in operation.	LCO 3.4.8 Note 2	None	V
ITS SPECIFICATION 3.4.9 - PRESSURIZER				
L1	CTS require normal water level be established in the pressurizer prior to reactor criticality. ITS require that pressurizer water level be $\leq 58.3\%$ in Modes 1, 2, and 3.	LCO 3.4.9	3.1.C.4	I
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES				
L1	CTS requires pressurizer safety valves to be operable above CSD. ITS eliminates operability in Mode 4 when LTOP provides overpressure protection.	LCO 3.4.10	3.1.A.2.b	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS set pressurizer safety valve operability requirements, but no RAs if this LCO is not met. ITS require restoration within 15 minutes with one valve inoperable. ITS also require that for two or more valves inoperable, or unmet RAs, the plant must be brought to a Mode in which the requirement does not apply.</p>	<p>LCO 3.4.10 Condition A</p> <p>LCO 3.4.10 Condition B RA A.1</p> <p>LCO 3.4.12</p>	3.1.A.2	IV
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)				
	NONE			
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)				
L1	<p>CTS require a test of the OPS every 24 months. ITS maintain this requirement by requiring a Channel Operational Test on each required PORV every 24 months; however, the Frequency includes an allowance that the initial performance is not required until 12 hours after decreasing RCS temperature to < 319°F.</p>	SR 3.4.12.6	Table 4.1-1 Item 38	II

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE				
L1	CTS specify that there be no non-isolable fault in an RCS component body, pipe wall, vessel wall, or pipe weld. Otherwise, the reactor must be in cold shutdown within 24 hours. ITS keep the requirement for no pressure boundary leakage, but if this requirement is not met, ITS require the plant in Mode 3 in 6 hours and Mode 5 in 36.	LCO 3.4.13.a	3.1.F.4	III
L2	CTS set the limit for unidentified RCS leakage at 1 gpm and for total RCS leakage at 10 gpm. This combination limits RCS identified leakage to between 9 and 10 gpm depending on the amount of unidentified leakage. ITS set the limit for unidentified leakage at 1 gpm and for identified leakage at 10 gpm. ITS do not limit total RCS leakage.	LCO 3.4.13.b LCO 3.4.13.c LCO 3.4.13	3.1.F.2 3.1.F.3 3.1.F.5	V
L3	CTS require that if RCS leakage exceeds 10 gpm, then the reactor shall be placed in hot shutdown within 4 hours and cold shutdown within 28. Under the same conditions, ITS allow 4 hours to reduce leakage. Otherwise, ITS specify the reactor be in Mode 3 within 6 hours and Mode 5 within 36.	LCO 3.4.13 RA A.1 LCO 3.4.13 RA B.1 LCO 3.4.13 RA B.2	3.1.F.5	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L4	<p>CTS limit primary to secondary leakage through the SG tubes to 0.3 gpm/ SG and total leakage through all four SGs to 1.0 gpm. Otherwise, CTS require the plant in hot shutdown in 4 hours and cold shutdown within 28. ITS keep the limits, but with requirements not met, ITS allow 4 hours to reduce leakage. Otherwise, the reactor must be in Mode 3 within 6 hours and Mode 5 within 36.</p>	<p>LCO 3.4.13.d</p> <p>LCO 3.4.13.e</p> <p>LCO 3.4.13 RA A.1</p> <p>LCO 3.4.13 RA B.1</p> <p>LCO 3.4.13 RA B.2</p>	3.1.F.8	III
L5	<p>CTS require that if leakage from two or more tubes in the SGs in any 20-day period is observed or determined, then the reactor must be brought to hot shutdown within 4 hours and cold shutdown within 28. Also, NRC approval must be obtained before resuming operations. If two SG tube leaks attributable to tube denting are observed after the reactor is in cold shutdown, NRC approval must be obtained before resuming operations. These requirements were added to the CTS because of concerns about the SGs in 1979. ITS do not include the requirements related to SG tube leaking.</p>	<p>LCO 3.4.13</p> <p>5.5.8</p>	3.1.F.9	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L6	CTS require primary leakage evaluation 5 days/week. ITS keep the requirement, but reduce Frequency to once/ 72 hours, and the SR is required only during steady state.	SR 3.4.13.1 LCO 3.4.13 LCO 3.4.15 RA A.1 LCO 3.4.15	Table 4.1-3 Item 7	II
L7	CTS require periodic evaluation of RCS leakage using a water inventory balance in Modes 1 through 4. ITS keep this requirement, but the SR need not be done in Mode 3 and 4 until after 12 hours of steady state operation.	3.4.13 SR 3.4.13.1 LCO 3.4.13	Table 4.1-3 Item 7	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE				
L1	<p>CTS require that PIVs be checked periodically for gross leakage. ITS maintain the requirement that PIVs be checked periodically for gross leakage; however, ITS include three Notes that provide needed relaxations from certain testing requirements as follows. Note 1 specifies that PIV leak testing is not required to be performed in Modes 3 and 4 although the SR is required to be met. Note 2 specifies that PIV leak testing is not required to be performed on the PIVs located in the RHR flow path when in shutdown cooling. Note 3 specifies that PIVs actuated during the performance of SR 3.4.14.1 are not required to be tested more than once if a repetitive testing loop cannot be avoided.</p>	<p>SR 3.4.14.1 Note 1</p> <p>SR 3.4.14.1 Note 2</p> <p>SR 3.4.14.1 Note 3</p>	<p>4.5.B.2.c</p> <p>4.5.B.2.d</p>	II
L2	<p>CTS require that PIVs in the injection flow path be checked for gross leakage whenever the reactor is shutdown and depressurized to < 700 psig. ITS relax this requirement by limiting the leakage testing to prior to entering Mode 2 whenever the unit has been in Mode 5 for 7 days or more and only if leakage testing has not been performed in the previous 12 months.</p>	SR 3.4.14.1	4.5.B.2.d	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION				
L1	<p>CTS allow the required leakage detection system sensitive to radioactivity to be out-of-service (OOS) for 48 hours, provided two other systems are available. ITS allow the required containment atmosphere radioactivity monitor to be inoperable for 30 days if grab samples of the containment atmosphere are analyzed once per 24 hours or RCS operational leakage is verified to be within limits by performance of an RCS water inventory balance once per 24 hours. Alternatively, continued operation is also allowed if the containment fan cooler unit (FCU) condensate measuring system is verified to be operable every 30 days, and either grab samples are taken every 24 hours or RCS operational leakage is verified to be within limits by performance of an RCS water inventory balance every 24 hours.</p>	<p>3.4.15 RA B.1</p> <p>3.4.15 RA B.2</p>	3.1.F.10	V
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY				
L1	<p>CTS establish a surveillance Frequency for E Bar determination as semi-annually with a maximum of 30 weeks. ITS also require verification of E Bar every 184 days, but the maximum time between analyses is based on ITS SR 3.0.2 which allows a 25% grace period for a maximum interval of 32.5 weeks.</p>	<p>SR 3.4.16.3</p> <p>SR 3.0.2</p>	<p>Table 4.1-2</p> <p>Item 1</p>	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS set a semi-annual surveillance frequency to determine E Bar. This frequency is modified by a Note specifying that determination will start when gross activity $\geq 10 \mu\text{Ci/cc}$. This allows determination to be deferred until conditions allow meaningful results. ITS also require verifying E Bar every 184 days but have a more precise method to ensure that the sample is taken only when conditions are such that the sample provides accurate indication. SR 3.4.16.3 ensures that appropriate conditions are established by requiring that the E Bar verification can be made only in Mode 1 after a minimum of 2 effective full power days and 20 days of Mode 1 operation have elapsed since the reactor was last subcritical for ≥ 48 hours. A Note to SR 3.4.16.3 allows deferring the SR until such conditions are established. The combination of the sampling restriction in the SR and the allowance in the Note ensure an accurate sample both by allowing and requiring the SR be done when radioactive materials are at equilibrium so the results are representative.</p>	<p>SR 3.4.16.3 SR 3.4.16.3 Note</p>	<p>Table 4.1-2 Item 1 Table 4.1-2 NOTE 3</p>	II
L3	Not used.			
L4	<p>CTS specify that E Bar will be redetermined if the primary coolant gross radioactivity changes by more than $10 \mu\text{Ci/cc}$. ITS SR 3.4.16.3 does not include this requirement.</p>	SR 3.4.16.3	<p>Table 4.1-2 Note 3</p>	II

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.5.1 - ACCUMULATORS				
L1	<p>CTS sets RAs if ECCS systems are not restored to meet requirements within specified completion times when > 350 °F. CTS specify that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown within 4 hours. When an accumulator is inoperable, immediate entry into CTS 3.3.A.5 is required because CTS do not provide any allowable OOS time for an inoperable accumulator. Under the same conditions, ITS allow 1 hour before initiating shutdown; and require that the reactor be in Mode 3 in 6 hours. ITS extend the time allowed to reach Mode 3 when one or more accumulators are not operable from 4 hours to 7 hours.</p>	<p>3.5.1 RA B.1</p> <p>3.5.1 RA C.1</p>	<p>3.3.A.5</p> <p>3.3.A.4.a</p> <p>3.3.A.5.a</p> <p>3.3.A.4</p>	III
L2	<p>CTS do not differentiate between an ECCS accumulator that is inoperable because boron concentration is not within limits and an ECCS accumulator that is inoperable for any other reason. Under the same conditions, ITS extend the allowable OOS time for a single ECCS accumulator that is inoperable because boron concentration is not within required limits from immediate shutdown to 72 hours.</p>	<p>3.5.1 Condition A RA A1</p>	<p>3.3.A.5</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	CTS require that accumulator isolation valves 894A, 894B, 894C, and 894D be open and power supplies de-energized when RCS pressure is > 1000 psig. ITS keep the requirement that accumulator isolation valves 894A, 894B, 894C, and 894D be open whenever the RCS pressure is > 1000 psig, but require that power be removed from each accumulator isolation valve operator only when RCS pressure is \geq 2000 psig.	LCO 3.5.1 SR 3.5.1.5	3.3.A.3.c	I
L4	CTS limit the number of concurrent inoperable ECCS components (Refueling Water Storage Tank, Accumulators, High Head Safety Injection Pumps (HHSI), Residual Heat Removal (RHR) Pumps, Recirculation Pumps) by allowing "any one" of these ECCS components to be inoperable "at any one time." The ITS does not set restrictions on the concurrent inoperability of these components.	LCO 3.5.1 LCO 3.5.2 LCO 3.5.4	3.3.A.4 3.3.A.4.a 3.3.A.4.b 3.3.A.4.c 3.3.A.4.d 3.3.A.4.e 3.3.A.4.f 3.3.A.4.g	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING				
L1	<p>CTS limit concurrent inoperable ECCS (RWST; Accumulators; and HHSI, RHR, and Recirculation Pumps) by allowing "any one" of these to be inoperable "at any one time." Thus, in addition to specific directions in CTS 3.3.A.4.a through CTS 3.3.A.4.g, CTS do not permit concurrent inoperability of these systems. The ITS does not set restrictions on the concurrent inoperability of these components.</p>	LCO 3.5.1 LCO 3.5.2 LCO 3.5.4	3.3.A.4 3.3.A.4.a 3.3.A.4.b 3.3.A.4.c 3.3.A.4.d 3.3.A.4.e 3.3.A.4.f 3.3.A.4.g	V
L2	Superceded by Amendment 196.			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	ITS have a new allowance that both ECCS injection flow paths may be isolated when in Mode 3 by closing the isolation valves for 2 hours to test pressure isolation valves. CTS include no such allowance. This change is needed because ITS include a new requirement that pressure isolation valve testing must be performed within 24 hours following valve actuation due to automatic or manual action or if there is flow through the valve.	3.5.2 3.5.1 SR 3.4.14.1 LCO 3.5.2, Note 1	3.3.A.5 3.3.A.5.a	IV
L4	ITS LCO 3.5.2, Note 2, provides a new allowance that operation in Mode 3 with ECCS pumps declared inoperable pursuant to LCO 3.4.12, is allowed for up to 4 hours or until the temperature of all RCS cold legs exceeds 375°F, whichever comes first. CTS includes no such allowance.	LCO 3.5.2, Note 2 LCO 3.4.12	3.3.A.5 3.3.A.5.a 3.3.A.5.b	V
L5	CTS require verification that the stops on the HHSI valves are correctly set at a convenient outage if the position of the stops have not been verified in the preceding three months. ITS require verification that the stops on the HHSI valves are correctly set at a 24 month Frequency.	SR 3.5.2.6	4.5.A.1.d 4.5.A.1.a	II
L6	CTS set Required Actions if ECCS systems are not restored to requirements within completion times when > 350°F. CTS also specify that, if the reactor is critical when requirements are not met, then it shall be in hot shutdown within 4 hours. Under the same conditions, ITS require the reactor be in Mode 3 in 6 hours.	3.5.2 RA B.1	3.3.A.5 3.3.A.5.a	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN				
L1	CTS require cold shutdown if an RHR subsystem is not restored to operable within 1 hour when in Mode 4. ITS keep the requirement to place the plant in Mode 5 if a recirculation subsystem is not restored to operable within 1 hour. However, if a required RHR subsystem is inoperable in Mode 4, ITS require immediate action to restore it to operable, but the requirement to place the plant in Mode 5 is eliminated.	LCO 3.5.3 RA B.1 LCO 3.5.3 RA A.1	3.3.A.2	IV
L2	CTS require the plant be in cold shutdown within 20 hours if an RHR subsystem and/or a recirculation subsystem are not restored to operable within 1 hour when in Mode 4 . ITS keep the requirement to place the plant in Mode 5 if a recirculation subsystem is not restored to Operable within 1 hour; however, ITS LCO 3.5.3, Required Action C.1, extends the time allowed to reach Mode 5 from 20 hours to 24 hours.	3.5.3 LCO 3.5.3 RA C.1	3.3.A.2	III, IV
L3	CTS do not differentiate between surveillance test requirements for Operability in Modes 1, 2 and 3, when automatic ECCS initiation is required, and requirements for Operability in Mode 4, when automatic ECCS initiation is not required. ITS establishes surveillance test requirements for operability in Mode 4 which recognize that manual alignment to restore the ECCS function of RHR when in Mode 4 is acceptable. Specifically, CTS 4.5.A.1.a and b are not required by ITS SR 3.5.3.1 for operability of ECCS RHR in Mode 4.	3.5.3 SR 3.5.3.1	4.5.A 4.5.B 4.5.A.1.a 4.5.A.1.b	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)				
L1	<p>CTS require the reactor be in cold shutdown within 21 hours if RWST required volume or boron concentration limits are not met whenever T_{avg} is > 200°F. CTS require the reactor be in hot shutdown within 4 hours and cold shutdown within 28 if RWST required volume or boron concentration limits are not met whenever T_{avg} is > 350°F and the reactor is critical. CTS require that RCS pressure and temperature not be increased and a plant cooldown be initiated within 48 hours if RWST required volume or boron concentration limits are not met whenever T_{avg} is > 350°F and the reactor is not critical. Under the same conditions, ITS , require the reactor be in Mode 3 in 6 hours and Mode 5 in 36.</p>	<p>3.5.4 3.5.4 RA C.1 3.5.4 RA C.2</p>	<p>3.3.A.2 3.3.A.5.a 3.3.A.5.b</p>	III, IV
L2	<p>CTS require an RWST be restored within one hour if it is inoperable either because level or boron concentration are out of limit. Under the same conditions, ITS require that an RWST be restored within one hour if it is inoperable because level is out of limit, but allows 8 hours to restore an RWST that is inoperable because boron concentration is out of limit.</p>	<p>3.5.4 RA B1 3.5.4 RA A.1</p>	<p>3.3.A.2 3.3.A.5.a</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.6 - CONTAINMENT SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.6.1 - CONTAINMENT				
	NONE			
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS				
L1	CTS does not establish any explicit allowance for containment ingress or egress through an air lock with an inoperable door; thus, ingress or egress through an air lock with an inoperable inner door results in a breach of containment and CTS 3.6.A.3 applies. Under the same conditions, ITS specifies that entry and exit are permissible to repair affected air lock components. In addition, if both air locks have inoperable doors, ITS specifies that entry and exit for any reason is permissible for seven days beginning when the second air lock becomes inoperable.	3.6.2 Action Note 1 3.6.2 RA A1 NOTE 2	1.10 3.6.A 3.6.A.3	IV

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	CTS specifies that, with requirements unmet, containment integrity shall be restored within one hour. ITS 3.6.2 differentiates between Conditions that do not result in breach of containment integrity and Conditions that can exceed overall containment leakage rate limit established in LCO 3.6.1.	3.6.2 Condition A 3.6.2 Condition B 3.6.2 Action C	3.6.A.3	III, IV
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES				
L1	Superseded by CTS Amendment 195.			
L2	CTS requires that containment integrity be restored within one hour when containment integrity requirements are unmet. According to 10 CFR 50, Appendix A, Criterion 56, containment integrity requires two automatic isolation valves with the option of allowing one closed isolation valve for either or both of the automatic isolation valves such that the design can tolerate a single failure. Thus, when one or both containment isolation valves in a penetration flow path are inoperable, CTS requires that a closed manual valve or equivalent be substituted for the inoperable valve within one hour if containment integrity is lost. ITS keeps the same requirement but differentiates between loss of single failure tolerance and loss of function in the determination of an acceptable OOS time.	3.6.3 RA A.1 3.6.3 RA B.1 3.6.3 RA C.1	1.10 3.6.A.3 3.6.D	III

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS allow separates condition entry for different penetrations as long as only one penetration has a valve that is inoperable and not closed or isolated at one time. If two penetrations are inoperable at the same time, the one hour permitted to close or isolate an inoperable valve in CTS does not apply, and shutdown is initiated immediately. ITS specifies that separate condition entry is allowed for each penetration flow path.</p>	<p>3.6.3 ACTIONS NOTE 2</p>	<p>1.10.4 3.6.A 3.6.D</p>	IV
L4	<p>CTS specifies that the compensatory action for an inoperable containment isolation valve includes isolating a penetration flow path with a closed manual valve or flange that meets the same design criteria as the isolation valve. ITS also allows isolating a penetration flow path with a check valve with flow secured.</p>	<p>3.6.3 RA A.1</p>	<p>1.10.4</p>	IV
L5	<p>CTS specifies that the compensatory action for an inoperable CIV includes isolating a penetration flow path with a closed manual valve or flange that meets the same design criteria as the isolation valve. ITS does not specifically require that the device used to isolate a containment penetration meet the same design criteria as the isolation valve. However, there is an implied requirement that the device be able to satisfy the containment isolation function.</p>	<p>3.6.3 RAs</p>	<p>1.10.4</p>	IV

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L6	CTS requires a check of the automatic actuation of the containment isolation system every 24 months. ITS maintains this with a requirement to verify that each automatic containment isolation valve “that is not locked, sealed or otherwise secured in position,” actuates to the isolation position on an actual or simulated actuation signal.	SR 3.6.3.6	TABLE 4.1-3 ITEM 5	II
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE				
L1	CTS requires that if the containment internal pressure exceeds specified limits, then the condition must be corrected or the reactor shut down; however, no Completion Time is specified. Therefore, in accordance with CTS 3.0, the time is assumed to be zero and action is initiated without delay. Under the same conditions, ITS allow one hour for restoration of containment pressure before a reactor shutdown is required.	3.6.4 RA A.1	3.0 3.6.B	III
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY (CS) SYSTEM AND CONTAINMENT FAN COOLER SYSTEM				
L1	CTS provides an AOT of 24 hours for one inoperable CS pump and establishes an AOT of 24 hours for any valve required for the functioning of the CS system provided all valves in the system that provide the duplicate function are Operable. Under the same conditions, ITS establishes an AOT of 72 hours for one inoperable containment spray train.	3.6.6 RA A.1	3.3.B.2.b 3.3.B.2.c	III
L2	CTS provides AOTs for FCUs, but there is no AOT when more than one FCU is inoperable. Therefore, if more than one FCU is inoperable, then a plant shutdown must be initiated. ITS provides an AOT of 72 hours if two containment fan cooler trains are inoperable.	3.6.6 Condition D	3.3.B.2	III
L3	CTS establishes the Actions required if either CS and/or containment fan cooler trains are not restored to meet CTS requirements within specified completion times. CTS specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown within 4 hours and cold shutdown within the following 24. Under the same conditions, ITS require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours when CS requirements are not met and that the reactor be in Mode 3 in 6 hours and in Mode 5 in 36 hours when FCU requirements are not met. (See DOC L10/was M2 below)	3.6.6 RA B.1 3.6.6 RA B.2 3.6.6 RA E.1 3.6.6 RA E.2	3.3.B.3 3.3.B.3.a	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L4	<p>CTS requires that the spray nozzles be checked for proper functioning at least every five years. ITS requires verification every ten years that each spray nozzle is unobstructed.</p>	SR 3.6.6.9	4.5.2.b	II
L5	<p>CTS provides AOTs for FCUs as follows:</p> <ul style="list-style-type: none"> a. FCU 32, 34, or 35, or the flow path for FCU 32, 34, or 35 may be OOS for 24 hours, provided both CS pumps are operable; or, b. FCU 31 or 33, or the flow path for FCU 31 or 33, may be OOS for 7 days, provided both CS pumps are Operable. <p>This set of Actions will allow only one of the five FCUs to be inoperable at one time and then only if no CS train is inoperable.</p> <p>ITS establishes requirements for three Fan Cooler System trains where FCU 31 and 33 are identified as Containment Fan Cooler train 5A, FCU 32 and 34 are identified as Containment Fan Cooler train 2A/3A, and FCU 35 is identified as Containment Fan Cooler train 6A.</p> <p>ITS allows any one train to be inoperable for 7 days and any two trains to be inoperable for 72 hours, and entry into LCO 3.0.3 if any combination of three or more trains of CS or FCUs are inoperable.</p>	<p>LCO 3.6.6 RA C.1</p> <p>LCO 3.6.6 RA D.1</p> <p>LCO 3.6.6 RA F.1</p>	3.3.B.2.a	III, IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L6	CTS specifies requirements for a functional test of the CS system and establishes the acceptance criteria for this test as “the tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily.” ITS keeps the requirement to demonstrate Operability, but the statement that appropriate verification of system performance is limited to visual observations that all components have operated is not needed.	SR 3.6.6.5 SR 3.6.6.6	4.5.A.2.a 4.5.A.2.c	II
L7	CTS requires a functional test of the CS system and specifies that “operation of the system is initiated by tripping the normal actuation instrumentation.” ITS maintains the requirement for a functional test, but the test may be initiated by either an actual or simulated signal.	SR 3.6.6.5 SR 3.6.6.6	4.5.A.2.a	II
L8	CTS allows any one of the five FCUs or CS pumps to be inoperable at any one time and does not permit any AOT if redundant trains of CS or FCUs are inoperable. ITS allows an AOT even if redundant trains of CS or FCUs are inoperable as long as the combination of inoperable FCUs and inoperable CS trains do not result in less than the minimum functional capability assumed in the accident analysis. ITS establishes requirements for three Fan Cooler System trains where FCU 31 and 33 are identified as Containment Fan Cooler train 5A, FCU 32 and 34 are identified as Containment Fan Cooler train 2A/3A, and FCU 35 is identified as Containment Fan Cooler train 6A. ITS allow any one train to be inoperable for 7 days and any two trains to be inoperable for 72 hours, and entry into LCO 3.0.3 if any combination of three or more trains of CS and FCUs are inoperable.	3.6.6 RA C.1 3.6.6 RA D.1 3.6.6 RA F.1	3.3.B.2 3.3.B.2.a 3.3.B.2.b 3.3.B.2.c	III, IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L9	CTS specifies requirements for a functional test of the CS System. ITS keeps the requirement to demonstrate Operability of the CS system; however, ITS explicitly excludes valves that are “locked, sealed, or otherwise secured in position.”	SR 3.6.6.5	4.5.A.2.a	II
L10 (was M.2)	CTS 3.3.B.3 establishes the Actions required if either containment spray and/or containment fan cooler trains are not restored to meet CTS requirements within specified completion times CTS 3.3.B.2. CTS 3.3.B.3.a specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown (Mode 3) within 4 hours and cold shutdown (Mode 5) within the following 24 hours. However, if the reactor is subcritical when requirements are not met, CTS 3.3.B.3.b requires only that reactor coolant system temperature and pressure not be increased more than 25°F and 100 psi, respectively, over existing values with the requirement to proceed to cold shutdown (Mode 5) deferred by 48 hours. The CTS markup shows CTS 3.3.B.3.b as being deleted. The deletion is justified as a more restrictive change and states that under the same condition stated above, ITS 3.6.6 Required Actions B.1 and B.2 and/or Required Actions E.1 and E.2, require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours (Required Action B.2, and E.2) regardless of the status of the unit when the condition is identified. The allowance of 48 hours provided in CTS 3.3.B.3.b is deleted. This justification is not entirely correct. The statement implies that if either a spray train and/or one or two containment fan coolers is determined to be inoperable while in Mode 3, then an immediate shutdown is commenced such that Mode	3.6.6 Actions	3.3.B.3 3.3.B.3.a 3.3.B.3.b	III, IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L10 (was M.2) (continued)	5 is reached within 84 hours. The CTS for this type of condition would allow 24 hours to restore the systems to Operable status before entering CTS 3.3.B.3 where an additional 48 hours would be allowed before shutting down to Mode 5. In the ITS for this condition, ITS Actions A, C, and/or D would be entered first. If the systems could not be restored to Operable status within the specified Completion Time of these Actions, then ITS 3.6.6 Action B and/or E would be entered. Under this scenario the changes associated with CTS 3.3.B.3.b would be an Administrative change for the Containment Spray System (CTS: 24 + 48 = 72 hours, to ITS of 72 hours) and a Less Restrictive (L) change for one containment fan cooler train inoperable (CTS 24 + 48 = 72 hours to ITS 7 days). The staff finds this overall change as a less Restrictive that is acceptable.			
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM				
L1	CTS establishes requirements for the Spray Additive System. CTS specifies that any valve required for the functioning of the system during and following an accident may be inoperable provided it is restored within 24 hours and all valves in the system that provide the duplicate function are Operable. If the requirements of CTS 3.3.B.1.a are not met for any other reason, then CTS 3.3.B.3 requires initiation of a plant shutdown because no other AOT is specified. Under the same conditions, ITS provides an AOT of 72 hours for an inoperable Spray Additive System before a reactor shutdown is required. See DOC A7 (was M2) in A-Table for additional justifications with regards to this change.	3.6.7 RA A.1	3.3.B.1.a 3.3.B.2.c 3.3.B.3	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS establishes the Actions required if either CS and/or containment fan cooler trains are not restored to meet CTS requirements within specified completion times. CTS specifies that, if the reactor is critical when requirements are not met, then the reactor must be in hot shutdown within 4 hours and cold shutdown within the following 24 hours. Under the same conditions, ITS require that the reactor be in Mode 3 in 6 hours and in Mode 5 in 84 hours. See DOCA7 (was M2) in A-Table for additional justifications with regard to this change.</p>	<p>3.6.7 RA B.1 3.6.7 RA B.2</p>	<p>3.3.B.3 3.3.B.3.a</p>	III
L3	<p>CTS requires verification that the NaOH concentration in the spray additive tank is within required limits every month with a maximum time between analyses of 45 days. ITS maintains the requirement that the NaOH concentration in the spray additive tank be within required limits, but the surveillance frequency is extended to 184 days with the maximum time between analyses determined by ITS SR 3.0.2.</p>	<p>SR 3.0.2 SR 3.6.7.3</p>	<p>3.3.B.1.a Table 4.1-2 Item 3</p>	II
L4	<p>CTS specifies that each spray additive valve be cycled by operator action with the pumps shut down at least once per 24 months. ITS requires verification every 24 months that each automatic valve in the Spray Additive System flow path actuates to its correct position. ITS explicitly excludes valves that are “locked, sealed, or otherwise secured in position.”</p>	SR 3.6.7.4	<p>4.5.A.2.a 4.5.B.2.a</p>	II
L5	<p>CTS requires a functional test of the CS system and specifies that “operation of the system is initiated by tripping the normal actuation instrumentation.” ITS maintains the requirement for a functional test of the Spray Additive System, but the test may be initiated by either an actual or simulated signal.</p>	SR 3.6.7.4	4.5.A.2.a	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L6	CTS specifies requirements for a functional test of the spray additive system and establishes the acceptance criteria for this test, as “the tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily.” ITS keeps the requirement for a functional test, but not the statement that appropriate verification of system performance is limited to visual observations that all components have operated.	SR 3.6.7.4	4.5.A.2.a 4.5.A.2.c	II
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS				
L1	CTS requires that two independent hydrogen recombiner systems be operable when reactor $T_{avg} > 350$ °F. ITS keeps the requirement that two independent hydrogen recombiner systems be Operable, but this requirement applies only in Modes 1 and 2. In conjunction with this change, the actions for one or more inoperable hydrogen recombiners are changed to require only that the plant be placed in Mode 3 rather than reduce reactor T_{avg} to < 350 °F.	LCO 3.6.8	3.3.I.1	I, IV
L2	CTS requires a periodic resistance to ground check of the hydrogen recombiners and requires that this test be performed after CTS 4.5.7.a.1 and CTS 4.5.7.a.2.b. ITS SR 3.6.8.3 keeps the requirement for a periodic resistance to ground check, but does not require performing this test after the functional test (ITS SR 3.6.8.1) and after the inspections (ITS SR 3.6.8.2).	SR 3.6.8.1 SR 3.6.8.2 SR 3.6.8.3	4.5.7.a.1 4.5.7.a.2.b 4.5.7.a.2.c	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.6.9 - IVSW SYSTEM				
L1	<p>CTS provides an AOT if one IVSW System header is inoperable or if one IVSW automatic actuation valve is inoperable, but no AOT is provided for IVSW inoperability for any other reason. Thus, CTS would require immediate shutdown under these conditions. ITS keeps a 7 day AOT if one IVSW system header is inoperable or if one IVSW automatic actuation valve is inoperable; however, ITS 3.6.9, Condition B and the associated RA, establish a 24 hour AOT if the IVSW is inoperable for any reason other than Condition A.</p>	<p>3.6.9 Condition B RA</p> <p>3.6.9 Condition A</p>	<p>3.0 3.3.C.2</p>	<p>III</p>
ITS SPECIFICATION 3.6.10 - WC&PP SYSTEM				
L1	<p>CTS establishes the limit that only one of the four WC&PP zones may be inoperable at one time, and no compensatory action is provided to restore safety function and allow continued operation. CTS requires that the reactor be placed in cold shutdown promptly if all aspects of WC&PP Operability are not restored within the AOT. ITS specifies that separate condition entry be allowed for each component supplied by WC&PP. In addition, ITS specifies compensatory action for one or more components supplied by WC&PPS not within the pressure limit.</p>	<p>3.6.10, Actions, Note 1</p> <p>3.6.10, Condition A</p> <p>3.6.10, Condition B</p>	<p>3.3.D.2.a 3.3.D.3</p>	<p>IV</p>

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.7 - PLANT SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)				
L1	CTS requires that the reactor be in cold shutdown within 36 hours if minimum requirements for MSSV relieving capacity cannot be met. Under the same conditions, ITS requires that the reactor be in Mode 4 within 12 hours.	3.7.1	3.4.A.1.b	III, IV
L2	CTS requires verification of the MSSV lift setpoints every 24 months. ITS requires verification of the MSSV lift setpoints at a Frequency established by the Inservice Test Program in accordance with ASME Code, Section XI, as stipulated in ANSI/ASME OM-1-1987.	3.7.1	Table 4.1-3	III
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)				
L.1	CTS require operability of the MSIVs but does not include explicit requirements for the Operability of the MSCVs. Therefore, an inoperable MSCV requires an immediate plant shutdown because the MSCVs are described in the FSAR and the IP3 safety analysis assumes the Operability of the MSCVs to mitigate the failure of one or more MSIVs during a steam line break upstream of an MSIV. ITS include requirements for the Operability of both 4 MSIVs and 4 MSCVs and provides AOTs for one or more inoperable MSCVs.	3.7.2	3.4.A.5	III, IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	CTS establishes the Applicability for the MSIVs as whenever the reactor is heated above 350 °F. ITS relax this Applicability by requiring that the MSIVs and MSCVs to be Operable in Mode 1, and Operable in Mode 2 and 3 except when all MSIVs are closed.	3.7.2	3.4.A	I
ITS SPECIFICATION 3.7.3 - MAIN BOILER FEEDPUMP DISCHARGE VALVES (MBFPDVs), MAIN FEEDWATER REGULATION VALVES (MBFRVs), AND MBFRV LOW FLOW BYPASS VALVES				
	NONE			
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADVs)				
	NONE			
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM				
L1	CTS specify Actions if one or more AFW pumps are inoperable; however, CTS does not specify any allowance for the redundancy in the steam supply to the steam driven AFW pump. Therefore, if either of the steam supplies to the steam driven AFW pump are not Operable, then the steam driven AFW pump is not Operable and restoration of the pump or initiation of a plant shutdown is required within 72 hours. Under the same conditions, ITS allows 7 days to restore the redundant steam supply before initiation of plant shutdown is required.	3.7.5	3.4.C	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS require each AFW pump be started periodically, specify the test acceptance criteria that each pump starts and reaches the required developed head and requires verification that each AFW pump will start as designated automatically when SG pressure is ≥ 600 psig. The ITS allowance permitting deferral of SRs is an explicit recognition that the SRs cannot be initiated until minimum plant conditions are established and that some time is required to perform this test once conditions are established.</p>	3.7.5	<p>4.8.1.a</p> <p>4.8.2</p> <p>4.8.3.b</p>	II
L3	<p>CTS require verification that each AFW pump establish full flow to each SG every 24 months. ITS keep the requirement to verify the developed head of each AFW pump at the flow test point is \geq the required developed head at a frequency specified by the Inservice Test Program, but not the requirement to verify full flow to each SG every 24 months.</p>	3.7.5 SR 3.7.5.2	4.8.1.a	II
L4 (was A8)	<p>CTS require that the verification that each AFW pump will start automatically upon receipt of an AFW actuation test signal. ITS maintain this requirement with the allowance that the test may be initiated by either an actual or simulated actuation signal.</p>	3.7.5.2	4.8.3.b	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK				
L1	<p>CTS 3.4.A.3 and 3.4.A.7 require that the CST and CW are Operable in Modes 1, 2, and 3. When either the CST or CW or both are not Operable, CTS 3.4.B allows 48 hours to restore both water supplies to Operable before a plant shutdown is required. Under the same conditions, ITS 3.7.6, CST, and ITS 3.7.7, CW, will not allow both the CST and CW to be inoperable at the same time; however, ITS 3.7.6, RA A.2 and ITS 3.7.7. RA A.2 are in part, less restrictive since the ITS extends the time that either the CST or CW but not both can be inoperable from 48 hours to 7 days.</p>	<p>3.7.6 RA A.2</p> <p>3.7.7 RA A.2</p>	<p>3.4.A.3</p> <p>3.4.A.7</p> <p>3.4.B</p>	III
L2	<p>The CTS Bases for CTS 3.4.A(4) include a requirement that is not part of CTS 3.4.A(4). Specifically, the Bases require that the CST piping and valves that are governed by Specification include the two QA Category I 100% capacity breather valves installed on the dome of the CST. These valves ensure the CST pressure is within design limits by providing both pressure relieving and vacuum break capability. Per specification 3.4.B, if one breather valve is inoperable, it must be returned to operability within 48 hours or the reactor must be shut down and cooled to below 350 degrees F using normal operating procedures. ITS 3.7.6 does not include a specific requirement for these valves, but the Bases specify that CST venting and pressure relief capability are required for the CST to perform both its normal and emergency functions. Eliminating the requirement for reactor shutdown within 48 hours is acceptable since one breather valve can do the required safety function and the breather valves are reliable. In addition, the IP3 corrective action program will ensure that an inoperable breather valve is restored to service if it is determined to be inoperable.</p>	3.7.6	<p>3.4.A(4)</p> <p>3.4.B</p>	IV, V

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.7 - CITY WATER (CW)				
L1	CTS 3.4.A.3 and 3.4.A.7 require the CST and CW to be Operable in Modes 1-3. When either or both are not Operable, CTS 3.4.B allows 48 hours to restore both. ITS 3.7.6 and 3.7.7 will not allow both to be inoperable at the same time. However, ITS 3.7.6 RA A.2 and 3.7.7 RA A.2 extend the time that either CST or CW can be inoperable.	3.7.6 RA A.2 3.7.7 RA A.2	3.4.B	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.8 - COMPONENT COOLING WATER (CCW) SYSTEM				
L1	<p>CTS 3.3.E.2, 3.3.E.2.a, and 3.3.E.2.c allow either one CCW pump or one CCW HX to be inoperable with an AOT of 24 hours for a pump and 48 hours for a HX or other passive component. Although normally CCW operates cross connected, ITS LCO 3.7.8 sets requirements for two CCW loops with a loop consisting of one pump and one HX. In connection with this change, ITS LCO 3.7.8 will allow both a pump and/or the HX in the same loop to be inoperable at the same time and will extend the AOT for a pump and/or HX to 72 hours.</p>	3.7.8	3.3.E.2 3.3.E.2.a 3.3.E.2.c	III
L2	<p>CTS 3.3.E.3.a specifies that if requirements for CCW are unmet and CCW is not restored to Operable within specified restoration time, then the plant must be in hot shutdown within 4 hours and in cold shutdown within the following 24 hours. Under the same conditions, ITS LCO 3.7.8 RAs B.1 and B.2 allow 6 hours to reach Mode 3 and 36 hours to reach Mode 5.</p>	LCO 3.7.8 RA B.1 RA B.2	3.3.E.1.b 3.3.E.3.b 3.3.E.3.a	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS 3.3.E.1.b requires that two auxiliary component cooling pumps, one per each recirculation pump, together with their associated piping and valve, are operable; and CTS 3.3.E.2.b specifies that two auxiliary component cooling pumps serving the same recirculation pump may be OOS provided at least one is restored to operable within 24 hours and at least one auxiliary component cooling pump serving the other recirculation pump is operable. ITS LCOs 3.5.2 and 3.7.8 recognize that the auxiliary component cooling pumps covered by CTS 3.3.E.1.b and 3.3.E.2.b are support systems for the Containment Recirculation pumps which are governed by ITS LCO 3.5.2. Therefore, the Bases for ITS LCO 3.5.2 specifies that Containment Recirculation pump operability requires the functional availability of an associated auxiliary component cooling water pump and CTS 3.3.E.1.b and 3.3.E.2.b are deleted. Therefore, if at least one auxiliary component cooling pump capable of supporting each containment recirculation pump is not operable, the supported Containment recirculation pump is not operable and the requirements of ITS 3.5.2 ensure the appropriate requirements apply.</p>	3.5.2	3.7.8 3.3.E.1.b 3.3.E.2.b	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.9 - SERVICE WATER (SW) SYSTEM				
L1	<p>CTS requires 3 SW pumps on the SW System header designated as essential because 2 pumps are required in the accident analysis. CTS requires 2 SW pumps on the SW System header designated as nonessential because 1 pump is required in the accident analysis. If one or more required pumps on either or both headers are inoperable, CTS allows 12 hours for restoration. Under the same conditions, ITS provides a less restrictive AOT when an inoperable essential and/or nonessential SW pump results in a loss of redundancy, but functional capability is maintained.</p>	3.7.9	3.3.F.1 3.3.F.2	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.10 - ULTIMATE HEAT SINK (UHS)				
	NONE			
ITS SPECIFICATION 3.7.11 - CONTROL ROOM VENTILATION SYSTEM (CRVS)				
	NONE			
ITS SPECIFICATION 3.7.12 - CONTROL ROOM AIR CONDITIONING SYSTEM (CRACS)				
	NONE			
ITS SPECIFICATION 3.7.13 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS)				
L1	CTS require that the FSBEVS fan must be operated for 15 minutes every month. CTS, therefore, require testing of the FSBEVS even when the FSBEVS is not required to be operable. ITS maintains the requirement to test FSBEVS whenever it is required to be operable (i.e., when handling irradiated fuel in the fuel storage building), but not the requirement to perform this test every 31 days whenever there is irradiated fuel in the spent fuel pit.	SR 3.7.13.2	4.5.6.a	II
ITS SPECIFICATION 3.7.14 - SPENT FUEL PIT WATER LEVEL				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.7.15 - SPENT FUEL PIT BORON CONCENTRATION				
L1	CTS specify the Applicability of requirements for spent fuel pit boron concentration as during periods of spent fuel movement in the spent fuel pit. CTS also requires monthly verification of boron concentration “when fuel stored” in the spent fuel pit. ITS specifies that spent fuel pit boron concentration limits must be met “When fuel assemblies are stored in the fuel storage pit and a spent fuel pit verification has not been performed since the last movement of fuel assemblies in the fuel storage pit.	3.7.15 Applicability	3.8.C.3 Table 4.1-2 5.4.3	I
ITS SPECIFICATION 3.7.16 - SPENT FUEL ASSEMBLY STORAGE				
	None			
ITS SPECIFICATION 3.7.17 - SECONDARY SPECIFIC ACTIVITY				
L1	CTS require checking secondary system gross activity at least 3 times every 7 days with a maximum time between secondary gross activity analyses of 3 days. ITS does not have any requirements for periodic verification of secondary side gross activity.	3.7.17	Tale 4.1-2	II

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING				
L1	<p>CTS limit concurrent inoperable power sources by limiting RAs for inoperable DGs, offsite sources, and batteries to allow any one of these power supplies to be inoperable at one time. Thus, CTS do not permit a battery to be inoperable when either a DG or an offsite source is inoperable. ITS are less restrictive since there are no direct restrictions on DC power subsystems based on operability of DGs or offsite sources nor are there restrictions on DGs or offsite sources based on operability of DC power subsystems. In addition, CTS and ITS both require immediate shutdown initiation if two batteries and chargers are inoperable. Thus, the maximum effect of eliminating the CTS restriction is the potential that ITS would delay shutdown initiation two hours. In addition, ITS would allow more time to initiate shutdown only in very infrequent combinations of inoperabilities. Thus, eliminating the CTS restriction has no significant consequence.</p>	<p>3.8.1 3.8.4</p>	<p>3.7.B 3.7.B.1 3.7.B.2</p>	<p>IV</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
- II - Relaxation of Surveillance Requirement V - Relaxation of LCO
- III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS require that a component with an inoperable offsite power source or DG power source be declared inoperable immediately if its redundant component is inoperable for any reason other than inoperable power source. CTS also say that if a DG is inoperable, then the ESF associated with the remaining DG buses must be operable. This ensures that failure of the remaining operable power source does not cause loss of safety function since the redundant component is inoperable for reasons other than inoperable power supply. ITS have the same requirement to declare required features supported by the inoperable AC source inoperable when the required redundant feature is inoperable, but ITS delay implementing this requirement 24 hours with one inoperable offsite circuit, 4 hours with one inoperable DG, and 12 hours with both offsite circuits inoperable to allow time for evaluation and repair.</p>	<p>3.8.1 RA A.3</p> <p>3.8.1 RA B.2</p> <p>3.8.1 RA C.1</p>	<p>3.7.G</p> <p>3.7.B.1</p>	III
L3	Not used; superseded by Amendment 187.			
L4	<p>CTS allow either the 138 kV or the 13.8 kV offsite source to be inoperable for 48 hours provided the three DGs are operable. CTS also specify that this AOT may be extended beyond 48 hours with NRC approval. Under the same conditions, ITS establish an AOT of 72 hours for one inoperable offsite source and eliminate the statement that the AOT may be extended with NRC approval. An AOT consistent with Regulatory Guide 1.93 is appropriate. This AOT takes into account the capacity and capability of the remaining AC sources, a reasonable repair time, and the low probability of a DBA occurring during this period. This change has no safety effect.</p>	<p>3.8.1 RA A.4</p>	<p>3.7.B.2</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L5	<p>CTS specify RAs and CTs for one inoperable DG or offsite source and include the restriction that the listed required actions "allow any one" of these power supplies to be inoperable at any one time. Thus, if more than one DG or offsite source is inoperable or if a DG and offsite source are inoperable concurrently, then CTS require immediate shutdown initiation. Under the same conditions, ITS allow 24 hours to restore at least one offsite source if both are inoperable; 12 hours to restore an offsite source or a DG if one offsite source and one DG are inoperable; and, two hours to restore at least two DGs if two or more DGs are inoperable. Thus, AOTs consistent with the Regulatory Guide 1.93 recommendations are appropriate. These AOTs take into account capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period. Thus, these changes have no significant adverse safety effect.</p>	<p>3.8.1 RA C.2</p> <p>3.8.1 RA D.1</p> <p>3.8.1 RA D.2</p> <p>3.8.1 RA E.1</p>	<p>3.7.B.1</p> <p>3.7.B.2</p> <p>3.0</p>	III
L6	<p>CTS require testing of time delay relays used to sequence ESF components on safeguards buses. ITS keep this requirement, but add that load timers need not be operable if associated equipment has automatic initiation disabled. If a timer fails to start a load or starts it later than assumed in the analysis, then the load is inoperable. If a timer starts the load outside the design interval, then the DG and offsite source are inoperable since start overlap may cause an offsite source to exceed voltage or current limits or a DG to exceed voltage, current, or frequency limits. When a timer is inoperable, it is conservative to disable automatic initiation of that component rather than declare the DG inoperable since: the potential for adverse effect on the DG by simultaneous starts is avoided; other loads powered from the train are available ; and, the load with the inoperable timer remains available for manual start. Further, RAs and CTs for loads with automatic initiation disabled ensure that the affected functions affected are restored. This has no significant adverse safety effect.</p>	<p>3.8.1.11</p> <p>SR 3.8.1.11 Note</p>	<p>4.5.A.1.a Footnote*</p> <p>4.6.A.3 Footnote*</p>	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L7	<p>CTS require verification every 24 months of ability to respond to a DBA with concurrent LOOP. As specified in CTS, this test is conducted by simulating loss of all normal AC station service power supplies in conjunction with a simulated SI signal. ITS keep this requirement, but allow the SR to be conducted with only one train at a time or with two or three trains concurrently. ITS require that this test not be conducted in Modes 1, 2, 3, or 4. In addition, ITS require simultaneous start of all three DGs at least once every 10 years if the test is done with only one DG at a time during the 10-year interval. Thus, an individual test for each train will verify Plant response. Allowing the LOOP/LOCA test to be conducted with all 3 trains concurrently is current requirement and practice. The testing of individual trains is consistent with: operability of the redundant counterpart to the inoperable required feature and the capacity and capability of remaining AC sources, a reasonable time for repairs, and the low probability of a DBA during this period. This change does not have a significant adverse safety effect.</p>	<p>SR 3.8.1.12 Note 3</p> <p>SR 3.8.1.12 Note 2</p> <p>SR 3.8.1.13</p> <p>SR 3.8.1.12</p>	4.6.A.3	II
L8	<p>CTS require weekly verification of the fuel inventory for DGs 31, 32, and 33. According to the FSAR, DG fuel inventory includes DG day tanks, onsite underground fuel oil storage tanks, and offsite fuel oil reserve. ITS requirements for the periodic verification of DG fuel oil inventory in the onsite storage tanks and the offsite fuel oil reserve are addressed in ITS 3.8.3. ITS requirements for the periodic verification of DG fuel oil inventory in the DG day tanks are addressed in ITS SR 3.8.1.4. ITS SR 3.8.1.4 keeps the requirement for periodic verification of DG fuel inventory in the day tanks except that the required frequency is extended from weekly to once per 31 days. This change has no significant adverse safety effect.</p>	<p>3.8.1</p> <p>3.8.3</p> <p>3.8.1.4</p> <p>3.8.1.6</p>	Table 4.1-3 Item 8	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L9	<p>CTS require that the 6.9 kV bus tie breaker control switches 1-5, 2-5, 3-6, and 4-6 be in the "pull-out" position when the 13.8 kV offsite source is being used to feed 6.9 kV buses 5 and 6. ITS maintain the requirement to disable automatic transfer of 6.9 kV buses 1, 2, 3, and 4 to the offsite source if the 13.8 kV offsite source is supplying 6.9 kV bus 5 or 6 except that ITS require this restriction only if the Unit Auxiliary Transformer is supplying 6.9 kV bus 1, 2, 3 or 4. This change will not permit the plant to be placed in a configuration where a trip of the main generator could overload the 13.8 kV offsite source. With one or two RCPs supplied by the 13.8 kV offsite source, the 13.8 kV source retains sufficient capacity to support ESF loads required in Modes 3 and 4. Thus, this change has no significant adverse effect on safety.</p>	3.8.1 RA A.2 Note	3.7.B.3	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.2 - AC SOURCES SHUTDOWN				
L1	<p>CTS specify that AC electrical power sources and distribution must be operable under all conditions including cold shutdown. ITS specify that the AC electrical power sources and distribution must be operable in Modes 5 and 6 and during movement of irradiated fuel. The ITS definition of Mode applies only when fuel is in the reactor vessel; thus, ITS eliminate TS requirements for when there is no fuel in the reactor vessel unless irradiated fuel assemblies are being moved. In general, when the plant is shut down, ITS requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. Therefore, this change has no significant adverse effect on safety.</p>	LCO 3.8.2 Applicability	3.7.F	I
L2	<p>CTS include requirements for periodic testing and surveillance of the AC power sources, specifically the diesel generators, and these requirements apply in all Modes. ITS modifies this requirement by identifying certain surveillances that are not required to be met in Modes 5 and 6, and certain surveillances that are not required to be performed in Modes 5 and 6.</p>	SR 3.8.2.1	4.6.A	II

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR				
L1	<p>CTS require weekly verification of the fuel inventory for DGs 31, 32, and 33. DG fuel inventory includes the DG day tanks, the offsite fuel oil reserve, and the DG fuel oil storage tanks. ITS maintain the requirement to verify the DG fuel oil inventory in the DG fuel oil storage tanks, but decrease the frequency from weekly to every 31 days. This change has no significant adverse effect on safety because a 31-day SR Frequency is adequate to ensure the effectiveness of the administrative controls that maintain the tank volume within required limits.</p>	<p>3.8.3 SR 3.8.3.2 3.8.1</p>	<p>Table 4.1-3 Item 8</p>	<p>II</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS set no requirements for fuel oil properties except that offsite reserves be compatible with the DGs; thus, DGs must be declared inoperable if fuel oil properties affect starting or endurance. ITS require fuel oil in storage tanks and offsite reserves meet acceptance criteria, and be verified to meet criteria at a specified frequency. In conjunction with new requirements, ITS add RAs and Completion Times. The RAs allow time to restore properties within limits before declaring the DG inoperable. Since CTS imply DG operability could be affected by oil properties and require that an affected DG be declared inoperable if properties are unmet, addition of an allowance permitting restoration time is a less restrictive change.</p>	<p>SR 3.8.3.3 Condition D Condition E CONDITION F RAs COMPLETION TIMES</p> <p>SR 3.8.3.4 CONDITION D CONDITION E CONDITION F RAs COMPLETION TIMES</p> <p>5.5.12</p>	<p>3.7</p> <p>4.6</p> <p>3.7.A.5</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
- II - Relaxation of Surveillance Requirement V - Relaxation of LCO
- III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS do not establish requirements for DG air start receiver pressure, but DGs would be declared inoperable immediately if air start receiver pressure were less than the pressure required to complete four start attempts as specified in FSAR 8.2. ITS allow 48 hours to restore pressure if the starting air receiver pressure is insufficient for four successive DG start attempts but sufficient for one start attempt. This allowance is less restrictive since it provides additional time to restore from a condition that under the CTS would result in the DG being inoperable immediately. Therefore, if sufficient starting air for at least one start attempt is maintained during the new restoration period then the DG is still capable of performing its safety function. This change has no significant effect on safety because of the limited level of degradation permitted by this new condition and the limited time this condition is allowed to persist.</p>	LCO 3.8.3 Condition G	3.7 4.6	III
L4	<p>CTS 3.7.A.5 requires that each DG fuel oil storage tank contain 6671 gallons of fuel oil when above cold shutdown and CTS 3.7.F.4 requires a total of 6671 gallons of fuel oil must be maintained in the DG fuel oil storage tanks under all conditions including cold shutdown. ITS 3.8.3 maintains the requirement for minimum fuel oil volume in each fuel oil storage tank with two differences. ITS LCO 3.8.3 establishes the fuel oil requirement in terms of usable fuel and not total tank volume, and the CTS 5891 gallon usable volume figure is changed to 5365 gallons in ITS LCO 3.8.3 and SR 3.8.3.2, by a revised calculation. Changing to a “usable volume” instead of a total volume is acceptable because this ensures that adequate fuel oil volume is available to supply the DG, and changing the required usable volume to 5365 is acceptable because using the actual DG accident loading instead of the nameplate load ratings is an acceptable method for calculation of DG fuel oil volume requirements as listed in RG 1.137 item C.2.c(2).</p>	3.8.3	3.7.A.5 3.7.F.4	V

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L5	<p>CTS 3.7.A.5 requires that an additional 30026 gallons of fuel oil be available when above cold shutdown. ITS 3.8.3. maintains the requirement for additional fuel oil volume in storage on site with the identical two differences stated above in L4, to change to usable volume and using a revised calculation listed in RG 1.137 item C.2.c(2). The resulting usable oil volume to be required by ITS is 26,826 gallons.</p>			V
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING				
L1	<p>CTS require batteries 31, 32, and 33 and chargers 31, 32, and 33 to be operable. CTS specify RAs for an inoperable battery with a stipulation that the associated battery charger must be operable during the two hour AOT for a battery. No action is specified for an inoperable battery charger; thus, CTS requires that the plant be shut down immediately if a charger becomes inoperable. Under the same conditions, ITS allow 2 hours to restore an inoperable battery and/or charger. Thus, this change extends the AOT for a charger to 2 hours. The 2 hour AOT for a battery charger is based on Regulatory Guide 1.93 and reflects a reasonable time to assess unit status as a function of the inoperable battery or charger and provides a reasonable time to initiate an orderly and safe unit shutdown if DC electrical power subsystem is not restored. Therefore, this change does not have a significant adverse effect on safety.</p>	LCO 3.8.4 Condition B	3.7.A.6 3.7.B.4	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS limit concurrent inoperable power sources by limiting the RAs for inoperable DGs, offsite sources, and batteries to allow any one of these power supplies to be inoperable at any one time. Thus CTS do not permit a battery to be inoperable when either a DG or an offsite source is inoperable. ITS are less restrictive since they do not restrict DC subsystems based on operability of DGs or offsite sources nor do they restrict DGs or offsite sources based on the operability of DC subsystems. In addition, both CTS and ITS both require immediate initiation of shutdown if two batteries or chargers are inoperable. Thus, the maximum effect of the elimination of the restriction in CTS is the potential that ITS would allow initiation of shutdown to be delayed two hours from what would be required by CTS. In addition, ITS would allow more time to initiate shutdown only in very infrequent combinations of inoperabilities. Thus, elimination of the CTS restriction has no significant consequence.</p>	<p>3.8.1 3.8.4</p>	<p>3.7.B 3.7.B.1 3.7.B.2 3.7.B.3</p>	IV
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.6 - BATTERY CELL PARAMETERS				
L1	<p>CTS require verification each month that the voltage of each battery cell is within acceptable limits. ITS maintain this requirement; however, the frequency of this verification is maintained at every 31 days only for designated pilot cells and extended to every 92 days for all other cells. Additionally, experience has shown that verification every 92 days of the voltage of all cells is sufficient for timely identification of the deterioration of an individual cell. The Frequency for SR 3.8.6.1 and SR 3.8.6.2 is consistent with the recommendations of IEEE-450-1995. Therefore, this change has no significant adverse effect on safety.</p>	SR 3.8.6.1 SR 3.8.6.2 SR 3.8.6.1 SR 3.8.4.1	4.6.B.1	II
L2	<p>CTS require verification of pilot cell temperature monthly and of every fifth cell every 3 months. ITS maintains the requirement to verify battery temperature of representative cells every 92 days but omit the requirement to check the temperature of pilot cells every 31 days. The purpose of ITS SR 3.8.6.3 is to prevent operating the battery at low temperatures that would inhibit or reduce battery capacity. The only reason for a low battery temperature is environmental conditions because battery faults typically result in individual cells with higher temperatures. As described in IEEE-450-1995, high temperature cells and battery faults are identified by cell voltage differences. Thus, eliminating the requirement to verify pilot cell temperatures every 31 days extends the frequency from monthly to every 92 days for verification that battery cell temperature is above the specified minimum. This change has no significant safety effect.</p>	3.8.6 SR 3.8.6.3	4.6.B.1 4.6.B.2	II

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
- II - Relaxation of Surveillance Requirement V - Relaxation of LCO
- III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING				
	NONE			
ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN				
	NONE			
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING				
L1	<p>CTS set no Conditions, RAs, or CTs for inoperable distribution subsystems when any required features are inoperable above cold shutdown. With one or more feature inoperable, CTS initiate immediate shutdown with completion in 6 hours and cold shutdown in the following 30. ITS set an eight-hour AOT for one AC subsystem, two hours for one AC VIB, and two hours for one DC subsystem. ITS require the LCO be met for all subsystems within 16 hours. ITS have immediate entry into LCO 3.0.3 if loss of any distribution subsystem, together with any other inoperable component, causes safety function loss. With the new AOT, remaining distribution subsystems can support minimum safety functions needed to shut down the reactor and keep it in safe shutdown, assuming no single failure. Required subsystems must be restored in the specified time to minimize time in this condition since overall reliability is reduced and a single failure in remaining power distribution subsystems could result in minimum required ESF functions not being supported.</p>	<p>LCO 3.8.9 RA A.1</p> <p>LCO 3.8.9 RA B.1</p> <p>LCO 3.8.9 RA C.1</p> <p>3.8.9 Condition E</p> <p>LCO 3.0.3</p>	<p>3.7</p> <p>3.7.C</p>	III

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN				
L1	<p>CTS require that two of the four 480-volt buses 2A, 3A, 5A and 6A be energized under all conditions including cold shutdown. ITS require operability of only those portions of AC, DC, and AC VIB distribution subsystems needed to support equipment required to be operable by other ITS LCOs. This change is less restrictive because LCO 3.8.10 could be satisfied in some cases with only one of the 480-volt buses operable. This change has no effect on safety.</p>	LCO 3.8.10	3.7.F.3	V
L2	<p>CTS specify that AC sources and distribution be operable under all conditions including cold shutdown. ITS specify that AC sources and distribution be operable in Modes 5 and 6 and during movement of irradiated fuel assemblies. The ITS definition of Mode applies only when fuel is in the reactor vessel; thus, ITS eliminates TS requirements for when there is no fuel in the reactor vessel unless irradiated fuel assemblies are being moved. In general, when the plant is shut down, ITS LCO 3.8.10 requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. Thus, this change has no significant adverse effect on safety.</p>	LCO 3.8.10	3.7.F	

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION - 3.9 REFUELING OPERATIONS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION				
L1	CTS requires daily verification that boron concentration of all filled portions of the RCS and the refueling canal is within specified limits while in Mode 6. ITS maintains the requirement for periodic verification that boron concentration of all filled portions of the RCS and the refueling cavity is within specified limits while in Mode 6; however, the required Frequency is extended from daily to every 72 hours.	SR 3.9.1.1	3.8.D	II
L2	CTS specify that if the requirements for refueling boron concentration are not met, then containment integrity must be established. Under the same conditions, ITS require suspending Core Alterations, suspending positive reactivity additions, and initiating action to restore boron concentration to within limit; however, there is no requirement to establish containment integrity.	3.9.1 Actions	3.6.A.2 3.8.D	IV

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.9.2 NUCLEAR INSTRUMENTATION				
	NONE			
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS				
L1	<p>CTS require that the Containment Building Vent and Purge System, including radiation monitors that initiate isolation, must be tested and verified to be operable within 100 hours prior to refueling operations. ITS maintains the requirement for periodic verification that each required containment purge and exhaust valve actuates to the isolation position on an actual or simulated actuation signal; however, the SR Frequency is extended from within 100 hours prior to refueling operations to once every 92 days.</p>	<p>SR 3.9.3.3</p>	<p>3.8.A.8</p>	<p>II</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L2	<p>CTS establishes requirements for items such as containment closure, monitoring of area radiation levels and core flux, and building ventilation. The CTS applicability addresses (fuel) handling operations, RV Head removal/ installation and movement of heavy loads. ITS applicability is during core alterations and during movement of irradiated fuel. ITS does not specify the other applicability statements because the requirements generally pertain to protecting against a fuel handling accident which is not a credible event during the times that do not involve core alterations/ fuel movement.</p>	3.9.3	3.8.A	I
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION -- HIGH WATER LEVEL				
	NONE.			
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL				
	NONE.			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time

- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL				
	NONE			

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L1	NONE			

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.1 - RESPONSIBILITY				
	NONE			
ITS SPECIFICATION 5.2 - ORGANIZATION				
L1	CTS require that an SRO be present in the CR at all times. ITS require that an SRO be present in the CR in Modes 1, 2, 3, or 4 only. When in Modes 5 and 6, 10 CFR 50.54 (m)(2)(iii) requires that a licensed RO be at the controls at all times and 10 CFR 50.54 (m)(2)(ii) requires that an SRO be on site at all times. This change has no significant adverse effect on safety. This change is consistent with 10 CFR 50.54 (m)(2).	5.2.2.b	6.2.2.h	I
L2	CTS require that an individual qualified in radiation protection procedures be on site when fuel is in the reactor. ITS keep this requirement but provide that the position may be vacant for two hours to provide for unexpected absence, provided immediate action is taken to fill the position. This change has no significant adverse safety effect.	5.2.2.d	6.2.2.d	III

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
- II - Relaxation of Surveillance Requirement V - Relaxation of LCO
- III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
L3	<p>CTS require that the Assistant Operations Manager (OM) hold an SRO license, and that the OM either hold or have held an SRO license at IP3. ITS require that either the OM or Assistant OM hold an SRO license. Both CTS and ITS clarify and provide exceptions to the requirements for education, training, and experience of plant personnel specified in ANSI N18.1-1971. ANSI N18.1-1971 requires that the OM hold an SRO license based on the assumption that the SRO licensed shift supervisors report to the OM who reports to the Plant Manager. ANSI N18.1-1971 requires the OM to hold an SRO to ensure he or she has sufficient training to monitor and direct control room activities effectively and to communicate operational issues to higher levels of management effectively. This change has no significant safety effect.</p>	5.2.2.f	6.2.2.i	IV
ITS SPECIFICATION 5.3 - UNIT STAFF QUALIFICATIONS				
	NONE			
ITS SPECIFICATION 5.4 - PROCEDURES				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS				
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)				
	NONE			
TS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT				
	NONE			
ITS SPECIFICATION 5.5.3 - POST ACCIDENT SAMPLING				
	NONE			
ITS SPECIFICATION 5.5.4 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.5 - COMPONENT CYCLIC OR TRANSIENT LIMIT				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.5.6 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM				
	NONE			
ITS SPECIFICATION STEAM GENERATOR (SG) 5.5.8 - TUBE SURVEILLANCE PROGRAM				
L1	CTS specify that the Licensee must inform the NRC before the reactor is brought critical after the reactor is shutdown, or a SG removed from service, to investigate SG tube leakage and/or to plug or otherwise repair a leaking tube; ITS 5.5.8 does not state this requirement explicitly. This reporting requirement was established before the Licensee replaced the SGs to correct a tube leakage problem. Removal of this requirement is acceptable because new SGs have been installed and existing regulatory reporting requirements ensure that reporting of SG tube degradation is consistent with regulations and industry practice.	5.5.8	3.1.F.7	VI

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.5.9 - SECONDARY WATER CHEMISTRY PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)				
	NONE			
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM				
	NONE			
ITS SPECIFICATION 5.5.13 - TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM				
	NONE			

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)				
	NONE			
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM				
	NONE			
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS				
L1	CTS specify special reporting requirements associated with reactor coolant exceeding specific activity limits. This requirement is unnecessary since ITS establish requirements maintaining RCS specific activity and actions with completion times if these limits are unmet. ITS establish all necessary requirements to ensure that analysis assumptions about specific activity are maintained or restored to required limits within an appropriate completion time. Reactor shutdown and associated details would be reported according to 10 CFR 50.73. This change is consistent with NUREG-1431. Deletion of a duplicate requirement for a follow-up report has no significant adverse effect on safety.	3.4.16	6.9.1.5	VI

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
- II - Relaxation of Surveillance Requirement V - Relaxation of LCO
- III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

Discussion of Change	Summary of Change	ITS Section	CTS Section	Category
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA				
L1	<p>CTS specify that health physics personnel shall be exempt from the Radiation Work Permit (RWP) issuance requirements for entries into high radiation areas during performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. ITS expand this allowance to include personnel continuously escorted by health physics personnel provided they are otherwise following plant radiation protection procedures for entry into high radiation areas. Having a health physics person with a group in a high radiation area continuously provides the group with the ability to identify and respond to radiological situations that is equal to or better than the ability of a group without a health physics person working under the requirements established by a RWP. Thus, this change has no significant adverse effect on personnel safety.</p>	<p>5.7.1 5.7.1.c</p>	<p>6.12.1 footnote*</p>	<p>V</p>
L2	<p>CTS does not contain alternative methods for access control in radiation areas >1000 mrem/hr. ITS adopts the alternative methods of access control (direct or remote surveillance) as described in NUREG-1431.</p>	<p>5.7.2 5.7.3</p>	<p>6.12</p>	<p>II</p>

Categories for L-Table

- I - Relaxation of Modes of Applicability
- II - Relaxation of Surveillance Requirement
- III - Relaxation of Completion Time
- IV - Relaxation of Required Actions
- V - Relaxation of LCO
- VI - Relaxation of Reporting Requirement

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

DOC	CTS	Destination Document	Description	Control	Change Type
LA1	1.2.5	FSAR Plant procedures	CTS defines "Refueling" as occurring only when specified conditions including $T_{avg} \leq 140$ °F exist. However, no reactor condition is defined nor Actions specified, if T_{avg} is > 140 °F, the reactor is otherwise in Refueling. The equivalent ITS definition specifies that Refueling exists when one or more reactor vessel head closure bolts are less than fully tensioned whatever the RCS temperature. The requirement to keep $T_{avg} \leq 140$ °F when the reactor is in Mode 6 is not included in the ITS but relocated to the FSAR and plant procedures.	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

DOC	CTS	Destination Document	Description	Control	Change Type
LA1	6.7.1.a 6.7.1.b 6.7.1.c 6.7.1.d	N/A	CTS specify that operation following a SL violation may be resumed in accordance with 10 CFR 50.36(c)(1)(i). In addition, CTS set requirements for reporting SL violations both within the Entergy Nuclear Northeast (Entergy) and to the NRC. ITS do not specify the internal or external reporting requirements created by a SL violation. In addition, ITS do not specify that 10 CFR 50 requirements govern reactor startup following a SL violation.	10 CFR 50.36(c)(1)(i)	4

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

DOC	CTS	Destination Document	Description	Control	Change Type
			NONE		

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.1.1- SHUTDOWN MARGIN					
LA1	3.10.1.1	COLR	Specific value for shutdown margin limit replaced with reference to Core Operating Limits Report (COLR).	ITS 5.6.5	3
ITS SECTION 3.1.2 - CORE REACTIVITY					
LA1	3.10.10	BASES	Specific details regarding what parameters to consider in measuring core reactivity are moved to the Bases.	ITS 5.5.13	3
ITS SECTION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC)					
			NONE.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS					
LA1	3.10.7.3	3.1.4 BASES	The CTS and ITS sections address the need for a re-evaluation of safety analyses in the case of plant operation for more than 5 days with a misaligned rod. This change relocates details regarding the required aspects of the analyses to the Bases.	ITS 5.5.13	2
LA2	3.10.9 Tble 4.1-1	TRM	CTS requirements regarding the rod position deviation monitor are relocated to the FSAR.	10 CFR 50.59	2
ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS					
			NONE.		
ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS					
			NONE.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.1.7 - ROD POSITION INDICATION					
			NONE.		
ITS SECTION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2					
LA1	3.10.1.1	COLR	Replaced specific value for shutdown margin limit with reference to the limits specified in the COLR. Administrative controls over the COLR are provided in ITS 5.6.5	ITS 5.6.5	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$)					
LA1	3.10.2.1	COLR	The $F_Q(Z)$ relationships and specific values as well as the requirements for power distribution mapping and computing $F_Q(Z)$ provided in the CTS are moved to the COLR.	ITS 5.6.5	3
LA2 (was A10)	3.10.11	N/A	CTS specify that any event requiring plant shutdown on trip setpoint reduction shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS. This is an equivalent administrative change.	10 CFR 50.72 10 CFR 50.73	4
ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR ($F_{\Delta H}^H$)					
LA1	3.10.2.1	COLR	The information in CTS concerning $F_{\Delta H}^N$ calculation and measurement uncertainty compensation as well as the use of the movable incore detectors to create a power distribution map are moved to the COLR.	ITS 5.6.5	3

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2 (was A7)	3.10.11	N/A	CTS specify that any event requiring plant shutdown on trip setpoint reduction shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS.	10 CFR 50.72 10 CFR 50.73	4
ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD)					
LA1	3.10.2 3.10.2.6.1	COLR	The requirement for maintaining AFD within the target band within the target flux difference is moved to the COLR.	ITS 5.6.5	3
ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR)					
LA1	3.10.3.4	TRM	The requirement for the tilt deviation alarm in ensuring the QPTR limits are met is moved to the TRM.	10 CFR 50.59	3
LA2	3.10.2.9	BASES	The details for the use of incore detectors to determine QPTR are relocated to the Bases.	ITS 5.5.13	2 & 3
LA3 (was A8)	3.10.11	N/A	CTS specify that any event requiring plant shutdown on trip setpoint reduction shall be reported to the NRC within 30 days. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not necessary to be repeated in the ITS. This is an equivalent administrative change.	10 CFR 50.72 10 CFR 50.73	4

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION					
LA1	3.5 Table 3.5-2	ITS Bases 3.3.1 FSAR	CTS identify the number of channels and the channels required to trip for each RPS and ESFAS Function. ITS LCO 3.3.1, 3.3.2, 3.3.3, 3.3.5, and 3.3.6 require that these functions be operable but do not provide system design details. This change allows the description of the design of instrument functions to be in the FSAR and the detailed description of the requirements for operability of these functions to be maintained in the ITS Bases.	10 CFR 50.59 ITS 5.5.13	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA2	Table 4.1-1	ITS Bases 3.3.1	CTS include Remarks and Notes not related directly to operability of any RPS or ESFAS function. ITS set clear operability and testing requirements for each RPS and ESFAS function in a format not requiring Notes or Remarks. This information can be defined and controlled in ITS Bases. This provides effective regulatory and change control. Safety is unaffected since there is no change in the requirement to keep the instrumentation operable.	ITS 5.5.13	2
ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA1	Table 3.5-3 Table 3.5-4	ITS Bases 3.3.2 FSAR	CTS identify number of channels and channels required to trip for each RPS and ESFAS Function. ITS LCO 3.3.1- 3.3.6 require these functions operable but do not provide system design details. This change, which allows the description of the design of instrument functions to stay in the FSAR and detailed description of operability requirements for these functions to be in ITS Bases, is consistent with NUREG-1431 for all LCOs. IP3 programs that implement FSAR changes according to 10 CFR 50.59 and ITS Bases changes according to ITS 5.5.13 require periodic submittal of FSAR and Bases changes to the NRC for review. This is a less restrictive administrative change with no safety effect since no requirements are deleted, and change control and regulatory oversight are maintained for relocated information.	10 CFR 50.59 ITS 5.5.13	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA2	Table 4.1-1	ITS Bases 3.3.2	<p>CTS Tables 3.5-2, 3.5-3, 3.5-4, and 4.1-1 include Remarks and Notes not directly related to operability of any RPS or ESFAS function. ITS establish clear requirements for operability and testing of each RPS and ESFAS function in a format not requiring use of these Notes or Remarks. This information can be defined and controlled adequately in the ITS 3.3 Bases which require change control according to ITS 5.5.12, Bases Control Program. This provides effective regulatory control and appropriate change control. Safety is unaffected since there is no change in the requirement to keep the instrumentation operable. Furthermore, NRC and licensee resources associated with processing license amendments to these requirements will be reduced. This is a less restrictive administrative change with no safety effect.</p>	ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION					
LA1	Table 3.5-5	FSAR	CTS contains requirements for indicators, recorders, and alarms under the heading of "Indicators and / or Recorders Available to the Operator." The information was originally in place prior to the establishment of Regulatory Guide 1.97 requirements, but was updated to include PAM instruments. ITS incorporates CTS Regulatory Guide 1.97 requirements, however several instruments that are not Type A or Category I are relocated to the FSAR.	10 CFR 50.59	2
LA2	Table 3.5-5	Bases	CTS contains design information regarding the availability of indicators and / or recorders for various parameters including Regulatory Guide 1.97 instruments. This information is not needed to specify the requirements of ITS 3.3.3 and is relocated to the Bases.	ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA3	Table 4.1-1	FSAR	CTS contains surveillance requirements for 'Indicators and Recorders Available to the Operator.' ITS maintains requirements for Channel Checks and Calibrations for Regulatory Guide 1.97 Type A and Category I instruments. However, CTS requirements for Channel Operational Test of associated alarms that are not required for Reg Guide 1.97 function are relocated to the FSAR.	10 CFR 50.59	2 & 3
LA4	3.3.A.3.K	FSAR	CTS require RWST level alarm to be operable and set to alarm between 10.5 feet and 12.5 feet of water in the tank. ITS maintains surveillance requirements for channel calibration, however specific acceptance criteria are relocated to the FSAR.	10 CFR 50.59	3
LA5			Not Used.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA6	Table 3.5-4 Note 3	FSAR	CTS establishes required actions, including alternate monitoring capability when Containment Area Radiation and Main Steam Line Radiation instrumentation is not fully operable. ITS maintain Required Actions for loss of redundancy and loss of function for these and other Regulatory Guide 1.97 variables. ITS LCO 3.3.3 addresses alternate monitoring via ITS 5.6.7, however, specific time limits for implementing alternate monitoring are relocated to the FSAR.	10 CFR 50.59	3
LA7	Table 3.5-5 Note **	FSAR	CTS establishes a 7-day AOT for loss of a PAM instrument channel and a 14-day AOT for loss of the associated recorder. ITS maintain Required Actions for loss of redundancy and loss of function for PAM instrument channels. However AOTs for PAM instrument recorder capability are relocated to the FSAR.	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION					
LA1	Table 3.5-3	ITS Bases 3.3.5 FSAR	CTS identify number of channels and channels required to trip for each RPS and ESFAS function. ITS LCO 3.3.1 through 3.3.6 require that these functions be operable but do not give design details. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and appropriate change control and regulatory oversight are maintained for relocated information.	10 CFR 50.59 ITS 5.5.13	1
LA2	Table 3.5-1 Note**	ITS Bases 3.3.5	CTS have no time delay requirements for the 480V Bus undervoltage relay since the undervoltage protection devices used to start DGs are induction disc relays; thus, time to trip decreases as a function of voltage decrease below setpoint. This detail is not in ITS 3.3.5, but is relocated. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and change control and oversight are maintained for the information being relocated.	ITS 5.5.13	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
LA3	Table 4.1-1	FSAR	<p>CTS include requirements for testing the 480V safeguards bus undervoltage alarm. This requirement is not in ITS 3.3.5 and is relocated to the FSAR and Plant procedures. In addition, IP3 programs that implement FSAR changes according to 10 CFR 50.59 require periodic submittal of FSAR and Bases changes to the NRC for review. This change is a less restrictive administrative change with no effect on safety since appropriate change control and oversight are maintained for the information being relocated out of the TS.</p>	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	DESTINATION DOCUMENT	DESCRIPTION	CONTROL	CHANGE TYPE
ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION					
LA1	3.5 Table 3.5-2 Table 3.5-3 Table 3.5-4	ITS Bases 3.3.6 FSAR	CTS identify number of channels and channels required to trip for this Function. ITS LCO3.3.6 requires these functions be operable but do not provide system design details. This is a less restrictive administrative change with no safety effect since no TS requirements are deleted, and appropriate change control and oversight are kept for information relocated out of TS.	ITS 5.5.13 10 CFR 50.59	1
ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS)					
			None		
ITS SPECIFICATION 3.3.8 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS) ACTUATION INSTRUMENTATION					
			None		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.4 - REACTOR COOLANT SYSTEM (RCS)

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS					
		None			
ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY					
		None			
ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS					
LA1	3.1.b 4.3	LCO 3.4.3 Bases	CTS include information such as: the information that limits must be recalculated periodically; the clarification that heatup and cooldown rates are based on the average temperature over a one hour period; and, requirements for vessel specimen removal. These details are not retained in the ITS and are relocated.	ITS 5.5.13	3
ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2					
		NONE			

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3					
		NONE.			
ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4					
LA1	3.3.A.6	ITS 3.4.6 Bases	CTS have decay heat removal requirements that include a list of principal components in the decay heat removal loop such as heat exchangers, piping, and valves. ITS has requirements for either RCS loops or RHR loops. The details about what constitutes an operable loop are moved to the Bases of ITS 3.4.6.	ITS 5.5.13	1
ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED					
LA1	3.3.A.7	ITS 3.4.7 Bases	CTS have requirements for decay heat removal using RHR pumps in Mode 5 that include a listing of the principal components in the decay heat removal loop. ITS set requirements for RHR loops except that the details about what constitutes an operable loop are moved to the Bases of ITS 3.4.7.	ITS 5.5.13	1

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED					
LA1	3.3.A.7	ITS 3.4.8 Bases	CTS sets requirements for decay heat removal using RHR pumps in Mode 5 that include a list of principle components in the decay heat removal loop. ITS LCO 3.4.8 also sets requirements for RHR loops, but the details about what constitutes an operable loop are moved to the Bases of ITS 3.4.8.	ITS 5.5.13	1
ITS SPECIFICATION 3.4.9 - PRESSURIZER					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES					
LA1	3.1.A.2	TRM	CTS require at least one operable pressurizer code safety valve or an opening \geq the size of one code safety valve flange whenever the reactor head is on the vessel. ITS keep this requirement in Modes 1, 2, and 3, and in Mode 4 when above the Low Temperature Overpressure Protection (LTOP) arming temperature; however, ITS do not include any requirements for pressurizer code safety valves below the LTOP arming temperature. When below the LTOP arming temperature, requirements needed to satisfy ASME Code for at least one pressurizer code safety valve or an opening \geq the size of one code safety valve flange will be maintained in the FSAR.	10 CFR 50.59	2 & 3
LA2	Table 4.1-3	IST Program	CTS require verification of setpoints every 24 months. ITS keep the requirement to verify the operability of pressurizer safety valves including setpoint verification; however, the frequency is specified as in accordance with the Inservice Test (IST) Program.	ITS 5.5.7 10 CFR 50.55a(f)	3
ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)					
		None			

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP)					
LA1		Not used			
LA2	Table 3.5-3, Item 5	ITS 3.4.12 Bases FSAR	Three RCS pressure channels and three RCS temperature channels support OPS operability. For both functions, two channels are needed to actuate; so, CTS require two operable channels and a minimum degree of redundancy of 1. ITS 3.4.12 requires OPS operability, but pressure and temperature channel requirements are moved to ITS Bases. ITS Bases specify that OPS is operable for LTOP when three RCS pressure channels and three RCS temperature channels are operable and when an inoperable pressure or temperature channel is tripped. Allowing the logic description to be in the FSAR and operability requirements in ITS Bases, is consistent with NUREG-1431.	10 CFR 50.59 ITS 5.5.13	2 & 3

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	3.3.A.10	ITS LCO 3.4.12 Bases	If RCS vent size and pressurizer level restrictions are met, CTS allow two HHSI pumps to be able to inject into RCS when RCS is < 319 °F and/or RHR is not isolated. The level restriction requires indicated level to be 0% with an allowance that alternate methods and instrumentation may confirm actual RCS elevation. ITS keep CTS allowances and let two HHSI pumps be aligned to RCS and energized if RCS vent and pressurizer level restrictions are met; but the information that indicated level may be used and the allowance that alternate methods and instrumentation may be used to confirm actual RCS elevation are in ITS Bases. This is acceptable since ITS require level ≤ 0% as a condition to have HHSI pumps able to inject into RCS. Information on verifying level is a design issue more appropriately controlled in ITS Bases.	ITS 5.5.13	3
LA4	3.1.A.8 3.1.A.8.c.2	TRM	CTS specify requirements for the Overpressure Protection System (OPS) or an RCS vent when the RCS temperature is < 319 °F.	10 CFR 50.59	3
ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE					
			NONE		

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE					
LA1	4.5.B.2.c 4.5.B.2.d	FSAR	CTS list PIVs requiring leak tests. ITS keep the requirement to test PIVs currently listed in CTS, but the list of PIVs under ITS is in the FSAR.	10 CFR 50.59	1
ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION					
			None		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY					
LA1	3.1.D	ITS Bases	<p>CTS specify that limits on specific activity apply only to "noble gases with half-lives greater than 10 minutes." ITS establishes limits for gross specific activity with the clarification in the ITS Bases that gross specific activity is a quantitative measure of radionuclides with half lives longer than 10 minutes, excluding iodines. These descriptions of what constitutes a gross specific activity determination are not retained in ITS, but are moved to the Bases. This change is acceptable because ITS keeps the requirement that reactor coolant activity levels be kept within the specified limits. Keeping this information in the Bases is acceptable since 10 CFR 50.59 and ITS 5.5.13 ensure that changes to the ITS Bases do not result in changes to the TS and do not result in significant increases in the probability or consequences of accidents previously evaluated, do not create the possibility of a new or different kind of accident, and do not result in a significant reduction in a margin of safety. Also, IP3 programs that implement ITS Bases changes according to ITS 5.5.13 require submittal of Bases changes to the NRC.</p>	<p>10 CFR 50.59</p> <p>ITS 5.5.13</p>	2 & 3

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	Table 4.1-2, Item 1	ODCM / FSAR	<p>The CTS reactor coolant tritium SR is not in ITS but moved to the Offsite Dose Calculation Manual (ODCM). This is acceptable since neither CTS nor ITS have LCOs for operation or acceptance criteria related to coolant tritium or the coolant radiochemical spectrum. Coolant tritium and radiochemical spectrum are related to limits in the ODCM now. Moving these requirements to the ODCM neither eliminates nor reduces TS or ODCM requirements. Keeping these in the ODCM is acceptable since the NRC approves the ODCM, and ITS 5.5.1 controls changes. ITS 5.5.1.a oversees ODCM changes by requiring that changes: a) maintain radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I; and, b) not affect accuracy or reliability of effluent, dose, or setpoint calculations. Also, ITS 5.5.1.c requires changes be submitted to the NRC with the Radioactive Effluent Release Report required by ITS 5.6. In addition, at IP3 the ODCM is in the plant FSAR. Thus, moving these requirements to the ODCM does not change existing requirements, and ITS 5.5.1 and 10 CFR 50.59 provide change control.</p>	<p>ITS 5.5.1</p> <p>10 CFR 50.59</p>	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 4.1-2, Item 1	FSAR / Plant procedures	CTS include a surveillance for a twice weekly measurement of boron concentration. ITS do not retain this requirement which is being relocated to plant procedures. Maintaining requirements for measurement of boron concentration outside of TS is acceptable because boron concentration is an intrinsic part of the verification that SDM and control rod insertion limits are met. ITS Section 3.1, Reactivity Control Systems, and 3.9, Refueling Operations, maintain requirements for the verification of shutdown margin and rod insertion limits and these requirements ensure that boron concentration is adequately monitored. Therefore, this change is a less restrictive administrative change with no effect on safety.	10 CFR 50.59	3
LA4	Table 4.1-2, Footnote 4	FSAR / Plant procedure	CTS requires increased sampling of RCS gross activity whenever the Gross Failed Fuel Detector (GFFD) is inoperable. ITS maintains requirements for the GFFD in ITS 3.3.3, however, the specific action regarding RCS sampling is relocated.	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

**TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS
ITS SPECIFICATION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)**

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.1 - ACCUMULATORS					
LA1	3.3.A.3.d Table 4.1-1	TRM	CTS require operation of one pressure and one level transmitter per accumulator with calibration every 24 months. ITS require ECCS accumulator pressure and level be within limits, but the requirement for operation of one pressure and one level transmitter per accumulator will be in TRM. This change is acceptable because meeting the ITS requires at least one pressure and one level transmitter operating for each accumulator and that these instruments are calibrated. Therefore, maintaining the requirement in Technical Specifications that ECCS accumulator pressure and level must be verified within required limits every 12 hours and maintaining requirements for operation and calibration of instruments required to perform these verification in the TRM provides an adequate level of assurance that ECCS accumulators will be maintained within required limits.	10 CFR 50.59	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.B.2.b	IST Program	CTS require that accumulator check valves be checked for operability once per 24 months. ITS keep the requirement that ECCS accumulators be operable, but the requirement to test the accumulator check valves is included in the Inservice Test (IST) Program. The IST program is required by ITS 5.5.7. In addition, 10 CFR 50.55a(f) provides the regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves are covered by an IST Program. Thus, keeping the requirement that ECCS accumulators must be operable in ITS 3.5.1 and keeping the requirement for periodic testing of accumulator check valves in the IST Program required by ITS 5.5.7 ensures that check valves will be tested and maintained to ensure ECCS accumulator operability.	ITS 5.5.7 10 CFR 50.55a(f)	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING					
LA1	3.3.A.3.e 3.3.A.3.f 3.3.A.3.g	FSAR ITS 3.5.2 BASES	CTS require three SI pumps, two RHR pumps and heat exchangers, and two recirculation pumps with associated piping and valves when the reactor is > 350°F. ITS require three ECCS trains with definitions in the Bases and system descriptions in the FSAR. The Bases specify that ECCS has three separate systems: HHSI, RHR, and recirculation. Each is divided into subsystems: three 50% capacity HHSI subsystems; two 100% capacity RHR subsystems; and, two 100% capacity recirculation subsystems. Each of these includes valves, heat exchangers, and flow paths. The subsystems are grouped into three trains so that any two can meet all assumed ECCS capability. Setting ECCS requirements in terms of trains with the subsystems and trains defined in the Bases ensures that requirements are understood and consistently applied. ITS keep the existing operability requirement for three ECCS trains; so, there is no change to existing requirements nor safety level.	10 CFR 50.59 ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.B.1	IST Program	CTS require starting the pump quarterly and operating 15 minutes at required pressure for the SI, RHR, CS, and auxiliary component cooling water pumps; and every 24 months for recirculation pumps. ITS keep the requirements to verify each ECCS pump's developed head \geq required head, but frequency is specified according to the IST Program. In addition, the requirement to run each pump 15 minutes is also moved to the IST. The IST Program is required by ITS 5.5.7 and controls inservice testing of ASME Code Class 1, 2, and 3 components. In addition, 10 CFR 50.55a(f) provides regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves be covered by an IST Program.	10 CFR 50.55.a(f) ITS 5.5.7	1
LA3	4.5.A.1.a 4.5.A.1.b 4.5.A.1.d	ITS 3.5.2 BASES FSAR	CTS include detail on ECCS test conditions, performance, and acceptance criteria. ITS keep the requirements for testing ECCS subsystem initiation and positioning of stops for HHSI injection valves, but, detail on SI system test conditions, performance, and acceptance criteria are moved to the ITS Bases.	ITS 5.5.13 10 CFR 50.59	1
LA4	3.3.A.3.n	FSAR Plant procedures.	CTS require RCS temperature not exceed 350 °F unless RHR is in ESF alignment with the normal RHR suction line isolated from RCS. This protects RHR from overpressurization. This lineup is not in ITS 3.5.2 but is in the FSAR and is implemented by procedures.	10 CFR 50.59	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN					
LA1	3.3.A.1.e 3.3.A.1.d	FSAR ITS 3.5.3 BASES	CTS require operability of one RHR pump and heat exchanger and one recirculation pump with piping and valves when the reactor is $\geq 200^{\circ}\text{F}$ but $\leq 350^{\circ}\text{F}$. ITS require operability of one RHR train and one Recirculation train as defined in the ITS 3.5.3 Bases and FSAR.	10 CFR 50.59 ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)					
LA1	Table 4.1-2, item 5	Procedures	CTS requires monthly analysis of ph for the RWST. This requirement is not being retained in ITS and is being relocated to plant procedures. This relocation is acceptable because ph does not influence the ITS RWST requirement for water level and boron concentration.	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.6 - CONTAINMENT SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.1 - CONTAINMENT					
LA1	1.10.2	ITS LCO 3.6.1 BASES	CTS specifies that the equipment door must be closed properly for containment integrity. LCO 3.6.1 and associated SRs do not address the status of the equipment door specifically as a requirement for containment Operability, but the Bases for LCO 3.6.1 specify that the equipment door must be closed. The level of safety is unaffected by the change since there is no change in the requirement to keep the equipment door closed as a condition of containment operability.	ITS 5.5.13	1 & 2
LA2	1.10.1 1.10.3 1.10.4	BASES	CTS sets requirements for non-automatic containment isolation valves. Although this requirement is kept by ITS LCO 3.6.3, the role of non-automatic containment isolation valves is included in the Bases of ITS LCO 3.6.1. CTS also sets requirements for containment airlocks. Although this requirement is kept by ITS LCO 3.6.2, the role of containment airlocks is included in the Bases of ITS LCO 3.6.1. CTS also sets requirements for automatic containment isolation valves. Although this requirement is kept by ITS LCO 3.6.3, the role of containment isolation valves is included in the Bases of ITS LCO 3.6.1.	ITS 5.5.13	1 & 2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS					
LA1	1.10.3	ITS 3.6.2 BASES	CTS specifies that both doors in each personnel air lock must be "properly closed." In addition, CTS specifies that the air lock may be used for entry, egress, or maintenance, at which time at least one air lock door shall be closed. ITS 3.6.2 maintains the requirement that containment air locks must be operable; however, the statement in CTS 1.10.3 that the air lock may be used for its intended purpose is relocated to the ITS 3.6.2 Bases. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.13	1 & 2
ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES					
LA1			Superceded by Amendment 195.		
LA2	1.10.1 1,10.4	ITS LCO 3.6.1 BASES	CTS establish requirements for containment isolation valves. Although this requirement is maintained by ITS LCO 3.6.3, the role of containment isolation valves in containment integrity is also included in the Bases of ITS LCO 3.6.1. Inclusion of requirements in CTS 1.10.1 and CTS 1.10.4 in the Bases for ITS LCO 3.6.1 has no effect on safety.	ITS 5.5.13	1 & 2

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	3.6.D 4.13.A.2	ITS 3.6.3 BASES FSAR	CTS includes valve numbers when identifying containment pressure relief isolation valves and the containment purge supply and exhaust isolation valves. ITS establishes requirements for containment pressure relief isolation valves and containment purge supply and exhaust isolation valves but do not identify specific valve numbers which are relocated to the Bases and FSAR. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.13 10 CFR 50.59	1& 2
ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE					
			NONE.		
ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE					
LA1	3.6.C3	ITS SR 3.6.5.1 BASES FSAR	CTS requires containment ambient temperature to be the arithmetic average of temperatures measured in at least four locations, at least once per 24 hours. ITS keeps the requirement to verify temperature every 24 hours, but the implementation details regarding number and location and the requirement to use an arithmetic average to calculate the temperature are not included in the ITS but are relocated to the ITS SR 3.6.5.1 Bases and FSAR.	ITS 5.5.13 10 CFR 50.59	3
LA2			Not used.		

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 4.1-1, Item 42	FSAR	CTS requires the channel be checked daily and calibrated every 24 months. ITS requires verification every 24 hours that containment temperature is within limits. Although the ITS Bases specify that four temperature sensors be used, no requirement exists to use specific instruments to satisfy ITS SR 3.6.5.1 and no requirement exists for periodic calibration of these instruments. Thus, requirements for verification and calibration of the temperature sensors within containment are moved to the FSAR and Plant procedures.	10 CFR 50.59	3
ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER SYSTEM					
LA1			Not used.		
LA2	4.5.B.1.a 4.5.B.1.b	IST Program	CTS requires each containment spray pump be started periodically and specify acceptance criteria. ITS keeps the requirement, but the required pump run time is relocated to the IST Program.	ITS 5.5.7	3
LA3	4.5.A.2.a	ITS SR 3.6.6.5 Bases ITS SR 3.6.6.6 Bases	CTS specifies requirements for a functional test of the CS system and includes the requirement that “the tests shall be performed with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed.” ITS keeps the requirement for a functional test, but the stipulation that isolation valves be closed is relocated to the Bases.	ITS 5.5.13	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.7 - SPRAY ADDITIVE SYSTEM					
LA1	4.5.A.2.a	ITS SR 3.6.7.4 Bases	CTS requires a functional test of the spray additive system and requires that the tests be done with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed. ITS requires a functional test of the system, but the allowance permitting isolation valves to be closed is relocated to the Bases. The level of safety is unaffected since there is no change in the requirement to maintain operability.	ITS 5.5.13	3
ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS					
LA1	4.5.7.a.1 4.5.7.a.2.b 4.5.7.a.2.c	ITS SR 3.6.8.1 BASES ITS SR 3.6.8.2 BASES ITS SR 3.6.8.3 BASES	CTS requires periodic functional testing of hydrogen recombiners and have detailed acceptance criteria. ITS SR 3.6.8.1 requires a periodic functional test, but acceptance criteria are in ITS SR 3.6.8.1 Bases. CTS requires periodic inspections and have detailed acceptance criteria. ITS SR 3.6.8.2 requires inspections, but acceptance criteria are in ITS SR 3.6.8.2 Bases. CTS requires a periodic resistance to ground check and have detailed acceptance criteria. ITS SR 3.6.8.3 requires a periodic resistance to ground check, but acceptance criteria are in ITS SR 3.6.8.3 Bases. This is a less restrictive administrative change with no safety effect.	ITS 5.5.13	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.7.a.2.a	FSAR Plant procedures	CTS requires a channel calibration of all recombiners' instrumentation and control circuits every 24 months. This requirement is not included in ITS 3.6.8, and is relocated to the Final Safety Analysis Report (FSAR) and implemented by plant procedures.	10 CFR 50.59	3
LA3	3.3.I.1	ITS 3.6.8 BASES	CTS require that two independent hydrogen recombiner systems be Operable. ITS LCO 3.6.8 maintains the requirement that two hydrogen recombiner systems must be Operable; however, the clarification that these systems are independent is relocated to the ITS 3.6.8 Bases. This change is a less restrictive administrative change with no effect on safety.	ITS 5.5.13	1 & 2
ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM					
LA1	3.3.C.2.b	ITS 3.6.9 Condition A BASES	CTS specifies that an automatic IVSW valve may be inoperable seven days if, all valves that provide a duplicate function are Operable. ITS 3.6.9, Condition A, addresses one IVSW automatic actuation valve inoperable with no separate condition entry allowance which means that Condition A only applies if all valves that provide a duplicate function are Operable. The ITS 3.6.9, Condition A Bases, clarifies this with the statement , "With one IVSW automatic actuation valve inoperable, the IVSW function is still available because the redundant automatic actuation valve is OPERABLE. " This is a less restrictive administrative change with no safety effect.	ITS 5.5.13	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.6.10 - WC&PP SYSTEM					
LA1	3.3.D.1	ITS 3.6.10 LCO Bases	CTS specifies that all “required” portions of the WC&PP are pressurized, but some parts of the WC&PP are inoperable and inaccessible. These have been disconnected, and are no longer required. CTS Bases set criteria to determine when a part of WC&PP may be declared not required. ITS SR 3.6.10.1 keeps the requirement that only “required” parts of WC&PP must be pressurized, but CTS and the CTS Bases used to establish criteria to determine when a section of WC&PP can be declared no longer required is moved to the LCO section of the LCO 3.6.10 Bases. This change is a less restrictive administrative change with no safety effect.	ITS 5.5.13	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

3.7 PLANT SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs)					
LA1	4.1	Inservice Testing (IST) Program	The CTS Table 4.1-3 requirement for periodic verification of MSSV lift setpoint is based on the inservice testing requirements of the ASME Section XI Code which is included in the Inservice Testing (IST) Program.	10CFR50.55a(f) ITS 5.5.7	3
ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs)					
LA1	4.7	IST Program	The CTS requirement for MSIV testing is based on the inservice testing requirements of the ASME Section XI Code which is included in the IST Program.	10CFR50.55a(f) ITS 5.5.7	3
ITS SPECIFICATION 3.7.3 - MAIN BOILER FEEDPUMP DISCHARGE VALVES (MBFPDV_s), MAIN FEEDWATER REGULATION VALVES (MBFRV_s), AND MBFRV LOW FLOW BYPASS VALVES					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV)					
			NONE		
ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM					
LA1	3.4.E.1 3.4.E.3	FSAR Plant Procedures	CTS details of AFW operability requirements that are intended to protect the pumps from damage when they are not operable are relocated to Plant Operating Procedures.	10 CFR 50.59	2
LA2	4.8.1.a 4.8.2	IST Program	The CTS requirement for AFW testing is based on the inservice testing requirements of the ASME Section XI Code which is included in the IST Program (includes check valves).	10CFR50.55a(f) ITS 5.5.7	3
LA3 (was A9)	3.4.E	N/A	CTS require that if all 3 AFW pumps are inoperable and cannot be restored within one hour, then the NRC must be notified within 24 hours regarding planned corrective action. ITS does not include this because requirements for reportable events are included in 10 CFR 50.72 and 10 CFR 50.73 and are not repeated in the ITS to avoid the potential for contradictions.	10 CFR 50.72 10 CFR 50.73	4
ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.7 - CITY WATER (CW)					
LA1	4.8.1.c	IST Program	The CTS requirement for testing of the CW supply, as based on the ASME Section XI Code which is included in the IST Program.	10CFR50.55a(f) ITS 5.5.7	3
ITS SPECIFICATION 3.7.8 - COMPONENT COOLING WATER (CCW) SYSTEM					
LA1	3.3.E.1.a 3.3.E.1.c	BASES	The detailed description of the requirements for Operability of the CCW system is relocated to the Bases.	ITS 5.5.13	2
LA2	4.1	FSAR	The requirements for maintaining CCW water chemistry are relocated to the TRM.	10 CFR 50.59	3
LA3	3.3.3.E.1.b 3.3.3.E.2.b	IST Program	The CTS requirement for testing the auxiliary component cooling water pumps is based on the ASME XI Code which is included in the IST Program.	10CFR50.55a(f) ITS 5.5.7	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.9 - SERVICE WATER (SW) SYSTEM					
LA1	3.3.F.4	BASES	Design information on what constitutes Operability of the SWS can be defined and controlled adequately in the ITS Bases.	ITS 5.5.13	2
LA2	Table 4.1-3	IST Program	The CTS requirement for testing of the SWS pumps is being relocated to the Inservice Testing Program.	10CFR50.55a(f) ITS 5.5.7	3
ITS SPECIFICATION 3.7.10 - ULTIMATE HEAT SINK (UHS)					
LA1	3.3.F.5 3.3.F.6 3.3.F.7 3.3.F.8	TRM	Requirements for accelerated monitoring of UHS temperature using specific instruments whenever the UHS temperature is approaching the LCO limit of 95°F are relocated to the TRM.	10 CFR 50.59	3
ITS SPECIFICATION 3.7.11 - CONTROL ROOM VENTILATION SYSTEM (CRVS)					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.7.12 - CONTROL ROOM AIR CONDITIONING SYSTEM (CRACS)					
			NONE		
ITS SPECIFICATION 3.7.13 - FUEL STORAGE BUILDING EMERGENCY VENTILATION SYSTEM (FSBEVS)					
LA1	4.5.A.6.b(3)	FSAR	The CTS requirement for leak testing of the FSBEV's charcoal filter bypass dampers following closure is governed by the IP3 SAR.	10 CFR 50.59	3
ITS SPECIFICATION 3.7.14 - SPENT FUEL PIT WATER LEVEL					
			NONE		
ITS SPECIFICATION 3.7.15 - SPENT FUEL PIT BORON CONCENTRATION					
			NONE		
ITS SPECIFICATION 3.7.16 - SPENT FUEL ASSEMBLY STORAGE					
LA1	3.8.C.7 Figure 3.8-3	BASES.	The description of the layout of the spent fuel storage racks is being relocated to the Bases.	ITS 5.5.13	1
ITS SPECIFICATION 3.7.17 - SECONDARY SPECIFIC ACTIVITY					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.8 - ELECTRICAL POWER SYSTEMS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING					
LA1	3.7.A.1 3.7.A.2 3.7.A.3	FSAR ITS 3.8.1 Bases	CTS require two physically independent transmission circuits to Buchanan substation able to supply engineered safeguards loads; 6.9 kV buses 5 and 6 energized from either 138 kV feeder 95331 or 95332; and, that either 13.8 kV feeder 13W92 or 13W93 and its associated 13.8/6.9 kV transformer be available to supply 6.9 kV power. ITS 3.8.1.a maintains the same requirement by requiring the operability of two qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system, but the description of the design of these circuits and a detailed description of the requirements for operability of these circuits are relocated to the FSAR and the ITS 3.8.1 Bases, respectively. The Bases description of the requirements for operability include the requirement that there must be one offsite circuit into the Buchanan substation for each operable offsite circuit and that these circuits into Buchanan must be physically independent.	10 CFR 50.59 ITS 5.5.13	1

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	3.7.B.3	ITS 3.8.1 Bases	<p>CTS require switches 1-5, 2-5, 3-6, and 4-6 in pull-out when the 13.8 kV source supplies 6.9 kV buses 5 and 6. Following LOOP, autotransfer of 6.9 kV buses 1 through 4 to the 13.8 kV source may violate restrictions on the 13.8 kV source and overload the 13.8 kV/6.9 kV autotransformer. ITS also require disabling autotransfer of buses 1 through 4 to bus 5 and 6 under the same conditions. (See 3.8.1, RA A.2). Details on disabling autotransfer are in Bases. Removing the requirement to have tie breakers in pull-out eliminates a restriction against using the 13.8 kV source to feed buses 1 through 4, consistent with load restrictions with the reactor down. ITS ensure that Bases changes do not change TS, increase probability or consequences of accidents previously evaluated, create new or different accidents, or reduce safety margin. Further, programs changing Bases according to ITS require NRC submittals. This is a less restrictive administrative change with no safety effect.</p>	ITS 5.5.13	1
LA3			Not Used		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA4	4.6.A.4	FSAR	<p>CTS 4.6.A.4 requires that each diesel generator be inspected and maintained following the manufacturer's recommendations for this class of standby service. ITS LCO 3.8.1 does not include this requirement; however, this requirement will be maintained in the Final Safety Analysis Report (FSAR) and implemented by plant procedures. This change is acceptable because performance the SRs required by ITS 3.8.1 are sufficient to demonstrate the Operability of the DGs. Inspecting and maintaining the DGs in accordance with the manufacturer's recommendations is routine preventative maintenance and is not a direct demonstration that a DG is capable of performing its intended safety function. Changes to the FSAR can be made only in accordance with the requirements of 10 CFR 50.59. Therefore, this change is acceptable because there is no change to the existing requirements by the relocation of requirements to the FSAR and future changes to the FSAR will be controlled in accordance with 10 CFR 50.59.</p>	10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.2 - AC SOURCES SHUTDOWN					
LA1	3.7.F.1	FSAR ITS Bases	<p>CTS require one operable transmission circuit to Buchanan Substation, and, that either 6.9 kV buses 5 or 6 be energized from 138 kV feeder 95331 or 95332, or that 13.8 kV feeder 13W92 or 13W93 and its associated 13.8/6.9 kV transformer be available to supply 6.9 kV power. ITS LCO 3.8.2.a requires operability of one circuit between the offsite transmission network and the onsite AC electrical power distribution subsystem required by ITS LCO 3.8.10 to be operable, but, the circuit design description and a detailed description of their operability requirements are moved to the FSAR and the ITS 3.8.1 Bases. This change is consistent with NUREG-1431 for all LCOs. In addition, programs that implement FSAR changes according to 10 CFR 50.59 and ITS Bases changes according to ITS 5.5.13 require submittal of FSAR and Bases changes to the NRC. This is a less restrictive administrative change with no safety effect since no requirements are deleted from TS and an appropriate change control process and an appropriate level of regulatory oversight are maintained for the information being relocated out of the TS.</p>	10 CFR 50.59 ITS 5.5.13	1

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR					
LA1	3.7.A.5	ITS Bases LCO 3.8.3 FSAR	CTS specify that the 30,026 gallons required in offsite fuel oil reserves must be designated for IP3 use only and must be in addition to fuel requirements for other nuclear units on site. ITS LCO 3.8.3 keeps the requirement to maintain greater than a specified minimum volume of fuel oil in reserves, but the clarification that reserve minimum may include only oil designated for exclusive IP3 use is in the Bases for ITS LCO 3.8.3 and FSAR. This is consistent with NUREG-1431.	ITS 5.5.13 10 CFR 50.59	1
ITS SPECIFICATION 3.8.4 - DC SOURCES OPERATING					
			NONE		
ITS SPECIFICATION 3.8.5 - DC SOURCES SHUTDOWN					
			NONE		

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.8.6 - BATTERY CELL PARAMETERS					
LA1	4.6.B.2	FSAR	<p>CTS require each battery be subjected to a 24-hour equalizing charge every three months. ITS 3.8.6 does not include this since an equalizing charge is routine maintenance. Thus, this requirement is moved to the FSAR and implemented through Plant procedures. Equalizing charge according to the manufacturer's recommendations must be done to satisfy the SRs required by ITS 3.8.4 and 3.8.6 and is not a direct demonstration that a battery can perform its function. This is a less restrictive administrative change with no safety effect since ITS 3.8.4 keeps the requirements to have batteries operable and ITS 3.8.4 SRs and 3.8.6 SRs keep requirements for periodic testing demonstrating battery operability. Thus, requirements for equalizing charges on the batteries according to manufacturer's recommendations can be in the FSAR with no significant adverse safety effect.</p>	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.6.B.1 4.6.B.2	ITS Bases SR 3.8.6.3	CTS require verifying battery temperature periodically. ITS specify that temperature be measured on representative cells. Requirements on what constitutes a representative cell are moved to ITS Bases. This surveillance avoids operating batteries at low temperatures that would inhibit capacity. The cause of low battery temperature is environmental since battery faults typically result in individual cells with higher temperatures. Since environmental temperature affects all cells, number and selection of representative cells is not critical. Thus, moving this requirement to ITS Bases has no significant adverse safety effect. In addition, programs implementing Bases changes require submittal of changes to the NRC. This is a less restrictive administrative change with no safety effect since no TS requirements are deleted and change control and oversight are kept.	10 CFR 50.59 ITS 5.5.13	3
ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING					
			NONE		
ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN					
			NONE		
ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA1	3.7.A.4	ITS Bases LCO 3.8.9 Table B3.8.9-1	<p>CTS require four 480V buses energized and tie breakers between buses 5A and 2A, and between buses 3A and 6A, opened. ITS LCO 3.8.9 requires that AC, DC, and VIB electrical power distribution subsystems for trains 5A, 2A/3A, and 6A be operable. Details about which buses are covered by ITS LCO 3.8.9 and the stipulation that specific bus tie breakers must be open is in ITS Bases. In addition, the definition of operability ensures that required buses are operable since for any required component to be operable, the normal or emergency electrical power source must also be able to perform their related support function. Thus, details about which buses are covered is not an essential element of the requirement and can be moved to ITS Bases. Furthermore, ITS 5.5.13 ensures that changes to ITS Bases do not result in changes to TS and do not result in significant increases in the probability or consequences of accidents previously evaluated, do not create the possibility of a new or different kind of accident, and do not result in a significant reduction in a margin of safety. In addition, programs that implement ITS Bases changes in accordance with ITS 5.5.13 require periodic submittal of Bases changes to the NRC. This change is a less restrictive administrative change with no safety effect since no requirements are being deleted from TS and an appropriate change control process and an appropriate level of regulatory oversight are maintained for the information being relocated out of the TS.</p>	ITS 5.5.13	3
ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
		NONE			

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 3.9 - REFUELING OPERATIONS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION					
LA1	3.8.D	COLR	The CTS contains the refueling SDM limits in specification 3.8.D. ITS 3.9.1 refers to the SDM limits in the COLR. The ITS SDM requirements are the same as the CTS requirements.	ITS 5.6.5	2
ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION					
LA1	3.8.A.4	ITS 3.9.2 Bases FSAR	CTS require the subcritical core be monitored continuously by two SRMs, and that each have continuous visual control room indication when core geometry is being changed. ITS keep the Mode 6 two SRM requirement, but the visual indication details are relocated to the FSAR and ITS Bases. ITS still require the SRMs be operable and the operability requirements be defined in Bases; so, there is no change to existing requirements nor to safety.	ITS 5.5.13 10 CFR 50.59	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	3.8.A.4	FSAR	CTS require that the subcritical core be continuously monitored by two SRMs and that one SRM have audible indication in containment when core geometry is being changed. ITS require two SRMs in Mode 6 and that core alterations and positive reactivity additions be terminated if only one SRM is operable, but the detail on audible indication in containment is relocated to the FSAR and implemented by plant procedures.	10 CFR 50.59	2
ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS					
			NONE.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION -- HIGH WATER LEVEL					
LA1	3.8.A.13	ITS 3.9.4 BASES	CTS require that either the 31 or 32 RHR pump and heat exchanger, with associated piping and valves, be operable. ITS require that one RHR loop be operable and in operation. The requirements for what constitute an operable RHR loop are moved to ITS Bases. This is acceptable since ITS retains the Mode 6 requirement to have enough decay heat removal capability and boron mixing using RHR loops; there is no change to existing CTS requirements.	ITS 5.5.13	2

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL					
LA1	3.8.A.13	ITS 3.9.5 BASES	CTS require that the 31 and 32 RHR pumps and heat exchanger, with associated piping and valves, be operable, ITS LCO 3.9.5 requires that both RHR loops be operable and operating. The details on what constitutes an operable RHR loop are moved to the Bases. This is acceptable since ITS retains the Mode 6 requirement for enough decay heat removal capability and boron mixing using RHR loops; there is no change to existing CTS requirements.	ITS 5.5.13	2
ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL					
			NONE.		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 4.0 - DESIGN FEATURES

DOC	CTS	Destination Document	Description	Control	Change Type
LA1	5.0	FSAR Bases	CTS include descriptive information about the design and seismic qualification of the reactor containment, containment penetrations, and containment cooling systems, respectively; the description that control rods are 142 inches in length; descriptive information about the design and seismic qualification of the RCS the spent fuel pit structure; and descriptive information about the design of the spent fuel pit. ITS 4.0 does not include this descriptive information. The description of the design of these features and a detailed description of the requirements for operability are relocated to the FSAR and the ITS Bases for the LCOs associated with these features, respectively.	10 CFR 50.59 ITS 5.5.13	1
	5.2.A				
	5.2.B				
	5.2.C				
	5.3.A.5				
	5.3.B				
	5.4.1				
	5.4.2				

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SPECIFICATION 5.0 - ADMINISTRATIVE CONTROLS

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.1 - RESPONSIBILITY					
LA1	6.0	FSAR	<p>CTS identify organizational responsibilities using licensee specific titles. ITS 2.0 and 5.0 use generic titles consistent with ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change because licensee specific management titles used in CTS are moved to the QAP. This approach is consistent with Generic Letter 88-06. The intent of Generic Letter 88-06 and this change is to reduce the unnecessary burden on NRC and licensee resources associated with processing license amendments when organizational titles are changed.</p>	10 CFR 50.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	6.5 6.5.1 6.5.2 6.6.1.b 6.8.2 6.8.3	QAP	CTS set requirements for reviewers and review committees. CTS also set requirements for PORC to review and advise the Site Executive Officer, for SRC to provide independent review and audit of designated activities, for review and oversight of reportable events, for procedure review and approval, and for temporary changes to procedure requirements. Requirements for reviews and audit, for review and approval of programs and procedures, and for oversight and review by PORC and SRC are QA functions and not in ITS. These requirements are moved to the QAP which will set requirements equivalent to CTS.	10 CFR 50.54(a)	3
LA3	6.6.1	N/A	CTS require that the NRC be notified and a report submitted pursuant to the requirements of 10 CFR 50.73. This CTS requirement duplicates requirements imposed by 10 CFR 50.73 and does not need to be repeated in the ITS.	10 CFR 50.73	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.2 - ORGANIZATION					
LA1	6.0	FSAR	CTS identify organizational responsibilities using Licensee specific titles. ITS 2.0 and 5.0 identify responsibilities using generic titles consistent with titles in ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change since Licensee specific titles used in the CTS are moved to the FSAR. This is consistent with Generic Letter (GL) 88-06. The intent of 80-06 and this change is to reduce the burden associated with processing amendments for title changes.	10 CFR 50.59	4
LA2	6.2.2.e Table 6.2-1	FSAR	CTS require core alterations be supervised by a person with an SRO license or an SRO license limited to fuel handling and that this person have no other responsibilities. This is identical to 10 CFR 50.54 (m)(2)(iv) and does not need repetition in ITS. This is also in the FSAR and Plant procedures. In addition, CTS specify that two SROs are needed during core alterations with the clarification that this includes the SRO supervising fuel movement. This is consistent with 10 CFR 50.54 (m)(2) and does not need repetition in ITS. Administrative controls ensure this is understood and implemented.	10 CFR 50.59 10 CFR 50.54(m)(2)	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA3	Table 6.2-1	FSAR	CTS specify the minimum shift crew composition for SROs and ROs which duplicate the requirements specified in 10 CFR 50.54(m)(2)(i). Therefore, minimum shift crew composition for SROs and ROs is not included in the ITS. Adequate administrative controls exist to ensure shift staffing requirements are understood and properly implemented.	10 CFR 50.59 10 CFR 50.54(m)(2)	4
A4	6.2.2.i	FSAR	CTS require that the Shift Manager hold an SRO license. At IP3, Shift Manager is the Licensee specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. Thus, this requirement is redundant to 10 CFR 50.54 (m)(2)(ii) and is not repeated in the ITS.	10 CFR 50.59 10 CFR 50.54(m)(2)	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.3 - UNIT STAFF QUALIFICATIONS					
LA1	6.0	FSAR	CTS identify organizational responsibilities using Licensee specific titles. ITS 2.0 and 5.0 use generic titles consistent with titles used in ANSI N18.1-1971 and Regulatory Guide 1.8, 1975. This is a less restrictive administrative change since Licensee specific titles in the CTS are moved to the FSAR. This is consistent with Generic Letter 88-06. The intent of Generic Letter 88-06 and this change is to reduce the burden associated with processing amendments for organizational title changes.	10 CFR 50.59	4
LA2	6.4.1	FSAR	CTS require that a retraining and replacement training program for the plant staff be maintained under the Training Manager and that this program meet or exceed Section 5.5 of ANSI N18.1-1971 and 10 CFR 55.59. The requirements for a retraining and replacement training program are not retained in the ITS. The level of safety of facility operation is unaffected by the change because there is no change in the overall operational requirements.	10 CFR 50.59 10 CFR 55.59	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.4 - PROCEDURES					
LA1	6.8.1.d 6.8.1.e	NONE	CTS require that written procedures be established, implemented, and maintained for the Security and Emergency Plans. These requirements are not retained in ITS 5.4.1 because 10 CFR already establishes requirements for written procedures for Emergency and Security Plans. This change is consistent with recommendations in Generic Letter 93-07. Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans, and has no significant adverse effect safety.	10 CFR 50.54(p) 10 CFR 50.54(t) 10 CFR 73.55(b)(3) 10 CFR 50 APPENDIX E SECTION V	4
LA2	6.13	FSAR	CTS provide requirements for environmental qualification of electrical equipment. These requirements are not retained in the ITS. Adequate administrative controls exist to ensure this requirement is understood and properly implemented.	10 CFR 50.59 10 CFR 50.49	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS					
ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM)					
LA1	ETS 4.7 Figure ETS 4.7-1 1.19 1.20 1.21 1.24 1.25	ODCM	Some CTS are moved to the ODCM and are not included in the ITS. This change has no significant adverse impact on safety.	ITS 5.5.1	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	6.8.4.b ETS 4.4	ODCM	Some CTS requirements are moved to the ODCM and are not included in the ITS. CTS specify that a REMP must be established and include details about what should be included in the Program. ITS 5.5.1 specifies that the ODCM must contain radiological environmental monitoring activities including descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports. This change has no significant adverse effect on safety.	ITS 5.5.1	4
LA3	ETS 4.6.2.2	ODCM	CTS specify that changes to the ODCM are effective upon approval of the Site Executive Officer. ITS 5.5.1 specifies that changes to the ODCM are effective after the approval of the plant manager. This change adopts the ITS convention of assigning duties and responsibilities in the TS using generic titles (see ITS 5.1, DOC LA.1).	ITS 5.5.1	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT					
LA1	4.4.1	FSAR	<p>CTS require verification that leakage from RHR outside containment is within limits. This ensures post accident off-site exposure due to RHR leakage is insignificant compared to exposures from leakage directly from containment. CTS pre-date NUREG-0737 which expanded leakage requirements to include systems other than RHR. Thus, CTS requirements are a subset of requirements imposed by Facility Operating License DPR-64, paragraph 2.L, which was adopted in response to NUREG-0737. ITS 5.5.2 incorporates the requirements of NUREG-0737 and Facility Operating License DPR-64, paragraph 2.L, but the details for this requirement are in the FSAR, implemented by plant procedures, and subject to 10 CFR 50.59. This change has no significant adverse effect on safety.</p>	10 CFR 50.59	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.3 - POST ACCIDENT SAMPLING					
			NONE		
ITS SPECIFICATION 5.5.4 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM					
LA1	1.23 6.8.4.c 4.5	ODCM	CTS radioactive effluent controls are moved to the ODCM and not included in the ITS.	ITS 5.5.1	4
ITS SPECIFICATION 5.5.5 - COMPONENT CYCLIC OR TRANSIENT LIMIT					
			NONE		
ITS SPECIFICATION 5.5.6 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.7 - INSERVICE TESTING PROGRAM					
LA1	4.2.1.3.d	N/A	<p>CTS specify that detailed records of each ASME Inservice Inspection must be maintained to allow comparison and evaluation of future inspections. This detail is not maintained in ITS 5.5.7, Inservice Testing Program, because requirements for comparison and evaluation of ASME Section XI inspection results are identified in the ASME Boiler and Pressure Vessel Code. There is no change to the existing requirements and appropriate regulatory controls and change control processes are maintained. This change has no significant adverse effect on safety.</p>	ASME Boiler and Pressure Vessel Code	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.8 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM					
LA1 (was A7)	4.9.C.3	N/A	CTS and ITS specify that notification of the NRC within 15 days is required if results of SG tube inspections fall into Category C-3. However, not included in ITS is the detail in CTS that the written follow-up of this report must provide a description of investigations to determine the cause of the tube degradation and corrective measures taken is not included in ITS. This is acceptable because the required follow-up report would be made according to 10 CFR 50.73. Reporting under 10 CFR 50.73 would apply for this situation because Category C-3 results for a SG would meet one or more of the 10 CFR 50.73 reporting criteria. The content requirement for 10 CFR 50.73 reports includes the detailed information described in CTS. This is change has no effect on safety because it only removes a reporting requirement from the CTS which is redundant with reporting requirements already stated in NRC regulations.	10 CFR 50.73	4
ITS SPECIFICATION 5.5.9 - SECONDARY WATER CHEMISTRY PROGRAM					
			NONE		

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.10 - VENTILATION FILTER TESTING PROGRAM (VFTP)					
LA1	4.5.A.4	FSAR	CTS specifies that the Containment Air Filtration System shall use activated charcoal with an ignition temperature greater than 300°F. This is a design parameter maintained in the FSAR, not a test acceptance criteria used in ITS.	10 CFR 50.59	1
LA2	4.5.A.4 4.5.A.5 4.5.A.6 4.13.B	ITS 5.5.10	CTS include technical details that are specified in Regulatory Guide 1.52 and ANSI N510-1975 such as the test fluid for penetration testing. These requirements are maintained in ITS by specific reference to Regulatory Guide 1.52 and ANSI N510-1975. No change control process or regulatory oversight is required to maintain these requirements because specific revisions of Regulatory Guide 1.52 and ANSI N510 are identified in the ITS.	NONE	4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 5.5.11 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM					
LA1	ETS 1.2.1 ETS 2.2.1	ODCM	<p>CTS establish requirements for control of radioactive material in outdoor tanks not surrounded by liners, dikes, or walls able to hold the tank contents and not having tank overflows and surrounding area drains connected to the liquid radwaste treatment system. The requirements include limits on the quantity of radioactive material in these tanks, monitoring of contents, and actions if limits are unmet. ITS 5.5.11 sets the limit on the amount of radioactive material in these tanks, but, requirements for monitoring tank contents and actions if limits are unmet are relocated to the program required by ITS 5.5.11. By maintaining the limit on the quantity of radioactive material in the specified tanks as an ITS requirement, ITS 5.5.11 maintains in TS the limit intended to ensure that in an uncontrolled release of the tanks' contents, resulting concentrations would be < the values in Appendix B, Table 2, Column 2 to 10 CFR 20, at the nearest potable water supply and the nearest surface water supply in an unrestricted area.</p>	ITS 5.5.1 ITS 5.5.11	3 & 4

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	ETS 1.3.1 ETS 2.3.1	TRM	CTS establish requirements for limiting concentration of hydrogen and oxygen in the waste gas holdup system. The requirements include maximum concentrations of hydrogen and oxygen, requirements for periodic monitoring of contents, and actions if limits are unmet. ITS 5.5.11, requires that a program be maintained to limit concentrations of hydrogen and oxygen in the waste gas holdup system and requires that a surveillance program be maintained to ensure these limits are met, but specific requirements for concentration, periodic monitoring of tank contents, and actions if limits are not met are relocated from TS to the program required by ITS 5.5.11. The QAP will be revised to specify that requirements in the TRM are part of the facility as described in the FSAR and that changes to the TRM can be made only in accordance with 10 CFR 50.59.	10 CFR 50.59	3
LA3	ETS 1.3.2 ETS 2.3.2	ODCM	CTS set requirements to control radioactive material in radioactive gas storage tanks. The requirements include limits on quantity of radioactive material in any tank, monitoring of tank contents, and actions if limits are unmet. ITS 5.5.11 keeps the limit on the amount of radioactive material, but requirements for periodic monitoring of contents and actions if limits are unmet are relocated to the ODCM.	ITS 5.5.1 ITS 5.5.11	3

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA4	ETS 1.1.1 ETS 2.1.1	TRM	CTS set requirements for instrumentation used to monitor and control explosive gas in the waste gas holdup system. ITS 5.5.11 requires that a program be maintained to limit hydrogen and oxygen in the waste gas holdup system and ensure limits are met, but specific requirements for operating and testing this instrumentation and compensatory actions are moved to the TRM.	10 CFR 50.59	3
TS SPECIFICATION 5.5.12 - DIESEL FUEL OIL TESTING PROGRAM					
			NONE		
ITS SPECIFICATION 5.5.13 - TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM					
			NONE		
ITS SPECIFICATION 5.5.14 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)					
			NONE		
ITS SPECIFICATION 5.5.15 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM					
			NONE		
ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS					

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
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DOC	CTS	Destination Document	Description	Control	Change Type
LA1	6.9.1.1 6.9.1.2	QAP	<p>CTS require that a Startup Report be submitted to the NRC following: (1) an amendment to the license involving a planned increase in power level; (2) installation of fuel of a different design; and, (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. CTS require that a Startup Report be submitted to the NRC as follows: (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. This requirement is not in ITS. Requirements for startup reports to the NRC are QA functions and are not retained in the ITS. Requirements for startup reports are moved to the QAP which establishes requirements equivalent to those found in the CTS. This provides an effective level of regulatory control and a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change to existing requirements.</p>	10 CFR 50.54(a)	4

Change types for LA-Table

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DOC	CTS	Destination Document	Description	Control	Change Type
LA2	6.10	QAP	CTS specify requirements for record retention. This is not retained in the ITS. Record retention requirements are relocated to the QAP which establishes requirements equivalent to those found in the CTS. Changes to requirements for startup reports will be controlled in accordance with 10 CFR 50.54(a). This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change to the existing requirements.	10 CFR 50.54(a)	4
LA3	4.3.3	None	CTS require that major changes to the radioactive waste systems be reported to the NRC in the Annual Radioactive Effluent Release Report and that this information be submitted as part of the annual FSAR update. This requirement is not retained in the ITS. Radioactive waste systems are described in the FSAR; thus, major changes to these systems must be reported according to 10 CFR 50.71(e). Thus, this change is identical to requirements already imposed by 10 CFR 50.59 and does not need to be repeated in the ITS.	10 CFR 50.59 10 CFR 50.71(e)	4

Change types for LA-Table

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DOC	CTS	Destination Document	Description	Control	Change Type
LA4 (was A8)	6.9.1.4 6.9.1.6.d 6.9.2	None	CTS include the mailing address for submission of required reports. CTS specify that reports shall be submitted to the Regional Administrator-Region 1 within the time specified for each report. This information is unnecessary since all reports are submitted in accordance with the direction provided in 10 CFR 50.4.	10 CFR 50.4	4
ITS SPECIFICATION 5.7 - HIGH RADIATION AREA					
LA1	6.11.1	None	CTS specify that procedures for personnel radiation protection be prepared consistent with 10 CFR 20. In addition, CTS specify that allowance may be made for the use of respiratory protective equipment pursuant to 10 CFR 20.1703. These CTS requirements are identical to requirements imposed by 10 CFR 20.1101, Radiation Protection programs, and 10 CFR 20.1703, Use of individual respiratory protection equipment, and do not need to be repeated in the ITS.	10 CFR 20	4
LA2	6.12	None	CTS identify exceptions taken to 10 CFR 20.1601 pursuant to 10 CFR 20, paragraph 20.1601(c). CTS include the specification that mrem are measured at 30 centimeters from the source of radioactivity and rads are measured at 1 meter from the source of radioactivity. These specifications are not included in the ITS because equivalent but more precise definitions are found throughout 10 CFR 20.	10 CFR 20	4

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TABLE R
RELOCATED TECHNICAL SPECIFICATIONS FROM CTS

DOC	NAME	CTS SECTIONS	DESTINATION
R1	Reactor Vessel Head Vents	3.1.A.7 Table 4.1-3, Item 16	TRM
R2	SG Secondary Side Minimum Temperature for Pressurization	3.B.3	FSAR
R3	Pressurizer Heatup and Cool down	3.1.B.4	TRM
R4	Maximum Reactor Coolant Oxygen, Chloride, and Fluoride Concentration	3.1.E Table 4.1-2	TRM
R5	Chemical and Volume Control Sys.	3.2	N/A; removed by TS Amendment 200
R6	Weld Channel and Penetration Pressurization System (WC & PPS)	3.3.D	N/A; Requirement retained in ITS3.6.10
R7	Steam and Power Conversion System (Turbine Generator)	3.4.D	TRM
R8	Area Radiation Monitoring and Plant Effluent Radiiodine/Particulate Sampling; Plant Wide Range Vent Monitor	3.8.A.3 3.8.C.1 TABLE 3.5-4 TABLE 4.1-1	ODCM and FSAR
R9	Auxiliary Electrical Systems (A.C. Circuit Inside Containment)	3.7.E	TRM
R10	Refueling, Fuel Handling and Storage (Communications)	3.8.A	FSAR
R11	Refueling, Fuel Handling and	3.8.A	FSAR

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DOC	NAME	CTS SECTIONS	DESTINATION
	Storage (Decay Time)		
R12	Refueling (Manipulator Cranes and Spent Fuel Cask)	3. 8	FSAR
R13	Service Water Isolation Valve Leakage (0.36 GPM Leakage Limit)	4. 4. E. 3	N/A; Retained in ITS 3.6.3.10 & ITS 5.5.15.d
R14	Radioactive Materials Management	3. 9	FSAR
R15	Movable Incore Instrumentation	3. 11	FSAR
R16	River Level (Flooding Protection)	3. 12	TRM
R17	Safety-Related Shock Suppressors (Snubbers)	3. 13 3. 14	TRM
R18	Toxic Gas Monitoring	3. 3. H	TRM
R19	Reactor Coolant System Integrity Testing	4. 3. A. b 4. 3. A. a	FSAR
R20	Seismic Instrumentation	4. 10	TRM

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