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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.3, Primary Containment Isolation Valves		
M.1	Adds a new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability, 3.6.1.3 ACTION F	N/A
M.2	Adds a new Surveillance Requirement that verifies the 18 inch vent and purge valves, except the torus purge valves, are closed every 31 days except during operations which require them to be open (inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, and Surveillances that require the valves to be open).	SR 3.6.1.3.1	N/A
	3.6.1.4, Drywell Pressure		
NONE	NONE	NONE	NONE
	3.6.1.5, Drywell Air Temperature		
M.1	Adds a new Specification requiring drywell average air temperature to be $\leq$150°F during operations in MODES 1, 2, and 3, since the accident analyses of UFSAR, Section 6.2 assumes this temperature as an initial condition in the containment analysis. Appropriate ACTIONS and a Surveillance Requirement are also added.	3.6.1.5, 3.6.1.5 ACTIONS A and B, SR 3.6.1.5.1	N/A
	3.6.1.6, Low Set Relief Valves		
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers		
M.1	Reduces the time to verify that at least one vacuum breaker in the line is closed if it is determined that one vacuum breaker is not closed (otherwise inoperable) from 2 hours to 1 hour, consistent with the Primary Containment Specification, ITS 3.6.1.1.	3.6.1.7 ACTION B	3.7.F Action 2
	3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers		
M.1	CTS 3.7.E Action 1 allows "one or more" of the required suppression chamber-to-drywell vacuum breakers to be inoperable for opening. However, the current accident analysis does not allow two or more vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.C must be entered. Therefore, ITS 3.6.1.8 ACTION A ensures that only one vacuum breaker can be inoperable for opening, and if more than one is inoperable for opening, ITS LCO 3.0.3 will continue to be entered.	3.6.1.8 ACTION A	3.7.E Action 1
	3.6.2.1, Suppression Pool Average Temperature		
M.1	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 150 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the CTS 4.7.K.2.c requirement that the 30 minute temperature verification after a scram is required only with the main steam line isolation valves closed has been deleted, since the temperature verification, (as modified by DOC L.2 of ITS 3.6.2.1) is now required at all times following a scram.	3.6.2.1 ACTION E	3.7.K.2.c, 4.7.K.2.c
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 150 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS D and E	3.7.K.2.b, 3.7.K.2.c, 3.7.K Actions 4 and 5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.2.2, Suppression Pool Water Level		
NONE	NONE	NONE	NONE
	3.6.2.3, Suppression Pool Cooling		
M.1	Adds a specific value for verification of the required LPCI pump flow when in the suppression pool cooling mode, which ensures primary containment peak pressure and temperature can be maintained below the design limits during a DBA.	SR 3.6.2.3.2	4.7.M.2
	3.6.2.4, Suppression Pool Spray		
M.1	Adds a Surveillance Requirement that verifies each suppression pool spray nozzle is unobstructed every 10 years, which ensures that when a suppression pool spray subsystem is required per its design function that it will perform as designed.	SR 3.6.2.4.2	N/A
	3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure		
M.1	The Applicability for CTS 3.7.H ends 24 hours prior to reducing THERMAL POWER to $\leq$ 15% RTP preliminary to a scheduled reactor shutdown. The Applicability for ITS 3.6.2.5 will end 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor shutdown. Thus, the Applicability for ITS 3.6.2.5 lasts slightly longer than the current Applicability (since < 15% RTP is reached slightly after $\leq$ 15% RTP is reached).	3.6.2.5 Applicability	3.7.H Applicability
	3.6.3.1, Primary Containment Oxygen Concentration		
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.4.1, Secondary Containment		
M.1	Requires both subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires that one subsystem be tested every 18 months; however, the same SGT subsystem could be tested at each testing occurrence.	SR 3.6.4.1.3	4.7.N.3
M.2	Adds a Surveillance that requires verifying secondary containment equipment hatches are closed and sealed every 24 months.	SR 3.6.4.1.4	N/A
	3.6.4.2, Secondary Containment Isolation Valves		
M.1	Adds a Surveillance that requires the isolation time of each power operated, automatic SCIV to be verified within limits, which provides assurance that the secondary containment isolation valves will function and the secondary containment will perform as assumed in the safety analyses.	SR 3.6.4.2.2	N/A
M.2	CTS 4.7.N.2.b requires all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions to be closed. This can be met by a single manual valve being closed. CTS 3.7.O requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.7.O does not prescribe limitations on manual valves. ITS LCO 3.6.4.2 requires each SCIV to be OPERABLE and proposed SR 3.6.4.2.1 requires the verification that each secondary containment isolation manual valve and blind flange that is not locked sealed or otherwise secured and is required to be closed during an accident is closed. This provides assurance that the position of all secondary containment isolation valves and blind flanges are properly controlled to ensure design basis assumptions are met.	LCO 3.6.4.2 SR 3.6.4.2.1	4.7.N.2.b
	3.6.4.3, Standby Gas Treatment System		
NONE	NONE	NONE	

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.7, Main Turbine Bypass System		
M.1	Adds ITS 3.7.7, "Main Turbine Bypass System," which will require the Main Turbine Bypass System to be OPERABLE or an MCPR penalty to be applied, to help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting MCPR if the event were to occur.	3.7.7	N/A
	3.7.8, Spent Fuel Storage Pool Water Level		
M.1	The CTS requires the spent fuel water level to be maintained at a level of $\geq$ 33 ft. The ITS requires the spent fuel storage pool water level to be $\geq$ 19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks, which is approximately a 9 inch increase in the water level requirement.	3.7.8	3.10.H
	Current Specification 3/4.8.E, Flood Protection		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.F, Snubbers		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.G, Sealed Source Contamination		
NONE	NONE	NONE	NONE

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

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

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.2, AC Sources - Shutdown		
M.1	Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require them capable of supplying power to necessary electrical power distribution subsystems, if one or more subsystems are not capable of being powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering. To ensure conservative actions, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is also added.	LCO 3.8.2.a, 3.8.2 Required Action A.1	3.9.B.1
M.2	Requires the single unit DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what Division that DG must be associated with.	LCO 3.8.2.b	3.9.B.2
M.3	When a required offsite circuit or a unit DG is inoperable, the actions imposed by CTS 3.9.B Action 2 do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.9.B is not applicable. Therefore, ITS 3.8.2 Required Actions A.2.4 and B.4 are being added, which implement a requirement to immediately initiate action to restore the required power sources to OPERABLE status.	3.8.2 Required Actions A.2.4 and B.4	N/A
	3.8.3, Diesel Fuel Oil and Starting Air		
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.4, DC Sources - Operating		
M.1	Deletes the CTS 4.9.C.6 allowance to replace or restore the battery to 100% or greater of manufacturer's rated capacity during the next refuel outage, for a battery that has shown signs of degradation or reached 85% service life and delivers a capacity of less than 100% of manufacturer's rated, in lieu of performing either a performance discharge test or a modified performance test to verify battery capacity every 12 months.	N/A	4.9.C.6
M.2	Adds an additional DC source to the minimum requirements in CTS 3.9.C for DC Sources - Operating. The requirement was added to ensure the appropriate DC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirement was added as LCO 3.8.4.c. LCO 3.8.4.c will require the opposite unit's 125 VDC electrical power subsystem capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." This added requirement is necessary since safety related equipment is shared between both units. An Action (ITS 3.8.4 ACTION G) has been added, which requires the restoration of the opposite unit's electrical power subsystems to OPERABLE status within 7 days.	LCO 3.8.4.c, 3.8.4 ACTION G	N/A
M.3	Deletes the CTS 4.9.C.2.b and 4.9.C.3.c provisions which allow the battery terminal and connector resistance to be $\leq$ 20% above the baseline connection resistance, in lieu of demonstrating that the measured battery terminal and connector resistance is $\leq 150 \times 10^{-6}$ ohms.	N/A	4.9.C.2.b, 4.9.C.3.c
	3.8.5, DC Sources - Shutdown		
M.1	The existing requirement of CTS 3.9.D for one 250 VDC and one 125 VDC electrical power sources to be operable during shutdown conditons does not specify what components must be powered. The ITS adds a restriction that the source must be capable of supplying power to an associated division of the onsite Class 1E DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems- Shutdown."	LCO 3.8.5	LCO 3.9.D

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	The CTS 3.9.D, "DC Sources — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.5 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.5 ACTIONS Note	N/A
M.3	In the event the necessary DC sources are not OPERABLE, ITS 3.8.5 Required Action A.2.4 is added to commence and continue attempts to restore the necessary DC sources, resulting in an action that does not allow continued operation in the existing plant conditions. This has the effect of not allowing MODE changes per ITS LCO 3.0.4 .	3.8.5 Required Action A.2.4	N/A
3.8.6, Battery Cell Parameters			
M.1	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	3.9.C Actions 4 and 5
M.2	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.9.C-1 footnote (c)
M.3	Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float change following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance.	Table 3.8.6-1 footnote (c)	Table 4.9.C-1 footnote (b)
M.4	Changes the Float Voltage Allowable Value (Category C) from $\geq$ 2.07 volts for each connected cell to > 2.07 volts for each connected cell, consistent with the recommendation identified in IEEE-450-1995, Annex C, C.1 Note.	Table 3.8.6-1 Category C	Table 4.9.C-1 Category B Allowable Value

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.7, Distribution Systems - Operating		
M.1	Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.7.a to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.7.a." CTS does not provide this restriction.	3.8.7 ACTIONS A and B	N/A
M.2	Adds an action that requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems, in combination, results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems.	3.8.7 ACTION E	N/A
M.3	Adds additional AC and DC distribution subsystems have been added to the minimum requirements in CTS 3.9.E for Distribution - Operating. The requirement was added to ensure the appropriate AC and DC distribution subsystems are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.7.b. LCO 3.8.7.b will require the opposite unit's AC and DC electrical power distribution subsystems capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." These added requirements are necessary since safety related equipment is shared between both units. An Action (ITS 3.8.7 ACTION C) has been added, which requires the restoration of the opposite unit's required electrical power distribution subsystems to OPERABLE status within 7 days. In addition, ITS 3.8.7 ACTION C includes a Note to enter applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit.	LCO 3.8.7.b, ACTION C	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.8, Distribution Systems - Shutdown		
M.1	ITS 3.8.8 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. The CTS 3.9.F Action has been modified to be "one or more required" instead of the current "less than," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem.	LCO 3.8.8, 3.8.8 Required Action A.1	LCO 3.9.F, 3.9.F Action
M.2	The CTS 3.9.F, "Distribution — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.8 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.8 ACTIONS Note	N/A
M.3	In the event the necessary Division 1, 2, or 3 electrical power distribution subsystems are not Operable, ITS 3.8.8 Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. ITS 3.8.8 Required Action A.2.5 is also added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.8 ACTIONS are required when shutdown cooling is inoperable.	3.8.8 Required Actions A.2.4 and A.2.5	N/A

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

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

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

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

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

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

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

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

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

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

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

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

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

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 6.13, Process Control Program			
NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor."	1.1 CHANNEL FUNCTIONAL TEST definition	1.0	3
L.2	CTS 1.0 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 VI 56 No 98 May 21, 1991).	1.1 DOSE EQUIVALENT I-131 definition	1.0	3

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

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

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions.	SR 3.0.2	4.0.B	6
L.2	ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.C. The second and third paragraphs of ITS SR 3.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed.	SR 3.0.3	4.0.C	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.1, SHUTDOWN MARGIN			
L.1	Revises the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal" to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality.	3.1.1 ACTION E	3.3.A Action 3	4
L.2	Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.1.1 Required Action E.2	3.3.A Action 3	4
	3.1.2, Reactivity Anomalies			
L.1	Revises the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours.	3.1.2 ACTION A	3.3.B Action	6
L.2	Replaces the term "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity.	SR 3.1.2.1	4.3.B.1	3
L.3	Revises the frequency "31 effective full power days" (approximately 689 MWD/T), with "1000 MWD/T during operations in MODE 1."	SR 3.1.2.1	4.3.B.2	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.3, Control Rod OPERABILITY			
L.1	Revises the requirements for the local distribution of inoperable control rods by 1) adding a Note excluding its applicability above 10% power, 2) deleting actions for inoperable control rods whose position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, even if the inoperable control rods are within two cells of each other, and 3) revising the Completion Time from 1 hour to 4 hours to correct the situation prior to commencing a required shutdown.	3.1.3 ACTION D	3.3.C Actions 1.a and 2.a	4, 6
L.2	Revises the Completion Time from 1 hour to 2 hours to insert the control rod.	3.1.3 Required Action A.2	3.3.C Action 1.a.2)	6
L.3	Revises the requirement which verifies control rods to be non-stuck from 7 days to 31 days for control rods that are not fully withdrawn (proposed SR 3.1.3.3).	SR 3.1.3.3	4.3.C.1.a	3
L.4	Revises the time to demonstrate SHUTDOWN MARGIN from 24 hours to 72 hours to provide a reasonable time to perform the analysis or test.	3.1.3 Required Action A.4	3.3.C Action 1.c, 4.3.A.2	6
L.5	Revises the requirement to 1) extend the time allowed to 3 hours (ITS 3.1.3 Required Action C.1) to complete the insertion of all inoperable non-stuck control rods, and 2) add an additional hour to disarm the associated CRD (ITS 3.1.3 Required Action C.2), 1 hour beyond that allowed to insert in recognition of the potential for excessive haste required to complete this task.	3.1.3 Required Action C.1 and C.2	3.3.C Action 2, 3.3.H Action1, 3.3.I Action 1	6
L.6	Deletes the CTS 3.3.D Action 2 requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time is deleted. In addition, since the shutdown requirement ("with the provisions of the ACTION(s) above not met, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.3.D Action 2 (since a control rod can always be declared inoperable), this part of CTS 3.3.D Action 2 has also been deleted.	N/A	3.3.D Action 2	5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Deletes the coupling requirements during refueling (OPERATIONAL MODE 5) specified by CTS 3/4.3.H since only one control rod can be withdrawn from core cells containing fuel assemblies.	N/A	3/4.3.H	2
L.8	Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed.	3.1.3 Required Actions C.1 and C.2	3.3.H Action 1.b	4
L.9	Deletes the CTS 3.3.H Actions 1.a and 1.a.2) requirements since they are not necessary for ensuring recoupling of the control rod.	N/A	3.3.H Actions 1.a and 1.a.2)	4
L.10	Deletes requirement to verify control rod coupling by observing any individual response on nuclear instrumentation during withdrawal of a control rod. SR 3.1.3.5, which requires verification that a control rod does not go to the withdrawn overtravel position, provides adequate assurance that the control rods are coupled.	N/A	3.3.H Action 1.a.1)	3
L.11	Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE during the performance of the control rod movement tests, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SRs.	N/A	4.3.I.2	3
3.1.4, Control Rod Scram Times				
L.1	Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell.	SR 3.1.4.4	4.3.D.1.a	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.5, Control Rod Scram Accumulators			
L.1	Revises the requirement to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient in lieu of declaring the control rod inoperable. Additionally, with more than one accumulator inoperable, ITS 3.1.5 ACTIONS B and C provide actions similar to ITS 3.1.5 ACTION A, instead of the CTS 3.3.G Action 1.c requirement to declare the associated control rod inoperable immediately.	3.1.5 Required Action A.1, ACTIONS B and C	3.3.G Actions 1.a.2) and 1.c	4
L.2	Revises the requirement to allow 20 minutes to ensure control rod accumulator charging water pressure is adequate to support maintaining the remaining accumulators OPERABLE.	3.1.5 Required Action B.1	3.3.G Action 1.c.1)	4, 6
	3.1.6, Rod Pattern Control			
NONE	NONE	NONE	NONE	NONE
	3.1.7, Standby Liquid Control System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SLC System is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves.	SR 3.1.7.8, SR 3.1.7.9	4.4.A.4.a, 4.4.A.4.c	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.8, SDV Vent and Drain Valves			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal; and open when the actual or simulated scram signal is reset.	SR 3.1.8.3	4.3.K.3	10
	Current Specification 3/4.3.J, Control Rod Drive Housing Support			
L.1	Deletes the requirement for the Control Rod Drive Housing Support to be in place.	N/A	3/4.3.J	1
	Current Specification 3/4.3.N, Economic Generation Control System			
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
L.1	The requirement to verify APLHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. This change allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.1.1	4.11.A.2, 4.11.A.4	3
L.2	Deletes requirement to verify APLHGRs to are within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.A.3	3
	3.2.2, MINIMUM CRITICAL POWER RATIO			
L.1	The requirement to verify MCPR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. This change allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.2.1	4.11.C.2, 4.11.C.4	3
L.2	Deletes requirement to verify MCPR is within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.C.3	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.3, LINEAR HEAT GENERATION RATE			
L.1	The requirement to verify LHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. This change allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.3.1	4.11.D.2, 4.11.D.4	3
L.2	Deletes requirement to verify LHGRs to are within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.D.3	3
	3.2.4, APRM GAIN AND SETPOINT			
L.1	Deletes CTS action requirement to (1) ensure that the adjusted APRM reading does not exceed 100% of RATED THERMAL POWER and (2) post a notice of adjustment on the reactor control panel whenever APRM gain is adjusted so that the APRM readings are greater than or equal to 100% times FRTP times FDLRC.	N/A	3.11.B Action 3 and footnote (a)	4
L.2	The requirement to verify FDLRC within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. This change allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.4.1	4.11.B.2, 4.11.B.4	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.1.1, RPS Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST and the RPS RESPONSE TIME TEST.	SR 3.3.1.1.18, SR 3.3.1.1.19	4.1.A.2, 4.1.A.3	10
LD.2	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch—Shutdown Position Function.	SR 3.3.1.1.16	4.1.A.1 for Table 4.1.A-1 Functional Unit 13	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Functions 1.a, 4, 5, 7.b, 8, and 9	4.1.A.1 for Table 4.1.A-1 Functional Units 1.a, 4, 5, 8.a, 9, and 11	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31366P-A, "General Electric Instrument Setpoint methodology."	Table 3.3.1.1-1	Table 2.2.A-1	1
L.1	Adds an allowance to exclude neutron detectors from the RPS RESPONSE TIME TESTING due to the difficulties of simulating a meaningful signal. The principles of detector operation virtually ensure an instantaneous response time.	SR 3.3.1.1.19 Note 1	N/A	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	Deletes the IRM, APRM, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 (APRM - MODE 3 only). During normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn.	N/A	Tables 3.1.A-1 and 4.1.A-1 Functional Units 1, 2.a, 2.d, 13, and 14, Table 3.1.A-1 Actions 12, 17, and 18	1
L.3	CTS requirements for IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. CTS Action 19, to lock the reactor mode switch in Shutdown, is also deleted. Once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown.	Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H	Tables 3.1.A-1 and 4.1.A-1 Functional Units 1.a, 1.b, 13, and 14, Table 3.1.A-1 Actions 13 and 19	2, 8
L.4	The CTS Scram Discharge Volume Water Level Trip Function Applicability is modified from requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability.	Table 3.3.1.1-1 Functions 7.a and 7.b, including Note (a), 3.3.1.1 ACTION H	Table 3.1.A-1 Functional Units 8.a and 8.b, including footnotes (b) and (i), Table 4.1.A-1 Functional Units 8.a and 8.b, including footnotes (j) and (k), Table 3.1.A-1 Actions 13 and 19	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	The requirement in CTS Table 3.1.A-1 Actions 13 and 19 requiring the suspension of LPRM replacement if SRM instrumentation is not OPERABLE per CTS 3.10.B has been deleted since the ITS Required Actions are adequate to minimize the reactivity of the core whenever required Functions (IRMs, APRMs, Scram Discharge Volume Water Level, Reactor Mode Switch Shutdown Position, and Manual Scram) are inoperable concurrent with SRM inoperabilities.	N/A	Table 3.1.A-1 Actions 13 and 19	4
L.6	The CTS Table 3.1.A-1 Action 16 requirement to initiate a reduction in THERMAL POWER within 15 minutes has been deleted, since immediate power reduction may not always be the conservative method to assure safety.	N/A	Table 3.1.A-1 Action 16	4
L.7	ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER greater than or equal to 25% RTP.	SR 3.3.1.1.2	Table 4.1.A-1 footnote (d)	3
L.8	Relaxation of CHANNEL CALIBRATION Surveillance Frequency for the reactor recirculation flow portion of Functional Unit 2.b, APRM Flow Biased Neutron Flux—High from 184 days to 24 months.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Function 2.b, SR 3.3.1.1.15 Note 3	4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b	3
L.9	Extends the time to reach < 45% RTP from 2 hours to 4 hours.	3.3.1.1 Required Action E.1	Table 3.1.A-1 Action 16	6
L.10	Deletes the response time for the Manual Scram, Reactor Mode Switch Shutdown Position, IRMs, APRM Neutron Flux Setdown, APRM Inop, and Scram Discharge Volume Water Level, since they are not assumed in any accident analysis.	N/A	4.1.A.3 for Table 3.1.A-1 Functional Units 1.a, 1.b, 2.a, 2d, 7.a, 7.b, 11, and 12	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.11	Deletes the requirement to post a notification on the reactor control panel if any required APRM must be adjusted to be within 2% of RATED THERMAL POWER.	N/A	Table 4.1.A-1 footnote (d)	4
3.3.1.2, SRM Instrumentation				
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SRM CHANNEL CALIBRATION.	SR 3.3.1.2.7	4.2.G.4	10
L.1	CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.C) if two or more required SRMs become inoperable. The words "or more" are added (ITS 3.3.1.2 Condition A) to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed.	3.3.1.2 Condition A, 3.3.1.2 ACTION B	N/A	5
L.2	Deletes the CTS requirement to "lock" the mode switch in Shutdown.	N/A	3.2.G Action 2	8
L.3	Deletes the "prior to" frequency from CTS Surveillances involving prior to startup, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.A and CTS 4.0.D .	SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.4	4.2.G.3.a, 4.10.B.2.a, 4.10.B.3.a	3
L.4	The CTS requires verifying SRM count rate is at least 3 cps. The ITS allows SRM count rate to be below 3 cps with less than or equal to four fuel assemblies adjacent to the SRM provided no other fuel assemblies are located in the associated core quadrant.	SR 3.3.1.2.4 Note	4.10.B.3	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	Revises the CTS Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore the ITS provides a Required Action to immediately initiate action and continue attempts to insert all insertable control rods.	3.3.1.2 Required Action E.2	3.10.B Action	4
L.6	Modifies the requirement to fully insert all insertable control rods in MODE 5 if one or more required SRMs are inoperable to only require those control rods in core cell containing one or more fuel assemblies, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.3.1.2 Required Action E.2	3.10.B Action	4
L.7	Adds a Note that eliminates requirements for SRMs outside the fueled region to be Operable in MODE 5, during a spiral offload or reload, since monitors in these positions are not capable of monitoring normal changes in neutron flux. Similarly, SRM count rate requirements are deleted.	Table 3.3.1.2-1 Note (b)	4.10.B.1.c	1
L.8	Modifies the SRM count rate requirement to allow count rate to be as low as 0.7 cps, provided the signal-to-noise ratio is ≥ 20:1. The optional count rate of at least 0.7 cps with a signal to noise ratio ≥ 20:1 is acceptable since the SRMs could still monitor neutron counts with the same confidence as in the current value.	SR 3.3.1.2.4	4.2.G.1, 4.10.B.3	3
3.3.2.1, Control Rod Block Instrumentation				
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31366P-A, "General Electric Instrument Setpoint methodology."	Table 3.3.2.1-1	Table 3.2.E-1	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "within 24 hours prior to startup," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable.	N/A	Table 4.2.E-1 Functional Unit 1 "S/U" and footnote (b)	3
L.2	CTS requirements for RWM Channel Functional Testing are modified. ITS SRs extend the CHANNEL FUNCTIONAL TEST to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM CHANNEL FUNCTIONAL TEST after any control rod is withdrawn at ≤ 10% RTP in MODE 2 and after THERMAL POWER is ≤ 10% RTP in MODE 1.	SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note	4.3.L.2, 4.3.L.3	3
L.3	Deletes CTS Action that requires verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the Surveillance Requirement that requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN.	N/A	3.3.M Action 1.a, 4.3.M.2	3, 4
L.4	Reduces the Applicability for RWM OPERABILITY from ≤ 20% RTP to ≤ 10% RTP.	3.3.2.1, Table 3.3.2.1-1 Function 2, footnote (b)	3.3.L Applicability	2
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.2.2.5	4.2.J.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.2.2.4	4.2.J.1 for Table 4.2.J-1 Functional Unit	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.2.2.4	Table 3.2.J-1	1
L.1	Modifies the Applicability for the Feedwater System and Main Turbine Water Level Trip Instrumentation from MODE 1 to when THERMAL POWER is ≥ 25% RTP, and the current shutdown action to only require power to be reduced to < 25% RTP. In addition, the time to achieve this power level has been reduced from 8 hours to 4 hours.	3.3.2.2 Applicability, 3.3.2.2 ACTION C	3.2.J Applicability, Table 3.2.J-1 Action 90.b	2, 5, 6
L.2	CTS requires reduction in Thermal Power if the Feedwater System Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker.	3.3.2.2 Required Action C.1	N/A	5
3.3.3.1, Post Accident Monitoring Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.3.1.5	4.2.F.1 for Table 4.2.F-1 Instrumentation 2 (analog transmitters only), 5, and 12	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.1.5	4.2.F.1 for Table 4.2.F-1 Instrumentation 2 (analog transmitters only), 5, and 12	10
L.1	Adds a Note that LCO 3.0.4 is not applicable to the ITS 3.3.3.1 ACTIONS.	3.3.3.1 ACTIONS Note 1	N/A	7
L.2	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	3.3.3.1 Surveillance Requirements Note 2	N/A	6
L.3	The CTS Actions for one channel inoperable in one or more Functions for more than the allowed outage time is revised from requiring a shutdown to requiring a Special Report.	3.3.3.1 ACTION B	Table 3.2.F-1 Actions 60.a and 62.a	5
L.4	In the event the number of OPERABLE channels is less than the Minimum Channels OPERABLE requirement, the CTS requires the inoperable channels to be restored within 48 hours. The ITS extends this Completion Time to 7 days.	3.3.3.1 ACTION C	Table 3.2.F-1 Action 60.b	6
L.5	With one or two drywell area radiation monitors inoperable, the CTS requires initiation of the alternate method of monitoring within 72 hours and restoration of both channels to OPERABLE status within 7 days. With one monitor inoperable, the ITS provides 30 days for the restoration of the monitor prior to initiating the action in accordance with Specification 5.6.6 and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating action in accordance with Specification 5.6.6.	3.3.3.1 ACTIONS A, B, C, D, and F	Table 3.2.F-1 Action 61	5, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.6	Changes the Applicability requirement for Drywell Area Radiation Monitors from MODES 1, 2, and 3 to MODES 1 and 2.	3.3.3.1 Applicability	Table 3.2.F-1 and 4.2.F-1 for Instrumentation 12	2
3.3.4.1, ATWS-RPT Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.4.1.5	4.2.C.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.1.4	4.2.C.1 for Table 4.2.C-1 Functional Units 1 and 2	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.4.1.4	Table 3.2.C-1	1
L.1	CTS require the unit to be in Mode 2 if the ATWS-RPT instrumentation is not restored. ITS will allow removal of the associated recirculation pump from service in lieu of being in MODE 2 within 6 hours.	3.3.4.1 Required Action D.1	N/A	5
L.2	When two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability and providing the required initiation capability of the instrumentation.	3.3.4.1 ACTION A	3.2.C Action 3	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore trip capability when one Function has lost ATWS-RPT trip capability and a 1 hour Completion Time when both Functions have lost ATWS-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS- RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. ITS extends the time for repair to 14 days when either the pressure or level functions are inoperable in one trip system provided the other trip system retains trip capability.	3.3.4.1 ACTIONS B and C	3.2.C Actions 5 and 6	1, 6
3.3.5.1, ECCS Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for HPCI Manual Initiation and ADS Initiation Timer and Low Low Water Level Actuation Timer Functions.	SR 3.3.5.1.6	4.2.B.2, 4.2.B.1 for Table 4.2.B-1 Functional Units 3.g, 4.c, and 4.d	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.1.5	4.2.B.1 for Table 4.2.B-1 Functional Units 1.a, 1.d, 2.a, 2.d, 3.a, 3.c, 3.e, 4.a, 4.c, and 4.d	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.5.1-1	Table 3.2.B-1	1
L.1	CTS Table 3.2.B-1 Action 32, which applies to Functional Units 1.c and 2.c (Reactor Vessel Pressure-Low (Permissive) Functions) in MODES 4 and 5, requires the channels to be placed in the tripped condition within 24 hours. If this Action is not performed, CTS 3.2.B does not provide default actions, thus CTS 3.0.C appears to be applicable. However, CTS 3.0.C does not apply in MODES 4 and 5, therefore 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72 and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In the ITS an alternate action has been added to declare the associated supported subsystems inoperable. In this condition, the ITS will require the associated supported subsystems to be declared inoperable immediately.	3.3.5.1 ACTION H	Table 3.2.B-1 Action 32 for Functional Units 1.c and 2.c	4
	3.3.5.2, IC System Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.5.2.4	4.2.D.2	10
LE.1	Relaxation of Surveillance Frequency from 92 days to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.2.3	4.2.D.1 for Table 4.2.D-1	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.5.2.2	Table 3.2.D-1	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.3.6.1, Primary Containment Isolation Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for MSL Tunnel Temperature—High, SLC System Initiation, and HPCI Area Temperature—High Functions.	SR 3.3.6.1.5, SR 3.3.6.1.7	4.2.A.2, 4.2.A.1 for Table 4.2.A-1 Functional Units 3.e, 4.a, and 6.c	10
LE.1	Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.1.6	4.2.A.1 for Table 4.2.A-1 Functional Units 1.a, 1.c, 3.a, 3c, 3.e, 4.b, 6.a, 6.b, 6.c, 7.a, and 7.b	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.1-1	Table 3.2.A-1	1
L.1	CTS Table 3.2.A-1 Action 23 requires the affected system isolation valves to be closed within one hour. If this action were not met entry into CTS 3.0.C is required and the plant must within one hour take action to place the unit in a MODE in which the Specification does not apply by placing the plant in MODE 3 in the next 12 hours, and be in at least MODE 4 within the subsequent 24 hours. In lieu of a CTS 3.0.C shutdown, the ITS provides a shutdown to MODE 4 within the Primary Containment Isolation Instrumentation Specification.	3.3.6.1 ACTION G	CTS 3.0.C	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	The Applicability of the SLC System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements. In addition, the ITS allows the associated SLC subsystem to be declared inoperable in lieu of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped.	Table 3.3.6.1-1 Function 5.a, 3.3.6.1 ACTION H	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 4.a, Table 3.2.A-1 Action 23	2, 4
L.3	The CTS action, associated with the Reactor Vessel Water Level—Low Function, to close the affected system isolation valves within one hour and declare the affected system inoperable has been modified to immediately initiate action to restore channel to OPERABLE status or initiate action to isolate the Shutdown Cooling System.	3.3.6.1 ACTION I	Table 3.2.A-1 Action 23	5
L.4	CTS Table 3.2.A-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 8 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 8 hours to12 hours to allow for more orderly power reduction.	3.3.6.1 ACTION D	Table 3.2.A-1 Action 21	5, 6
L.5	The Shutdown Cooling System isolations on low water level in MODES 4 and 5 are provided to mitigate a vessel draindown event. However, in MODES 4 and 5 an intact Shutdown Cooling System fulfills the function of redundant capability of isolation instrumentation. Therefore, in the ITS, only one channel per trip system, with an isolation signal available to one shutdown cooling suction isolation valve, is required provided system integrity is maintained.	Table 3.3.6.1-1 Note (b)	Table 3.2.A-1 Functional Unit 7.a	1
3.3.6.2, Secondary Containment Isolation Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.6.2.6	4.2.A.2, 4.7.P.4.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.2.5	4.2.A.1 for Table 4.2.A-1 Functional Unit 2.a	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.2-1	Table 3.2.A-1	1
L.1	Isolation of secondary containment on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS.	N/A	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote *	2
L.2	ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.C entry would be required, since no further Actions are provided.	3.3.6.2 Required Actions C.1.2 and C.2.2	Table 3.2.A-1 Action 24	4, 5
3.3.6.3, Relief Valve Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION (for the Low Set Relief Valve Reactuation Time Delay Function only).	SR 3.3.6.3.3	4.6.F.1.b, 4.6.F.1.a	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.3.2	4.6.F.1.b for the Low Set Relief Valve Reactuation Time Delay Function	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.3-1	3.6.F	1
3.3.7.1, CREV System Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.8.1.3, SR 3.3.8.1.5	4.2.B.1 for Table 4.2.B-1 Functional Unit 5.a, 4.2.B.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.1.4	4.2.B.1 for Table 4.2.B-1 Functional Unit 5.a	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.8.1-1	Table 3.2.B-1	1
3.3.8.2, RPS Electric Power Monitoring				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test.	SR 3.3.8.2.3	4.9.G.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.2.2	4.9.G.2	10
LF.1	Revises the Current Technical Specifications (CTS) setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.8.2.2	4.9.G.2.a, 4.9.G.2.b, 4.9.G.2.c	1
L.1	Changes the Applicability from MODES 1, 2, and 3 and MODES 4 and 5 with any control rod withdrawn to only include MODES 1 and 2 and MODE 5 with any control rod withdrawn, consistent with the Applicability of the RPS Instrumentation, which is the equipment required to be protected by the RPS Electric Power Monitoring Assemblies. In addition, modifies CTS 4.9.G footnote (b) to require performance of the Channel Functional Test Surveillance prior to entry into MODE 2, consistent with the change to the Applicability.	3.3.8.2 Applicability, SR 3.3.8.2.1 Note	3.9.G Applicability, 4.9.G footnote (b)	2
L.2	Extends the allowed out of service time for two inoperable RPS electric power monitoring assemblies from 30 minutes to 1 hour to provide sufficient time for plant personnel to take corrective actions.	3.3.8.2 Required Action B.1	3.9.G Action 2	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY		CTS SECTION	CHANGE TYPE
L.3	The CTS Applicability is modified from requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	3.3.8.2 Applicability	3.9.G footnote (a)	2
L.4	The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG set or alternate power supply is not removed from service (which de-energizes the associated RPS bus). Thus, CTS 3.0.C is required to be entered. However, since CTS 3.0.C is not applicable in MODE 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In lieu of these two requirements, the ITS provides a new ACTION if the Required Actions of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. The ITS requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	3.3.8.2 ACTION D	N/A	5
Current Specification 3/4.2.H, Explosive Gas Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.1, Recirculation Loops Operating			
L.1	Deletes the explicit requirement in CTS 3.6.A Action 1.e to electrically prohibit the idle recirculation pump from starting except to permit testing in preparation for returning the pump to service.	N/A	3.6.A Action 1.e	4
L.2	Replaces the required action of CTS 3.6.C Action 2 to trip one of the recirculation pumps when the speed mismatch (i.e. flow mismatch) is not within limits with a requirement (ITS 3.4.1 ACTION B) to declare the loop with the low flow "not in operation." Once the declaration has been made, the appropriate actions for single loop operation must be taken in accordance with CTS 3.6.A.1 (ITS 3.4.1).	3.4.1 ACTION B	3.6.C Action 2	4
L.3	CTS 4.6.C requires the recirculation pump speed mismatch (i.e., jet pump loop flow mismatch in ITS) to be verified within the limits once per 24 hours when in Operational MODES 1 and 2 during two recirculation loop operation. Since CTS 4.6.C cannot be performed prior to its Applicability (as required by CTS 4.0.D) if shifting from single loop to two loop operation while in MODE 1 or 2, a note is added providing an allowance for time to initiate Frequency to avoid intentional entry into the ACTIONS each time the second recirculation pump is started.	SR 3.4.1.1 Note	N/A	3
L.4	CTS 3.6.C requires the recirculation pump speeds to be maintained within prescribed limits. With THERMAL POWER $\geq$ 80% of RATED THERMAL POWER the recirculation pump speeds must be within 10% of each other, and with THERMAL POWER < 80% of RATED THERMAL POWER, recirculation pump speeds must be within 15% of each other. In proposed SR 3.4.1.1, the jet pump loop flow mismatch with both recirculation loops in operation is: $\leq$ 10% of rated core flow when operating at < 70% of rated core flow; and $\leq$ 5% of rated core flow when operating at $\geq$ 70% of rated core flow. The required loop mismatch criteria has been changed from a recirculation pump speed comparison to a core flow comparison. In addition, the cutoff point for the criteria is with respect to total core flow instead of thermal power level. The proposed mismatch tolerance is actually smaller than in CTS at high pump speeds and larger than in CTS at lower pump speeds, therefore the change is considered less restrictive.	SR 3.4.1.1	3.6.C	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.2, Jet Pumps			
L.1	Deletes the requirements of CTS 3.6.B and associated Action 2 concerning jet pump flow indication since it does not necessarily relate directly to the structural integrity of the jet pumps.	N/A	3.6.B, 3.6.B Action 2	1, 4
L.2	Adds a Note to CTS 4.6.B.1 and CTS 4.6.B.2 (proposed SR 3.4.2.1 Note 1), to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation. The Note allows the Surveillance not to be performed until four hours after the associated recirculation loop is in operation, because these checks can only be performed during jet pump operation (i.e., when the loop is in operation).	SR 3.4.2.1 Note 1	N/A	3
	3.4.3, Safety and Relief Valves			
L.1	Deletes the requirement of CTS 3.6.F Action 1 for an open relief valve to be closed provided the suppression pool temperature is <110°F. If unable to close the open relief valve, or if suppression pool temperature is ≥ 110°F, the reactor mode switch must be placed in shutdown.	N/A	3.6.F Action 1	4
	3.4.4, RCS Operational Leakage			
L.1	Extends the Surveillance Frequency for verifying the RCS operational leakage is within limits from "8 hours not to exceed 12 hours" to "12 hours."	SR 3.4.4.1	4.6.H.2	3
	3.4.5, RCS Leakage Detection Instrumentation			
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.6, RCS Specific Activity			
NONE	NONE	NONE	NONE	NONE
	3.4.7, Shutdown Cooling System - Hot Shutdown			
L.1	Adds Notes making LCO 3.0.4 and SR 3.0.4 not applicable to provide the necessary time to place the system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed in service until the suction valves high pressure closure interlock is cleared.	3.4.7 ACTION Note 1, SR 3.4.7.1 Note	N/A	7
L.2	CTS 3.6.O footnote (a) allows one shutdown cooling (SDC) loop to be inoperable for 2 hours provided the other loop is OPERABLE and in operation. CTS 3.6.O footnote (b) allows the shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements are changed to delete the "provided" requirements.	LCO 3.4.7 Notes 1 and 2	3.6.O footnotes (a) and (b)	1
	3.4.8, Shutdown Cooling System - Cold Shutdown			
L.1	CTS 3.6.P footnote (a) allows one SDC loop to be inoperable for 2 hours provided the other loop is OPERABLE and in operation. CTS 3.6.P footnote (b) allows the SDC pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements are changed to delete the "provided" requirements.	LCO 3.4.8 Notes 1 and 2	3.6.P footnotes (a) and (b)	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.9, RCS Pressure and Temperature (P/T) Limits			
L.1	CTS 4.6.K.2.a requires the rate of change of primary system coolant temperature to be determined within limits 15 minutes prior to withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown. The requirement to verify the rate of change during the 15 minute period prior to withdrawal of control rods has been deleted, however, the Frequency of once every 30 minutes has been retained as proposed in SR 3.4.9.1 during heatup and cooldown.	N/A	4.6.K.2.a	3
L.2	CTS 3.6.K Action 2 and the CTS 3.6.D Action specify a Completion Time of 72 hours for the required engineering evaluation with an LCO applicability of "at all times." Proposed ITS 3.4.9, Required Action C.2, (applicable when in conditions other than MODES 1, 2, and 3) requires completion "prior to entering MODE 2 or 3." While Required Action C.2 is intended to be initiated without delay, it is not restricted to a specified Completion Time, only by a restriction on returning to (entering) operating MODES (i.e., 1, 2, or 3) where additional stresses (heatup/criticality) may be imposed.	3.4.9 Required Action C.2	3.6.K Action 2, 3.6.D Action	6
	3.4.10, Reactor Steam Dome Pressure			
NONE	NONE	NONE	NONE	NONE
	Current Specification 3/4.6.N, Structural Integrity			
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.1, ECCS-Operating			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification of HPCI system flow, verification that ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; and manually opening each required ADS valve.	SR 3.5.1.7, SR 3.5.1.8, SR 3.5.1.9, SR 3.5.1.10	4.5.A.3.a, 4.5.A.3.b.1), 4.5.A.3.b.2), 4.5.A.4.a, 4.5.A.4.b	10
L.1	Reduces the number of ADS valves required to be OPERABLE in CTS 3.5.A.4 from five to four based on the analysis summarized in the UFSAR.	LCO 3.5.1	3.5.A.4, 4.5.A.4.b	1
L.2	Deletes the ECCS discharge line keep fill alarm instrumentation, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	3.5.A Action 5, 4.5.A.3.c	3, 4
L.3	Adds ITS 3.5.1 ACTION G for the condition of HPCI inoperable coincident with one low pressure coolant injection/spray subsystem (or one LPCI pump in each subsystem) inoperable. The CTS require entry into Specification 3.0.C (ITS LCO 3.0.3) for these conditions, implying that the plant is outside design basis. The analyses summarized in the UFSAR demonstrate that adequate core cooling is provided by the OPERABLE ADS and the remaining OPERABLE low pressure injection/spray systems.	3.5.1 ACTION G	N/A	5
L.4	Elimination of the requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv).	N/A	3.5.A Action 7	9
	3.5.2, ECCS-Shutdown			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that verifies the CS and LPCI functional test on an actual or simulated automatic initiation signal.	SR 3.5.2.5	4.5.B	10

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.3, IC System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that provides an IC system functional test.	SR 3.5.3.3	4.5.D.3	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.1, Primary Containment			
LD.1	Relaxation of routine Surveillance Frequency from 18 months to 24 months and relaxation of additional tests required if routine test fails two times in a row from 9 months to 12 months for performing the drywell-to-suppression chamber bypass leakage test.	SR 3.6.1.1.2	4.7.K.5	10
L.1	In the ITS presentation, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment being inoperable.	3.6.1.1 ACTION A	3.0.C	6
L.2	Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rate test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specification.	N/A	4.7.K.5	9
L.3	Not used.	N/A	N/A	N/A
	3.6.1.2, Primary Containment Air Lock			
L.1	Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases.	3.6.1.2 ACTIONS Note 1	3.7.C Actions	4
L.2	Not used.	N/A	N/A	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Adds ITS Required Action Notes to allow administrative means to be used to verify a locked closed OPERABLE air lock door in high radiation areas or areas with limited access due to inerting.	3.6.1.2 Required Actions A.3 and B.3 Notes	3.7.C Actions	4
L.4	CTS 3.7.C Action 1 footnote (b) limits the time an inoperable primary containment air lock door can be used to facilitate the removal of personnel for a cumulative time not to exceed one hour per year. The ITS does not include a cumulative time period per year to limit entry and exit into the primary containment with one inoperable air lock door, however, the use of the air lock will be limited to an explicit time period for any single entry into the Condition as long as administrative controls are imposed. ITS 3.6.1.2 Required Action A Note 2 is added to the Technical Specifications to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for 7 days under administrative controls. The new allowance is proposed to have strict administrative controls, which are detailed in the Bases.	3.6.1.2 Required Action A Note 2	3.7.C Action 1 footnote (b)	4
L.5	Change the Frequency for the air lock interlock test from once per 6 months only upon entry into the primary containment air lock when primary containment is de-inerted, to 24 months.	SR 3.6.1.2.2	4.7.C.2 including footnote (e)	3
L.6	Deletes requirement to have one air lock door "locked" closed at all times.	N/A	3.7.C Action 2	4
3.6.1.3, Primary Containment Isolation Valves				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the automatic PCIV actuation test, EFCV actuation test, and TIP squib valve initiation test.	SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9	4.7.D.2, 4.7.D.4, 4.7.D.5.b	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	CTS 3.7.D Action 1 requires an inoperable PCIV (except for MSIVs and reactor building-suppression chamber vacuum breakers) to be restored or the affected penetration isolated in 4 hours. The ITS allows 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose system piping communicates with the suppression pool and is expected to remain submerged during the accident (i.e., a closed system as defined in the UFSAR), and only one PCIV.	3.6.1.3 Required Action C.1	3.7.D Action 1	6
L.2	The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices.	3.6.1.3 ACTIONS A, B, and C	3.7.D Action 1.c, 3.6.M Action	4
L.3	In the event two or more valves in a penetration are inoperable, CTS 3.7.D Action 1 and the CTS 3.6.M Action, which require maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable.	3.6.1.3 ACTION B	3.7.D Action 1, 3.6.M Action	6
L.4	Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.7.D and Action 1 footnote (a).	3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2, SR 3.6.1.3.3	3.7.D and Action 1 footnote (a)	1, 4
L.5	Deletes CTS 4.7.D.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.D.1	3
L.6	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each PCIV actuates on an automatic isolation "test" signal.	SR 3.6.1.3.7	4.7.D.2	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Deletes the requirement that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated instrument line break signal.	SR 3.6.1.3.8	4.7.D.4	3
L.8	Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument.	3.6.1.3 Required Action C.1	3.7.D Action 2	6
L.9	The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	SR 3.6.1.3.2, SR 3.6.1.3.3	4.7.A.2, including footnote (b)	3
L.10	Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means, regardless of whether or not the isolation devices are inside the primary containment. In addition, adds a Note to allow verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means.	3.6.1.3 Note 1 to Required Actions A.2 and C.2, SR 3.6.1.3.2, 3.6.1.3 Note 2 to Required Actions A.2 and C.2	4.7.A.2 footnote (b)	3, 4
3.6.1.4, Drywell Pressure				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.1.5, Drywell Air Temperature				
DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves				
L.1	Deletes the CTS requirement to place the reactor mode switch in shutdown if unable to close the open relief valve or if suppression pool temperature is $\geq$ 110°F, since Required Action D.1 of ITS 3.6.2.1 will also require that the reactor mode switch be immediately placed in shutdown if the suppression pool average temperature is $\geq$ 110°F.	N/A	3.6.F Action 1	5
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is $\leq$ 0.5 psid.	SR 3.6.1.7.3	4.7.F.2.b.1)	10
L.1	Adds an ACTION to allow two lines to have all vacuum breakers inoperable for opening for up to one hour without requiring a shutdown, as is currently required by CTS 3.0.C. In addition, add ITS ACTIONS Note, "Separate Condition entry is allowed for each line, " to provide proper direction for inoperable vacuum breakers.	3.6.1.7 ACTION D, 3.6.1.7 ACTIONS Note	3.0.C	6
L.2	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.F Action 3, 4.7.F.2.a.2), 4.7.F.2.b.2)	1, 3, 4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.7.1	4.7.F.1	3
L.4	Adds a Note to the Surveillance to allow vacuum breakers to be open during the performance of required Surveillances.	SR 3.6.1.7.1, Note 1	4.7.F.1	3
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.5 psid.	SR 3.6.1.8.3	4.7.E.2.c.1)	10
L.1	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.E Action 3, 4.7.E.2.b, 4.7.E.2.c.2), 4.7.E.2.c.3)	1, 3, 4
L.2	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.8.1	4.7.E.1	3
L.3	Adds a Note stating that the vacuum breakers can be opened when performing required Surveillances. CTS requires that the vacuum breakers be closed at all times; with no allowance for opening during performances of required Surveillances.	SR 3.6.1.8.1 Note 1	4.7.E.1	3
3.6.2.1, Suppression Pool Average Temperature				
L.1	Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one low pressure coolant injection loop in the suppression pool cooling mode).	N/A	3.7.K Action 4	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	When the suppression pool temperature is > 95°F but ≤ 110°F, the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is > 95°F and ≤ 110°F, and power is > 1% RTP, ITS requires verification of suppression pool temperature once per hour in this condition. If < 1% RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient.	3.6.2.1 Required Action A.1, SR 3.6.2.1.1	4.7.K.2.c, 4.7.K.2.b.2)	3, 6
3.6.2.2, Suppression Pool Water Level				
L.1	Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits.	3.6.2.2 Required Action A.1	3.7.K Action 1, 3.5.C Action 1	6
3.6.2.3, Suppression Pool Cooling				
L.1	Adds a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable. Currently, no time is provided; CTS 3.7.M Action 2 requires a unit shutdown.	3.6.2.3 ACTION B	3.7.M Action 2	6
3.6.2.4, Suppression Pool Spray				
NONE	NONE	NONE	NONE	NONE
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure				
L.1	Deletes the drywell-suppression chamber differential pressure instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.H Actions 2, 3, and 4, 4.7.H.2	1, 3, 4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.3.1, Primary Containment Oxygen Concentration				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing CTS 4.7.N.3, which ensures that the Secondary Containment is OPERABLE.	SR 3.6.4.1.3	4.7.N.3	10
3.6.4.2, Secondary Containment Isolation Valves				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal.	SR 3.6.4.2.3	4.7.O.2	10
L.1	Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves, other than those currently allowed to be opened using CTS 4.7.N, footnote (a) (locked or sealed-closed penetrations).	3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2	4.7.N footnote (a)	1
L.2	In the event both dampers in a penetration are inoperable in an open penetration, the CTS 3.7.O Action, which requires maintaining one isolation damper OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable.	3.6.4.2 ACTION B	3.7.O Action	6

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes CTS 4.7.O.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.O.1	3
L.4	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance Requirement that verifies each SCIV actuates on an automatic isolation "test" signal.	SR 3.6.4.2.3	4.7.O.2	3
L.5	The requirements related to verification of the position of secondary containment isolation penetrations not capable of being closed by OPERABLE secondary containment isolation valves (SCIVs), are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	3.6.4.2 Required Action A.2 Note 2, SR 3.6.4.2.1	4.7.N.2.b	3, 4
3.6.4.3, Standby Gas Treatment System				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each SGT subsystem actuates on an actual or simulated automatic initiation signal.	SR 3.6.4.3.3	4.7.P.4.b	10
L.1	The CTS requires suspending operations if an SGT subsystem cannot be returned to OPERABLE status within 7 days, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. As an alternative, the ITS will allow the OPERABLE SGT subsystem to be placed in operation and continue to conduct operations (e.g., OPDRVs).	3.6.4.3 Required Action C.1	3.7.P Action 1.b	4
L.2	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies each subsystem actuates on an automatic initiation "test" signal.	SR 3.6.4.3.3	4.7.P.4.b	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.1, Containment Cooling Service Water System			
L.1	Extends the out of service time for one CCSW subsystem inoperable for reasons other than one inoperable pump from 72 hours to 7 days.	3.7.1 ACTION C	3.8.A Action 1.c	6
	3.7.2, Diesel Generator Cooling Water System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the DGCW automatic start Surveillance.	SR 3.7.2.2	4.8.B.2	10
L.1	Adds the phrase "actual or simulated" in reference to the actuation test signal that verifies that each DGCW subsystem pump starts.	SR 3.7.2.2	4.8.B.2	3
	3.7.3, Ultimate Heat Sink			
NONE	NONE	NONE	NONE	NONE
	3.7.4, Control Room Emergency Ventilation System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV System isolation and operation Surveillances.	SR 3.7.4.3, SR 3.7.4.4	4.8.D.5.b, 4.8.D.5.c	10
	3.7.5, Control Room Emergency Ventilation Air Conditioning System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV Air Conditioning System operation Surveillance.	SR 3.7.5.1	4.8.D.1	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.6, Main Condenser Offgas			
L.1	Extends the time allowed to close the main steam isolation valves from 8 hours to 12 hours. Also deletes the explicit requirement to be in STARTUP since the closure of all main steam line isolation valves will require the mode switch to be placed in the startup/hot standby position to avoid a scram on Main Steam Line Isolation Valve— Closure.	3.7.6 ACTION B	3.8.I Action	5, 6
L.2	Adds new Required Actions that require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours, which exits the new Applicability of the LCO.	3.7.6 Required Actions B.3.1 and B.3.2	N/A	5
L.3	CTS 4.8.I.2.b requires the main condenser offgas activity to be determined within 4 hours following the determination of an increase of 50%. The ITS requires the performance of this Surveillance at the same Frequency, however it is modified to allow factoring out increases in activity as a result of a THERMAL POWER increase.	SR 3.7.6.1	4.8.I.2.b	3
L.4	Adds a finite time limit to allow the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation.	SR 3.7.6.1 Note	4.8.I.2 footnote (b)	3
	3.7.7, Main Turbine Bypass System			
NONE	NONE	NONE	NONE	NONE
	3.7.8, Spent Fuel Storage Pool Water Level			
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.8.E, Flood Protection				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.F, Snubbers				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.1, AC Sources - Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following AC sources related Surveillance Requirements: offsite circuit transfer test; single load reject test; full load reject test; LOOP test; LOCA test; automatic trip bypass test; 24 hour run test; hot restart test; DG synchronization shutdown test; load block interval test; and LOCA/LOOP test.	SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18	4.9.A.1.b, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g, 4.9.A.8.h, 4.9.A.8.j, 4.9.A.8.k	10
L.1	In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "14 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3 and B.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss.	3.8.1 Required Actions A.3 and B.4	3.9.A Actions 1.b, 2.c, 3.d, 5.b, 6.d	6
L.2	Deletes the CTS requirement to complete the diesel start test for failures that are potentially generic regardless of when the inoperable diesel is restored to operable status.	N/A	3.9.A Action 2.b footnote (b)	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	CTS 3.9.A Action 2.b requires a verification within 24 hours and every 72 hours thereafter that the cause of a DG inoperability does not affect the remaining DGs. CTS 3.9.A Action 3.b requires a verification within 8 hours and every 72 hours thereafter, the that the cause of a DG inoperability does not affect the remaining DGs. In both Actions, the initial evaluation or test is not required if a test was performed in the past 24 hours. In addition, when two DGs are inoperable, CTS 3.9.A Action 6.c requires the performance of CTS 4.9.A.2.c (DG slow start) within the subsequent 72 hours after a DG is restored to service. ITS 3.8.1 Required Actions B.3.1 and B.3.2 will continue to require this verification, but will allow 24 hours to perform the verification, and there will be no requirement to re-test the OPERABILITY of the OPERABLE DG.	3.8.1 Required Actions B.3.1 and B.3.2	3.9.A Actions 2.b, 3.b, and 6.c	6
L.4	The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification Operability requirements and is removed from the Technical Specifications.	LCO 3.8.1	4.9.A.2.e	3
L.5	CTS 4.9.A.3 requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each operation of the diesel where the period of operation was greater than or equal to 1 hour." ITS SR 3.8.1.5 only requires the check every 31 days; the frequency of "after each operation of the diesel where the period of operation was greater than or equal to 1 hour" has been deleted.	SR 3.8.1.5	4.9.A.3	3
L.6	The Completion Time to verify that required systems, subsystems, trains, components, and devices powered from the redundant DG(s) are OPERABLE has been extended from 2 hours to 4 hours.	3.8.1 Required Action B.2	3.9.A Actions 4.a and 6.b	6
L.7	For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained.	SR 3.8.1.8, SR 3.8.1.13	4.9.A.7, 4.9.A.8.e	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.8	The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, and 4.9.A.8.g for verifying the proper response of the DG. This allows satisfactory loss of offsite power or ECCS actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. OPERABILITY is adequately demonstrated in either case since the DG cannot discriminate between "actual" or "simulated" signals.	SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14	4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g	3
L.9	The manner in which the DG is started for CTS 4.9.A.8.h (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS.	SR 3.8.1.15	4.9.A.8.h	3
L.10	Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.9.A.9 (i.e., after any modifications which could affect DG interdependence).	N/A	4.9.A.9	3
L.11	CTS 4.9.A.9 requires the DGs to accelerate to 900 rpm in $\leq$ 13 seconds. For these DGs, 900 rpm is equivalent to a frequency of 60 Hz. The ITS will require the minimum frequency to be 58.8 Hz, as shown in ITS SR 3.8.1.20, since the accident analysis requires the DG to be capable of being loaded within 13 seconds (this can be accomplished at 58.8 Hz).	SR 3.8.1.20	4.9.A.9	3
L.12	The load range requirements of CTS 4.9.A.2.d, CTS 4.9.A.8.c, and CTS 4.9.A.8.h (the 22-hour load requirements only) have been relaxed slightly to provide margin to the DG's continuous rating. The new load range in ITS SRs 3.8.1.3, 3.8.1.11, and 3.8.1.15 is 90% to 100% of the continuous rating (2340 kW to 2600 kW).	SR 3.8.1.3, SR 3.8.1.11, SR 3.8.1.15	4.9.A.2.d, 4.9.A.8.c, 4.9.A.8.h	3
L.13	Deletes CTS 4.9.A.8, footnote (d), which restricts the performance of CTS 4.9.A.8.c, the DG full load rejection test, and CTS 4.9.A.8.h, the DG 24 hour endurance run, to only one DG at a time.	N/A	4.9.A.8 footnote (d)	3
L.14	Deletes CTS 4.9.A.8.k upper load block limit, such that the interval between each load block is only required to be $\geq$90% of the design load interval.	SR 3.8.1.18	4.9.A.8.k	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.2, AC Sources - Shutdown			
L.1	In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO.	SR 3.8.2.1 Note 1	4.9.B	3
L.2	CTS 4.9.B, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.9.A to be performed. Two of the Surveillances of CTS 4.9.A are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable.	SR 3.8.2.1 Note 2	4.9.B	3
L.3	An alternative is proposed in the ITS to suspending the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.2 Required Action A.1	3.9.B Action 1	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.3, Diesel Fuel Oil and Starting Air			
L.1	CTS 3.9.A Action 7 provides a 7 day restoration period for the new fuel oil parameters tested by CTS 4.9.A.5 when they are found not within specified limits. In addition, CTS 3.9.B provides no restoration time when the fuel oil parameters are not within the limits of CTS 4.9.A.5 and 4.9.A.6 in MODES 4 and 5 and when handling irradiated fuel in the secondary containment. ITS 3.8.3 ACTION B will allow 30 days to restore new fuel properties to within the specified limits. If not restored, ITS 3.8.3 ACTION D is provided to declare the DG inoperable. In addition, a 7 day time has been provided in ITS 3.8.3 ACTION A to restore stored fuel oil total particulates to within limits when in MODE 4 or 5, or when handling irradiated fuel in the secondary containment.	3.8.3 ACTIONS A, B, and D	3.9.A Actions, 3.9.B Actions	6
L.2	The diesel starting air parameter, while supporting DG OPERABILITY, contain substantial margin in addition to the limit which would be absolutely necessary for DG OPERABILITY. Therefore, a certain level of degradation in this parameter is justified to extend the allowance for restoration (presented as ITS 3.8.3 ACTION C and ACTIONS Note). During the extended restoration period for this parameter, the DG would still be capable of performing its intended function. ACTION C allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION D is provided to declare the DG inoperable if the previous ACTION is not met. During the proposed extended period for restoration of this parameter, the DG would still be capable of performing its intended function.	3.8.3 ACTIONS Note, 3.8.3 ACTIONS C and D	3.9.A Actions, 3.9.B Actions	6
	3.8.4, DC Sources - Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following Surveillances: Visual inspection of battery for physical damage or abnormal deterioration; verification that cell-to-cell and terminal connections are free of corrosion; inter-cell and terminal connection resistance checks; battery charger test; and battery service test.	SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7, SR 3.8.4.8	4.9.C.3, 4.9.C.4	10

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Removes from CTS 4.9.C.2 the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is < 150 $X10^{-6}$ ohm or 20% above baseline connection resistance.	N/A	4.9.C.2	3
L.2	CTS 4.9.C.3.b requires the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of ITS SR 3.8.4.6, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries.	SR 3.8.4.6	4.9.C.3.b	3
	3.8.5, DC Sources - Shutdown			
L.1	Three of the DC sources Surveillances required to be performed by CTS 4.9.D (CTS 4.9.C.4, 4.9.C.5, and 4.9.C.6) involve tests that would cause the only required OPERABLE unit 250V battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, ITS SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE 250V DC battery to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO.	SR 3.8.5.1 Note	N/A	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.2	An alternative is proposed in the ITS to suspending operations if a DC Source is inoperable, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.5 Required Action A.1	3.9.D Action	4
3.8.6, Battery Cell Parameters				
L.1	Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 65°F within 7 days after a battery discharge or overcharge.	N/A	4.9.C.2	3
L.2	Changes the CTS 4.9.C.2.c requirement, which requires measurement of the temperature for all connected cells every 92 days, to only require representative cells (10% of the total, as defined in the Bases) be verified within limits every 92 days.	SR 3.8.6.3	4.9.C.2.c	3
L.3	The time specified in CTS 3.9.C Actions 4 and 5 to restore Category A and B battery cell parameters to within limits has been extended from the next 6 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days.	3.8.6 Required Actions A.2 and A.3	3.9.C Actions 4 and 5	6
L.4	Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge.	Table 3.8.6-1 footnote (a)	Table 4.9.C-1	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.5	CTS 4.9.D requires the batteries and chargers to be demonstrated OPERABLE per the Surveillance Requirements of CTS 4.9.C. The CTS 4.9.C requirements include battery cell parameter Surveillances. However, the CTS 3.9.D Action does not provide any specific actions for when battery cell parameters are exceeding the limits in CTS 4.9.C. Therefore, the associated DC electrical power sources must be declared inoperable and the Action of CTS 3.9.D must be taken immediately. In lieu of taking the CTS 3.9.D Action immediately, ITS 3.8.6 ACTION A will provide time to restore the Category A and B battery cell parameters prior to declaring the associated DC power source inoperable and taking the Action of CTS 3.9.D (ITS 3.8.5 ACTION A). ITS 3.8.6 ACTION B will require the associated battery to be declared inoperable (thus requiring ACTION A of ITS 3.8.5 to be taken) if ACTION A is not met, if the Category C battery cell parameters are not met, or if the electrolyte temperature is not within the limit.	3.8.6 ACTIONS A and B	3.9.D Action	6
	3.8.7, Distribution Systems - Operating			
L.1	CTS 3.9.E Action 1 allows 8 hours to restore one inoperable AC subsystem and CTS 3.9.E Action 2 allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.C. ITS 3.8.7 ACTIONS A and B allow one "or more" AC and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.7 ACTION E is also added to require that if two or more electrical power distribution subsystems are inoperable and, in combination, result in a loss of function, then ITS 3.0.3 must be entered immediately.	3.8.7 ACTIONS A, B, and E	3.9.E Actions 1 and 2	6

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	
	3.8.8, Distribution Systems - Shutdown			
L.1	An alternative is proposed in the ITS to suspending the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC or DC distribution subsystem(s) are OPERABLE. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.8 Required Action A.1	3.9.F Action	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.1, Refueling Equipment Interlocks			
L.1	Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency of CTS 4.10.A.2 (proposed SR 3.9.1.1) for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY.	N/A	4.10.A.2	3
L.2	Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATION(s) following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.A.3	3
L.3	Adds actions to allow a control rod block to be inserted and to verify all control rods are fully inserted in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable.	3.9.1 Required Actions A.2.1 and A.2.2	N/A	4
	3.9.2, Refuel Position One-Rod-Out Interlock			
L.1	Deletes the requirement to "lock" the mode switch in Shutdown.	N/A	3.10.A, 3.10.A Action 1, 4.10.A.1	8
L.2	Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS requires CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel.	3.9.2 Required Actions A.1 and A.2	3.10.A Actions 1 and 2	5

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.10.A.1.b "within 2 hours prior" and CTS 4.10.A.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY.	N/A	4.10.A.1.b, 4.10.A.2	3
L.4	Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance.	SR 3.9.2.2 Note	N/A	7
L.5	Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.A.3	3
	3.9.3, Control Rod Position			
L.1	Revises the Applicability that all control rods be fully inserted in Operational MODE 5 during CORE ALTERATIONS to "when loading fuel assemblies into the core," since the intent is to establish the requirement that all control rods are inserted only in those situations that could add positive reactivity but are not covered by other Technical Specifications. In addition, the Actions have been revised consistent with the change in Applicability.	3.9.3, 3.9.3 ACTION A	3.10.C, 3.10.C Action	2, 4
L.2	Deletes the requirement to perform CTS 4.10.C.2 "within 2 hours prior to the start of" Core Alterations since the normal 12 hour periodic Surveillance Frequency to verify the control rods are inserted provides adequate assurance of OPERABILITY.	N/A	4.10.C.2	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.4, Control Rod Position Indication			
L.1	Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is proposed to be required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, that the full-out indicator functions during rod coupling checks, and the full-in position indication checks prior to each reactor startup and each time a control rod is fully inserted, have been deleted.	LCO 3.9.4, SR 3.9.4.1	3.3.I, 3.3.I Action 3, 4.3.I.1, 4.3.I.2	1, 3
	3.9.5, Control Rod OPERABILITY - Refueling			
NONE	NONE	NONE	NONE	NONE
	3.9.6, RPV Water Level - Irradiated Fuel			
L.1	Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.10.G	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.7, RPV Water Level - New Fuel or Control Rods				
L.1	Splits current Specification 3.10.G, which provides reactor vessel water level requirements during handling of fuel assemblies and control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange as is in CTS 3.10.G.	LCO 3.9.7	3.10.G	1
L.2	Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.10.G	3
3.9.8, Shutdown Cooling (SDC) - High Water Level				
NONE	NONE	NONE	NONE	NONE
3.9.9, Shutdown Cooling (SDC) - Low Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.E, Communications				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.10.1, Reactor Mode Switch Interlock Testing			
L.1	ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted.	3.10.1	Table 1-2 footnote (a), 4.10.A.2 and 4.10.A.3 footnote (d)	1
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown			
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel.	N/A	3.10.A, 4.10.A.1	8
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown			
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.I.1, 4.10.I.1, 3.10.A, 3.10.A.1	1, 8
L.2	For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in ITS 3.10.3 in place of the SHUTDOWN MARGIN and control rod five-by-five array disarming requirements. The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring, and LCO 3.9.5, Control Rod OPERABILITY — Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement.	LCO 3.10.3.b.2, LCO 3.10.3.c.1, SR 3.10.3.1, SR 3.10.3.4	N/A	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.I	3
3.10.4, Single Control Rod Drive Removal - Refueling				
L.1	Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.I.1, 4.10.I.1	1, 8
L.2	Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.I	3
3.10.5, Multiple Control Rod Withdrawal - Refueling				
L.1	The requirement "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.J.1, 4.10.J.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.10.J "Within 4 hours prior to the start of removal of control rods and/or control rod drive mechanisms from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.J.1	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.10.J, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.J.2	3
3.10.6, Control Rod Testing - Operating				
L.1	Adds Special Operations Technical Specification to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing. The requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA).	3.10.6	N/A	1
3.10.7, SDM Test - Refueling				
L.1	Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test.	SR 3.10.7.2, SR 3.10.7.4	4.12.B	3
Current Specification 3/4.12.A, Primary Containment Integrity				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation				
NONE	NONE	NONE	NONE	NONE

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
5.1, Responsibility				
NONE	NONE	NONE	NONE	NONE
5.2, Organization				
L.1	Deletes the requirement for an SRO to be present in the control room while the unit is in MODE 4.	N/A	6.2.B.2	1
5.3, Unit Staff Qualifications				
NONE	NONE	NONE	NONE	NONE
5.4, Procedures				
NONE	NONE	NONE	NONE	NONE
5.5, Programs and Manuals				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirement establishing a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels.	5.5.2.b	6.8.D.1.b	10

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

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

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 6.4, Training				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program				
NONE	NONE	NONE	NONE	NONE

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

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
1.0-LA.1	1.0	Moves the definition of FRACTION OF RATED POWER (FRTP) and TRANSIENT LINEAR HEAT GENERATION RATE (TLHGR) to ITS 3.2.4 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1
1.0-LA.2	1.0	Moves the definition of STEADY STATE LINEAR HEAT GENERATION RATE (SLHGR) to ITS 3.2.3 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1
1.0-LA.3	1.0	Moves items a, b, c, and f from the PRIMARY CONTAINMENT INTEGRITY definition to the ITS 3.6.1.1 Bases and items b and e from the CTS SECONDARY CONTAINMENT INTEGRITY definition to the ITS 3.6.4.1 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN					
3.1.1-LA.1	4.3.A.1, 4.3.A.3	The details of the methods to determine SHUTDOWN MARGIN (SDM).	Bases	Bases Control Program in ITS Chapter 5	3
3.1.2, Reactivity Anomalies					
3.1.2-LA.1	3.3.B Action	The requirement to perform an analysis to determine and explain the cause of the reactivity difference.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.3, Control Rod OPERABILITY					
3.1.3-LA.1	3.3.C Actions 1.a.2), 2.b, and 2.c, 3.3.H Action 1.b, 3.3.I Action 1.c	The details of the recommended procedures for disarming control rod drives.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.3-LA.2	3.3.I Actions 1.a and 1.b	Details of methods for determining the position of a control rod.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.4, Control Rod Scram Times					
3.1.4-LA.1	4.3.D.3	ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS requirement of "10% of the control rods on a rotating basis". The details of what constitutes a representative sample are relocated.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.5, Control Rod Scram Accumulators					
NONE	NONE	NONE	NONE	NONE	NONE
3.1.6, Rod Pattern Control					
NONE	NONE	NONE	NONE	NONE	NONE
3.1.7, Standby Liquid Control System					
3.1.7-LA.1	4.4.A.2.b	The details of the method for performing the Surveillance to determine boron concentration is within limits (by a chemical analysis).	Bases	Bases Control Program in ITS Chapter 5	3
3.1.7-LA.2	4.4.A.4.a	The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.8, SDV Vent and Drain Valves					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.J, Control Rod Drive Housing Support					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA- REMOVAL OF DETAILS MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE					
3.2.1-LA.1	3.11.A Action 1	The requirement in the CTS 3.11.A Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.2.2, MINIMUM CRITICAL POWER RATIO					
3.2.2-LA.1	3.11.C Action 1	The requirement in the CTS 3.11.C Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
3.2.3, LINEAR HEAT GENERATION RATE					
3.2.3-LA.1	3.11.D Action 1	The requirement in the CTS 3.11.D Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA- REMOVAL OF DETAILS MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.4, APRM GAIN AND SETPOINT					
3.2.4-LA.1	3.11.B Action	The requirement in the CTS 3.11.B Action to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.1, RPS Instrumentation					
3.3.1.1-LA.1	3.1.A Action footnotes a and b	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur, tripping trip system with the most inoperable channels).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.2	Table 3.1.A-1 footnote (e)	The LPRM inputs for OPERABILITY of the APRM (2 per level; 50% of the LPRM inputs to each required APRM).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.3	4.1.A-1 footnote (b)	Details of the methods for performing CTS 4.1.A.1, the IRM and APRM CHANNEL CHECK (½ decade overlap).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.4	Table 2.2.A-1 footnote (a)	The detail of system description for the APRM Flow-Biased Neutron Flux—High scram Allowable Value (the definition of W, the recirculation loop drive flow).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.1.1-LA.5	Table 2.2.A-1 footnote (b)	The details in concerning the Allowable Value of the Reactor Vessel Water Level—Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
3.3.1.2, SRM Instrumentation					
3.3.1.2-LA.1	4.2.G.1	The detail of the method for performing the Surveillance ("with the detector fully inserted").	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.2-LA.2	3.10.B, 3.10.B.1, 4.10.B.1	The details relating to SRM OPERABILITY; i.e., that the SRMs shall be inserted to the normal operating level with continuous indication in the control room.	Bases	Bases Control Program in ITS Chapter 5	1, 2
3.3.1.2-LA.3	3.10.B Applicability	The additional spatial limitations when movable detectors are being used.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.2.1, Control Rod Block Instrumentation					
3.3.2.1-LA.1	Table 3.2.E-1 footnote (a)	The statement that the RBM shall be automatically bypassed when a peripheral control rod is selected.	UFSAR	10 CFR 50.59	1
3.3.2.1-LA.2	Table 4.2.E-1 Functional Unit 1, footnote (c), 4.3.L.2.a, 4.3.L.2.b	Details of the methods for performing Surveillances (i.e., the RBM CFT includes the reactor manual control "relay select matrix" system input and the RWM CFT includes verifying correct indication of the selection error of at least one out-of-sequence control rod and verifying the rod block function).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation					
3.3.2.2-LA.1	Table 3.2.J-1 footnote (a)	The detail concerning the Allowable Value for the Reactor Vessel Water Level — High Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.3.1, Post Accident Monitoring Instrumentation					
3.3.3.1-LA.1	Table 3.2.F-1 Action 61	The use of alternate methods of monitoring (initiate the preplanned alternate method of monitoring the parameters).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.3.1-LA.2	Table 4.2.F-1 footnote (a)	The detail of the method for performing the CHANNEL CALIBRATION of the Drywell Radiation Monitors.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.3.1-LA.3	Table 3.2.F-1 (including footnote (a)) and 4.2.F-1 Instrumentation 13	The Torus Pressure Function because it is shared with drywell pressure functions which are retained in ITS.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.4.1, ATWS-RPT Instrumentation					
3.3.4.1-LA.1	3.2.C Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.4.1-LA.2	Table 3.2.C-1 footnote (c)	The detail concerning the Allowable Value for the Reactor Vessel Water Level — Low Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
3.3.5.1, ECCS Instrumentation					
3.3.5.1-LA.1	Table 3.2.B-1 footnote (h), Table 3.2.B-1 Functional Unit 3.d	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero) and the detail that the Allowable Value for the HPCI Suppression Chamber Water Level - High Function is referenced above the bottom of the chamber.	UFSAR	10 CFR 50.59	1
3.3.5.1-LA.2	Table 3.2.B-1 footnote (i)	The detail relating to system design (e.g., valves associated with isolation signals).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.5.2, IC System Instrumentation					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.1, Primary Containment Isolation Instrumentation					
3.3.6.1-LA.1	3.2.A Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.1-LA.2	Table 3.2.A-1 footnote (i)	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
3.3.6.1-LA.3	Table 3.2.A-1 footnote (f)	The detail in CTS that the Standby Liquid Control System Initiation Function channel closes only reactor water cleanup system isolation valves	Bases	Bases Control Program in ITS Chapter 5	1
3.3.6.2, Secondary Containment Isolation Instrumentation					
3.3.6.2-LA.1	3.2.A Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.2-LA.2	Table 3.2.A-1 footnote (i)	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.2-LA.3	Tables 3.2.A-1 and 4.2.A-1 footnote (c)	Details relating to system design (i.e., specific valves and systems affected).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.6.2-LA.4	4.7.P.4.b. 2)	The details in CTS 4.7.P.4.b.2 relating to methods for performing the LOGIC SYSTEM FUNCTIONAL TEST (use of simulated signals).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.3, Relief Valve Instrumentation					
NONE	NONE	NONE	NONE	NONE	NONE
3.3.7.1, CREV System Instrumentation					
NONE	NONE	NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation					
3.3.8.1-LA.1	Table 3.2.B-1 Functiona l Unit 6.a	The detail relating to the methods (on decreasing voltage) for determining the 4160 V ESS Bus Undervoltage (Loss of Voltage) Allowable Value.	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION		
3.3.8.2, RPS Electric Power Monitoring					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.H, Explosive Gas Monitoring					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.1, Recirculation Loops Operating					
3.4.1-LA.1	3.6.A Action 1.b	The details of the actual MCPR correction factor for the MCPR operating limit for single loop operation ("0.01").	COLR	COLR change control process described in Chapter 5 of the ITS	3
3.4.1-LA.2	4.6.A	The details relating to the recirculation pump MG set scoop tube stop settings.	TRM	10 CFR 50.59	1
3.4.1-LA.3	3.6.A Action 2	The requirement to "immediately initiate measures to place the unit in at least STARTUP" when no recirculation loops are in operation is relocated in the form of a discussion that "action must be taken as soon as practicable" to be in MODE 2.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.2, Jet Pumps					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.3, Safety and Relief Valves					
3.4.3-LA.1	3.6.E footnote (a)	The details relating to lift setting pressure of the safety valves (the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures).	Bases	Bases Control Program in ITS Chapter 5	1
3.4.3-LA.2	3.6.F footnote (a)	The detail indicating that one of the relief valves is a "Target Rock" combination safety relief valve.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.3-LA.3	4.6.E.2	The requirements for safety valve setting verification demonstrating the Reactor Coolant System (RCS) safety valves are OPERABLE.	IST Program	IST Program in ITS Chapter 5	3
3.4.4, RCS Operational Leakage					
3.4.4-LA.1	4.6.H.2	Details of the method for performing the reactor coolant system leakage Surveillance (by determining the primary containment sump flow rate).	Bases	Bases Control Program in ITS Chapter 5	3
3.4.5, RCS Leakage Detection Instrumentation					
3.4.5-LA.1	4.6.G.2	The detail of what Drywell Floor Drain Sump Monitoring System instrumentation (pump discharge flow integrator) is subject to a CHANNEL CALIBRATION.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.6, RCS Specific Activity					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.7, Shutdown Cooling System - Hot Shutdown					
3.4.7-LA.1	3.6.O.1, 3.6.O.2	The details of what constitutes an OPERABLE SDC subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.7-LA.2	4.6.O	The detail of the method of verifying operation of the SDC subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
3.4.8, Shutdown Cooling System - Cold Shutdown					
3.4.8-LA.1	3.6.P.1, 3.6.P.2	The details of what constitutes an OPERABLE SDC subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	1
3.4.8-LA.2	4.6.P	The detail of the method of verifying operation of the SDC subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
3.4.9, RCS Pressure and Temperature (P/T) Limits					
3.4.9-LA.1	3.6.K Action 2	The detail to perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.9-LA.2	3.6.D Action, 4.6.D	The details relating to operational limits (loop flow) during a return to two recirculation pump operation from single recirculation loop operation.	UFSAR	10 CFR 50.59	1
3.4.10, Reactor Steam Dome Pressure					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.6.N, Structural Integrity					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.5.1, ECCS-Operating					
3.5.1-LA.1	3.5.A	The details relating to ECCS subsystem OPERABILITY (i.e., number of pumps and flow paths capable of taking suction from the suppression chamber and transferring water to the reactor vessel).	Bases	Bases Control Program in ITS Chapter 5	1
3.5.1-LA.2	4.5.A.1.a. 2) footnote (a)	The details relating to what "correct position" means for an automatic valve.	Bases	Bases Control Program in ITS Chapter 5	3
3.5.1-LA.3	4.5.A.1.b, 4.5.A.3.b. 1), 4.5.A.3.b. 2), 4.5.A.4.b	The details relating to methods for performing Surveillances (i.e., the minimum pressure to perform the low pressure HPCI flow test, verifying the HPCI System pump flow controller is in the correct position, verifying the HPCI suction is automatically transferred from the contaminated condensate storage tank to the suppression pool on the proper signals, and verifying proper operation of the ADS valves).	Bases	Bases Control Program in ITS Chapter 5	2, 3
3.5.2, ECCS-Shutdown					
3.5.2-LA.1	3/4.5.B, 3.5.C.2	The details of CTS 3/4.5.B relating to system OPERABILITY (in this case what constitutes an OPERABLE ECCS subsystem) and CTS 3.5.C.2 (reference for suppression chamber level).	Bases	Bases Control Program in ITS Chapter 5	1
3.5.3, IC System					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.1, Primary Containment					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock					
3.6.1.2-LA.1	3.7.C Action 2	The purpose as to why an individual is dedicated to ensure the necessary administrative controls during entry and exit of personnel through an air lock with an inoperable air lock interlock mechanism are followed (i.e., "to assure that both air lock doors are not opened simultaneously").	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3, Primary Containment Isolation Valves					
3.6.1.3-LA.1	4.7.D.3	The requirement to stroke time test the power operated, non-automatic, PCIVs.	IST Program	10 CFR 50.59 and 10 CFR 50.55a	3
3.6.1.3-LA.2	4.7.D.5.b	Requirements in CTS 4.7.D.5.b concerning the replacement charges for the traversing in-core probe (TIP) explosive valves (i.e., replacement charge shall be from the same batch or from another batch that has had one charge fired, and no charge shall remain in use past its shelf-life and operating-life).	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3-LA.3	4.7.D.6	The details that the main steam isolation valve leakage is on a maximum pathway leakage basis and is tested "in accordance with the methods" of the Primary Containment Leakage Rate Testing Program.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.4, Drywell Pressure					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers					
3.6.1.7-LA.1	3.7.F	The detail comprising what "OPERABLE" means (i.e, closed).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers					
3.6.1.8-LA.1	4.7.E.2.c. 1)	The detail that the opening setpoint is verified from the closed position.	Bases	Bases Control Program in ITS Chapter 5	3
3.6.2.1, Suppression Pool Average Temperature					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.2.2, Suppression Pool Water Level					
3.6.2.2-LA.1	3.5.C.1	The detail that the suppression pool level limit is referenced from the bottom of the suppression chamber .	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.3, Suppression Pool Cooling					
3.6.2.3-LA.1	3.7.M	The details relating to system OPERABILITY (in this case the suppression pool cooling function is designated as two "independent" subsystems, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.4, Suppression Pool Spray					
3.6.2.4-LA.1	3.7.L	The details relating to system OPERABILITY (in this case the suppression pool spray function is designated as two "independent" subsystems, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure					
3.6.2.5-LA.1	3.7.H footnote (a)	The detail that defines the types of required Surveillances ("which reduces the differential pressure") where the drywell-to-suppression chamber differential pressure can be outside of limits for 4 hours.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.3.1, Primary Containment Oxygen Concentration					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.2, Secondary Containment Isolation Valves					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.3, Standby Gas Treatment System					
3.6.4.3-LA.1	3.7.P	The detail relating to system design (i.e., that the SGT subsystems are "independent")	Bases	Bases Control Program in ITS Chapter 5	1
3.6.4.3-LA.2	4.7.P.1, 4.7.P.4.b. 1	Details of the methods for performing the standby gas treatment subsystem 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers) and the current manual actuation test requirement (verifying "Manual initiation from the control room").	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.1, Containment Cooling Service Water System					
3.7.1-LA.1	3.8.A	The details relating to system OPERABILITY (that the CCSW subsystems shall be independent and that each subsystem shall have two CCSW pumps capable of taking suction from the ultimate heat sink and transferring the water to the associated LPCI heat exchanger and separately to the associated safety related equipment).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.1-LA.2	3/4.8.A	LCO requirements, Actions, and Surveillance Requirements for the CCSW System when in MODES 4 and 5 and when handling irradiated fuel in the secondary containment, CORE ALTERATIONS, and OPDRVs.	TRM	10 CFR 50.59	3
3.7.2, Diesel Generator Cooling Water System					
3.7.2-LA.1	3.8.B	The details relating to system OPERABILITY (that each DGCW subsystem shall have one OPERABLE DGCW pump, and an OPERABLE flow path capable of taking suction from the ultimate heat sink and transferring water to the associated diesel generator).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.2-LA.2	3/4.8.B	LCO requirements, Actions, and Surveillance Requirements for the DGCW System when in MODES or conditions other than MODE 1, 2, or 3. Due to this change, the Applicability has been modified to be "MODES 1, 2, and 3," consistent with the DG Applicability requirements in ITS 3.8.1.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.2-LA.3	4.8.B.2	The detail concerning the specific start signal (start signal for the associated DG) to be used during the surveillance.	Bases	Bases Control Program in ITS Chapter 5	3
3.7.3, Ultimate Heat Sink					
3.7.3-LA.1	3.8.C	LCO requirements, Actions, and Surveillance Requirements for the Ultimate Heat Sink when in MODES or conditions other than MODE 1, 2, or 3.	TRM	10 CFR 50.59	3
3.7.4, Control Room Emergency Ventilation System					
3.7.4-LA.1	3.8.D	The details of what constitutes the Control Room Emergency Ventilation System (i.e, an Operable control room emergency filtration system).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.4-LA.2	4.8.D.2, 4.8.D.5.b	Details of the methods for performing the CREV System 31 day operating Surveillance and system actuation test (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and by verifying the filter train starts and isolation dampers close on manual initiation from the control room).	Bases	Bases Control Program in ITS Chapter 5	3
3.7.5, Control Room Emergency Ventilation Air Conditioning System					
3.7.5-LA.1	3.8.D	The details of what constitutes the Control Room Emergency Ventilation Air Conditioning System (i.e, an Operable refrigeration control unit).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.6, Main Condenser Offgas					
3.7.6-LA.1	4.8.I.1	The requirement to continuously monitor radioactivity rate of noble gases from the main condenser air ejector.	ODCM	ODCM Control Process in ITS Chapter 5	3
3.7.6-LA.2	4.8.I.2	Details defining the method for performing this Surveillance (i.e., performing an isotopic analysis of a representative sample of gases taken at the recombiner outlet, or the air ejector outlet, if the recombiner is bypassed).	Bases	Bases Control Program in ITS Chapter 5	3
3.7.7, Main Turbine Bypass System					
NONE	NONE	NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level					
3.7.8-LA.1	3.10.H Action	The requirement to suspend crane operations with loads in the spent fuel storage pool area when the spent fuel storage pool water level is not within the limit.	UFSAR	10 CFR 50.59	3
3.7.8-LA.2	3.10.H Action	Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3
Current Specification 3/4.8.E, Flood Protection					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.8.F, Snubbers					
None-LA.1	3/4.8.F	Snubber inspection and testing requirements.	TRM	10 CFR 50.59	3
Current Specification 3/4.8.G, Sealed Source Contamination					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.1, AC Sources - Operating					
3.8.1-LA.1	LCO 3.9.A.1, LCO 3.9.A.2, LCO 3.9.A.2.c	The details relating to system design and OPERABILITY (i.e., that the offsite circuits are "physically independent," the DGs are "separate and independent," and that each DG has "a separate fuel transfer pump").	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.2	4.9.A.8.b	The specific kilowatt value of the single largest post-accident load for the single load rejection Surveillance Requirement (increased to the proper value).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.3	N/A	Not used.	N/A	N/A	N/A
3.8.1-LA.4	4.9.A.8.i	The specific load value for the auto-connected loads.	UFSAR	10 CFR 50.59	1
3.8.2, AC Sources - Shutdown					
3.8.2-LA.1	LCO 3.9.B.2.c	The detail relating to system design and OPERABILITY (i.e., that each DG has a fuel oil transfer pump).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.2-LA.2	3.9.B Action 1.d	Requirements to suspend crane operations over the spent fuel storage pool if fuel assemblies are stored therein when an AC Source is inoperable	UFSAR	10 CFR 50.59	3
3.8.3, Diesel Fuel Oil and Starting Air					
3.8.3-LA.1	4.9.A.10	The 10 year requirement to drain, remove sediment, and clean each fuel tank.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.4, DC Sources - Operating					
3.8.4-LA.1	LCO 3.9.C.1, LCO 3.9.C.2	Details relating to system OPERABILITY (what constitutes a DC Source division).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.4-LA.2	4.9.C footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.4-LA.3	4.9.C.4	The details of the method (actual or simulated) to perform the battery service test).	Bases	Bases Control Program in ITS Chapter 5	3
3.8.4-LA.4	4.9.C.6	Specific limits on battery degradation and guidance regarding the intent of the term "degradation."	Bases	Bases Control Program in ITS Chapter 5	3
3.8.5, DC Sources - Shutdown					
3.8.5-LA.1	LCO 3.9.D.1, LCO 3.9.D.2	Details relating to system OPERABILITY (what constitutes a required DC electrical power source.	Bases	Bases Control Program in ITS Chapter 5	1
3.8.5-LA.2	4.9.D footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.6, Battery Cell Parameters					
3.8.6-LA.1	4.9.C footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.7, Distribution Systems - Operating					
3.8.7-LA.1	LCO 3.9.E, LCO 3.9.E.1, LCO 3.9.E.2, LCO 3.9.E.3, LCO 3.9.E.4, 3.9.E Actions 1 and 2	The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.8, Distribution Systems - Shutdown					
3.8.8-LA.1	LCO 3.9.F, LCO 3.9.F.1, LCO 3.9.F.2, LCO 3.9.F.3, 3.9.F Action	The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.1, Refueling Equipment Interlocks					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.2, Refuel Position One-Rod-Out Interlock					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.3, Control Rod Position					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.4, Control Rod Position Indication					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.5, Control Rod OPERABILITY - Refueling					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.6, RPV Water Level - Irradiated Fuel					
3.9.6-LA.1	3.10.G Action	Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.7, RPV Water Level - New Fuel or Control Rods					
3.9.7-LA.1	3.10.G Action	Details of the methods for suspending movement of fuel assemblies and control rods (after placing the fuel assemblies and control rods in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.8, Shutdown Cooling (SDC) - High Water Level					
3.9.8-LA.1	3.10.K.1, 3.10.K.2	The details of what constitutes an OPERABLE shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.8-LA.2	4.10.K	The detail of the method of verifying operation of the shutdown cooling subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.9, Shutdown Cooling (SDC) - Low Water Level					
3.9.9-LA.1	3.10.L.1, 3.10.L.2	The details of what constitutes an OPERABLE shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.9-LA.2	4.10.L	The detail of the method of verifying operation of the shutdown cooling subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 3/4.10.E, Communications					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.1, Reactor Mode Switch Interlock Testing					
3.10.1-LA.1	Table 1-2 footnote (a), 4.10.A.2, 4.10.A.3	The method used to verify control rods remain fully inserted (by verification using a second licensed operator or other technically qualified member of the unit technical staff).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.2, Single Control Rod Withdrawal - Hot Shutdown					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.3, Single Control Rod Withdrawal - Cold Shutdown					
3.10.3-LA.1	3.10.I.4.a, 4.10.I.4.a	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.4, Single Control Rod Drive Removal - Refueling					
3.10.4-LA.1	3.10.I.4.a, 4.10.I.4.a	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

3.10.5, Multiple Control Rod Withdrawal - Refueling					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.6, Control Rod Testing - Operating					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.A, Primary Containment Integrity					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
4.0-LA.1	5.1.A	The description of the site location.	UFSAR	10 CFR 50.59	1
4.0-LA.2	5.2.A, 5.2.B, 5.2.C	Primary containment configuration and design details, primary containment design temperatures and pressures, and secondary containment design details.	UFSAR	10 CFR 50.59	1
4.0-LA.3	5.3.B	The nominal active control rod assembly absorber length.	UFSAR	10 CFR 50.59	1

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.1, Responsibility					
5.1-LA.1	6.1.A	Replaces the specific title "Station Manager" with the generic title "station manager" and relocates the specific title.	QA Manual	10 CFR 50.54	3
5.1-LA.2	6.1.B	The requirement that delineates the responsibility of the Shift Manager for directing and commanding the overall operations of the facility on shift.	UFSAR	10 CFR 50.59	3
5.2, Organization					
5.2-LA.1	6.2.A.2, 6.2.A.3, 6.2.B.6, 6.2.C	Replaces the specific title "Chief Nuclear Officer" with the generic term "a corporate officer." Replaces the specific title "Station Manager" with the generic title "station manager." Replaces the specific titles "Operations Manager" and "Shift Operations Supervisor" with the generic titles "operations manager" and "shift operations supervisor." Replaces the specific title, "Unit Supervisor" with "shift manager." The specific titles are relocated. In addition, the person to whom the STA provides advisory technical support will be changed to the shift manager instead of the unit supervisor. This portion is considered administrative.	QA Manual	10 CFR 50.54	3
5.2-LA.2	6.2.B.5	The details with respect to the development and implementation of procedures to limit the working hours of facility staff who perform safety-related functions.	UFSAR	10 CFR 50.59	3
5.2-LA.3	6.2.B.2	The details concerning the location of operators and senior operator.	UFSAR	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.3, Unit Staff Qualifications					
5.3-LA.1	6.3	Replaces the specific titles "Radiation Protection Manager" with the generic titles "radiation protection manager." The specific titles are relocated.	QA Manual	10 CFR 50.54	3
5.4, Procedures					
5.4-LA.1	6.8.A.5	The requirement that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained.	UFSAR	10 CFR 50.59	3
5.5, Programs and Manuals					
5.5-LA.1	6.8.D.2	The details contained in CTS 6.8.D.2, "In-Plant Radiation Monitoring."	UFSAR	10 CFR 50.59	3
5.5-LA.2	4.0.E	Details of the Inservice Inspection (ISI) Program are relocated; and since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity.	ISI Program	10 CFR 50.55a	3
5.5-LA.3	4.0.E	Details of the Inservice Testing Program.	IST Program	10 CFR 50.55a	3
5.5-LA.4	4.7.P.2.b, 4.7.P.3, 4.8.D.3.b, 4.8.D.4	The details for implementing the Standby Gas Treatment (SGT) System and the Control Room Emergency Ventilation (CREV) System ventilation filter testing requirements.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.5-LA.5	3.8.H, 3.8.J	The details for implementing the liquid holdup tank and explosive gas mixture requirements.	TRM	10 CFR 50.59	3
5.5-LA.6	6.14.A.2	Replaces the specific title "Station Manager" with the generic title "station manager." The specific title is relocated.	QA Manual	10 CFR 50.54	3
5.5-LA.7	6.8.D.1	Details of the Reactor Coolant Sources Outside Primary Containment Program.	UFSAR	10 CFR 50.59	3
5.6, Reporting Requirements					
5.6-LA.1	6.9.A.6.a. (4)	The details associated with the MCPR Specification (i.e.,scram insertion times, rated and off-rated flow conditions).	Bases	Bases Control Program in ITS Chapter 5	1
5.6-LA.2	6.9.A.6.b	The details of the actual topical reports document date, revision number, volume, supplement, and company.	COLR	COLR change control process in ITS Chapter 5	1
5.7, High Radiation Area					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 6.4, Training					
None-LA.1	6.4	The details on training and replacement training of station personnel.	UFSAR	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 6.7, Safety Limit Violation					
None-LA.1	6.7.A.1	The requirement for notification of the Site Vice President or designated alternate.	QA Manual	10 CFR 50.54	3
Current Specification 6.11, Radiation Protection Program					
None-LA.1	6.11	The details on Radiation Protection Program procedures.	UFSAR	10 CFR 50.59	3
Current Specification 6.13, Process Control Program					
None-LA.1	6.13	The details contained in the Process Control Program Specification and the definition of PROCESS CONTROL PROGRAM.	UFSAR	10 CFR 50.59	3

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements and relocated specification requirements.

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.1.1, SHUTDOWN MARGIN				
NONE	NONE	NONE	NONE	NONE
3.1.2, Reactivity Anomalies				
NONE	NONE	NONE	NONE	NONE
3.1.3, Control Rod OPERABILITY				
NONE	NONE	NONE	NONE	NONE
3.1.4, Control Rod Scram Times				
NONE	NONE	NONE	NONE	NONE
3.1.5, Control Rod Scram Accumulators				
NONE	NONE	NONE	NONE	NONE
3.1.6, Rod Pattern Control				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.1.7, Standby Liquid Control System				
NONE	NONE	NONE	NONE	NONE
3.1.8, SDV Vent and Drain Valves				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.J, Control Rod Drive Housing Support				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System				
None-R.1	3/4.3.N	The Economic Generation Control System requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO				
NONE	NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.4, APRM GAIN AND SETPOINT				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.1.1, RPS Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.1.2, SRM Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.2.1, Control Rod Block Instrumentation				
3.3.2.1-R.1	Tables 3.2.E-1 and 4.2.E-1 Functional Units 2, 3, 4, and 5	The APRM, SRM, IRM, and Scram Discharge Volume control rod blocks.	TRM	10 CFR 50.59
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	
3.3.3.1, Post Accident Monitoring Instrumentation				
3.3.3.1-R.1	Tables 3.2.F-1 and 4.2.F-1 Instrumentation 7, 10, and 11	Drywell Air Temperature, Safety Relief Valve Position Indicators, and Source Range Neutron Monitors.	TRM	10 CFR 50.59
3.3.4.1, ATWS-RPT Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.5.1, ECCS Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.5.2, IC System Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.6.1, Primary Containment Isolation Instrumentation				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	
3.3.6.2, Secondary Containment Isolation Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.6.3, Relief Valve Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.7.1, CREV System Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.8.2, RPS Electric Power Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.H, Explosive Gas Monitoring				
None-R.1	3/4.2.H	Explosive Gas Monitoring Instrumentation requirements.	TRM	10 CFR 50.59
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation				
None-R.1	3/4.2.I	Suppression Chamber and Drywell Spray Actuation Instrumentation requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.4.1, Recirculation Loops Operating				
NONE	NONE	NONE	NONE	NONE
3.4.2, Jet Pumps				
NONE	NONE	NONE	NONE	NONE
3.4.3, Safety and Relief Valves				
NONE	NONE	NONE	NONE	NONE
3.4.4, RCS Operational Leakage				
NONE	NONE	NONE	NONE	NONE
3.4.5, RCS Leakage Detection Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.4.6, RCS Specific Activity				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	
3.4.7, Shutdown Cooling System - Hot Shutdown				
NONE	NONE	NONE	NONE	NONE
3.4.8, Shutdown Cooling System - Cold Shutdown				
NONE	NONE	NONE	NONE	NONE
3.4.9, RCS Pressure and Temperature (P/T) Limits				
NONE	NONE	NONE	NONE	NONE
3.4.10, Reactor Steam Dome Pressure				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.6.N, Structural Integrity				
None-R.1	3/4.6.N	Structural integrity requirements for the ASME Code Class 1, 2, and 3 components.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND IC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.5.1, ECCS-Operating				
NONE	NONE	NONE	NONE	NONE
3.5.2, ECCS-Shutdown				
NONE	NONE	NONE	NONE	NONE
3.5.3, IC System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.1.1, Primary Containment				
NONE	NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock				
NONE	NONE	NONE	NONE	NONE
3.6.1.3, Primary Containment Isolation Valves				
NONE	NONE	NONE	NONE	NONE
3.6.1.4, Drywell Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers				
NONE	NONE	NONE	NONE	NONE
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers				
NONE	NONE	NONE	NONE	NONE
3.6.2.1, Suppression Pool Average Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.2.2, Suppression Pool Water Level				
NONE	NONE	NONE	NONE	NONE
3.6.2.3, Suppression Pool Cooling				
NONE	NONE	NONE	NONE	NONE
3.6.2.4, Suppression Pool Spray				
3.6.2.4-R.1	3/4.7.L	The Drywell Spray requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.3.1, Primary Containment Oxygen Concentration				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment				
NONE	NONE	NONE	NONE	NONE
3.6.4.2, Secondary Containment Isolation Valves				
NONE	NONE	NONE	NONE	NONE
3.6.4.3, Standby Gas Treatment System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.7.1, Containment Cooling Service Water System				
NONE	NONE	NONE	NONE	NONE
3.7.2, Diesel Generator Cooling Water System				
NONE	NONE	NONE	NONE	NONE
3.7.3, Ultimate Heat Sink				
NONE	NONE	NONE	NONE	NONE
3.7.4, Control Room Emergency Ventilation System				
NONE	NONE	NONE	NONE	NONE
3.7.5, Control Room Emergency Ventilation Air Conditioning System				
NONE	NONE	NONE	NONE	NONE
3.7.6, Main Condenser Offgas				
NONE	NONE	NONE	NONE	NONE
3.7.7, Main Turbine Bypass System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.7.8, Spent Fuel Storage Pool Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.E, Flood Protection				
None-R.1	3/4.8.E	Flood Protection requirements.	TRM	10 CFR 50.59
Current Specification 3/4.8.F, Snubbers				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination				
None-R.1	3/4.8.G	Sealed Source Contamination requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.8.1, AC Sources - Operating				
NONE	NONE	NONE	NONE	NONE
3.8.2, AC Sources - Shutdown				
NONE	NONE	NONE	NONE	NONE
3.8.3, Diesel Fuel Oil and Starting Air				
NONE	NONE	NONE	NONE	NONE
3.8.4, DC Sources - Operating				
NONE	NONE	NONE	NONE	NONE
3.8.5, DC Sources - Shutdown				
NONE	NONE	NONE	NONE	NONE
3.8.6, Battery Cell Parameters				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.8.7, Distribution Systems - Operating				
NONE	NONE	NONE	NONE	NONE
3.8.8, Distribution Systems - Shutdown				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.9.1, Refueling Equipment Interlocks				
NONE	NONE	NONE	NONE	NONE
3.9.2, Refuel Position One-Rod-Out Interlock				
NONE	NONE	NONE	NONE	NONE
3.9.3, Control Rod Position				
NONE	NONE	NONE	NONE	NONE
3.9.4, Control Rod Position Indication				
NONE	NONE	NONE	NONE	NONE
3.9.5, Control Rod OPERABILITY - Refueling				
NONE	NONE	NONE	NONE	NONE
3.9.6, RPV Water Level - Irradiated Fuel				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.9.7, RPV Water Level - New Fuel or Control Rods				
NONE	NONE	NONE	NONE	NONE
3.9.8, Shutdown Cooling (SDC) - High Water Level				
NONE	NONE	NONE	NONE	NONE
3.9.9, Shutdown Cooling (SDC) - Low Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.E, Communications				
None-R.1	3/4.10.E	Communications requirements between the control room and refueling platform personnel.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.10.1, Reactor Mode Switch Interlock Testing				
NONE	NONE	NONE	NONE	NONE
3.10.2, Single Control Rod Withdrawal - Hot Shutdown				
NONE	NONE	NONE	NONE	NONE
3.10.3, Single Control Rod Withdrawal - Cold Shutdown				
NONE	NONE	NONE	NONE	NONE
3.10.4, Single Control Rod Drive Removal - Refueling				
NONE	NONE	NONE	NONE	NONE
3.10.5, Multiple Control Rod Withdrawal - Refueling				
NONE	NONE	NONE	NONE	NONE
3.10.6, Control Rod Testing - Operating				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.10.7, SDM Test - Refueling				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.A, Primary Containment Integrity				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
5.1, Responsibility				
NONE	NONE	NONE	NONE	NONE
5.2, Organization				
NONE	NONE	NONE	NONE	NONE
5.3, Unit Staff Qualifications				
NONE	NONE	NONE	NONE	NONE
5.4, Procedures				
NONE	NONE	NONE	NONE	NONE
5.5, Programs and Manuals				
NONE	NONE	NONE	NONE	NONE
5.6, Reporting Requirements				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
5.7, High Radiation Area				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.4, Training				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program				
NONE	NONE	NONE	NONE	NONE

7590-01-P

UNITED STATES NUCLEAR REGULATORY COMMISSION

EXELON GENERATION COMPANY, LLC

DOCKET NOS. 50-237 AND 50-249

NOTICE OF ISSUANCE OF AMENDMENT TO

FACILITY OPERATING LICENSE

The U.S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 185 to Facility Operating License No. DPR-19 and Amendment No. 180 to Facility Operating License DPR-25, issued to Exelon Generation Company, LLC (the licensee), which revised the operating licenses and the Technical Specifications for operation of the Dresden Nuclear Power Station, Units 2 and 3, respectively, located in Grundy County, Illinois. The amendments are effective as of the date of issuance.

The amendments revise the current Technical Specifications (TS, Appendix A of the operating licenses) in their entirety with a set of improved TS (ITS) based on NUREG-1433, Revision 1, "Standard Technical Specifications, General Electric Plants BWR/4," dated April 1995, and on guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132). In addition, the amendments add new conditions to the operating licenses regarding (1) the relocation of current TS requirements into licensee-controlled documents as part of the implementation of the ITS, (2) the schedule for the first performance of new and revised surveillance requirements (four conditions), and (3) continued operation with a current TS setpoint until an outage of sufficient duration permits a change to the setpoint (Unit 2 only).

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's

rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment.

Notice of Consideration of Issuance of Amendment to Facility Operating License and Opportunity for a Hearing in connection with this action was published in the FEDERAL REGISTER on February 16, 2001 (66 FR 10756). No request for a hearing or petition for leave to intervene was filed following this notice.

The Commission has prepared an Environmental Assessment related to the action and has determined not to prepare an environmental impact statement. Based upon the environmental assessment, the Commission has concluded that the issuance of the amendment will not have a significant effect on the quality of the human environment (66 FR 16689).

For further details with respect to the action see (1) the application for amendment dated March 3, 2000, and supplemented by letters dated March 24, June 5 (two letters), July 18, July 31, September 1, September 22, October 5, October 9, November 20, and December 18, 2000; and February 15 and February 28, 2001, (2) Amendment No. 185 to License No. DPR-19 and Amendment No. 180 to License No. DPR-25, (3) the Commission's related Safety Evaluation, and (4) the Commission's Environmental Assessment. Documents may be examined, and/or copied for a fee, at the NRC's Public Document Room, located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland, and accessible electronically through the ADAMS Public Electronic Reading Room link at the NRC Web site (http://www.nrc.gov).

Dated at Rockville, Maryland, this 30th day of March 2001

FOR THE NUCLEAR REGULATORY COMMISSION

Stewart N. Bailey, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation