

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. _____

TO FACILITY OPERATING LICENSE NO. DPR-24

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT 1

DOCKET NO. 50-313

1.0 INTRODUCTION

Arkansas Nuclear One, Unit 1 (ANO-1) nuclear plant has been operating with Technical Specifications (TS) issued with the original operating license on May 21, 1974, as amended. By letter dated January 28, 2000, as supplemented by letters dated August 9 and September 28, 2000, February 6, March 19, May 3, and July , 2001, Entergy Operations, Inc. (Entergy, the licensee) proposed to convert the current Technical Specifications (CTS) to improved Technical Specifications (ITS). The conversion is based upon:

- NUREG-1430, "Standard Technical Specifications for Babcock & Wilcox Plants," Revision 1, dated April 1995,
- Generic improvements to NUREG-1431, Revision 1,
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and
- 10 CFR 50.36, "Technical Specifications," as amended July 19, 1995 (60 FR 36953).

Hereinafter, the proposed or improved TS for ANO-1 are referred to as the ITS, the existing TS are referred to as the CTS, and the improved standard TS, such as in NUREG-1430, are referred to as the STS. The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1.

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of telephone conference calls that concluded on [date], 2001. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final

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Policy Statement and STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as proposed changes to STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the ANO-1 ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the ANO-1 safety analysis report (SAR) for ANO-1, for which changes to the documents by the licensee are controlled by a regulation such as 10 CFR 50.59 and may be changed without prior NRC approval). NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TS for ANO-1 to be in accordance with 10 CFR 50.36.

Since the licensee prepared the November 15, 1999, application, a number of amendments to the ANO-1 operating license were approved. Table 1 describes the amendments and the dates of issuance.

TABLE 1

Amend. No. and Date	Description of Change
204 2/8/00	Lowered the Curie limit of CTS 3.25.2 for the radioactive gas storage tanks.
205 3/31/00	Revised CTS 3.3.4(B) for the containment spray additive tank: <ul style="list-style-type: none"> • revised the minimum and the maximum sodium hydroxide tank concentration limits; • deleted the maximum specified tank volume; • expressed the minimum specified tank volume in gallons; and • moved the treatment of tank level instrumentation uncertainties and the correlation of tank level indication to the tank volume limit to the Bases, and to FSAR-described procedures.
206 4/28/00	<ul style="list-style-type: none"> • Revised CTS 3.7.2.B to allow taking startup transformer No. 2 out of service for preplanned preventive maintenance during unit operation for 30 days once in any 10-year period. • Revised CTS 3.7.2.C to relax the requirement to demonstrate operability of the redundant emergency diesel generator (EDG) when one EDG is inoperable from immediately and daily thereafter to once within 24 hours only if it is determined that (a) common cause failure does not exist, (b) it is currently in operation, or (c) it has been demonstrated operable within the previous 24 hours.

Amend. No. and Date	Description of Change
207 5/10/00	Revised CTS 3.5.3 to increase the safety features actuation system instrumentation setpoint (equivalent to ITS allowable value) for the low reactor coolant system pressure Functional Unit from ≥ 1526 psig to ≥ 1585 psig. The revised setpoint accounts for additional instrument uncertainties associated with cable insulation resistance effects and allows for the plugging of up to 1200 tubes in each steam generator.
208 8/17/00	Deleted CTS 6.8.1.i, administrative control requirements to establish, implement, and maintain written procedures for post accident sampling.
209 9/25/00	Revised CTS (?) regarding heavy load handling requirements and transportation provisions that would permit the movement of the original and replacement Unit 2 steam generators (SGs) through the ANO-2 containment construction opening during the SG replacement outage.
210 12/28/00	Revised laboratory testing requirements for activated charcoal filters in CTS 3.13.1.b, for the penetration room ventilation system, and CTS 3.15.1.b, for the fuel handling area ventilation system, to incorporate the use of ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon."
211 3/12/01	<p>Revised CTS 3.5.1.8.a to:</p> <ul style="list-style-type: none"> change the 4160V loss-of-voltage relay setting allowable values from >3115 VAC but < 3177 VAC to ≥ 1600 VAC but ≤ 3000 VAC; and add an actuation time delay allowable value of ≥ 0.30 but ≤ 0.98 seconds for the 4160V loss-of-voltage relays. <p>Revised CTS 3.5.1.8.b to change the 480 V degraded voltage relay setting allowable values from > 423 VAC but < 431 VAC to ≥ 432.2 VAC but ≤ 436.0 VAC.</p>
212 3/28/01	<ul style="list-style-type: none"> Revised CTS 4.18.5.a.4 to allow use of the reroll repair process to repair steam generator tubes with defects in the upper and lower tubesheet areas in accordance with BAW-2303P, Rev. 4. Also modified definition of a degraded tube. Revised CTS 4.18.5.a.7 by deleting the previous allowances for reroll repair. Revised CTS 4.18.5.a.9 by changing the rerolled region of the tube that will need to be inspected after the reroll repair.

Amend. No. and Date	Description of Change
213 3/28/01	<ul style="list-style-type: none"> Revised CTS 4.18.3.a.5 and 4.18.3.a.7 to reference ANO Engineering Report No. 00-R-1005-01, Rev. 1, "Management Program for Volumetric Outer Diameter Intergranular Attack (ODIGA) in the Tubesheets of Once-Through Steam Generators," as the report to be used to assess steam generator tubes with indications of ODIGA. Removed from CTS 4.18.3.a.7 the restriction of using the ODIGA alternate repair criteria (ARC) solely for cycle 16. Revised CTS 4.18.5.b to delete the second paragraph which allowed tube 110/60 to remain in service (See Amendment 203) during cycle 16, which has been completed.

The licensee has incorporated these amendments, as appropriate, into the ITS.

The NRC staff's evaluation of the application dated January 28, 2000 (ADAMS Accession Number ML003680614), is presented in this SE. The NRC staff issued requests for additional information (RAIs) and the licensee submitted letters to the staff in response, as noted in Table 2. The licensee's letters also forwarded supplements to the submittal to reflect resolution of staff comments and to correct editorial corrections identified by the licensee. Note that the NRC staff requested no additional information regarding proposed ITS Sections 3.0 and 5.0. The licensee, however, did make editorial revisions to Section 5.0 in a letter dated March 19, 2001 (ADAMS Accession Number ML010810366). The staff also sent Entergy letters dated April 20, 2000 (ADAMS Accession Number ML003705745), regarding the review schedule, and April 12, 2001 (ADAMS Accession Number ML011020422), regarding a change in the review schedule.

TABLE 2

Date (ADAMS Accession Number)	RAI Document Description	ITS Section	Reply Date (ADAMS Accession Number)
April 24, 2000 (ML003680614)	Letter from NRC to Entergy with RAIs on proposed ITS electrical power system specifications during shutdown conditions.	3.8	August 9, 2000 (ML003741782)
May 15, 2000 (ML003715200)	Meeting Notice memorandum for public meeting on proposed ITS containment system specifications; RAIs attached.	3.6	September 28, 2000 (ML003756836)

Date (ADAMS Accession Number)	RAI Document Description	ITS Section	Reply Date (ADAMS Accession Number)
November 13, 2000 (ML003769245)	Meeting Summary memorandum regarding meeting on August 30 and 31, 2000, on proposed ITS containment system specifications; additional RAIs attached.	3.6	?
January 18, 2001 (ML010230352)	Meeting Summary memorandum regarding meeting on December 18 and 19, 2000, on various proposed ITS specifications; RAIs attached.	1.0 2.0 3.1 3.2	February 6, 2001 (ML010450379)
January 18, 2001 (ML010230352)	Meeting Summary memorandum regarding meeting on December 18 and 19, 2000, on various proposed ITS specifications; RAIs attached.	3.4 3.5 3.9	March 19, 2001 (ML010810366)
January 18, 2001 (ML010230352)	Meeting Summary memorandum regarding meeting on December 18 and 19, 2000, on various proposed ITS specifications; RAIs attached.	3.3 3.7 3.8	May 3, 2001 (ML011270004)
February 26, 2001 (ML010600459)	Meeting Summary memorandum regarding meeting on January 23 and 24, 2001, on proposed ITS electrical power system specifications; additional RAIs attached.	3.8	May 3, 2001 (ML011270004)
February 26, 2001 (ML010600459)	Meeting Summary memorandum regarding meeting on January 23 and 24, 2001, on proposed ITS design features specifications; RAIs attached.	4.0	March 19, 2001 (ML010810366)
July xx, 2001	Transmittal of draft safety evaluation for the ITS.	all	TBD

The license conditions implementing the conversion will make enforceable the following aspects of the conversion: (1) the relocation of requirements from the CTS and (2) the implementation schedule for new and revised SRs in the ITS.

The Commission's proposed action on the ANO-1 application for an amendment dated November 15, 1999, was published in the *Federal Register* on , 2001 (66 FR). The *Federal Register* notice also addressed beyond scope changes identified in the licensee's submittals.

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During its review, the NRC staff relied on the Final Policy Statement and the STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that the licensee can develop ITS based on STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation. The SE also explains the NRC staff's conclusion that the ITS, which are based on the STS as modified by plant-specific changes, are consistent with the ANO-1 current licensing basis and the requirements of 10 CFR 50.36.

The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, it is acceptable that the ITS differ from the STS, to reflect the current licensing basis for ANO-1. The NRC staff approves the licensee's changes to the CTS with modifications documented in the licensee's supplemental submittals.

For the reasons stated *infra* in this SE, the NRC staff finds that the ITS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

[S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences. As recorded in the Statements of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," (33 FR 18610, December 17, 1968), the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility owners groups and the NRC staff developed improved STS, such as NUREG-1430, that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TS, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1430, Revision 0, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The STS in NUREG-1430 was established as a model for developing the ITS for Babcock and Wilcox plants in general. The STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the nuclear steam supply system (NSSS) vendor owners groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1430 provides an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety. The STS in NUREG-1430 apply to ANO-1.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the safety benefits of the STS, and encouraged licensees to use the STS as the basis for plant-specific TS amendments, and for complete conversions to ITS based on the STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co. (Trojan Nuclear Plant)*, ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

[T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

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By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TS; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

- Criterion 1* Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- Criterion 2* A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- Criterion 3* A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- Criterion 4* A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part 3.0 of this SE explains the NRC staff's conclusion that the conversion of the ANO-1 CTS to ITS based on STS, as modified by plant-specific changes, is consistent with the ANO-1 current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

3.0 EVALUATION

In its review of the ANO-1 ITS application, the NRC staff evaluated five kinds of changes to the CTS as defined by the licensee. The staff's review also included an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in licensee-controlled documents. Following are the five kinds of CTS changes:

- A Administrative - changes to the CTS that result in no changes to existing restrictions and flexibility (i.e., nontechnical changes in the presentation of CTS requirements).
- M More Restrictive - changes to the CTS that result in added restrictions or reduced flexibility (i.e., additional TS requirements).
- L Less Restrictive "Specific" - changes to the CTS that result in reduced restrictions or added flexibility (i.e., changes, deletions, and relaxations of CTS requirements).
- LA Less Restrictive - changes to the CTS that move details out of the CTS and into the Bases, SAR, or other appropriate licensee-controlled document (i.e., design details, system descriptive details, and procedural details).

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- R Relocations - relaxations to the CTS in which whole CTS specifications (the LCO, and associated action and surveillance requirements) are relocated from the CTS to licensee-controlled documents.

The ITS application included a justification for each proposed change to the CTS in a numbered discussion of change (DOC), using the above letter designations as appropriate. In addition, the ITS application explained each difference between ITS and STS requirements in a numbered discussion of difference (DOD).

In its review, the NRC staff identified the need for clarifications and additions to the January 28, 2000, ITS application in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. The NRC staff's comments were documented as requests for additional information (RAIs) provided to the licensee as described in Table 2. The licensee provided responses to the RAIs in letters also as described in Table 2. The letters clarified the licensee's bases for translating the CTS requirements into ITS. The NRC staff finds that the licensee's submittals, including the responses to the RAIs, provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of the licensee's proposed changes to the CTS.

The changes to the CTS as presented in the ITS application are listed and described in the following five tables attached to this SE:

- Table A - Administrative (A) Changes to the CTS
- Table M - More Restrictive (M) Changes to the CTS
- Table L - Less Restrictive (L) Changes to the CTS
- Table LA - Removal of Details (LA) from the CTS
- Table R - Relocated Specifications (R) from the CTS

These tables provide a summary description of the proposed changes to the CTS, references to the specific CTS requirements that are being changed, and the specific ITS that incorporate the changes. The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are provided in the licensee's application and supplemental letters.

The NRC staff's evaluation and additional description of the six kinds of changes to the CTS requirements listed in Tables A, M, L, and R, are presented in Sections A through E below, as follows:

- Section A Administrative (A)
- Section B More Restrictive (M)
- Section C Less Restrictive (L)
- Section D Removed Details (LA)
- Section E Relocated Specifications (R))

The control of specifications, requirements and information removed from the CTS and placed in licensee-controlled documents is described in Section F below, and other TS changes (i.e., beyond scope changes) are described in Section G below.

A. Administrative Changes to the CTS

Administrative (non-technical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used the STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

- Identifying plant-specific wording for system names, etc.;
- Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS;
- Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS;
- Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TSs) but which do not involve a change in requirements;
- Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements;
- Deletion of TSs which no longer apply;
- Deletion of details that are strictly informational and have no regulatory basis; and
- Deletion of redundant TS requirements that exist elsewhere in the TS or in Regulation.

Table A lists the administrative changes being made in the ANO-1 ITS conversion. Table A is organized in STS order by each A-type DOC to the CTS, and provides a summary description of the administrative change that was made, and CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and STS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. More Restrictive Changes to the CTS

The licensee, in electing to implement the specifications of the STS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment that is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the ANO-1 ITS conversion. Table M is organized in STS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive Changes to the CTS

Less restrictive requirements include deletions and relaxations to portions of the CTS requirements that are being retained in ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of: (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The ANO-1 design was also reviewed to determine if the specific design basis and licensing basis for ANO-1 are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

All of the less restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of the CTS requirements that can be grouped in the following six categories:

- Relaxation of LCO Requirement (Category 1)
- Relaxation of Applicability (Category 2)
- Relaxation of Surveillance Requirement (Category 3)
- Relaxation of Required Action (Category 4)
- Relaxation of CTS Reporting Requirements (Category 5)
- Relaxation of Completion Time (Category 6)

The following discussions address why portions of various specifications within each of these seven categories of information or specific requirements are not required to be included in ITS.

1. Relaxation of LCO Requirement (Category 1)

CTS contain LCOs that are overly restrictive because they specify limits on operational and system parameters and on system operability beyond those necessary to meet safety analysis assumptions. CTS also contain administrative controls that do not contribute to the safe operation of the plant. The ITS, consistent with the guidance in the STS, omit such operational limits and administrative controls. This category of change includes (1) deletion of equipment or systems addressed by the CTS LCOs which are not required or assumed to function by the applicable safety analyses; (2) addition of explicit exceptions to the CTS LCO requirements (e.g., mode entry restrictions equivalent to those of ITS LCO 3.0.4), consistent with the guidance of the STS and normal plant operations, to provide necessary operational flexibility but without a significant safety impact; and (3) deletion of miscellaneous administrative controls such as reporting requirements, sometimes contained in action requirements, that have no affect on safety. Deletion of such administrative controls allows operators to more clearly focus on issues important to safety. The ITS LCOs and administrative controls resulting from these changes will continue to maintain an adequate degree of protection consistent with the safety analysis, while providing an improved focus on issues important to safety and necessary operational flexibility without

adversely affecting the safe operation of the plant. Therefore, these changes, which are consistent with STS, and that fall within Category 1 are acceptable.

2. Relaxation of Applicability (Category 2)

Reactor operating conditions are used in CTS to define when the LCO features are required to be operable. CTS applicability requirements can be specific defined terms of reactor conditions, such as hot shutdown, cold shutdown, reactor critical or power operating condition. CTS applicability requirements can also be more general. Depending on the circumstances, CTS may require that the LCO be maintained within limits in "all modes" or "any operating mode." Generalized applicability conditions are not contained in STS, therefore ITS eliminates CTS requirements such as "all modes" or "any operating mode," replacing them with ITS defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

In another application of this category of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminate or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS are satisfied by exiting the specified LCO's applicability, thus taking the plant out of the conditions that require the safety system to be operable. Therefore, these changes, which are consistent with STS, and that fall within Category 2 are acceptable.

3. Relaxation of Surveillance Requirement (Category 3)

Prior to placing the plant in a specified operational mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR Frequency thereafter, the CTS require verifying the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria as well as any specified conditions for the conduct of the test. Relaxations of CTS SRs include relaxing both the acceptance criteria and the conditions of performance. These CTS SR relaxations are consistent with STS.

Relaxations of CTS SR acceptance criteria provide operational flexibility, consistent with the guidance of the STS, but do not reduce the level of assurance of operability provided by the successful performance of the surveillance. Such revised acceptance criteria are acceptable because they remain consistent with the application of the plant safety analysis assumptions for operability of the LCO-required features.

Relaxations of CTS SR performance conditions include not requiring testing of deenergized equipment (e.g., instrumentation channel checks) and equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). These changes are acceptable because the existing surveillances are not necessary to ensure the capability of the affected components to perform their intended

functions. Another relaxation of SR performance conditions is the allowance to verify the position of valves in high radiation areas by administrative means. This change is acceptable because licensee controls regarding access to high radiation areas make the likelihood of mis-positioning such valves negligible.

Finally, the ITS permits the use of an actual as well as a simulated actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS required features cannot distinguish between an "actual" signal and a "test" signal.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. Therefore, because of the reasons stated, less restrictive changes to CTS SRs falling within Category 3 are acceptable.

4. Relaxation of Required Actions (Category 4)

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS required actions, the ITS actions result in extending the time period for taking the plant outside the applicability into shutdown conditions. For example, changes in this category include providing an option to: isolate a system, place equipment in the state assumed by the safety analysis, satisfy alternate criteria, take manual actions in place of automatic actions, "restore to operable status" within a specified time frame, place alternate equipment into service, or use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design and industry practice and do not compromise safe operation of the plant. Therefore, these changes, which are consistent with STS, and that fall within Category 4 are acceptable.

5. Relaxation of CTS Reporting Requirements (Category 5)

CTS include requirements to submit Special Reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for Special Reports and instead relies on the reporting requirements of 10 CFR 50.73. ITS changes to reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS required limits. Therefore, these changes, which are consistent with the STS, and that fall within Category 5 are acceptable.

6. Relaxation of Completion Time (Category 6)

Upon discovery of a failure to meet an LCO, TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures

that must be taken within specified completion times. These times define limits during which operation in a degraded condition is permitted.

Incorporating completion time extensions is acceptable because completion times take into account the operable status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. Therefore, required action completion time extensions, which are consistent with STS, and that fall within Category 6 are acceptable.

Table L is organized in STS order by each L-type DOC. For each change, the table lists (1) the DOC identifier; (2) a summary description of the change; (3) the reference numbers of the associated ITS requirements; (4) the reference numbers of the associated CTS requirements; and (5) the less restrictive change category.

D. Removed Details from the CTS

When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS. Changes to the CTS that involve the removal of specifications, specific requirements and detailed information from individual specifications were all evaluated and grouped within the following Types 1 through 4:

- | | |
|--------|---|
| Type 1 | Details of System Design and System Description Including Design Limits |
| Type 2 | Descriptions of System or Plant Operation |
| Type 3 | Procedural Details for Meeting TS Requirements and Related Reporting Requirements |
| Type 4 | Relocated Redundant Requirements |

The following discussions address why each of the four types of information or specific requirements are not required to be included in ITS.

1. Details of System Design and System Description Including Design Limits (Type 1)

The design of the facility is required to be described in the SAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in

accordance with an NRC-approved QA Program (SAR Chapter 1.6). In 10 CFR 50.59, controls are specified for changing the facility as described in the SAR which includes the new Technical Requirements Manual (TRM) by reference, and in 10 CFR 50.54(a) criteria are specified for changing the QA Program. In the ITS, the Bases also contain descriptions of system design. The ANO-1 administrative controls specification ITS 5.5.14 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled by NRC requirements, the SAR, controlled design documents and drawings, or the TS Bases, as appropriate. Cycle-specific design limits are moved from the CTS to the Core Operating Limits Report (COLR) in accordance with Generic Letter 88-16. ITS Administrative Controls are revised to include the programmatic requirements for controlling the COLR. Therefore, it is acceptable to remove Type 1 details from CTS and place them in licensee-controlled documents.

2. Descriptions of System or Plant Operation (Type 2)

The plans for the normal and emergency operation of the facility are required to be described in the SAR by 10 CFR 50.34. ITS 5.4.1 requires written procedures to be established, implemented, and maintained for plant operating procedures. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the SAR. In the ITS, the Bases also contain descriptions of system operation. CTS provides lists of acceptable devices that may be used to satisfy LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the SAR, plant operating procedures, and the TS Bases, as appropriate. Therefore, it is acceptable to remove Type 2 details from CTS and place them in licensee-controlled documents.

3. Procedural Details for Meeting TS Requirements, Reporting Requirements, and Indication-only Instrumentation Requirements (Type 3)

Details for performing action and surveillance requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the SAR, and the ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.5, which specifies the scope of the limits contained in the COLR

and mandates NRC approval of the analytical methodology. The QA Program is approved by the NRC and contained in SAR Chapter 1.6, and changes to the QA Program are controlled by 10 CFR 50.54(a). The Offsite Dose Calculation Manual (ODCM) is required by ITS section 5.5.1. The TRM is incorporated by reference into the SAR, and changes to the TRM are controlled by 10 CFR 50.59. The Inservice Test (IST) program is required by ITS 5.5.8 and is controlled by ITS 5.4.1.d. Indication-only instrumentation, test equipment, and alarms used for monitoring system operation and testing are usually not required to be operable to support the operability of a system or component. Thus, the STS generally contain no operability, action and surveillance requirements for indication-only equipment. Control of the availability of, and necessary compensatory activities if not available, for such indication instruments, monitoring instruments, and alarms are presently addressed by plant operational procedures and policies.

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled by NRC requirements, the SAR, plant procedures, Bases and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, removal of reporting requirements from LCOs is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary. Removal of requirements for indication-only instrumentation is acceptable because such instrumentation usually does not support system operability. Therefore, it is acceptable to remove Type 3 details from CTS and place them in licensee-controlled documents.

4. Relocated Redundant Requirements (Type 4)

Certain CTS administrative requirements are redundant to regulations and thus are relocated to the SAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TS. Changes to the facility or to procedures as described in the SAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QA plan, and ITS 5.5.14 governs changes to the ITS Bases. Therefore, it is acceptable to remove Type 4 details from CTS and place them in licensee-controlled documents.

CTS requirements that are not required to be in TS and that can be adequately controlled by other regulatory or TS requirements, can be relocated to licensee controlled documents. Table LA lists the requirements and detailed information in the CTS that are being moved to licensee-controlled documents and not retained in the ITS.

Table LA is organized in STS order by each LA-type DOC. It includes the following: (1) the DOC identifier; (2) a summary description of the removed details and requirements; (3) the CTS reference; (4) the name of the licensee-controlled document to contain the removed details and requirements (new location); (5) a characterization of the type of change; and (6) the regulation (or ITS Specification) for controlling future changes to relocated requirements (change control process).

The above types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- TS Bases controlled in accordance with ITS 5.5.14, "Technical Specifications (TS) Bases Control Program."
- SAR (which includes the TRM) controlled by 10 CFR 50.59.
- Programmatic documents required by ITS Section 5.5 controlled by ITS Section 5.4.
- Inservice Inspection (ISI) and Inservice Testing Programs required by ITS Section 5.5.8 and controlled by 10 CFR 50.55a.
- Offsite Dose Calculation Manual controlled by ITS 5.5.1.
- Core Operating Limits Report controlled by ITS 5.6.5.
- QA Program, as approved by the NRC and referenced in the SAR, controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- Site Emergency Plan controlled by 10 CFR 50.54(q).

To the extent that information has been moved to licensee-controlled documents, such information is not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria contained in 10 CFR 50.36 and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Specifications (R) from the CTS

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria presently contained in 10 CFR 50.36 may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. This section discusses the relocation of entire specifications in the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. ANO-1 proposes relocating such specifications from the CTS to the SAR, which includes the TRM, as appropriate. Relocation of these requirements to the SAR and TRM is acceptable in that changes to the SAR and TRM will be adequately controlled by 10 CFR 50.59. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R is organized in order of associated CTS requirement being relocated. It includes the following: (1) the reference numbers of the associated CTS requirements; (2) a summary description of the relocated requirements; and (3) the regulation (or ITS requirement) for controlling future changes to relocated requirements (change control process). The table also references the paragraph numbers of the evaluations below.

The NRC staff's evaluation of each relocated specification listed in Table R is provided below. The evaluation is based on information contained in Appendix A of the licensee's ITS application cover letter dated January 28, 2000, as supplemented by letter dated July ____, 2001.

1. Reactor Vessel Internals Vent Valves (CTS 3.1.1.4 and Table 4.1-2, Item 15)

The eight reactor internals vent valves act similarly to check valves, relieving pressure resulting from steam generation within the core to enable rapid reflood of core internals following a cold leg pipe rupture. The valves are passive devices and tested each refueling outage. No indication is available to the operator relevant to the position of the valves and no testing can be performed on these eight valves above Mode 6. The requirement to ensure their operability can only be verified by inservice inspection testing because the operation of these valves cannot be directly monitored during plant operation. Thus the reactor internals vent valves operational and testing requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

2. Reactor Coolant System Vents (CTS 3.1.1.7 and Table 4.1-2, Item 16)

The reactor coolant pressure boundary is protected by code safety relief valves during normal operation. An electromagnetic relief valve is also available to support this function and to provide low temperature over pressure (LTOP) protection when operating in lower modes. The reactor coolant system (RCS) vents are not designed to support either of these functions, but can be used to aid in the removal of non-condensable gases from high points on the pressurizer, reactor head, and hot leg following a loss of coolant accident (LOCA), or to support establishing a steam bubble in the pressurizer during plant heatup. The RCS vents are used to remove non-condensable gases that might otherwise hinder natural circulation operation of the RCS, but are not relied upon by the ANO-1 safety analysis to ensure the reactor core remains covered with coolant or to ensure radiological releases to the public are maintained within acceptable limits. The vent valves are provided with remote-manual operation, but do not receive an automatic actuation signal. The functioning of the RCS vents is not assumed in the safety analysis, but rather is used to implement not-safety analysis functions. Thus, the RCS vent path operability, action and testing requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

3. Steam Generator P/T Limits (CTS 3.1.2.4 and 3.1.2.6)

The limitation of CTS 3.1.2.4 on steam generator (SG) pressure and temperature (P/T) provide protection against nonductile failure of the secondary side (shell) of the SG by limiting SG secondary side pressure to ≤ 200 psig when SG shell temperature is below 100°F. This limit is calculated using the ASME code for Class A components and is considered to be conservative. CTS 3.1.2.6 requires an engineering evaluation of the continued structural integrity of the SGs if the limit is exceeded. This limit, however, is not an operating restriction that is an initial condition of a DBA or transient. Thus the SG P/T

limits do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

4. Pressurizer Heatup and Cooldown Limits (CTS 3.1.2.5 and 3.1.2.6)

The pressurizer heatup and cooldown rate limit of $\leq 100^{\circ}\text{F}/\text{hour}$ and the restriction to not use pressurizer spray if the differential temperature between the spray line fluid and the pressurizer exceeds 430°F , of CTS 3.1.2.5, are intended to prevent non-ductile failure of the pressurizer, and assure compatibility of operation with the licensing basis fatigue analysis (described in SAR Section 4.1.2.4) and spray line nozzle stress analysis. These limitations meet the requirements of ASME Section III, Appendix G, are consistent with structural analysis results, and are considered to be conservative. CTS 3.1.2.6 requires an engineering evaluation of the continued structural integrity of the pressurizer if these limits are exceeded. These limits, however, are not an operating restriction that is an initial condition of a DBA or transient. Thus the limits on pressurizer heatup and cooldown, and spray line operation do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

5. Reactor Coolant System Chemistry (CTS 3.1.5 and Table 4.1-3, Item 1.e)

The CTS requirements on RCS chemistry help to ensure the integrity of the RCS by limiting oxygen, chloride, and fluoride concentrations. Long-term elevated concentrations of these elements can lead to potential stress corrosion attack of RCS components. However, exceeding CTS chemical limits does not result in an immediate threat to the integrity of the RCS, nor are these elements considered initiators of any accident previously analyzed. The limits on RCS oxygen, fluoride, and chloride concentrations are not directly pertinent to the safety analysis, but rather describe preventive limits to aid in ensuring the long-term integrity of the RCS. Thus the RCS chemistry LCO, action and surveillance requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

6. Main Steam Line Radiation Monitoring Instrumentation (CTS 3.5.1.14, 3.5.1.1, Table 3.5.1-1 Functional Unit 17 and Note 30, and Table 4.1-1 item 28c)

The main steam line radiation monitors provide a normal operations function of radiological effluent release monitoring and also a post accident monitor (PAM) function. The information provided by these monitors is not directly pertinent to the safety analysis, but rather describe equipment used to implement not-safety analysis functions. Because these functions are not pertinent to the fulfillment of the safety analysis, they can be moved to a licensee controlled document without a significant impact on safety. In addition, the PAM function of these instruments is neither Type A nor Category 1. The radiological effluent release monitoring function is relocated to the ODCM (in accordance with Generic Letter 89-01), and the PAM function is relocated to the SAR (with the exception of the requirement to submit a Special Report as discussed in DOC L14 of ITS submittal Section 3.3D). Thus the main steam radiation monitoring operational and testing requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the ODCM and SAR as discussed above.

7. Restriction on Use of Shutdown Bypass Key Switch During Power Operation (CTS 3.5.1.4)

CTS 3.5.1.4 specifies that "the key operated shutdown bypass switch associated with each reactor protection system channel shall not be used during reactor power operation except during channel testing." The shutdown bypass switch enables certain RPS trip functions to be bypassed to allow control rod drive tests to be performed after the reactor has been shut down and depressurized below the RCS Low Pressure trip setpoint, which is less than the Allowable Value of ≤ 1720 psig. These RPS trip functions, as listed in ITS Table 3.3.1-1, are:

Function 4, RCS Low Pressure,
Function 5, RCS Variable Low Pressure,
Function 7, Reactor Coolant Pump to Power, and
Function 8, Nuclear Overpower RCS Flow and Measured AXIAL POWER IMBALANCE.

Any attempt to operate one of these key switches under certain plant conditions, however, will result in a trip of the associated RPS channel. These plant conditions are when (a) RCS pressure is above the trip setpoint of the RCS Low Pressure RPS function, or (b) reactor power is above the trip setpoint of the Nuclear Overpower - Low Setpoint RPS function, which is less than the Allowable Value of $\leq 5\%$ of Rated Thermal Power (RTP) (as specified for Function 1.b in ITS Table 3.3.1-1). Likewise, if two or more switches are operated under the aforementioned plant conditions, a reactor trip will occur, which is the intended safety function of the RPS. Based on this design, the CTS restriction placed on switch operation acts only to prevent an unnecessary reactor trip and will not prevent the plant from entering a safe shutdown condition.

When reactor power is below 5% RTP and RCS pressure is below 1720 psig, trip protection is provided while in shutdown bypass for (a) reactivity accidents at low system temperature and pressure and (b) unanticipated high pressure conditions. During such events, any safety or regulating rods that are withdrawn will be automatically inserted into the core if the flux level or reactor coolant pressure exceeds the respective bistable setpoint. Thus use of the bypass key switch under these conditions has no effect on the ability of the RPS to automatically terminate a transient involving an increase in core reactivity or RCS pressure.

The use of the shutdown bypass key switch is under administrative control. The CTS 3.5.1.4 restriction is not (a) used for detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA, (b) used to indicate the status of or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient, or (c) part of a primary success path in the mitigation of a DBA or transient. Because reactor protection is provided by other means and inadvertent switch operation will result in a fail-safe trip of the associated RPS channel, this restriction does not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate this specification to the TRM.

8. Radiation Monitoring Instrumentation During Fuel Loading and Refueling (CTS 3.8.1 and 3.8.9)

During refueling and fuel handling operations, CTS 3.8.1 requires monitoring radiation levels with specific radiation monitors, or with suitable portable survey instruments. Radiation monitors are permanently installed in areas of personnel activity involving fuel handling and provide an alarm locally and in the Control Room when triggered. When inoperative, the local radiation coverage and alarm functions are provided by portable survey instrumentation. CTS 3.8.9 requires ceasing movement of fuel into the core and all operations that may increase core reactivity if this monitoring requirement is not satisfied. The monitors are not (a) used for detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA, (b) used to indicate the status of or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient, or (c) part of a primary success path in the mitigation of a DBA or transient. Thus these monitoring requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore it is acceptable to relocate these specifications to the TRM.

9. Direct Communications During Changes in Core Geometry (CTS 3.8.5 and 3.8.9)

CTS 3.8.5 requires maintaining direct communications between the control room personnel and refueling personnel in the reactor building when changes in core geometry are taking place during refueling to ensure that personnel in both locations can be promptly informed of significant changes in the plant status or core reactivity condition. The communications allow for coordination of activities that require interaction between the control room and refueling personnel. CTS 3.8.9 requires ceasing movement of fuel into the core and all operations which may increase core reactivity if this requirement is not satisfied. This communications requirement, however, is not (a) used for detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA, (b) used to indicate the status of or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient, or (c) part of a primary success path in the mitigation of a DBA or transient. Thus the required communications do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

10. Minimum Separation Between Fuel Handling Bridges (CTS 3.8.8 and 3.8.9)

CTS 3.8.8 requires maintaining a minimum 10 feet separation between fuel assemblies being moved simultaneously by the bridges in the fuel transfer canal. When being moved, irradiated fuel assemblies should not be brought close to each other due to the possibility of a criticality accident or, more likely, cladding damage by contact. CTS 3.8.9 requires ceasing movement of fuel into the core and all operations which may increase core reactivity if this restriction is not satisfied. In normal use, however, it is physically impossible for fuel assemblies being moved with the fuel transfer canal bridges to be within 10 feet of each other. This 10-foot separation restriction and associated action requirement considers abnormal use of this equipment. This requirement is not an operating restriction that is an initial condition of a DBA or transient. Thus it does not meet the criteria of

10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

11. Fuel Handling Operations Under Tornado Watch (CTS 3.8.12)

During a tornado watch for the vicinity of ANO, CTS 3.8.12 requires ceasing fuel handling operations in the Auxiliary Building and the placing related equipment in a safe configuration. These actions are part of the requirements for responding to high winds, tornados, or thunderstorms, but are not operating restrictions that are initial conditions of a DBA or transient. Thus they do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate this specification to the TRM.

12. Requirements for Movement of Spent Fuel Shipping Casks (CTS 3.8.13)

(Open Issue) When ANO was originally designed, the movement of a loaded spent fuel shipping cask into or above the Auxiliary Building equipment shaft was to be limited to periods of certain atmospheric dispersion conditions and with the rail spur door shut and the fuel handling area ventilation operating. CTS 3.8.13 requires these conditions to be met in order to allow carrying loaded spent fuel shipping casks above or into the auxiliary building equipment shaft in support of shipping spent fuel off-site for testing or other purposes. ANO has not needed to ship spent fuel off-site for 10 years. Furthermore, any future shipment will require prior NRC approval in accordance with 10 CFR Part 71. The CTS conditions for movement of loaded spent fuel shipping casks are based on the type and amount of spent fuel being transported. Because any future shipment will likely deviate in the amount and type of spent fuel being transported from that of past shipments, the CTS requirements do not guarantee adequate margin to safety will be afforded. [Need additional justification, particularly regarding discussion of relevance to accident analysis.] [Thus they do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate this specification to the TRM.]

13. 2000 Pound Load Limit Over the Spent Fuel Pool (CTS 3.8.14.)

CTS 3.8.14 prohibits loads in excess of 2000 pounds from traveling over fuel assemblies in the spent fuel pool (SFP). This ensures that no loads heavier than the weight of a single spent fuel assembly plus the tool for moving the assembly will be carried over fuel stored in the SFP. In the event that the load is dropped, the activity released is limited to that assumed in the fuel handling accident analysis. This also prevents any possible distortion of fuel assemblies in the storage racks from resulting in a critical configuration. The specification more accurately refers to the building cranes in the spent fuel area since the fuel bridge is not designed for handling loads other than a single fuel assembly or control rod. Interlocks under administrative controls are installed that prevent inadvertent crane travel over the spent fuel pool. These controls ensure crane testing, safe load paths, and the load weights are verified prior to defeating the physical interlocks. The load limit, however, is not an operating restriction that is required to satisfy an initial condition of the fuel handling accident analysis. The design of the fuel handling equipment, the various loads that can be carried by it, and the aforementioned crane interlocks ensure that the CTS

limit will not be exceeded. Thus this limit does not meet the criteria of 10 FR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate this specification to the TRM.

14. Shock Suppressors (Snubbers) (CTS 3.16, 4.16, and Table 4.16-1)

Shock suppressors (snubbers) are used on piping systems or equipment to limit displacement from dynamic loads such as earthquake or thermal-hydraulic transient, while allowing displacement from thermal expansion. Shock suppressors are not active components, but are a type of support like springs, baseplates, or struts with the same potential for impact on operability as any support. The majority of snubbers at ANO-1 are installed on Seismic Class I lines, which include all of the safety systems. Snubber testing is required by 10 CFR 50.55a to be performed in accordance with ASME/ANSI OM Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints." Thus, specifying such testing in TS is unnecessary. Snubbers are not a design feature that is an initial condition of a DBA or transient. Thus CTS requirements for snubbers do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Snubber testing will be adequately controlled in accordance with ITS 5.5.8, Inservice Test Program, 10 CFR 50.55a, and 10 CFR 50.59. Therefore, it is acceptable to relocate the snubber specifications to the TRM.

15. Reactor Building Purge Filtration System (CTS 3.22 and 4.25)

The reactor building purge filtration system was originally designed to filter the reactor building atmosphere during normal operations for ease of personnel entry into the reactor building. However, the purge system isolation valves may not be capable of isolation under accident conditions in Modes 1, 2, 3, and 4. Therefore, they are prohibited from being opened in these modes of operation. CTS requires the system to be operable during fuel handling operations to limit the impact of a release of radioactive material should a fuel assembly be damaged. The system consists of a supply fan, a filter train, and an exhaust fan in series. The filter train consists of a pre-filter, a HEPA filter and a charcoal adsorber in series. A new analysis of the consequences of a fuel handling accident in the Reactor Building has concluded that the 10 CFR 100 limits are met without the RB purge system operating (Reference SAR Section 14.2.2.3.4). The reactor building purge filtration system, however, is not a design feature that is an initial condition of the fuel handling accident analysis. Thus the RB purge filtration system operational and testing requirements no longer meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate these specifications to the TRM.

16. Refueling System Interlocks (CTS 4.1.b, and Table 4.1-2 Item 5)

CTS Table 4.1-2 specifies a minimum test frequency for various plant equipment. Most of this equipment is also addressed by explicit CTS operability and action requirements. Item 5 of this table, refueling system interlocks, has no explicit CTS requirements other than the minimum frequency specified by this table for verifying the functioning of the interlocks at the start of each refueling shutdown. In its submittal, the licensee stated it considers CTS 4.0.1 and 4.0.3 to specify an implied LCO for this equipment because they require that (a) SRs shall be met during operational modes or other conditions specified for LCOs; and

(b) failure to perform an SR within the allowed surveillance interval shall constitute noncompliance with the operability requirements of the associated LCO. Operability of the refueling system interlocks ensures that the equipment used to handle fuel within the reactor pressure vessel functions as designed and that the manipulator crane has sufficient load capacity for handling fuel assemblies and/or control rods. Although the interlocks, designed to provide the above capabilities, can prevent damage to the refueling equipment and fuel assemblies, they are not assumed to function to mitigate the consequences of a design basis fuel handling accident. Thus, the CTS requirements for refueling system interlocks do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate the specifications for the refueling system interlocks to the TRM.

17. Spent Fuel Cooling System (CTS 4.1.b, and Table 4.1-2 Item 10)

CTS Table 4.1-2 specifies a minimum test frequency for various plant equipment or systems. Most of this equipment is also addressed by explicit CTS operability and action requirements. Item 10 of this table, spent fuel cooling system, has no explicit CTS requirements other than the minimum frequency specified by this table for verifying the functioning of the spent fuel cooling system every 18 months when irradiated fuel is in the pool. In its submittal, the licensee stated it considers CTS 4.0.1 and 4.0.3 to specify an implied LCO for this system because they require that (a) SRs shall be met during operational modes or other conditions specified for LCOs; and (b) failure to perform an SR within the allowed surveillance interval shall constitute noncompliance with the operability requirements of the associated LCO. The spent fuel pool cooling system functions to remove decay heat from spent fuel stored in the pool. Without it, the temperature of the water in the pool could rise to the boiling point, resulting in a loss of water inventory over time, requiring operator action to correct. The capability to maintain subcooled conditions in the spent fuel pool using the spent fuel cooling system is not, however, a design feature or operating restriction that is an initial condition of the design basis fuel handling accident. Neither does it function to mitigate the consequences of the design basis fuel handling accident. Thus, the CTS requirements for the spent fuel cooling system do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate the specifications for the spent fuel cooling system to the TRM.

18. Emergency Lighting (CTS 4.6.3)

Testing of the emergency lighting system is scheduled every 18 months, but this frequency is subject to review and modification based on experience. The 18-month cycle is compatible with the period of simulated loss-of-power tests. Emergency lighting, however, is not (a) used for detecting a degradation of the reactor coolant pressure boundary prior to a DBA, (b) used to monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient, or (c) part of a primary success path in the mitigation of a DBA or transient. Thus these requirements do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Therefore, it is acceptable to relocate this specification to the TRM.

The relocated specifications from the CTS discussed above are not required to be in the TS because they do not fall within the criteria for mandatory inclusion in the TS as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, appropriate controls have been established for all of the current specifications and information that are being moved to the SAR or TRM. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. Therefore, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, the specifications, as described in detail in this SE and the attached Table R, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's application dated January 28, 2000, as supplemented by the licensee's letters listed in Table 2 and .

F. Control of Specifications, Requirements, and Information Relocated from the CTS

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Sections 3.0.D and 3.0.E above. The facility and procedures described in the SAR, and TRM, which is a part of the SAR, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from the CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. For example, the Radioactive Effluent Controls Program can be changed in accordance with ITS 5.5.4, and the administrative instructions that implement the QA Program can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA Program for ANO-1 and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, will address the implementation of the ITS conversion, and the schedule for the relocation of the CTS requirements into licensee-controlled documents. The relocations to the SAR, which includes the TRM, shall be included in the next required update of this document in accordance with 10 CFR 50.71(e).

G. Evaluation of Other TS Changes (Beyond Scope Changes) Included in the Application for Conversion to ITS

This section addresses the beyond scope changes in which the licensee proposed changes to both the CTS and STS. The following beyond scope changes were addressed in the notice of consideration of amendment published in the *Federal Register* on , 2001 (66 FR).

The changes discussed below are listed in the order of the applicable ITS specification, as appropriate. Also provided are references to the associated discussion of change (DOC) to the

CTS and discussion of deviation (DOD) from the STS, given in the licensee's application, and the beyond scope change tracking number used by the staff in its review.

1. ITS 3.2.3, "Axial Power Imbalance Operating Limits" (DOC 3.2 - xx)

The licensee proposes to revise the completion time for Required Action B.1 from the 2 hours value in STS to 4 hours. Required Action B.1 calls for THERMAL POWER to be reduced to less than or equal to 40 percent if AXIAL POWER IMBALANCE is not restored within the associated completion time of Required Action A.2. Although the CTS established comparable required actions if the AXIAL POWER IMBALANCE exceeded operating limits, the CTS did not establish a completion time for those actions. Therefore, establishment of a required completion time is, in essence, more restrictive than the CTS. In addition, the 2 hour completion time included in STS would require operators to violate the established normal, non-emergency, maneuvering rate of less than or equal to 30 percent per hour, thereby unnecessarily challenging the operator's ability to control the unit. The 4 hour completion time allows a prompt compensatory action while providing a more reasonable time frame for performing the required power reduction to less than or equal to 40 percent of rated thermal power. Therefore, the proposed completion time increase to 4 hours is acceptable.

2. ITS 3.2.4, "Quadrant Power Tilt (QPT)" (DOC 3.2 - xx)

The licensee proposes to add an alternative completion time to Required Action A.1.2.2 (and Required Actions A.1.2.3 and A.1.2.4 carried over from the CTS) that clarify that the actions may be completed 10 hours after the last performance of SR 3.2.5.1 (Required Action A.1.1). A second completion time for requiring a reduction in nuclear overpower based on RCS flow and AXIAL POWER IMBALANCE is necessary in order to establish a completion time dependent on the performance of the surveillance allowed by Required Action A.1.1 and to be consistent with the allowable reduction in THERMAL POWER based on the SR that is included in Required Action A.1.2.1. Assume, for example, the licensee elected for some period of time to satisfy the Required Action by performing the surveillance referenced in Required Action A.1.1. The alternative completion times of 2 hours and 10 hours after the last performance of the surveillance are now needed in case the licensee elects to stop or is unable to continue the surveillance at the required frequency of once per 2 hours. The change is consistent with the guidance in Section 1.3 of STS on completion times. The clarification of the STS completion time requirements for LCO 3.2.4 is appropriate and acceptable.

The licensee proposes to revise the completion time for Required Actions C.1 and D.1 from the 2 hours value in STS to 4 hours. Required Actions C.1 and D.1 call for THERMAL POWER to be reduced to less than or equal to 20 percent if ACTION B is not completed within the allowed completion time of if QPT exceeds the maximum limit defined in the COLR. The CTS did not establish comparable required actions. Therefore, establishment of the required actions and associated completion times is, in essence, more restrictive than the CTS. In addition, the 2 hour completion time included in STS would require operators to violate the established normal, non-emergency, maneuvering rate of less than or equal to 30 percent per hour, thereby unnecessarily challenging the operator's ability to control the

unit. The 4 hour completion time allows a prompt compensatory action while providing a more reasonable time frame for performing the required power reduction to less than or equal to 20 percent of rated thermal power. Therefore, the proposed completion time increase to 4 hours is acceptable.

3. ITS 3.4.8, "Reactor Coolant System (RCS) Loops, MODE 5, Loops Not Filled" (DOC 3.4A - xx)

The licensee proposes to add a Required Action to "suspend all operations involving reduction in RCS water volume" if no required DHR [decay heat removal] loop is operable or a required DHR loop is not in operation. The Required Action is consistent with LCO Note 1.b which states that all required DHR pumps may be removed from operation for less than or equal to 1 hour provided that "No draining operations to further reduce the RCS water volume are permitted. (Note 1.a precludes adding coolant to the RCS with boron concentration less than that required to meet the SDM of LCO 3.1.1 when the required DHR pumps are temporarily removed from operation.) The change adds a requirement that is included in neither the CTS nor STS. The addition of an immediate action for an unplanned loss of DHR that corresponds to the constraints for a planned loss of the function is more restrictive than either the CTS or STS. The additional action minimizes risks of plant conditions degrading further while plant staff work to restore DHR in accordance with Required Action B.3. The staff finds the proposed change acceptable.

4. ITS 3.4.11, "Low Temperature Overpressure Protection (LTOP) System" (DOC 3.4B - xx)

The application identified the proposed ITS Section 3.4.11, "Low Temperature Overpressure Protection (LTOP) System," as beyond the scope of the conversion to ITS because the proposed ITS added to the requirements currently in the CTS but did not fully adopt the requirements in STS. The staff has reviewed the changes and found that the proposed ITS Section 3.4.11 is an acceptable combination of carrying forward the current licensing bases, including the CTS, adoption of STS, and variations from STS to address the hybrid nature of the resultant LTOP requirements in the ITS. The licensee has included adequate discussions in the Bases to describe plant-specific practices such as how instrument uncertainties were included or not included in specific values in the ITS. The licensee also used a combination of LCOs and notes that are different from STS, but which establish the needed requirements. The staff finds the proposed LCO 3.4.11 acceptable.

5. ITS 3.4.13, "RCS Operational LEAKAGE" (DOC 3.4B - xx)

The licensee proposed to adopt SR 3.4.13.1 from STS with modifications to incorporate changes proposed by TSTF-116, Rev. 2 and TSTF-061. SR 3.4.13.1 requires that an RCS water inventory balance be performed every 72 hours to measure leakage. The SR includes a note in the frequency column which states that the SR is only required to be performed during steady state operation. In addition, the SR in Revision 1 of NUREG-1430 includes a note in the surveillance column which states that the SR is not required to be performed in Mode 3 or 4 until 12 hours of steady state operation. The TSTF removed the note in the frequency column and revised the note in the surveillance column to read as follows, "Not required to be performed until 12 hours after establishment of steady state

operation." In addition, the licensee included a plant specific clarification of the conditions required for the performance on this SR by adding the words "at or near operating pressure" at the end of the note in surveillance column. This clarification is needed in order to ensure that the SR is reliable. The staff finds that the incorporation of TSTF-116, Rev. 2, and clarification added by the licensee maintains an adequate surveillance of RCS leakage and is acceptable.

6. ITS 3.5.2, "Emergency Core Cooling System (ECCS) - Operating" (DOC 3.5 - xx)

The proposed ITS 3.5.2, Action B requires that when there are one or more trains inoperable with less than 100 percent of the ECCS flow equivalent to a single operable ECCS train available, the plant must be placed in Mode 3 within 6 hours and reduce RCS temperature to less or equal to 350 °F within 12 hours. CTS and STS 3.5.2 of STS do not specify the required plant shutdown in Action B of the TS and instead, the plant will be required to enter LCO 3.0.3 under the above stated ECCS degraded conditions. In accordance with the LCO 3.0.3, when there are one or more trains inoperable with less than 100 percent of the ECCS flow equivalent to a single ECCS train available, the plant must be placed in Mode 3 within 7 hours and in Mode 4 with RCS temperature less than 350 F, the condition which the ITS 3.5.2 is not applicable, within 13 hours. Based on the above discussed shutdown requirements, the licensee proposed ITS will essentially achieve the same purposes as the requirements of LCO 3.0.3 with slightly more conservative completion times. Therefore, the proposed ACTION B of ITS 3.5.2 is acceptable.

7. ITS 3.6.3, "Reactor Building Isolation Valves" (DOC 3.6 - xx)

The licensee has proposed to not incorporate SR 3.6.3.6 regarding testing of containment purge valves with resilient seals from STS into the ITS. Although ANO-1 does not utilize resilient seated valves in its reactor building purge isolation system, the Bases for CTS 4.26 indicates that the test frequency for the installed valves is based on Generic Issue B-20, "Containment Leakage Due to Seal Deterioration," which addressed the increased potential for leakage from resilient seated valves. Since the CTS Bases conflict with installed equipment and the licensee is correcting the discrepancy during the conversion to the ITS, this proposed change was classified as a beyond scope change. Because the licensee has replaced the purge valves at ANO-1 with valves that do not have resilient seals, the staff finds that the technical concerns of Generic Issue B-20, STS 4.6.3.6, and CTS 4.26.2 no longer apply. Only the testing provisions of Section C.2 of Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," remain for the reactor building purge valves at ANO-1 and the licensee has adequately addressed this by the requirements included in ITS 5.5.16, "Reactor Building Leakage Rate Testing Program."

8. ITS 3.6.4, "Reactor Building Pressure" (DOC 3.6 - xx)

CTS 3.6.4 provides a lower limit for reactor building pressure of 5.5 inches mercury (Hg) vacuum. This corresponds to a pressure of approximately -2.7 psig. The licensee has proposed to incorporate a value of -1.0 psig as the lower reactor building pressure limit in ITS 3.6.4. STS shows this value as a bracketed value, indicating that the plant specific value should be used and that the associated Bases should describe this value as

preserving "the initial conditions assumed in the accident analyses for a loss of coolant accident (LOCA) or steam line break." Although the CTS limit of approximately -2.7 psig provides some margin between operations and the design limit of 3.0 psig, it does not address the initial conditions assumed for the plant's emergency core cooling evaluation model. As part of the conversion to the ITS, the licensee has proposed to adopt a more restrictive lower limit on pressure in order to be consistent with the Bases in STS. The staff finds that the licensee's proposal for a more restrictive requirement is consistent with the ITS Bases that the licensee has adopted from STS. The proposed requirement is also an improvement over the CTS in terms of ensuring that plant operations are consistent with assumed initial conditions in design bases accidents. The proposed change is acceptable.

9. ITS 3.7.1, "Main Steam Safety Valves (MSSVs)" (DOC 3.7 - xx)

This beyond scope issue is related to STS, STS 3.7.1, "Main Steam Safety Valves (MSSVs)" in which Figure 3.7.1-1 has been reformatted to be replaced by Table 3.7.1-1 providing limitations for operation with 2 or more (of the 8 total MSSVs per steam generator) inoperable MSSV per steam generator. CTS does not allow operation with more than 2 inoperable MSSVs. The staff has reviewed the proposed ITS Table 3.7.1 and concluded that the limitations presented in the proposed ITS Table 3.7.1 are consistent with that derived from the methodology applied in the STS Figure 3.7.1 and these limitations will assure that there is a sufficient amount of safety valve relief capacities at each allowable power level to protect main steam systems from a potential overpressurization. Also, the tabulation format in the proposed ITS 3.7.1 is consistent with that presented in TS Table 3.7.1 of NUREG-1431 and NUREG-1432, STS for Westinghouse and Combustion Engineering Plant respectively.

10. ITS 5.5.1, "Offsite Dose Calculation Manual (ODCM)" (DOC 5.0 - xx)

The licensee proposes to reference the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report by name only instead of adopting the STS convention of including report name and associated TS. The proposed change does not change an actual requirement but simply uses a different editorial convention. Reference to the reports without the cross reference to the related TS is sufficiently clear given the reports are described in TS Sections 5.6.2 and 5.6.3 as well as in applicable regulations. The staff finds the change acceptable.

11. ITS 5.2.2, "Unit Staff" (DOC 5.0 - xx)

The licensee proposes to replace reference to specific operator staffing requirements with a reference to the applicable regulation. TSTF-258, Revision 4 was incorporated into Revision 2 of STS and thereby made a similar change to the STS. The staff acknowledged in its changes to STS, Revision 2 that the TS need not reiterate the requirements defined in 10 CFR 50.54(m) and 50.54(k). The licensee's proposal to include reference to 10 CFR 50.54(m) in TS 5.2.2.b is similar to the addition of a similar reference to TS Section 5.3.2, "Unit Staff Qualifications," in NUREG-1430, Revision 2. The licensee's proposal as well as TS 5.3.2 in STS were added so that a reference to TS in 10 CFR 50.54(k) would remain valid. The licensee's proposal is an acceptable way to maintain the reference.

4.0. COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversion for ANO-1, the staff has relied upon the licensee commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table R, "Relocated Specifications and Removal of Details," attached to this SE. This table reflects the relocations described in the licensee's submittals on the conversion. The staff requested and the licensee submitted a license condition to make this commitment enforceable (see Section 5.0). Such a commitment from the licensee is important to the ITS conversion because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by regulations or other requirements (e.g., in accordance with 10 CFR 50.59).

5.0 LICENSE CONDITIONS

A license condition to define the schedule to begin performing the new and revised SRs after the implementation of the ITS is to be included in the license amendment issuing the ITS. This schedule is:

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

The staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule.

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are described in Table LA, "Removed Details," and Table R, "Relocated Specifications," attached to this safety evaluation, and in Section 3.0.D, "Removed Details," and Section 3.0.E, "Relocated Specifications," above. The license condition states that the relocations would be completed no later than December 31, 2001. This schedule is acceptable.

As a part of the ITS conversion, the licensee also proposed to move three existing license conditions to equivalent programmatic requirements in ITS Section 5.5, Programs and Manuals. The requirements of License Conditions 2.C.(5), Systems Integrity, 2.C.(6), Iodine Monitoring,

and 2.C.(7), Secondary Water Chemistry, will be retained in ITS 5.5.2, Primary Coolant Sources Outside Containment, ITS 5.5.3, Post Accident Sampling, and 5.5.10, Secondary Water Chemistry, respectively. These ITS programmatic administrative controls specifications are consistent with the STS and current plant practice; they also meet the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative, and is acceptable.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arkansas State official was notified of the proposed issuance of the ITS conversion amendment for ANO-1. The State official had [no] comments.

7.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on , 2001 (64 FR), for the proposed conversion of the CTSs to ITSs for ANO-1. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

With respect to other changes included in the application for conversion to Improve Technical Specifications the items change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments required by these other changes involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission issued proposed findings that the amendments required by these other changes involve no significant hazards consideration, and there has been no public comment on these findings published in the *Federal Register* on , 2001 (64 FR). Accordingly, these changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the implementation of these changes.

8.0 CONCLUSION

The ANO-1 ITS provides clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that the ITS for ANO-1 satisfy the guidance in the Final Policy Statement on TS improvements for nuclear power reactors with regard to the content of TS, and conform to the STS provided in NUREG-1430, Revision 1, with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. [On this basis, the NRC staff concludes that the proposed ITS for ANO-1 are acceptable.]

The NRC staff has also reviewed the plant-specific changes to the CTS as described in this SE. On the basis of the evaluations described herein for each of the changes, [the NRC staff also concludes that these changes are acceptable.]

[The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security, or to the health and safety of the public.]

- Attachments:
1. List of Acronyms
 2. Table A - Administrative Changes
 3. Table M - More Restrictive Changes
 4. Table L - Less Restrictive Changes
 5. Table LA - Removed Details
 6. Table R - Relocated Specifications

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List of Acronyms

AC	Air Conditioning or Alternating Current
AFD	Axial Flux Difference
AFW	Auxiliary Feedwater System
ANO	Arkansas Nuclear One
ANSI	American Nuclear Standards Institute
APSR	Axial Power Shaping Rod
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
PWR	Pressurized Water Reactor
BWOG	Babcock and Wilcox Owners Group
BWST	Borated Water Storage Tank
CCW	Component Cooling Water
CET	Core Exit Thermocouple
CFR	Code of Federal Regulations
CFT	Channel Functional Test or Core Flood Tank
COLR	Core Operating Limits Report
CRD	Control Rod Drive
CREACS	Control Room Emergency Air Conditioning System
CREFVS	Control Room Emergency Filtration Ventilation System
CRVS	Control Room Ventilation System
CRWA	Control Rod Withdrawal Accident
CST	Condensate Storage Tank
CTS	Current Technical Specification(s)
DBA	Design-Basis Accident
DC	Direct Current
DG	Diesel Generator
DNB	Departure from Nucleate Boiling
DOC	Discussion of Change (to the CTS)
DOD	Discussion of Difference (from the STS)
ECCS	Emergency Core Cooling System
ECP	Emergency Cooling Pond
EDG	Emergency Diesel Generator
EFIC	Emergency Feedwater Instrumentation and Controls
EFPD(Y)	Effective Full Power Days (Years)
EFW	Emergency Feedwater
EOI	Entergy Operations, Inc. (Entergy or Entergy Southwest)
EPA	Electrical Protection Assembly
ERV	Electromatic Relief Valve
ESAS	Engineered Safeguards Actuation System
ESFAS	Engineered Safety Features Actuation System
ETA	Electronic Trip Assembly
FP	Full Power
FR	Federal Register
FRTF	Fraction of Rated Thermal Power
FSBEHAVS	Fuel Storage Building Emergency Handling Area Ventilation System
GDC	General Design Criteria

GL	Generic Letter
HEPA	High Efficiency Particulate Air
Hz	Hertz
IRM	Intermediate Range Monitor
ISI	Inservice Inspection
IVSW	Isolation Valve Seal Water
ITS	Improved Technical Specification(s)
kV or KV	Kilovolt
kW or KW	Kilowatt
LCO	Limiting Condition for Operation
LHR	Linear Heat Rate
LLS	Low-Low Set
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power
LPCS	Low Pressure Core Spray
LPI	Low Pressure Injection
LPRM	Local Power Range Monitor
LSFT	Logic System Functional Test
LTOP	Low Temperature Overpressure Protection
MFIV	Main Feedwater Isolation Valve
MG	Motor Generator
MSIV	Main Steam Isolation Valve
MSSV	Main Steam Safety Valve
MTC	Moderator Temperature Coefficient
MWD/T	Megawatt Days/short Ton
NaOH	Sodium Hydroxide
NMC	Nuclear Management Company, LLC
NUMAC	Nuclear Measurement Analysis and Control
ODCM	Offsite Dose Calculation Manual
PAM	Post-Accident Monitoring
PIV	Pressure Isolation Valve
P/T	Pressure/Temperature
PORV	Power Operated Relief Valve
PRVS	Penetration Room Ventilation System
QA	Quality Assurance
QPTR	Quadrant Power Tilt Ratio
RAI	Request for Additional Information
RB	Reactor Building
RBM	Rod Block Monitor
RCIC	Reactor Core Isolation Cooling
RCP	Reactor Coolant Pump
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RSCS	Rod Sequence Control System

RTP	Rated Thermal Power
RWCU	Reactor Water Cleanup
RWM	Rod Worth Minimizer
RWST	Reactor Water Storage Tank
SCIV	Secondary Containment Isolation Valve
SDC	Shutdown Cooling
SDM	Shutdown Margin
SDV	Scram Discharge Volume
SE	Safety Evaluation
SER	Safety Evaluation Report
SFDP	Safety Function Determination Program
SFP	Spent Fuel Pool
SG	Steam Generator
SGT	Standby Gas Treatment
SLC	Standby Liquid Control
SR	Surveillance Requirement
SRM	Source Range Monitor
SRV	Safety Relief Valve
SSER	Supplemental Safety Evaluation Report
STS	Improved Standard Technical Specifications, NUREG-14310, Rev. 1
SW	Service Water
TRM	Technical Requirements Manual
TS	Technical Specification(s)
TSTF	Technical Specifications Task Force (re: generic changes to the STSs)
UHS	Ultimate Heat Sink
UPS	Uninterruptible Power Supply
SAR	ANO-1 Safety Analysis Report (Final SAR, or FSAR of 10 CFR 50.34(b))
V	Volt
VAC	Volts Alternating Current
VFTP	Ventilation Filter Test Program

Table A – Administrative Changes
ITS Section 1.0 - Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS definitions, given below as presented in the ITS: <div style="display: flex; justify-content: space-between;"> <div> RATED THERMAL POWER, OPERABLE-OPERABILITY, CHANNEL CALIBRATION, AXIAL POWER IMBALANCE, CORE OPERATING LIMITS REPORT, and Pressure Boundary LEAKAGE </div> <div> CORE ALTERATION, CHANNEL CHECK, QUADRANT POWER TILT, DOSE EQUIVALENT I-131, E-AVERAGE DISINTEGRATION ENERGY, </div> </div>	Section 1.1 Definitions	1, 1.1, 1.2, 1.2.6, 1.2.7, 1.3, 1.4, 1.5, 1.5.3, 1.5.4, 1.6, 1.6.1, 1.6.2, 1.10, 1.16, 3.1.4.1.a, 3.1.6.3.a
1.0 A2	Not used.	N/A	N/A
1.0 A3	Not used.	N/A	N/A
1.0 A4	Established MODES of Operation which are equivalent to the CTS Reactor Operating Conditions. Changes to component Applicability which are affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	MODE Definitions	1.2.1, 1.2.2, 1.2.4, 1.2.5, 1.2.6, 1.2.8
1.0 A5	Deleted RCS Pressure as a transition point in defining Cold Shutdown. This change is evaluated for those Specifications in which RCS pressure is of concern, on an individual basis with the Specification in the appropriate location in these tables.	Definition: MODE 5, MODE 6	1.2.1, 1.2.6
1.0 A6	Revised temperature transition point for RCS temperature defining CTS Hot Shutdown. Changes to Specification Applicability affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	Definition: MODE 4	1.2.2
1.0 A7	Revised the CTS definition of Hot Standby from operation <2% power to a subcritical condition. Changes to Specification Applicability affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	Definition: MODE 3	1.2.4
1.0 A8 open – see RAI 3.8.1-01	Revised the wording of the CTS definition of Operable-Operability from "necessary ... normal and emergency electrical power sources" to "normal or emergency power sources." This change is administrative when considered with CTS LCO 3.0.5, the incorporation of the "Safety Function Determination Program (SFDP)," and the incorporation of shutdown electrical specifications	Definition: OPERABLE- OPERABILITY	1.3

Table A – Administrative Changes
ITS Section 1.0 - Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A9	CTS definitions for Trip Test and Channel test are combined into a definition for CHANNEL FUNCTIONAL TEST.	Definition: CHANNEL FUNCTIONAL TEST	1.5.1, 1.5.2
1.0 A10	Those CTS definitions not utilized in the ITS have been deleted. The deletion of definitions is considered administrative as the definitions, by themselves, do not apply restrictions within the Technical Specifications. The implementation of these definitions by the Specifications determines whether the deletion of a definition is less restrictive. Implementing Specifications affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	N/A	1.2.3, 1.4, 1.4.1, 1.4.2, 1.4.3, 1.4.4, 1.4.5, 1.4.6, 1.5.5, 1.8, 1.11, 1.12, 1.13, 1.13, 1.14, 1.15
1.0 A11	Added definitions used in ITS but which do not exist in CTS. The addition of definitions is considered administrative as the definitions, by themselves, do not apply restrictions within the Technical Specifications. The implementation of these definitions by the Specifications determines whether the deletion of a definition is less restrictive. Implementing Specifications affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	MODES, ACTIONS, LEAKAGE, CONTROL RODS, AXIAL POWER SHAPING RODS, PHYSICS TESTS, THERMAL POWER, ALLOWABLE THERMAL POWER, SHUTDOWN MARGIN	N/A
1.0 A12	Revised the definition of Power Operation from the CTS wording which establishes the transition point based on neutron power to a transition point based on RATED THERMAL POWER.	MODE 1	1.2.5
1.0 A13	Revised the definition of Power Operation from the CTS wording which establishes the transition point of 2% rated power as indicated on the power range channels to a transition point of 5% RTP. Implementing Specifications affected by this change are discussed on an individual basis with the Specification in the appropriate location in these tables.	MODE 1	1.2.5

Table A – Administrative Changes
ITS Section 1.0 - Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A14	Revised the definition of Refueling Shutdown to the ITS MODE 6. Actual changes to plant conditions required because of this definition change are discussed on an individual basis with the Specification in the appropriate location in these tables.	MODE 6	1.2.6
1.0 A15	Revised the definition of Staggered Test Basis to the STS definition. Although the definitions define the test interval differently, the actual interval between performance of a given surveillance on a particular component remains the same.	STAGGERED TEST BASIS	1.9
1.0 A16	The CTS definition of Heat Balance Calibration has been deleted as a duplication of CHANNEL CALIBRATION for the power range instrumentation.	CHANNEL CALIBRATION	1.5.6
1.0 A17	Not used.	N/A	N/A
1.0 A18	Added ITS Section 1.2, Logical Connectors, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2	N/A
1.0 A19	Added ITS Section 1.3, Completion Times, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.3	N/A
1.0 A20	Added ITS Section 1.4, Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.4	N/A

Table A – Administrative Changes
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Safety Limits.	Section 2.0 Safety Limits	2.1, 2.2, 6.7, 6.7.1.b
2.0 A2	Incorporated NUREG 1430 Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	Section 2.0 Bases	2.1 Bases, 2.2 Bases, 4.3 Bases
2.0 A3	Deleted duplicate 10 CFR 50.36(c)(1) reporting requirement from the CTS.	Section 2.2.5 Safety Limit Violation	6.7.1.b
2.0 A4	Not used.	N/A	N/A

Table A – Administrative Changes
ITS Section 3.0 – Limiting Condition for Operation (LCO) and Surveillance Requirement (SR) Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS general applicability requirements for Limiting Conditions for Operation (LCOs) and Surveillances..	Section 3.0 LCO and SR Applicability	3.0.1 through 3.0.4 and 4.0.1 through 4.0.4
3.0 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	Section 3.0 LCO and SR Bases	3.0.1 through 3.0.4 Bases, 4.0.1 through 4.0.4 Bases
3.0 A3	Adopted STS LCO 3.0.5 into the ITS, providing guidance for returning inoperable equipment to operable status. This LCO is consistent with the ANO-1 operating philosophy that allows for administrative control of equipment when necessary to establish operability of the component(s) although not strictly provided for by the CTS.	LCO 3.0.5	N/A
3.0 A4	Adopted STS LCO 3.0.3 use of numerical operational modes (Mode 1, 2, 3, 4) into the ITS in place of CTS noun names (Hot Shutdown, Startup, etc.).	LCO 3.0.3, 1.1	3.0.3
3.0 A5	Adopted STS LCO 3.0.7 into the ITS, providing controls for implementation of existing special test exceptions. ITS LCO 3.0.7 is consistent with the intent of CTS special test exceptions and provides clarity only.	LCO 3.0.7	N/A
3.0 A6	Adopted STS LCO 3.0.1 use of operational modes into the ITS in place of CTS use of operating conditions.	LCO 3.0.1, 1.1	3.0.1
3.0 A7	Adopted STS LCO 3.0.2 wording into the ITS in place of CTS wording. The specification continues to provide guidance concerning LCO compliance.	LCO 3.0.2	3.0.2
3.0 A8	Adopted STS SR 3.0.1 requirements into the ITS in place of CTS 4.01 and part of CTS 4.0.3 requirements.	SR 3.0.1	4.0.1, 4.0.3
3.0 A9	Adopted STS SR 3.0.2 requirements into the ITS in place of CTS 4.0.2.	SR 3.0.2	4.0.2

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 A1	<p>Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS Section 3.1, Reactivity Control Systems.</p> <p>* Specification relocated to the Technical Requirements Manual (TRM).</p>	<ul style="list-style-type: none"> • 3.1.3 • SR 3.1.3.1 • 3.1.9 Title • 3.1.8, 3.1.9 • N/A* • 3.1.4 • 3.1.4 Required Action A.2.2.1 • 3.1.4 • 3.1.4, 3.1.6, 3.1.7 • 3.1.2 Title • 3.1.2 Applicability • 3.1.2 	<ul style="list-style-type: none"> • 3.1.7 • 3.1.7.2 • 3.1.8 Title • 3.1.8 Specification • 3.1.9 TSI reference • 3.5.2 Objective • 3.5.2.1.5 • Table 4.1-2 Title, Table 4.1-2 footnote <u>1</u>/ • 4.7 Title, 4.7.1 Title, 4.7.1 Applicability, 4.7.1 Objective • 4.9 Title • 4.9 Applicability • 4.9 Objective
3.1 A2	<p>Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.</p> <p>* Specification relocated to the Technical Requirements Manual (TRM).</p>	<ul style="list-style-type: none"> • B 3.1.1, B 3.1.5 • B 3.1.3 • B 3.1.8, B 3.1.9 • N/A* • B 3.1.4, B 3.1.5, B 3.1.6, B 3.1.8, and B 3.1.9 • B 3.1.4, B 3.1.6, and B 3.1.7 • B 3.1.2 	<ul style="list-style-type: none"> • 3.1.3 Bases • 3.1.7 Bases • 3.1.8 Bases • 3.1.9 Bases • 3.5.2 Bases • 4.7 Bases • 4.9 Bases
3.1 A3	For consistency with plant instrumentation and STS, 6.5% is used in the ITS to establish control rod and APSR misalignment. ITS Bases B 3.1.4 establishes that 9 inches and 6.5% are equivalent.	LCO 3.1.4, LCO 3.1.6	4.7.1.2
3.1 A4	Not used.	N/A	N/A

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 A5	Through adoption of ITS 3.1.5 and its associated actions, the allowance for continued operation of the unit with an inoperable and not fully withdrawn safety rod will be maintained. Due to the continuation of essentially equivalent requirements, this change is administrative in nature.	3.1.5 Required Action A.2	3.5.2.5.1
3.1 A6	Maintains the requirement that a control rod that cannot be exercised be declared inoperable.	SR 3.1.4.2, SR 3.0.1	4.7.1.3
3.1 A7	The requirements of CTS 3.1.3.2 and 3.1.8.3 are duplicates of CTS 3.1.2 and are therefore deleted. These requirements are consistent with ITS 3.4.3.	3.4.3	3.1.3.2, 3.1.8.3
3.1 A8	Maintains reactor trip setpoint requirement consistent with CTS during Physics Testing in Mode 2.	3.1.9.b	3.1.8.1.A, 3.1.8.1.B
3.1 A9	Explicitly states the required action to verify that the potential ejected rod worth of a misaligned rod is within the assumptions used in the rod ejection analyses. This requirement is considered implicit within CTS 3.5.2.3.	3.1.4 Required Action A.2.2.2	3.5.2.3
3.1 A10	Adopted ITS safety rod insertion limits predicated on an individual rod basis rather than the CTS group position basis. This translates to an equivalent requirement to have all safety rods fully withdrawn in Modes 1 and 2.	LCO 3.1.5 and 3.1.5 Applicability	3.1.3.5
3.1 A11	CTS 4.7.1.2 requires a misaligned control rod to be declared inoperable. Although ITS 3.1.4 and 3.1.6 differentiate between inoperable rods and misaligned rods, these Specifications provide appropriate actions to compensate for either case. This change maintains the intent of CTS 4.7.1.2, which is to ensure that the appropriate actions are taken in the event that a control rod or APSR becomes misaligned from its group average position.	LCO 3.1.4, LCO 3.1.6	4.7.1.2
3.1 A12	Adopted ITS 3.1.7 Actions Note, consistent with the CTS intent and existing plant practice.	LCO 3.1.7	4.7 Markup

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 A13	Deleted unnecessary CTS provision that allowed the control rod with the greatest deviation from the group average position to be evaluated first. This change is acceptable because of the conservative nature of ITS in addressing multiple control rod deviations from their group average position. The CTS requirement is unnecessary detail that has no safety benefit, and the ITS are equivalent to the CTS in intent and effect.	3.1.4, 3.1.6	4.7.1.2

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 A1	Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS Section 3.2, Power Distribution Limits. * Deleted by previous amendment to CTS.	<ul style="list-style-type: none"> • 3.2.4 Title • LCO 3.2.4 • 3.2.4 Required Action A.1.2.1 • 3.2.3 Title • 3.2.3 Applicability • LCO3.2.3 • LCO 3.2.3, LCO 3.2.4 • N/A* 	<ul style="list-style-type: none"> • 3.5.2.4 Title • 3.5.2.4.1 • 3.5.2.4.1 • 3.5.2.6 Title • 3.5.2.6.1 • 3.5.2.6.2 • 3.5.4 Title, Applicability, Objective • Table 4.1-1, Item 42
3.2 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases	<ul style="list-style-type: none"> • 3.2.1 Bases • 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5 Bases • 3.2.3, 3.2.4 Bases, TRM 	<ul style="list-style-type: none"> • 3.1.3 Bases • 3.5.2 Bases • 3.5.4 Bases
3.2 A3	Explicitly establishes a required final power level for the Condition when Axial Power Imbalance is not within limits and the Required Action and associated Completion Time are not met, consistent with CTS intent and existing plant practice.	3.2.3 Required Action B.1	3.5.2.6.4
3.2 A4	<p>Removed CTS 3.5.2.4.2.b reference to APSR withdrawal limits because the limits are not power dependent and the CTS action has no effect on positioning of APSRs.</p> <p>Clarified that the reference to control rod group refers to regulating rods only since safety rods are required to be fully withdrawn per CTS 3.1.3.5.</p> <p>Modified the term reactor power imbalance to read operational power imbalance for consistency with the title of the figure in the COLR.</p> <p>CTS 3.5.2.4.2.b and CTS 3.5.2.4.2.c were modified to add references to the COLR as the location of the setpoints, since these setpoints were moved to the COLR by CTS Amendment 31.</p>	3.2.4 Required Action A.1.2.3, 3.2.4 Required Action A.1.2.4	3.5.2.4.2.b, 3.5.2.4.2.c

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 A5	Not used	N/A	N/A
3.2 A6	Deleted exception for exercising APSRs. This exception is not retained in the ITS because the ITS will not require freedom of movement demonstrations (exercising) for APSRs, since APSRs do not insert on a reactor trip. This change is consistent with the intent of the CTS and STS. This exception is not needed in the ITS.	LCO 3.2.2	3.5.2.5.4
3.2 A7	Adopted Applicability of Mode 1 with Thermal Power > 20% RTP for STS 3.2.5, Power Peaking limits, consistent with the CTS.	3.2.5 Applicability	4.1.d
3.2 A8	Adopted STS 3.2.1 Applicability of Modes 1 and 2 for the LCO requiring regulating rods to be within insertion, sequence, and overlap limits, consistent with the intent of the CTS and current plant practice.	3.2.1 Applicability	3.1.3.5
3.2 A9	Adopted STS 3.2.4 Applicability of Mode 1 with Thermal Power > 20% for the requirement to maintain Quadrant Power Tilt within the limits specified in the COLR, consistent with the intent of the CTS.	3.2.4 Applicability	3.5.2.4.4

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes for CTS requirements for RPS Instrumentation .</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p> <p>** Note (a) of ITS Table 3.3.3-1 was adopted since the parameter(s) cannot and is not required to perform its function when in Shutdown Bypass. This is consistent with the current ANO-1 application of these functions.</p>	<ul style="list-style-type: none"> • 3.3.1 Bases Background • Table 3.3.1-1 • Table 3.3.1-1 Function 1.a and 1.b • Table 3.3.1-1 Function 8 • Table 3.3.1-1 Function 7 • Table 3.3.1-1 Function 3 and 11 • Table 3.3.1-1 Function 4 • Table 3.3.1-1 Function 5 • Table 3.3.1-1 Function 2 • Table 3.3.1-1 Function 6 • Table 3.3.1-1 Note (a)** • Bases (all) 3.3.1, 3.3.4, and 3.3.10 • Table 3.3.3-1 • Table 3.3.3-1 Function 10 • Table 3.3.3-1 Function 9 • N/A* • 3.3.1 Applicability • LCO 3.3.1 • LCO 3.3.2 • Table 3.3.1-1 Function 1a • LCO 3.3.10 • LCO 3.3.9 • Table 3.3.1-1 Function 2 • Table 3.3.1-1 Function 5 • Table 3.3.1-1 Function 8 • Table 3.3.1-1 Function 3 • Table 3.3.1-1 Function 4 • Table 3.3.1-1 Function 7 • Table 3.3.1-1 Function 6 	<ul style="list-style-type: none"> • 2.3 • Table 2.3-1 • Table 2.3-1, Nuclear Power • Table 2.3-1, Nuclear Power (flow) • Table 2.3-1, Nuclear Power (pump) • Table 2.3-1, High RC Pressure • Table 2.3-1, Low RC Pressure • Table 2.3-1, Variable Low RC Pressure • Table 2.3-1, RC Temperature • Table 2.3-1, High RB Pressure • N/A • 3.5.1 • 3.5.1.9 • 3.5.1.9.1 • 3.5.1.9.2 • 3.5.1.10 • Table 3.5.1-1 • Table 3.5.1-1 • Table 3.5.1-1 Functional Unit 1 • Table 3.5.1-1 Functional Unit 2 • Table 3.5.1-1 Functional Unit 3 • Table 3.5.1-1 Functional Unit 4 • Table 3.5.1-1 Functional Unit 5 • Table 3.5.1-1 Functional Unit 6 • Table 3.5.1-1 Functional Unit 7 • Table 3.5.1-1 Functional Unit 8a • Table 3.5.1-1, Functional Unit 8b • Table 3.5.1-1 Functional Unit 9 • Table 3.5.1-1 Functional Unit 10

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A1 (continued)	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes for CTS requirements for RPS Instrumentation .</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • Table 3.3.1-1 Function 10 • Table 3.3.1-1 Function 9 • LCO 3.3.4 • 3.3.1 Required Action B.1 • 3.3.4 Required Actions B.1 and B.2 • N/A* • SR Bases for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10 • SR 3.3.3.1 • SR 3.3.4.1 • Table 3.3.1-1 Function 2 • Table 3.3.1-1 Function 3 • Table 3.3.1-1 Function 4 • Table 3.3.1-1 Function 8 • Table 3.3.1-1 Function 5 • Table 3.3.1-1 Function 7 • 3.3.9 • Table 3.3.1-1 Function 6 • N/A* • N/A* • SR 3.3.2.1 • SR 3.3.4.1 	<ul style="list-style-type: none"> • Table 3.5.1-1 Functional Unit 11 • Table 3.5.1-1 Functional Unit 12 • Table 3.5.1-1 Functional Unit 14 • Table 3.5.1-1 Note 6 • Table 3.5.1-1 Note 24 • Table 3.5.1-1 Note 27 • 4.1 • Table 4.1-1 Item 1 • Table 4.1-1 Item 2 • Table 4.1-1 Item 7 • Table 4.1-1 Item 8 • Table 4.1-1 Item 9 • Table 4.1-1 Item 10 • Table 4.1-1 Item 11 • Table 4.1-1 Item 12 • Table 4.1-1 Item 6, Remark (1) • Table 4.1-1 Item 13 • Table 4.1-1 Item 31 • Table 4.1-1 Item 42 • Table 4.1-1 Item 44 • Table 4.1-1 Item 62
3.3A A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> • Bases for 3.3.1 Background • Bases for 3.3.1 References • Bases for 3.3.1, 3.3.4, and 3.3.10 • SR Bases for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10 • SR Bases Reference for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10 	<ul style="list-style-type: none"> • 2.3 Bases • 2.3 Reference • 3.5.1 Bases • 4.1 Bases • 4.1 Reference

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A3	Specifications and tables depicting Reactor Protection System instrumentation requirements are reformatted and replaced with the applicable ITS requirements. Technical changes are documented in the appropriate Discussion of Change (DOC) related to the applicable requirement.	<ul style="list-style-type: none"> • LCO 3.3.1, LCO 3.3.4, LCO 3.3.10, and Required Actions for 3.3.1, 3.3.4, and 3.3.10 • LCO 3.3.1, LCO 3.3.4, LCO 3.3.10, and Required Actions for 3.3.1, 3.3.4, and 3.3.10 • 3.3.1 Required Action B.1 • LCO 3.3.1, LCO 3.3.4, LCO 3.3.9, LCO 3.3.10, and Required Actions for 3.3.1, 3.3.4, 3.3.9, and 3.3.10 • SRs for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10 • SRs for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10, and Table 3.3.1-1 	<ul style="list-style-type: none"> • 3.5.1.1 • 3.5.1.2 • 3.5.1.3 • Table 3.5.1-1 Columns 3 and 5, and table notes • 4.1 Specification a, b, and c • Table 4.1-1
3.3A A4	ITS surveillance frequencies are incorporated in lieu of the CTS surveillance frequencies. The incorporation of the ITS wording and format is limited to presentation only and does not result in changes to actual requirements.	SRs for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10	Table 4.1-1 Note
3.3A A5	The CTS requirement to perform heat balance calibrations "daily under non-steady state operating conditions" is retained in ITS SR 3.3.1.2 requiring the calibration once every 24 hours after $\geq 10\%$ thermal power changes. The ITS SR is consistent with the current ANO-1 application of the CTS requirement.	SR 3.3.1.2	Table 4.1-1 Item 3 Remark (1)

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A6	The presentation of the requirements for power range nuclear instruments is changed to be consistent with ITS Table 3.3.1-1 which addresses the individual trip functions that are actuated by the power range nuclear instruments.	<ul style="list-style-type: none"> • Table 3.3.1-1 Function 1.a • Table 3.3.1-1 Functions 1.a and 8 	<ul style="list-style-type: none"> • Table 3.5.1-1 Functional Unit 2 • Table 4.1-1 Item 4
3.3A A7	The Minimum Degree of Redundancy column of CTS Table 3.5.1-1 is omitted since the intent of the column is consistent with the Minimum Channels Operable column.	Table 3.3.1-1	Table 3.5.1-1 Column 4
3.3A A8	The ITS requirement of 8 Electronic Trip Assembly (ETA) relays is applied in place of the equivalent CTS requirement of 2 Channels in each of 4 ETA relays.	LCO 3.3.4	Table 3.5.1-1 Functional Unit 13
3.3A A9	ITS 3.3.4 Actions Note allowing separate condition entry for each CRD trip device is adopted in lieu of the similar allowance in CTS Table 3.5.1-1 Notes 24 and 25.	3.3.4 Actions Note	Table 3.5.1-1 Notes 24 and 25
3.3A A10	The Note modifying ITS SR 3.3.1.5 is adopted, excluding neutron detectors from Channel Calibrations. This is consistent with the current application at ANO-1 for instrument Channel Calibrations due to the passive design of the detectors, the extreme difficulty accessing the detectors and generating a appropriate input signal to the detectors, and because no specific adjustments can be made to the detectors.	SR 3.3.1.5 Note	Table 4.1-1 Item 4

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A11	The CTS testing requirements for the Power Range Channel and the Flux-Reactor Coolant Flow Comparator have been applied to each related appropriate function in ITS Table 3.3.1-1. Since by definition the Channel Calibration includes the Channel Functional Test, the CTS requirement to perform the Channel Functional Test on the same frequency as the Channel Calibration is not retained, in favor of the ITS format and frequencies.	Table 3.3.1-1 Functions 1.a and 8, SR 3.3.1.1, SR 3.3.1.3, SR 3.3.1.4, and SR 3.3.1.5	Table 4.1-1 Item 4 and Item 10
3.3A A12	The ITS high reactor building pressure trip allowable value of ≤ 18.7 psia has been conservatively adopted in lieu of the CTS requirement of "equivalent to" 18.7 psia. The adoption of this value ensures the function will be performed at a value equal to or conservative to its allowable value.	Table 3.3.1-1 Function 6	Table 2.3-1, High reactor building pressure
3.3A A13	The allowance provided by CTS Table 3.5.1-1 Note 24, part "b" is not adopted into the ITS due to the design of the CRD trip breakers, which do not contain a bypass feature.	3.3.4	Table 3.5.1-1 Note 24.b
3.3A A14	Not Used	N/A	N/A
3.3A A15	Not Used	N/A	N/A
3.3A A16	Not Used	N/A	N/A
3.3A A17	The CTS allowance to operate continuously with a RPS function having one channel in bypass and one channel in trip is retained in ITS 3.3.1 Condition B. However, the CTS allowance to not place the second channel in trip is retained and provided by the allowances of ITS 3.0.5.	LCO 3.0.5	Table 3.5.1-1 Notes 4 and 6

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A A18	The ITS requirement to perform heat balance calibrations every 96 hours or if the deviation from the power range channel output is greater than 2% is adopted in lieu of the CTS requirement of twice weekly. The roughly equivalent test frequency provides consistency with STS format and the adoption of the 2% calibration criteria is consistent with current ANO-1 practice although not specifically identified in the CTS.	SR 3.3.1.2	Table 4.1-1 Item 3

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
B. Engineered Safeguards Actuation System (ESAS), ITS 3.3.5, 3.3.6, and 3.3.7

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3B A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Engineered Safeguards Actuation System (ESAS) Instrumentation.	<ul style="list-style-type: none"> • 3.3.5, 3.3.6, 3.3.7 • 3.3.7 Required Action A.2 • 3.3.5, Table 3.3.5-1 Parameters 2 and 3 • SRs for 3.3.5, 3.3.6, and 3.3.7 • SR 3.3.6.1 	<ul style="list-style-type: none"> • 3.5.1 • Table 3.5.1-1 Note 8 • 3.5.3 • 4.1 • Table 4.1-1 Channel Description 43.a
3.3B A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> • Bases for 3.3.5, 3.3.6, and 3.3.7 • 3.3.5 Bases 	<ul style="list-style-type: none"> • Bases for 3.5 and 4.1 • 3.5.3 Bases
3.3B A3	Specifications and tables depicting Engineered Safeguards Actuation System (ESAS) instrumentation requirements are reformatted and replaced with the applicable ITS requirements. Technical changes are documented in the appropriate Discussion of Change (DOC) related to the applicable requirement.	3.3.5, 3.3.6, and 3.3.7	3.5.1.1, 3.5.1.2, Table 3.5.1-1 Columns 3 and 5, Table 3.5.1-1 Notes, 4.1.a, 4.1.b, Table 4.1-1
3.3B A4	ITS surveillance frequencies are incorporated in lieu of the CTS surveillance frequencies. The incorporation of the ITS wording and format is limited to presentation only and does not result in changes to actual requirements.	SRs for 3.3.5, 3.3.6, and 3.3.7	Table 4.1-1 Note
3.3B A5	ITS 3.3.5, 3.3.6, and 3.3.7 ACTIONS Note allowing separate condition entry for each inoperable component is adopted to be consistent with the use and application of CTS Table 3.5.1-1.	ACTIONS Note for 3.3.5, 3.3.6, 3.3.7	Table 3.5.1-1
3.3B A6	The presentation of the requirements for instrument channels is changed to be consistent with STS. Three operable instrument channels remain required which is consistent with the CTS.	3.3.5	Table 3.5.1-1 Functional Units 1.a, 1.b, 2.a, 2.b, 3.a, 4.a, and 5.a
3.3B A7	The Minimum Degree of Redundancy column of CTS Table 3.5.1-1 is omitted since the intent of the column is consistent with the Minimum Channels Operable column.	3.3.5, 3.3.6, and 3.3.7	Table 3.5.1-1 Column 4

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
B. Engineered Safeguards Actuation System (ESAS), ITS 3.3.5, 3.3.6, and 3.3.7

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3B A8	CTS Table 3.5.1-1 requirements for ESAS manual trip pushbuttons are reformatted and moved to ITS 3.3.6.	3.3.6	Table 3.5.1-1 Functional Units 1.c, 2.c, 3.c, 4.b, and 5.b
3.3B A9	ITS 3.3.7 is adopted in lieu of CTS Table 3.5.1-1 Functional Units 1, 2, 3, 4, and 5 since the logic channels associated with these functional units are treated as limiting conditions for operation at ANO-1.	3.3.7	Table 3.5.1-1 Functional Units 1, 2, 3, 4, and 5
3.3B A10	Since the ANO-1 ESAS design results in ESAS Manual Trip Function Logics be tested during the CHANNEL FUNCTIONAL TESTS for each individual actuation logic, the requirements of CTS Table 4.1-1 Item 43.b are contained within ITS SR 3.3.7.1.	SR 3.3.7.1	Table 4.1-1 Item 43.b
3.3B A11	The ITS requirement to perform a CHANNEL CHECK of the reactor building pressure high-high instrument channels is adopted since this check is currently performed at ANO-1 by performing the required CHANNEL CHECK of the reactor building pressure high channels (same transmitters provide inputs to both of these functions).	SR 3.3.5.1	Table 4.1-1 Item 21.a
3.3B A12	The revised Applicabilities (see Section 3.3B DOC L1) for the High Reactor Building Pressure and Low Reactor Coolant System Pressure Functional Units do not require operability of these functions during reactor building leak rate testing and, therefore, the allowance of CTS 3.5.3 for bypassing these functions during leak rate testing is omitted.	Table 3.3.5-1 Parameters 1, 2, and 3	3.5.3
3.3B A13	Not Used (Change approved by Amendment 207)	N/A	N/A
3.3B A14	CTS 4.1.c is omitted since it is redundant to the requirements of 10 CFR 50, Appendix B, Criteria XI, XVI, and XVII.	N/A	4.1.c

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3C A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Emergency Feedwater Initiation and Control (EFIC) Instrumentation.</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • 3.3.11, 3.3.12, 3.3.13 • N/A* • 3.3.11 ACTION B • 3.3.11 Required Actions D.1 and F.1, 3.3.12 Required Actions D.1 and E.1, 3.3.13 Required Actions B.1 and C.1 • SRs for 3.3.11, 3.3.12, 3.3.13 • N/A* 	<ul style="list-style-type: none"> • 3.5.1 • 3.5.1.10 • Table 3.5.1-1 Reference to Note 6 • Table 3.5.1-1 Note 1 • 4.1 • Table 4.1-1 Channel Description 52
3.3C A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	3.3.11, 3.3.12, and 3.3.13 Bases	3.5 and 4.1 Bases
3.3C A3	Specifications and tables depicting EFIC instrumentation requirements are reformatted and replaced with the applicable ITS requirements. Technical changes are documented in the appropriate Discussion of Change (DOC) related to the applicable requirement.	3.3.11, 3.3.12, 3.3.13, and 3.3.14	3.5.1.1, 3.5.1.2, Table 3.5.1-1 Columns 3 and 5, Table 3.5.1-1 Notes, 4.1.a, 4.1.b, and Table 4.1-1
3.3C A4	ITS surveillance frequencies are incorporated in lieu of the CTS surveillance frequencies. The incorporation of the ITS wording and format is limited to presentation only and does not result in changes to actual requirements.	SRs for 3.3.11, 3.3.12, 3.3.13, and 3.3.14	Table 4.1-1 Note
3.3C A5	ITS 3.3.11, 3.3.12, and 3.3.13 ACTIONS Note and 3.3.11 SR Note allowing separate condition entry for each inoperable component and providing reference to applicable SRs for each function is adopted to be consistent with the use and application of CTS Table 3.5.1-1.	ACTIONS Note for 3.3.11, 3.3.12, 3.3.13 and SR Note for 3.3.11	Table 3.5.1-1
3.3C A6	Not Used.	N/A	N/A
3.3C A7	The Minimum Degree of Redundancy column of CTS Table 3.5.1-1 is omitted since the intent of the column is consistent with the Minimum Channels Operable column.	3.3.11, 3.3.12, 3.3.13, and 3.3.14	Table 3.5.1-1 Column 4

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3C A8	Adopted the ITS Applicability for Steam Generator (SG) Low EFIC functions of Modes 1, 2, and 3 when SG pressure is ≥ 750 psig which is consistent with the CTS Applicability of when SG pressure exceeds 750 psig since this pressure is exceeded while in Mode 3.	Table 3.3.11-1 Functions 1.c and 3.a	3.5.1.15.a and 3.5.1.16
3.3C A9	Adopted the ITS format of " \geq " in lieu of the CTS format of "exceeds" or "greater than" since a parameter at the limit compared to slightly above the limit is essentially imperceptible.	Table 3.3.11-1	3.5.1.15 and 3.5.1.16
3.3C A10	EFIC channel testing requirements of CTS Table 4.1-1 Items 56.d and 56.e are omitted since this equipment was never installed at ANO-1.	N/A	Table 4.1-1 Items 56.d and 56.e
3.3C A11	CTS Table 3.5.1-1 Notes for EFIC Functional Units 1.b, 1.c, 1.d, 1.e, 2.b, and 3.b have been replaced with the format of ITS 3.3.11 ACTIONS and Functions 1.a, 1.b, 1.c, 1.d, and 3.a of Table 3.3.11-1.	3.3.11 ACTIONS and Table 3.3.11-1 Functions 1.a, 1.b, 1.c, 1.d, and 3.a	Table 3.5.1-1 Functional Units 1.b, 1.c, 1.d, 1.e, 2.b, and 3.b
3.3C A12	Not Used	N/A	N/A
3.3C A13	Omitted the unnecessary phrase "which are bypassed at cold shutdown conditions" of CTS 3.1.15 since these functions are not required to be operable in cold shutdown (Mode 5).	3.3.11	3.5.1.15
3.3C A14	Not Used	N/A	N/A
3.3C A15	Not Used	N/A	N/A
3.3C A16	Not Used	N/A	N/A
3.3C A17	CTS 4.1.c is omitted since it is redundant to the requirements of 10 CFR 50, Appendix B, Criteria XI, XVI, and XVII.	N/A	4.1.c

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3D A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for the diesel generator loss of power start instrumentation function (ITS 3.3.8), post accident monitoring instrumentation (ITS 3.3.15), and the control room isolation on a high radiation signal instrumentation function (ITS 3.3.16).</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • 3.3.15 • 3.3.15, 3.3.16 • N/A* • 3.3.16 • 3.3.8, 3.3.15, 3.3.16 • N/A* • LCO 3.3.8 • 3.3.15 Required Action E.1 and SR Note • SRs for 3.3.8, 3.3.15, 3.3.16 • N/A* • N/A* 	<ul style="list-style-type: none"> • 3.3, 3.3.6, 3.3.7(A) • 3.5 • 3.5.1.10 • 3.5.1.13 • Notes for Table 3.5.1-1 Functional Units 2, 3, 8.a, 8.b, 10, 11, 12, 13, 15, and 16 • Table 3.5.1-1 Functional Unit 9 • 3.7.1.F • 3.14 • 4.1 • Table 4.1-1 Channel Description 31, 42, 52 • 6.12.5 a, c, f, g, h, and i
3.3D A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	3.3.8, 3.3.15, and 3.3.16 Bases	3.3, 3.5, 3.14, 4.1, and 4.12 Bases
3.3D A3	Specifications and tables depicting instrumentation requirements are reformatted and replaced with the applicable ITS requirements. Technical changes are documented in the appropriate Discussion of Change (DOC) related to the applicable requirement.	3.3.8, 3.3.15, 3.3.16	3.5.1.1, 3.5.1.2, Table 3.5.1-1 Columns 3 and 5, Table 3.5.1-1 Notes, 4.1.a, 4.1.b, Table 4.1-1
3.3D A4	ITS surveillance frequencies are incorporated in lieu of the CTS surveillance frequencies. The incorporation of the ITS wording and format is limited to presentation only and does not result in changes to actual requirements.	SRs for 3.3.8, 3.3.15, and 3.3.16	Table 4.1-1 Note
3.3D A5	The CHANNEL FUNCTIONAL TEST for Degraded Voltage Monitoring Functions in the CTS is omitted as a specific line item since it is performed at the same frequency as and is included in the CHANNEL CALIBRATION of ITS SR 3.3.8.2	SR 3.3.8.2	Table 4.1-1 Item 37

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3D A6	Adopted ITS 3.3.15 ACTIONS Note 2 to allow separate condition entry for Post Accident Monitor (PAM) functions since these functions were located in separate specifications within the CTS.	3.3.15 ACTIONS Note 2	Various specifications from which PAM functions were relocated from during conversion. See DOC 3.3D – A1.
3.3D A7	The Minimum Degree of Redundancy column of CTS Table 3.5.1-1 is omitted since the intent of the column is consistent with the Minimum Channels Operable column.	3.3.8, 3.3.15, and 3.3.16	Table 3.5.1-1 Column 4
3.3D A8	ITS 3.3.8 ACTIONS Note allowing separate condition entry for each inoperable component is adopted to be consistent with the use and application of CTS Table 3.5.1-1.	3.3.8 ACTIONS Note	Table 3.5.1-1
3.3D A9	Adopted the ITS 3.3.8 Applicability of Modes 1, 2, 3, and 4 for the loss of power function. This Applicability was implied by CTS Table 3.5.1-1 Note 14 in requiring a shutdown to Cold Shutdown (Mode 5) during conditions of inoperability.	3.3.8 Applicability	Table 3.5.1-1 Functional Unit 8.a, and Note 14
3.3D A10	Adopted the ITS 3.3.8 Applicability of Modes 1, 2, 3, and 4 for the degraded voltage function. This Applicability was implied by CTS Table 3.5.1-1 Note 14 in requiring a shutdown to Cold Shutdown (Mode 5) during conditions of inoperability.	3.3.8 Applicability	Table 3.5.1-1 Functional Unit 8.b, and Note 14
3.3D A11	Not Used.	N/A	N/A
3.3D A12	Not Used.	N/A	N/A
3.3D A13	Not Used.	N/A	N/A
3.3D A14	CTS 4.1.c is omitted since it is redundant to the requirements of 10 CFR 50, Appendix B, Criteria XI, XVI, and XVII.	SRs for 3.3.8, 3.3.15, and 3.3.16	4.1.c
3.3D A15	Not Used. (Change approved by Amendment 205)	N/A	N/A

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4A A1	Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS section 3.4A, Reactor Coolant System.	<ul style="list-style-type: none"> • LCO 3.4.4 • Section 3.4 LCOs and SRs • 3.4.5 Applicability • 3.4.5 Applicability • 3.4.5 Required Action B.1 • 3.4.3 Required Action C.2 • 3.4.2 Required Action A.1, 3.4.3 Required Action C.1 • 3.4.4 and 3.4.5 Applicability • SR 3.4.5.1, SR 3.4.6.1 	<ul style="list-style-type: none"> • Table 2.3-1 Column 1 Heading • 3.1, 4.27 • 3.1.1.2.A • 3.1.1.5.A • 3.1.1.5.B • 3.1.2.6 • 3.1.3.7 • 3.4.1 • 4.27.4
3.4A A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	Section 3.4 Bases (as applicable)	2.1, 3.1.1, 3.1.2, 3.1.3, and 3.1.5 Bases
3.4A A3	The CTS requirement to ensure adequate Reactor Coolant System (RCS) flow during reductions of RCS boron concentration are retained in the ITS. The CTS actions are not, however, retained for Modes 1 and 2 since a loss of flow will result in a reactor trip and prompt entry into Mode 3 conditions.	LCO 3.4.5, LCO 3.4.6, LCO 3.9.1, LCO 3.9.4, LCO 3.9.5, LCO 3.4.4, 3.4.5 ACTION, 3.4.6 ACTION, 3.9.1 ACTION, 3.9.4 ACTION, 3.9.5 ACTION	3.1.1.1.B, 3.1.1.5.B
3.4A A4	The CTS equivalent applicability for RCS loop operability is retained in the ITS. The CTS actions are not, however, retained for Modes 1 and 2 since a loss of flow will result in a reactor trip and prompt entry into Mode 3 conditions.	LCO 3.4.5, LCO 3.4.4, and 3.4.5 Applicability	3.1.1.5.A
3.4A A5	The CTS requirement to be in Cold Shutdown when insufficient decay heat removal loops are operable is not retained in the ITS since the unit is already in the equivalent Mode 5 condition.	N/A	3.1.1.6.A
3.4A A6	The CTS 3.1.2.6 statement "the provisions of Specification 3.0.3 are not applicable" is not retained in the ITS since ITS LCO 3.0.3 is not applicable in other than Modes 1, 2, 3, and 4.	N/A	3.1.2.1

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4A A7	The CTS requirement to place the unit in Cold Shutdown (Mode 5) when RCS pressurization, heatup, or cooldown limits are violated is retained in the ITS with the exception of the direction to cooldown within the aforementioned limits as this is redundant to the LCO and Applicability of the specification.	3.4.3 Required Action C.2	3.1.2.6
3.4A A8	The CTS requirement for the minimum temperature for criticality of "above 525°F" is replaced with the essentially equivalent ITS value of $\geq 525^{\circ}\text{F}$.	LCO 3.4.2	3.1.3.1
3.4A A9	The "restore...within limits" statement in the CTS regarding minimum conditions for criticality is not retained in the ITS since restoration of compliance is always an option to the licensee and is not normally stated in individual specifications.	N/A	3.1.3.7
3.4A A10	Not used.	N/A	N/A
3.4A A11	CTS 3.1.2.2 regarding RCS leak tests is not retained in the ITS since it solely requires compliance with other requirements that are already in effect and otherwise applicable.	N/A	3.1.2.2
3.4A A12	The Applicability for decay heat removal requirements in the CTS is separated into separate conditions in the ITS of Mode 4, Mode 5 with RCS loops filled, and Mode 5 with RCS loops not filled.	LCO 3.4.6, LCO 3.4.7, and LCO 3.4.8	3.1.1.6
3.4A A13	Not used.	N/A	N/A
3.4A A14	Adopted the ITS allowance for Reactor Coolant Pumps (RCP) and decay heat removal (DHR) pumps to be "removed from service" in lieu of the CTS allowance that the pumps may be "de-energized."	LCO 3.4.6 Note, LCO 3.4.7 Note 1, and LCO 3.4.8 Note 1	3.1.1.6 Note *
3.4A A15	The ITS Applicability for RCS pressure and temperature limits of "at all times" is adopted in lieu of the similar implied, but not specifically stated Applicability of CTS 3.1.2.	3.4.3 Applicability	N/A

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4A A16	CTS RCS temperature limitations to maintain RCS parameters to the right of the pressure-temperature curve is revised to be applicable only during physics testing since the 525°F minimum temperature for criticality of ITS 3.1.9 ensures RCS parameters remain well clear of the curve during normal operations (when physics testing is not in progress).	<ul style="list-style-type: none"> • SR 3.4.3.1, SR 3.4.3.2 • SR 3.4.3.4 	<ul style="list-style-type: none"> • 3.1.2.3 • 3.1.3.2
3.4A A17	Adopted ITS action to place the plant in a non-applicable mode when the required RCPs are not operable where the CTS provided no specific action other than a default to CTS 3.0.3.	3.4.4 Required Action B.1	3.1.1.1.A
3.4A A18 open	Page 40 of the CTS is not yet approved in current form and is dependent on expected NRC approval of the January 27, 2000 LAR related to Q Condensate Storage Tank Level.	3.7.6	3.4.1.3

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4B A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Reactor Coolant Systems (Auxiliaries).</p> <p>* Deleted by previous Amendment to CTS.</p>	<ul style="list-style-type: none"> • 3.4.10 Applicability • 3.4.10, Required Action B.1 • 3.4.9 Applicability • 3.4.9 Required Action B.1 • N/A* • 3.4.14 Required Actions C.1, and C.2 • 3.4.14 Required Action A.1 • SR 3.4.14.1 • 3.4.14 Applicability • N/A* • 3.4.14 Condition C • 3.4.14 Condition C • N/A* • SR 3.4.14.1 	<ul style="list-style-type: none"> • 3.1 Applicability, 3.1 Objective • 3.1.1.3.A • 3.1.3.4 • 3.1.3.7 • 3.1.6.4 • 3.1.6.9 • 3.1.6.9 footnote • Table 3.1.6.9 • 3.5.1 Applicability & Objective • 3.5.1.10 • Table 3.5.1-1 “Other Safety Related Systems”, Item 1 • Table 3.5.1-1, Notes 1 & 5 • Table 4.1-1 Item 31 • Table 4.1-2 Item 6.b Frequency
3.4B A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	Section 3.4 Bases (as applicable)	2.2, 3.1.1, 3.1.2, 3.1.3, 3.1.4, and 3.1.6, 3.5.1 Bases
3.4B A3	Revised the requirement for 2 out of 3 emergency powered pressurizer heater groups to be operable to equivalently specify that a minimum of 126 kW of heaters are required to be operable.	LCO 3.4.9.b	3.1.3.6

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4B A4	CTS contains a requirement associated with reactor coolant leakage that prevents a reactor restart until compliance is restored. This requirement is not specifically identified in the corresponding ITS specification; however, ITS LCO 3.0.4 provides the same restrictions.	LCO 3.4.13 and LCO 3.0.4	3.1.6.6
3.4B A5	Included an explicit STS Surveillance Requirement to verify steam generator tube integrity in accordance with the Steam Generator Tube Inspection Program.	SR 3.4.13.2	4.18
3.4B A6	The CTS Table that specifies Minimum Sampling and Analysis Frequency contains a note that was applicable only through the end of Cycle 2 operation. This note has been omitted from ITS. ** Not applicable after Cycle 2.	N/A**	Table 4.1-3, Note (11)
3.4B A7	Adopted explicit STS Mode Applicability for a Condition in which leakage from RCS Pressure Isolation Valves is not within limits. CTS contains no such applicability statement but CTS Required Actions and Completion Times for noncompliance are equivalent to STS requirements. Additionally, the allowance for separate Condition entry for each flow path is explicitly provided.	3.4.14 Applicability and Actions, Note 1	3.1.6.9
3.4B A8	An explicit as-left acceptance criterion is included in the surveillance for verification of Operability of pressurizer safety valves. CTS contains an equivalent criterion.	SR 3.4.10.1	2.2.2 Bases
3.4B A9	Adopted the safety analysis value for maximum pressurizer level in order to establish consistency with other parameters presented in ITS.	LCO 3.4.9	3.1.3.4
3.4B A10	Specifications and tables depicting instrumentation requirements are reformatted and replaced with the applicable ITS requirements. Technical changes are documented in the appropriate Discussion of Change (DOC) related to the applicable requirement.	Format change affects various ITS requirements.	3.5.1.1, 3.5.1.2

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4B A11	CTS specification that establishes a limit for unidentified reactor coolant leakage includes the phrase “exceeding normal evaporative losses”. This phrase has no practical application and is omitted.	3.4.13	3.1.6.2
3.4B A12	An explicit requirement is provided in ITS for Operability of the Electromatic Relief Valve (ERV) during LTOP operation. The Applicability for deactivation of High Pressure Injection has been changed from $<262^{\circ}\text{F}$ to $\leq 262^{\circ}\text{F}$. This change has negligible impact on the actual application of the specification and is considered administrative. Revised presentation of Applicability of pressurizer operability requirements during LTOP operation based on ITS Mode definitions.	LCO 3.4.11, 3.4.1 Applicability, and 1.1	Table 4.1-2, item 17, 3.1.2.10, and 3.1.2.11
3.4B A13	Adopted STS terminology for the expression of Surveillance Frequencies.	Terminology change affects various ITS Instrument Surveillance Requirements in 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15.	Table 4.1-1 Note

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5 A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Emergency Core Cooling Systems (ECCS).</p> <p>* Deleted by previous TS Amendment</p>	<ul style="list-style-type: none"> 3.5.4 Applicability 3.5 Title 3.5.2, 3.5.3, and 3.5.4 3.5.2 Applicability LCO 3.5.2 3.5.1 Applicability N/A* 3.5.1, 3.5.2, and 3.5.3 SRs SR 3.5.2.2 	<ul style="list-style-type: none"> 3.2 Applicability and Objective 3.3 Title 3.3 Applicability and Objective 3.3.2 3.3.2 (A) 3.3.3 Table 4.1-1, Item 42 4.5 Title, 4.5.1 Applicability and Objective 4.5.1.2
3.5 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> 3.5.4 Bases 3.5.1, 3.5.2, 3.5.3, and 3.5.4 Bases 3.5.1, 3.5.2, and 3.5.3 Bases 	<ul style="list-style-type: none"> 3.2 Bases 3.3 Bases 4.5 Bases
3.5 A3	Provides an explicit ACTION for a condition in which two Core Flood Tanks are inoperable.	3.5.1 ACTION C	3.3.6
3.5 A4	Removed the qualifier “and irradiated fuel is in the core”. This qualifier is deleted because the ITS definition of Mode is premised on “fuel in the reactor vessel”.	1.1 Definition of Modes, Table 1.1-1	3.3.2
3.5 A5	Adopted Note to clarify that an LPI train may be considered Operable during alignment and when aligned for decay heat removal, if capable of being manually realigned to the LPI mode of operation. This change is consistent with TSTF-090.	LCO 3.5.3 Note	3.3.6
3.5 A6	Separated CTS required actions for inoperability of the LPI system in Mode 3 with RCS temperature $\leq 350^{\circ}\text{F}$.	3.5.3 ACTIONS A and B	3.3.6

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5 A7	STS Specifications are adopted that delineate between requirements for ECCS during operation and ECCS requirements while shutdown. This change removes CTS actions, associated with ECCS during operating conditions, from the ITS Specification for ECCS during shutdown conditions.	3.5.3	3.3.6
3.5 A8	Located the Core Flood Tank (CFT) parameter values and discharge valve requirements in ITS Surveillance Requirements for verification of CFT operability. CTS contained these values in the LCO statement.	SR 3.5.1.1, SR 3.5.1.2, SR 3.5.1.3, SR 3.5.1.4, and SR 3.5.1.5	3.3.3(A)(B)(C)
3.5 A9	Located the Borated Water Storage Tank (BWST) required parameter values in ITS Surveillance Requirements for verification of BWST operability. CTS contained these values in the LCO statement.	SR 3.5.4.1, SR 3.5.4.2, and SR 3.5.4.3	3.3.1(G)
3.5 A10	Adopted STS Note pertaining to the Frequency for verification of Core Flood Tank (CFT) concentration. The purpose of the Note is to explicitly state the current plant practice that the requirement applies to the affected CFT following an inventory addition.	SR 3.5.1.4 Frequency Note	Table 4.1-3, Item 3
3.5 A11	Adopted an explicit ACTION requiring entry into LCO 3.0.3 for a condition in which one or more ECCS trains is inoperable and less than 100% of the ECCS flow equivalent to a single operable train is available. This is an administrative change in presentation because CTS do not explicitly address this condition, and thus would require entry into CTS 3.0.3.	3.5.2 ACTION C	3.3.6, 3.0.3
3.5 A12	Modified the Core Flood Tank required parameter values in order to present the safety analysis values in a consistent fashion.	SR 3.5.1.2 and SR 3.5.1.3	3.3.3
3.5 A13	Not used. (Page approved by CTS Amendment 205, effective March 31, 2000.)	N/A	N/A

Table A – Administrative Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 A1	<p>Incorporated wording preference, editorial, numbering, structure, and STS formatting convention changes to CTS requirements for Reactor Building Systems.</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • LCO 3.6.1, LCO 3.6.2, LCO 3.6.3, and SR 3.6.1.1 • 3.6.5 • 3.6.5 Applicability • 3.6.5 Required Actions D.1 and F.1, 3.6.6 Required Action B.1 • LCO 3.6.1, LCO 3.6.2, LCO 3.6.3, LCO 3.6.4, and 3.6.3 Action Note 4 • 3.6.1 Required Action B.2, 3.6.2 and 3.6.3 Required Action D.2 • 3.6.4 Required Action B.2 • 3.6.3 Required Action D.2 • 3.6.7 • 3.6.3 • N/A* 	<ul style="list-style-type: none"> • 1.7, 4.4.1 • 3.3, 4.5.2 • 3.3.4 • 3.3.6, 3.3.7(C), (D), (E) • 3.6 • 3.6.1 • 3.6.4 • 3.6.6 • 3.14, 3.14.1, 3.14.2, 4.12 • 3.23, 4.26 • 4.4.1.1.1, 4.4.1.1.2, 4.4.1.1.3, 4.4.1.1.5, 4.4.1.1.6, 4.4.1.1.7, 4.4.1.2.1, 4.4.1.2.2, 4.4.1.2.3, 4.4.1.2.4, 4.4.1.3, 4.4.1.5
3.6 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> • 3.6.5 and 3.6.6 Bases • 3.6.1, 3.6.2, 3.6.3, and 3.6.4 Bases • 3.6.7 Bases • 3.6.3 Bases • 3.6.5 Bases 	<ul style="list-style-type: none"> • 3.3 Bases • 3.6 and 4.4 Bases • 3.14 and 4.12 Bases • 3.23 and 4.26 Bases • 4.5.2 Bases
3.6 A3	Omitted CTS requirement for reactor building integrity when entering Mode 2 since it is redundant to the requirements of ITS LCO 3.0.4.	LCO 3.0.4	3.6.3
3.6 A4	Not used.	N/A	N/A

Table A – Administrative Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 A5	Adopted the STS Condition Notes implied in CTS 3.6.6 making associated actions applicable only to those penetrations with two isolation valves.	3.6.3 Condition A and B Notes	3.6.6
3.6 A6	Omitted the redundant CTS wording of "but both reactor building spray systems are operable" in favor of the STS wording which does not include this redundant information.	3.6.5 Conditions B and C	3.3.4(A), 3.6.7(C) and (D)
3.6 A7	The references to CTS 3.3.7 and to perform a reactor shutdown contained within CTS 3.3.6 is omitted since this step is enveloped within the CTS 3.3.6 ITS equivalent ACTIONS.	3.6.5 ACTION E	3.3.1, 3.3.6
3.6 A8	Adopted STS ACTIONS Note is implied, but not specifically stated in the CTS, requiring entry into ITS 3.6.1 if leakage limits associated with personnel airlocks are exceeded.	3.6.2 ACTIONS Note 3	3.6.1
3.6 A9	Adopted STS Condition Note which allows the actions associated with Condition A to not be completed if Condition C is entered for events involving both air locks of a single penetration being inoperable. ACTION C is more restrictive than ACTION A in that it does not allow continued operation until the next scheduled shutdown. This adoption remains consistent with CTS requirements 1.7.a and b, and 3.6.1.	3.6.2 Condition A Note 1	3.6.1, 1.7.a and b
3.6 A10	Not used.	N/A	N/A
3.6 A11	Not used	N/A	N/A
3.6 A12	Omitted CTS footnote related to testing sequence of reactor building coolers since the date conditions of the footnote have expired.	N/A	4.5.2.1.2(a)(1) Note 1
3.6 A13	Adopted the STS wording requiring a visual inspection of the hydrogen recombiners consistent with the CTS, but omitting the CTS word "within" the recombiner. The STS wording is more general and, therefore requires visual inspection of the entire unit.	SR 3.6.7.2	4.12.1.b.2

Table A – Administrative Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 A14	Adopted the CTS equivalent requirements of the STS associated with actions required during reactor building cooling or spray system inoperabilities.	3.6.5 ACTIONS A and B	3.3.4(A), 3.3.7(E)
3.6 A15	Not used.	N/A	N/A
3.6 A16	See Table L – 3.6.		
3.6 A17	Adopted STS requirement to time automatic valves during functional testing which is consistent with CTS testing performed under ASME Section XI requiring these valves to be timed.	SR 3.6.3.4	4.4.1.4
3.6 A18	Omitted configuration details of the CTS regarding the equipment hatch, personnel hatches, and non-automatic reactor building isolation valves in favor of the STS requirement for this equipment to be OPERABLE.	LCO 3.6.1, LCO 3.6.2, and LCO 3.6.3	1.7.a, 1.7.b, 1.7.c
3.6 A19	Adopted the STS equivalent of CTS non-automatic isolation valves which includes manual valves.	LCO 3.6.3	1.7.c
3.6 A20	Adopted the STS wording related to reactor building leakage testing of "in accordance with" the appropriate leak test program in lieu of the CTS reference to the specific SR number.	SR 3.6.1.1	1.7.e, 4.4.1
3.6 A21	Not used.	N/A	N/A
3.6 A22 open	Adopted the STS ACTIONS Note which allows reactor building isolations valves to be opened intermittently under administrative controls as implied by the CTS wording "closed as required."	3.6.3 ACTIONS Note 1	1.7.c
3.6 A23	Adopted the CTS provisions of 4.0.1 regarding the requirement to perform SRs only in the modes in which the equipment is required to be OPERABLE into the applicable ITS SRs.	SR 3.6.5.1 through SR 3.6.5.7	4.0.1, 4.0.1 Bases, 4.5.2.1 and 4.5.2.2

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Plant Systems.</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • 3.7.7 • LCO 3.7.7 • 3.7.7 ACTION B • 3.7.1 • 3.7.1, 3.7.2, and 3.7.3 Applicability • N/A* • 3.7.1, 3.7.2, and 3.7.3 ACTIONS • LCO 3.7.9, LCO 3.7.10, 3.7.9 Applicability, 3.7.10 Applicability • 3.7.9 and 3.7.10 Applicability • 3.7.10 Applicability • 3.7.9 Applicability • 3.7.4 Applicability and ACTION A • 3.7.8 Applicability • 3.7.11 Applicability • 3.7.11 ACTION A • 3.7.11 Required Action C.2 • 3.7.12 Applicability • SR 3.7.7.2 • 3.7.5 Applicability • SR 3.7.5.5 • 3.7.9 and 3.7.10 • N/A* 	<ul style="list-style-type: none"> • 3.3 Applicability • 3.3.1(C) • 3.3.6 • 3.4 Applicability • 3.4.1 • 3.4.1.4 • 3.4.2 • 3.8.18 • 3.9, 4.10 Applicability • 3.9.1.1 • 3.9.2.1 • 3.10 • 3.11, 4.13 Applicability • 3.13, 4.11 Applicability • 3.13.2 • 3.13.3 • 3.15, 4.17 Applicability • 4.5.1.1.2(a)(2) and 4.5.1.1.2(c)(2) • 4.8 Applicability • 4.8.1(c) • 4.10 Applicability • 6.12.5.a, c, f, g, h, and i

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> • 3.7.7 Bases • 3.7.1, 3.7.2, 3.7.3, and 3.7.6 Bases • 3.7.9, 3.7.10, 3.7.14, and 3.7.15 Bases • 3.7.9 and 3.7.10 Bases • 3.7.4 Bases • 3.7.8 Bases • 3.7.11 Bases • 3.7.12 Bases • 3.7.5 Bases 	<ul style="list-style-type: none"> • 3.3 and 4.5 Bases • 3.4 Bases • 3.8 Bases • 3.9 and 4.10 Bases • 3.10 Bases • 3.11 and 4.13 Bases • 3.13 and 4.11 Bases • 3.15 and 4.17 Bases • 4.8 Bases
3.7 A3	The CTS phrase "each EFW flowpath" is clarified consistent with the STS to include both the water and steam supply flow paths.	SR 3.7.5.1	4.8.1.b
3.7 A4	Incorporated ITS 3.7.7 Required Action A.1 Notes 1 and 2 to ensure the affected emergency diesel generator (EDG) and decay heat removal (DHR) systems are declared inoperable upon loss of a service water (SW) loop as is consistent with the CTS regarding cascading specifications.	3.7.7 Required Action A.1 Notes 1 and 2	N/A
3.7 A5	Adopted STS applicability for secondary system activity consistent with the implied applicability of CTS 3.10 and CTS Table 4.1-3, Item 5, Notes 7 and 10.	3.7.4 Applicability	Table 4.1-3 Note 10
3.7 A6	The ITS Condition to enter LCO 3.0.3 when both control room emergency ventilation systems (CREVS) or both control room emergency air condition systems (CREACS) are inoperable is included, consistent with the application of CTS 3.9.	3.7.9 Condition F, 3.7.10 ACTION E	N/A
3.7 A7	Not used	N/A	N/A
3.7 A8	The essentially equivalent value for spent fuel pool (SFP) boron concentration of ≥ 1600 ppm in the STS is adopted in lieu of the CTS requirement of "at greater than 1600 ppm."	LCO 3.7.14	3.8.17
3.7 A9	Not used.	N/A	N/A

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 A10	Duplicate requirements of 10 CFR 30, 40 and 70 are omitted regarding the on-site inventory of licensed radioactive material.	N/A	3.12.3
3.7 A11	Not used	N/A	N/A
3.7 A12	Not used	N/A	N/A
3.7 A13	Not used	N/A	N/A
3.7 A14 open	The CTS page as shown is not yet approved, but illustrates the page format supporting the license amendment request submitted to the NRC on January 27, 2000, related to the Q-CST required volume.	3.7.1, 3.7.2, 3.7.3, 3.7.5, 3.7.6	3.4 (CTS page 40)
3.7 A15	The cooling water requirements of CTS 3.3.1.E for support of the low pressure injection (LPI) coolers is incorporated into the SW ITS 3.7.7 instead of ITS 3.5.2 or 3.5.3 LPI specifications.	LCO 3.7.7	3.3.1.E
3.7 A16	The CTS CREVS requirements have been revised to require automatic actuation of only one train, an allowance that was unintentionally deleted when the CREVS specifications were revised in a license amendment request approved by the NRC on May 19, 1999. Correspondence associated with the aforementioned revision clearly illustrates the understanding that only one CREVS train is required to have automatic actuation capability even though this clarification was inadvertently removed from the TS.	LCO 3.7.9 Note 2	3.9.2

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8 A1	<p>Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS section 3.8, Electrical Power Systems.</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • 3.8.1 Required Actions F.1 and F.2 • All 3.8 specifications • 3.8.1 and 3.8.9 Applicability and Required Actions • 3.8.1 Required Actions F.1 and F.2 • 3.8.4 and 3.8.6 Applicability • 3.8.4 Required Actions B.1 and B.2 • 3.8.6 Required Actions A.1, A.2, and A.3 • N/A* • All 3.8 SRs • Table 3.8.6-1 • 3.8.1, 3.8.4, and 3.8.6 Bases 	<ul style="list-style-type: none"> • 3.0.5 Items 2 and 3 • 3.7 • 3.7.2.A • 3.7.2.H(2) • 3.7.3 • 3.7.3.B • 3.7.4.A • Table 4.1-1 Item 31 • 4.6 • Table 4.6-1 • 4.6 Bases
3.8 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	<ul style="list-style-type: none"> • 3.0 Bases • 3.8.1, 3.8.3, 3.8.4, 3.8.6, and 3.8.9 Bases • 3.8.1, 3.8.4, and 3.8.6 Bases 	<ul style="list-style-type: none"> • 3.0.1 through 3.0.5 Bases • 3.7.3 Bases • 4.6 Bases
3.8 A3	Incorporated requirement to declare associated features inoperable or perform required actions consistent with the CTS of CTS 3.0.5 into individual Mode 5 and 6 Electrical Power System specifications in the ITS.	3.8.2, 3.8.5, 3.8.8, 3.8.10	3.0.5
3.8 A4	Omitted out-of-date information regarding a one-time extension of the 18-month EDG inspection for the ninth refueling outage at ANO-1 that no longer represents a requirement and that has no impact on the safety analysis or any equipment used to mitigate design basis events.	N/A	4.6.1.3
3.8 A5	Not used	N/A	N/A
3.8 A6	Not Used.	N/A	N/A
3.8 A7	Not used	N/A	N/A
3.8 A8	Not used	N/A	N/A

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8 A9	Incorporated emergency diesel generator full load criteria of 2475 to 2750 KW in accordance with Regulatory Guide 1.9, Section C.2.2 recommendations.	SR 3.8.1.3	4.6.1.1
3.8 A10	Not used	N/A	N/A
3.8 A11	Not used	N/A	N/A
3.8 A12	Incorporated ITS Applicability of Modes 1, 2, 3, and 4 for Auxiliary Electrical System specifications which corresponds to the CTS applicability of > 200°F.	3.8.1, 3.8.3, and 3.8.9 Applicability	3.7.1

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9 A1	Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS section 3.9, Refueling Operations.	<ul style="list-style-type: none"> • 3.9.1, 3.9.2, 3.9.3, 3.9.4, 3.9.5, 3.9.6 • 3.9.2 Applicability • 3.9.4 Required Action A.3, 3.9.5 Required Actions A.1 and B.2 	<ul style="list-style-type: none"> • 3.8 • 3.8.2 • 3.8.3.b
3.9 A2	Incorporated STS Bases into the ITS Bases and deleted CTS Bases, with the exception of applicable technical content which is retained in the ITS Bases.	3.9.1, 3.9.2, 3.9.3, 3.9.4, 3.9.5, and 3.9.6 Bases	3.8 Bases
3.9 A3	Adopted STS requirement implied in the CTS to take corrective action immediately to suspend fuel movement and reductions in reactor coolant boron concentration, and to return the affected supporting equipment to an operable status.	3.9.1 Condition A, 3.9.2 Condition A and Required Action B.1, 3.9.3 Condition A	3.8.9
3.9 A4	Adopted STS wording as modified by TSTF 286, Revision 2 regarding the applicability regarding the removal of forced reactor coolant circulation for limited periods when in Mode 6 with at least 23 feet of water above the fuel seated in the reactor vessel. The CTS applied this specification during core alterations for which it also requires at least 23 feet of water above the fuel seated in the reactor vessel. The ITS meets the intent of the CTS and existing plant practice.	LCO 3.9.4 Note and 3.9.4 Applicability	3.8.3.a Note *
3.9 A5	Omitted the CTS exception to the provisions of LCO 3.0.3 since the STS modes of applicability and conditions for ITS Section 3.9 envelop the necessary plant conditions for operability and do not contain requirements in Modes 1, 2, 3, and 4 for which LCO 3.0.3 applies. The CTS exception is unnecessary.	N/A	3.8.9, 3.8.10
3.9 A6	Adopted ITS 3.9.4 Applicability implied by CTS 3.8.3.a to ensure adequate decay heat removal during plant operation in Mode 6 with at least 23 feet of water above the fuel seated in the reactor vessel.	3.9.4 Applicability	3.8.3.a

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9 A7	Adopted STS option to place the unit in a non-applicable mode by increasing reactor coolant level to at least 23 feet above the fuel seated in the reactor vessel in lieu of the explicit CTS and STS requirement to restore the inoperable decay heat removal loop to operable status. This change is administrative because placing the unit in a non-applicable mode is always an option in the CTS, STS, and ITS.	3.9.5 Required Action A.2	N/A
3.9 A8	Adopted the STS term of "immediately" implied in the CTS to establish corrective actions of suspending fuel movement and reductions in boron concentration as revised by TSTF 286, Revision 2.	3.9.4 Required Actions A.1 and A.2, 3.9.5 Required Action B.1	3.8.3.a
3.9 A9	Adopted STS Applicability Note as revised by TSTF 272, Rev. 1 to state that refueling canal boron is only of concern when the refueling canal is connected to the reactor coolant as implied by the CTS by placing boron requirements on the refueling canal during the movement of fuel.	3.9.1 Applicability Note	3.8.4
3.9 A10	Not used.	N/A	N/A

Table A – Administrative Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention to CTS requirements for Design Features.	<ul style="list-style-type: none"> • 4.0 (general) • 4.2.1 • 4.2.2 • 4.0 (general) • Figure 4.3.1.2-1 	<ul style="list-style-type: none"> • 5.0, 5.1, 5.4 • 3.8.2 • 5.3.1.4 • 5.3 and 5.4 References, 5.4.1, 5.4.2 • Figure 5.4-1
4.0 A2	Not Used	N/A	N/A
4.0 A3	Adopted the essentially equivalent STS requirement of "less than or equal to" in lieu of the CTS "less than" requirement associated with the shutdown margin requirements for new fuel storage.	4.3.1.2	5.4.1.1
4.0 A4	Omitted the CTS reference to the applicability of LCO 3.0.3 regarding storage of fuel assemblies in the spent fuel pool since this information is relocated to Design Features section of ITS and is no longer a limiting condition for operation for which LCO 3.0.3 can be applied.	N/A	3.8.15, 3.8.16

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A1	<p>Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Administrative Controls.</p> <p>* The ITS Requirement column indicates there is no ITS requirement corresponding to the listed CTS requirement because the CTS requirement has been deleted by previous amendment.</p>	<ul style="list-style-type: none"> • 5.5.10 • 5.5.8 • 2.0 • 5.5.9 • Table 5.5.9-1 • Table 5.5.9-2 • Figure 5.5.9-1 • 3.6.3 • 5.1.2 • N/A* • 5.2.2 • 5.4.1.a • 5.4.1.c • 5.4.1.d • 5.5.16 • 5.4 • 5.7 • 5.5.1 	<ul style="list-style-type: none"> • Operating License Item (7) • 4.0.5.d • 4.2 • 4.18 • Table 4.18-1 • Table 4.18-2 • Figure 4.18.1 • 4.26 • 6.1.2 • 6.4, 6.5, 6.6, 6.8.1.d, 6.8.1.e, 6.8.2, 6.8.3, 6.9, 6.5.12.a, 6.5.12.c, 6.5.12.f, 6.5.12.g, 6.5.12.h, 6.5.12.i, and 6.13 • Table 6.2.1 • 6.8.1.b, 6.8.1.c • 6.8.1.g • 6.8.1.h • 6.8.4 • 6.8.5.g, 6.8.5.j • 6.11.1 • 6.14

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A2	Three existing license conditions are moved to equivalent programmatic requirements in ITS Section 5.5, Programs and Manuals. The requirements of these License Conditions for Systems Integrity, Iodine Monitoring, and Secondary Water Chemistry will be retained in ITS Section 5.5. These ITS programmatic administrative controls specifications are consistent with the STS and current plant practice and meet the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative.	<ul style="list-style-type: none"> • 5.5.2 • 5.5.3 • 5.5.10 	<ul style="list-style-type: none"> • Operating License (OL) 2.C.(5) • OL 2.C.(6) • OL 2.C.(7)
5.0 A3	Added a statement regarding the applicability of SR 3.0.2 and SR 3.0.3 to provide clarification in the ITS comparable to the applicability of CTS 4.0.2 and 4.0.3 to these specifications.	<ul style="list-style-type: none"> • 5.5.8 • 5.5.12 • 5.5.7 • 5.5.13 • 5.5.11 	<ul style="list-style-type: none"> • 4.0.5.e • 3.24, 3.25.1, and 3.25.2 • 4.2.6 • 4.6.1.4.e • 3.13, 3.15, and 4.10
5.0 A4	Omitted CTS reference to a Special Report associated with Category C3 Steam Generator (SG) tube inspection sample results since this information is provided under the ITS steam generator inspection report.	5.6.7	Table 4.18-2

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A5	Omitted CTS requirements that are duplicate or redundant to the noted regulations. Where inferred by 10 CFR 55.4, reference to the appropriate regulation is included in the ITS. This change is administrative because it does not alter any operational, inspection, or administrative requirements for ANO-1.	<p>Following are regulations referenced by corresponding CTS requirements.</p> <ul style="list-style-type: none"> • 10 CFR 50.55a(f) and 50.55a(g) • 10 CFR 50.55a(g) • 10 CFR 50.54(m)(2)(iii) and (iv) • 10 CFR 50.54(m)(2)(i) • 10 CFR 20 • 10 CFR 50.4 	<p>These CTS requirements are redundant and are omitted in ITS.</p> <ul style="list-style-type: none"> • 4.0.5 • 4.2.2, 4.2.3, 4.3.1, 4.3.3, 4.27.2 • Table 6.2-1 Note *, Additional Requirements 1, 2, and 4 • 6.2.2, Table 6.2-1 • 6.10 • 6.12.1, 6.12.3.4, 6.12.5
5.0 A6	The reactor coolant system CTS ultrasonic test is omitted since ANO-1 pre-operational requirements have been previously met.	N/A	4.2.1
5.0 A7	Added the STS definitions for 9 months and biennially for clarification purposes in the inservice test program specification.	5.5.8	4.0.5.b
5.0 A8	Presentation and format of ventilation filter testing requirements is revised for consistency and all frequencies and methods are omitted since they are redundantly specified in Regulatory Guide 1.52, Revision 2. See DOC 5.0 – M10.	5.5.11	4.10.2
5.0 A9	Not used.	N/A	N/A
5.0 A10	Not used.	N/A	N/A
5.0 A11	The "≤" signs for CTS containment leakrate limits are revised to be "<" signs to be consistent with 10 CFR 50, Appendix J.	5.5.16	6.8.4
5.0 A12	Added a statement regarding the applicability of SR 3.0.2 and SR 3.0.3 to provide clarification in the ITS that these requirements are applicable to the steam generator inspection requirements of ITS Section 5.0. This clarification was not required in the CTS since the SG specifications were located with the surveillance requirements section.	5.5.9	4.18

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A13	The CTS is revised to reflect the correct 10 CFR 20 terminology for the units of occupational exposure, add a statement limiting the report scope to those persons monitored, and to refer to the pocket ionization chamber for dosimetry purposes with a reference to the electronic dosimeter as an additional means of collecting exposure data.	5.6.1	6.12.2.2
5.0 A14	The CTS is revised to clarify the reporting requirements for the Radioactive Effluent Release Report. This change is administrative because it only clarifies the content and annual submission date of the report, consistent with the intent of the CTS and 10 CFR 20.	5.6.3 plus Note	6.12.2.6 plus Note **
5.0 A15	Not used.	N/A	N/A
5.0 A16	The second paragraph of CTS 4.18.5.b, which is associated with steam generators, was applicable for Cycle 16 only and was deleted by Amendment 213 that was approved on March 28, 2001.	N/A	4.18.5.b
5.0 A17	The CTS is revised to reflect the latest changes in 10 CFR 20 regarding the overall level of effluent control while maintaining the operational flexibility provided in the CTS. Additionally, a statement is added consistent with the intent of performing surveillances regarding the applicability of SR 3.0.2 and SR 3.0.3 to provide clarification.	5.5.4	6.8.5

Table M – More Restrictive Changes
ITS Section 1.0 – Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 none	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 M1	Established applicabilities consistent with STS. Reactor Core Safety Limits will be applicable when K_{eff} is ≥ 0.99 instead of CTS applicability of ≥ 1.0 .	2.1.1 Reactor Core Safety Limits	2.1.1, 2.1.2, 2.1.3
2.0 M2	Incorporated STS required actions when the RCS Pressure Safety Limit is violated in Modes 3, 4, and 5. The CTS did not establish required actions for these modes of operation.	2.2 Safety Limit Violations	6.7
2.0 M3	Established requirement to place unit in Mode 3 upon a Safety Limit violation. This requires the reactor to be shutdown to a K_{eff} of < 0.99 versus the CTS requirement to shutdown to $K_{eff} < 1.0$.	2.2.1, 2.2.2, 2.2.3 Safety Limit Violations	6.7.1.a

Table M – More Restrictive Changes
ITS Section 3.0 – Limiting Condition for Operations (LCO) Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 M1	Adopted STS SR 3.0.3 into the ITS which incorporates CTS 3.0.3 and 4.0.3	SR 3.0.3	3.0.3, 4.0.3
3.0 M2	Adopted STS LCO 3.0.3 which reduces the times allowed to place the unit in Modes 3 and 4.	LCO 3.0.3	3.0.3

Table M – More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 M1	Adoption of STS specification and evaluation frequency to verify that measured core reactivity balance corresponds to predicted values.	SR 3.1.2.1	4.9 Specification
3.1 M2	Adoption of STS LCO actions and specified Completion Time for condition when measured core reactivity balance is not within the limit.	LCO 3.1.2, 3.1.2 Required Action A.1	4.9 Specification
3.1 M3	Not used.	N/A	N/A
3.1 M4	Adopts more restrictive applicability of Modes 1 and 2 for Moderator Temperature Coefficient (MTC) limits than CTS applicability of when “the reactor is not shutdown”.	3.1.3 Applicability	3.1.7.1
3.1 M5	Adopted the STS more restrictive applicability for control rod limits by applying the requirements to Modes 1 and 2 in lieu of the CTS applicability of during power operation.	3.1.4 Applicability, 3.1.5 Applicability, 3.1.6 Applicability	3.5.2 Applicability
3.1 M6	The requirements of STS LCO 3.1.1 “Shutdown Margin (SDM)” are adopted as presented in ITS. More restrictive specific LCO requirements, required actions, and surveillance requirements are established which are not explicitly required in the CTS.	3.1.1	3.1.3.3
3.1 M7	Adopted more restrictive STS required actions and Completion Times when more than one control rod is inoperable or misaligned	3.1.4 Required Action C.2 and 3.1.5 Required Action B.2	3.5.2.2.1
3.1 M8	Adopted STS test frequency for control rod drop time testing. This change in test frequency imposes the requirement of performing control rod drop time testing following any removal of the reactor vessel head and prior to reactor criticality. CTS requires rod drop testing following each refueling shutdown prior to return to power.	SR 3.1.4.3	Table 4.1-2, Item 1, 4.7.1.1
3.1 M9	Adopted STS Completion Time of 2 hours for condition with one control rod inoperable or misaligned where the CTS did not specify a Completion Time.	3.1.4 Completion Time A.2.2.1	3.5.2.2.5
3.1 M10	Adopted the second Completion Time of STS 3.1.4 Required Action A.2.2.1 which addresses the condition of one control rod inoperable or misaligned. This change imposes an additional Completion Time that requires verification of Shutdown Margin once per 12 hours following the initial verification not found in the CTS.	3.1.4 Required Action A.1.1 second Completion Time	N/A
3.1 M11	Adopted requirements not found in the CTS to verify that control rods and APSRs are within 6.5% of their group average and that safety rods are fully withdrawn on a 12 hour frequency.	SR 3.1.4.1, SR 3.1.5.1, SR 3.1.6.1	N/A

Table M – More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 M12	CTS requires the unit to be placed in “at least HOT STANDBY” (reactor critical below 2% power) if the Moderator Temperature Coefficient (MTC) is outside its limits. This change adopts STS 3.1.3 Action A which requires the unit to be placed in MODE 3 (reactor subcritical) if MTC is outside its limits.	3.1.3 Required Action A.1	3.1.7.3
3.1 M13	Adopted STS Applicability for operability requirements of control rod position indicator channels. No explicit Applicability exists for the equivalent requirements contained in CTS.	3.1.7 Applicability	4.7.1.3
3.1 M14	Adopted STS Physics Tests Exceptions – Mode 1 and Mode 2. CTS excepted certain individual specifications with a statement such as “except for physics testing”. No differentiation was made in the CTS of the applicability of these exceptions with respect to the unit’s thermal power level. Additionally, only a minimal number of specific requirements were presented in the CTS during Physics Tests and no required actions were presented.	3.1.8, 3.1.9	None
3.1 M15	Adopted STS 3.1.2 Required Action A.2 and B.1, and the frequency of SR 3.1.2.1 along with the modifying notes that are not found in the CTS, providing guidance for continued operation with a reactivity anomaly that exceeds its limit and action to place the unit in Mode 3 should the Required Actions and Completion Times not be met.	3.1.2 Required Action A.2, 3.1.2 Required Action B.1, SR 3.1.2 Frequency and Notes	None
3.1 M16	Adopted 72 hour Completion Time of STS 3.1.4 Required Action A.2.4 where none existed in the CTS to verify the potential ejected rod worth is within assumptions of the rod ejection analysis.	3.1.4 Required Action A.2.2.2 Completion Time	3.5.2.3
3.1 M17	Deleted the “no flow” rod drop time testing acceptance criteria contained in CTS. The deletion of this allowance results in the ITS possessing more restrictive requirements than those established in CTS by restricting available test methods.	SR 3.1.4.3	4.7.1.1
3.1 M18	Not used	N/A	N/A
3.1 M19	Adopted STS Required Action A.2.5, including associated note and Completion Time which requires verification of acceptable core linear heat rates during operation at less than or equal to 60% of the allowable thermal power with a misaligned control rod.	3.1.4 Required Action A.2.2.3 with Note	None

Table M – More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 M20	Deleted CTS provision that allows boration to be secured once the worth of the inoperable rod has been met or once the regulating rod groups are withdrawn above the Shutdown Margin (SDM) insertion limit given in the COLR. ITS requires that SDM be calculated and verified to be within the limit specified in the COLR when a control rod (s) is inoperable or misaligned.	3.1.4 Required Actions A.1.1, A.1.2, C.1.1, C.1.2	3.5.2.2.2
3.1 M21	Adopted STS Required Action to place the unit in Mode 3 (less than that required in the CTS) if adequate Shutdown Margin (SDM) is not verified within one hour or if boration is not initiated to obtain SDM within one hour.	3.1.4 Required Action B.1	3.5.2.2.3
3.1 M22	Adopted STS Completion Time that is not specified in the CTS to place the unit in Mode 3 within 6 hours if adequate Shutdown Margin (SDM) is not verified within one hour or if boration is not initiated to obtain SDM within one hour.	Completion Time for 3.1.4 Required Action B.1	3.5.2.2.3
3.1 M23	Adopted STS Completion Time not specified in the CTS to restore Control Rod alignment within 2 hours of entry into the Condition of one Control Rod inoperable or misaligned.	Completion Time for 3.1.4 Required Action A.2.1	3.5.2.2.6
3.1 M24	Adopted STS Completion Time not specified in the CTS of 2 hours for the Condition with one APSR inoperable or misaligned.	Completion Time for 3.1.6 Required Action A.1	3.5.2.2.6
3.1 M25	Adopted a 2 hour Completion Time not specified in the CTS to reduce power below 60% allowed thermal power when a misaligned or inoperable control rod cannot be restored within limits.	Completion Time for 3.1.4 Required Action A.2.2.1	3.5.2.2.6
3.1 M26	Adopted STS Required Action not found in the CTS to place the unit in Mode 3 within 6 hours in the event the Required Actions and associated Completion Times of ITS 3.1.6 Condition A (one APSR inoperable or misaligned) are not met.	3.1.6 Condition B.	3.5.2.2.6
3.1 M27	Established a Required Action and Completion Time not found in the CTS to perform SR 3.2.5.1 to assure that power peaking factors are within the appropriate limits with a misaligned or inoperable APSR. This change incorporates TSTF-220, as modified by generic change ANO-1-063.	Required Action and Completion Time for 3.1.6 Condition A	3.5.2.2.6

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 M1	Adopted STS Required Action A.2 limiting the time that the unit can operate with Quadrant Power Tilt (QPT) greater than or equal to its steady state limit. Adopted STS Condition to reduce Thermal power to < 60% and reduce the overpower trip setpoint to $\leq 65.5\%$ if the Required Action and Completion Time of Condition A (QPT greater than specified limits) are not met. Adopted STS Condition directing a reduction in Thermal Power to $\leq 20\%$ with a Completion Time of 4 hours if the Required Action and Completion Time are not met to reduce Thermal Power to < 60% and reduce the overpower trip setpoint to $\leq 65.5\%$	3.2.4 Required Action A.2, 3.2.4 Condition B, 3.2.4 Condition C.	3.5.2.4.2, 3.5.2.4.4
3.2 M2	Adopted STS Condition 3.2.2.B requiring shutdown of the unit by establishing Mode 3 within 6 hours if the Required Actions and Completion Times are not met following a Condition where APSRs are not within limits.	3.2.2 Condition B	3.5.2.5.4
3.2 M3	CTS defines Applicability for control rod group and power distribution limits as “during power operations” (although in practice, these limits are also applied during hot standby conditions). This change adopts STS Applicability of Modes 1 and 2 for Regulating Rod Insertion Limits and APSR Insertion Limits.	3.2.1 Applicability, 3.2.2 Applicability	3.5.2
3.2 M4	Adopted STS Required Actions and Completion Times for situations in which the regulating rod groups are inserted into the unacceptable operation region. The Completion Time for restoring regulating rod groups to within limits or reducing Thermal Power will be 2 hours. This is more restrictive than the present 4-hour restoration requirement of CTS.	3.2.1 Required Actions D.2.1 and D.2.2	3.5.2.5.3
3.2 M5	Adopted STS Surveillance Requirements for verifying that regulating rod groups are within the required sequence and overlap limits, insertion limits, and that the APSRs are within acceptable position limits. No comparable CTS Surveillance Requirements exist.	SR 3.2.1.1, SR 3.2.1.2, SR 3.2.2.1	3.5.2.5

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 M6	Adopted STS Condition which will require that Thermal Power be reduced to $\leq 20\%$ within 4 hours when Quadrant Power Tilt (QPT) is in excess of the maximum limit specified in the COLR. CTS allowed continued operation above Hot Shutdown with QPT in excess of the maximum limit, for physics and diagnostic testing. Under this allowance, the unit could have operated at levels up to 60%. Thus, adoption of the STS requirement is more restrictive. Additionally, the adoption of the 4-hour Completion Time will be more restrictive because the CTS did not establish a Completion Time for the required power reduction.	3.2.4 Condition D	3.5.2.4.3
3.2 M7	Adopted STS Required Action to place the unit in Mode 3 within 6 hours for the Condition in which regulating rod group position or sequence requirements are not met and specified Required Actions for the Condition are not accomplished within the Completion Times. CTS would require the unit to be in hot shutdown within 7 hours.	3.2.1 Required Action E.1	3.5.2.5.3
3.2 M8	Adopted STS Required Action to reduce Thermal Power to $\leq 40\%$ within 4 hours for a Condition in which Axial Power Imbalance is not within limits and the specified Required Actions for the Condition are not accomplished within the Completion Times. CTS does not establish a Completion Time for this required power reduction.	3.2.3 Required Action B.1	3.5.2.6.4
3.2 M9	Established Required Actions and Completion Times should the linear heat rate (LHR) not be within its limits. CTS contains a surveillance to verify LHR is within limits, however CTS does not contain corresponding Required Actions and Completion Times.	3.2.5 Required Action A 3.2.5 Required Action B	4.1.d
3.2 M10	Adopted STS Required Action to provide verification of acceptable core power, distribution, specifically local core Linear Heat Rates (local power peaking), during conditions where the regulating rod group is inserted into the restricted operation region. No similar requirements exist in the CTS.	3.2.1 Required Action A.1 with Note	3.5.2.5
3.2 M11	Adopted STS Required Action to provide verification of acceptable core power distribution, specifically local core Linear Heat Rates (local power peaking), during conditions where the axial power shaping rod (APSR) group is not positioned within the limits of the COLR.	3.2.2 Required Action A.1 with Note	3.5.2.5.4
3.2 M12	Adopted STS Required Action to provide verification of acceptable core power distribution, specifically local core Linear Heat Rates (local power peaking), during conditions where Axial Power Imbalance is not within the limits of the COLR.	3.2.3 Required Action A.1	3.5.2.6

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 M13	Adopted STS Completion Time for power reduction for a condition in which Quadrant Power Tilt exceeds its limit. CTS establishes a 4-hour completion time for the power reduction. Adoption of the STS Completion Time will require that the power reduction be accomplished within 2 hours of entry into the Condition or 2 hours after the last verification that Linear Heat Rate is within limits.	3.2.4 Required Action A.1.2.1 Completion Time	3.5.2.4.2
3.2 M14	Adopted STS Required Action to provide verification of acceptable local core Linear Heat Rates (local power peaking) during conditions where Quadrant Power Tilt is not within the steady state limits of the COLR. Performance of this Required Action will allow unrestricted unit operation for up to 24 hours as long as the linear heat rate criteria are met. No similar requirements exist in CTS.	3.2.4 Required Action A.1.1	3.5.2.4
3.2 M15	Adopted STS Completion Time that limits the time that the unit may operate with a Quadrant Power Tilt (QPT) coincident with a potential excessive core linear heat rate or excessive power peaking.	3.2.4 Required Action A.1.2.1 Completion Time	3.5.2.4.2
3.2 M16	Adopted a second Frequency for performance of the verification that Quadrant Power Tilt (QPT) is within limits as specified in the COLR. This second Frequency adopts the requirement to complete the SR at one hour intervals for 12 consecutive hours, or until verified acceptable at greater than 95% Reactor Thermal Power, following the restoration of QPT within limits.	SR 3.2.4.1 Frequency	3.5.2.4
3.2 M17	Adopted STS Frequency and Completion Times for Surveillance Requirement verifying Linear Heat Rate (LHR) is within limits. This is more restrictive because it requires repetitive performance of LHR verification while operating in accordance with the Required Actions of the associated LCOs. Further, if the LHR verification is not performed within the Completion Times, than a reduction in Thermal Power is required within a shorter Completion Time than required by CTS.	SR 3.2.5.1 Frequency and Completion Times	4.1.d

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2 M18	Adopted STS requirement that the Incore Detector System be operable anytime it is providing the required monitoring functions for Axial Power Imbalance, Quadrant Power Tilt (QPT), and Power Peaking. This extends the Applicability for Incore Detector System Operability down to $\leq 20\%$ power. Therefore ITS will impose requirements for Incore Detector System Operability that are more restrictive than those contained in CTS.	3.2.3, 3.2.4, 3.2.5	3.5.4
3.2 M19	Adopted STS Surveillance Requirement (SR) for verification that Shutdown Margin (SDM) is $\geq 1\% \Delta k/k$ within 4 hours prior to achieving criticality. CTS has no similar SR requirement.	SR 3.2.1.3	3.5.2

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A M1	Adopted STS 3.3.2 Applicability and Required Actions. Manual trip operability will be applicable in Modes 1, 2, 3, 4, and 5 when any CRD trip breaker closed and the CRD System capable of rod withdrawal instead of the CTS Applicability of above the CTS condition of Hot Shutdown. The adopted actions provide more restrictive requirements for Completion Times and for exiting the Modes of Applicability.	3.3.2 Applicability, and Conditions A and C	Table 3.5.1-1 Functional Unit 1
3.3A M2	The Channel Check frequencies for the turbine trip and loss of main feedwater trip functions were changed from monthly to every 12 hours and the Channel Functional Test frequencies were changed from within 31 days prior to criticality to every 31 days to be consistent with STS.	SR 3.3.1.1 and 3.3.1.4	Table 4.1-1 Items 35 and 41
3.3A M3	Adopted STS 3.3.1 Required Actions D.1 and D.2, and 3.3.2 Required Actions B.1 and B.2. These ACTIONS require the unit to be shut down to Mode 3 and all CRD trip breakers to be opened within 6 hours in lieu of the CTS requirement to be in the CTS condition of Hot Shutdown in 12 hours.	3.3.1 Required Actions D.1 and D.2, and 3.3.2 Required Actions B.1 and B.2	Table 3.5.1-1 Note 1
3.3A M4	Revised Frequency of power range instrument heat balance calibration from twice weekly to 96 hours under steady state conditions in ITS SR 3.3.1.2.	SR 3.3.1.2, Table 3.3.1-1 Function 1.a	Table 4.1-1 Item 3 Remark (1)
3.3A M5	STS 3.3.4 Actions C and D are adopted resulting in more restrictive Completion Times (1 hour versus 49 hours) and additional Required Actions to be taken upon electronic trip assembly (ETA) relay inoperability.	3.3.4 Required Actions C.1, C.2, C.3, C.4, and D.2.2	Table 3.5.1-1 Functional Unit 13, and Note 23
3.3A M6	Adopted more restrictive Completion Time (48 hours) of STS 3.3.4 ACTION A in place of restoration period provided in CTS (49 hours) for inoperable CRD trip breakers.	3.3.4 Required Actions A.1 and A.2 Completion Time	Table 3.5.1-1 Functional Units 14.A and 14.B, and Note 25
3.3A M7	Adopted additional action requirement of STS 3.3.9 Required Action B.1 to initiate repairs of inoperable source range instruments within 1 hour.	3.3.9 Required Action B.1	Table 3.5.1-1 Functional Unit 4, and Note 3

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A M8	Adopted additional requirements of STS 3.3.9 Required Actions A.1, A.2, A.3, and A.4, and 3.3.10 Required Actions A.1 and A.2 to ensure the plant is placed in an acceptable condition when source and/or intermediate range instruments, respectively, are inoperable.	3.3.9 Required Actions A.1, A.2, A.3, and A.4, 3.3.10 Required Actions A.1 and A.2	Table 3.5.1-1 Functional Units 3 and 4
3.3A M9	Adopted Channel Calibration frequency of STS SR 3.3.9.2 and 3.3.10.2 for source and intermediate range instruments where no such requirement existed in the CTS.	SR 3.3.9.2 and 3.3.10.3	Table 4.1-1 Items 5 and 6
3.3A M10 open	Adopted STS action requirement to open CRD trip breakers in 1 hour in the event the no required source range or intermediate range channel is inoperable. Opening the CRD trip breakers is more restrictive than the CTS requirement to place the unit in the CTS condition of Hot Shutdown when the one required source or intermediate range instrument is inoperable.	3.3.9 Required Action A.3 and 3.3.10 Required Action A.2	Table 3.5.1-1 Functional Units 3 and 4, and Note 1
3.3A M11	Requirements for Nuclear Overpower Low Setpoint function and the Shutdown Bypass RCS High Pressure function of STS 3.3.1 Required Action E and Table 3.3.1-1 Functions 1b and 11 are adopted, where no such requirements existed in the CTS.	3.3.1 ACTION E, Table 3.3.1-1 Functions 1b and 11	N/A
3.3A M12	Adopted the "Applicable MODES or Other Specified Conditions" column of STS Table 3.3.1-1 providing clear guidance on when related equipment must be operable which did not exist in the CTS.	Table 3.3.1-1 Column "Applicable MODES or Other Specified Conditions"	N/A
3.3A M13	A 1-hour Completion Time for CTS 3.5.1.3 which does not currently exist is adopted in the ITS in accordance with STS 3.3.1, Completion Times for ACTIONS A and B.	3.3.1 ACTIONS A and B Completion Times	3.5.1.3
3.3A M14	Adopted LCO, Applicability, and Required Actions requirements for reactor trip modules in accordance with STS where no such requirements exist in the CTS.	LCO 3.3.3, 3.3.3 Applicability, and Required Actions	N/A

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3A M15	Adopted STS 3.3.4 Applicability and ACTIONS D and E for Control Rod Drive (CRD) devices where none existed in the CTS.	3.3.4 Applicability, and ACTIONS D and E	N/A
3.3A M16	Adopted STS 3.3.9 Applicability and appropriate ACTIONS for source range instruments where no specific statement of applicability existed in the CTS.	3.3.9 Applicability and ACTION A	Table 3.5.1-1 Functional Unit 4, and Notes 1, 2, and 3
3.3A M17	Adopted STS 3.3.10 Applicability and appropriate ACTIONS for intermediate range instruments where no specific statement of applicability existed in the CTS.	3.3.10 Applicability and ACTION A	Table 3.5.1-1 Functional Unit 3, and Notes 1 and 2
3.3A M18	Adopted STS 3.3.1 ACTION C which requires entry into Mode 3 in 6 hours during certain conditions (with 3 or more inoperable RPS channels or ACTIONS A or B not met) for certain RPS Functions (as listed in Table 3.3.1-1) versus the 13 hours provided in the CTS.	3.3.1 ACTION C	N/A
3.3A M19	Allowable values which were not specified in the CTS for the Turbine Trip and the Loss of Main Feedwater Trip functions have been added.	Table 3.3.1-1 Functions 9 and 10	Table 3.5.1-1 Functional Units 11 and 12

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
B. Engineered Safeguards Actuation System (ESAS), ITS 3.3.5, 3.3.6, and 3.3.7

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3B M1	Not Used.	N/A	N/A
3.3B M2	Adopted 1 hour Completion Time to declare associated components inoperable where no Completion Time is specified in the CTS for one or more inoperable ESAS Actuation Logic Channels.	3.3.7 Completion Time for Required Action A.2	Table 3.5.1-1 Note 8
3.3B M3	Adopted 1 hour Completion Time to place a channel in trip where no completion time is specified in the CTS for inoperable ESAS Instrument Channels.	3.3.5 Completion Times for Required Actions A.1 and B.1	Table 3.5.1-1 Note 6
3.3B M4	The Completion Times of ITS 3.3.5 Required Action B.2.2 and ITS 3.3.6 Required Action B.2 are adopted (36 hours to Mode 5) in lieu of the CTS times (84 hours) when the minimum requirements for ESAS channels are not met.	3.3.5 Completion Time for Required Action B.2.2 and 3.3.6 Completion Time for Required Action B.2	Table 3.5.1-1 Notes 1 and 5
3.3B M5	The Completion Times of ITS 3.3.5 Required Action B.1 and ITS 3.3.6 Required Action B.1 are adopted (6 hours to Mode 3) in lieu of the CTS times (12 hours) when the minimum requirements for ESAS channels are not met.	Completion Time for Required Action B.1 of 3.3.5 and 3.3.6	Table 3.5.1-1 Note 1

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3C M1	Adopted 1 hour Completion Time to place an inoperable channel in trip or bypass and adopted ITS 3.3.11 ACTION B for two channels inoperable regarding the Emergency Feedwater (EFW) Initiation and Main Steam Line (MSL) Isolation functions where no like requirements are specified in CTS Table 3.5.1-1.	3.3.11 ACTION A and B	Table 3.5.1-1
3.3C M2	Since the EFIC function is necessary to ensure sufficient heat removal capability in Mode 3, the ITS Applicability for the Steam Generator (SG) Low Level function of Modes 1, 2, and 3, including a Required Action to place the unit in Mode 4 is adopted in lieu of the CTS Table 3.5.1-1 Note 1 implied Applicability of Modes 1 and 2.	Table 3.3.11-1 Function 1.b and 3.3.11 Required Action D.2	Table 3.5.1-1 EFIC Functional Unit 1.b
3.3C M3	Adopted LCO, Applicability, and ACTION requirements for EFW Vector Valve Control within ITS 3.3.11 and Table 3.3.11-1 where only surveillance requirements existed in the CTS Table 4.1-1 Item 56.	3.3.11, Table 3.3.11-1 Functions 2.a and 2.b	Table 4.1-1 Item 56.
3.3C M4	Adopted 3.3.11 Applicability and Required Action to reduce SG pressure to < 750 psig where the CTS only required a reduction to hot shutdown (subcritical with RCS temperature ≥ 525 °F) conditions and did not specify a specific Applicability for the SG Pressure Low function.	Table 3.3.11-1 Function 3.a Note (b) and 3.3.11 Required Action F.2	Table 3.5.1-1 EFIC Functional Units 2.b and 3.b, and Notes 1 and 19
3.3C M5	The Completion Times of ITS 3.3.11 Required Actions D.1 and F.1, 3.3.12 Required Actions C.1 and D.1, and 3.3.13 Required Actions B.1 and C.1 are adopted (6 hours to Mode 3) in lieu of the CTS times (12 hours) when the minimum requirements for EFIC channels are not met.	Completion Time for 3.3.11 Required Actions D.1 and F.1, 3.3.12 Required Actions C.1 and D.1, and 3.3.13 Required Actions B.1 and C.1	Table 3.5.1-1 Note 1 for all EFIC Functional Units
3.3C M6	Since the EFIC function is necessary to ensure sufficient heat removal capability in Mode 3, the ITS Applicability for the Manual Initiation function of Modes 1, 2, and 3, including a Required Action to place the unit in Mode 4 is adopted in lieu of the CTS Table 3.5.1-1 Note 1 implied Applicability of Modes 1 and 2.	3.3.12 Applicability and Required Actions C.2, D.2.1, and D.2.2	Table 3.5.1-1 EFIC Functional Units 1.a, 2.a, and 3.a

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3C M7	Adopted specific controls for the EFIC MSL Isolation Logic in the ITS not specifically identified in the CTS to ensure necessary logic trains will function when required.	3.3.13	N/A
3.3C M8	Adopted ITS requirements for the EFIC EFW Vector Valve Logics not specifically identified in the CTS.	3.3.14	N/A
3.3C M9	Adopted 3.3.11 Required Action F.2.1 requiring a SG pressure reduction to < 750 psig for the EFW initiation low SG pressure function where CTS Table 3.5.1-1 Note 1 required only entry into CTS condition of Hot Shutdown (subcritical with RCS temperature ≥ 525 °F).	3.3.11 Required Action F.2.1 for Table 3.3.11-1 Function 1.c	Table 3.5.1-1 EFIC Functional Unit 1.c and Notes 1 and 19
3.3C M10	Adopted the Allowable Values Column and applicable values of ITS Table 3.3.11-1 for the EFIC functions of CTS Table 3.5.1-1 where no such column existed in the CTS.	3.3.11 and Table 3.3.11-1	Table 3.5.1-1 EFIC Functional Units

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement											
3.3D M1	Adopted 1 hour Completion Time before declaring the affected Emergency Diesel Generator (EDG) inoperable of ITS 3.3.8 to restore an inoperable Degraded Voltage Monitoring function where the CTS allowed 72 hours for restoration.	3.3.8 Required Action A.1	Table 3.5.1-1 Note 14											
3.3D M2	Adopted ITS SR 3.3.15.1 requiring a CHANNEL CHECK of applicable hydrogen monitoring instrumentation where no CHANNEL CHECK was required in the CTS.	SR 3.3.15.1	N/A											
3.3D M3	Adopted ITS PAM Function 9 Applicability of Modes 1, 2, and 3 in lieu of the CTS equivalent of Modes 1 and 2.	Table 3.3.15-1 Function 9	3.5.1.1, Table 3.5.1-1											
3.3D M4	Adopted additional requirements of ITS 3.3.16 ACTIONS C and D which do not exist for CTS Table 3.5.1-1 Functional Unit 14 relevant to inoperable control room isolation features.	3.3.16 ACTIONS C and D	Table 3.5.1-1 Functional Unit 14											
3.3D M5	Omitted the 6 hour Completion Time provided by the CTS if a control room isolation channel is inoperable for > 7 days.	N/A	Table 3.5.1-1 Note 18											
3.3D M6	Extended Applicability for the Borated Water Storage Tank (BWST) level PAM instrumentation to include Modes 1 and 2, and all of Mode 3, not just when RCS pressure is ≥ 300 psig, as specified in CTS.	3.3.15 Applicability for Function 15 in Table 3.3.15-1	3.3.1											
3.3D M7	<p>Additional Type A and Category 1 Post Accident Monitoring (PAM) functions not found in the CTS are incorporated into the ITS including applicable LCO, Applicability, ACTIONS, SRs, and Notes for:</p> <table><tr><td>Wide Range Neutron Flux</td><td>RCS Hot Leg Temperature</td></tr><tr><td>Condensate Storage Tank Level</td><td>Steam Generator (SG) A and B Water Level – High</td></tr><tr><td>Reactor Building Spray Flow</td><td>Automatic Reactor Building Isolation Valve Position</td></tr><tr><td>High and Low Pressure Injection Flow</td><td></td></tr></table> <p>The 31-day CHANNEL CHECK frequency chosen for the High and Low Pressure Injection Flow instruments is based on operating experience that has demonstrated that failure is rare. The following instruments were required for actuation functions in the CTS and are now additionally required for the PAM function in ITS:</p> <table><tr><td>RCS Pressure</td><td>SG A and B Water Level – Low Range</td><td>SG A and B Pressure</td></tr></table>	Wide Range Neutron Flux	RCS Hot Leg Temperature	Condensate Storage Tank Level	Steam Generator (SG) A and B Water Level – High	Reactor Building Spray Flow	Automatic Reactor Building Isolation Valve Position	High and Low Pressure Injection Flow		RCS Pressure	SG A and B Water Level – Low Range	SG A and B Pressure	<p>3.3.15, Table 3.3.15-1 Functions:</p> <ul style="list-style-type: none">• 1, 2, 8, 12b, 12d, 14, 20• 4• 12a, 12c, 13a, 13b• 18, 19• SRs 3.3.15.1 and 3.3.15.2	<p>Table 3.5.1-1 ESAS Functional Units:</p> <ul style="list-style-type: none">• N/A• 1.a, 2.a• EFIC Functional Units 1.b and 1.c• N/A• Table 4.1-1 Items 15.a, 17.a, 29
Wide Range Neutron Flux	RCS Hot Leg Temperature													
Condensate Storage Tank Level	Steam Generator (SG) A and B Water Level – High													
Reactor Building Spray Flow	Automatic Reactor Building Isolation Valve Position													
High and Low Pressure Injection Flow														
RCS Pressure	SG A and B Water Level – Low Range	SG A and B Pressure												

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3D M8	The specific Applicability of Modes 1, 2 and 3 is incorporated into the ITS for PAM functions that had an implied, but not specifically stated, Applicability of Modes 1 and 2 in the CTS.	Table 3.3.15-1 Functions: <ul style="list-style-type: none"> • 10 • 11 and 17 • 3 and 5 • 16 • 6 and 7 	<ul style="list-style-type: none"> • 3.14.4 Table 3.5.1-1 Notes: <ul style="list-style-type: none"> • 10 • 28 and 29 • 22 • 21
3.3D M9	The CTS requirement for one operable Emergency Feedwater Flow (EFW) PAM instrument channel per steam generator is increased to two in the ITS for a total of four channels.	Table 3.3.15-1 Function 17a and 17b	Table 3.5.1-1 Other Functional Unit 3
3.3D M10	STS 3.3.17 ACTIONS are adopted, allowing 30 days to either restore one required inoperable PAM channel to operable status or submit a Special Report submitted, and only 7 days if both channels are inoperable. This is more restrictive than CTS which contain no restriction on operation with one inoperable channel and allow 30 days to restore both channels. If the Required Actions and associated Completion Times are not met, ITS requires a unit shutdown to Mode 3 in 6 hours which is more restrictive than the CTS Completion Time of 12 hours.	3.3.15 Required Actions A.1, B.1, C.1, F.1, and F.2 for PAMs 6, 7, 11, 15, 16, 17	3.3.6 and Table 3.5.1-1 Notes 10, 21, and 22
3.3D M11	Adopted ITS action to shutdown to Mode 3 in 6 hours when both hydrogen concentration monitors are inoperable for > 72 hours where CTS would allow 7 hours to Mode 3 for this condition.	3.3.15 Required Actions F.1 and F.2 for PAM Function 10 of Table 3.3.15-1	3.14.4
3.3D M12	Adopted ITS requirement for both Degraded Voltage relays to be operable on each 480 Volt vital bus as opposed to one relay required for operability in the CTS.	LCO 3.3.8	Table 3.5.1-1 Functional Unit 8.b

Table M – More Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4A M1	Adopted ITS ACTIONS to limit Mode 1 and 2 operation equivalent to "critical" conditions in the CTS when the required number of Reactor Coolant Pumps (RCP) are not operable to 18 hours before placing the plant in Mode 3 within the next 6 hours where the CTS allowed continued operation for 24 hours in this condition.	3.4.4 Required Actions A.1 and B.1, 3.4.4 Applicability	3.1.1.1.A, Table 2.3 1 Note (d) and Headings
3.4A M2	Omitted the CTS exception to 3.0.3 relevant to Reactor Coolant System (RCS) leak testing.	N/A	3.1.2.2
3.4A M3	Adopted additional ITS surveillances to ensure required RCS loop(s) in service in Modes 1, 2, 3.	SR 3.4.4.1, SR 3.4.5.1	N/A
3.4A M4	Adopted ITS LCO requiring operability of both steam generators (SG) as a decay heat removal (DHR) method if only one DHR loop is operable where the CTS required any combination of two DHR methods to be operable.	LCO 3.4.7	3.1.1.6
3.4A M5	Adopted a specific Completion Time 72 hours (prior to entering Mode 4 if already shutdown) not found in the CTS for performing impact evaluations related to RCS fracture toughness properties of CTS 3.1.2.6.	3.4.3 Required Actions B.2 and D.2, Condition B and D Notes	N/A <i>Correct CTS m/u page 18a</i>
3.4A M6	Adopted ITS requirement to place the unit in a subcritical condition (Mode 3) when the reactor is determined to not remain in an acceptable condition in relation to RCS fracture toughness evaluations where the CTS required a power reduction to < 2% RTP.	3.4.3 Required Action C.1	3.1.2.6
3.4A M7	Adopted ITS frequencies where none existed in CTS 3.1.2 for verifying RCS pressure and temperature limits during heatup and cooldown.	SRs 3.4.3.1, 3.4.3.2, 3.4.3.3, and 3.4.3.4	N/A
3.4A M8	Adopted required actions of ITS to perform evaluations and place the unit in Mode 3 when RCS pressure or temperature limits are exceeded for critical conditions where no such requirements existed in CTS 3.1.3.7.	3.4.3 Required Actions B.2 and C.1	N/A
3.4A M9	Adopted ITS requirement for unit shutdown if operating in Modes 1 or 2 and either SG becomes inoperable where the CTS allowed up to 24 hours prior to requiring a shutdown.	3.4.4 Required Action B.1	3.4.2
3.4A M10	Adopted ITS limits for RCS pressure, temperature and flow for departure from nucleate boiling where such limits were not found in the CTS.	3.4.1	N/A

Table M – More Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4A M11	Retained CTS Applicability for the minimum temperature for criticality of Modes 1 and 2 ($K_{eff} \geq 0.99$) in lieu of the ITS Applicability of Modes 1 and 2 with $K_{eff} \geq 1.0$.	3.4.2 Applicability	3.1.3
3.4A M12	Adopted ITS restriction not found in CTS 3.1.1.6 that prevents further RCS draining operations when the required DHR loop is secured in Mode 5 with the RCS loops not filled.	LCO 3.4.8 Note 1.b	N/A
3.4A M13	Adopted ITS SRs not found in the CTS to periodically verify the standby DHR loop is ready to be placed in service.	SR 3.4.7.3, SR 3.4.8.2	N/A
3.4A M14	Adopted ITS SR not found in CTS 3.1.3 to periodically verify requirements associated with the minimum temperature for criticality.	SR 3.4.2.1	N/A
3.4A M15	Not used.	N/A	N/A
3.4A M16	Adopted ITS restriction not found in the CTS to suspend all RCS draining operations if DHR loops are not in service as required.	3.4.8 Required Action B.2	N/A

Table M – More Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4B M1	The CTS Surveillance requirement to evaluate RCS Leakage is revised to specify that this verification is to be accomplished using the Water Inventory Balance method. This change adopts the STS requirement for RCS Leakage verification.	SR 3.4.13.1	Table 4.1-2, Item 6.a
3.4B M2	Adopted STS Required Action for a condition in which neither pressurizer safety valve is operable while in Mode 3 and Mode 4 with RCS > LTOP enable temperature. Also adopted STS Applicability requiring operability of two pressurizer safety valves when in Modes 1 and 2. The corresponding CTS requirement applies “when the reactor is critical”.	3.4.10 Applicability, 3.4.10 Condition B and Required Action C.1	3.1.1.3.A, 3.1.1.3.B
3.4B M3	Adopted Required Actions for Conditions in which LTOP System requirements are not satisfied. Additionally, Surveillance Requirements are adopted for verification of LTOP requirements.	3.4.11 Required Actions A.1, B.1, B.2, C.1, D.1, and E.1, SR 3.4.11.1 through SR 3.4.11.4	3.1.2.9, 3.1.2.10, and 3.1.2.11, Table 4.1-2, Item 17
3.4B M4	Adopted STS Surveillance Frequency for verification of the operability of the Electromatic Relief Valve (ERV) and for verification of the operability of the Decay Heat Automatic Closure and Interlock System.	SR 3.4.11.5, SR 3.4.14.2, SR 3.4.14.3, SR 3.4.14.4, and SR 3.4.14.5	Table 4.1-2, Item 11 and Item 17
3.4B M5	Removed CTS text that provides an exception to the Reactor Coolant System (RCS) leakage specification, which allows up to 30 gpm leakage from the RCS, provided it is capable of being returned to the RCS.	1.1, LCO 3.4.13.c	3.1.6.8
3.4B M6	Adopted STS Required Action to place the unit in Mode 3 for a Condition in which the Required Actions are not met when Reactor Building atmosphere radioactivity monitoring instrumentation is inoperable.	3.4.15 Required Action C.1	3.1.6.7
3.4B M7	Adopted STS Applicability for LCO that requires Core Flood Tank isolation during Low Temperature Overpressure Protection (LTOP) System operations.	3.4.11 Applicability	3.1.2.9

Table M – More Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4B M8	Not used.	N/A	N/A
3.4B M9	Adopted STS Applicability requiring pressurizer water level to be ≥ 45 inches and ≤ 320 inches when in Modes 1, 2, 3, and 4 with the RCS temperature $> 262^{\circ}\text{F}$. Added a Surveillance Requirement for verification that pressurizer level is maintained within the safety analysis assumptions. Adopted STS Applicability requiring operability of pressurizer heaters in Modes 1, 2, and 3.	3.4.9 Applicability, SR 3.4.9.1, 3.4.9 Required Actions B.2, C.1, D.1, D.2	3.1.3.4, 3.1.3.6
3.4B M10	Not used.	N/A	N/A
3.4B M11	Not used.	N/A	N/A
3.4B M12	Adopted STS Required Action to place the unit in Mode 3 with RCS temperature $< 500^{\circ}\text{F}$ within 6 hours, for a Condition in which RCS Specific Activity is not restored to within limits within the allowed time.	3.4.12 Required Action B.1	3.1.4.1.c
3.4B M13	Adopted STS Applicability for LCOs addressing RCS Operational Leakage and RCS Leakage Detection Instrumentation. Adopted STS Required Action to place the unit in Mode 5 within 36 hours for the Condition in which RCS leakage is not reduced to within limits within the allowed time. Also adopted STS Required Actions and Completion Times when RCS primary to secondary leakage is not reduced to within limits in the allowed time.	3.4.13 Applicability 3.4.15 Applicability 3.4.13 Required Action C.1, C.2	3.1.6.1, 3.1.6.2, 3.1.6.3, 3.1.6.7
3.4B M14	Adopted STS Required Action and Completion Time for a Condition in which the Decay Heat Removal (DHR) System Autoclosure Interlock function is inoperable.	3.4.14 Required Action B.1	Table 3.5.1-1, Notes 1 and 5
3.4B M15	Adopted STS Condition, Required Action, and Completion Time for a condition in which both the reactor building sump monitor and both of the reactor building atmosphere radioactivity monitors are inoperable.	3.4.15 Condition D	3.1.6.7

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5 M1	Not used	N/A	N/A
3.5 M2 open	Adopted Completion Times totaling 12 hours to place the unit in Mode 3 for a Condition in which one Core Flood Tank (CFT) is inoperable for reasons other than an unacceptable boron concentration. The CTS cumulative time frame for placing the unit in Mode 3 is 36 hours; therefore, this change is more restrictive. Also adopted is the STS Completion Time of 12 hours for removing the unit from the applicable modes of the LCO for conditions in which Core Flood Tanks are not restored to an operable status.	3.5.1 Conditions B & C	3.3.6
3.5 M3	Adopted Frequency of 12 hours for verification of the Core Flood Tank (CFT) boron concentration following each inventory addition. CTS requires CFT sampling and analysis after each makeup, however the time limit for this verification is not specified.	SR 3.5.1.4	Table 4.1-3, Item 3
3.5 M4	Adopted STS Surveillance Requirements to verify that Core Flood Tanks are operable and available for injection consistent with the safety analysis. These specific surveillances are not explicitly required by CTS.	SR 3.5.1.1 SR 3.5.1.2 SR 3.5.1.3	3.3.3
3.5 M5	Adopted STS Surveillance Requirement for verification that power is removed from each Core Flood Tank isolation valve operator when RCS pressure is > 800 psig.	SR 3.5.1.5	3.3.3(C)
3.5 M6	Not used.	N/A	N/A
3.5 M7	Adopted STS Surveillance Requirements for verification of Borated Water Storage Tank (BWST) operability. Adoption of these surveillances also imposes an upper limit on BWST temperature that is not found in CTS.	SR 3.5.4.1 SR 3.5.4.2	3.3.1(G)
3.5 M8	Adopted STS Applicability for the required Low Pressure Injection trains and the Borated Water Storage Tank. This change results in ITS imposing operability requirements for these components at lower RCS pressures than is currently required by CTS.	LCO 3.5.3, LCO 3.5.3, LCO 3.5.4	3.3.1

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5 M9	Adopted STS Completion Times to place the plant in Mode 3 for a condition in which the Borated Water Storage Tank (BWST) boron concentration or BWST temperature is not maintained within required limits.	3.5.4 Required Actions A.1 and C.1	3.3.6
3.5 M10	Adopted STS Completion Times to place the plant in Mode 3 for a condition in which the Borated Water Storage Tank (BWST) is inoperable for reasons other than boron concentration or BWST water temperature outside specified limits.	3.5.4 Required Actions B.1 and C.1	3.3.6
3.5 M11	Adopted STS Completion Time to place the plant in Mode 5 for a condition in which Borated Water Storage Tank parameters are not restored to operable status within the required Completions Times.	3.5.4 Condition C	3.3.6
3.5 M12	Adopted STS Surveillance Requirement for verification that each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position. CTS does not contain a similar surveillance requirement.	SR 3.5.2.1	4.5
3.5 M13	STS Surveillance Requirement is adopted for verification that, by visual inspection, each ECCS train reactor building sump suction inlet is not restricted by debris and screens show no evidence of structural distress or abnormal corrosion. CTS does not contain a similar surveillance requirement.	SR 3.5.2.5	4.5
3.5 M14	Adopted Surveillance Requirements applicable to the STS Emergency Core Cooling -Shutdown LCO (i.e. for demonstration of the operability of two Low Pressure Injection trains). CTS does not explicitly require these surveillances.	SR 3.5.2.1, SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4, SR 3.5.2.5	4.5
3.5 M15	Adopted STS Completion Times for conditions and required actions in which Core Flood Tank Level or Core Flood Tank pressure cannot be verified.	3.5.1 Condition B	3.3.7(B)
3.5 M16	Adopted Completion Time to be in Mode 3 with RCS temperature $\leq 350^{\circ}\text{F}$ if one or more ECCS trains are inoperable and not restored to operable status within 72 hours.	3.5.2 Condition B	3.3.6

Table M – More Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 M1	Adopted STS Applicability for reactor building integrity and systems of Modes 1, 2, 3, and 4, which is not reliant on the additional CTS applicability of RCS pressure > 300 psig.	Applicability for 3.6.1, 3.6.2, 3.6.3, 3.6.4 and 3.6.5	3.3.1, 3.6.1, 3.23.1, 4.26.1
3.6 M2	Adopted STS requirement to place the unit in Mode 3 in lieu of the CTS Hot Standby (Mode 2) requirement when reactor building integrity cannot be met.	3.6.1 and 3.6.4 Required Action B.1, 3.6.2 and 3.6.3 Required Action D.1	3.6.1, 3.6.4
3.6 M3	Adopted STS applicability for reactor building pressure and isolation valves of Modes 1, 2, 3, and 4 implied, but not specifically stated, in the CTS.	Applicability for 3.6.3 and 3.6.4	3.6.4, 3.6.6
3.6 M4	Adopted the STS requirement to verify the position of reactor building isolation valves every 31 days in lieu of the CTS requirement of "prior to criticality..." and included in the verification a check of blind flanges not specified in CTS 3.6.5.	SR 3.6.3.2, SR 3.6.3.3	3.6.5
3.6 M5	Adopted the STS action requirements for inoperable reactor building isolation valves not specified in CTS 3.6.	3.6.3 ACTIONS Notes 2 and 3, 3.6.3 Required Action A.2, 3.6.3 ACTIONS B and C	3.6.1 and 3.6.6
3.6 M6	Not used.	N/A	N/A
3.6 M7	Adopted the STS NaOH tank volume surveillance frequency not found in the CTS of 184 days.	SR 3.6.6.2	3.3.4(B), Table 4.1-3 Item 6
3.6 M8	Adopted maximum restoration time limit of the STS for concurrent reactor building spray and cooler inoperabilities where the CTS allowed independent application of restoration times without restriction.	3.6.5 ACTIONS A and B Completion Times	3.3.6, 3.3.7
3.6 M9	Not used.	N/A	N/A

Table M – More Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 M10	Adopted STS SRs and frequencies not found in CTS 3.3 for periodic verification of reactor building spray and spray additive systems valve positions and actuation verification of the spray additive system valves.	SR 3.6.6.1, SR 3.6.6.4, SR 3.6.5.1	3.3
3.6 M11	Adopted the STS requirements to lock and periodically verify locked any inoperable air lock door. Also adopted the SR notes which relate to comparing any air lock leakage with the total reactor building leak rate criteria.	3.6.2 Required Actions A.2 and A.3, SR 3.6.2.1 Notes	1.7
3.6 M12	Adopted the STS guidance and requirements not specified in the CTS for personnel air lock door interlocks and the requirements for conditions of air lock inoperability other than those related to an inoperable door or interlock.	3.6.2 ACTIONS B and C, SR 3.6.2.2	1.7, 3.6.1
3.6 M13	Adopted STS SR not found in CTS 3.6.4 for periodic verification that reactor building pressure remains within limits.	SR 3.6.4.1	3.6.4
3.6 M14	Revised the CTS reactor building pressure range, reducing the range to ≥ -1 psig and ≤ 3.0 psig in order to provide consistency with the STS, the ECCS analysis, and the control room indication of reactor building pressure.	LCO 3.6.4, SR 3.6.4.1	3.6.4
3.6 M15	Adopted STS requirement not found in the CTS to periodically verify the positions of reactor building spray valves.	SR 3.6.5.1	4.5.2.1.1, 4.5.2.2.2
3.6 M16	Omitted the CTS statement that the provisions of TS 3.0.3 are not applicable to events associated with inoperable reactor building isolation valves.	3.6.3	3.6.5
3.6 M17	Not used.	N/A	N/A
3.6 M18	Adopted STS Completion Time to be in Mode 3 in 6 hours in lieu of the CTS 36-hour allowance for conditions when the operability requirements for two trains of reactor building cooling and spray and a spray additive system cannot be met.	3.6.5 ACTION D, 3.6.6 ACTION B	3.3.4, 3.3.6
3.6 M19	Adopted the STS Mode 3 and 4 restoration time limit of 36 hours for reactor building spray and cooler inoperabilities not found in the CTS and adopted the STS Completion Time to be in Mode 5 in 36 hours in lieu of the 72 hours allowed in the CTS.	3.6.5 ACTIONS E and F	3.3.1, 3.3.6

Table M – More Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 M20	Adopted ITS Action to be in Mode 3 in 6 hours when both reactor building spray trains are inoperable in Modes 1 and 2 where the CTS 3.36 implication to enter TS 3.0.3 would have allowed up to 13 hours to be in Mode 3.	3.6.5 ACTION G	3.3.1, 3.3.4, 3.3.5, 3.3.6, and 3.3.7
3.6 M21	Not used.	N/A	N/A
3.6 M22	Adopted STS requirement not specifically identified in the CTS to place the unit in Mode 3 within 6 hours of a reactor building penetration valve being declared inoperable.	3.6.3 Required Action D.1	3.6.6, 3.6.1
3.6 M23	Omitted CTS 4.4.1.4 reactor building isolation valve stroke testing requirements in favor of the Inservice Test Program (IST) requirements which require testing of valves that cannot be stroked during power operation to be tested quarterly during a shutdown of sufficient duration.	SR 3.6.3.4	4.4.1.4

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 M1	Adopted STS Completion Times to be in Mode 3 in 6 hours (CTS 12 hours) and Mode 4 in 12 (24 hours for CST) hours (CTS provides 48 hour restoration period and then 24 hours to cold shutdown) for inoperabilities associated with main steam safety valves (MSSV) and the condensate storage tank (CST).	3.7.1 and 3.7.6 ACTION B	3.4.2
3.7 M2	Adopted the STS requirement that 7 MSSVs must be operable on each steam line. The CTS did only specified a total of 14 MSSVs without regard to a how many were operable on each steam line.	LCO 3.7.1	3.4.1.2
3.7 M3	Adopted STS requirement for operability of the Fuel Handling Area Ventilation System (FHAVS) which was not specifically identified in the CTS.	LCO 3.7.12	3.15.1
3.7 M4	The CTS requirements for main feedwater isolation are revised to include additional feedwater valves that are credited for isolation in the safety analysis, but were not required in the CTS. The overall Completion Time for restoration and shutdown to Mode 5 is also reduced by the STS to 84 hours in lieu of the CTS allowance of 108 hours. In addition, the STS action not found in the CTS to verify inoperable isolation valves remain closed periodically is adopted. Finally the CTS requirements are revised to require a feedwater supply line to be isolated within 8 hours if more than one main feedwater isolation valve in a supply train is inoperable.	3.7.2 Required Action C.2, LCO 3.7.3 and 3.7.3 ACTIONS	3.4.1, 3.4.1.5, 3.4.2, Table 4.1-2 Item 14
3.7 M5	Adopted STS requirements not specified in the CTS for stroke time testing and functional testing of MSIVs and MFIVs and the provision to perform such testing in Mode 3 by incorporation of SR Notes.	SR 3.7.2.1 and 3.7.3.1 and associated Note, SR 3.7.2.2 and associated Notes 1 and 2, and SR 3.7.3.2 and associated Notes 1 and 2	Table 4.1-2 Items 13.b and 14.b
3.7 M6	Expanded the CTS requirement for CST operability to include Mode 4 when the SGs are being relied upon for heat removal as is consistent with the STS and the requirements of the emergency feedwater (EFW) system.	3.7.6 Applicability	3.4.1

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 M7	Adopted additional requirement of the STS to verify availability of the backup water supply source (SW) periodically when the CST is inoperable and reduces the Completion Time found in the CTS from 12 hours to 6 hours to be in Mode 3 and 72 hours to 24 hours to be in a non-applicable mode. Also adopted a SR not found in the CTS to periodically verify CST volume.	3.7.6 ACTIONS and SR 3.7.6.1	3.4.2
3.7 M8	Adopted new Completion Time to restore all EFW inoperabilities within 10 days of the initial inoperability to prevent unlimited continued operation with an EFW component inoperable.	3.7.5 ACTIONS A and B Completion Times	3.4.4.2 and 3.4.4.3
3.7 M9	Adopted the ITS Applicability for SW system operability of Modes 1, 2, 3 and 4 without reliance on RCS pressure as provided in the CTS.	3.7.7 Applicability	3.3.1
3.7 M10	Adopted ITS SR not identified in CTS 3.3.1 to periodically verify required SW valves are secured in the proper position.	SR 3.7.7.1 and Note	N/A
3.7 M11	Adopted ITS Completion Times to be in Mode 3 and Mode 5, reducing the overall time from 108 hours in the CTS to 36 hours in the ITS.	3.7.7 ACTION B	3.3.6
3.7 M12	Adopted additional ITS SR detail not found in CTS requiring each SW automatic valve not secured in its correct position to be verified to actuate to its correct position upon receiving a signal and that the SW pumps will automatically start upon receipt of an actuation signal.	SR 3.7.7.2, SR 3.7.7.3	Table 4.1-2 Item 9
3.7 M13	Adopted the ITS Applicability for emergency cooling pond (ECP) and penetration room ventilation system (PRVS) operability of Modes 1, 2, 3 and 4 without reliance on RCS pressure as provided in the CTS.	3.7.8 and 3.7.11 Applicability	3.11.1 and 3.13.1
3.7 M14	Adopted STS requirement to place the unit in Mode 3 (a subcritical condition) instead of the CTS requirement to be in Hot Shutdown (not necessarily subcritical) when the requirements of secondary specific activity are not being met.	3.7.4 Required Action A.1	3.10
3.7 M15	Not used.	N/A	N/A
3.7 M16	Adopted the STS frequency for spent fuel pool (SFP) boron verification of 7 days in lieu of the CTS 30-day requirement.	SR 3.7.14.1	Table 4.1-3 Item 4

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 M17	Adopted additional actions of the STS to move non-complying fuel assemblies from Region 2 and, in the case of not meeting the SFP boron requirements, to restore SFP boron concentration within limits or verify the correct location of fuel assemblies within the pool.	3.7.14 Required Action A.2.2 and 3.7.15 Required Action A.1	3.8.16 and 3.8.17
3.7 M18	Adopted ITS restrictions of handling fuel in the SFP area relevant to inoperable control room emergency ventilation systems (CREVS) or control room emergency air conditioning systems (CREACS).	3.7.9 ACTIONS D and E, 3.7.10 Required Actions C.2 and D.1	3.9.1 and 3.9.2
3.7 M19	Not used.	N/A	N/A
3.7 M20	Adopted STS action not found in CTS 3.13.3 to place the unit in Mode 3 within 6 hours if an inoperable penetration room ventilation system (PRVS) is not restored to operable status within 7 days.	3.7.11 Required Action C.1	N/A
3.7 M21	Not used.	N/A	N/A
3.7 M22	Not used.	N/A	N/A
3.7 M23	Not used.	N/A	N/A
3.7 M24	Adopted ITS requirements not found in the CTS to reduce power and to reduce the nuclear overpower high trip setpoints when the required number of MSSVs are not operable.	3.7.1 ACTION A	N/A
3.7 M25	Adopted ITS SR not required in CTS 4.17 to periodically verify the fuel handling area ventilation system (FHAVS) to be in operation.	SR 3.7.12.1	N/A
3.7 M26	Adopted ITS requirement to perform steam-driven EFW pump testing within 24 hours of reaching 750 psig SG pressure, which occurs sooner during plant heatup than the CTS requirement of 525°F.	SR 3.7.5.2 Note	4.8.1.a.1
3.7 M27	Adopted ITS requirement to perform steam-driven EFW pump and supply valve automatic actuation testing prior to reaching Mode 3 (280°F), which occurs sooner during plant heatup than the CTS requirement of 525°F.	SR 3.7.5.3, SR 3.7.5.4	4.8.1.e.2
3.7 M28	Adopted ITS requirements for SFP level not found in CTS 3.815 through 3.8.18.	LCO 3.7.13	N/A

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7 M29	Adopted additional STS control room ventilation testing requirements not found in CTS 4.10.2 to periodically verify the system makeup airflow rate.	SR 3.7.9.4	N/A

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8 M1	Specific requirements that did not exist in the CTS for inverters in Modes 1, 2, 3, and 4 are adopted.	3.8.7	N/A
3.8 M2	Extended the requirements for operability of support systems (emergency diesel generator auxiliaries) and adopted specific specifications for AC Sources, DC Sources, Inverters, and Distribution Systems in Modes 5 and 6 not found in the CTS.	3.8.2, 3.8.3, 3.8.5, 3.8.8, and 3.8.10	N/A
3.8 M3	The 24-hour delay when the conditions of CTS 3.7.2 cannot be met is omitted and covered under LCO 3.0.3 in the ITS.	LCO 3.0.3	3.7.2.A
3.8 M4	Adopted additional required action to verify breaker alignments and power availability within 1 hour and periodically thereafter upon inoperability of an offsite circuit or emergency diesel generator (EDG) which was not required in the CTS.	3.8.1 Required Actions A.1 and B.1	N/A
3.8 M5	Adopted the ITS maximum restoration period which prevents unlimited AC source or Distribution System inoperability due to concurrent losses of equipment where no such restriction existed in the CTS.	3.8.1 Required Actions A.3 and B.4, 3.8.9 Required Actions A.1, B.1, C.1	N/A
3.8 M6	Not used.	N/A	N/A
3.8 M7	Not Used	N/A	N/A
3.8 M8	Omitted the CTS 1-hour Completion Time to place Startup Transformer #2 (ST2) feeder breaker handswitches in pull-to-lock when the selective load-shed feature is inoperable. This, in turn, deletes the necessity for the associated Special Report requirement.	3.8.1 Required Action A.1	3.7.2.H, 6.12.5
3.8 M9	Adopted the ITS weekly surveillance to verify offsite power availability not required in the CTS.	SR 3.8.1.1	N/A
3.8 M10	Not used.	N/A	N/A
3.8 M11	Adopted new fuel oil testing and required action if oil samples indicate out-of-spec conditions not required in the CTS.	SR 3.8.3.2, 3.8.3 ACTION C	N/A
3.8 M12	Specific acceptance criteria not found in CTS 4.6.1.2 is adopted for proper verification of EDG operation following a Loss of Offsite Power (LOOP) and following a LOOP with a concurrent safety system actuation.	SR 3.8.1.8, SR 3.8.1.9	N/A

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8 M13	Not used.	N/A	N/A
3.8 M14	Periodic verification of proper breaker alignment and power availability for safeguards and instrument buses is adopted to provide specific method for determining bus operability not found in the CTS.	SR 3.8.9.1	N/A
3.8 M15	Adopted 1-hour run time for EDG testing in lieu of the CTS condition of until "temperatures stabilize" which historically is always less than or equal to 1 hour.	SR 3.8.1.3	4.6.1.1
3.8 M16	The 2-hour allowance provided in the CTS to take action when a redundant component to one that has an inoperable power source becomes inoperable is omitted in favor of the 1-hour LCO 3.0.3 provision.	LCO 3.0.3	3.0.5
3.8 M17	The CTS allowance to not test the operable EDG when one EDG is inoperable if the operable EDG has been tested within the previous 24 hours is omitted in the ITS.	N/A	3.7.2.C
3.8 M18	Adopted ITS SR not found in the CTS that requires each EDG fuel oil day tank to be periodically checked for accumulated water and the water removed as necessary.	SR 3.8.1.5	N/A
3.8 M19	Adopted ITS SR Notes that allow EDG starts to be preceded by an engine pre-lube, a warmup period prior to loading, and prohibits testing more than one EDG at a time not found in the CTS.	SR 3.8.1.2, SR 3.8.1.3 Notes 1, 2, 3, and 4, SR 3.8.1.8, SR 3.8.1.9	N/A
3.8 M20	Adopted ITS SR not found in the CTS that requires each EDG fuel oil storage tank to be periodically checked for accumulated water and the water removed as necessary.	SR 3.8.3.4	N/A

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9 M1	Adopted STS requirement not found in the CTS to verify proper breaker alignment and power availability to the standby decay heat removal pump every 7 days when the reactor coolant water level is less than 23 feet above the fuel seated in the reactor vessel.	SR 3.9.5.2	N/A
3.9 M2	Not used.	N/A	N/A
3.9 M3	Omitted the CTS alternative to restore inoperable decay heat removal equipment to an operable status. This is adopted as a requirement and not an alternative in the ITS.	3.9.4 Required Action A.2, 3.9.5 Required Actions A.1 and B.2	3.8.3
3.9 M4	Adopted the STS applicability for reactor coolant boron concentration of Mode 6 (reactor vessel head detensioned while fuel is in the core) in lieu of the CTS applicability of only during reactor head removal and during fuel movement.	3.9.1 Applicability	3.8.4
3.9 M5	Adopted STS requirement not found in the CTS to verify reactor coolant boron concentration once every 12 hours when both source range neutron flux channels are inoperable.	3.9.2 Required Action B.2	N/A
3.9 M6	Adopted STS surveillance requirements for CHANNEL CHECK and CHANNEL CALIBRATION (excluding neutron detectors) for source range neutron instrumentation not found in the CTS.	SR 3.9.2.1, SR 3.9.2.2 plus Note	N/A
3.9 M7	Adopted STS surveillance requirement not found in the CTS to verify that reactor building isolation and purge isolation valves actuate to the isolated position when tested.	SR 3.9.3.2 plus Note	N/A
3.9 M8	Adopted STS surveillance requirement not found in the CTS to verify that reactor building penetrations are in the required status or position every 7 days.	SR 3.9.3.1	N/A
3.9 M9	Adopted STS ACTIONS and Completion Times not specified in CTS 3.8.10 for periods of inoperability regarding the reactor building purge isolation system.	3.9.3 ACTIONS	3.8.10
3.9 M10	Adopted STS surveillance requirement not found in the CTS to verify reactor coolant water level is at least 23 feet above the fuel seated in the reactor vessel every 24 hours.	SR 3.9.6.1	N/A
3.9 M11	Not used.	N/A	N/A
3.9 M12	Adopted the STS boron sampling frequency of every 72 hours, reducing the degree of scheduling flexibility afforded by the CTS frequency of 3 times per week.	SR 3.9.1.1	Table 4.1-3 Item 1.f

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9 M13	Adopted the STS fixed frequency for verifying the operability of the reactor building purge isolation system of every 18 months in lieu of the approximate CTS equivalent of within 7 days prior to refueling operations.	SR 3.9.3.3	3.8.10

Table M – More Restrictive Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 M1	Revised CTS 5.4.2 to include additional information describing the center-to-center distance between fuel assemblies in the spent fuel pool storage racks.	4.3.1.1.c	5.4.2
4.0 M2	Revised CTS 5.4.2 to include additional information concerning the number of available storage racks and the minimum drainage level of the spent fuel pool.	4.3.2, 4.3.3	5.4.2

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 M1	Additional experience and educational requirements are required in the ITS by the adoption of ANSI ANS 3.1-1978 in lieu of ANSI N18.1-1971 and by including the latest changes to the Quality Assurance Program Manual (QAPM) approved by the NRC on November 6, 1998 (TAC No. M97893).	5.3.1	6.3.1
5.0 M2	Not used.	N/A	N/A
5.0 M3	Incorporated procedural requirements for the Technical Specification Bases Control Program and the Safety Function Determination Program not found in the CTS. Also revised references for regulatory guides and generic letters applicable to procedural controls.	5.4.1	6.8.1
5.0 M4	Not used.	N/A	N/A
5.0 M5	Revised the CTS ventilation filter testing requirements to include differential pressure testing of the roughing and prefilters.	5.5.11.d	3.13.1.d, 3.15.1.d, 4.10.2.d.1, 4.11.1, and 4.17.1
5.0 M6	Not used.	N/A	N/A
5.0 M7	Adopted new programs Technical Specification Bases Control Program and the Safety Function Determination Program not found in the CTS.	5.5.14, 5.5.15	N/A
5.0 M8	Established the leak rate testing frequency for reactor building purge and exhaust isolation valves to be consistent with the ITS requirements for reactor building integrity which is more restrictive than current CTS requirements.	5.5.16	4.26.2
5.0 M9	Revised the CTS to include testing of new fuel oil delivered to the site.	5.5.13	4.6.1.4.e
5.0 M10	Deleted specific Regulatory Guide 1.52 section references from the CTS which results in the ventilation filter testing being required to meet all Regulatory Guide 1.52, Revision 2 requirements.	5.5.11.a.2, 5.5.11.b.2	4.10.2.b.1
5.0 M11	Incorporated specific system design flows not found in the CTS for the penetration room and fuel handling area ventilation systems.	5.5.11	3.13.1, 3.15.1, 4.11.1

Table L – Less Restrictive Changes
ITS Section 1.0 – Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 none	N/A	N/A	N/A	N/A

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
2.0 L1	The applicability for the RCS Pressure Safety Limit has been relaxed slightly to Modes 1, 2, 3, 4, and 5 as opposed to including all times when fuel remains within the reactor vessel.	2.1.2 RCS Pressure Safety Limit	2.2.1	2

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.0 – Limiting Condition for Operations (LCO) Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L1	Adopted STS LCO 3.0.4 and SR 3.0.4 into the ITS in place of CTS 3.0.4 and 4.0.4, allowing lower modes of operation to be entered without meeting the LCOs for those modes if complying with an Action Requirement that acts to place the unit in a shutdown and/or cooled down condition.	<ul style="list-style-type: none"> • LCO 3.0.4 • SR 3.0.4 	<ul style="list-style-type: none"> • 3.0.4 • 4.0.4 	2
3.0 L2	Adopted STS LCO 3.0.6 into the ITS in place of CTS 3.0.6, preventing the cascading of Actions provided justification is evident pursuant to the safety function determination program.	LCO 3.0.6	N/A	4
3.0 L3	Adopted STS SR 3.0.3 into the ITS in place of CTS 3.0.3, providing guidance and restrictions relevant to missed surveillances.	SR 3.0.3	4.0.3	3

CHANGE CATEGORIES

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|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.1 L1	Adopted STS Surveillance Frequency of 92 days for verification of Control Rod freedom of movement. CTS equipment test frequency for Control Rod Movement is specified as every two weeks.	SR 3.1.4.2	Table 4.1-2, Item 2	3
3.1 L2	Adopted STS Surveillance Requirement (SR), including its Note, for verification of Control Rod drop times. Adoption of this SR provides ANO-1 with the additional flexibility of testing Control Rod drop times with reactor coolant flow conditions other than full flow.	SR 3.1.4.3 plus Note	4.7.1.1	3
3.1 L3	CTS requires testing to ensure freedom of movement of each rod when above Cold Shutdown. Adoption of STS Surveillance Requirement for verification of Control Rod freedom of movement revises the applicability for this SR to apply only in Modes 1 and 2. Additionally, the SR will not require testing of APSRs.	SR 3.1.4.2	Table 4.1-2, Item 2	3
3.1 L4	Removed CTS requirements to exercise the remaining Control Rods, in the event that a Control Rod is declared inoperable.	3.1.4	3.5.2.2.2, 3.5.2.2.4	4
3.1 L5	CTS requires the unit to be placed in Hot Standby if, after one hour, Shutdown Margin (SDM) has not been verified to be greater than or equal to that required by the COLR. This action is required regardless of whether or not boration is in progress. This change adopts the requirements of STS 3.1.4 Required Action B, which directs the unit to be placed in Mode 3 within 6 hours. Adoption of this change allows continued operation after one hour, even if the required SDM has not been verified, provided boration has been initiated.	3.1.4 Required Action B	3.5.2.2.3	4
3.1 L6	Removed the CTS required action that is predicated on safety rod "groups" not being fully withdrawn. Adopted STS Required Action predicated on an "individual" rod basis and not a group position basis.	LCO 3.1.5	3.1.3.5, 3.1.3.7	4

CHANGE CATEGORIES

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|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.1 L7	Adopted STS Required Actions for verification of adequate SDM within “1 hour”, or initiation of boration within “1 hour” to restore adequate SDM if unable to verify SDM is within limits. CTS requires verification of SDM and initiation of boration “immediately” until the required SDM is restored.	3.1.4 Required Actions A.1.1, A.1.2, C.1.1, C.1.2 3.1.5 Required Actions A.1.1, A.1.2, B.1.1, B.1.2	3.5.2.1, 3.5.2.2.2	4
3.1 L8	CTS requirements for determining SDM have been modified by the adoption of the SDM definition in ITS 1.1. CTS assumes that the reactivity worth of any inoperable rod, regardless of the reason for inoperability, must be treated as though it will not insert into the core upon a reactor trip. ITS will require that only the reactivity worth of Control Rods which are not capable of being fully inserted need be considered for the SDM determination.	1.1 Definition of Shutdown Margin	3.5.2.2.3	4
3.1 L9	Adopted STS allowance for suspension of Moderator Temperature Coefficient (MTC) requirements during performance of Physics Testing in Mode 2.	3.1.9 Exception to LCO 3.1.3	3.1.7	2
3.1 L10	Adopted STS allowances for suspension of Control Rod Group Alignment Limits and APSR Alignment Limits during the conduct of Physics Tests. These STS allowances suspend requirements that do not have Physics Test exceptions in CTS.	3.1.8 Exceptions to LCO 3.1.4 and LCO 3.1.6 3.1.9 Exceptions to LCO 3.1.4 and LCO 3.1.6	3.1.8	2
3.1 L11	Adopted LCO 3.1.7, which maintains the CTS requirement that each Control Rod and APSR have one operable channel of position indication. Removed the surveillance requirement for cross-channel comparison of the Control Rod Absolute Position channel with the Control Rod Relative Position channel.	LCO 3.1.7, SR 3.1.7.1, SR 3.1.7.2	4.7.1.3, Table 4.1-1 Items 23 and 24	3

CHANGE CATEGORIES

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|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.1 L12	Adopted STS Surveillance Requirement that will require testing to verify freedom of movement of Control Rods while in Modes 1 and 2. Removed the CTS requirement to perform this test while in Modes 3 and 4.	SR 3.1.4.2	Table 4.1-2, Item 2	3
3.1 L13	Not used.	N/A	N/A	N/A
3.1 L14	Removed the shutdown actions associated with the CTS specification for the concentration of dissolved gases in the reactor coolant. CTS 3.1.9 limits for dissolved gases in the reactor coolant are relocated to the Technical Requirements Manual (TRM). The presence of dissolved gases in the reactor coolant beyond limits will not affect the safety function of the control rods to insert into the core.	N/A	3.1.9.3	1, 4

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.2 Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L1	Adopted STS Completion Time of 10 hours for actions associated with a condition in which Quadrant Power Tilt (QPT) is greater than the steady state limits specified in the COLR. CTS Completion Time for corresponding actions is 4 hours. The 10 hour Completion Time for these actions (reduce overpower setpoint, reduce regulating rod insertion limits, reduce Imbalance setpoints) is considered appropriate in view of the 2 hour Completion Time required for the action to reduce power $\geq 2\%$ for each 1% of QPT greater than the limit.	3.2.4 Required Actions A.1.2.2, A.1.2.3, A.1.2.4	3.5.2.4.2	6
3.2 L2	Not Used	N/A	N/A	N/A
3.2 L3	Adopted STS requirement to reduce Thermal Power to $\leq 20\%$ for the condition in which Quadrant Power Tilt (QPT) is greater than the maximum limit specified in the COLR. This change is less restrictive in that continued operation, below 20%, with QPT greater than the limit, will be allowed even when not performing Physics Testing. This change is consistent with STS 3.2.4 Action F, LCO 3.0.1, and LCO 3.0.2.	3.2.4 Condition D	3.5.2.4.3	2
3.2 L4	Adopted STS Completion Time that allows up to 24 hours to restore APSRs to within their limits provided that core power distribution is being monitored at 2 hour intervals as required by Required Action A.1. This change is less restrictive in the unit will be allowed to operate for a longer period of time with APSRs not within limits. However this is only allowed provided Linear Heat Rates remain within limits.	3.2.2 Required Action A.2	3.5.2.5.4	6

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.2 Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L5	Adopted STS Completion Time of 24 hours for Required Action to restore Axial Power Imbalance to within limits provided that core power distribution is being monitored at 2-hour intervals.	3.2.3 Required Action A.2	3.5.2.6.3, 3.5.2.6.4	6
3.2 L6	Adopted STS Completion Time for restoration of regulating rod groups to within limits for a Condition in which the groups are inserted into the restricted operation region. ITS provide a less restrictive Completion Time of 24 hours for restoration. However, this is only allowed provided that a surveillance is performed every 2 hours verifying that Linear Heat Rates are acceptable.	3.2.1 Required Action A.2	3.5.2.5.3	6
3.2 L7	Not Used	N/A	N/A	N/A
3.2 L8	Adopted STS Completion Time of 15 minutes to initiate boration to restore Shutdown Margin (SDM) for the Condition in which regulating rod groups are inserted in the unacceptable operating region. This change is less restrictive in that CTS requires the action to be initiated immediately.	3.2.1 Required Action D.1	3.5.2.1	6
3.2 L9	Adopted a Frequency of 12 hours for performance of the surveillance to verify Axial Power Imbalance is within limits as specified in the COLR. This change is less restrictive than the 2-hour frequency required by CTS, however, the change is considered acceptable because it is reasonable to expect that the operator will detect mechanisms that cause imbalance before limits are exceeded. This change is consistent with STS as modified by TSTF-110, Rev. 2.	SR 3.2.3.1	3.5.2.6.1	3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.2 Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L10	Adopted STS Required Action for performance of a surveillance verifying Linear Heat Rates are within acceptable limits for a Condition in which Quadrant Power Tilt (QPT) is not within limits. This change is considered less restrictive than CTS requirements in that a power reduction is not mandatory provided Linear Heat Rates are verified to be within limits. This is considered acceptable because this verification ensures that the safety analysis initial condition assumptions regarding core power distribution are preserved.	3.2.4 Required Action A.1.1, Required Action A.2	3.5.2.4	4
3.2 L11	Adopted STS Surveillance Frequency to verify Linear Heat Rate is within limits by using the Incore Detector System. CTS require performance of the surveillance on a 10 EFPD frequency. ITS will only require performance of the surveillance as directed by the Required Actions of LCOs for Control Rod Group Alignment Limits, Regulating Rod Insertion Limits, APSR Insertion Limits, Axial Power Imbalance Limits, Quadrant Power Tilt Limits, and the LCO for Physics Tests.	SR 3.2.5.1 with Note	4.1.d	3
3.2 L12	Adopted STS Surveillance Frequency of 7 days for verification that Quadrant Power Tilt (QPT) is within limits as specified in the COLR. CTS establish a Surveillance Frequency of 2 hours. The change in frequency is based on the relatively slow changing nature of the QPT during steady state operation. During transient conditions, other indications are available to the operator for detection of QPT exceeding the limit and other ITS LCOs direct actions to verify acceptable power distribution within the core.	SR 3.2.4.1	3.5.2.4.4	3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3A L1	Adopted of STS 3.3.4 Condition B providing one hour to take action in lieu of the 30 minutes provided in the CTS and allows unlimited operation with an inoperable Control Rod Drive trip breaker provided appropriate action is taken.	3.3.4 Condition B	3.5.1.6	6
3.3A L2	The CTS requirement for heat balance calibration of nuclear power range instrumentation on a twice-weekly basis is replaced with the STS requirement to perform calibrations at least every 96 hours.	SR 3.3.1.2	Table 4.1-1 Item 3 Remark (1)	3
3.3A L3	The Applicability of the Loss of Main Feedwater and Turbine Trip functions has be revised to $\geq 10\%$ RTP and $\geq 45\%$ RTP respectively, where the CTS requirement for both functions was $> 5\%$ RTP. This change also adopted and revised STS 3.3.1 Conditions F and G accordingly; and the ITS does not require a shutdown to Mode 3.	3.3.1 Conditions F and G, Table 3.3.1-1 Functions 9 and 10	3.5.1.9, Table 3.5.1-1 Notes 15 and 16	2, 4
3.3A L4	Not Used	N/A	N/A	N/A
3.3A L5	Not Used	N/A	N/A	N/A
3.3A L6	Not Used	N/A	N/A	N/A
3.3A L7	The flexibility provided by the Required Actions of STS 3.3.4 is adopted such that no action is required for a specific relay if that relay is operable and all relays in a channel are no longer required to be opened when two or more relays are inoperable.	3.3.4 Required Actions C.1, C.2, and C.3	Table 3.5.1-1 Note 23	4
3.3A L8	Adopted STS 3.3.4 Required Action A.2 which allows removing power from inoperable CRD trip breakers instead of opening the breaker as required by the CTS.	3.3.4 Required Action A.1	Table 3.5.1-1 Note 25	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3A L9	The CTS testing requirements for power range instruments on a monthly basis is retained, but the requirement to perform required tests following each startup if not performed in the previous week is omitted.	SR 3.3.1.3	Table 4.1-1 Item 4	3
3.3A L10	The requirements of STS 3.3.9 and 3.3.10 Applicability are adopted which do not require operability of source range and intermediate range instruments in Mode 1 and does not require a decade of overlap between the instruments as does the CTS.	3.3.9 and 3.3.10 Applicability	Table 3.5.1-1 Note 2	2
3.3A L11	Not Used	N/A	N/A	N/A
3.3A L12	The Note modifying STS 3.3.1.2 is adopted allowing delay of comparison of calorimetric heat balance with power range instruments until $\geq 20\%$ RTP.	SR 3.3.1.2	N/A	3
3.3A L13	The Note modifying STS 3.3.1.2 is adopted allowing delay of comparison of core measured axial power imbalance with the incore measured axial power imbalance until $\geq 20\%$ RTP.	SR 3.3.1.3	N/A	3
3.3A L14	The CTS testing requirements for intermediate range instruments on a monthly basis is retained, but the requirement to perform required tests prior to each startup if not performed in the previous 7 days is omitted.	SR 3.3.10.2	Table 4.1-1 Item 5	3
3.3A L15	The CTS requirement to perform required tests on source range neutron monitors prior to each startup if not performed in the previous week is omitted.	SR 3.3.9.2	Table 4.1-1 Item 6	3
3.3A L16	Incorporated TSTF 286, Revision 2 into STS Condition A of 3.3.9 and 3.3.10 allowing minor plant temperature changes when no source range or intermediate range instrumentation is operable.	3.3.9 and 3.3.10 Condition A Note	N/A	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
B. Engineered Safeguards Actuation System (ESAS), ITS 3.3.5, 3.3.6, and 3.3.7

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3B L1	The ITS applicability of ≥ 1750 psig for Reactor Coolant System Pressure – Low is adopted in lieu of the implied CTS applicability of above Cold Shutdown since the parameter is bypassed and not required to perform a safety function when < 1750 psig..	Table 3.3.5-1 Parameter 1 Applicability, 3.3.5 Note modifying Required Action B.2	Table 3.5.1-1	2
3.3B L2	Adopted ITS 3.3.7 ACTIONS requiring only the digital components, channels, or trains affected by a failure be declared inoperable in lieu of the CTS requirement to consider all of the digital subsystem to be inoperable.	3.3.7 ACTIONS	Table 3.5.1-1 Note 8	4
3.3B L3	STS 3.3.7 Required Action A.1 and its associated Completion Time are adopted allowing inoperable actuation logic channels to be placed in the actuated state in lieu of placing the channel in the tripped or bypass state.	3.3.7 Required Action A.1	Table 3.5.1-1 Note 8	4
3.3B L4	Adopted STS 3.3.6 Required Action A.1 which allows 72 hours for continued operation with an inoperable ESAS manual initiation feature. No similar CTS allowance was provided. This change is consistent with the allowed outage periods for inoperable systems and components actuated by ESAS features.	3.3.6 Required Action A.1	3.0.3	4
3.3B L5	Adopted ITS 3.3.6 and 3.3.7 Applicabilities requiring instrument channel operability when the actuated equipment is required to be operable in lieu of CTS Table 3.5.1-1 Notes 1 and 5 which implied, but did not specifically state a requirement for operability above Cold Shutdown.	3.3.6 and 3.3.7 Applicability	N/A	2
3.3B L6	Not Used	N/A	N/A	N/A
3.3B L7	The shutdown bypass requirement for Reactor Coolant System Pressure-Low analog channels associated with High and Low Pressure Injection is omitted since the bypass function provides no safety function and is not required for channel operability.	3.3.5	Table 4.1-1 Remark (1) for Channels 15.a and 17.a	3

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3C L1	STS 3.3.12 Required Actions A.1 and B.1 which allow 72 hours for continued operation with inoperable Emergency Feedwater Initiation and Control (EFIC) manual initiation features is adopted where no similar CTS allowance was provided. This change is acceptable since the manual initiation of EFIC is not credited in the safety analysis and is consistent with the allowed outage periods for inoperable systems and components actuated by EFIC features.	3.3.12 Required Actions A.1 and B.1	Table 3.5.1-1 Note 1	4
3.3C L2	The ITS Required Actions to reduce thermal power to $\leq 10\%$ for inoperable Loss of Main Feedwater Pumps or Reactor Coolant Pump Status trip actuation logics is adopted in lieu of the CTS requirement to place the unit in Mode 3 since these functions are not required to perform a safety function when $\leq 10\%$ RTP.	3.3.11 Required Action E.1	Table 3.5.1-1 Note 1	4
3.3C L3	Adopted the ITS Completion Time of 1 hour for placing a second inoperable channel in the trip condition where no such Completion Time was provided in the CTS.	3.3.11 Required Action B.2	Table 3.5.1-1 Note 6	6
3.3B L4	Adopted the 72-hour Completion Time to support continued plant operation of Required Action A.1 for ITS 3.3.13 and 3.3.14 where the CTS did not provide for continued plant operation. Since the related inoperabilities only affect one train of EFW, the 72-hour Completion Time is acceptable and consistent with the Completion Time when one EFW train is inoperable.	<ul style="list-style-type: none"> • 3.3.13 Required Action A.1 • 3.3.14 Required Action A.1 	<ul style="list-style-type: none"> • Table 3.5.1-1 Functional Unit 1.f Note 1 • 3.0.3 	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3D L1	Adopted ITS action to restore inoperable Degraded Voltage Monitoring System relays within 1 hour or declare the associated emergency diesel generator (EDG) inoperable which provides an additional 7 days for restoration before unit shutdown is required where the CTS provided 72 hours for restoration prior to unit shutdown.	3.3.8 ACTIONS	Table 3.5.1-1 OTHER Functional Unit 8	6
3.3D L2	Adopted ITS Note that allows a 4-hour delay prior to ACTION entry for performance of the required CHANNEL CALIBRATION.	SR 3.3.8.2 Note	Table 4.1-1 Item 37	4
3.3D L3	Relaxed Applicability for the Borated Water Storage Tank (BWST) Level instrumentation to Modes 1, 2, and 3, omitting the CTS requirement for this instrumentation in a part of Mode 4 (Reactor Coolant System (RCS) pressure > 300 psig.)	3.3.15 Applicability	3.3.1, 3.6.1	2
3.3D L4	Adopted ITS ACTIONS Note to exclude the requirements of LCO 3.0.4 for PAM instrumentation therefore allowing entry into modes of applicability while relying on the ACTIONS of ITS 3.3.15.	3.3.15 ACTIONS Note 1	N/A	2
3.3D L5	Adopted ITS Required Action to submit a Special Report in lieu of the CTS requirement for unit shutdown if one channel of PAM instrumentation for Pressurizer Level, Emergency Feedwater (EFW) flow or Core Exit Thermocouples (CET) is not restored to operable status within 30 days.	3.3.15 Required Action B.1	Table 3.5.1-1 Notes 10 and 22	4
3.3D L6	Adopted ITS restoration period of 30 days for one inoperable Containment High Range Radiation Monitor and 7 days for two inoperable monitors in lieu of the CTS requirement of 7 days for one inoperable monitor and 72 hours for two inoperable monitors.	3.3.15 ACTION A	Table 3.5.1-1 Note 20	6

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3D L7	Adopted ITS Required Action to submit a Special Report in lieu of the CTS requirement for unit shutdown if one channel of PAM instrumentation for Containment Water Level and Containment Pressure – High Range are not restored to operable status within 30 days.	3.3.15 Required Action B.1	Table 3.5.1-1 Note 21	4
3.3D L8	Adopted ITS restoration period of 30 days for one inoperable Reactor Vessel Level Monitor or Hot Leg Measurement channel and 7 days for two inoperable channels in lieu of the CTS requirement of 7 days for one inoperable monitor and 48 hours for two inoperable channels.	3.3.15 ACTIONS A, B, C, G	Table 3.5.1-1 Notes 28 and 29	6
3.3D L9	Adopted ITS Required Action to submit a Special Report in lieu of the CTS requirement for unit shutdown if one hydrogen concentration monitor is not restored to operable status within 30 days, and provides 72 hours before unit shutdown if both channels are inoperable where no provision for two-channel inoperability existed in the CTS.	3.3.15 Required Actions B.1, D.1, F.1, and F.2	3.14.4	4
3.3D L10	Adopted ITS requirement for regular CHANNEL CHECKS of PAM instrumentation only when the instrument is in its normally energized state, a condition not differentiated in the CTS.	SR 3.3.15.1	Table 4.1-1 Items 15a, 17a, 26, 34, 46, 51, 53b, 53c, 57, 58, 59, 61, 63, and 64	3
3.3D L11	Adopted ITS restoration period of 30 days for one inoperable BWST Level channel followed by a Special Report and 7 days for two inoperable channels in lieu of the 7-day CTS requirement for one inoperable channel followed by a shutdown and no CTS provision for two inoperable channels.	3.3.15 Required Actions A.1, B.1, C.1, F.1, and F.2	3.3.6 and 3.3.7	4, 6

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3D L12	Omitted the CTS requirement to perform a CHANNEL FUNCTIONAL TEST of the Containment High Range Radiation Monitors since these channels provide an indication-only function.	N/A	Table 4.1-1 Item 57	3
3.3D L13	Omitted the requirement to test the self-checking feature of the Control Room Area Radiation Monitor channel during the CHANNEL FUNCTIONAL TEST since this feature is not required to verify the monitor can perform its safety function and adopted the 3-hour provision of the ITS SR Note to delay actions for inoperability during performance of the CHANNEL FUNCTIONAL TEST.	SR 3.3.16.2 Note	Table 4.1-1 Item 28.b	3
3.3D L14	Omitted the Special Report requirement of the ITS for inoperable Main Steam Line Radiation monitors since these monitors due not meet Regulatory Guide (RG) 1.97 Type A or Category 1 criteria for PAM functions.	N/A	6.12.5m and Table 3.5.1-1 Note 30	5
3.3D L15	Omitted the following parameter instrumentation from the technical specifications since they provide operational information only and do not meet RG 1.97 Type A or Category 1 criteria: RCS Subcooling Margin, Electromatic Relief Valve (ERV) flow, ERV block valve position, Pressurizer Code Safety valve flow, Pressurizer temperature, Makeup Tank Level, Process and Area Radiation other than Containment High Range, and Emergency Plant Radiation monitors.	SR 3.3.9.2	Table 3.5.1-1 Functional Units 4, 5, 6, 7 and Notes 9, 10, 11, and 12, Table 4.1-1 Items 22, 27, 28a, 28b, 40, 47, 48, 49, and 50	1

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4A L1	Revised CTS 3.1.1.6 to allow an additional 4 hours to reach Mode 5 conditions when a decay heat removal (DHR) loop is inoperable, but omitted the requirement to be in Mode 5 if the remaining operable DHR loop is a reactor coolant system (RCS) loop.	3.4.6 Required Action A.2	3.1.1.6	6
3.4A L2	Omitted the CTS requirement for an RCS loop to have a reactor coolant pump (RCP) available during Mode 5 conditions.	LCO 3.4.7	3.1.1.6.1, 3.1.6.1.2	1
3.4A L3	Adopted ITS provisions allowing one DHR loop to be de-energized for 2 hours in Mode 5 and both DHR loops to be removed from service provided a RCS loop is in operation with the RCS loop filled in preparation for heatup to Mode 4.	LCO 3.4.7 Notes 2 and 3, LCO 3.4.8 Note 2	3.1.1.6	1
3.4A L4	The CTS requirement to maintain core outlet temperature at least 10°F below saturation temperature when DHR loops are removed from service in Mode 5 is omitted from the ITS.	N/A	3.1.1.6 Note *	1
3.4A L5	Adopted ITS provisions to restore parameters within the RCS temperature and pressure limits within 30 minutes or be in Mode 3 in 6 hours in lieu of the CTS requirement to restore parameters within 15 minutes or be in Hot Shutdown within the next 15 minutes.	3.4.3 Required Actions B.1 and C.1	3.1.3.7	6
3.4A L6	Adopted ITS restrictions to place the unit from Mode 3 into Mode 4 if the required RCS loops are not restored in 72 hours where the CTS provided 48 hours for restoration followed by reduction to Mode 5 conditions.	3.4.5 ACTIONS	3.4.2	4, 6
3.4A L7	Adopted ITS provisions to allow both RCS loops to be removed from service in Mode 3 for a limited period of time not allowed in the CTS provided core outlet temperature is maintained at least 10°F below saturation temperature and no operations that could result in a reduction of RCS boron concentration below that needed to meet the required shutdown margin are permitted.	LCO 3.4.5	N/A	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4A L8	Omitted CTS requirement to verify a minimum SG level in Modes 1, 2, 3, and 4 since emergency feedwater operability ensures the SGs will remain available during these modes of operation.	N/A	4.27.3	3
3.4A L9	Not used – see Table R	N/A	N/A	N/A
3.4A L10	Not used – see Table R	N/A	N/A	N/A
3.4A L11	Adopted provisions of TSTF-286, Rev. 2 allowing limited additions of positive reactivity to support operator control of RCS inventory during periods of no forced-flow in the RCS.	LCO 3.4.5 Note a, 3.4.5 Required Action C.1, LCO 3.4.6 Note a, 3.4.6 Required Action B.1, LCO 3.4.7 Note 1a, 3.4.7 Required Action C.1, LCO 3.4.8 Note 1a, and 3.4.8 Required Action B.1	3.1.1.1.B, 3.1.1.5.B, 3.1.1.6.B plus footnote	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4B L1	Adopted ITS provision to perform reactor coolant system (RCS) pressure isolation valve leakage testing if in Mode 5 for 7 days or more where the CTS required this testing anytime Mode 5 is entered, regardless of duration, if not performed in the last 9 months.	SR 3.4.14.1	Table 4.1-2 Note 1	3
3.4B L2	Adopted ITS LCO and Applicability for low temperature overpressure protection (LTOP) which is consistent with the CTS except for the CTS applicability of <600 psig which is omitted in the ITS.	3.4.11 Applicability	3.1.2.9, 3.1.2.10, 3.1.2.11	2
3.4B L3	Adopted ITS Completion Time to Mode 5 of 40 hours in lieu of 34 hours in the CTS in relation to primary-to-secondary leakage limits being exceeded.	3.4.13 Required Action C.2	3.1.6.3.b	6
3.4B L4	Adopted ITS testing frequency for decay heat removal (DHR) isolation valve interlocks of once every 18 months in lieu of the monthly CTS requirement.	SRs 3.4.14.2, 3.4.14.3, 3.4.14.4, and 3.4.14.5	Table 4.1-1 Item 30	3
3.4B L5	Leak rate specifications of CTS Table 3.1.6.9, Footnote (a) related to RCS pressure isolation valves is omitted from the ITS since the overall ITS leak rate limits sufficiently act to ensure continue safe operation if leak rates are maintained within these limits.	N/A	Table 3.1.6.9 Footnote (a)	1
3.4B L6	Adopted ITS restoration period of 1 hour in lieu of the 15-minute CTS allowance and 6 hours to be in Mode 3 in lieu of the 15-minute CTS allowance for conditions exceeding minimum temperature for criticality limits.	3.4.9 Required Actions A.1 and B.1	3.1.3.7	6
3.4B L7	Adopted ITS Applicability for RCS activity limits of Modes 1, 2, and 3 with RCS temperature $\geq 500^{\circ}\text{F}$ in lieu of the CTS "implied" applicability of above Cold Shutdown.	3.4.12 Applicability	3.1.4.1 Table 4.1-3 Note 7	2

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4B L8	Adopted ITS Completion Times for inoperable DHR system isolation valves of 184 hours to Cold Shutdown in lieu of the 84 hours allowed in the CTS which is acceptable since the ITS requires action to isolate the valve within the initial 4 hours of the event, therefore, meeting the isolation function of the valve. A Note is also included to limit these restrictions in Mode 4 when the DHR system is being relied upon for DHR or when transferring from the DHR system operation to RCS loop operation.	3.4.14, 3.5.2, 3.5.3	Table 3.5.1-1 Notes 1 and 5	6
3.4B L9	Adopted ITS frequency for PORV and DHR interlock testing of every 18 months in lieu of the CTS requirement of each or "at the end of" each refueling outage.	<ul style="list-style-type: none"> • SR 3.4.11.5 • SRs 3.4.14.2, 3.4.14.3, 3.4.14.4, and 3.4.14.5 	<ul style="list-style-type: none"> • Table 4.1-2 Item 17 • Table 4.1-2 Item 11 	3
3.4B L10	Not used.	N/A	N/A	N/A
3.4B L11	Omitted CTS frequencies that are modified by elevated RCS activity or other plant conditions and adopted ITS frequencies for RCS sampling of gross, iodine, and E-bar concentrations that are performed at longer intervals than that required by the CTS.	SRs 3.4.12.1, 3.4.12.2, and 3.4.12.3	Table 4.1-3 Items 1.b, 1.c, and 1.g plus Notes (1), (2), (3), and (6)	3
3.4B L12	Adopted ITS frequency for RCS leakage evaluation of every 72 hours instead of the CTS daily requirement and adopted a Note not found in the CTS that allows delaying the evaluation until the plant has been stabilized for at least 12 hours.	SR 3.4.13.1	Table 4.1-2 Item 6a	3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4B L13	Adopted ITS provisions for RCS leak detection requiring a sump and a gaseous or particulate monitor to be operable and 30 days to restore any combination of inoperable equipment to operable status. The CTS required three detectors to be operable, the third being water inventory balance, which is included in the ITS SRs as a normal check of RCS inventory and as a contingency at an increased frequency for use when any required RCS leakage detection component is inoperable. The contingency of grab sampling during component inoperabilities is extended in frequency from shiftily in the CTS to every 24 hours in the ITS. The 30-day restoration period is an extension of the CTS 72-hour period for gaseous or particulate monitor inoperability and a new proposal for sump level inoperability which had no CTS action. The ITS also allows the water inventory balance to be performed in lieu of grab sampling if desired. In addition, an ACTIONS Note is adopted indicating that the provisions of LCO 3.0.4 are not applicable to RCS leakage detection instruments.	3.4.15, SR 3.4.13.1	3.1.6.7	1, 3, 4, 5
3.4B L14	Adopted ITS RCS leak rate limits of 1 gpm unidentified and 10 gpm identified where the CTS allowed 10 gpm total.	LCO 3.4.13	3.1.6.1	1
3.4B L15	Omitted CTS requirement for one pressurizer code safety valve to be operable at the same time LTOP requirements were applicable in order to delete unnecessary overlap of protection.	3.4.10 Applicability	3.1.1.3.B	2
3.4B L16	Adopted ITS Note requiring RCS pressure isolation valve leak testing in Modes 1 and 2 in lieu of the CTS above Cold Shutdown requirement.	SR 3.4.14.1	Table 4.1-2 Note (1), Table 3.1.6.9	2
3.4B L17	Adopted ITS provision to establish a preliminary cold lift setting for pressurizer code safety valves until normal operating temperatures and pressures can be reached to support actual testing and setpoint adjustment.	LCO 3.4.10 Note 2	3.1.1	1

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4B L18	Omitted the CTS requirement to take "immediate action" when RCS activity limits are exceeded and adopted Completion Times of ITS 3.4.12.	3.4.12 ACTIONS Completion Times	3.1.4.1.c	6
3.4B L19	Relocated the 30-gpm CTS limit on returnable RCS leakage via the reactor coolant pump seals to the TRM. This limit is not retained in the ITS.	N/A	3.1.6.8	1

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
(TS Section 3.5 – Emergency Core Cooling Systems (ECCS))

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5 L1	Adopted STS Completion Time of 72 hours for restoration of Core Flood Tank boron concentration to within limits. For this condition, CTS establishes a requirement that a reactor shutdown be initiated and the unit be placed in hot shutdown (equivalent to ITS Mode 3) within 36 hours. Therefore, this change is less restrictive.	3.5.1 ACTION A	3.3.6	6
3.5 L2	Adopted STS Completion Time of 12 hours to place the unit in Mode 3 with RCS pressure ≤ 800 psig for a condition in which a Core Flood Tank is not restored to operable status as required. This action successfully removes the unit from the LCO Applicability. CTS would, for equivalent conditions, require the unit to be placed in cold shutdown within an additional 72 hours.	3.5.1 ACTION C	3.3.6	6
3.5 L3	This change will establish that Core Flood Tank sampling following an inventory addition is not required if the source of the addition is of a known boron concentration. This allowance is consistent with the STS surveillance frequency.	SR 3.5.1.4 Frequency	Table 4.1-3, Item 3	3
3.5 L4	CTS allows maintenance during power operation on any component in the High Pressure Injection or Low Pressure Injection systems provided that not more than one train is removed from service and the maintenance would not cause the train to be inoperable for more than 24 hours. Further, the redundant train is required to be demonstrated operable within 24 hours prior to the maintenance. These CTS requirements are not retained in the ITS. ITS will allow components to be out of service for a longer period of time.	3.5.2 ACTION A 3.5.3 ACTION A	3.3.5	6
3.5 L5	CTS requires verification of the Borated Water Storage Tank (BWST) boron concentration “weekly and after each makeup”. The STS Frequency of 7 days for this verification is adopted. However, the CTS requirement for sampling and analysis of BWST boron concentration after each inventory addition is not retained.	SR 3.5.4.3	Table 4.1-3, Item 2	3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
TS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5 L6	Adopted ECCS – Shutdown Condition in which two Low Pressure Injection (LPI) trains become inoperable. The Required Action is to initiate action to restore one LPI train to operable status immediately. The action does not direct that the unit be placed in Mode 5 unless one train of LPI is restored to operable status. CTS requirements for an equivalent condition would direct that the unit be placed in cold shutdown even if two LPI trains remain inoperable. Therefore, the ITS Required Action is less restrictive.	3.5.3 ACTION C	3.3.6	4
3.5 L7	Adopted STS Completion Times for a condition in which one or more ECCS trains are inoperable and 100% ECCS flow equivalent to a single train is available. The adopted Completion Times allow restoration within 72 hours or require placing the unit in Mode 3 within 6 hours if restoration is not accomplished. These Completion Times are less restrictive than CTS.	3.5.2 ACTION A and B	3.3.6	6
3.5 L8	Adopted STS Required Action to place the unit in Mode 3 with RCS temperature \leq 350°F for a condition in which one or more ECCS trains are not restored to operable status within the allowed completion time. CTS directs that the unit be ultimately placed in cold shutdown (ITS Mode 5) if operability is not restored. Thus, this change is less restrictive since cooldown to Mode 5 would no longer be required.	3.5.2 Required Action B.2	3.3.6	4
3.5 L9	Not used.	N/A	N/A	N/A

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5 L10	Adopted the STS expanded options for administrative control of engineered safety features valve positions.	SR 3.5.1.1 SR 3.5.1.5 SR 3.5.2.1 SR 3.5.2.3	3.3.1(I), 3.3.2(B), 3.3.4(D)	3
3.5 L11	Omitted the CTS actions that apply to the Boric Acid Addition Tank (BAAT) and associated components. This specification duplicates a requirement for an operable boric acid addition source from the Borated Water Storage Tank (BWST). Furthermore, the BAAT and associated flow paths are not assumed to mitigate any design basis accident or transient. This change is consistent with STS.	3.5.4	3.2.1.3	4
3.5 L12	Omitted specific action requirements should Core Flood Tank level and pressure instrumentation become inoperable. ITS requires verification of CFT volume and pressure, however, there are no specific requirements for operability of the level and pressure instrument channels.	SR 3.5.1.2 SR 3.5.1.3	3.3.7(B)	1, 4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L1	Not used.	N/A	N/A	N/A
3.6 L2	Not used.	N/A	N/A	N/A
3.6 L3	The general CTS maintenance requirements applicable to an inoperable Reactor Building (RB) Spray system or RB Cooling system are revised to be consistent with specific STS requirements for an inoperable RB Spray train or RB Cooling train. CTS allows a train of RB Spray or RB Cooling to be made inoperable for up to 24 hours for maintenance, provided the redundant train is demonstrated to be operable prior to initiating maintenance. This CTS requirement for demonstration of the operability of the redundant train is omitted from ITS.	3.6.5	3.3.5	3
3.6 L4	Not used.	N/A	N/A	N/A
3.6 L5	For the Conditions associated with RB Spray and RB Cooling, the Required Action to be in Mode 3 is separated from the Required Action to be in Mode 5 in order to correspond to the STS Applicability. CTS requires the unit to be placed in Mode 5 even though the Applicability for the specifications is Modes 1 and 2; therefore this change is less restrictive.	3.6.5 Conditions D and F	3.3.7(C) 3.3.7(D) 3.3.7(E)	4
3.6 L6	Divided the Required Action to be in Mode 3 from the Required Action to be in Mode 5 in order to correspond to the STS Applicability for the Conditions associated with RB Spray and RB Spray Additive System. CTS requires the unit to be placed in Mode 5 even though the Applicability for the specifications is Modes 1 and 2; therefore this change is less restrictive.	3.6.5 Condition A 3.6.6 Condition A	3.3.4, 3.3.6	4
3.6 L7	Adopted STS Applicability of Modes 1 and 2 for the requirement for two Hydrogen Recombiners to be operable. CTS requires that two Hydrogen Recombiners be operable whenever Reactor Building integrity is required (i.e. ITS Modes 1, 2, 3, 4); therefore this change is less restrictive.	3.6.7 Applicability	3.14.1	2

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L8	Adopted the STS Frequency for verification of the operability of each Hydrogen Recombiner. This change will extend the surveillance frequency from 6 months to 18 months.	SR 3.6.7.1	4.12.1.a	3
3.6 L9	Adopted the STS Frequency for verification that sodium hydroxide concentration is within limits. This change will extend the surveillance frequency from “Quarterly and after each makeup” to 184 days.	SR 3.6.6.3	Table 4.1-3, Item 6	3
3.6 L10	Adopted the STS Frequency for verification that each Reactor Building Spray nozzle is unobstructed. This change will extend the surveillance frequency from five (5) years to ten (10) years.	SR 3.6.5.8	4.5.2.1.1(b)	3
3.6 L11	Adopted the STS Frequency for verification that the Service Water flow rate for each Reactor Building Cooling train is acceptable. This change will extend the surveillance frequency from 14 days to 31 days.	SR 3.6.5.3	4.5.2.1.2(a)	3
3.6 L12	Adopted STS allowance for position verification by administrative means for Reactor Building isolation valves and blind flanges located in high radiation areas. CTS does not provide for alternate position verification.	SR 3.6.3.2, SR 3.6.3.3	3.6	3
3.6 L13	CTS requires two Hydrogen Recombiners to be operable whenever Reactor Building integrity is required (i.e. Modes 1, 2, 3, 4). The CTS direction implies that Mode changes are not allowed with only one Hydrogen Recombiner operable. This change adopts the STS allowance stating that LCO 3.0.4 is not applicable for a condition in which one Hydrogen Recombiner is inoperable. ITS will allow for Mode changes and unit operation during the Completion Time adopted for this condition.	3.6.7 Required Action A.1 Note	3.14	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L14	The CTS requirement to have the Spray Additive System manual valves locked open is deleted.	SR 3.6.6.1	3.3.4(C)	3
3.6 L15	Adopted STS Completion Time of 72 hours for restoration when one Reactor Building Spray train is inoperable or the Spray Additive System is inoperable.	3.6.5 Required Action A.1, 3.6.6 Required Action A.1	3.3.4, 3.3.6, 3.3.7	6
3.6 L16	CTS requirements for Reactor Building penetrations with two valves includes a requirement for testing the “other” valve when one of the penetration isolation valves is inoperable in other than the closed position. This change will omit the requirement for testing the redundant penetration isolation valve and adopt the STS requirement to isolate the penetration.	3.6.3 Required Action A.1	3.6.6	4
3.6 L17	Adopted STS Completion Time to be in Mode 5 (Cold Shutdown) in 36 hours upon a failure to restore or isolate a Reactor Building penetration flow path. CTS provides 24 hours to be in cold shutdown for a similar condition.	3.6.3 Required Action D.2	3.6.6	6
3.6 L18	Modified Reactor Building (RB) isolation valve functional tests to delete reference to “remotely operated” RB isolation valves. There are valves credited as RB isolation valves that are remotely operated (i.e. power operated) that do not receive an RB isolation signal. Therefore, these valves have no isolation time assumed in the accident analysis since they require operator action. ITS will apply the surveillance requirement to “automatic power operated” RB isolation valves. This change is consistent with TSTF-46.	SR 3.6.3.4	4.4.1.4	3
3.6 L19	CTS requires that the engineered safety features valves for the Reactor Building (RB) Spray System, RB Cooling System, and Spray Additive System be operable or locked in the Engineered Safeguards position. This change adopts STS options in addition to locking the valves, for administratively controlling valve positions.	3.6.5, 3.6.6	3.3.1(I), 3.3.4(D)	1, 3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L20	CTS requires that the Reactor Building (RB) manual isolation valves that are required to be closed, be confirmed closed and locked. This change adopts a less restrictive requirement that manual isolation valves located outside and inside the reactor building be verified closed unless locked, sealed, or otherwise secured in position.	SR 3.6.3.2, SR 3.6.3.3	3.6.5	3
3.6 L21	Adopted STS allowances associated with the LCO requiring two Reactor Building air locks to be operable. Specific allowances permit entry and exit to perform repairs, separate Condition entry for each air lock, and entry and exit for 7 days under administrative controls if both air locks are inoperable. CTS does not explicitly provide these allowances.	3.6.2 Action Notes 1 and 2, 3.6.2 Condition A Note 2	3.6.1	4
3.6 L22	Adopted STS Condition, Required Actions, and Completion Times (as modified by TSTF-30, Rev. 3) applicable to penetration flow paths with one Reactor Building (RB) isolation valve in a closed system. Adoption of this condition effectively extends the Completion Time from 1 hour to 72 hours.	3.6.3 Condition C	3.6.1	6
3.6 L23	Adopted STS allowance to explicitly credit an actual actuation signal (in addition to a simulated actuation signal) for verification of proper actuation of the Reactor Building Spray System and Reactor Building Emergency Cooling System.	SR 3.6.5.5 SR 3.6.5.6 SR 3.6.5.7	4.5.2.1.1.a, 4.5.2.1.2.c.1	3
3.6 L24	Omitted STS Surveillance Requirement to perform leak rate testing for Reactor Building (RB) Purge valves with resilient seals. A 1998 ANO-1 design change replaced all the RB Purge Valves containing resilient seals with valves that have multi-layer metallic wafer seats.	3.6.3	4.26.2	3
3.6 A16	Adopted SRTS SR provision exempting automatic valves that are locked, sealed, or otherwise deactivated in their required position from being tested functionally, consistent with the requirements of CTS 1.7.d and 4.0.3 and GDCs 55 and 56.	SR 3.6.3.5	1.7.d, 4.0.3, Table 4.1-2 Item 8	3

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L1	Adopted ITS allowance for the number of main steam isolation valves (MSIV) required to be operable and for continued plant operation provided power and the nuclear overpower high trip setpoints are reduced to levels which ensure adequate pressure relief capability remains operable in lieu of the CTS 24 hour restoration period followed by a plant shutdown. This CTS change also incorporates the ITS allowance for separate condition entry for each inoperable MSSV.	LCO 3.7.1 Note, 3.7.1 ACTIONS Note, and Table 3.7.1-1	3.4.1.2, 3.4.2	1, 4
3.7 L2	Adopted ITS allowance to perform MSSV testing in Mode 3 during plant heatup in lieu of the CTS requirement to bench test during refueling mode or testing during a plant cooldown.	SR 3.7.1.1 Note	Table 4.1-2 Item 4	3
3.7 L3	Adopted ITS requirement to place the unit in a non-applicable mode instead of the CTS Cold Shutdown requirement for inoperable MSSVs, main steam isolation valves (MSIV), and main feedwater isolation valves (MFIV).	3.7.1, 3.7.2, 3.7.3, and 3.7.6 ACTIONS	3.4.2	4
3.7 L4	Adopted ITS provision not found in the CTS to continue operation in Mode 3 if the inoperable MSIV, MFIV, main feedwater block valve, low load feedwater control valve or startup feedwater control valve is closed and periodically verified to be closed.	3.7.2 ACTION C, 3.7.3 ACTIONS A, B, C, and D	3.4.2	4
3.7 L5	Omitted the CTS quarterly exercise of the MSIVs and MFIVs since partial stroke testing of these valves increase the risk of valve closure and subsequent loss of power generation.	N/A	Table 4.1-2 Items 13.a and 14.b	3
3.7 L6	Not used.	N/A	N/A	N/A
3.7 L7	Adopted the 7-day restoration period of the ITS for an inoperable condensate storage tank (CST) where the CTS provided no restoration period prior to shutdown. In addition, the unit is required to be placed in a condition in Mode 4 where the SGs are not relied upon for decay heat removal instead of the CTS requirement of	3.7.6 ACTIONS	3.4.2	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	Mode 5.			
3.7 L8	Omitted the CTS requirement to shutdown to Cold Shutdown when both emergency feedwater (EFW) pumps are inoperable if the auxiliary feedwater (AFW) pump is available since a loss of the AFW pump would result in a loss of all feedwater if plant conditions were below the point in which main feedwater could be used.	N/A	3.4.4.4. 3.4.4.5	4
3.7 L9	Adopted the ITS EFW pump SR frequency of quarterly in lieu of the CTS monthly requirement to be consistent with ASME Section XI, NUREG 1366, Section 9.1, and NUREG 1430 as modified by TSTF 101.	SR 3.7.5.2	4.8.1.a.1, 4.8.1.a.2	3
3.7 L10	Omitted CTS requirements for automatic actuation capability of EFW system components in Mode 4 since events that occur while in this plant condition afford ample opportunity for actions to be taken to mitigate the event without reliance on automatic functions. In addition, omitted the CTS requirement for EFW pump testing prior to criticality in favor of the ITS requirement to test within 24 hours of exceeding a SG pressure of 750 psig.	SR 3.7.5.2, 3.7.5.3, and 3.7.5.4 applicable Notes	4.8.1.a.1	3
3.7 L11	Omitted redundant reporting requirements for radioactive source leakage covered under 10 CFR Part 30, 40 and 70 and not required in the ITS.	N/A	3.12.2, 6.12.5.e	5
3.7 L12	Adopted the ITS requirement to verify the manual valve positions in the EFW flow path prior to entering Mode 2 in lieu of the CTS requirement of prior to relying on the SGs as a decay heat removal source since no appreciable change in decay heat load is developed until the reactor is taken critical (Mode 2).	SR 3.7.5.5	4.8.1.c	3
3.7 L13	Omitted the CTS requirement to verify redundant component operability prior to beginning maintenance on a service water (SW) train and extended the restoration period for an inoperable SW train from 36 to 72 hours as is consistent with the STS.	3.7.7 ACTIONS	3.3.5, 3.3.6	4

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L14	Reduced the CTS operation times for the penetration room ventilation system (PRVS) from 1 hour to 15 minutes and deleted the fuel handling area ventilation system (FHAVS) operation time since these systems do not contain heaters. The FHAVS will be in service anytime fuel handling activities are occurring in the fuel handling area.	SR 3.7.11.1, SR 3.7.12.1	4.11.5, 4.17.4	3
3.7 L15	Adopted the STS Applicability for spent fuel pool (SFP) boron concentration of whenever fuel assemblies are stored in the pool in lieu of the CTS requirement of "at all times."	3.7.14 Applicability	3.8.17	2
3.7 L16	Adopted ITS allowance to credit automatic actuation of the control room emergency ventilation system (CREVS) due to actual or simulated test signals in lieu of the CTS requirement of on a high radiation signal for meeting surveillance requirements.	SR 3.7.9.3	4.10.2.d.2	3
3.7 L17	Adopted the ITS applicability of Modes 1, 2, 3, and 4 for the PRVS which does not include the CTS requirements for refueling or when the reactor coolant system is open to the atmosphere.	3.7.11 Applicability	3.13.1	2
3.7 L18	Not used.	N/A	N/A	N/A
3.7 L19	Adopted the STS provisions not found in the CTS for verifying automatic SW valves to be operable by verifying the valves are "sealed or otherwise secured" in their required position	SR 3.7.7.2	3.3.1(I), 3.3.4(D)	3
3.7 L20	Revised the CTS CREVS requirements to allow the control room boundary to be breached for up to 24 hours which would have resulted in entry into LCO 3.0.3 if no such allowance was provided. This allowance is consistent with NUREG 1430 as modified by TSTF 287, Rev. 5.	LCO 3.7.9 Note and 3.7.9 ACTION B	3.9.2	1

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L21	Revised the CTS PRVS requirements to allow the room boundaries to be breached for up to 24 hours which would have resulted in entry into LCO 3.0.3 if no such allowance was provided. This allowance is consistent with NUREG 1430 as modified by TSTF 287, Rev. 5.	LCO 3.7.11 Note and 3.7.11 ACTION B	3.13	1
3.7 L22	Revised the CTS to allow the steam-driven EFW pump to be inoperable for up to 7 days in Mode 3 provided the unit has not entered Mode 2 conditions following refueling due to the absence of decay heat load in this condition.	3.7.5 Condition A Note and second condition	3.4.4.2	4
3.7 L23				

CHANGE CATEGORIES

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| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L1	Adopted ITS Completion Times (24, 12, and 4 hours dependant on what AC Source is inoperable) for redundant equipment verification where CTS 3.0.5 implied a prompt or immediate verification of equipment status. Although the CTS 3.0.5 6-hour action to Hot Standby is omitted, the time to Hot Shutdown (Mode 3) remains the same in the CTS. In addition, the ITS methodology of applying the actions associated with affected equipment is adopted where the CTS would have required a shutdown upon loss of function.	3.8.1 Required Actions A.2, B.2, and C.1	3.0.5, 3.7.2.C	4, 6
3.8 L2	Adopted ITS restoration periods for Emergency Diesel Generator (EDG) auxiliary equipment such as fuel oil day tank level that may be applied prior to declaring the associated EDG inoperable.	3.8.3 ACTIONS A, B, C, and D	3.7.1.C.2	4
3.8 L3	Adopted ITS provisions not found in the CTS for more than one AC Source inoperability at the same time and for handling Distribution Systems independently of AC Sources. In addition, where the CTS required verification testing of EDGs for any AC electrical component inoperability, the ITS provision is adopted that requires this verification only if the failure mode is of the EDG proper and is determined to not affect the remaining EDG.	3.8.1 ACTIONS C, D, and E	3.7.2.A, 3.7.2.C, 3.7.2.D	4
3.8 L4	Adopted ITS Completion Times of 72 hours in lieu of the CTS 24-hour allowance for single offsite circuit inoperability and 12 hours to Mode 3 thereafter in lieu of the CTS 6-hour allowance to be in Hot Shutdown.	3.8.1 Required Actions A.3 and F.1	3.7.2.B, Table 3.5.1-1 Note 14	6
3.8 L5	Adopted ITS ACTIONS Note allowing separate entry condition relevant to inoperable DC Sources not provided for in the CTS.	3.8.6 ACTIONS Note	N/A	4
3.8 L6	Not used.	N/A	N/A	N/A

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L7	Since the capability for extended operation is demonstrated by ITS SR 3.8.1.3, the 5-minute test of ITS SR 3.8.1.8 and SR 3.8.1.9 is adopted for post loss of offsite power testing of EDGs in lieu of the CTS 1-hour test requirement.	SR 3.8.1.8 and SR 3.8.1.9	4.6.1.2.d	3
3.8 L8	Omitted CTS requirement for EDG testing which simulates interruption of offsite power and subsequent EDG connection to the affected electrical bus since this test is redundant to loss of offsite power testing required to be performed every 18 months in the ITS and is not an activity assumed in the safety analysis beyond the initial loss of offsite power.	N/A	4.6.1.2.c	3
3.8 L9	Omitted the CTS requirement for EDG starting air compressor operability since it is the stored pressurized air volume in the receiver tank that is required to support EDG operability and not the ability of the compressor to recharge the tank.	N/A	3.7.1.C.4, 4.6.1.4.a	1, 3
3.8 L10	Not used.	N/A	N/A	N/A
3.8 L11	Adopted ITS allowance to test EDG support equipment separately from actual EDG testing.	<ul style="list-style-type: none"> • SR 3.8.3.3 • SR 3.8.1.4 • SR 3.8.3.1 • SR 3.8.3.2 	<ul style="list-style-type: none"> • 4.6.1.4.a • 4.6.1.4.c • 4.6.1.4.d • 4.6.1.4.e 	3
3.8 L12	Adopted ITS operability for AC Distribution systems which treats the AC buses as a separate component, regardless of whether power from an offsite circuit, as required in the CTS, or from an EDG.	3.8.9	3.7.1.B	1
3.8 L13	Not used.	N/A	N/A	N/A

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L14	Adopted ITS test frequency consistent with Regulatory Guide 1.108 of 18 months for EDG protective relaying starting interlocks and circuitry CHANNEL CHECKS and channel tests which were required every month and once per quarter, respectively, in the CTS.	SR 3.8.1.8, SR 3.8.1.9	Table 4.1-1 Item 32	3
3.8 L15	Adopted ITS provision of 24 hours to restore at least one offsite circuit to operable status when Startup Transformer #1 is inoperable and the load-shed feature of Startup Transformer #2 (SU2) is simultaneously inoperable where the CTS would have required entry into 3.0.3.	3.8.1 Required Action C.2	3.7.2.H	4
3.8 L16	Adopted ITS allowance for testing of the SU2 load-shed feature in Modes 3, 4, 5, and 6 and certain portions of the testing to be performed in Modes 1 and 2 where the CTS only allowed this testing to be performed in refueling shutdown (Mode 6).	SR 3.8.1.7 Note	Table 4.1-1 Item 33	3
3.8 L17	Adopted the ITS provision of declaring all equipment inoperable affected by an inoperable AC Distribution bus and applying the applicable actions, where the CTS would have required a plant shutdown in all cases where such redundant functions were known to be inoperable.	LCO 3.0.6	3.7.2.D, 3.7.3.A.2	4

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9 L1	Adopted STS LCO requiring only those penetrations providing direct access from the reactor building to the outside atmosphere to be operable or closed in lieu of the CTS requirement that applied to all reactor building penetrations.	LCO 3.9.3.c	3.8.7	1
3.9 L2	Adopted the STS boron sampling frequency of every 72 hours in lieu of the CTS requirement of 3 times per week which, if taken at equal intervals, would equate to sampling every 56 hours.	SR 3.9.1.1	Table 4.1-3 Item 1.f	3
3.9 L3	Adopted ITS frequency for reactor building purge isolation system operability verification of 18 months in lieu of the CTS requirement of within 7 days prior to refueling operations.	SR 3.9.3.2	3.8.10	3
3.9 L4	Adopted the ITS requirements and ACTIONS upon loss of SDM in Mode 6 to terminate activities that could result in a release to the environment (core alterations, for example) and restore shutdown margin, in lieu of the CTS requirement to establish reactor building integrity.	3.9.1	3.6.2	1, 4
3.9 L5	Adopted ITS Required Action to only prohibit the loading of irradiated fuel assemblies into the reactor vessel when the required decay heat removal systems are not operational in lieu of the CTS requirement prohibiting loading of all fuel assemblies, irradiated and non-irradiated.	3.9.4 Required Action A.2	3.8.9	4
3.9 L6	Adopted STS allowance as modified by TSTF 349, Rev. 1 not found in the CTS to secure all decay heat removal pumps for up to 15 minutes to support switching from one train to another when reactor coolant water level is less than 23 feet above the fuel seated in the reactor vessel.	LCO 3.9.5 Note 1	3.8.3.b	1

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9 L7	Adopted STS allowance not found in the CTS for one decay heat removal pump to be inoperable for up to 2 hours when reactor coolant water level is less than 23 feet above the fuel seated in the reactor vessel provided the redundant train is operable and in operation in order to support surveillance testing of decay heat removal components.	LCO 3.9.5 Note 2	3.8.3.b	1
3.9 L8	Adopted STS allowance as modified by TSTF 286, Rev. 2 supporting adjustments to reactor coolant inventory and temperature when required source range monitors or decay heat removal loops are not operable provided such changes will not result in a reduction of shutdown margin below required limits.	3.9.2 Required Action A.2, LCO 3.9.4 Note, 3.9.4 Required Action A.1, and 3.9.5 Required Action B.1.	3.1.1.1.B, 3.8.3.a plus Note *, 3.8.3.b, and 3.8.9	1, 4

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
4.0 none	N/A	N/A	N/A	N/A

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L1	Not used.	N/A	N/A	N/A
5.0 L2	Adopted the STS allowance for implementation of alternatives to the control or alarm device requirements for high radiation areas of 10 CFR 20.	5.7.1	6.11.1	3
5.0 L3a	The CTS is revised to change the submittal date for the Occupational Exposure Data Report to April 30 of each calendar year and the Annual Occupational Exposure Report from March 1 to April 30 of each calendar year.	5.6.1	6.12.2.2	5
5.0 L3b	Omitted CTS reporting requirements for pressurizer electromatic relief and safety valve challenges.	N/A	6.12.2.4	5
5.0 L4	Adopted ITS allowance of performing all applicable actions associated with the loss of both trains of redundant equipment in lieu of the CTS requirement that would require a shutdown upon loss of a safety function, regardless of other TS action requirements for that function.	5.5.15	3.7.3.A.1 and 3.7.3.B	4
5.0 L5	Not used.	N/A	N/A	N/A
5.0 L6	Adopted the ITS requirement to test fuel oil for particulates only which replaces the testing in accordance with ASTM-D975 and relaxes the CTS requirement to perform sampling activities in conjunction with the monthly test of the emergency diesel generator.	5.5.13	4.6.1.4.e	3

CHANGE CATEGORIES

- | | |
|---|---|
| 1. Relaxation of LCO Requirement | 4. Relaxation of Required Actions |
| 2. Relaxation of Applicability | 5. Relaxation of CTS Reporting Requirements |
| 3. Relaxation of Surveillance Requirement | 6. Relaxation of Completion Time |

Table LA –Removal Of Details
ITS Section 1.0 – Use and Application

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
1.0 none	N/A.	N/A	N/A	N/A	N/A

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 2.0 – Safety Limits

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
2.0 LA1	Procedural details for meeting fuel pin centerline temperature and departure from nucleate boiling ratio limits.	2.1.1, 2.1.2	2.1.1 and 2.1.2 Bases	3	Bases Control Program Described in ITS 5.5.13
2.0 LA1	Procedural details for performance of reactor coolant system leak testing.	4.3.2	2.1.1 and 2.1.2 Bases	3	Bases Control Program Described in ITS 5.5.13

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA – Removal of Details
ITS Section 3.0 – Limiting Condition for Operation (LCO) and Surveillance Requirement (SR) Applicability

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.0 none	N/A	N/A	N/A	N/A	N/A

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.1 LA1	Procedure requirement for extrapolation of measured Moderator Temperature Coefficient (MTC) values.	3.1.7.2	SR 3.1.3.1 Bases	3	Bases Control Program Described in ITS 5.5.14
3.1 LA1	Related specification limiting the concentration of dissolved gases in the reactor coolant. The presence of dissolved gases in the reactor coolant beyond limits will not affect the safety function of the control rods to insert into the core.	3.1.9.1, 3.1.9.2, 3.1.9.3, Figure 3.1.9-1, Table 4.1-3, Item 1.d Table 4.1-3 Note (7)	TRM	4	10CFR50.59
3.1 LA1	System design details for APSRs on loss of power.	4.7.1.1	SAR – Section 7.2.2.2.1	1	10CFR50.59
3.1 LA1	Procedural instruction not to include the position of a misaligned control rod in the calculation of the average position of the associated group.	4.7.1.2	B 3.1.4 LCO Bases	3	Bases Control Program Described in ITS 5.5.14
3.1 LA1	Procedural reference to position indicating instrumentation used for determining Control Rod position.	4.7.1.3	B 3.1.7 Background - Bases	3	Bases Control Program Described in ITS 5.5.14
3.1 none	RCS boron concentration sampling and analysis frequency requirement.	Table 4.1-3, Item 1.f	TRM	4	10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.1 none	Control Rod Program Verification (Group vs Core Positions)	CTS 4.7.2	FSAR	3	10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.2 LA1	25% Quadrant Power Tilt Limit value.	3.5.2.4.3	COLR	3	10 CFR 50.59
3.2 LA1	Operating control rod group overlap value of 20% \pm 5.	3.5.2.5.2	COLR	3	10 CFR 50.59
3.2 LA1	Related requirement for the control rod drive patch panels to be locked at all times.	3.5.2.7	SAR	4	10 CFR 50.59
3.2 LA1	Related requirement for 23 individual incore detectors to be operable.	3.5.4 Specification	TRM	4	SAR Controlled by 10 CFR 50.59
3.2 LA1	Procedural details concerning the configuration of incore detectors for measuring Axial Imbalance.	3.5.4.1	Bases	3	Bases Control Program described in ITS 5.5.14
3.2 LA1	Procedural details concerning the configuration of incore detectors for measuring Radial Tilt.	3.5.4.2	Bases	3	Bases Control Program described in ITS 5.5.14
3.2 LA1	Instrument surveillance requirements for Incore Neutron Detectors	Table 4.1-1, Item 39	TRM	4	SAR Controlled by 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.3A LA1	Procedural details of performance of the required Heat Balance Calibration.	1.5.6	SR 3.3.1.2 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3A LA1	System design details for Reactor Protection System (RPS) setpoint requirements.	2.3.1, Table 2.3-1 Notes (a), (b), (c), and (d)	3.3.1 Bases	1	Bases Control Program Described in ITS 5.5.14
3.3A LA1	Procedural requirements that provide for bypassing only one RPS channel at a time.	3.5.1.3	3.3.1 Bases Background	3	Bases Control Program Described in ITS 5.5.14
3.3A LA1	Procedural details supporting nuclear instrument overlap expectations.	3.5.1.5	SR 3.3.1.1, 3.3.9.1, and 3.3.10.1 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3A LA1	System design details of the number of RPS channels installed and how many channels must actuate to result in a reactor shutdown.	Table 3.5.1-1 Columns 1 and 2	3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10 Bases	1	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
A. Reactor Protection System (RPS), ITS 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, and 3.3.10

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.3A LA1	System design details relevant to the operation of intermediate and source range instruments.	Table 3.5.1-1 Note 7	3.3.9 and 3.3.10 Bases	1, 2	Bases Control Program Described in ITS 5.5.14
3.3A LA1	Procedural details relevant to the Group 8 Regulating (control rod) power supply.	Table 3.5.1-1 Note 23	3.3.4 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3A LA1	System operational detail relevant to the function of the Control Rod Drive DC power source.	Table 3.5.1-1 Note 26	3.3.4 Bases	2	Bases Control Program Described in ITS 5.5.14
3.3A LA1	Procedural details for performance of Control Rod Drive Trip Breaker testing.	Table 4.1-1 Item 2 Remark (1)	SR 3.3.4.1 Bases	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
B. Engineered Safeguards Actuation System (ESAS), ITS 3.3.5, 3.3.6, and 3.3.7

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.3B LA1	System design details of the number of Engineered Safeguards Actuation System (ESAS) channels installed and how many channels must actuate to result in a reactor shutdown.	Table 3.5.1-1 Columns 1 and 2	3.3.5 Bases	1	Bases Control Program Described in ITS 5.5.14
3.3B LA1	System design details for ESAS actuated systems and components.	3.5.3 Action Column	3.3.5 Bases	1	Bases Control Program Described in ITS 5.5.14
3.3B LA2	Procedural requirements for testing of the Reactor Building Spray System Logic Channels.	Table 4.1-1 Channel 20 Remark (1)	3.3.7 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3B none open	Sodium hydroxide tank level instrumentation requirements intended to support the containment safety function.	4.1.a, Table 4.1-1 Channel 38, Table 4.1-1 Note	TRM	3	10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements, and Indication-Only Instrumentation Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
C. Emergency Feedwater Initiation and Control (EFIC), ITS 3.3.11, 3.3.12, 3.3.13, and 3.3.14

DOC No.	Description of Removed Information	CTS Reerence	New Location	Change Type	Change Control Process
3.3C LA1	Procedural requirements that provide for bypassing only one Emergency Feedwater Initiation and Control (EFIC) channel at a time.	3.5.1.11	3.3.11 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3C LA1	System design details of the number of EFIC channels installed and how many channels must actuate to result in a reactor shutdown.	Table 3.5.1-1 Columns 1 and 2	3.3.11 Bases	1	Bases Control Program Described in ITS 5.5.14
3.3C LA1	Procedural requirements that discuss when it is permissible to bypass Loss of Reactor Coolant Pump and Low Steam Generator Pressure Trips.	Table 3.5.1-1 Notes 15 and 19	3.3.11 Bases Background	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.3D LA1	Instrument design for Containment High Range Radiation Monitors.	3.5.1.12	3.3.15 Bases	1	Bases Control Program Described in ITS 5.5.14
3.3D LA1	System design details for Engineered Safeguards Actuation System (ESAS), Emergency Feedwater Initiation and Control (EFIC), and Other Safety Related instrumentation concerning the number of channels installed and how many channels must actuate to result in a reactor shutdown or actuation.	Table 3.5.1-1 Columns 1 and 2 for parameters: <ul style="list-style-type: none"> • ESAS 1a and 2a • EFIC 1b and 1c • OTHER 2 and 3 • OTHER 8a with Note * • OTHER 10, 11, and 12 • OTHER 13 • OTHER 14 • OTHER 15 and 16 	<ul style="list-style-type: none"> • 3.3.15 Bases • 3.3.15 Bases • 3.3.15 Bases • 3.3.8 Bases • 3.3.15 Bases • 3.3.15 Bases • 3.3.16 Bases • 3.3.15 Bases 	1	Bases Control Program Described in ITS 5.5.14
3.3D LA1	Conditions for bypassing of the Degraded Voltage Monitoring function.	Table 3.5.1-1, Note 13	3.3.8 Bases	4	Bases Control Program Described in ITS 5.5.14
3.3D LA1	Procedural details concerning the contents of a Special Report.	Table 3.5.1-1, Notes 20, 28.b, 28.b	3.3.15 Bases	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.3 – Instrumentation
D. Miscellaneous, ITS 3.3.8, 3.3.15, and 3.3.16

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.3D LA1	Procedural details relevant to the containment hydrogen concentration instruments CHANNEL CALIBRATION.	4.12.2	SR 3.3.15.2 Bases	3	Bases Control Program Described in ITS 5.5.14
3.3D LA1	Related or redundant administrative reporting requirements associated with the Containment Radiation., Reactor Vessel Level, and Hot Leg Level Measurement instrumentation.	6.12.5.b, k, and l	3.3.15 Bases	2	Bases Control Program Described in ITS 5.5.14
3.3D LA2	Not used	N/A	N/A	N/A	N/A
3.3D LA2	Not used	N/A	N/A	N/A	N/A

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.4A LA1	System descriptions relating to Reactor Coolant Pump (RCP) nominal operating power.	Table 2.3-1 Column 2 and 3 Headings	3.4.4 Bases	1	Bases Control Program Described in ITS 5.5.14
3.4A LA1	Redundant requirement for steam generator (SG) operability.	3.1.1.2.A	3.4.4 and 3.4.5 Bases	4	Bases Control Program Described in ITS 5.5.14
3.4A LA1	Procedural details relating to what constitutes reactor coolant system (RCS) loop operability.	3.1.1.5.A, 3.1.1.6	3.4.5, 3.4.6, and 3.4.7 Bases	3	Bases Control Program Described in ITS 5.5.14
3.4A LA1	Procedural details relating to evaluations required of RCS fracture toughness.	3.1.2.6	3.4.3 Bases	3	Bases Control Program Described in ITS 5.5.14
3.4A LA1	Procedural details relating to updating RCS pressure-temperature curves after reaching 31 EFPY.	3.1.2.7, 3.1.2.8	3.4.3 Bases	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.4 – Reactor Coolant System
A. Reactor Coolant System, ITS 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, and 3.4.8

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.4A LA1	Redundant requirement for decay heat removal capability.	3.4.1.1	3.4.4 and 3.4.5 Bases	4	Bases Control Program Described in ITS 5.5.14
3.4A LA2	Not used	N/A	N/A	N/A	N/A
3.4A LA2	Not used	N/A	N/A	N/A	N/A
3.4A LA3	Not used	N/A	N/A	N/A	N/A

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.4B LA1	Procedural details relating to testing methods for pressurizer code safety valves.	2.2.2	Bases for SR 3.4.10.a	3	Bases Control Program Described in ITS 5.5.14
3.4B LA1	Procedural details relating to core flood tank (CFT) and high pressure injection (HPI) valve configurations.	3.1.2.9. 3.1.2.10	3.4.11 Bases	3	Bases Control Program Described in ITS 5.5.14
3.4B LA1	Procedural details relating to the measurement of reactor coolant system (RCS) activity.	3.1.4.1.a	3.4.16 Bases	3	Bases Control Program Described in ITS 5.5.14
3.4B LA1	Procedural details relating to measurement units for steam generator (SG) tube leakage.	3.1.6.3.b	3.4.13 Bases	3	Bases Control Program Described in ITS 5.5.14
3.4B LA1	Procedural details relating to leak measurement methods for RCS pressure isolation valves.	Table 3.1.6.9 Heading, Column 1, and Footnote (c)	Bases for SR 3.4.14.1	3	Bases Control Program Described in ITS 5.5.14
3.4B LA1	Procedural details relating to the measurement of reactor coolant system (RCS) activity.	Table 4.1-3 Notes (1), (2), and (4)	Bases for SR 3.4.12.1 and 3.4.12.3	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.4 – Reactor Coolant System
B. Auxiliaries, ITS 3.4.9, 3.4.10, 3.4.11, 3.4.12, 3.4.13, 3.4.14, and 3.4.15

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.4B LA2	Related evaluations associated with the impact of detectable RCS leakage.	3.1.6.2, 3.1.6.5, 3.1.6.8	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA2	Related requirement for decay heat removal (DHR) system relief valve settings.	3.5.1.7	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA2	Related requirements associated with RCS pressure instrumentation and CFT isolation valve interlocks.	Table 3.5.1-1 OTHER Functional Units 1.a and 1.b, Table 4.1-1 Item 30	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA2	Related requirements associated with Low Temperature Overpressure Protection (LTOP).	Table 4.1-1 Item 60	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA2	Related surveillance requirement associated with pressurizer heater power availability.	Table 4.1-2 Item 7	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA2	Procedural details relating to RCS pressure isolation valve integrity verification.	Table 4.1-2 Note (2)	TRM	3	SAR Controlled By 10 CFR 50.59
3.4B LA2	Related sampling requirements associated with RCS activity.	Table 4.1-3 Item 1.a and Note (7)	TRM	4	SAR Controlled By 10 CFR 50.59
3.4B LA3	Related testing frequency requirements for pressurizer code safety valves and RCS pressure isolation valves.	Table 4.1-2 Item 3 and Note (1)	IST	4	IST Program Controlled By 10 CFR 50.54a and 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.5 LA1	Borated Water Storage Tank information that provides details of tank design that are not directly pertinent to the actual requirement.	3.3.1(G)	3.5.4 Bases	1	Bases Control Program Described in ITS 5.5.14
3.5 LA1	Procedural details associated with reactor building emergency sump isolation valves to the Low Pressure Injection system.	3.3.1(H)	3.5.2 Bases, LCO	3	Bases Control Program Described in ITS 5.5.14
3.5 LA2	Not used.	N/A	N/A	N/A	N/A
3.5 LA3	Procedural details associated with the Makeup and Chemical Addition System.	3.2.1	TRM	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	System design details associated with the Makeup and Chemical Addition System.	3.2.1.1	TRM	1	SAR Controlled By 10 CFR 50.59
3.5 LA3	System design details associated with the Makeup and Chemical Addition System.	3.2.1.2	TRM	1	SAR Controlled By 10 CFR 50.59
3.5 LA3	System design details associated with the Makeup and Chemical Addition System.	Figure 3.2-1	TRM	1	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details concerning the manual valve on the discharge line from the Borated Water Storage Tank.	3.3.1(G)	SAR, Section 6.1.5.4.6	3	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS, Reporting Requirements, and Indication-only Instrumentation Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
 ETS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.5 LA3	System design details associated with the High Pressure Injection Pumps' power supplies.	3.3.2(A)	SAR, Section 6.1.2.5	1	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details concerning the Core Flood Tank discharge valves.	3.3.3(C)	SAR, Section 6.1.2.1.3	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Number of instrumentation channels required to be operable for the Core Flood Tank level and pressure instrumentation.	3.3.3(D)	TRM	3, 4	SAR Controlled By 10 CFR 50.59
3.5 LA3	Surveillance requirements associated with Core Flood Tank level and pressure instrumentation.	Table 4.1-1, Item 25	TRM	3, 4	SAR Controlled By 10 CFR 50.59
3.5 LA3	Surveillance requirements associated with the Boric Acid Addition Tank Level and Temperature instrumentation.	Table 4.1-1, Item 36	TRM	3, 4	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details associated with High Pressure Injection System surveillance requirements.	4.5.1.1.1(a)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details supporting surveillance requirements for the High Pressure Injection System.	4.5.1.1.1(b)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details associated with Low Pressure Injection System surveillance requirements.	4.5.1.1.2(a) & (a)(1)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details supporting surveillance requirements for the Low Pressure Injection System.	4.5.1.1.2(b)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS, Reporting Requirements, and Indication-only Instrumentation Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
[TS Section 3.5 – Emergency Core Cooling Systems (ECCS)]

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.5 LA3	Procedural details associated with Core Flooding System surveillance requirements.	4.5.1.1.3	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details associated with surveillance requirements for High Pressure and Low Pressure Injection Pumps.	4.5.1.2.1	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details associated with surveillance requirements for engineered safety feature valves in the emergency core cooling systems.	4.5.1.2.2(a)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59
3.5 LA3	Procedural details associated with surveillance requirements for engineered safety feature valves in the emergency core cooling systems.	4.5.1.2.2(b)	SAR, Table 6-5	3	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS, Reporting Requirements, and Indication-only Instrumentation Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.6 LA1 open	Procedural details concerning operability and surveillance testing requirements for reactor building penetrations.	1.7	3.6.1, 3.6.2, and 3.6.3 Bases	3	Bases Control Program Described in ITS 5.5.14
3.6 LA1	Procedural details concerning operability requirements for reactor building spray pumps and reactor building coolers.	3.3.4(A), 3.3.4(D)	3.6.5 and 3.6.6 Bases	3	Bases Control Program Described in ITS 5.5.14
3.6 LA1	Procedural details concerning operability requirements for reactor building hydrogen recombiners.	3.14.1	3.6.7 Bases	3	Bases Control Program Described in ITS 5.5.14
3.6 LA1	Procedural details concerning operability and testing requirements for reactor building purge isolation valves.	3.23.1, 4.26.1	3.6.3 Bases	3	Bases Control Program Described in ITS 5.5.14
3.6 LA1 open	Procedural details concerning testing requirements and methods for reactor building spray pumps and reactor building coolers.	4.5.2	3.6.5 SR Bases	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.6 LA1	Procedural details concerning testing requirements for reactor building hydrogen recombiners.	4.12.1	3.6.7 SR Bases	3	Bases Control Program Described in ITS 5.5.14
3.6 LA2	Related requirement associated with the reactor building hydrogen recombiners to verify the instrumentation and circuitry portions of the system.	4.12.1.b.1	TRM	4	SAR Controlled By 10 CFR 50.59
3.6 LA3	Related requirements associated with the reactor building spray and cooling system testing intervals.	4.5.2.2.1, 4.5.2.2.2	Inservice Test Program (IST)	4	IST Program Described in ITS 5.5.8

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.7 – Plant Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.7 LA1	System design details concerning the redundancy and separation requirements for operable service water (SW) loops.	3.3.1.C	3.7.7 Bases	1	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details concerning the setup necessary to support main steam safety valve (MSSV) testing.	3.4.1.2 Note *	3.7.1 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details concerning precautions to be taken to ensure fuel assemblies are not inadvertently stored in incorrect configurations.	3.8.16	3.7.15 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details concerning the safe placement of a fuel assembly prior to suspending fuel movement in accordance with the technical specifications (TS).	3.15.2	3.7.12 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details regarding the override capability associated with the emergency feedwater (EFW) valves.	4.8.1.e.5	SR 3.7.5.3 Bases	3	Bases Control Program Described in ITS 5.5.14

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.7 – Plant Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.7 LA1	Procedural details concerning scheduling of the control room emergency air conditioning system (CREACS) monthly testing.	4.10.1a	SR 3.7.10.1 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details concerning scheduling and performance criteria of control room emergency ventilation system (CREVS) testing.	4.10.2.a, 4.10.2.d.2	SR 3.7.9.1 and SR 3.7.9.3 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	Procedural details associated with verification and testing criteria of the emergency cooling pond (ECP).	4.13.1.2, 4.13.1.3, 4.13.1.4	3.7.8 Bases	3	Bases Control Program Described in ITS 5.5.14
3.7 LA1	System design details and reference associated with the penetration room ventilation system (PRVS).	5.2.3	3.7.11 Bases	1	Bases Control Program Described in ITS 5.5.14
3.7 LA2	Procedural details concerning the testing frequencies for the MSSVs, main steam isolation valves (MSIV), and main feedwater isolation valves (MFIV).	Table 4.1-2 Items 4, 13.b, and 14.b	Inservice Test Program (IST)	3	IST Program Described in ITS 5.5.8
3.7 LA2	Procedural details concerning the testing of automatically actuated service water valves that support required emergency systems.	4.5.1.2.2, 4.5.2.2.2	Inservice Test Program (IST)	3	IST Program Described in ITS 5.5.8

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.7 – Plant Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.7 LA2	Procedural details concerning the testing criteria of the EFW pumps and valves.	4.8.1.a, 4.8.1.d	Inservice Test Program (IST)	3	IST Program Described in ITS 5.5.8
3.7 LA3	System design detail regarding spent fuel pool (SFP) loading arrangements.	Figure 3.8.1, 3.8.16	SAR	1	SAR Controlled By 10 CFR 50.59
3.7 LA3	Procedural detail regarding spent fuel pool (SFP) boron sampling following inventory additions or preceding fuel movement.	Table 4.1-3 Item 4 plus Note (9)	TRM	3	SAR Controlled By 10 CFR 50.59
3.7 LA3	Procedural detail regarding performance indicators of low pressure injection and reactor building cooling system testing.	4.5.1.1.2(b), 4.5.2.1.2(c)(3)	TRM	3	SAR Controlled By 10 CFR 50.59
3.7 LA3	Procedural detail associated with performance testing of the PRVS.	4.11.5	TRM	3	SAR Controlled By 10 CFR 50.59
3.7 LA4	Requirements regarding the detection and control of leakage from byproduct, source, or special nuclear material which do not meet the 10 CFR 50.36 criteria for inclusion in the TSs.	3.12, 3.12.1, 4.14	TRM	4	SAR Controlled By 10 CFR 50.59
3.7 none	Minimum sampling and analysis frequencies associated with secondary system radioiodine concentration.	Table 4.1-3 Item 5.a, and Notes 5, 7, and 10	TRM	4	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.7 – Plant Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.7 none	Augmented Inservice Inspection Program for High Energy Lines Outside of Containment There are six welds in the main steam and main feedwater lines located outside of the reactor building where protection from the consequences of postulated ruptures is not provided by a system of pipe whip restraints, jet impingement barriers, protective enclosures and/or other measures designed specifically to cope with such ruptures. These welds receive an augmented inspection that enhances the integrity of the pipe and reduces the probability of catastrophic failure. The inspection is performed in accordance with ASME Section XI and is a sequential volumetric inspection. Repairs, reexaminations and piping pressure tests, as required, are also performed in accordance with ASME Section XI.	4.15	Inservice Inspection Program	4	10 CFR 50.55a

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.8 LA1	Procedural details concerning the components necessary and the testing methods for AC Source operability	3.7.1.A, 3.7.1.G, Table 4.1-1 Items 32 and 33, 4.6.1.1	3.8.1 Bases	3	Bases Control Program Described in ITS 5.5.14
3.8 LA2	Procedural details concerning the unavailability of Emergency Diesel Generators (EDG).	3.7.2.C	Maintenance Program	3	Maintenance Program In Accordance With 10 CFR 50.65
3.8 LA3	Related requirements or information supporting EDG and degraded voltage protective relaying.	Table 4.1-1 Item 33, 4.6.1.1, 4.6.1.3	TRM	4	SAR Controlled By 10 CFR 50.59
3.8 LA4	Related requirement concerning the capacity of an EDG fuel oil transfer pump.	4.6.1.5	Inservice Testing Program	4	IST Program Described in ITS 5.5.8
3.8 LA5	Related requirement to alternate battery chargers with the spare charger each quarter.	4.6.2.4	TRM	4	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
3.9 LA1	Procedural details regarding the reduction of reactor coolant boron during low reactor coolant flow conditions.	3.1.1.1.B	3.9.4 and 3.9.5 Bases	3	Bases Control Program Described in ITS 5.5.14
3.9 LA1	Related details of performance requirements associated with neutron flux indicators.	3.8.2	TRM	4	SAR Controlled By 10 CFR 50.59
3.9 LA1	Procedural details concerning administrative controls necessary for open containment penetrations during refueling operations.	3.8.6 Note *	3.9.3 Bases	3	Bases Control Program Described in ITS 5.5.14
3.9 LA2	Time since the reactor became subcritical during which the offloading of irradiated fuel from the reactor core to the spent fuel pool is not permitted. This explicit restriction is not needed in the ITS because the time to perform the necessary activities prior to commencing movement of irradiated fuel from the core is greater than the specified time limits.	3.8.11	TRM	1	SAR Controlled By 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 4.0 – Design Features

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
4.0 LA1	Design details regarding the site location, the general site information, the reactor building, the reactor building isolation system, the penetration room ventilation system, applicable references, the reactor vessel, information relevant to fuel enrichment, control rod construction, the reactor coolant system, new fuel storage racks, and the spent fuel storage racks.	5.1, 5.2.1, 5.2.2, 5.2.3, 5.3.1.2, 5.3.1.3, 5.3.1.4, 5.3.1.5, 5.3.2.1, 5.3.2.2, 5.4.1.1, and 5.4.2.2	SAR	1	10 CFR 50.59
4.0 LA1	Procedural details regarding the design, evaluation and enrichment of reload fuel.	5.3.1.6	TRM	3	SAR Controlled By 10 CFR 50.59
4.0 LA1	Design details associated with the reactor coolant system volume.	5.3.2.3	TRM	1	SAR Controlled By 10 CFR 50.59
4.0 LA1	Procedural details concerning administrative controlling empty spaces in the new fuel storage area.	5.4.1.1	TRM	3	SAR Controlled By 10 CFR 50.59
4.0 LA1	Procedural details concerning the storage of new fuel.	5.4.1.2	SAR	3	10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
5.0 LA1	Plant specific management position titles are replaced with generic titles provided in ANSI/ANS 3.1 (ITS 5.5.1) and the detail regarding the requirements for personnel filling these positions are controlled under ITS 5.3 and the QAPM.	Section 6.0 (general)	5.3 and Quality Assurance Program Manual (QAPM)	4	Unit Staff Qualifications Described in ITS 5.3.1 and the QAPM Controlled by 10 CFR 50.54a
5.0 LA2	Requirement associated with the third non-licensed operator maintained on-shift for other reasons than those required in the technical specifications.	Table 6.2-1	SAR	4	10 CFR 50.59
5.0 LA3	Procedural details associated with the testing of the penetration room, fuel handling area, and control room emergency ventilation filters.	3.13.1.e, 3.15.1.e, 4.10.2, 4.11.1, 4.11.2, 4.11.4, 4.17.1, 4.17.2, and 4.17.3	Ventilation Filter Testing Program (VFTP)	3	VFTP Described in ITS 5.5.11
5.0 LA3	Procedural details associated with the sampling of emergency diesel fuel oil.	4.6.1.4.e	Diesel Fuel Oil Testing Program (DFOTP)	3	DFOTP Described in ITS 5.5.13
5.0 LA4	Not used	N/A	N/A	N/A	N/A
5.0 LA5	Procedural details associated with the control of explosive gas and radioactive gas content of on-site storage tanks.	3.24, 3.25, 4.28, 4.29, Figure 3.24-1	Offsite Dose Calculation Manual (ODCM) and Radioactive Effluent Controls Program (RECP)	3	ODCM Described in ITS 5.5.1 and RECP Described in ITS 5.5.4
5.0 LA6	Requirements associated with the main feedwater line flow limiting annulus.	Table 4.1-2 Item 12	TRM	4	SAR Controlled by 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table LA –Removal Of Details
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Removed Information	CTS Reference	New Location	Change Type	Change Control Process
5.0 LA6	Requirements regarding reactor vessel inspections.	4.2.4	SAR	4	10 CFR 50.59
5.0 LA6	Record retention requirements regarding reactor vessel inspections.	4.2.5	Quality Assurance Program Manual (QAPM)	4	10 CFR 50.54a
5.0 LA6	Requirements associated with startup reports.	6.12.2.1	TRM	4	SAR Controlled by 10 CFR 50.59

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System Operation
3. Procedural Details for Meeting TS and Reporting Requirements
4. Related or Redundant Specification/Surveillance Requirement/Administrative Controls Requirement

Table R –Relocated Specifications

Safety Evaluation Paragraph	CTS Reference	Description of Relocated Specification	New Location	Change Control Process
3.0.E.1	3.1.1.4, Table 4.1-2 Item 15	Requirements for the reactor vessel internals vent valves. (Originally addressed in DOC 3.4A - LA3.)	TRM	10 CFR 50.59
3.0.E.2	3.1.1.7, Table 4.1-2 Item 16	Requirements for the three RCS vent paths. (Originally addressed in DOC 3.4A - LA2 and L9)	TRM	10 CFR 50.59
3.0.E.3	3.1.2.4, 3.1.2.6	Steam Generator pressure/temperature limit prohibiting secondary side pressure from being raised above 200 psig when shell temperature is below 100°F as an aid in protecting against non-ductile failure.	TRM	10 CFR 50.59
3.0.E.4	3.1.2.5, 3.1.2.6	Pressurizer heatup and cooldown limits intended to prevent non-ductile failure and assure compatibility of operation with the fatigue analysis.	TRM	10 CFR 50.59
3.0.E.5	3.1.5, Table 4.1-3 Item 1.e and Note (8)	Requirements for RCS chemistry. (Originally addressed in DOC 3.4A - LA2 and L10)	TRM	10 CFR 50.59
3.0.E.6	3.5.1.14, 3.5.1.1, Table 3.5.1-1 Functional Unit 17 and Note 30, and Table 4.1-1 Item 28c	(1) Radiological release monitoring function of the Main Steam Line Monitors; (2) post accident monitoring function of the Main Steam Line Monitors. (Originally addressed in DOC 3.3D - LA2)	(1) ODCM (2) SAR	(1) 5.5.1 (2) 10 CFR 50.59
3.0.E.7	3.5.1.4	Operational restrictions on the use of the Shutdown Bypass key switch for power/imbalance/flow, power/pump, low reactor coolant pressure, and pressure/temperature trips during power operations.	TRM	10 CFR 50.59
3.0.E.8	3.8.1	Requirements for radiation monitors and alarms associated with fuel handling areas used to alert personnel of unexpected conditions during fuel handling activities.	TRM	10 CFR 50.59
3.0.E.9	3.8.5	Requirements for fuel handling personnel to be in direct communication with the control room that aids in ensuring prompt notification of changes in plant or core conditions.	TRM	10 CFR 50.59

Table R –Relocated Specifications

Safety Evaluation Paragraph	CTS Reference	Description of Relocated Specification	New Location	Change Control Process
3.0.E.10	3.8.8, 3.8.9	Minimum separation requirements between the fuel handling bridges intended to prevent fuel damage during fuel shuffle.	TRM	10 CFR 50.59
3.0.E.11	3.8.12	Restrictions associated with the handling of irradiated fuel when the ANO vicinity is under a tornado watch.	TRM	10 CFR 50.59
3.0.E.12 open	3.8.13	Requirements supporting the movement of spent fuel (dry) shipping casks.	TRM	10 CFR 50.59
3.0.E.13	3.8.14	Restrictions prohibiting the transport of loads in excess of 2000 pounds above the fuel in the spent fuel pool as an aid to preclude possible fuel damage in the event of an unanticipated load drop.	TRM	10 CFR 50.59
3.0.E.14	3.16, 4.16, Table 4.16-1	Requirements associated with safety-related system piping snubbers or shock suppressors.	TRM	10 CFR 50.59
3.0.E.15	3.22, 4.25	Requirements associated with the reactor building purge filtration system no longer required to meet 10 CFR 100 limits in the event of a fuel handling accident.	TRM	10 CFR 50.59
3.0.E.16	4.1.b, Table 4.1-2 Item 5	Minimum equipment test frequencies associated with the refueling system interlocks.	TRM	10 CFR 50.59
3.0.E.17	4.1.b, Table 4.1-2 Item 10	Minimum equipment test frequencies associated with the spent fuel cooling system.	TRM	10 CFR 50.59
3.0.E.18	4.6.3	Requirements associated with emergency lighting in safety-related areas.	TRM	10 CFR 50.59