

ATTACHMENT 4

to

1CAN080101

ANO COMMENTS

on

DRAFT SAFETY EVALUATION (SE)

ANO Comments on Draft Safety Evaluation (SE)

On July 17, 2001 Arkansas Nuclear One – Unit 1 (ANO-1) received a copy of the NRC draft Safety Evaluation (SE) regarding the planned future approval of the ANO-1 conversion to the Improved Technical Specifications (ITS) based on NUREG-1430, Revision 1. The purpose of forwarding the draft SE to Entergy Operations was to provide ANO-1 personnel an opportunity to review and validate the content of the document. The draft SE has been reviewed as requested by the NRC with minor revisions being noted. The ANO-1 comments are presented in table format, starting on the following page.

Entergy Operations is pleased with the initial accuracy and care illustrated by the NRC Staff in preparation of the draft SE. If further discussion in regard to the following comments is required, please do not hesitate to contact a member of the ANO Licensing staff.

Location of Comment within draft SE	Comment
Section 1.0, Introduction	The 2nd bulleted item after the 1st paragraph references generic improvements relevant to NUREG 1431. This should have referenced NUREG 1430 instead.
Table 1, Amendment 204	The correct amendment date for Amendment 204 is February 18, 2000.
Table 1, Amendment 206	The description of the amendment implies that the EDG must be tested only if "a common cause failure does not exist." In truth, the EDG must be tested only if a common cause failure DOES exist. One possible method of phrase repair would be to replace the phrase "only if" with the word "unless." This will allow the last part of the sentence to read "to once within 24 hours unless it is determined that (a) common cause failure does not exist, (b) it is currently in operations, (c) it has been demonstrated operable within the previous 24 hours."
Table 1	<p>Please add the following TS change:</p> <p>Renewed 6/20/01 License Renewal. Approved an additional 20 years of operation for Operating License the ANO-1 nuclear facility.</p>
Table 1	<p>It is presently unclear if the amendment regarding changes to TSs related to the Q-CST will be approved prior to ITS approval. However, it is very likely that this amendment will be approved. Therefore, please consider adding the following to Table 1:</p> <p>214 8/xx/01 Revised CTS 3.4.1 and associated bases to include volume requirements for the Q-CST when aligned either to ANO-1 or when aligned to both ANO-1 and ANO-2.</p>
Paragraph located between Table 1 and Table 2, 5th sentence	This sentence references an ANO supplemental letter that made revisions to ITS Section 5.0. Although not received by the NRC, further revisions will be made to this section in ANOs planned supplemental which the Staff should receive in August of 2000. This comment is offered as a place-holder for the NRC Staff should they desire to include reference to the future August 2000 supplement that will make revisions to ITS Section 5.0.
Relocated TS #2, RCS Vents, 3rd to the last sentence	The phrase "not-safety" should read "non-safety".

Location of Comment within draft SE	Comment
Relocated TS #4, Pressurizer Heatup and Cooldown Limits, 2nd and 3rd to the last sentence	The word "initial" in the 3rd to the last sentence and the word "spray" in the 2nd to the last sentence are misspelled.
Relocated TS #6, Main Steam Line Radiation Monitoring System, 2nd sentence	The phrase "not-safety" should read "non-safety".
Relocated TS #7, Shutdown Bypass Key Switch, Function 8	The title used for Function 8 following the 1st paragraph unnecessarily capitalizes "AXIAL POWER IMBALANCE."
Relocated TS #12, Spent Fuel Shipping Casks	<p>A revised discussion is included below, but will be considered as an L-Type change and removed from the "relocated" section of the SE. See Section 3.9 DOC L9.</p> <p>"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, the CTS conditions for movement of loaded spent fuel shipping casks are based on the type and amount of spent fuel being transported. The CTS requirements are unique and considered historical in nature, because any future shipment will likely deviate in both fuel type and amount. Although cask drop events that may result during the handling of cask shipments are considered in the fuel handling accident (FHA) analysis (SAR Section 9.6.2), future shipments will require re-evaluation for the type and amount of fuel involved and will likely require prior-NRC approval in accordance with 10 CFR 50.59. Even if the current analysis indicated that the assumed future shipment was acceptable without further re-analysis, prior-NRC approval remains required in accordance with 10 CFR Part 71. Because the CTS requirements are historical in nature and adequate control is afforded by other regulations as described above, these restrictions are proposed for deletion from the technical specifications."</p>

Location of Comment within draft SE	Comment
Relocated TS #17, Spent Fuel Cooling System, 3rd to last sentence	The word "Neither" at the beginning of the 3rd to the last sentence is misspelled.
Paragraph following the last Relocated TS discussion (#18), last sentence	The last sentence of this paragraph has an extra word... "and" ... please delete.
Beginning of Section G, 2nd paragraph, last sentence	The word "deviation" should be "difference."
Section G, Item #6, ECCS-Operating, 1st and 3rd sentence	In the first sentence just prior to the phrase "or equal to 350°F," the word "less" should be followed by the word "than." In the 3rd sentence, the degree symbol is missing from the phrase "350 F."
List of Acronyms	Please consider removing the following acronyms from the list that are not commonly used at ANO-1: EPA FSBEHAVS

ATTACHMENT 5

to

1CAN080101

Revised

SAFETY EVALUATION (SE) Tables

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: RATED THERMAL POWER, CORE ALTERATION, OPERABLE-OPERABILITY, CHANNEL CHECK, CHANNEL CALIBRATION, QUADRANT POWER TILT, AXIAL POWER IMBALANCE, DOSE EQUIVALENT I-131, CORE OPERATING LIMITS REPORT, E-AVERAGE DISINTEGRATION ENERGY, and Pressure Boundary LEAKAGE	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 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

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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 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 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

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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 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 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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1 A1	Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS Section 3.1, Reactivity Control Systems. * Specification relocated to the Technical Requirements Manual (TRM).	<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 1/ • 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	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. * Specification relocated to the Technical Requirements Manual (TRM).	<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 L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type Category
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 Category
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

CHANGE CATEGORIES

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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type Category
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
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

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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 LA2	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 <u>LA3</u>	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 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 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 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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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% ±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 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 ≤ 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 ≤ 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 ≤ 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 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 <i>(continued)</i>	<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	<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>	<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 an 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 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
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

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 3.3 – 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 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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
|---|--|

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 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
3.3A M15	Adopted STS 3.3.4 Applicability and ACTIONS 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

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 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 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 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

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 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 LA3 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 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 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	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Emergency Feedwater Initiation and Control (EFIC) Instrumentation. * 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.	<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 <ul style="list-style-type: none"> • 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 \geq 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 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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|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
|---|--|

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 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 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	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). * 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.	<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 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

- | | |
|---|---|
| 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

- | | |
|---|---|
| 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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
|---|--|

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 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 \geq 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 style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Wide Range Neutron Flux</td> <td style="width: 33%;">RCS Hot Leg Temperature</td> <td style="width: 33%;"></td> </tr> <tr> <td>Condensate Storage Tank Level</td> <td>Steam Generator (SG) A and B Water Level – High</td> <td></td> </tr> <tr> <td>Reactor Building Spray Flow</td> <td>Automatic Reactor Building Isolation Valve Position</td> <td></td> </tr> <tr> <td>High and Low Pressure Injection Flow</td> <td></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 style="width: 100%; border: none;"> <tr> <td style="width: 33%;">RCS Pressure</td> <td style="width: 33%;">SG A and B Water Level – Low Range</td> <td style="width: 33%;">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 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. Not used.	3.7.6 N/A	3.4.1.3 N/A

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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 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	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Reactor Coolant Systems (Auxiliaries). * Deleted by previous Amendment to CTS.	<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°F to ≤ 262°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 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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 inoperabilites is extended in frequency from shiftly 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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5 A1	Incorporated wording preference, editorial, numbering, structure and STS formatting convention changes to CTS requirements for Emergency Core Cooling Systems (ECCS). * Deleted by previous TS Amendment	<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 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 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 \leq 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

- | | |
|---|---|
| 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 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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
|---|--|

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
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 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
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 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 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 12-7 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 A – Administrative Changes
ITS Section 3.6 – Reactor Building Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6 A1	Incorporated wording preference, editorial, numbering, structure, and STS formatting convention changes to CTS requirements for Reactor Building Systems. * 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.	<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. Not used.	<u>N/A</u>	<u>N/A</u>
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 isolation 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 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

- | | |
|---|---|
| 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
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

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 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

- | | |
|---|---|
| 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 L25	<u>Adopted STS provision which allows opening, under administrative controls, automatic valves that have been deactivated closed.</u>	<u>3.6.3 ACTIONS Note 1</u>	<u>1.7.c.3.6.6</u>	<u>4</u>
3.6 L2A16	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

- | | |
|---|---|
| 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 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 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
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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
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
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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
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 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. Not used.	3.7.1, 3.7.2, 3.7.3, 3.7.5, 3.7.6 N/A	3.4 (CTS page 40) N/A
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 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 Mode 5.	3.7.6 ACTIONS	3.4.2	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 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
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

- | | |
|---|---|
| 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

- | | |
|---|---|
| 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

- | | |
|---|---|
| 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 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 <u>SAR</u>	3	SAR Controlled By 10 CFR 50.59
<u>3.7 LA3</u>	<u>Procedural detail regarding performance indicators of reactor building cooling and spray system testing.</u>	<u>4.5.2.1.2(c)(3)</u>	<u>TRM</u>	<u>3</u>	<u>SAR Controlled By 10 CFR 50.59</u>
3.7 LA3	Procedural detail associated with performance testing of the PRVS.	4.11.5	TRM <u>SAR</u>	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 <u>LA5</u>	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 <u>LA6</u>	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 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 specify a total of 14 MSSVs without regard to 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 24-12 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 A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8 A1	Incorporated wording preferences, convention adoption, editorial, numbering, structure and formatting changes associated with ITS section 3.8, Electrical Power Systems. * 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.	<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 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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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 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 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 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

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| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
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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
3.9 L9	<u>Proposed deletion of historical restrictions placed on the shipment of spent fuel casks to offsite facilities. Because future shipments will require evaluation based on the type and amount of fuel to be shipped and because prior NRC approval is required in accordance with 10 CFR Part 71, deletion of these historical requirements is acceptable.</u>	<u>N/A</u>	<u>3.8.13</u>	<u>1</u>

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 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 <u>3.9.2 Bases</u>	4	<u>Bases Control Program Described in ITS 5.5.14</u> 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 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 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	<u>Although no bases exist for ITS Sections 4.0 and 5.0, several CTS markup pages containing material relevant to these sections contain bases statements. These statements are identified with reference to DOC A2 and are deleted in favor of the associated STS Bases and incorporated into the appropriate ITS Bases sections. Applicable technical content within the CTS Base is retained in the appropriate ITS Bases sections. Not used.</u>	<u>See 3.9 A2 row in ITS Section 3.9 Administrative Table (ITS does not provide Bases for Section 4.0, Design Features)</u> N/A	<u>3.8 Bases</u> 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 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

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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 |

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L – 4.0

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 SAR	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 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 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	<p>Although no bases exist for ITS Sections 4.0 and 5.0, several CTS markup pages containing material relevant to these sections contain bases statements. These statements are identified with reference to DOC A2 and are deleted in favor of the associated STS Bases and incorporated into the appropriate ITS Bases sections. Applicable technical content within the CTS Base is retained in the appropriate ITS Bases sections. 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.</p>	<ul style="list-style-type: none"> • <u>Section 4.0 SR Bases</u> • <u>3.7.11 Bases</u> • <u>3.7.12 Bases</u> • <u>5.5.12</u> • <u>SR Bases for 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.9, 3.3.10</u> • <u>2.0 Bases</u> • <u>3.7.9 and 3.7.10 Bases</u> • <u>5.5.9</u> • <u>3.6.3</u> • <u>5.5.2</u> • <u>5.5.3</u> • <u>5.5.10</u> 	<ul style="list-style-type: none"> • <u>4.0.1 through 4.0.5 Bases</u> • <u>3.13 Bases</u> • <u>3.15 and 4.17 Bases</u> • <u>3.24, 3.25, 4.28, 4.29 Bases</u> • <u>4.1 Bases</u> • <u>4.2 and 4.3 Bases</u> • <u>4.10 Bases</u> • <u>4.18 Bases</u> • <u>4.26 Bases</u> • <u>Operating License (OL) 2.C.(5)</u> • <u>OL 2.C.(6)</u> • <u>OL 2.C.(7)</u>
5.0 A3	<p>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.</p>	<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	<p>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.</p>	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
<u>5.0 A18</u>	<u>Not used.</u>	<u>N/A</u>	<u>N/A</u>
<u>5.0 A19</u>	<u>Not used.</u>	<u>N/A</u>	<u>N/A</u>
<u>5.0 A20</u>	<u>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</u>	<ul style="list-style-type: none"> • <u>5.5.2</u> • <u>5.5.3</u> • <u>5.5.10</u> 	<ul style="list-style-type: none"> • <u>Operating License (OL) 2.C.(5)</u> • <u>OL 2.C.(6)</u> • <u>OL 2.C.(7)</u>

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
	<u>existing license conditions. As such, this change in presentation of existing requirements is purely administrative.</u>		

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

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Relaxation of LCO Requirement 2. Relaxation of Applicability 3. Relaxation of Surveillance Requirement | <ul style="list-style-type: none"> 4. Relaxation of Required Actions 5. Relaxation of CTS Reporting Requirements 6. Relaxation of Completion Time |
|---|--|

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	<u>Requirements regarding the monitoring of iodine in vital areas (except containment). Not used.</u>	<u>Operating License Item (6)N/A</u>	<u>N/ASAR</u>	<u>N/A4</u>	<u>N/A10 CFR 50.59</u>
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 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 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