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December 14, 2001
JAFP-01-0260

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59

Comments on Draft Safety Evaluation regarding Proposed Conversion to Improved Technical Specifications for the James A. FitzPatrick Nuclear Power Plant

Reference:

1. NRC letter, Guy S. Vissing (NRC) to Michael Kansler (ENO), Draft Safety Evaluation Regarding Proposed Conversion to Improved Standard Technical Specifications – James A. FitzPatrick Nuclear Power Plant, dated November 7, 2001 (TAC No. MA5049)

Dear Sir,

Entergy Nuclear Operations, Inc. (ENO) was requested to review the draft safety evaluation (SE) of the proposed conversion to the Improved Technical Specifications for the James A. FitzPatrick Nuclear Power Plant (Reference 1) and provide comments to the U.S. Nuclear Regulatory Commission (NRC). The letter requested these comments be provided within 30 days of receipt of Reference 1. However, based on a subsequent phone conversation with the NRC staff, the SE tables included in the Reference 1 submittal were not reviewed. The NRC staff provided revised SE tables via electronic communication, and these are the SE tables ENO reviewed and provided comments on. The ENO comments are provided in the Attachment.

In addition, Reference 1 also requested that a certified copy of the ITS and Bases, as well as license conditions concerning relocated requirements and new/revised Surveillance Requirements be submitted within 30 days of receipt of Reference 1. Based on subsequent phone conversations with the NRC staff, these items will be submitted at a later date.

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Should you have any questions, please contact Mr. Andy Halliday at (315) 349-6055.

Very Truly Yours,

T.A. Sullivan
Vice President, Operations – JAF

Attachment as stated

STATE OF NEW YORK
COUNTY OF OSWEGO
Subscribed and sworn to before me
This 14 day of Dec., 2001.

NOTARY PUBLIC

BONNIE S. BOSTIAN # 4857051
Notary Public, State of New York
Oswego County
My Commission Expires June 30, 2002

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. XX TO FACILITY OPERATING LICENSE NO. DPR-59

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-333

1.0 INTRODUCTION

The James A. FitzPatrick Nuclear Power Plant (JAFNPP) has been operating with Technical Specifications (TS) issued with the full power operating license (DPR-59) on October 17, 1974, as amended. By application dated March 31, 1999, as supplemented by letters dated May 20, June 01, July 14, and October 14, 1999, February 11, April 04, April 13, June 30, July 31, September 12, September 13, and October 23, 2000, the Power Authority of the State of New York (PASNY), the former licensee, proposed to convert the current TS to improved TS. On November 21, 2000, PASNY's ownership interest in FitzPatrick was transferred to Entergy Nuclear FitzPatrick, LLC, to possess and use FitzPatrick and to Entergy Nuclear Operations, Inc. (ENO) to possess, use and operate FitzPatrick. By letter dated January 26, 2001, ENO requested that the NRC continue to review and act on all requests before the Commission which had been submitted by PASNY before the transfer. Accordingly, the staff continued its review of PASNY's responses concerning the issue of the conversion of the current TSs for the JAFNPP to a set of improved TSs. Supplements to the application by ENO were submitted by letters dated February 20, May 31, August 6, and October 18, 2001. The conversion to the improved TS is based upon:

this is a UFSAR update letter

Letters do not exist or do not apply to ITS

- NUREG-1433, "Standard Technical Specifications for General Electric Plants, BWR/4," Revision 1, dated April 1995,
- NUREG-1434, "Standard Technical Specifications for General Electric Plants,
- Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and
- 10 CFR 50.36, "Technical Specifications," as amended July 19, 1995 (60 FR 36953).
- The current FitzPatrick TS.

BWR/6," Revision 1, dated April 1995,

Hereinafter, the proposed improved TS for FitzPatrick (or JAFNPP) are referred to as the ITS, the current TS are referred to as the CTS, and the improved standard TS, such as in NUREG-1433 are referred to as the STS. The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1.

or NUREG-1434,

Enclosure 1

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, regulatory requirements, and operating practices, were discussed with the licensee during a pre-submittal meeting on April 14, 1999. Several post-submittal letters of request for additional information (RAI) and a series of follow-up telephone conference calls that were required during course of the review. Information discussed with the licensee during follow-up phone calls has been incorporated in the staff RAIs and licensee's supplemental submittals. These plant-specific changes clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as proposed changes to STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific application in the ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents, such as the updated final safety analysis report (UFSAR) for JAFNPP. Changes to documents by the licensee are controlled by regulation such as 10 CFR 50.59 and may be changed without prior NRC approval. NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

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

Since the licensee prepared the March 31, 1999, application, a number of amendments to the JAFNPP operating license were approved. Table 1 provides the subjects of the amendments and the dates of issuance.

252 | Revise Section 6.0 | 4/12/99

TABLE 1

Amendment No.	Description of Change	Date
253	Extend AOT for EDGs from 7 to 14 days	07/30/99
254	Revise Section 6.0 and Appendix B	09/13/99
255	Revisions to actions to be taken in event multiple control rods are inoperable	09/21/99
256	Correct maximum exposure dependent and provide additional storage racks to increase spent fuel capacity	11/10/99
257	Revise calibration requirements for LPRM	11/22/99
258	Pressure and Temperature Limits	11/29/99
259	Extend the AOT time for RHR Service water System	01/28/00

Amendment No.	Description of Change	Date
260	Delete Section 4.7.D.1.e to eliminate requirement for partial stroking the plant MSIVs	02/24/00
261	Changes SBGT filter efficiency	04/14/00
262	Preclude Applicability of TSs 3.0.D and 4.0.D	09/29/00
263	Trip Level Setting for RHR, CS, and ADS Pumps Start Timers	10/04/00
264	Revise reactor water level set point for ATWS, Recirculation pump trip, and alternate rod insertion functions	10/10/00
265	Revise MSIV closure scamp trip level setting	10/10/00
266	Minimum Critical Power Ratio Safety Limit	10/30/00
267	Leakage and Hydrostatic Testing Condition	11/03/00
268	Transfer of License to Entergy Nuclear Operations, Inc	11/~~00~~/00 21
269	Revise TS Surveillance testing Requirements of the Charcoal adsordors to meet GL-99-02	02/05/01
270	Relocate "Offgas Treatment System Explosive Gas Mixxing Instrumentation" to Administrative Section 6 of the TS	04/18/01
271	One time change of out of service time allowance for the residual heat removal system service water system	07/27/01
272	One time change to out-of-service time for one incoming reserve AC power line inoperable from 7 days to 14 days commencing September 9, 2001	09/15/01

this is date of Amendment

ENO has incorporated these amendments, as appropriate, into the ITS by supplemental submittal letters dated May 31, August 6, and October 18, 2001.

The NRC staff's evaluation of the licensee's application dated March 31, 1999 (JNP-99-008), as supplemented by letters dated ~~May 20,~~ June 01, July 14, and October 14, 1999, February 11, April 04, April 13, June 30, July 31, September 12, September 13, and October 23, 2000, ~~February 20,~~ May 31, ~~August 6,~~ and October 18, 2001 is presented in this SE. The NRC staff issued requests for additional information (RAIs) dated ~~November~~ December 10, 1999, February 9, 2000, and June 14, 2000.

Two license conditions for implementing the conversion will make enforceable the following aspects of the conversion: (1) ~~for~~ an relocation of requirements from the CTS to licensee-controlled documents and (2) implementation schedule for new and revised surveillance requirements (SRs) in the ITS.

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The Commission's proposed action on the JAFNPP application for an amendment dated March 31, 1999, was published in the *Federal Register* on November 8, 1999 (64 FR 60854), December 13, 1999 (64 FR 69574), and on November xx, 2001 (XX FR xxxxx). The *Federal*

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In addition, two license conditions are deleted because, for one, the requirements have been incorporated into the ITS, and for the second, the ITS does not require it to be located in the ITS; it is allowed to be relocated to plant controlled documents.

Register notices also addressed changes outsite the scope of converting to ITS (beyond-scope issues) identified in the licensee's supplemental submittals and by the staff during its review of the submittals.

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

The NRC staff acknowledges that, as indicated in the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, it is acceptable that the ITS differ from the STS to reflect the current licensing basis for JAFNPP.

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

2.0 BACKGROUND

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

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

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

Surveillance Requirements

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During

The license amendment application was organized such that changes were included in each of the following CTS change categories, as appropriate:

(1) Administrative Changes (A) are changes to the CTS that do not result in new requirements or change operational restrictions or flexibility;

(2) Technical Changes - More Restrictive, (M) are changes to the CTS that establish a new requirement, require new or more frequent testing, or reduce operational flexibility;

(3) Technical Changes - Less Restrictive (specific), (L) are changes that eliminate existing requirements, require less or less frequent testing, or increase operational flexibility;

(4) Technical Changes - Less Restrictive (removal of details), (LA) are changes that relocate details out of the CTS and into the Bases, UFSAR, or other appropriate licensee-controlled document. These changes are less restrictive because they result in a less restrictive change control process and a reduced level of regulatory oversight;

(5) Relocated Specifications, (R), i.e., relaxations in which whole specifications are removed from the CTS and placed in licensee-controlled documents. (using the guidance of the four criteria specified in 10 CFR 50.36)

The changes that are in the ITS conversion for JAFNPP for each of the above categories are listed in the following five tables (matrixes) attached to this SE:

- Table A of Administrative Changes to Current Technical Specifications
- Table M of More Restrictive Changes to Current Technical Specifications
- Table L of Less Restrictive Changes to Current Technical Specifications
- Table LA of Relocated Details from Current Technical Specifications
- Table R of Relocated Specifications from Current Technical Specifications

The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are provided in the licensee's application and supplemental letters.

The general categories of changes to the licensee's CTS requirements and STS differences may be better understood as follows:

A. Administrative Changes

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

1. Identifying plant-specific wording for system names, etc.;

2. Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS;

All of the less-restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of CTS requirements that can be grouped in ten types as follows:

Type 1 — Relaxation of LCO Requirements

Type 2 — Relaxation of Applicability

Type 3 — Relaxation of Surveillance Requirement

Type 4 — Relaxation of Required Action Detail

Type 5 — Relaxation of Required Actions to Exit Applicability

Type 6 — Relaxation of Completion Time

Type 7 — Allow Mode Changes When LCO Not Met

Type 8 — Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

Type 9 — Elimination of CTS Reporting Requirement

The following discussions address why the various types of changes are acceptable.

Type 1 — Relaxation of the LCO Requirements

Certain CTS LCOs contain operational and system parameters beyond those necessary to meet safety analysis assumptions and therefore are considered overly restrictive. CTS also contain limits which have been shown to give little or no safety benefit to the safe operation of the plant. The ITS, consistent with the guidance in the STS, delete or revise operating limits in this type. CTS LCO changes included in this type are: (1) revising setpoints to be consistent with instrument setpoint methodologies; (2) deleting or revising operational limits to establish requirements consistent with applicable safety analyses; (3) deleting equipment or systems which establish redundant system capability beyond that assumed to function by the applicable safety analyses or which are implicit to the ITS requirement for systems, components and devices to be operable; and (4) adding allowances to use administrative controls on plant devices and equipment during times when automatic control is required or to establish temporary administrative limits, as appropriate, to allow time for systems to establish equilibrium operation.

TS changes represented by this type allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. They also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. These changes are consistent with STS and are acceptable.

Type 2 — Relaxation of Applicability

The CTS require compliance with the LCO during the Operational Mode(s) or other conditions specified in the LCO Applicability statement. Five Operating Modes are defined by TS according to average reactor coolant temperature, the position of the reactor mode switch located in the control room, and reactor vessel head closure bolt tensioning; Power Operation, Startup, Hot Shutdown, Cold Shutdown and Refueling. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem or component specified in the LCO, the LCO is changed in the ITS to establish a consistent set of requirements. These modifications or deletions are acceptable because, during the conditions referenced in the ITS, the operability requirements are consistent with the applicable safety analyses. These changes are consistent with STS and are acceptable.

Type 3 — Relaxation of Surveillance Requirement

CTS require maintaining the LCO equipment operable by meeting the SRs in accordance with the specified SR Frequency. This requires conducting tests to demonstrate equipment is operable, or that LCO parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes in this type relate to relaxation of CTS SR acceptance criteria and/or the conditions for performing the SR.

Relaxing the SR acceptance criteria for these items provides operational flexibility consistent with the objective of the STS without reducing confidence that the equipment is operable. The ITS also permits the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. TS required features cannot distinguish between an "actual" signal and a "test" signal. The changes to TS acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable.

Relaxing conditions for performing SRs include, for example, not requiring testing of de-energized equipment (e.g., instrumentation Channel Checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). The changes also include the allowance to verify the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning valves small. These changes are acceptable because the changes do not affect the ability to determine whether equipment is capable of performing its intended safety function.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These changes are consistent with STS and are acceptable.

Type 4 — Relaxation of Required Action Detail

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. In revising the Required Actions, details are deleted or options are added such that resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. Furthermore, adopting STS action requirements results in simpler, more concise and more direct action requirements. This allows more effective use of operator resources for placing and maintaining the reactor in a safe condition when the LCO is not met. These changes are consistent with STS and are acceptable.

Type 5 — Relaxation of Required Actions to Exit Applicability

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

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Type 6 — Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Type 6 are acceptable.

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Type 7 — Allow Mode Changes When LCO Not Met

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CTS 3.0.4 (ITS LCO 3.0.4) precludes entry into the applicable Mode or other specified conditions while relying on the Actions, even though the Actions are

designed to provide for safe operation of the plant. Unless otherwise stated, ITS LCO 3.0.4 is always applicable to action requirements associated with ITS LCO. However, ITS adds a Note to certain Actions stating "LCO 3.0.4 is not applicable." The addition of this Note allows transition between Applicability Modes or other specified conditions with the LCO not met (i.e., relying on the Actions) even though the Actions may require plant shutdown. The addition of "LCO 3.0.4 is not applicable" notes does not impact normal operation of the plant for the specified LCO features and would not provide additional initiators for plant transients during the Mode or other specified conditions. This exception to ITS 3.0.4 is acceptable due to the passive function or the installed redundancy of the features, the plant conditions that apply to the Note, and the low probability of an event requiring the inoperable features. These changes are consistent with STS and are acceptable.

Type 8 — Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

Some CTS LCOs and action requirements specify "lock" the mode switch in "Shutdown" (shutdown position) or "Refuel" (refueling position). Other CTS action requirements also specify placing the reactor in the shutdown or refueling Mode without requiring the mode switch to be "locked." The requirement to "lock" the mode switch in Shutdown or Refuel is not retained in the ITS. CTS Table 1-2, "Operational Modes" (ITS Table 1.1-1) defines reactor operational Modes based on the reactor mode switch position, among other things. Moving a reactor mode switch from Shutdown into a position other than Shutdown or Refuel may cause a Mode change as defined by TS, and results in associated TS compliance requirements for the LCOs that become applicable in the new Mode. CTS 3.0.4 (ITS LCO 3.0.4) precludes changes in reactor Modes without all TS required equipment operable. Thus, ITS LCO 3.0.4 is an administrative requirement put in place to prevent movement of the reactor mode switch between positions without first ensuring TS required equipment is operable, and changing the mode switch from the required position is adequately controlled by ITS Table 1.1-1 without adding a requirement to "lock" the mode switch. These changes are consistent with the STS and are acceptable.

Definitions 1.0.C, 1.0.D, 1.0.I, and 1.0.O

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Type 9 — Elimination of CTS Reporting Requirement

CTS include requirements to submit special reports to the NRC when specified limits or conditions are not met. Typically, the time period for the report to be issued is "within 30 days." However, the ITS eliminates the TS requirements for special reports and instead relies on the reporting requirements of 10 CFR 50.73. The changes to the reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. CTS also include requirements for reports to be made to the NRC on data gathered as part of routine plant programs. These requirements have no impact on the safe operation of the plant and can removed from the ITS.

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Deleting TS reporting requirements reduces unnecessary regulatory burden on the plant and allows the licensee to concentrate its efforts on maintaining

operation within TS required limits. These changes are consistent with the STS and are acceptable.

D. Technical Changes — Less Restrictive Removal of Details (LA)

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

Type 1 — Details of System Design and System Description including Design Limits

Type 2 — Descriptions of System & Operation

Type 3 — Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

Relocated

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

Type 1 — Details of System Design and System Description Including Design Limits

The design of the facility is required to be described in the Updated Final Safety Analysis Report (UFSAR) by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved QA plan (UFSAR Chapter 17). In 10 CFR 50.59, controls are specified for changing the facility as described in the UFSAR (including the Technical Requirements Manual (TRM)); and in 10 CFR 50.54(a), criteria are specified for changing the QA plan. The ITS Bases also contain descriptions of system design. ITS 5.5.11 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the UFSAR (including TRM) in accordance with 10 CFR 50.59 or the ITS Bases, as appropriate. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR). ITS Section 5.6, Administrative Controls, includes the programmatic requirements for the COLR.

Program

Type 2 — Descriptions of System & Operation

The plans for the normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating

procedures including procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR. The ITS Bases also contain descriptions of system operation.

Trip Setpoints are not in CTS

~~The FitzPatrick CTS include instrumentation trip setpoints and Allowable Values. Trip setpoints are instrument field settings. Allowable Values are the limiting values of the instrument trip setpoint before the LCO is exceeded, and the relationship between the trip setpoints and the Allowable Values is determined through the setpoint methodology approved by the staff. Trip setpoints are system operation details that can be adequately controlled by licensee-controlled documents without adversely affecting safe operation of the plant. Allowable Values are specified in the ITS, while trip setpoints are relocated to the TRM.~~

It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the UFSAR (including TRM) and the TS Bases, as appropriate.

Type 3 — Procedural Details for Meeting TS Requirements, Relocated Reporting Requirements, and Specification Requirements

Details for performing TS Actions and SRs are more appropriately specified in the plant procedures required by ITS 5.4.1, and described in the UFSAR and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an ITS action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as that for the COLR, included in ITS Section 5.6, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. The QA Program is approved by the NRC and contained in UFSAR Chapter 17, and changes to the QA Program are controlled by 10 CFR 50.54(a). The Offsite Dose Calculation Manual (ODCM) is required by ITS 5.5.1. The TRM is incorporated by reference in to the UFSAR, and changes to the TRM are controlled by 10 CFR 50.59. The Inservice Testing (IST) program is required by ITS 5.5.7.

Relocating specification requirements, including LCO, action, and surveillance requirements, have been made in adopting the STS. For example, for certain power operated isolation valves that do not receive an automatic isolation signal and for which the closure time is not assumed in the safety analysis, requirements for periodic testing of these valves are moved to the procedures that implement the inservice testing program (10 CFR 50.55a). Support system specification requirements for other equipment with its own specifications are or the TRM (10 CFR 50.59)

moved to the TRM. The definition of operability, as applied to the supported features, provides sufficient assurance that the supporting system can perform its required support function.

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR (including TRM), ITS Bases, and ITS administrative control programmatic and report requirements (e.g., COLR), as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process.

Table LA describes the information that is removed from individual CTS requirements and relocated to ENO-controlled documents. Table LA is organized by ITS section and includes the following: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the document that retains the moved CTS requirements; and the specific change type, as discussed above.

The NRC staff has concluded that these types of detailed information and specific requirements are not necessary in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following ENO-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

1. TS Bases controlled by ITS 5.5.11, "Technical Specifications Bases Control Program."

2. UFSAR (includes TRM by reference) controlled by 10 CFR 50.59.

3. ODCM controlled by ITS 5.5.1, "Offsite Dose Calculation Manual."

4. QA ~~Manual~~ Program controlled by 10 CFR 50.54. (a) This is what LA Table says

5. Inservice Testing Program controlled by ITS 5.5.7, "Inservice Testing Program," and 10 CFR 50.55a. 59 This is what LA Table says

None of these types in LA Tables

6. ~~Inservice Inspection Program controlled by 10 CFR 50.55a.~~

7. ~~Core Operating Limits Report controlled by ITS 5.6.5, "Core Operating Limits Report (COLR)."~~

To the extent that requirements and information have been relocated to ENO-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part 2.0 of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be ~~deleted~~ relocated from the CTS.

6. Plant procedures controlled by the Fitz Patrick procedure control process.

This is in LA Table

E. Relocated CTS Specifications

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36) may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. This section of the SE discusses the relocation of entire specifications in the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and its supplements, the licensee proposed relocating such specifications from the CTS to the UFSAR, which includes the TRM, the Process Control Program (PCP), and the ODCM, as appropriate. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the UFSAR, TRM, PCP, and ODCM is acceptable in that changes to the UFSAR, TRM, PCP, and ODCM will be adequately controlled by 10 CFR 50.59, 10 CFR 50.54(a), 10 CFR 50.55a, and ITS 5.5.1 as applicable. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R includes: (1) references to the DOCs, (2) references to the relocated CTS specifications, (3) summary descriptions of the relocated CTS specifications, (4) names of the documents that will contain the relocated specifications (i.e., the new location), and (5) the methods for controlling future changes to the relocated specifications (i.e., the regulatory control process).

The NRC staff's evaluation of each relocated specification listed in Table R is provided below, mostly in CTS order. New locations for relocated CTS are listed in Table R of Attachments to the SE.

1. 3/4.2.C CONTROL ROD BLOCK ACTUATION -Average Power Range Monitor (APRM)

The Average Power Range Monitor (APRM) control rod blocks function to limit control rod withdrawal errors during power range operations utilizing LPRM signals to create the APRM rod block signal. APRMs provide information about the average core power and APRM rod blocks are not used to mitigate a design basis accident (DBA) or transient. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Control Rod Block LCO and Surveillances applicable to APRM Instrumentation may be relocated to other plant controlled documents outside the ITS.

2. 3/4.2.C CONTROL ROD BLOCK ACTUATION - Intermediate Range Monitor (IRM)

The Intermediate Range Monitor (IRM) control rod blocks function to limit control rod withdrawal errors during reactor startup utilizing IRM signals to create the rod block signal. IRMs are provided to monitor the neutron flux levels during refueling, shutdown, and startup conditions. No design basis accident (DBA) or transient analysis takes credit for rod block signals initiated by IRMs. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Control Rod Block LCO and Surveillances applicable to APRM Instrumentation may be relocated to other plant controlled documents outside the ITS. IRM

3. 3/4.2.C CONTROL ROD BLOCK ACTUATION - Source Range Monitor (SRM)

Indent

The Source Range Monitor (SRM) control rod blocks function to limit control rod withdrawal errors during reactor startup utilizing SRM signals to create the rod block signal. SRM signals are used to monitor neutron flux during refueling, shutdown and startup conditions. No design basis accident (DBA) or transient analysis takes credit for rod block signals initiated by the SRMs. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Control Rod Block LCO and Surveillances applicable to SRM Instrumentation may be relocated to other plant controlled documents outside the ITS.

4. 3/4.2.C CONTROL ROD BLOCK ACTUATION Scram Discharge Instrument Volume High Water Level (SDVHWL)

The Scram Discharge Instrument Volume High Water Level (SDVHWL) control rod block functions to prevent control rod withdrawals, utilizing SDVHWL signals to create the rod block signal if water is accumulating in the scram discharge instrument volume. The purpose of measuring the scram discharge instrument volume water level is to ensure that there is sufficient volume to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal provides an indication to the operator that water is accumulating in the scram discharge instrument volume and prevents further rod withdrawals. With continued water accumulation, a reactor protection system initiated scram signal will occur. Thus, the SDVHWL rod block signal provides an opportunity for the operator to take action to avoid a subsequent scram. No design basis accident (DBA) or transient takes credit for rod block signals initiated by the SDVHWL instrumentation. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Control Rod Block LCO and Surveillances applicable to SDVHWL Instrumentation may be relocated to other plant controlled documents outside the ITS.

5. 3/4.2.H ACCIDENT MONITORING INSTRUMENTATION

Each individual accident monitoring parameter has a specific purpose; however, the general purpose for all accident monitoring instrumentation is to provide sufficient information to confirm an accident is proceeding as anticipated, i.e. automatic safety systems are performing properly, and deviations from expected accident course are minimal. The NRC position on application of the screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 7, 1988 from T.E. Murley (NRC) to R.F. Janecek (BWROG). The position stated in the letter was that the post-accident monitoring instrumentation table should list, on a plant specific basis, all Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments. Accordingly, this position has been applied to the JAFNPP RG 1.97 instruments. Those instruments meeting these criteria have been retained in Technical Specifications.

In addition to the above instrumentation in CTS, the licensee also proposed to reclassify 4 variables (Core Spray Flow, Core Spray Discharge Pressure, LPCI (RHR) Flow, and RHR Service Water Flow,) from "Type A and Category 1" to

"Type D and Category 2" to be included in the above group of instrumentation. The staff reviewed the licensee's justification for this reclassification, and finds the reclassification acceptable:

The staff has determined that for the proposed instrumentation to be relocated, the screening criteria 10 CFR 50.36 have not been satisfied, and thus their associated LCO and related Surveillances may be relocated to other plant controlled documents outside the ITS. The instrumentation to be relocated are as follows:

- Stack High Range Effluent Monitor
- Turbine Building Vent High Range Effluent Monitor
- Radwaste Building Vent High Range Effluent Monitor
- Safety/Relief Valve Position Indicator
- Torus Water Level (narrow range)
- Drywell — Torus Differential Pressure
- Core Spray Flow
- Core Spray Discharge Pressure
- LPCI (RHR) Flow
- RHR Service Water Flow

6. 3/4.6.F STRUCTURAL INTEGRITY

The structural integrity of the reactor coolant system shall be maintained at the level required by the original acceptance standards throughout the life of the plant. The inspection programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity of these components will be maintained throughout the components life. Other Technical Specifications require important systems to be Operable (for example, ECCS 3/4.5.A) and in a ready state for mitigative action. This specification is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. Hence, it is not necessary to retain this specification to ensure continuous operability of safety systems.

Further, this specification prescribes inspection requirements which are performed during plant shutdown. It is therefore not directly important for responding to DBAs, and the specification requirement is currently covered by 10 CFR 50.55a and the plant's Inservice Inspection Program.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Structural Integrity LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

7. 3/4.7.A.3 PRIMARY CONTAINMENT PURGE

The containment shall be purged through the Standby Gas Treatment System whenever the primary containment integrity is required. If this requirement cannot be met, then purging shall be discontinued without delay. The drywell vent and purge system is used primarily to control drywell-to-suppression chamber differential pressure during reactor operation, to reduce drywell airborne radioactivity levels before personnel entry and to purge the nitrogen

from the drywell for personnel safety. This LCO is intended to provide reasonable assurance that releases from normal drywell purging operations will not exceed the annual dose limits of 10 CFR Part 20 for unrestricted areas. These limits are not related to protection of the public from the consequences of any DBA or transient. The acceptability of the relocation of this Specification from the plant Technical Specifications has already been approved by the NRC as indicated in Generic Letter 89-01. ~~As discussed in Section 6.0 and summarized in Table 6-1 (Item 318) of NEDO-31466, Supplement 1, venting or purging of the drywell, as controlled by this specification, was found to be a non-significant risk contributor to core damage frequency and offsite releases.~~ The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Primary Containment Purge LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

deleted consistent with all other "R" descriptions

8. 3/4.8 MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES

Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material, shall have removable contamination of less than or equal to 0.005 microcuries. The limitations on miscellaneous radioactive materials sources are intended to ensure that the total body or individual organ irradiation doses does not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limitation of $\leq$ 0.005 microcuries of removable contamination on each sealed source. This requirement and the associated Surveillance Requirements bear no relation to the conditions or limitations which are necessary to ensure safe reactor operation. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Miscellaneous Radioactive Materials Sources LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

9. RETS 2.1 LIQUID EFFLUENT MONITORS

The radioactive liquid effluent monitoring instrumentation is neither a safety system nor is it connected to the reactor coolant system. This instrumentation is used for the purpose of showing conformance to the discharge limits of 10 CFR Part 20. It is not installed to detect excessive reactor coolant leakage. The radioactive liquid effluent monitors are used routinely to provide continuous check on the release of radioactive liquid effluent from the normal plant liquid effluent flow paths. These specifications require the licensee to maintain operability of various liquid effluent monitors and establish setpoints in accordance with the ODCM. The alarm/trip setpoints are established to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. Plant design basis accident (DBA) analyses do not assume any action, either automatic or manual, resulting from radioactive liquid effluent monitors. The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Radioactive Liquid Effluent Monitoring Instrumentation LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

10. RETS 2.2 CONCENTRATION OF LIQUID EFFLUENTS

The current requirement for concentration of radioactive materials released to the unrestricted areas shall not exceed the values specified in 10 CFR Part 20, Appendix B, Table II, Column 2, and for dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microcurie/ml. 10 CFR Part 20, BII(2) refers to releases to an unrestricted area of radioactive material in concentrations that exceed the specified limits. No screening criteria apply because the process variable of the LCO is not an initial condition of a design basis accident (DBA) or transient analysis. Neither does the system comprise a part of the safety sequence analysis or a part of the primary coolant pressure boundary. Effluent control is for protection against radiation hazards from licensed activities, not accidents.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Concentration LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

11. RETS 2.3 DOSE FROM LIQUID EFFLUENTS

Limitations of the quarterly and annual projected doses to members of the public which result from cumulative liquid effluent discharges during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR Part 50, Appendix I. These limits are not related to protection of the public from any design bases accident or transient.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Dose from Liquid Effluents LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

12. RETS 2.4 LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM

The requirement for a liquid waste treatment system in 10 CFR Part 50, Appendix A, GDC 60, pertains to controlling the release of site liquid effluents during normal operational occurrences. No loss of primary coolant is involved; neither is an accident condition assumed or implied. The limits for release in 10 CFR Part 50, Appendix I, Sec. II.A, for liquids are design objectives for operation.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Liquid Radioactive Waste Treatment System LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

13. RETS 3.1 GASEOUS EFFLUENT MONITORS

The radioactive gaseous effluent monitors are neither a safety system nor is it connected to the reactor coolant system. The primary function of this instrumentation is to show conformance to the discharge limits of 10 CFR Part 20. This instrumentation is not installed to detect excessive reactor coolant leakage. The radioactive gaseous effluent monitors are used routinely to provide continuous check on the releases of radioactive gaseous effluents from the

normal plant gaseous effluent flow paths. These Technical Specifications require the Licensee to maintain operability of various effluent monitors and establish setpoints in accordance with the ODCM. The alarm/trip setpoints are established to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. Plant DBA analyses do not assume any action, either automatic or manual, resulting from radioactive effluent monitors (except as indicated in the Discussion of Changes for ITS 3.3.6.2, Secondary Containment Instrumentation. The Refuel Floor, and Reactor Building exhaust monitor are retained in ITS 3.3.6.2).

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Gaseous Effluent Monitors LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

14. RETS 3.2 GASEOUS DOSE RATE

This LCO limits the dose rate due to gaseous effluents in unrestricted areas at any time to a value less than the yearly dose limit of 10 CFR Part 20. This provides reasonable assurance that no member of the public is exposed to annual average concentrations which exceed the limits of 10 CFR Part 20 Appendix B, Table-II. This is a limit which applies to normal operation of the plant. It is not assumed as an initial condition of any design basis accident or transient and is not relied upon to limit the consequences of such events.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Gaseous Dose Rate LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

15. RETS 3.3 AIR DOSE, NOBLE GASES

The air dose to areas at or beyond the site boundary from noble gases released from the plant in gaseous effluents shall be limited. Limitation of the quarterly and annual air doses from noble gases in plant gaseous effluents during normal operation over extended periods is intended to assure compliance with the dose objectives of 10 CFR Part 50, Appendix I. These limits are not related to protection of the public from the consequences of any design basis accident or transient.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Air Dose, Noble Gases LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

16. RETS 3.4 DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

The dose to a member of the public at or beyond the site boundary from Iodine-131, Iodine-133, Tritium, and radionuclides in particulate form with half-lives greater than 8 days released from the plant in gaseous effluents shall be limited. Limitation of the quarterly and annual projected doses to members of the public from radionuclides other than noble gases during normal operation over extended periods is intended to assure compliance with the dose objectives of

10 CFR Part 50, Appendix I. These limits are not related to protection of the public from the consequences of any design basis accident or transient.

The staff has determined that the screening criteria of 10 CFR 50.36 have not been satisfied, and thus the Dose due to Iodine-131, Iodine-133, Tritium, and Radioactive Material In Particulate Form LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

Insert 3.5.6

18. RETS 3.6 OFFGAS TREATMENT SYSTEM

The Offgas Treatment System shall be used to reduce the concentration of radioactive materials in gaseous effluents prior to release from the plant within 24 hours after the start-up of the second turbine driven feedwater pump. The Offgas Treatment System reduces the activity level of the non-condensible fission product gases from fuel defects removed from the main condenser prior to their release to the environs. The Operability of the Offgas Treatment System is required to meet the requirements of 10 CFR 50.36a and General Design Criteria 60 of Appendix A to 10 CFR Part 50 (i.e., releases of radioactive materials in gaseous effluents will be kept "as low as reasonably achievable"). The Operability of the Offgas Treatment System is not assumed in the analysis of any design bases accident or transient. However, offgas activity is an initial condition of a design basis accident and is being retained in ITS LCO 3.7.5. Therefore, there is no need to retain this requirement. As discussed in Sections 3.5 and 6, and summarized in Table 4-1 (Item 303) of NEDO-31466, the loss of the Offgas Treatment System was found to be a non-significant risk contributor to core damage frequency and offsite releases.

deleted for consistency with other "R" discussions

The staff has determined that the screening criteria of 10 CFR 50.36 have not been satisfied, and thus the Offgas Treatment System LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

19. RETS 4.0 4.1 SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM

The solid radwaste system is used in accordance with the PCP to process wet radioactive wastes to meet shipping and burial ground requirements. The Solid Radwaste System is a logical continuation of the liquid radwaste system. It operates on the same requirement for effluent control, identified as 10 CFR Part 50, Appendix A, GDC 60. The system serves to control operational release of solid waste, not accidental release.

The staff has determined that the screening criteria of 10 CFR 50.36 have not been satisfied, and thus the Solid Radioactive Waste-Process Control Program LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

20. RETS 5.0 5.1 TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLE

The dose or dose commitment to any member of the public, due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited. This LCO limits the annual doses to individual members of the public from all plant

INSERT 3.5.b

17. RETS 3.5.b SJAE RADIATION MONITORS

The SJAE radiation monitors are neither a safety system nor are they connected to the reactor coolant system. The primary function of this instrumentation is to show conformance to the discharge limits of 10 CFR Part 20. This instrumentation is not installed to detect excessive reactor coolant leakage. The SJAE System monitors are used routinely to provide a continuous check on the releases of radioactive gaseous effluents from the Main Condenser Steam Jet Air Ejector. These Technical Specifications require the Licensee to maintain Operability of the SJAE radiation monitors and establish setpoints. The alarm/trip setpoints are established to ensure that the alarm/trip will occur to prevent exceeding the limits of 10 CFR Part 20. Plant DBA analyses do not assume any action, either automatic or manual, resulting from these monitors.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the SJAE Radiation Monitors LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

sources. This is intended to assure that normal operation of the plant is in compliance with the provisions of 40 CFR Part 190. These limits are not related to protection of the public from any design basis accident or transient.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Total Dose from the Uranium Fuel Cycle LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

21. ~~ITS~~ RETS 6.1 RADIOLOGICAL ENVIRONMENTAL MONITORING - MONITORING PROGRAM

The radiological environmental monitoring program required by this specification provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from station operations. This program monitors the long term impact of normal plant operations.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Monitoring Program LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

22. ~~ITS~~ RETS 6.2 LAND USE CENSUS PROGRAM

A land use census is conducted to identify the locations of all milch animals, the nearest residence, and all gardens of greater than 50 square meters producing fresh leafy vegetables, in each of the 16 meteorological sectors within a distance of 5 miles from the site. The land use census required by this specification supports the measurement of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from station operations. This program ensures that changes in the use of areas at or beyond the site boundary are identified and changes made to the radiological environmental monitoring program, if required.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Land Use Census Program LCO and Surveillances may be relocated to other plant controlled documents outside the ITS.

23. ~~22~~ RETS 6.3 INTERLABORATORY COMPARISON PROGRAM

The interlaboratory comparison program required by this specification confirms the accuracy of the measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public resulting from station operation. This program ensures independent checks on the precision and accuracy of the instrumentation used in the measurements of radioactive material for the radiological environmental monitoring program are performed.

The staff has determined that the screening criteria 10 CFR 50.36 have not been satisfied, and thus the Interlaboratory Comparison Program LCO and Surveillances may be relocated to other plant controlled documents outside the Technical Specifications.

The relocated specifications from the CTS discussed above are not required to be in the TS because they do not fall within the criteria for mandatory inclusion in the TS as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff has concluded that appropriate controls have been established for all of the current specifications and information that are being moved to the USAR, TRM, ODCM, or PCP. ~~or ISI Program~~ These relocations are the subject of a new license condition discussed in Section 5.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. ~~and 10 CFR 50.55a~~ Accordingly, the specifications and information, as described in detail in this SE, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's application dated March 31, 1999, as supplemented by letters dated ~~May 20~~, June 01, July 14, and October 14, 1999, February 11, April 04, April 13, June 30, July 31, September 12, September 13, and October 23, 2000, ~~February 20~~, May 31, ~~August 6~~, and October 18, 2001.

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

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Sections 3.D and 3.E above. The facility and procedures described in the UFSAR and TRM, which is a part of the UFSAR, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from the CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. For example, the Offsite Dose Calculation Manual can be changed in accordance with ITS 5.5.1, and the administrative instructions that implement the QA ~~Plan~~ Program can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA ~~Plan~~ Program for JAFNPP and such applicable regulations as 10 CFR 50.59.

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

G. Evaluation of Other TS Changes Included in the Application for Conversion to ITS

This section evaluates other TS changes included in JAFNPP's ITS conversion application. These include items which deviate from both the CTS and the STS, do not fall clearly into a

category, or are in addition to those changes that are needed to meet the overall purpose of the conversion. These changes are termed as the beyond-scope issues and were addressed in the notice of consideration of amendment published in the *Federal Register* on November 8, 1999, (64 FR 60854), December 13, 1999, (64 FR 69574), and November xx. 2001. (xx FR xxxxx).

The changes discussed below are listed in the order of the applicable ITS specification or section, as appropriate.

(14) JFD #'s are wrong and not needed. If JFD# is used, it is DB9

(1) ITS Table 3.3.1.1-1 Function 8 (DOC L~~6~~, ~~JFDs X3, CLB2~~), Turbine Stop Valve Closure
ITS Table 3.3.1.1-1 Function 9 (DOC L~~6~~, ~~JFDs X3, CLB2~~) Turbine Control Valve Fast Closure, EHC Oil Pressure - Low

Change Allowable Value, CTS Table 2.1.A, Item 3 and Table 3.1-1, Item 15, Turbine Stop Valve Closure, from "≤ 10% valve closure" to "≤ 15% closed."

Change Allowable Value, CTS Table 2.1.A, Item 4 and Table 3.1-1, Item 14, Turbine Control Valve Fast Closure, from "500 ≤ p ≤ 850 psig" to "≥ 500 psig and ≤ 850 psig."

The proposed allowable values have been established consistent with the New York Power Authority (NYPA) Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with Regulatory Guide (RG) 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorses ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

Insert AV

(2) ITS Table 3.3.1.1-1, Function 5 ~~(DOC L9) Main steam line Isolation Valve - Closure~~

The proposed ITS changes Allowable Value from "≤ 10 percent valve closure from full open" to "≤ 14% closed". The licensee stated that proposed allowable value has been established consistent with the JAFNPP Engineering Standards Manual, IES-3, Revision 0, "Instrument Loop Accuracy and Setpoint Calculation Methodology." and that the methodology used to determine the allowable value is consistent with the methodology described in ISA-S67.04-1994, Part II, "Methodologies for the Determination of Setpoints for Nuclear Safety-Related Instrumentation."

The proposed allowable value was calculated by applying calibration based errors to the trip setpoint; thereby establishing an operability limit associated with the entire loop of the instrumentation function. The proposed allowable value change is within the analytical limit for this function and does not affect the existing margin between

This is not a change to the CTS. It was deleted in the May 31 submittal. (CTS is ≤15%, ITS is ≤15%)

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

operating conditions and the reactor trip setpoint. Therefore, the staff finds proposed allowable value change acceptable.

(3) ITS Table 3.3.3.1-1, Function 10 (DOC LA3, L5) Suppression Pool Water Temperature Operability

This is Not a change to the CTS CTS does not have this footnote

The proposed change deletes Footnote (c) of the STS. In the STS the Required Channels for suppression pool water temperature is modified by footnote (c), which states, "Monitoring each [relief valve discharge location]." The STS Bases describes a suppression pool water temperature monitoring system that is different from the JAFNPP design. The proposed ITS Bases reflects the plant-specific suppression pool water temperature monitoring design. This plant-specific design is not based on a relationship with the relief valve discharge locations. Therefore, the deletion of Footnote (c) is appropriate and is acceptable.

(4) ITS 3.3.4.1 (DOCs A3, CLB1), ATWS-RTP Instrumentation

This is Not a change to the CTS. Number of required channels in CTS is not changed in the ITS. Bases was changed to reflect CTS logic.

The proposed change revises STS channel configuration. In STS 3.3.4.2, Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation, LCO 3.3.4.2 requires two channels per trip system for each ATWS-RPT function to be operable. The STS ATWS-RPT Bases describes a system that consists of two independent trip systems, with two channels of Reactor Pressure - High and two channels of Reactor Vessel Water Level - Low Low in each trip system. Either two Reactor Pressure - High or two Reactor Vessel Water Level - Low Low signals are needed to trip a trip system. The outputs are combined in a logic so that either trip system will trip both recirculation pumps.

The JAFNPP logic configuration in CTS Table 3.2-7, ATWS-RPT, is different from the configuration described in the STS Bases. The JAFNPP configuration includes one trip system with four channels of Reactor Pressure - High and four channels of Reactor Vessel Water Level - Low Low. Two channels of each function are powered by Division 1 and the other two channels of each function are powered by Division 2. The outputs of each channel provide input into the trip system which is one-out-of-two taken twice logic for each function. One channel from each division of the same function must trip to complete the logic. The trip system is arranged so that each function will trip both recirculation pumps.

In this proposed ITS 3.3.4.1, ATWS-RPT Instrumentation, LCO 3.3.4.1 requires four channels for each ATWS-RPT function to be operable. The staff also reviewed plant-specific ATWS-RPT configuration as described in the ITS Bases B 3.3.4.1, and finds the requirement for four channels of each function being operable is appropriate for this plant-specific application, and therefore is acceptable.

(5) ITS 3.3.5.1 (DOCs L1, L5) ADS Initiation timer and the CS and LPCI pump start timer values

This is Not a change to the CTS. CTS Allowable Value and ITS Allowable Value are same. This change was deleted in May 31 submittals, since AMD. 263 approved this change for the CTS.

The proposed change involves changes to the allowable values of the residual heat removal (RHR) and core spray (CS) pump start timers as well as the automatic depressurization system (ADS) auto blowdown timer. The calibration interval of the timers is being changed from six months to 24 months, and the allowable values of the timers are being changed to reflect the additional drift associated with the longer interval

and provide a wider, more achievable as-left calibration tolerance band for field technicians. The purpose of the RHR and CS pump start timers is to sequentially load (stagger) the electrical motor driven pumps, associated with the RHR and CS systems, onto the emergency diesel generators (EDGs) for a concurrent loss of offsite power and loss of coolant accident event. Sequential loading of these electrical loads during this event is necessary to avoid the overloading of the EDGs that might occur if multiple motors were simultaneously energized from the EDGs. They are therefore necessary to ensure the EDGs are capable of performing they required function in accordance with the JAFNPP licensing basis requirements specified for the onsite electric power system. If the tolerance of the timers is too large, a potential can be created that there will not be a sufficient time interval allowed for recovery of the EDG voltage and frequency from one group of motor starts to the subsequent group of motor starts.

Table 3.2-2 in the JAFNPP CTS specifies the time delays for one group of RHR (LPCI) pump timers as 1.0 + 0.5 (-) 0 seconds (nominally 1 second). The time delays for the second group of RHR (LPCI) pump timers is specified as 6.0 ± 0.5 seconds (nominally 6 seconds). The time delays for the CS pump timers is specified as 11 ± 0.6 seconds (nominally 11 seconds).

Table 3.3.5.1-1 in the proposed FitzPatrick ITS specifies the corresponding time delays for the nominal 1 second timers as ≥.07 seconds and ≤.43 seconds. The corresponding time delays specified for the nominal 6 second timers are ≥.15 seconds and ≤.85 seconds. The time delays specified for the nominal 11 second timers are ≥.5 seconds and ≤2.5 seconds.

Comparison of the above changes indicates that the worst case minimum time interval between the nominal 1-second timers and nominal 6-second timers has been reduced from 4 seconds to 3.72 seconds. The worst case time interval between the nominal 6-second timers and 11-second timers has been reduced from 3.9 seconds to 2.65 seconds.

The licensee's safety evaluation (SE) attached to his April 27, 2000, letter, states that the uncertainty analysis for the RHR and CS pump start timers assumed a voltage and frequency recovery time which envelopes the maximum allowable recovery time after motor loading as specified in Table 16.3-7 of the JAFNPP UFSAR. The SE states that the proposed trip setting values for these relays therefore account for this critical function.

The staff examined JAFNPP UFSAR Table 16.3-7. It found that item number 7 in the table provides the parameter for the JAFNPP EDG "AC voltage recovery time after motor loading," and item number 8 provides the "frequency recovery time after motor loading." For each of these parameters there are two limits specified that are pertinent to the load sequencing timer intervals. They are the "maximum expected" limit and the "maximum allowable" limit.

The JAFNPP UFSAR states that the "expected" limits, as shown in Table 16.3-7, were developed from the EDG factory test program results, and represent the maximum and minimum values recorded under the conditions of the factory testing program. It states that the "allowable" limits were developed from specifications and calculated values, the boundaries of which define the limits of normal machine operation.

The values specified in Table 16.3-7 for the maximum expected and maximum allowable limits of the JAFNPP EDG "AC voltage recovery time after motor loading" are 1.5 seconds and 2.0 seconds respectively. The values specified for "frequency recovery time after motor loading" are 1.75 seconds and 2.5 seconds. Both the maximum expected and maximum allowable limits for voltage recovery and frequency recovery are less than the minimum worst case time interval (2.65 seconds) of the RHR and CS pump sequencing timers specified in the proposed JAFNPP ITS. This therefore verifies that, during automatic emergency loading of the JAFNPP EDGs, the EDG voltage and frequency will recover in sufficient time following the starting of one RHR or CS pump motor group to allow successful starting of the subsequent group. The JAFNPP licensing basis requirements specified for the onsite electric power system are therefore met, and this JAFNPP ITS beyond scope issue is acceptable.

2

(6) ITS Table 3.3.5.1-1 (DOCs M6, M7, L6): M2,

e

The licensee proposed changes to the following Allowable Values:

- Function 1.c, Core Spray System, Reactor Pressure - Low (Injection Permissive) and Function 2.c, Low Pressure Coolant Injection System, Reactor Pressure - Low (Injection Permissive)

  Change Allowable Value CTS Table 3.2-2 Item 9, Reactor Low Pressure - from "≥ 450 psig" to "≥ 410 psig and ≤ 490 psig."

- Function 1.e, Core Spray System, Core Spray Pump Discharge Flow - Low (Bypass)

  Set Allowable Value as "≥ 510 gpm and ≤ 980 gpm."

Insert 2a

- Function 2.d, Low Pressure Coolant Injection System, Reactor Pressure - Low (Recirculation Discharge Valve Permissive)

  Change Allowable Value, CTS Table 3.2-2 Item 24, Reactor Low Pressure, from "285 to 335 psig" to "≥ 295 psig."

Insert 2b

- Function 2.g, Low Pressure Coolant Injection System, Low Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)

  Set Allowable Value as "≥ 1040 gpm and ≤ 1665 gpm."

- Function 2.h, Low Pressure Coolant Injection System, Containment Pressure - High

  Change Allowable Value, CTS Table 3.2-2 Item 6, Containment High Pressure, from "1 < p ≤ 2.7 psig" to "≥1 psig and ≤ 2.7 psig."

- Function 3.c, High Pressure Coolant Injection System, Reactor Vessel Water Level - High (Level 8)

  Change Allowable Value CTS Table 3.2-2 Item 3, Reactor High Water Level, from "≤ 222.5 inches above TAF" to "≤ 222.4 inches."

This change was deleted in October 18 submittal.

INSERT 2a

Function 1.f, Core Spray System, Core Spray Pump Discharge Pressure - High (Bypass)

Set Allowable Value as "≥ 90 psig and ≤ 110 psig."

INSERT 2b

Function 2.e, Low Pressure Coolant Injection System, Reactor Vessel Shroud Level (Level 0)

Change Allowable Value, CTS Table 3.2-2 Item 5, Reactor Low Level (inside shroud) - from "≥ 0 in above TAF" to "≥ 1.0 inch."

- Function 3.f, High Pressure Coolant Injection System, High Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)

Insert 2c

Set Allowable Value as "≥ 475 gpm and ≤ 800 gpm."

The above proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

5

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

Insert AV

(7) ITS Table 3.3.5.1-1, (DOC M6, JFD DB11) Reactor Low Level (inside shroud), Function 2.e, Low Pressure Coolant Injection System Reactor Vessel Shroud Level (Level 0)

Change covered by Item 2 above (Insert 2b), since Item 2 covers changes discussed in DOC M6.

The license proposed change to Allowable Value for CTS Table 3.3-2, Item 5, from "≥ 0.0 inches above TAF" to "≥ 1 inch". The proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with Regulatory Guide (RG) 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation" which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

This is not a change to the CTS. CTS Allowable Value and ITS Allowable Value are same. This change was deleted in May 31 submittal, since AMD 263 approved this change for the CTS.

(8) ITS Table 3.3.5.1-1,(DOC L1, JFD DB2, DB3, and DB11):

The license proposed changes to the following Allowable Values:

- Function 1.d, Core Spray System Core Spray Pump Start - Time Delay Relay,

INSERT 2c

Function 3.g, High Pressure Coolant Injection System, High Pressure Coolant Injection Pump Discharge Pressure - High (Bypass)

Set Allowable Value as "$\geq$ 25 psig and $\leq$ 80 psig."

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

Allowable Value for CTS Table 3.2-2 Item 11, Core Spray Pump Start Timer (each loop) from "11 ± 0.6 sec." to "≥ 9.5 seconds and ≤ 12.5 seconds".

- Function 2.f, Low Pressure Coolant Injection System Low Pressure Coolant Injection Pump Start - Time Delay Relay,
  Allowable Value for CTS Table 3.2-2 Item 12, RHR (LPCI) Pump Start Timer
  Change CTS "1st Pump (A Loop)" Allowable Value from "1.0 + 0.5 sec. (-) 0 sec." to ITS "Pump A ≥ 1.07 seconds and ≤ 1.43 seconds".

  Change CTS "1st Pump (B Loop)" Allowable Value from "1.0 + 0.5 sec. (-) 0 sec." to ITS "Pump D ≥ 1.07 seconds and ≤ 1.43 seconds".
  Change CTS "2nd Pump (A Loop)" Allowable Value from "6.0 ± 0.5 sec." to ITS "Pump B ≥ 5.15 seconds and ≤ 6.85 seconds".

  Change CTS "2nd Pump (B Loop)" Allowable Value from "6.0 ± 0.5 sec." to ≥ ITS "Pump C 5.15 seconds and ≤ 6.85 seconds".

- Functions 4.b Automatic Depressurization System A Trip System Automatic Depressurization System Initiation Timer and Function 5.b, Automatic Depressurization System B Trip System Automatic Depressurization System Initiation Timer

  Allowable Value for CTS Table 3.2-2 Item 13, Auto Blowdown Timer
  Change Allowable Value from "120 sec. ± 5 sec." to "≤ 134 seconds".

The above proposed allowable values are being modified to reflect the appropriate values according to a change in calibration frequency from 6 months to 24 months. The proposed change in surveillance frequency is consistent with the CTS Table 4.2-2 Item 4, Auto Sequencing Timers, frequency. The licensee has analyzed the potential drift based on a calibration frequency of 30 months and determined that the drift values do not exceed the drift allowance provided for these instruments.

The proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation" which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints.

This is not a beyond scope change since it was covered by an "A" DOC (A16)
An "A" DOC change is editorial in nature, thus it does not appear to meet the "beyond scope" classification.

Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

(9) ITS Table 3.3.5.1-1 (JFD DB11), Function 3.e, Low Pressure Coolant Injection Suppression Pool Water Level - High

The license proposed change to Allowable Value for CTS Table 3.2-2 Item 18, Suppression Chamber High Level from "≤ 6 in. above normal level" to "≤ 14.5 feet".

The staff reviewed the licensee response to the staff question and concurred that normal suppression pool water level is 13.88 to 14.00 feet. The CTS requires an allowable value of ≤ 6 inches above normal. The ITS allowable value of ≤ 14.5 is equivalent to the CTS value and is consistent with the format of the STS format. Therefore, this change is administrative in nature since there is no technical change, and is acceptable.

Change covered by Item 2 above (third bullet, after Insert 2a), since Item 2 covers DOC L6 changes.

(10) ITS Table 3.3.5.1-1 (DOC L6, JFD DB11) Function 2.d, Low Pressure Coolant Injection System Reactor Pressure - Low (Recirculation Discharge Valve Permissive)

The license proposed change to Allowable Value for CTS Table 3.2-2 Item 24, Reactor Low Pressure from "285 to 335 psig" to "≥ 295 psig".

The proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with Regulatory Guide (RG) 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation" which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

(~~11~~ 3) ITS Table 3.3.~~5~~6.1-1 (DOC L16, ~~JFD DB10~~) Function 3a, High Pressure Coolant Injection - System Isolation HPCI Steam Line Flow - High

The license~~s~~ e proposed ~~change~~ a to ~~Allowable~~ the Value for CTS Table 3.2-1, HPCI Turbine Steam Line High Flow from "≤ 160 in. H_2O dp" to ≤ "~~161~~ 168.24 inches of water dP".

The proposed allowable value~~s~~ ~~have~~ has been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in

compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorses ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

Insert AV

(12) ITS Table 3.3.6.1-1 (DOCs A7, M14):

The licensee proposed changes to the following Allowable Values:

(13) • Function 3.d, High Pressure Coolant Injection System Isolation, HPCI Steam Line Penetration (Drywell Entrance) Area Temperature - High, and Function 3.e, High Pressure Coolant Injection System Isolation, HPCI Steam Line Torus Room Area Temperature - High

See Item 2 format-indent

Change Allowable Value CTS Table 3.2-1 Item 16, HPCI Steam Line/Area Temperature, from "≤ 40°F above max. ambient" to "≤ 160°F."

Already said in header for Item 4

(14) • ITS Table 3.3.6.1-1 Function 3.f, High Pressure Coolant Injection System Isolation, HPCI RHR Heat Exchanger A Area Temperature - High and Function 3.g, High Pressure Coolant Injection System Isolation, HPCI RHR Heat Exchanger B Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 16, HPCI Steam Line/Area Temperature, from "≤ 40°F above max. ambient" to "≤ 170°F."

(15) • ITS Table 3.3.6.1-1 Function 3.h, High Pressure Coolant Injection System Isolation, RB Southwest Area of Elevation 272' Temperature - High, Function 3.i, High Pressure Coolant Injection System Isolation, RB Southeast Area of Elevation 272' Temperature - High, and Function 3.j, High Pressure Coolant Injection System Isolation, HPCI Equipment Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 16, HPCI Steam Line/ Area Temperature, from "≤ 40°F above max. ambient" to "≤ 144°F".

(16) • ITS Table 3.3.6.1-1 Function 4.d, Reactor Core Isolation Cooling System Isolation, RCIC Steam Line Penetration (Drywell Entrance) Area Temperature - High and Function 4.e, Reactor Core Isolation Cooling System Isolation, RCIC Steam Line Torus Room Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 20, RCIC Steam Line/Area Temperature, from "≤ 40°F above max. ambient" to "≤ 160°F".

(17) • ITS Table 3.3.6.1-1 Function 4.f, Reactor Core Isolation Cooling System Isolation, RCIC Equipment Area Temperature - High

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

Change Allowable Value, CTS Table 3.2-1 Item 20, RCIC Steam Line/Area Temperature, from "≤ 40°F above max. ambient" to "≤ 144°F".

(~~18~~) • ~~ITS Table 3.3.6.1-1~~ Function 5.a, Reactor Water Cleanup System Isolation, RWCU Suction Line Penetration Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 11, Reactor Water Cleanup System Equipment Area High Temperature Isolation, from "≤ 40°F above max. ambient" to "≤ ~~154.9~~°F". 144 Revision I change (Oct. 18 submittal)

(~~19~~) • ~~ITS Table 3.3.6.1-1~~ Function 5.b, Reactor Water Cleanup System Isolation, RWCU Pump Area Temperature - High Pump A

Change Allowable Value, CTS Table 3.2-1 Item 11, Reactor Water Cleanup System Equipment Area High Temperature Isolation, from "≤ 40°F above max. ambient" to "≤ ~~154.9~~°F". 165 Revision I change (Oct. 18 submittal)

(~~20~~) • ~~ITS Table 3.3.6.1-1~~ Function 5.b, Reactor Water Cleanup System Isolation, RWCU Pump Area Temperature - High Pump B

Change Allowable Value, CTS Table 3.2-1 Item 11, Reactor Water Cleanup System Equipment Area High Temperature Isolation, from "≤ 40°F above max. ambient" to "≤ ~~174.9~~°F". 175 Revision I change (Oct. 18 submittal)

(~~21~~) • ~~ITS Table 3.3.6.1-1~~ Function 5.c, Reactor Water Cleanup System Isolation, RWCU Heat Exchanger Room Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 11, Reactor Water Cleanup System Equipment Area High Temperature Isolation, from "≤ 40°F above max. ambient" to "≤ ~~154.9~~°F". 155 Revision I change (Oct. 18 submittal)

Insert 4a from Next 2 draft SER pages (34 + 35)

The above proposed allowable values ~~changes~~ have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

5

Insert AV

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

(~~22~~) 5 ITS Table 3.3.6.1-1 (DOCs ~~M14, L16~~ L17):

covered by Item 4 above

covered by Item 3 above

Insert 5a from next draft SER page (34)

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

Move to previous page (pg 33) as Insert 5a

The license~~d~~ proposed changes ~~to~~ to the ~~following~~ Allowable Values for

(~~23~~) ITS Table 3.3.6.1-1 Function 1.c, Main Steam Line Isolation, Main Steam Line Flow - High

Move to previous page (pg 33) as Insert 4a

~~Change Allowable Value,~~ CTS Table 3.2-1 Item 9, Main Steam Line High Flow, from "≤ 140% of Rated Steam Flow" to "≤ 125.9 psid."

(~~24~~) • ~~ITS Table 3.3.6.1-1~~ Function 1.e, Main Steam Line Isolation, Main Steam Tunnel Area Temperature - High

Change Allowable Value, CTS Table 3.2-1 Item 10, Main Steam Line Leak Detection High Temperature, from "< 40°F above max. ambient" to "≤ 195°F".

covered by Item 3

(~~25~~) • ~~ITS Table 3.3.6.1-1~~ Function 3.a, High Pressure Coolant Injection System Isolation, HPCI Steam Line Flow - High

Change Allowable Value, CTS Table 3.2-1 Item 13, HPCI Turbine Steam Line High Flow, from "≤ 160 in H_2O dp" to "≤ 168.24 ~~inches of water dP~~."

(~~26~~) • ~~ITS Table 3.3.6.1-1~~ Function 3.b, High Pressure Coolant Injection System Isolation, HPCI Steam Supply Line Pressure - Low

Change Allowable Value, CTS Table 3.2-1 Item 14, HPCI Steam Line Low Pressure, from "100 > P ≤ 50 psig" to "≥ 61 psig and ≤ 90 psig."

(~~27~~) • ~~ITS Table 3.3.6.1-1~~ Function 3.c, High Pressure Coolant Injection System Isolation, HPCI Turbine Exhaust Diaphragm Pressure - High

Change Allowable Value, CTS Table 3.2-1 Item 15, HPCI Turbine High Exhaust Diaphragm Pressure, from "≤ 10 psig" to "≤ 9.9 psig."

(~~28~~) • ~~ITS Table 3.3.6.1-1~~ Function 4.a, Reactor Core Isolation Cooling System Isolation, RCIC Turbine Steam Line Flow - High

Change Allowable Value CTS Table 3.2-1 Item 17, RCIC Turbine Steam Line High Flow from "≤ 282 in H_2O dp" to "≤ 272.26 inches of water dP."

(~~29~~) • ~~ITS Table 3.3.6.1-1~~ Function 4.b, Reactor Core Isolation Cooling System Isolation, RCIC Steam Supply Line Pressure - Low

Change Allowable Value, CTS Table 3.2-1 Item 18, RCIC Steam Line Low Pressure, from "100 > P ≤ 50 psig" to "≥ 58 psig and ≤ 93 psig."

(~~30~~) • ~~ITS Table 3.3.6.1-1~~ Function 4.c, Reactor Core Isolation Cooling System Isolation, RCIC Turbine Exhaust Diaphragm Pressure - High

Change Allowable Value, CTS Table 3.2-1 Item 19, RCIC Turbine High Exhaust Diaphragm Pressure, from "≤ 10 psig" to "≤ 5 psig."

Continuation of Insert 4a

(31) • ~~ITS Table 3.3.6.1-1~~ Function 6.a, Shutdown Cooling System Isolation, Reactor Pressure - High

Change Allowable Value, CTS Table 3.2-1 Item 3, Reactor High Pressure (Shutdown Cooling Isolation), from "≤ 75 psig" to "≤ 74 psig."

The above proposed allowable value~~s changes~~ has ~~have~~ been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorse~~s~~ ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable value~~s were~~ was calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value change~~s~~ does ~~do~~ not affect the existing licensing basis, and ~~are~~ is, therefore, acceptable.

Insert A

(32) ITS Table 3.3.6.1-1 (JFD DB11) Function 2.f, Primary Containment Isolation, Main Steam Tunnel Radiation - High

The license proposes changes to the following Allowable Values, CTS Table 3.2-1 Item 7, Main Steam Line Tunnel High Radiation, from "≤ 3 x Normal Rated Full Power Background" to "≤ 3 times Normal Full Power Background."

The CTS includes the definition of Rated Thermal Power. The ITS includes the definitions of Rated Thermal Power and Thermal Power. The CTS definition of Rated Thermal Power refers to both a steady state nuclear steam supply output and reactor core thermal power. The ITS definition of Rated Thermal Power includes only reactor core thermal power which is consistent with NUREG-1433, Rev 1. The ITS definition of Thermal Power is the same as the Rated Thermal Power without specifying the reactor power. There is no change to the reactor power of 2536 MWt. Therefore, this is an administrative change and is, therefore, acceptable.

covered by Item 4 as [old #26] and [old #29] (It is a duplicate entry)

(33) ITS Table 3.3.6.1-1 (DOC M14, JFD DB10):

The license proposed changes to the following Allowable Values:

(34) ITS Table 3.3.6.1-1 Function 3b, High Pressure Coolant Injection System Isolation HPCI Steam Supply Line Pressure - Low

(35) ITS Table 3.3.6.1-1 Function 4b, Reactor Core Isolation Cooling System Isolation RCIC Steam Supply Line Pressure - Low

This is not a beyond scope change since it was covered by an "A" DOC. An "A" DOC change is editorial in nature, thus it does not appear to meet the "beyond scope" classification.

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing the Allowable Value~~s~~ and Trip Setpoint~~s~~ ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

Covered by Item 4

Allowable Value for CTS Table 3.2-1, HPCI Steam Line Low Pressure from "100 > P > 50 psig" to "≥ 61 and ≤ 90 psig".

Allowable Value for CTS Table 3.2-1, RCIC Steam Line Low Pressure from "100 > P > 50 psig" to "≥ 60 and ≤ 90 psig".

The proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with Regulatory Guide (RG) 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation" which endorse ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

6 (~~36~~) ITS Surveillance Requirement 3.3.7.3.1 (DOC M1), Emergency Service Water System instrumentation Channel Calibration

AV is not in CTS

The licensee proposed to ~~change~~ set the Allowable Value, CTS Surveillance Requirement 4.11.D.1.e, Emergency Service Water Instrument Channel Calibration, as "≥ 40 psig and ≤ 50 psig."

The proposed allowable value has been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable value is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," ~~which endorse~~ ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable value was calculated by applying calibration based errors to the trip setpoint; thereby establishing an operability limit associated with the entire loop of the instrumentation function. The proposed allowable value change is within the analytical limit for the function and does not affect the existing margin between operating conditions and reactor trip setpoint. Therefore, the proposed allowable value change does not affect the existing licensing basis, and is, therefore, acceptable.

Insert AV

7 (~~37~~) ITS Table 3.3.8.1-1 (DOC L1):

The license proposed changes to the following Allowable Values:

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

(38) • ~~ITS Table 3.3.8.1-1~~ Function 1.a, 4.16 kV Emergency Bus Undervoltage (Loss of Voltage) Bus Undervoltage

Change Allowable Value, CTS Table 3.2-2, Item 22, 4kV Emergency Bus Undervoltage Relay (Loss of Voltage), from "85 ± 4.81 secondary volts" to "≥ 80.2 ~~V~~ and ≤ 89.8 ~~V~~."

(39) • ~~ITS Table 3.3.8.1-1~~ Function 1.b, 4.16 kV Emergency Bus Undervoltage (Loss of Voltage) Time Delay

Change Allowable Value, CTS Table 3.2-2, Item 23, 4kV Emergency Bus Undervoltage Timer (Loss of Voltage), from "2.50 ± 0.11 sec" to "≥ 2.4 seconds and ≤ 2.6 seconds."

(40) • ~~ITS Table 3.3.8.1-1~~ Function 2.a, 4.16 kV Emergency Bus Undervoltage (Degraded Voltage) Bus Undervoltage

Change Allowable Value, CTS Table 3.2-2, Item 19, 4kV Emergency Bus Undervoltage Relay (Degraded Voltage), from "110.6 ± 0.8 secondary volts" to "≥ 109.8 ~~V~~ and ≤ 111.4 ~~V~~."

(41) • ~~ITS Table 3.3.8.1-1~~ Function 2.b, 4.16 kV Emergency Bus Undervoltage (Degraded Voltage) Time Delay (LOCA)

Change Allowable Value, CTS Table 3.2-2, Item 20, 4kV Emergency Bus Undervoltage Timer (Degraded Voltage LOCA), from "8.96 ± 0.55 sec" to "≥ 8.4 seconds and ≤ 9.5 seconds."

(42) • ~~ITS Table 3.3.8.1-1~~ Function 2.c, 4.16 kV Emergency Bus Undervoltage (Degraded Voltage) Time Delay (non-LOCA)

Change Allowable Value, CTS Table 3.2-2, Item 21, 4kV Emergency Bus Undervoltage Timer (Degraded Voltage non-LOCA), from "43.8 ± 2.8 sec" to "≥ 41.0 seconds and ≤ 46.6 seconds."

The above proposed allowable values have been established consistent with the JAFNPP Engineering Standards Manual, IES-3A, "Instrument Loop Accuracy and Setpoint Calculation Methodology." The methodology used to determine the allowable values is consistent with the methodology described in ISA-S67.04-1994, Part I, "Setpoints for Nuclear Safety-Related Instrumentation." The licensee has not committed to being in compliance with RG 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," which endorses ISA-S67.04-1994, Part I with exceptions and clarifications. The licensee has provided a comparison of IES-3A with RG 1.105, Revision 3. In this comparison the licensee adequately addressed each of the RG 1.105 exceptions and clarifications.

The proposed allowable values were calculated by applying calibration based errors to the trip setpoints; thereby establishing an operability limit associated with the entire loop of each instrumentation function. The proposed allowable value changes are within the analytical limit for each function and do not affect the existing margins between operating conditions and reactor trip setpoints. Therefore, the proposed allowable value changes do not affect the existing licensing basis, and are, therefore, acceptable.

Insert AV

INSERT AV

Any changes to the safety analysis limits, applied in the methodologies, were evaluated and confirmed as ensuring safety analysis licensing acceptance limits are maintained. All design limits, applied in the methodologies, were confirmed as ensuring that applicable design requirements of the associated systems are maintained. The use of this methodology for establishing Allowable Values and Trip Setpoints ensures design or safety analysis limits are not exceeded in the event of transients or accidents and accounts for uncertainties and environmental conditions.

Covered by Item 7 (This is a duplicate entry)

(43) ITS Table 3.3.8.1-1 (DOC L1) Trip Level Setting for the LOP Instrumentation

The proposed change changes to the values of the degraded voltage and loss of voltage instrumentation specified in Table 3.2-2 of the JAFNPP CTS. In the proposed FitzPatrick ITS these values are specified in Table 3.3.8.1-1. This instrumentation is used to detect the loss or degradation of the offsite power system voltage to safety related electrical loads and begin the transfer those loads to the emergency diesel generators (EDGs). As such it is used to meet the FitzPatrick licensing basis requirements specified for the onsite electric power system.

Table 3.2-2, item numbers 19, 20, and 21, in the FitzPatrick CTS specify a degraded voltage trip level setting and associated time delays of 110.6 ± 0.8 secondary volts, 8.96 ± 0.55 seconds (LOCA), and 43.8 ± 2.8 seconds (non-LOCA) respectively. Item numbers 22 and 23 specify a loss of voltage trip level setting and time delay of 85 ± 4.81 secondary volts and 2.50 ± 0.11 seconds.

Table 3.3.8.1-1, item 1.a, in the proposed Fitzpatrick ITS specifies a loss of voltage allowable value ≤ 80.2 V and ≤89.8 V. The associated time delay specified in item 1.b is ≤ 2.4 seconds and ≤ 2.6 seconds. The degraded voltage allowable values are specified in items 2.a, 2.b, and 2.c. The item 2.a degraded voltage allowable value is ≤ 109.8 V and ≤ 111.4 V. The time delay in item 2.b is ≤ 8.4 seconds and ≤ 9.5 seconds (LOCA). The time delay in item 2.c is ≤ 41.0 seconds and ≤ 46.6 seconds (non-LOCA).

Comparison of the corresponding values in FitzPatrick CTS Table 3.2-2 and the proposed FitzPatrick ITS Table 3.3.8.1-1 indicates that they are essentially the same values except for some minor rounding in the proposed FitzPatrick ITS degraded voltage LOCA time delay (8.4 and 9.5 seconds compared to 8.41 and 9.51seconds), the loss of voltage value (80.2 V and 89.8 V as compared to 80.19 V and 89.81 V), and the loss of voltage time delay (2.4 seconds and 2.6 seconds as compared to 2.39 seconds and 2.61 seconds). The differences in these values are not significant relative to the particular function that they perform. The difference of only approximately -0.1 percent in the degraded voltage LOCA minimum time delay will not likely result in an increase of unwarranted separations from offsite power during a LOCA, and the change in the maximum time delay is conservative relative to protecting safety related equipment. The difference in the loss of voltage value voltage limits (approximately 0.01 percent) are very small and in a conservative direction for both protection of safety related equipment and unwarranted separations from offsite power. The difference in the loss of voltage time delay limits (approximately 0.4 percent) are also small and in a conservative direction for both protection of safety-related equipment and unwarranted separations from offsite power.

Based on the above review, the staff finds that the changes to the degraded voltage and loss of voltage values acceptable.

8

(~~44~~) ITS SR 3.3.8.2.3 (DOC M3, ~~JFD DB~~) Change of Allowable value

The proposed change involves changes to the allowable values of the Reactor Protection System (RPS) Electric Power Monitoring System. The RPS Electric Power Monitoring System is provided to isolate the RPS bus from the motor generator (MG) set or an alternate power supply in the event of overvoltage, undervoltage, or underfrequency. The RPS electric power monitoring System is necessary to meet the

Statement is unnecessary, plus it is incorrect (value is changing)

assumptions of the FitzPatrick safety analyses by ensuring that the equipment powered from the RPS buses can perform its intended function.

The overvoltage and underfrequency values specified for these power monitors are not being changed, nor are the values specified for the electric power monitors associated with the RPS MG set being changed. ~~JAFNPP~~ CTS 4.9.G.2 list the undervoltage value of the RPS alternate power source monitors as ≤108 V. The undervoltage value listed in ~~the proposed Fitzpatrick~~ ITS ~~surveillance~~ SR 3.3.8.2.3 is ≤109.9 V. The licensee's justification provided with this change states that the methodology used to determine this allowable value is consistent with the methodology discussed in ISA-S67.04 -1994, Part II, "Methodologies for Determination of Setpoints for Nuclear Safety-Related Instrumentation." The licensee also states that the proposed value will ensure the most limiting voltage requirement is met. ≥

Based on the above justification and the fact that the change has been made in a conservative direction, the staff finds this beyond scope change acceptable.

This is not a beyond scope change, plus it is incorrect. The ITS does not require operation of two RHR SDC loops. A&B it is not more restrictive than STS. The CTS does not have RHR SDC requirements. The ITS is adopted, except the one loop inoperation requirement.

(45) ITS 3.4.7 (DOC M1, JFD CLB1, PA1, PA2, PA3) RHR Shutdown Cooling

The proposed TS change requires operation of two RHR shutdown cooling loops in Mode-3 with reactor steam dome pressure less than the RHR cut in permissive pressure. This is more restrictive than the STS where operation of only one loop is required during special circumstances. The proposed SR 3.4.9.1 will require monitoring of RCS temperature every 30 minutes during RCS heatup and cooldown operations. This is accomplished by either any RHR shutdown cooling system in operation or recirculation pump in operation.

The licensee also proposed to delete the note in the STS which allows the removal of both shutdown cooling systems for up to 2 hours per 8 hour period. This is more restrictive than the STS and therefore is acceptable.

(46) 9

ITS 3.4.9 (DOC L2) RCS P/T Limits changes:

The CTS and STS, both require the temperature differential between the reactor coolant system and the reactor vessel bottom drain line be less than or equal to 145 °F during a recirculation loop startup. The requirement ensures that the differential temperature between the bottom head drain line and the reactor coolant is within limits which has been established to avoid a thermal overstress condition to the Control Rod Drive (CRD) stub tubes and in-core housing welds by sweeping hot water across these relatively cooler vessel structures and associated components. JAFNPP requests that ~~this requirement be optional instead of mandatory.~~ The temperature in the bottom head region is measured by monitoring the temperature of flow being drawn out from the bottom head drain line. JAFNPP also has experienced plugging of the bottom head drain line in the past. The change would avoid unnecessary plant shutdowns when the bottom drain line is plugged or if the drain line flow is low. ITS 3.4.9.4 provides an option to verify the recirculation flow to assure proper thermal mixing and thereby avoiding thermal overstress condition. In addition, General Electric (GE) has determined by testing and experiments that an alternate method to verify the differential temperature between the bottom head coolant temperature and the reactor pressure vessel (RPV) temperature is valid. GE has determined that two distinct operating conditions need to be considered to prevent excessive thermal stress of the lower head region of the RPV when a recirculation pump is started. In the first condition, when reactor coolant flow is greater than 40 percent of the rated value, there

an alternate method of verifying this temperature diffential is met be allowed.

will be sufficient mixing and turbulence to prevent significant stratification of cooler water in the bottom head region. In the second case, when flow is less than 40 percent of rated (for the limited time of 30 minutes), stratification of cooler water in the lower head region will be insufficient to be of concern with respect to thermal stress. Based on the analysis by GE, the staff agrees that stratification in the lower head region will not be a problem for short periods of operation below 40 percent of rated flow, and thus the proposed changes ~~are~~ is acceptable.

10 (~~47~~) ITS 3.5.1 (DOC ~~L5~~ L7) ECCS - Reduce HPCI and LPCI pump flow rates to SAFER/GESTER-LOCA flow rates

DOC L5 is related to Completion Times

The proposed changes involve a reduction of the high pressure coolant injection (HPCI) system and low pressure coolant injection (LPCI) system flow rates, of the emergency core cooling system (ECCS), from those specified in the originally approved CTS. The specific Technical Specification sections requested for NRC review and approval are; JAFNPP ~~Technical Specification section~~ CTS 4.5.C.1, "High Pressure Coolant Injection (HPCI)" system, and ~~section~~ CTS 4.5.A.3, "Low Pressure Coolant Injection (LPCI) system." The licensee for FitzPatrick proposes to decrease the HPCI flow rate from 4250 gpm to 3400 gpm and the LPCI flow rate from 8910 gpm to 7700 gpm. The basis for the reduction of the HPCI and LPCI flow rates is the new approved SAFER/GESTR-LOCA methodology used to show compliance to the 10CFR50.46 criteria for the design basis loss-of-coolant accident (LOCA). The licensee is requesting to use the HPCI and LPCI system flow rates that are an input to the SAFER/GESTR-LOCA analysis to show compliance to the 10CFR50.46 criteria using the 10CFR Part 50 Appendix K requirements. The original CTS value for the HPCI flow rate was 4250 gpm and for the LPCI flow rate was 8910 gpm. The proposed new flow rate values in the ISTS are decreased to 3400 gpm for the HPCI and 7700 gpm for the LPCI. These flow rates are used as input into the SAFER/GESTR-LOCA methodology to show acceptable ECCS performance for the design basis LOCA. The plant-specific LOCA analysis using the accepted SAFER/GESTR-LOCA methodology is presented in NEDO-31317P, Revision 2 ~~two~~, dated April 1993. This analysis was performed with NRC requirements and demonstrates conformance with the ECCS acceptance criteria of 10CFR50.46 and 10 CFR Part 50, Appendix K. The analysis evaluated a number of plant-specific break sizes to establish the behavior of the nominal and Appendix K peak cladding temperature (PCT) as a function of break size. Different single failures were also evaluated to identify the worst cases. The Licensing Basis PCT for JAFNPP is 1620 deg.F, which is below the PCT limit of 2200 deg.F. The calculated Upper Bound PCT for JAFNPP is 1510 deg.F, which is below the Upper Bound PCT limit of 1600 deg.F. With the verification that the Licensing Basis PCT is greater than the Upper Bound PCT for JAFNPP, the level of safety and conservatism of the plant-specific evaluation meets the NRC approved criteria. Therefore, the requirements of Appendix K are satisfied with the proposed lower flow rates and the proposed change ~~is~~ are acceptable.

duplicate of previous sentences

(48) ITS SR 3.5.3.3 (DOC M6, JFD CLB1), Testable Check Valves

The current CTS 4.5.E.1.e requires that the RCIC testable check valves be tested for operability following any period of reactor cold shutdown exceeding 48 hours if not performed during the preceding 92 days. This requirement is proposed to be replaced by ITS SR 3.5.3.3 which requires the test to be performed once each startup prior to exceeding 25 percent power. This requirement is not in the STS and the licensee wants to maintain the current check valve test requirement. The check valves need not be

Deleted in May 31 submittal

tested during cold shutdown. The valves need to be tested only during power operation. This is more restrictive than the current generic recommendation, and therefore is acceptable.

This is not a beyond scope change - it is consistent with STS allowance

(49) ITS SRs 3.5.3.5 and 3.5.3.6 (DOC M3) RCIC Flow Rate Test

The licensee proposed ITS SR 3.5.3.5 to change the pressure range for the periodic pump flow test (every 92 days) from 1195 psig -150 psig to 1040psig -970 psig. The recommended pressure range given is within the normal operating reactor pressure range. This is acceptable.

In licensee proposed ITS SR 3.5.3.6, the licensee proposes to separate the pump test at low reactor pressure from the test at high reactor pressure. The frequency of the test at low reactor pressure is changed from every 92 days to once in 24 months. Also, the test pressure is changed from 150 psig to 165 psig. These changes will ensure that the RCIC system is tested at both the high and low pressures at the proposed frequencies and is considered more restrictive on plant operation than the CTS but necessary to ensure RCIC remains operable over its full range. Therefore this change is acceptable.

Deleted in Oct. 18 submittal (Rev. I)

(50) ITS SR 3.6.1.1.1, (JFD CLB3, Bases JFD CLB4) Surveillance Requirement for Primary Containment

The proposed change revises to note in NUREG mark-up that LPCI and Core Spray air-operated testable check valve leakage test failure does not result in ITS SR 3.6.1.1.1 failure

This item is currently under staff review.

(51) ITS SR 3.6.1.1.1 (DOCs LA2, L3), Primary Containment Leakage Rate Testing Program

The proposed change deletes the current JAFNPP CTS 4.7.A.1. CTS 4.7.A.1 requires inspection of the accessible interior surfaces of the drywell and above the water line of the torus (suppression chamber) once every 24 months.

The licensee stated that the visual examination required by CTS 4.7.A.2.a (ITS surveillance requirement (SR) 3.6.1.1.1) duplicates the visual examination required by CTS 4.7.A.1 except for the frequency of the required examinations. CTS 4.7.A.2.a (ITS SR 3.6.1.1.1) is required by the Primary Containment Leakage Rate Testing Program, which is based on Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix J, Option B. It requires visual inspection be performed prior to each Type A test and two additional times during each 10-year interval. Thus, the CTS 4.7.A.2.a (ITS SR 3.6.1.1.1) requires visual examination be performed at least three times in each 10-year period while the CTS 4.7.A.1 required visual examination be performed five times in a 10-year period. The licensee stated that additional examinations are performed as required by the inservice inspection (ISI) program and every 5 years as required by the maintenance rule. The licensee further stated that the results of examinations conducted over more than 20 years of plant operation and through 14 refueling outages has shown that no significant deterioration has taken place.

Based on the above review and based on the requirements of 10 CFR 50.55a(ix), "Examination of metal containments and the liners of concrete containments", Section(E), requires a licensee to perform visual examination, as required by Subsection IWE, 3 times in a 10-year interval, which remains mandatory; the staff finds the proposed change to delete CTS 4.7.A.1 is inconsequential as far as containment visual examination is concerned, and that the additional examinations required by CTS 4.7.A.2.a (ITS SR 3.6.1.1.1) and the maintenance rule, as stated by the licensee, provide an added enhancement. Therefore, the proposed change is acceptable.

12 (~~52~~) ITS 3.6.1.3 (DOC L13, Bases JFD X13) Primary Containment Isolation Valves

The proposed change revises LPCI and CS testable check valve testing requirements to the per PCLRT Program.

This item is currently under staff review.

13 (~~53~~) ITS SR 3.6.1.7.1, SR 3.6.1.7.2, ITS Bases 3.6.1.7 (DOCs L1, L4, JFDs X3, CLB2), Suppression Chamber-to-Drywell Vacuum Breakers

The proposed change revises the frequency of performing a functional test of each required vacuum breaker from 31 days to a new schedule in accordance with the IST Program which is 92 days.

This is not part of change and does not justify extension. Not needed.

~~The licensee stated that the IST Program lists all valves required to be tested in accordance with American Society of Mechanical Engineers Section XI. In addition, the proposed ITS 5.5.7 requires the IST Program to be established, implemented and maintained. These controls are adequate to ensure the required tests are performed at the appropriate frequencies and changes to the requirement to the IST Program will be controlled by the provisions of 10 CFR 50.59.~~

The Frequency of CTS 4.7.A.5.a, which requires exercising each Suppression Chamber-to-Drywell vacuum breaker through an open-close cycle, is proposed to be extended from "monthly" to a frequency that is "In Accordance with the Inservice Testing (IST) Program" in the proposed IST SR 3.6.1.7.2. The licensee stated that at FitzPatrick, the vacuum breakers are not located in the harsh environment of the suppression chamber. The valves are located in the reactor building (secondary containment) where the environment is similar to that which exists for many primary and secondary containment isolation valves which are subjected to tests on a Frequency that is in accordance with the IST Program (92 days). In addition, similar SRs for the Reactor Building-to-Suppression Chamber vacuum breakers, which are of a similar design, have similar design functions, are also located in the reactor building, and are performed on a Frequency that is in accordance with the IST Program as stated in CTS 4.7.A.4.a (ITS SR 3.6.1.7.2). 6.

Stated

we did not "provide" data in DOC L4

The licensee provided in their DOC L4 a historical review of Suppression Chamber-to-Drywell vacuum breaker surveillance data that has been performed for the past 5 years and the data indicate there were no failures of the vacuum breakers to properly operate through a full open-close cycle operation. Therefore, based on (1) the valve reliability performance and (2) the longer test interval that has been approved for the similar Reactor Building-Suppression Chamber vacuum breakers and other valves located in areas with a similar environment (not a harsh environment), the staff finds the proposed

extension of the SR in the proposed ITS SR 3.6.1.7.2 from the current 31 days to a frequency that is "In accordance with Inservice Testing Program" (92 days) ~~Frequency~~ to be acceptable.

This is not a beyond scope. STS only requires 1 pump per loop, as stated in the STS Bases. This change only adds word "required" to the SR, consistent with use of the word in the STS. This change does not technically change SR, since LCO only requires 1 pump per loop (and SRs only have to be performed on equipment required to be operable.

(54) ITS 3.6.2.3.2 (JFD PA4) - Residual Heat Removal (RHR) Suppression Pool Cooling.

The proposed change revises ITS SR 3.6.2.3.2 by adding the word "required" to make it clearer that the Surveillance Requirement is applicable to only the single required RHR pump in a subsystem rather than both pumps in a subsystem that are provided by design. The licensee also added "required" to the Bases of SR 3.6.2.3.2 to clarify that all RHR pumps need not be tested under this SR. In response to the staff RAI, the licensee stated that only one RHR pump is needed to satisfy the operability requirements of an RHR subsystem and that one RHR subsystem is capable of maintaining the primary containment peak pressure and temperature below design limits. The licensee has further stated that "The RHR pumps are required to be tested by the IST program every 92 days", and there is no change in the RHR pump testing frequency or testing requirements under ITS SR 3.5.1.7. This is consistent with the JAFNPP licensing basis as described in the UFSAR. Hence the licensee's proposal to test only one RHR pump for suppression pool cooling as proposed in ITS SR 3.6.2.3.2 is acceptable.

(55) ITS 3.8.1 (DOC M5, JFD CBB6) AC Sources - Operating

The JAFNPP CTS 3.9.B.2 currently requires that from and after the time that incoming power is not available from any line or through either reserve station transformer, continued reactor operation is permissible for a period not to exceed 7 days, provided that both redundant emergency diesel generators systems are operable, all core and containment cooling systems are operable and the shutdown cooling systems are operable. At the end of the seventh day, if the condition still exists, the reactor shall be placed in a cold condition within 24 hours. In the proposed ITS 3.8.1, the licensee proposed to delete the requirement that cooling system must be operable, and add required Actions 'D1' and 'D2' in ITS 3.8.1. Also in the ITS, the licensee has proposed to keep the current 7-day Limiting Condition for Operation to restore both offsite circuits to operable status unchanged.

The staff reviewed the above information and concludes that the proposed change to add Required Action 'D1' addresses appropriate actions to be taken in the event of inoperability of redundant required features concurrent with inoperability of two reserve circuits. Required Action 'D1' reduces the need for a plant shutdown. The completion time for Required Action 'D1' is intended to allow the operator time to evaluate and repair any discovered inoperabilities. With both of the reserve circuits inoperable, sufficient onsite AC sources are available to maintain the plant in a safe shutdown condition in the event of a DBA or plant transient. Required Action 'D2' to ramp the reactor power level down to < 45% within 36 hours when two offsite power sources are inoperable is intended to reduce the consequences of any DBA or transient event by requiring a reduction in Thermal Power to < 45% RTP. The staff concurs with the licensee that the limit of < 45% RTP will ensure that sufficient power is available to support operating onsite loads and to help maintain stability of the 345 kV transmission network and thus maintain stability of the feedwater system by allowing both feedwater pumps to remain in service. The staff finds that the proposed Required Actions provide a reasonable balance to allow both sufficient time for repairs and to minimize the

deleted in May 31 submittal

consequences of design-basis accidents or plant transients. Therefore, the proposed TS change is acceptable.

(~~56~~ 14) ITS 3.8.4 (DOCs M2 and L~~6~~ 4) DC Sources - Operating

The JAFNPP CTS 3.9.E currently requires that during power operation, and if one battery becomes unavailable, repairs shall be made immediately, and continued reactor operation is permissible for a period not to exceed seven days total/calender-month provided that:

~~57~~. The other battery including its battery charger, and distribution systems is operable.

~~58~~. Pilot cell voltage, specific gravity, and overall voltage and temperature is measured immediately and daily thereafter for the operable battery.

~~59~~. The availability of the unaffected Emergency Diesel Generator System shall be demonstrated in accordance with Specification 4.9.B.5.

The CTS 3.9.E actions do not include a specific Action for an inoperable 125 V~~dc~~ battery charger. Therefore, if a 125 V~~dc~~ charger is inoperable, CTS 3.0.C must be entered and the plant must be in Cold Shutdown in 24 hours. The new ITS 3.8.4 (from previous TS 3.9.E) combines the inoperability of a charger with its associated battery, referred to as a 125 V~~dc~~ power subsystem.

The licensee has proposed to allow eight hours to restore the inoperable 125 V~~dc~~ power subsystem (i.e., inoperable battery, inoperable battery charger, or inoperable battery charger and the associate inoperable battery) to Operable status. The licensee stated that the 8-hour Completion Time has been selected because it allows sufficient time for operator assessment and action for restoring the division of 125 V~~dc~~ electrical power and also minimizes the time operating without a full compliment of equipment.

The staff reviewed the information provided by the licensee in its submittal and concludes that the proposed change to allow eight hours for the 125 V~~dc~~ power subsystem rather than seven days for an inoperable battery is more conservative and therefore acceptable.

4.0 COMMITMENTS RELIED UPON

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

5.0 LICENSE CONDITIONS

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

We believe this to be wording of license conditions we will submit. However, words here should match our future submittal.

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval ~~which~~ that begins on the date of implementation of this amendment.

- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

The staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule. The licensee's implementation date is April 1, 2002. This implementation schedule is acceptable.

Upon implementation of the ITS. However, relocations to the UFSAR shall be reflected in updates completed in accordance with 10 CFR 50.71(e).

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are provided in Table R, "Relocated Specifications" and in Table LA, "Removal of Details Matrix," ~~and described in Section 3.E above, "Relocated CTS Specifications."~~ The license condition states that the relocations ~~would~~ will be completed ~~no later than April 1, 2002, and the relocations to the JAFNPP UFSAR shall be completed in accordance with 10 CFR 50.71(e).~~ This schedule is acceptable.

— not necessary as 3.E only describes "R" not "LA"

Insert 5.0.a

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the ITS conversion amendment for JAFNPP. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on August 14, 2001 (66 FR 42683) for the proposed conversion of the CTS to ITS for JAFNPP. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

8.0 CONCLUSION

The JAFNPP ITS provides clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that the ITS for JAFNPP satisfy the guidance in the Final Policy Statement on TS improvements for nuclear power reactors with regard to the content of TS, and conform to the STS provided in NUREG-1433, Revision 1, or NUREG-1434,

INSERT 5.0.a

Finally, two license conditions are deleted because, for one, the requirements have been incorporated into the ITS, and for the second, the ITS does not require it to be located in the ITS; it is allowed to be relocated to plant controlled documents. License Condition 2.C.(4) required a program to be implemented that reduces leakage from the systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This license condition has been incorporated into ITS 5.5.2. License Condition 2.C.(5) required a program to be implemented that ensures the capability to accurately determine the airborne iodine concentration in areas vital to the mitigation of or recovery from an accident. This license condition has been relocated to the UFSAR.

Revision 1, with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed ITS for JAFNPP are acceptable.

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

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

Attachments:
1. List of Acronyms
2. Table A of Administrative Changes ~~to Current Technical Specifications~~
3. Table M of More Restrictive Changes ~~to Current Technical Specifications~~
4. Table L of Less Restrictive Changes ~~to Current Technical Specifications~~
5. Table LA of Removal of Details Matrix
6. Table R of Relocated Specifications ~~from Current Technical Specifications~~

5

Matrix

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List of Acronyms

AC	Air Conditioning or Alternating Current
ADS	Automatic Depressurization System
AOT	Allowed Outage Time
APLHGR	Average Planar Linear Heat Generation Rate
APRM	Average Power Range Monitor
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
ATWS-RPT	Anticipated Transient Without Scram - Recirculation Pump Trip
BPWS	Banked Position Withdrawal Sequence
BWR	Boiling Water Reactor
BWROG	Boiling Water Reactor Owners Group
CFR	Code of Federal Regulations
CFT	Channel Functional Test
COLR	Core Operating Limits Report
CRD	Control Rod Drive
CRDA	Control Rod Drop Accident
CREF	Control Room Envelope Filtration
CST	Condensate Storage Tank
CTS	Current Technical Specification
DBA	Design-Basis Accident
DC	Direct Current
DG	Diesel Generator
DOC	Discussion of Change (from the CTS)
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
EFCV	Excess Flow Check Valve
EOC-RPT	End of Cycle - Recirculation Pump Trip
EPA	Electrical Protection Assembly
ESF	Engineered Safeguard Feature
FR	Federal Register
FRTP	Fraction of Rated Thermal Power
GDC	General Design Criteria
GE	General Electric
HEPA	High Efficiency Particulate Air
HPCS	High Pressure Core Spray
Hz	Hertz
IRM	Intermediate Range Monitor
ISI	Inservice Inspection
ITS	Improved (converted) Technical Specifications
Kv	Kilovolt
kW	Kilowatt
LCO	Limiting Condition for Operation
LHGR	Linear Heat Generation Rate
LLS	Low-Low Set
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power
LPCI	Low Pressure Coolant Injection

LPCS	Low Pressure Core Spray
LPRM	Local Power Range Monitor
LSFT	Logic System Functional Test
MCPR	Minimum Critical Power Ratio
MFLPD	Maximum Fraction of Limiting Power Density
MG	Motor Generator
MSIV	Main Steam Isolation Valve
MWD/T	Megawatt Days/short Ton
NMP2	Nine Mile Point Unit 2
NUMAC	Nuclear Measurement Analysis and Control
OPDRV	Operation with a Potential for Draining the Reactor Vessel
PAM	Post-Accident Monitoring
P/T	Pressure/Temperature
QA	Quality Assurance
RAI	Request for Additional Information
RBM	Rod Block Monitor
RCS	Reactor Coolant System
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RSCS	Rod Sequence Control System
RTP	Rated Thermal Power
RWCU	Reactor Water Cleanup
RWM	Rod Worth Minimizer
SCIV	Secondary Containment Isolation Valve
SDC	Shutdown Cooling
SDM	Shutdown Margin
SDV	Scram Discharge Volume
SE	Safety Evaluation
SER	Safety Evaluation Report
SGT	Standby Gas Treatment
SLC	Standby Liquid Control
SR	Surveillance Requirement
SRM	Source Range Monitor
SRV	Safety/Relief Valve
SSER	Supplemental Safety Evaluation Report
STS	Improved Standard Technical Specification(s), NUREG-1433/4, Rev. 1
SW	Service Water
TRM	Technical Requirements Manual
TS	Technical Specifications
TSTF	Technical Specifications Task Force (re: generic changes to the STS)
UHS	Ultimate Heat Sink
UPS	Uninterruptible Power Supply
USAR	Updated Final Safety Analysis Report
V	Volt
VAC	Volts Alternating Current

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	1.0	1.0, 4.1.A footnote *, 4.2.A footnote *, RETS 1.0
A2	The CTS introductory note, which discusses the reasons for the Definitions, is replaced with a more specific "Note" in ITS Section 1.1, before the first definition.	1.0	1.0
A3	Deleted reportable event definition.	N/A	1.0.A
A4	The definition of Cold Condition has been incorporated into the MODES Table as MODE 4.	Table 1.1-1	1.0.C, 1.0.I.3.b
A5	Adds Sections 1.2, Logical Connector, 1.3, Completion Times, and 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.	1.2, 1.3, 1.4	N/A
A6	Deleted CTS definitions of Functional Test, Instrument Channel, Protective Action, Protective Function, Simulated Automatic Action, Sensor, Limiting Condition for Operation (LCO), Limiting Safety System Setting (LSSS), Reactor Vessel Pressure, Transition Boiling, Electrically Disarmed Control Rod, Rated Recirculation Flow, Top of Active Fuel, Rod Density, Purge-Purging, and Venting, and deletes RETS definitions of Instrument Channel Calibration, Instrument Channel Functional Test, Instrument Check, Logic System Functional Test, Member(s) of the Public, Off Gas Treatment System, Operable, Process Control Program (PCP), Rated Thermal Power, Solidification, Source Check, Treatment, and Unrestricted Area, since Specifications referring to them no longer contain their use, or no longer are retained in the FitzPatrick ITS.	N/A	1.0.F.1, 1.0.F.3, 1.0.F.8, 1.0.F.9, 1.0.F.11, 1.0.F.13, 1.0.G, 1.0.H, 1.0.P, 1.0.U.4, 1.0.V, 1.0.Y, 1.0.Z, 1.0.AA, 1.0.AB, and 1.0.AC; RETS 1.0.B, 1.0.C, 1.0.D, 1.0.E, 1.0.F, 1.0.G, 1.0.I, 1.0.J, 1.0.K, 1.0.M, 1.0.N, 1.0.O, and 1.0.P

Actuation

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	Revises the wording for the definition of Instrument Channel Calibration to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" actuation, alarm, or trip function, and conversely, some channels may have a "required" display function. Therefore, the word "required" has been included. In addition, specific CHANNEL CALIBRATION requirements for RTDs and thermocouples are added to the definition of Instrument Channel Calibration. Also, the definition of Instrument Channel Calibration has been modified to provide an allowance to perform the test "by means of any series of sequential, overlapping, or total channel step." (5)	CHANNEL CALIBRATION definition	1.0.F.2
A8	The phrase "or actual," in reference to the injected signal for the Instrument Channel Functional Test, has been added as an explicit option to the currently required simulated signal. Revises the wording for the definition of Instrument Channel Functional Test to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" alarm and/or initiating action, therefore, the word "required" has been included. Also, the definition of Instrument Channel Functional Test has been modified to provide an allowance to perform the test "by means of any series of sequential, overlapping, or total channel step." (5)	CHANNEL FUNCTIONAL TEST definition	1.0.F.5
A9	Revises the wording for the definition of LSFT to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" relay, contact, trip unit, or solid state logic element, and conversely, some channels may have a "required" display function. Therefore, the word "required" has been included.	LOGIC SYSTEM FUNCTIONAL TEST definition	1.0.F.7
A10	The MCPR and MFLPD definitions have been revised for clarity and for consistency with the ISTS wording.	MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY definitions	1.0.U.1, 1.0.U.2, and 1.0.U.3
A11	Modifies the definition of Operable to a) change the word "or" in reference to cooling or seal water to "and"; b) change the word "or" in reference to other auxiliary equipment to "and"; and c) changes the word "and" in reference to normal and emergency electrical power sources to "or". Currently, when one source is not available, the definition of Operable alone requires the supported features to be declared inoperable. However, CTS LCO 3.0.E allows the features to be considered Operable provided at least one source of power is still available and their redundant features are Operable. CTS LCO 3.0.E requirements are incorporated into ITS LCO 3.8.1 ACTIONS for when a diesel or offsite power source is inoperable.	OPERABLE-OPERABILITY definition	1.0.J
A12	Deletes the portion of the Rated Power definition that refers to a steady state nuclear steam supply output, since this is consistent with the license condition (the license condition refers to a specific reactor power level only).	RATED THERMAL POWER definition	1.0.N

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A13	Modifies the definition of Staggered Test Basis, allowing the minimum Surveillance interval to be specified in the Surveillance Requirements' Frequency column of the applicable LCOs, independent of the number of subsystems.	STAGGERED TEST BASIS definition	1.0.X
A14	The definitions of Primary Containment Isolation Actuation Instrumentation Response Time and RPS Response Time have been modified with an allowance to not measure the response times of certain components, provided that the components and methods for verification have been previously reviewed and approved by the NRC.	RPS RESPONSE TIME and ISOLATION INSTRUMENTATIO N RESPONSE TIME	1.0.F.6, 1.0.F.10, 4.1.A footnote *, 4.2.A footnote *
A15	Adds the definitions of ACTIONS, AVERAGE PLANAR LINEAR HEAT GENERATION RATE, LEAKAGE, LINEAR HEAT GENERATION RATE, SHUTDOWN MARGIN, THERMAL POWER, and TURBINE BYPASS SYSTEM RESPONSE TIME.	ACTIONS, AVERAGE PLANAR LINEAR HEAT GENERATION RATE, LEAKAGE, LINEAR HEAT GENERATION RATE, SHUTDOWN MARGIN, THERMAL POWER, TURBINE BYPASS SYSTEM RESPONSE TIME definitions	N/A
A16	The Primary Containment Isolation Actuation Instrumentation Response Time definition for the Main Steam Isolation Valves (MSIV) has been modified to address the ISOLATION INSTRUMENTATION RESPONSE TIME of all isolation valves.	ISOLATION INSTRUMENTATIO N RESPONSE TIME	1.0.F.6
A17	Adds the average reactor coolant temperature, the reactor vessel head closure bolt tensioning, and that fuel is in the vessel requirements to the definition of Mode.	MODE definition	1.0.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	The CTS does not permit entry into a MODE or other specified condition when an LCO is not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Exceptions to these requirements are stated in the individual specifications. The ITS rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. In addition, ITS LCO 3.0.4 states that the LCO is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.	LCO 3.0.4	3.0.D
A9	The CTS states that this LCO is an exception to LCO 3.0.B (ITS 3.0.2). The ITS includes these requirements and also adds clarifying words specifying that the exception to LCO 3.0.2 is for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY. This clarification eliminates any interpretations that may be required, and avoids any confusion.	LCO 3.0.5	3.0.F
A10	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate actions to be taken when a single inoperability (e.g., a support system) also results in the inoperability of one or more related systems (e.g., supported system(s)). The existing Technical Specifications and various NRC guidance documents have not provided a consistent approach to the combined support/supported inoperability.	LCO 3.0.6	N/A
A11	A requirement has been added to CTS 3.0.C that requires entry into LCO 3.0.3 when directed by the associated ACTIONS. This requirement is not included in the CTS since no specification explicitly directs entry into CTS 3.0.C. Since the ITS also uses this method of entry into LCO 3.0.3, this statement must be included. Changes to Specifications to explicitly require direct entry into LCO 3.0.3 (e.g., ITS 3.5.1) in the ITS if certain conditions are not met, are discussed in the Discussion of Changes for the specific Specification.	LCO 3.0.3	3.0.C
A12	The CTS does not permit entry into a MODE or other specified condition when an LCO's Surveillances have not been met within the applicable interval or as otherwise stated. The ITS rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. The ITS also adds the phrase "or that are part of a shutdown of the unit," for clarity such that the provisions of ITS SR 3.0.4 do not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with Actions or are part of a shutdown. In addition, the ITS states that the SR is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.	SR 3.0.4	4.0.D
A13	Not Used.	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.3.A.1
1 A2	The CTS and ITS SDM definitions requires a sufficient number of control rods to be Operable so that the core could be made subcritical in the most reactive condition during the operating cycle with the strongest control rod fully withdrawn and all other operable control rods fully inserted. The ITS 3.1.1 LCO has been editorially rewritten to require the Shutdown Margin (SDM) to be ≥ 0.38% Δk/k, with the highest worth control rod analytically determined.	LCO 3.1.1	3.3.A.1
	3.1.2, REACTIVITY ANOMALIES		
A1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.3.D, 3.3.E
A2	The CTS in part requires that if Reactivity Anomalies exceed the limit, the reactor will be shutdown "until the cause has been determined, and corrective actions have been taken as appropriate." These words have been deleted; however, the proposed deletion of these words will not change this requirement since the ITS requires that the plant be shutdown to MODE 3 within 84 hours of finding Core Reactivity differences not within limits, and the ability to change MODES is generically controlled by the provisions of LCO 3.0.4 which states in part that "when an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."	3.1.2 ACTIONS A and B, LCO 3.0.4	3.3.D
A3	The Frequency for the Reactivity Anomalies Surveillance of "During the Startup test program" has been deleted from the CTS since this test program has already occurred and will not be repeated again.	N/A	4.3.D
A4	CTS 4.3.D is revised to replace the term "reactivity monitoring" with "reactivity measuring." Core reactivity is a calculated value and is not displayed as a continuous readout, which is analogous to a "monitored" value. Rather core reactivity is "measured" by considering actual control rod densities and performing appropriate calculations.	SR 3.1.2.1	4.3.D
	3.1.3, CONTROL ROD OPERABILITY		

1. There is no CTS definition of SDM, and the ITS definition does not say this.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering. In addition, the ITS Control Rod Operability Specification explicitly includes all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion. The ITS also explicitly includes the following: a) All inoperable control rods (except stuck rods) are required to be fully inserted and disarmed; b) A control rod is considered "inoperable" and "stuck" if it is incapable of being inserted. Requirements are retained to preserve Shutdown Margin for this situation and the control rod is required to be disarmed; c) A control rod is considered "slow" when it is capable of providing the scram function, but may not be able to meet the assumed time limits. The scram reactivity used in the safety analysis allows for a specified number of slow rods. d) Special considerations are provided for non-conformance to the banked position withdrawal sequence (BPWS), due to inoperable control rods, at ≤ 10% of Rated Thermal Power. Also, ITS 3.1.3 Action Table Note, "Separate Condition entry is allowed for each control rod," and a Note to ITS 3.1.3 Required Action for Condition A and Required Action C, which allows for bypassing the RWM if necessary for continued operation, have been exclusively included.	3.1.3, 3.1.3 ACTIONS Note, 3.1.3 Condition A and Required Action C.1 Notes	3/4.3.A.2, 3/4.3.B.1, 3/4.3.B.2, 3/4.3.C.3 #
A2	The CTS requires that the plant can not be restarted after finding stuck control rods "unless (1) investigation has shown that the cause of the failure is not a failed control rod drive collet housing, and (2) adequate shutdown margin testing has been demonstrated as required by Specification 4.3.A. If investigation shows that the cause of the control rod failure is a cracked collet housing, or if this possibility cannot be ruled out, the reactor shall not be restarted until the affected control rod drive has been replaced or repaired." This requirement has been deleted since it is duplicative of the requirements of ITS LCO 3.0.4.	N/A	3.3.A.2.a
A3	The CTS requires that for stuck control rods a SDM test be performed "to demonstrate under this condition that the core can be made subcritical for any reactivity condition during the remainder of the operating cycle with the analytically determined, highest worth control rod capable of withdrawal, fully withdrawn, and all other control rods capable of insertion, fully inserted." The ITS requires SR 3.1.1.1 to be performed if a rod is withdrawn and can not be inserted (stuck). SR 3.1.1.1 is the proposed SDM test. In the proposed ITS, the definition for Shutdown Margin (SDM) requires in part that "all control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM." Therefore the present requirements of the CTS have been incorporated into the definition of SDM.	SR 3.1.1.1, definition of SDM	4.3.A.2.d
A4	The CTS LCO requirement that control rods be coupled to the drive is presented in ITS SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE.	SR 3.1.3.5	3.3.B.1
A5	The CTS LCO requires that control rods with scram times greater than those permitted in CTS 3.3.C.3 be declared inoperable. The requirement that maximum control rod scram insertion time to notch position 4 be ≤ 7 seconds is presented in ITS SR 3.1.3.4, making it a requirement for control rods to be considered Operable.	SR 3.1.3.4	3.3.A.2.c, 3.3.C.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The statement in CTS 3.3.B.1 that this requirement does not apply in the refuel condition when the reactor is vented, and that two control rods may be removed as long as Specification 3.3.A.1 is met, has been deleted since it duplicates an identical and more appropriately placed requirement in CTS 3.10.A.5 (ITS 3.10.6).	N/A	3.3.B.1
	3.1.4, CONTROL ROD SCRAM TIMES		
A1	Editorial changes, reformatting, and revised numbering.	3.1.4	3/4.3.C, 3.3.E
A2	CTS 4.3.C.1 requires the Rod Worth Minimizer (RWM) to be Operable during scram time testing when below 10% RTP. However, CTS 3.3.B.3 already requires the RWM to be Operable when in Startup or Run MODES and less than 10% RTP. Therefore, this requirement is duplicative of the requirement in ITS 3.3.2.1 and is deleted from ITS 3.1.4.	Table 3.3.2.1-1 Function 2 Applicability	4.3.C.1
A3	In CTS 3.3.C.3, the maximum insertion time is specified in terms of " 90% insertion". Scram times are measured from signals generated by switches corresponding to control rod notch positions. The proposed change will specify scram insertion time limits (in ITS Table 3.1.4-1 Note 2) in terms of "notch position" within a specified number of seconds. This terminology is consistent with the other scram time limits specified in CTS 3.3.C.1 and CTS 3.3.C.2.	Table 3.1.4-1 Note 2	3.3.C.3
	3.1.5, CONTROL ROD SCRAM ACCUMULATORS		
A1	Editorial changes, reformatting, and revised numbering.	3.1.5	3.3.A.2.d, 4.3.A.2.c
A2	The CTS requirement governing control rod drive (CRD) hydraulic control unit (HCU) accumulators is not associated with an Applicability statement governing when the accumulator and the associated rod must be Operable. However, the Applicability is assumed to be MODES 1 and 2 since the current default actions in CTS 3.3.A.2.e are to be in Hot Shutdown in 12 hours. Therefore, the ITS Applicability is MODES 1 and 2.	3.1.5	3.3.A.2.d
A3	A new Note has been added to the CTS ("Separate Condition entry is allowed for each control rod scram accumulator") to provide more explicit instructions for proper application for the new ACTIONS for Technical Specification compliance. In conjunction with ITS 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing ACTIONS for inoperable control rod accumulators.	3.1.5 ACTIONS Note	3.3.A.2.d

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.6, ROD PATTERN CONTROL		
A1	Editorial changes, reformatting, and revised numbering.	3.1.6	3.3.B.3.e, 3.3.B.3.f
A2	The CTS requires that if the requirements of BPWS can not be met, "the reactor shall not be restarted." This requirement has been deleted since it is duplicative of the requirements of ITS LCO 3.0.4.	N/A	3.3.B.3.f
	3.1.7, STANDBY LIQUID CONTROL SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.4
A2	CTS 3.4.C states that the solution temperature including the pump suction piping temperature has to be maintained above the temperature limits; however, CTS 4.4.C.2 only requires the solution temperature to be checked daily. The ITS has two separate surveillances, which require that both the temperature of the sodium pentaborate solution and the pump suction piping be verified every 24 hours. Since the intent of the CTS Surveillance is to check both locations, this change clarifies this intent.	SR 3.1.7.2, SR 3.1.7.3	3.4.C, 4.4.C.2
	3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.1.8	3.3.E, 4.3.A.2.b, 4.3.A.2.e, 4.3.C.3
A2	The requirement to fully cycle the scram discharge volume vent and drain valves is covered by two duplicate Surveillances in the CTS. The ITS combines these tests into one surveillance. In addition, since the 92 day surveillance frequency in one of the CTS requirements is consistent with the Inservice Testing Requirements, the ITS Frequency is "In accordance with the Inservice Testing Program".	SR 3.1.8.2	4.3.A.2.e, 4.3.C.3.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE		
A1	Editorial changes, reformatting, and revised numbering.	3.2.1	3/4.5.H
A2	CTS 3.5.H requires the APLHGR be within limits "during power operations." CTS 4.5.H only requires the limit to be checked when thermal power is ≥ 25% RTP. In addition, consistent with these requirements, if APLHGR is not restored to within limits when thermal power is ≥ 25% RTP, the current actions of CTS 3.5.H require power to be reduced to < 25% RTP. Therefore, the ITS Applicability for the APLHGR specification is "THERMAL POWER ≥ 25% RTP".	3.2.1 Applicability	3/4.5.H
A3	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the APLHGR is returned to within the prescribed limits". The phrase "or until the APLHGR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.5.H
	3.2.2, MINIMUM CRITICAL POWER RATIO		
A1	Editorial changes, reformatting, and revised numbering.	3.2.2	3.1.B, 4.1.C, 4.1.D
A2	CTS 3.1.B requires the MCPR be within limits of the COLR "during power operations." CTS 4.1.C only requires the limit to be checked when thermal power is ≥ 25% RTP. In addition, consistent with these requirements, if MCPR is not restored to within limits when thermal power is ≥ 25% RTP, the current actions of CTS 3.1.B require power to be reduced to < 25% RTP. Therefore, the ITS Applicability for the MCPR specification is "THERMAL POWER ≥ 25% RTP".	3.2.2 Applicability	3.1.B, 4.1.C
A3	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the MCPR is returned to within the prescribed limits". The phrase "or until the MCPR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.1.B
	3.2.3, LINEAR HEAT GENERATION RATE		
A1	Editorial changes, reformatting, and revised numbering.	3.2.3	3/4.5.I
A2	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the LHGR is returned to within the prescribed limits". The phrase "or until the LHGR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.5.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.4, APRM GAIN AND SETPOINT		
A1	Editorial changes, reformatting, and revised numbering.	3.2.4	4.1.B
A2	Notes are added that indicate the proper relationship with respect to when the SRs are required. These Notes provide clarification and do not change any technical requirement of the Specification.	SR 3.2.4.1 Note, SR 3.2.4.2 Note	4.1.B
A3	The CTS requires the determination of MFLPD on a daily basis during reactor power operation at greater ≥ 25% RTP. The APRM high flux scram settings must be adjusted if necessary as specified in the Core Operating Limits Report (COLR). ITS SR 3.2.4.1 will require the verification that MFLPD is within limits (consistent with LCO 3.2.4.a). ITS SR 3.2.4.2 requires the verification that each required APRM Neutron Flux — High (Flow Biased) Allowable Value specified in the COLR is made applicable (i.e., LCO 3.3.1.1, "Reactor Protection System Instrumentation," Function 2.b of Table 3.3.1.1-1 Allowable Value is reduced by the ratio of FRTP to MFLPD) or that each required APRM gain be adjusted as specified in the COLR (i.e., such that the APRM readings are ≥ 100% times MFLPD). This change clarifies the option to adjust the APRM gains instead of lowering the APRM Neutron Flux (Flow Biased) Allowable Value since this adjustment will equally compensate for any local flux peaking when any MFLPD is greater than the FRTP.	SR 3.2.4.1, SR 3.2.4.2	4.1.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.1.1	2.1.A.1.a, 2.1.A.1.b, 2.1.A.1.c, 2.1.A.2, 2.1.A.3, 2.1.A.4, 2.1.A.5, 2.2.1.A, 3/4.1.A, Tables 3.1-1, 4.1-1, and 4.1-2
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.1.1 ACTIONS Note	Table 3.1-1 Notes 1.a and 1.b
A3	The CTS Trip Level Settings (changed to Allowable Value) for the Mode Switch in Shutdown, Manual Scram, IRM Inoperative and APRM Inoperative Functions have been changed to NA in the ITS, since there are no Allowable Values.	Table 3.3.1.1-1 Allowable Values for Functions 1.b, 2.d, 10, and 11	Table 3.1-1 Trip Functions 1, 2, 4, and 8
A4	One of the optional actions for when an APRM Flow Referenced Neutron Flux channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is Mode 1. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A
A5	One of the optional actions for when an APRM Fixed High Neutron Flux channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is Mode 1. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A
A6	Not used.	N/A	N/A
A7	CTS Table 3.1-1 requires the High Reactor Pressure, High Drywell Pressure, and Reactor Low Water Level Functions to be Operable in the Refuel Mode. However, Note 7 to the Table effectively states that these Functions are not required to be Operable when the reactor is subcritical and the reactor water temperature is less than 212 degrees F. In addition, Note 9 states that the High Reactor Pressure is not required in the Refuel Mode when the reactor pressure vessel head is not bolted to the vessel, which is the normal condition during Refueling. Thus, in the ITS these three Functions are not required when in MODE 5.	N/A	Table 3.1-1, including Notes 7 and 9

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	CTS Table 3.1-1 Note 8 permits the High Drywell Pressure Function to be inoperable when primary containment integrity is not required in the Refuel and Startup Modes. Primary containment integrity in the ITS is always required when in MODE 2. Thus the ITS does not include the MODE 2 portion of this Note. In addition, the requirement for High Drywell Pressure Function in Refuel (MODE 5) has not been included as described in DOC A7 above. Therefore, the ITS does not include the MODE 5 portion of the Note.	N/A	Table 3.1-1 Note 8
A9	One of the optional actions for when a Turbine Control Valve Fast Closure or Turbine Stop Valve Closure channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is ≥ 29% RTP. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A
A10	The CTS states that functional tests and calibrations are not required on the part of the system that is not required to be operable or are tripped. If tests are missed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.1-1 Note 3, Table 4.1-2 Note 2
A11	Not used.	N/A	N/A
A12	The CTS specifies that the for certain channels instrumentation channel functional test will consist of injecting a simulated electrical signal into the instrument channels. This explicit allowance is not retained in the ITS since it is duplicative of the current and proposed CHANNEL FUNCTIONAL TEST definition.	CHANNEL FUNCTIONAL TEST definition	Table 4.1-1 Note 4
A13	Not used.	N/A	N/A
A14	The CTS specifies that Response Time Testing and conformance to the test acceptance criteria for the remaining channel components includes trip unit and relay logic. This requirement is not explicitly included in the ITS since the definition of RPS RESPONSE TIME and the Response Time SR ensure the proper testing is performed.	RPS RESPONSE TIME definition, SR 3.3.1.1.15	4.1.A footnote *
A15	The explicit requirement to perform a quarterly Functional Test of the High Water Level in Scram Discharge Instrument Volume Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.1-1 Functional Test requirement for Trip Function 14
A16	The CTS specifies that the Trip Level Setting (changed to Allowable Value) of the IRM High Flux Function is ≤ 96% of full scale. In the ITS, the Allowable Value for this Function is ≤ 120/125 divisions of full scale, which is equivalent to 96% of full scale.	Table 3.3.1.1-1 Function 1.a Allowable Value	Table 3.1-1 Trip Function 3 Trip Level Setting

(1) Added since change only affects some of the functions.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A17	The CTS specifies that a Functional test of the RPS Channel Test switches are required to be performed. However, a clarification is added that this test is to exercise the automatic scram contactors by either the RPS channel test switches or by performing a functional test of any automatic scram function. For clarity, the ITS requires performance of a functional test of the automatic scram contactors (DOC LA9 justifies relocation of methods to perform the functional test).	SR 3.3.1.1.4	Table 4.1-1 Trip Function 3 Functional Test Frequency, including Note 1
A18	The CTS specifies that the APRM Flow Referenced Neutron Flux Scram Trip Setting shall be adjusted during single loop operation when required by Specification 3.5.J (The actual requirement is specified in CTS 3.5.K). This cross reference is not included in the ITS since it is redundant to the requirements in CTS 3.5.K (and maintained in the ITS).	N/A	2.1.A.1.c(1)
A19	The CTS "Trip Level Setting" and "limiting safety system trip settings" are changed to "Allowable Value" in the ITS, since the CTS trip level settings and limiting safety system trip settings are considered Allowable Values.	Table 3.3.1.1-1 Allowable Values	Table 3.1-1 Trip Level Setting, 2.1.A limiting safety system trip settings
A20	The CTS does not have a specific CHANNEL CALIBRATION requirement for the APRM and IRM RPS Functions. However, the CTS does have a 92 day CHANNEL CALIBRATION requirement for the APRM and IRM Control Rod Block Functions. Therefore, consistent with this CTS requirement and with current practice, a Surveillance Requirement is included as ITS SR 3.3.1.1.9 to perform a CHANNEL CALIBRATION on IRM Functon 1.a and APRM Functions 2.a, 2.b, and 2.c every 92 days.	SR 3.3.1.1.9	Table 4.2-3 Instrument ~~Channels~~ Calibration Test for Functions 1, 2, 3, and 4
	3.3.1.2, SRM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.3.B.4, 3/4.10.B
A2	The CTS requirement for SRM response of 3 cps is based on a signal to noise ratio of ≥ 3:1. For clarity, the signal to noise ratio is specified in the ITS.	SR 3.3.1.2.4	4.3.B.4
A3	The CTS does not have a specific CHANNEL CALIBRATION requirement for the SRM indication. However, the CTS does have a 92 day CHANNEL CALIBRATION for the MODE 2 SRM Control Rod Block Function. Therefore, consistent with this CTS requirement and with current practice, a Surveillance Requirement is included as ITS SR 3.3.1.2.7 to perform a CHANNEL CALIBRATION every 92 days.	SR 3.3.1.2.7	Table 4.2-3 Instrument ~~Channels~~ Calibration Test for Function 8

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	2.1.A.1.d, 3/4.2.C, Tables 3.2-3 and 4.2-3, 3/4.3.B.3, 3/4.3.B.5
A2	The requirements of the Rod Worth Minimizer (RWM) have been moved from a separate Specification in the CTS to the ITS Control Rod Block Specification.	3.3.2.1	3/4.3.B.3
A3	Not used.	N/A	N/A
A4	The explicit requirement to perform a quarterly Functional Test of the RBM - Upscale and RBM - Downscale Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST. In addition, the CTS Note that is associated with the channel functional test (This instrument is exempt...) is deleted from the CTS since the CHANNEL FUNCTIONAL TEST is not required to be performed.	CHANNEL CALIBRATION definition	Table 4.2-3 Instrument Functional Test requirement for Functions 6 and 7, including Note 5
A5	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-3 Note 4
(1) A6	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the (1) RETS functions appropriately discuss the requirements.	N/A	3/4.D
Insert line	3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.2.F, Tables 3.2-6 and 4.2-6
A2	The CTS provides the option of either restoring the inoperable instrument channel to operable status or placing the inoperable channel in the tripped condition when there is one of the required feedwater pump turbine and main turbine trip instruments is inoperable. The ITS does not include the option to restore the inoperable channel to Operable status, since the option of restoring inoperable instruments to an operable status is always permitted in the Technical Specifications.	N/A	Table 3.2-6 Note 1a

(1) There is NO ITS RETS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The CTS Table Instrument Functional Test is not applicable to any of the PAM instrumentation retained in the ITS (as indicated by "N/A" in the CTS). Therefore, the Instrument Functional Test requirement is not included in the ITS.	N/A	Table 4.2-8
3.3.3.2, REMOTE SHUTDOWN SYSTEM			
A1	Editorial changes, reformatting, and revised numbering.	3.3.3.2	3/4.2.J, Table 3.2-10
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.2 ACTIONS Note 2	3.2.J.2, 3.2.J.3
A3	Not used.	N/A	N/A
A4	The CTS requires a channel check on all the required instrument channels (not control switches). The ITS requires a CHANNEL CHECK for each required instrument channel that is normally energized, since no specific acceptance criteria would apply to the CHANNEL CHECK if an instrument channel were de-energized (since the instruments would not be indicating). However, this change does not modify any current requirements since all the existing channels are either energized or are a directly reading parameter.	SR 3.3.3.2.1	Table 3.2-10
3.3.4.1, ATWS-RPT INSTRUMENTATION			
A1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.2.G, Tables 3.2-7 and 4.2-7
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.1 ACTIONS Note	Table 3.2-7 Note 1
A3	Not used.	N/A	N/A
A4	Not used.	N/A	N/A
A5	Not used.	N/A	N/A
A6	CTS Table 3.2-7 Footnote ** provides guidance in applying the Required Actions of CTS Table 3.2-7 Note 1.b. This Footnote is not retained in the ITS.	N/A	Table 3.2-7 Footnote **

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.4.1.4	Table 3.2-7 Trip Level Setting
A8	The CTS specifies that the limiting condition for operation for the instrumentation that provide a recirculation pump trip are given in Table 3.2-7 and requires the recirculation pump trip instrumentation to be functionally tested, calibrated, and logic tested in accordance with CTS Table 4.2-7. This cross-reference to the Tables has been deleted since the ITS does not include a Table. All of the technical requirements of the CTS Tables are included in the ITS LCO and Surveillances.	3.3.4.1	3/4.2.G
A9	The CTS ATWS Reactor Pressure - High Setpoint is modified according to the number of S/RVs that are out of service. The ITS maintains this modification, however, it has been clarified to identify the actual number of Operable S/RVs, in lieu of the CTS identification of the number of inoperable S/RVs.	SR 3.3.4.1.4	Table 3.2-7 Note 3
	3.3.5.1, ECCS INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.2.B, Tables 3.2-2 and 4.2-2, 4.5.A.1.f, 4.5.A.3
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.1 ACTIONS Note	Table 3.2-2 Notes 1 through 9
A3	The ITS includes an ACTION that directs entry into the appropriate Conditions referenced in ITS Table 3.3.5.1-1 when one or more channels are inoperable. The ACTION has been added since not all Functions have the same ACTIONS.	3.3.5.1 ACTION A	N/A
A4	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the RETS functions appropriately discuss the requirements.	N/A	3/4.2.D
A5	The CTS includes a note that states "This instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel." This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.2-2 Note 5
A6	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-2 Note 4

1. There is no ITS RETS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A14	The CTS divides the Surveillance Requirements for Drywell Pressure and Reactor Pressure Functions as non-Analog Transmitter Trip System (ATTS) components and ATTS components. The ITS does not specify this explicitly in the ITS Table as each of the Functions are listed separately along with the associated Surveillance Requirements.	Table 3.3.5.1-1 Functions 1.b, 2.b, 2.h, and 3.b	Table 4.2-2 Instrument Channels 2a) and 2b)
A15	The CTS requirement that a calibration of the timers is included in the LSFT has been deleted, since it is duplicative of the CTS requirement (and maintained in the ITS) to perform a Channel Calibration of the timers.	N/A	Table 4.2-2 Note 9
A16	The CTS specifies that the Condensate Storage Tank Low Level setting must be ≥ 59.5 inches above the tank bottom. The ITS does not specify the reference point since it is implied by the associated name of the Function (Condensate Storage Tank Level). In addition, the CTS specifies that the Suppression Pool High Level setting must be ≤ 6 inches above normal level, with the normal Suppression Pool Water Level, as specified in CTS 3.7.A.1, being from 13.88 to 14.00 feet. The ITS is clarified to specifically state the Allowable Value as ≤ 14.5 feet, consistent with the CTS.	Table 3.3.5.1-1 Functions 3.d and 3.e	Table 3.2-2 Item No. 17 and 18
	3.3.5.2, RCIC SYSTEM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.2.B, Tables 3.2-2 and 4.2-2, 4.5.E.1.f
A2	CTS 3.2.B requires the RCIC System instrumentation to be Operable whenever the RCIC System is required to be operable as specified in CTS 3.5. In the ITS, the Applicability is specifically stated as MODES 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, in lieu of referencing the RCIC System Specification. The ITS Applicability is consistent with the CTS system Applicability.	3.3.5.2	3.2.B
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.2 ACTIONS Note	Table 3.2-2 Notes 1, 4, and 9
A4	The ITS includes an ACTION that directs entry into the appropriate Conditions referenced in ITS Table 3.3.5.1-1 when one or more channels are inoperable. The ACTION has been added since not all Functions have the same ACTIONS.	3.3.5.2 ACTION A	N/A
A5	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-2 Note 4

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The CTS includes a note that states "This instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel." This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.2-2 Note 5
A7	The explicit requirement to perform a quarterly Functional Test of the RCIC Suction Source Level Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-2 Functional Test requirement for Instrument Channel 6
A8	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the ITS RETS ~~functions~~ appropriately discuss the requirements.	N/A	3/4.2.D
A9	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.5.2-1 Allowable Value	Table 3.2-2 Trip Level Setting
A10	The CTS specifies that the Condensate Storage Tank Low Level setting must be ≥ 59.5 inches above the tank bottom. The ITS does not specify the reference point since it is implied by the associated name of the Function (Condensate Storage Tank Level).	Table 3.3.5.2-1 Function 3	Table 3.2-2 Item No. 16
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION			
A1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	1.2.2, 2.1.A.8, 2.2.2, 3/4.2.A, Tables 3.2-1, 3.2-2, 3.2-8, 4.1-1, 4.1-2, 4.2-1, 4.2-2, and 4.2-8
A2	The CTS specifies that Response Time Testing and conformance to the test acceptance criteria for the remaining channel components includes trip unit and relay logic. This requirement is not explicitly included in the ITS since the definition of RPS RESPONSE TIME and the Response Time SR ensure the proper testing is performed.	ISOLATION INSTRUMENTATIO N RESPONSE TIME definition, SR 3.3.6.1.8	4.2.A note *

1. There is NO ITS RETS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.6.1 ACTIONS Note 2	Table 3.2-1 Notes 1, 2, and 3, Table 3.2-8 Note A
A4	The CTS provides the option of either restoring the inoperable instrument channel to operable status or placing the inoperable channel in the tripped condition when there are two required instruments of a Trip Function inoperable. The ITS does not include the option to restore the inoperable channel to Operable status, since the option of restoring inoperable instruments to an operable status is always permitted in the Technical Specifications.	N/A	Table 3.2-1 Note 1.b.3)
A5	The CTS Note that allows 6 hours to perform a surveillance for those functions utilizing a two-out-of-two taken once logic has been clarified in the ITS by identifying the actual Functions involved (e.g., ITS table 3.3.6.1 Functions 2.d and 2.g).	3.3.6.1 SR Note 2	Table 3.2-1 Note 2.a
A6	The requirement in the CTS to declare the affected system inoperable when the penetration is isolated is an unnecessary reminder that other Technical Specifications may be affected. This is essentially a "cross reference" between Technical Specifications and has not been included in the ITS.	N/A	Table 3.2-1 Note 3.F
A7	The Reactor Water Cleanup (RWC) System, High Pressure Coolant Injection (HPCI) Steam Line, and Reactor Core Isolation Cooling System (RCIC) Steam Line Area Temperature Functions specified in CTS Table 3.2-1 have been separated to indicate the actual areas in which the channels are designed to monitor.	Table 3.3.6.1-1 Functions 3.d, 3.e, 3.f, 3.g, 3.h, 3.i, 4.d, 4.e, 4.f, 5.a, 5.b, and 5.c)	Table 3.2-1 Trip Functions 11, 16, and 20
A8	The explicit requirement to perform a quarterly Functional Test of the SDC Reactor High Pressure, RWCU Area High Temperature, Main Steam Tunnel High Radiation, and HPCI/RCIC High Exhaust Diaphragm Pressure Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-1 Functional Test for Instrument Channels 1, 6, 8, and 12
A9	The CTS states that instrument checks, instrument functional tests, and calibration tests are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.1-1 Note 3, Table 4.1-2 Note 2,Table 4.2-1 Note 4
A10	The CTS includes notes that state that this instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel. This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.1-1 Note 4, Table 4.2-1 Note 5

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A9	The CTS Note requirement that "there shall be two operable or tripped trip systems for each Trip Function, except as provided below" has been deleted since the other CTS Notes provide sufficient guidance to take when channels are inoperable. In the ITS, the requirements in ITS Table 3.3.6.2-1 and the ACTIONS clearly define the appropriate requirements when channels are inoperable in the ITS.	N/A	Table 3.2-1 Note 1
A10	The RETS requires the Standby Gas Treatment (SGT) System ~~exhaust monitor~~ actuation instrumentation to be Operable to support the SGT System and the CTS requires the SGT System to be Operable whenever secondary containment integrity is required. In the ITS, the reference to the SGT System Specification is not used; the actual MODES and other specified conditions are specified, consistent with the Applicability in the ITS SGT System Specification.	Table 3.3.6.2-1 Functions 3 and 4 Applicability	RETS Table 3.10-1
A11	CTS RETS Table 3.10-1 Note (c) requires to stop handling the refueling equipment or Note (d) requires the isolation of the Secondary Containment and to start the Standby Gas Treatment (SGT) System when the requirements for the Refuel Area Exhaust Monitor are not met. The option to only stop handling the refueling equipment is not retained in the ITS since it does not provide adequate protection during all MODES of plant operation. If operating in MODE 1, stopping this operation (stop handling the refueling equipment) will not provide sufficient protection for all postulated events during power operation. The requirement that this equipment must be Operable during handling the refueling equipment is retained in the Applicability of ITS 3.3.6.2-1, Footnote b, consistent with the current Applicability requirements in CTS RETS 3.8 (see A10). ITS Table 3.3.6.2-1 requires this Function to be Operable during MODES 1, 2 and 3 and Footnote b requires this Function to be Operable during CORE ALTERATIONS and during movement of irradiated fuel assemblies in secondary containment. Therefore, the proposed Applicability will ensure the equipment is Operable during the conditions of postulated events. In addition, the ITS 3.3.6.2 ACTIONS will provide adequate compensatory actions when this instrumentation is inoperable. Changes to the actions in CTS RETS Table 3.10-1 Note (d) are discussed in M3 and L4, therefore, this change is considered administrative.	N/A	RETS Table 3.10-1 Note c
A12	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.6.2-1 Allowable Value	Table 3.2-1 Trip Level Setting
A13	The RETS details identifying how the Logic System Functional Test is to be performed (i.e., where possible using test jacks) has been deleted since it is duplicative of the ITS definition for Logic System Functional Test.	LOGIC SYSTEM FUNCTIONAL TEST definition	RETS Table 3.10-2 Note f
3.3.7.1, CREVAS SYSTEM INSTRUMENTATION			

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.7.2	Tables 3.2-1 and 4.2-1, RETS 3.9, RETS Tables 3.10-1 and 3.10-2
A2	The requirement in CTS RETS 3.9.b to isolate the vacuum pump (or air removal pump) when the limits of CTS RETS Table 3.10-1 have been exceeded has been deleted since the associated actions for the Main Steam ~~Tunnel~~ Line Radiation — High Function in CTS RETS Table 3.10-1 Note (h) along with its reference to CTS Appendix A Table 3.2-1 provide the appropriate actions.	N/A	RETS 3.9.b
A3	The Table presentation of the LCO requirements has been changed such that the ITS does not use Tables; the ITS LCO statement includes the CTS LCO requirements from the Tables.	LCO 3.3.7.2	Table 3.2-1, RETS Table 3.10-1
A4	The RETS cross-reference to the Actions in Table 3.2-1 has been deleted, since the actions for the air removal pump are all in one ITS Specification.	N/A	RETS Table 3.10-1 Note h
A5	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.7.2 ACTIONS Note	CTS Table 3.2-1 Notes 1 and 3.E, RETS Table 3.10-1 Note h
A6	The CTS reference to those trip functions which are not common to RPS has been deleted since the Main Steam ~~Tunnel~~ Line Radiation — High Function is not common to RPS.	N/A	Table 3.2-1 Notes 1.a.2 and 1.b.3.b)
A7	The CTS term PCIS initiation capability has been changed to condenser air removal pump isolation capability in the ITS since this Specification is concerning the condenser air removal pump isolation.	Surveillance Requirements Note	Table 3.2-1 Note 2.b
A8	The explicit requirement to perform a quarterly Functional Test of the Main Steam ~~Tunnel~~ Line Radiation - High Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-1 instrument functional test for instrument channel 8

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A9	The RETS cross-reference to the Surveillances in Table 4.2-1 has been deleted, since the Surveillances for the air removal pump are all in one ITS Specification.	N/A	RETS Table 3.10-2 Note g
A10	The RETS requirement that a calibration of the timers is included in the LSFT has been deleted, since the Main Steam Tunnel Radiation - High Function does not include any time delay relays or timers.	N/A	RETS Table 3.10-2 Note h
A11	The CTS Note requirement that "there shall be two operable or tripped trip systems for each Trip Function, except as provided below" has been deleted since the ITS requirements in the ITS LCO and the ACTIONS clearly define the appropriate requirements when channels are inoperable in the ITS.	N/A	Table 3.2-1 Note 1
A12	The ITS includes a Note to preclude placing the channel in trip if the associated isolation valve is inoperable. This clarification has been made since there is no system specification for the condenser air removal pump isolation valves and therefore the appropriate ACTIONS associated with valve inoperabilities are included in this Specification.	3.3.7.2 Required Action A.2 Note	N/A
A13	The RETS cross-reference to the Surveillances in RETS Table 3.10-2 has been deleted, since the Surveillances for the air removal pump are all in one ITS Specification.	N/A	RETS 3.9
A14	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.7.2.2	Table 3.2-1 Trip Level Setting
A15	The ITS is clarified by a Note that excludes the calibration of the radiation detectors associated with the Main Steam Line Radiation — High Function during the quarterly test (once every 3 months). This is consistent with the CTS, since the current requirements only require an instrument channel alignment (CHANNEL CALIBRATION) every 3 months using a current source, this implies the radiation detector is excluded from this Surveillance.	SR 3.3.7.2.2 Note	Table 4.2-1 Note 11
	3.3.7.3, ESW SYSTEM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.7.3	3/4.11.D
A2	The CTS includes both instrumentation and the system components of the ESW System in one Specification. The ITS splits the requirements into two Specifications, one for the instrumentation and one for the system. Therefore, a specific ITS LCO statement has been provided for the instrumentation.	LCO 3.3.7.3	3/4.11.D
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.7.3 ACTIONS Note	3.11.D

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.8.1, LOP INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3.2.I, Tables 3.2-2 and 4.2-2
A2	Not used.	N/A	N/A
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.8.1 ACTIONS Note	Table 3.2-2 Note 10
A4	The CTS requires a "Minimum No. of Operable Instrument Channels Per Trip System." The ITS clarifies this by using the term "Required Channels Per Bus." This specifies the number of channels required to be Operable to ensure an EDG subsystem or EDG will start when required. In addition, the CTS Table column "Total Number of Instrument Channels Provided by Design for Both Trip Systems" has been deleted since only one trip system exist for each emergency bus.	Table 3.3.8.1-1	Table 3.2-2
A5	The ITS includes a Note to clarify which SRs are required to be performed on each of the LOP instrument Functions.	Surveillance Requirements Note 1	Table 4.2-2
A6	The explicit requirement to perform a quarterly Functional Test of the 4 kV Emergency Bus Under Voltage Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-2 instrument functional test requirement for instrument channel 7
	3.3.8.2, RPS ELECTRIC POWER MONITORING		
A1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.9.G
A2	The CTS provides the option of either restoring the inoperable monitoring assembly to Operable status or removing the associated RPS power supply from service when an assembly is inoperable. The ITS does not include the option to restore the inoperable assembly to Operable status, since the option of restoring inoperable assembly to an operable status is always permitted in the Technical Specifications.	N/A	3.9.G.1, 3.9.G.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, RECIRCULATION LOOPS OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.4.1	3.5.J, 3.5.K
A2	Although not stated in the CTS, Thermal Hydraulic Stability applies for both two loop and single loop operation. This clarification is reflected in the ITS LCO, which requires operations to be outside the "Exclusion Region" of the power-to-flow map in both two loop and one loop operation, and in the associated Action.	LCO 3.4.1, 3.4.1 ACTION A	3.5.J.1.a
A3	The CTS 3.5.K.1 cross-reference to CTS 1.1.A has been deleted since the proposed Safety Limit is applicable at all times. As currently written, the safety limit would not be required to be met for up to 8 hours after a single loop is in service. This is not the intent and would not be utilized in this manner. In addition, the CTS 3.5.K.1 cross-reference to the APRM Flow Referenced Neutron Flux control rod block in CTS 2.1.A and in 3.2.C have been deleted since the function has been relocated from the Technical Specifications (see DOCs for LCO 3.3.2.1).	N/A	3.5.K.1
	3.4.2, JET PUMPS		
A1	Editorial changes, reformatting, and revised numbering.	3.4.2	3/4.6.G
A2	The wording in the CTS was changed to require verification that one of the criteria be met, rather than require verification that none of the conditions exist simultaneously.	SR 3.4.2.1	4.6.G, 4.6.G.A.b
A3	The CTS places requirements on individual jet pump differential pressure variation from the average of all jet pump differential pressures. The ITS places requirements on individual jet pump differential pressure variation from established patterns. This change is consistent with the recommendations provided in General Electric Service Information Letter (SIL) No. 330, Jet Pump Beam Cracks," and NUREG/CR-3052, "Closeout of IE Bulletin 80-07: BWR Jet Pump Assembly Failure." Since the jet pump diffuser to lower plenum differential pressure or relationship of one jet pump to the loop average is repeatable, both methods of comparison are considered equivalent.	SR 3.4.2.1	4.6.G.3
	3.4.3, SAFETY/RELIEF VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.6.E, 2.2.1.B

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS Applicability is "during reactor power operating conditions and prior to startup from a cold condition, or whenever reactor coolant pressure is greater than atmosphere and temperature greater than 212°F." The CTS Applicability of "during reactor power operating conditions," and "whenever reactor coolant pressure is greater than atmosphere and temperature greater than 212°F," are encompassed by the ITS MODES of Applicability (MODES 1, 2, and 3). The CTS Applicability, "prior to startup from a cold condition," is consistent with CTS 3.0.D and ITS LCO 3.0.4, which require that an LCO be met prior to entry into the MODE or other specified condition in the Applicability, and therefore are not required to be specified in ITS 3.4.3.	3.4.3 Applicability	3.6.E.1
A3	CTS 3.6.E.1 specifies that the Automatic Depressurization System (ADS) valves shall be OPERABLE as required by CTS 3.5.D. This statement is a cross-reference that another Specification is also Applicable, and is not necessary to be in the ITS.	N/A	3.6.E.1
A4	The CTS is revised to reflect that only each "required" S/RV need be manually opened, since the CTS states that only 9 of 11 S/RVs are required to be OPERABLE.	SR 3.4.3.2	4.6.E.4
A5	Not used.	N/A	N/A
	3.4.4, RCS OPERATIONAL LEAKAGE		
A1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.6.D
A2	The requirement to record the reactor coolant leakage rate is not included in the ITS, since this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records).	N/A	4.6.D.1
	3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.2.E, 3/4.6.D.4
A2	The CTS specifies that the limiting conditions for operation for the instrumentation that monitors drywell leak detection are given in CTS Table 3.2-5. The ITS LCO explicitly specifies the RCS leakage detection instrumentation required to be Operable (i.e., Drywell Drain Sump Monitoring System, one channel of the drywell continuous atmospheric particulate system, and one channel of the drywell atmospheric gaseous continuous system; a Table is not used in the ITS. Therefore, this change deletes a cross reference to a Table which is not included in the ITS. Similarly, reference to CTS Table 4.2-5 has been deleted since in the ITS, a specific table is not used.	3.4.5	3.2.E, 4.2.E

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	CTS Table 3.2-5 Note 2, which refers to another Specification (CTS 3.6.D) for the associated Action requirements, does not need not be repeated in the ITS since the associated actions of this Specification have been incorporated in ITS 3.4.5.	N/A	Table 3.2-5 Note 2
A4	CTS Table 4.2-5 Note 4, states that instrument checks are not required when these instruments are not required to be operable or are tripped. This Note is not included in the ITS because the Surveillances to which the Note applies have been deleted and also because there is no trip position for this instrumentation.	N/A	Table 4.2-5 Note 4
A5	The Instrument Functional Test Frequency of the Floor Drain Sump Flow Integrator identified in Note 1 to Table 4.2-5 has been simplified to once every 31 days. The allowance to be able to change the surveillance frequency by submitting failure rate data to the NRC is always an option and is not necessary for inclusion in the ITS.	SR 3.4.5.2	Table 4.2-5 Note 1
3.4.6, RCS SPECIFIC ACTIVITY			
A1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.6.C
A2	The requirement in CTS 4.6.1.b to perform an isotopic analysis of a sample of reactor coolant has been reworded to match the current wording in CTS 3.6.C.1. ITS SR 3.4.6.1 will require the verification that the reactor coolant DOSE EQUIVALENT I-131 specific activity is ≤ 0.2 μCi/gm.	SR 3.4.6.1	4.6.C.1.b
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN			
NONE	NONE	NONE	NONE
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN			
NONE	NONE	NONE	NONE
3.4.9, RCS P/T LIMITS			
A1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.6.A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS does not state any Applicability requirements. However, the limitations imposed by the CTS apply at all times, therefore, it can be implied that the Specification is also Applicable "At all times," as stated in the ITS Applicability.	3.4.9 Applicability	3/4.6.A
A3	CTS 3.6.A.5.a is clarified by adding a NOTE that requires a determination be made whether the RCS is acceptable for continued operation whenever the P/T limit is not met, regardless of whether compliance with the LCO is restored. This change only provides clarification, because CTS 3.6.A.5.a effectively contains this requirement.	3.4.9 Condition A Note	3.6.A.5.a
A4	The CTS provides actions appropriate for placing the facility in a condition outside the MODE(S) of Applicability when the Applicability is MODES 1, 2, and 3. Since certain PT limits apply even when not in MODES 1, 2, and 3, a new ITS Action was added, as described in DOC M4. Due to this addition, to clarify the use and application of applying the appropriate action depending on the MODE of operation, the specific clarification "in MODES 1, 2, or 3" is added.	3.4.9 Condition A	3.6.A.5
A5	Not used.	N/A	N/A
A6	The requirement to record the various P/T limit temperatures and pressures is not included in the ITS, since this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records).	N/A	4.6.A.1, 4.6.A.2, 4.6.A.3, 4.6.A.4, 4.6.A.6
A7	Thermal stresses on vessel components are dependent upon the temperature difference between the idle loop coolant and the RPV coolant. ITS SR 3.4.9.5 ensures the temperature difference between the idle loop and the RPV coolant is acceptable. The CTS requirements to monitor the temperature difference between an idle loop and an operating loop are unnecessary and are deleted since they are redundant to the loop-to-coolant requirement of ITS SR 3.4.9.5. However, in accordance with procedures and as discussed in the Bases for ITS SR 3.4.9.4, the loop-to-coolant temperature check may use the operating loop temperature as representative of "coolant temperature".	N/A	3/4.6.A.6.c
A8	The Frequency of the CTS requirements to verify the reactor vessel head flange and flange temperatures are within limits is either every 12 hours or 30 minutes when the reactor vessel head flange falls below a prescribed limit. Therefore, the first required Surveillance is 12 hours or 30 minutes after the specified temperature is reached. In the ITS a Note has been added to clarify that the Surveillances are not required to be performed until 30 minutes after RCS temperature ≤ 100°F or 120°F, respectively, consistent with the CTS requirements.	SR 3.4.9.7 Note, SR 3.4.9.8 Note	4.6.A.1.a, 4.6.A.1.b
A9	Not used.	N/A	N/A
	CTS 3/4.6.F, STRUCTURAL INTEGRITY		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS - OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.5.1	3/4.5.A, 3/4.5.C, 3/4.5.D, 3/4.5.G, 4.6.E.3, 4.6.E.4, Table 4.2-2, 3/4.9.F
A2	Existing specifications governing Operability and Surveillance Testing of Core Spray, Low Pressure Coolant Injection, High Pressure Coolant Injection, and Automatic Depressurization System are proposed to be combined into one specification, in recognition of the interdependence of the Operability requirements of these systems in meeting the assumptions of the design basis loss of coolant accident. In addition, supporting requirements concerning maintenance of filled discharge piping and the LPCI MOV independent power supply have been included along with the Surveillances of the ECCS.	3.5.1	3/4.5.A, 3/4.5.C, 3/4.5.D, 3.5.G, 3.9.F.1
A3	The CTS requires a simulated automatic actuation test of CS, LPCI, and HPCI. The ITS maintains this Surveillance, but includes a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance. This Note, therefore, is explicit recognition that the ITS Surveillance can be satisfied by a series of overlapping tests. Since surveillance testing of CS, LPCI, and HPCI do not presently require actual injection, and are all currently satisfied by a series of overlapping tests, the addition of the Note excluding vessel injection/spray is an administrative change. In addition, the CTS requires a simulated actuation test to be performed on the ADS valves. A Note is proposed to be added to exclude valve actuation, similar to the ECCS pumps Notes.	SR 3.5.1.10, SR 3.5.1.11	4.5.A.1.a, 4.5.A.3, 4.5.C.1, 4.5.D.1
A4	The CTS specifically state that the High Pressure Coolant Injection (HPCI) System and Automatic Depressurization System (ADS) valves are not required to be Operable during low power physics testing and during reactor operator (criticality) training provided the reactor coolant temperature ≤ 212°F. However, the CTS does not require the HPCI System to be Operable when the reactor coolant temperature is ≤ 212°F and does not require the ADS valves to be Operable in cold condition (i.e., reactor coolant temperature is ≤ 212°F). Therefore, these explicit redundant requirements are not retained in the ITS.	N/A	3.5.C.2, 3.5.D.3
A5	Not used.	N/A	N/A
A6	The CTS requires that following any period where the LCPI or CS subsystems have not been maintained in a filled condition; the discharge piping of the affected subsystem shall be vented from the high point of the system and water flow observed prior to declaring the subsystem operable. This requirement has not been included in the ITS since it is redundant to the ITS SR 3.0.1 requirements.	SR 3.0.1	4.5.G.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	The CTS requires that the "reactor shall not be started up with the RHR System supplying cooling to the fuel pool" and that "the RHR System shall not supply cooling to the spent fuel pool when the reactor coolant temperature is above 212°F." These statements are not necessary since ITS LCO 3.0.4 ensures that the LPCI subsystems are Operable (as required by another specification) prior to entering MODE 3.	LCO 3.0.4	3.5.A.4
A8	The CTS does not have a specific ACTION to enter LCO 3.0.C if sufficient ECCS subsystems are inoperable. However, entry into LCO 3.0.C is implicit, since ACTIONS are not provided for all instances of inoperabilities. In the ITS, a specific ACTION has been added that delineates when ITS LCO 3.0.3 is to be entered. In addition, the CTS requires that "the reactor shall be brought to cold condition within 24 hours" when both LPCI independent power supplies are made or found to be inoperable. This specific default action has been changed to require entry into LCO 3.0.3 since the plant will be outside of its design basis in the condition. This portion of the change may be considered as more restrictive, but since the current Completion Times in CTS 3.9.F.3 and CTS 3.0.C are equivalent, this change is classified as administrative.	3.5.1 ACTION H	3.5.A, 3.5.C, 3.5.D, 3.9.F.3
A9	The requirements in CTS 3.5.A.3.b and CTS 4.5.A.3.b concerning the LPCI cross tie valves have been simplified into one Surveillance in the ITS that requires the verification that the valves are closed and power is removed from the electrical valve operator every 31 days. The details on how this is performed have been relocated to the Bases in accordance with DOC LA4.	SR 3.5.1.4	3.5.A.3.b, 4.5.A.3.b
A10	The CTS requires the associated ECCS pump (i.e., LPCI, CS, and HPCI) to be declared inoperable for the purposes of satisfying CTS 3.5.A and 3.5.C, when the associated pump discharge piping cannot be maintained in a filled condition. This explicit cross reference is not required in the ITS since this CTS requirement is included along with the requirements of the associated system.	N/A	3.5.G.1
A11	CTS 4.5.G.1 requires the discharge piping of the required ECCS subsystem to be vented every month prior to the testing of the LPCI and CS subsystems. This explicit requirement to perform the surveillance prior to the testing of the LPCI and CS subsystems has been deleted. The requirement to perform this surveillance every 31 days is sufficient to ensure the discharge piping is full whenever the system is required to be Operable. This change is necessary since the ECCS subsystems flow rate Surveillances (e.g., CTS 4.5.A.1.b) are no longer tested every month. The Frequency of these Surveillances have been changed to "In accordance with the Inservice Testing Program" in recently approved Technical Specification Licensing Amendment 241. CTS 4.5.G.1 should have been modified during the process of the change. This will make the Surveillance consistent with other parts of the CTS and is therefore considered to be an administrative since the current Surveillance Frequency is every 31 days.	N/A	4.5.G.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A12	The requirement in CTS 3.9.F.2.a that operations may continue only if the other LPCI independent power supply battery including its battery charger, and distribution system is Operable has been deleted. The ITS includes ACTIONS for when two LPCI subsystems are inoperable, thus this ACTION covers the inverter and bus. In addition, the requirements of the battery and battery charger are included in ITS 3.8.4, while the requirements of battery cell parameters are included in ITS 3.8.6. ITS 3.8.4 requires the associated LPCI subsystem to be declared inoperable immediately when the LPCI independent power supply battery or battery charger are inoperable. When a battery cell parameter is not within limits, either the battery is still Operable, or if not then the ACTIONS of ITS 3.8.6 require the associated LPCI battery to be declared inoperable (which will result in the associated LPCI subsystem being declared inoperable). Therefore, the specific requirement is not necessary to be included in the ITS.	N/A	3.9.F.2.a
A13	Not used.	N/A	N/A
	3.5.2, ECCS - SHUTDOWN		
A1	Editorial changes, reformatting, and revised numbering.	3.5.2	3/4.5.F, 3/4.5.G, Table 4.2-2
A2	The CTS does not directly address the OPERABILITY status of LPCI during alignment and operation for decay heat removal. The ITS includes a Note that states that one LPCI subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. This allowance is consistent with the CTS Bases description, which states that a LPCI subsystem operating in the shutdown cooling mode of RHR is considered operable for the ECCS function if it can be realigned manually (either remote or local) to the LPCI mode and is not otherwise inoperable.	SR 3.5.2.4 Note	4.5.F Bases description
A3	The CTS requires two low pressure Emergency Core Cooling subsystems to be Operable when work is being performed with the potential for draining the vessel and requires one low pressure Emergency Core Cooling subsystem to be Operable when no work is being performed with the potential for draining the reactor vessel. The ITS is identical although the format of presentation of these requirements are different. The ITS requires two low pressure ECCS injection/spray subsystems to be Operable. It does not distinguish whether work is being performed with the potential for draining the reactor vessel (OPDRVs). If no OPDRVs are occurring and only one ECCS injection/spray subsystem is Operable, the Specification is met since ITS ACTION B allows continuous operation in this condition.	LCO 3.5.2, 3.5.2 ACTION B	3.5.F.1, 3.5.F.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS requirement to establish Secondary Containment Integrity has been changed in the ITS to a) initiate action to restore secondary containment to OPERABLE status, b) initiate action to restore one standby gas treatment subsystem to OPERABLE status, and c) initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated. The CTS definition of Secondary Containment Integrity has been deleted as discussed in the Discussion of Changes for ITS Chapter 1.0. These three proposed Required Actions will ensure all aspects of secondary containment integrity are maintained.	3.5.2 Required Actions D.1, D.2, and D.3	3.5.F.4
A5	The CTS requires the associated ECCS pump (i.e., LPCI and CS) to be declared inoperable for the purposes of satisfying Specifications 3.5.A, 3.5.C and 3.5.E, when the associated pump discharge piping cannot be maintained in a filled condition. This explicit cross reference is not included in the ITS since this CTS requirement is included along with the requirements of the associated system.	N/A	3.5.G.1
A6	CTS 4.5.G.1 requires the discharge piping of the required ECCS subsystem to be vented every month prior to the testing of the LPCI and CS subsystems. This explicit requirement to perform the surveillance prior to the testing of the LPCI and CS subsystems has been deleted. The requirement to perform this surveillance every 31 days is sufficient to ensure the discharge piping is full whenever the system is required to be Operable. This change is necessary since the ECCS subsystems flow rate Surveillances (e.g., CTS 4.5.A.1.b) are no longer tested every month. The Frequency of these Surveillances have been changed to "In accordance with the Inservice Testing Program" in recently approved Technical Specification Licensing Amendment 241. CTS 4.5.G.1 should have been modified during the process of the change. This will make the Surveillance consistent with other parts of the CTS and is therefore considered to be administrative since the current Surveillance Frequency is every 31 days.	SR 3.5.2.3	4.5.G.1
A7	The CTS requires a simulated automatic actuation test of CS and LPCI. The ITS maintains this Surveillance, but includes a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance. This Note, therefore, is explicit recognition that proposed SR 3.5.2.6 can be satisfied by a series of overlapping tests. Since surveillance testing of CS and LPCI do not presently require actual injection, and are all currently satisfied by a series of overlapping tests, the addition of the Note excluding vessel injection/spray is an administrative change.	SR 3.5.2.6 Note	Table 4.2-2 Note 7
A8	The CTS requires that following any period where the LCPI or CS subsystems have not been maintained in a filled condition; the discharge piping of the affected subsystem shall be vented from the high point of the system and water flow observed prior to declaring the subsystem operable. This requirement has not been included in the ITS since it is redundant to the ITS SR 3.0.1 requirements.	SR 3.0.1	4.5.G.2
	3.5.3, RCIC SYSTEM		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, PRIMARY CONTAINMENT		
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	1.0.M, 3/4.7.A.2, 3.7.A.5.e, 3.7.A.8, 4.7.A.1, 4.7.A.3, 4.7.A.5.d
A2	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.1 requires that the primary containment shall be OPERABLE.	LCO 3.6.1.1	3.7.A.2
(1) A3	The CTS requirement to perform required visual examination and leakage rate testing of the Primary Containment has been modified to include an exception for primary containment air lock testing, since in the ITS, the air lock testing is included in another Specification (ITS 3.6.1.2).	~~3.6.1.1~~ ~~3.6.1.2~~ SR 3.6.1.1.1	4.7.A.2.a
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS		
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	1.0.M, 3.7.A.2, 3.7.A.8, 4.7.A.2.a
A2	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.2 requires that the primary containment air locks shall be OPERABLE.	3.6.1.2	3.7.A.2
A3	The ITS Surveillance that requires leakage rate testing of the air locks includes a Note that states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This Note is consistent with the CTS 1.0.M Primary Containment Integrity condition requirement that at least one door in each air lock is closed and sealed.	SR 3.6.1.2.1 Note 1	1.0.M, 4.7.A.2.a
A4	Not used.	N/A	N/A

(1) This only affects SR 3.6.1.1.1 (This is where the excemption is located)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
(1) A5	The ITS includes a Note that requires the applicable Conditions and Required Actions of ITS 3.6.1.1, Primary Containment, to be entered when air lock leakage exceeds the overall Primary Containment leakage rate acceptance criteria. This Note establishes the need to consider the Primary Containment OPERABILITY if the air lock leakage acceptance criteria is not being met. This change is consistent with the relationship of containment integrity and air lock OPERABILITY established in the CTS definition of Containment Integrity. In addition, the ITS leakage rate test is modified by a Note that states the "Results shall be evaluated against criteria applicable to SR 3.6.1.1.1". ITS SR 3.6.1.1.1 is the primary containment leakage rate test and will ensure that air lock leakage is properly accounted for in determining the combined Type B and C primary containment leakage, consistent with the CTS requirements.	3.6.1.2 ACTIONS Note 3, SR 3.6.1.2.1 Note 2	1.0.M, 3.7.A.2 4.7.A.2.a
	3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.3	1.0.M, Table 4.2-1, 3.7.A.2, 3/4.7.D, 3.7.A.8, 4.7.A.2.b, 4.7.A.2.c, 4.7.B.4
A2	Three Notes have been included in the ITS that are consistent with the intent of the CTS. ITS 3.6.1.3 Note 2, which allows separate Condition entry for each penetration flow path, provides explicit instructions for proper application of the ACTIONS for Technical Specification compliance. In conjunction with the proposed Specification 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing ACTIONS for inoperable isolation valves. ITS 3.6.1.3 Note 3, to enter applicable Conditions and Required Actions for systems made inoperable by PCIVs, establishes the need to verify individual system OPERABILITY based on the affect of an INOPERABLE PCIV. This requirement is consistent with individual CTS Surveillance Requirements to verify valve OPERABILITY and/or correct position. ITS 3.6.1.3 Note 4, to enter the applicable Conditions and Required Actions of ITS 3.6.1.1, Primary Containment, when PCIV leakage exceeds the overall Primary Containment leakage rate acceptance criteria, establishes the need to consider the Primary Containment OPERABILITY if the PCIV leakage acceptance criteria is not being met. This change is consistent with the relationship of containment integrity and PCIV OPERABILITY established in the CTS 1.0.M definition of Containment Integrity. In addition, Note 4 clarifies that "systems" include the primary containment. Since proposed LCO 3.0.6 waives the requirement to cascade, the intent of the CTS would not necessarily apply. The clarification provided by the Note is consistent with the intent and interpretation of the existing Technical Specifications.	3.6.1.3 ACTIONS Notes 2, 3, and 4	3/4.7.D
A3	The CTS requirement, when one PCIV is inoperable, to maintain at least one isolation valve operable in each affected penetration that is open, is not explicitly included in the ITS. The ITS is equivalent through its Conditions and Notes for one and two inoperable PCIVs in a penetration.	3.6.1.3 Condition B	3.7.D.2

(1) CTS 3.7.A.2 is not part of ITS 3.6.1.2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS requirement, when a PCIV is inoperable, to "restore the inoperable valve(s) to operable status" has been deleted since this is always an option and does not need to be specified in the ITS.	N/A	3.7.D.2.a
A5	The CTS requirement to record the results of the PCIV position verification is not included in the ITS, since it is duplicative of the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests/verifications, and compliance with 10 CFR 50 Appendix B is required by the JAFNPP Operating License.	N/A	4.7.D.2
A6	Not used.	N/A	N/A
A7	Not used.	N/A	N/A
A8	The ITS provides an exception for reactor building-to-suppression chamber vacuum breakers, in that they are not included in the PCIV Specification. Although, reactor building-to-suppression chamber vacuum breakers isolate primary containment penetrations, they are excluded from this specification since reactor building-to-suppression chamber vacuum breakers OPERABILITY requirements are currently specified in another CTS Specification and retained in a separate ITS Specification. Along with this change, the explicit requirement in the CTS that all instrument line excess flow check valves must be Operable has not been specifically stated in the ITS LCO statement, since the valves are considered PCIVs.	LCO 3.6.1.3	3.7.D.1
A9	The CTS requirement to test PCIVs that are power operated and automatically initiated for simulated automatic initiation per the IST Program is being revised to more accurately present the requirements as intended. Since the IST Program does not specify the method used to initiate a test for closure timing, the ITS verification that each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal is provided. The Frequency of 24 months has been included consistent with the IST Program and the requirements of CTS Table 4.2-1 (Note 7), Primary Containment Isolation System Instrumentation Test Calibration Requirements.	SR 3.6.1.3.7	4.7.D.1.a
A10	CTS 4.7.D.1.c, which specifies that all normally open power operated isolation valves (except for the main steam isolation valves) shall be fully closed and reopened at a Frequency in accordance with the IST Program, is encompassed by CTS 4.7.D.1.a. Therefore, the ITS includes a single Surveillance for these two requirements; the redundancy is unnecessary.	SR 3.6.1.3.5	4.7.D.1.a, 4.7.D.1.c
A11	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.3 requires that the primary containment isolation valves shall be OPERABLE.	3.6.1.3	3.7.A.2
3.6.1.4, DRYWELL PRESSURE			

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	The CTS Surveillance that requires the pump operability and flow rate test on the RHR pumps references another CTS Surveillance with respect to the Frequency. The Frequency in the other CTS Specification is in accordance with the Inservice Testing Program. The ITS does not include the cross-reference; but includes the actual Frequency (in accordance with the Inservice Testing Program).	SR 3.6.1.9.2	4.5.B.1.a
(1) A4	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHR containment spray component is inoperable. These explicit verifications have all been deleted.	~~3.6.1.9~~ N/A	4.5.B.3
	3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE		
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.7.A.1, 3.7.A.8, Table 4.2-8
A2	Not used.	N/A	N/A
A3	CTS 4.7.A.1 requires the torus temperature to be monitored as specified in CTS Table 4.2-8. The Frequency of the Surveillance in CTS Table 4.2-8 is daily. The ITS does not include the cross-reference; but includes the actual Frequency (24 hours).	SR 3.6.2.1.1	4.7.A.1, Table 4.2-8
(2) A4	During testing that adds heat to the suppression pool, the CTS requires the pool temperature to be continuously recorded until heat is terminated or in lieu of continuously recording, the operator shall log the temperature every 5 minutes. In the ITS, the continuous recording or logging requirement is not included, since it is duplicative of the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests/verifications and compliance with 10 CFR 50 Appendix B is required by the JAFNPP Operating License.	~~SR 3.6.2.1.1~~ N/A	4.7.A.1
A5	The CTS requires the maximum water temperature of the suppression pool to be ≤ 95°F during normal power operation. The CTS also defines "Reactor Power Operation" to be any operation with the Reactor Mode Switch in the Startup/ Hot Standby or Run position with reactor critical and above 1% rated thermal power. The ITS requires the suppression pool average temperature to be ≤ 95°F when THERMAL POWER is > 1% RTP and "no testing that adds heat to the suppression pool is being performed." The addition of the words concerning testing (no testing) is considered an administrative change since testing is accounted for in the suppression pool temperature limits in the CTS. The exclusion of the details concerning the Reactor Mode Switch position and whether or not the reactor is critical is also considered to be an administrative change, ~~this is because~~ since the ITS Applicability, the MODES Table, and the requirement that the LCO ~~are~~ is ~~explicitly~~ applicable when ~~reactor~~ THERMAL POWER is > 1% RTP are sufficient.	LCO 3.6.2.1.a	3.7.A.1.~~d~~. (1)

1. The verifications are deleted - they are not in the ITS (also consistent with 3.6.2.3 DOC A3 and 3.6.4.3 DOC A5)
2. The requirement has been deleted - it is not in the ITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.2.2, SUPPRESSION POOL WATER LEVEL		
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.7.A.1, 3.7.A.8
(1) A2	CTS 4.7.A.1 requires the torus water level to be monitored as specified in CTS Table 4.2-8. The Frequency of the Surveillance in CTS Table 4.2-8 is daily. The ITS does not include the cross-reference; but includes the actual Frequency (24 hours).	SR 3.6.2.2.1	4.7.A.1, Table 4.2-8
	3.6.2.3, RHR SUPPRESSION POOL COOLING		
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.5.B
(2) A2	The ITS includes the phrase "or can be aligned to the correct position" in recognition that the required lineup for ECCS OPERABILITY requires the RHR System to be in a lineup other than that necessary to perform the containment spray function and that the containment cooling function is manually actuated (requiring repositioning of valves and starting of the RHR pump by the operator), consistent with CTS interpretation and practices.	SR 3.6.2.3.1	4.5.B.1.e
A3	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHR suppression pool cooling component is inoperable. These explicit verifications have all been deleted.	N/A	4.5.B.3
	3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE		
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.7.A.7
A2	The CTS cross-reference to the requirements in Table 4.2-8 are not included since they are redundant to the normal instrumentation requirements.	N/A	4.7.A.7.a
	3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION		
A1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.7.A.6

1. Consistent with 3.6.2.1 DOC A3
2. Consistent with 3.6.1.9 DOC A2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS cross-reference to the requirements in Table 4.2-8 are not included since they are redundant to the normal instrumentation requirements.	N/A	4.7.A.6.a
	3.6.3.2, CAD SYSTEM		
NONE	NONE	NONE	NONE
	3.6.4.1, SECONDARY CONTAINMENT		
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.1	1.0.S, 3/4.7.C
A2	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.1 Applicability	3.7.C.1
A3	The CTS Surveillance Requirements to perform preoperational and other tests during the first operating cycle are ~~to be~~ deleted since preoperational testing and the first refueling cycle has already been completed.	N/A	4.7.C.1.a, 4.7.C.1.b
A4	The CTS reference to "Secondary Containment Integrity" has been deleted since the CTS definition of Secondary Containment Integrity in CTS 1.0.S is incorporated into ITS 3.6.4.1, 3.6.4.2 and 3.6.4.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.4.1 requires that the secondary containment shall be OPERABLE.	LCO 3.6.4.1	3.7.C.1
A5	Not used.	N/A	N/A
	3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	1.0.S, Table 4.2-1, 3.7.C, RETS Table 3.10-2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.2 Applicability	3.7.C.1
A3	ITS 3.6.4.2 Note 3, to enter applicable Conditions and Required Actions for systems made inoperable by SCIVs, establishes the need to verify individual system OPERABILITY based on the affect of an INOPERABLE SCIV. This requirement is consistent with individual CTS Surveillance Requirements to verify valve OPERABILITY and/or correct position.	3.6.4.2 ACTIONS Note 3	3.7.C
A4	The CTS reference to "Secondary Containment Integrity" has been deleted since the CTS definition of Secondary Containment Integrity in CTS 1.0.S is incorporated into ITS 3.6.4.1, 3.6.4.2 and 3.6.4.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.4.2 requires that the secondary containment isolation valves shall be OPERABLE.	LCO 3.6.4.2	3.7.C.1
A5	Not used.	N/A	N/A
A6	The detail in the RETS identifying how the Logic System Functional Test (LSFT) is to be performed (i.e., where possible using test jacks) has not been included in the ITS since the definition of LSFT provides the necessary guidance.	LSFT definition	RETS Table 3.10-2 Note f
	3.6.4.3, STANDBY GAS TREATMENT SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.3	1.0.S, 3/4.7.B, 3.7.C, Table 4.2-1, RETS Table 3.10-2
A2	The CTS requirements for ventilation filter testing are moved to ITS 5.5.8 "Ventilation Filter Testing Program (VFTP)". ITS SR 3.6.4.3.2 requires that the SGT filter testing be performed in accordance with the Ventilation Filter Testing Program to determine the Operability of the SGT System.	SR 3.6.4.3.2, 5.5.8	4.7.B.1.a, 4.7.B.1.b, 4.7.B.1.c
A3	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.3 Applicability	3.7.B.1, 3.7.C.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS requires manual operability of the bypass valve for Standby Gas Treatment (SGT) subsystem filter cooling to be demonstrated (for each subsystem). The ITS requires cycling of each ~~the~~ SGT subsystem filter cooling cross-tie valve (cooler bypass valve), consistent with the current practice and interpretation.	SR 3.6.4.3.4	4.7.B.1.e
1 A5	The CTS requires the redundant SGT subsystem to be verified to be operable immediately and daily thereafter when an SGT subsystem is inoperable. This explicit verification has been deleted. ~~but remains part of an Operability determination.~~	N/A	4.7.B.2
A6	The detail in the RETS identifying how the Logic System Functional Test (LSFT) is to be performed (i.e., where possible using test jacks) has not been included in the ITS since the definition of LSFT provides the necessary guidance.	LSFT definition	RETS Table 3.10-2 Note f
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE

1. This requirement to test the SGT immediately and daily thereafter is deleted – it is not required to be performed as part of an Operability determination.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, RHRSW SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.5.B
A2	The CTS footnote that provides an additional 4 days to operate with an inoperable RHRSW subsystem during the installation of modification 00-125 has not been included in the ITS since the modification is complete.	N/A	3.5.B.3 footnote *
	3.7.2, ESW SYSTEM and UHS		
A1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.11.D, 3/4.11.E
A2	The CTS allows 7 days of operation with one Emergency Service Water System inoperable. The ITS includes a Note that would require the applicable Conditions and Required Actions of ITS 3.8.1, "AC Sources — Operating," to be entered for the Emergency Diesel Generator (EDG) subsystem made inoperable by ESW. This Note is an exception to proposed LCO 3.0.6 which ensures proper ACTIONS are taken for an inoperable EDG subsystem. This Note is consistent with the current requirements, since the CTS only allows 7 days of operation if the operable Emergency Diesel Generator System is demonstrated to be operable immediately and daily thereafter.	3.7.2 Required Action A.1 Note	3.11.D.2
A3	The ESW instrumentation surveillance requirements have been moved to ITS 3.3.7.3, "Emergency Service Water (ESW) System Instrumentation".	3.3.7.3	4.11.D.1.e, 4.11.D.1.f
A4	The CTS requirements for intake deicing heaters have been included with the requirements of Emergency Service Water (ESW) and the Ultimate Heat Sink (UHS), since the intake deicing heaters help to ensure adequate flow to the ESW and Residual Heat Removal System.	3.7.2	3/4.11.E
A5	The CTS requires the intake deicing heaters to be Operable when intake water temperature is less than or equal to 37°F. When these heaters are inoperable the default action is to be in the cold condition (MODE 4). In the ITS, the Applicability of the deicing heaters is MODE 1, 2 and 3, consistent with the requirements of the Emergency Service Water (ESW) System. In addition, the ITS includes a Note in the applicable surveillances related to the heaters that these SRs are not required to be met at lake temperatures > 37°F.	3.7.2 Applicability, SR 3.7.2.3, SR 3.7.2.5, SR 3.7.2.6	3.11.E
A6	The CTS requires the weekly verification of the six heater feeder ammeters. The ITS requires the verification of the "required" deicing heater feeder current for each division of deicing heaters. Since the CTS only requires 18 out of 88 heaters to be OPERABLE (modified by DOC M3), there is no reason to require the measurement of all heater feeder ammeters.	SR 3.7.2.3	4.11.E.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	The CTS requires a valve alignment check every 31 days. The ITS includes a Note that clarifies that the isolation of flow to an individual component does not render the ESW System inoperable; only the individual component is considered inoperable. This is consistent with current practice and the intent of the CTS.	SR 3.7.2.4 Note	4.11.D.1.c
A8	The CTS requirements to monitor the individual heater current once every 6 months has been changed to require the verification of the required deicing heater power, consistent with current practice and the intent of the CTS.	SR 3.7.2.5	4.11.E.2
	3.7.3, CREVAS SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.11.A
(1) A2	The specific CTS requirements for the periodic verification of the filter trains associated with the Control Room Emergency Ventilation Air Supply (CREVAS) System have been moved to ITS 5.5.8, the Ventilation Filter Testing Program (VFTP). This ITS Specification will include a Surveillance that will require performing CREVAS System filter testing in accordance with the VFTP.	SR 3.7.3.2, 5.5.8	4.11.A.1.a, 4.11.A.1.b, 4.11.A.1.c, 4.11.A.2
	3.7.4, CONTROL ROOM AC SYSTEM		
NONE	NONE	NONE	NONE
	3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS		
A1	Editorial changes, reformatting, and revised numbering.	3.7.5	RETS 3.5, RETS Tables 3.10-1 and 3.10-2
A2	The RETS specifies the limitations and surveillance requirements for gross radioactivity (beta and/or gamma) rate of noble gases. The ITS only places limitations on the gross gamma activity rate of the noble gases instead of "beta and/or gamma". The option to measure the beta rate of activity has been deleted since JAFNPP utilizes the gross gamma approach which is consistent with industry practice.	LCO 3.7.5, SR 3.7.5.1	RETS 3.5.a (LCO and SR sections)

1. Consistent with 3.6.4.3 DOC A2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC SOURCES - OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.8.1	3.9.A, 3/4.9.B, 3/4.9.C.2, 3.0.E
A2	The CTS specifies the conditions under which the EDG system is required will be simulated to demonstrate that the pair of diesel generators will start, accelerate, force parallel and accept the emergency loads in the prescribed sequence. The ITS is clarified to require verification that the diesel generator, in response to loss of power signal in conjunction with an ECCS initiation signal will auto-start from a standby condition and energize as required permanently connected loads within the required time and auto-connected emergency loads in the prescribed sequence.	SR 3.8.1.12	4.9.B.4
A3	The CTS monthly requirement to start, accelerate, force parallel and load each pair of EDGs and run until both EDGs are at steady state temperature conditions has been divided into two separate Surveillance Requirements; a start test and a load test. In addition, due to this splitting, the ITS includes a Note to clarify the requirement that the load test must be preceded by and immediately follow, without shutdown, a successful start test.	SR 3.8.1.2, SR 3.8.1.3, including Note 4	4.9.B.1
A4	The CTS requires that the paralleled EDG pair be loaded until both EDGs are at steady state temperature conditions. The ITS requires that the loaded EDG pair be run for ≥ 60 minutes, since this is the minimum run time to stabilize engine temperatures.	SR 3.8.1.3	4.9.B.1
A5	The CTS includes a LCO statement related to the Diesel Fuel Oil Transfer System OPERABILITY. The ITS does not include a specific LCO statement, as it is part of the AC Sources LCO statement, and is ensured by an ITS Surveillance Requirement.	LCO 3.8.1	3.9.C.2
A6	The CTS does not provide specific Actions for the condition of three or more AC sources inoperable and therefore entry into CTS 3.0.C is required. Since the ITS format allows multiple Conditions to be entered simultaneously, with three or more AC sources inoperable, ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. However, consistent with the CTS default to CTS 3.0.C, ITS 3.8.1 ACTION G will require direct entry into ITS LCO 3.0.3.	3.8.1 ACTION G	3.9.B
A7	The wording in the CTS related to the criteria for determining whether a potential common cause EDG failure exists is editorially changed in the ITS to require a determination of whether the other Operable EDG and EDG subsystems are not inoperable due to common cause failure.	3.8.1 Required Action B.3.1	4.9.B.5.a, 4.9.B.5.b, 4.9.B.5.c

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	The ITS includes a Note in certain EDG Surveillances to allow all EDG subsystem starts to be preceded by an engine prelube period to minimize wear and tear on the EDGs during testing. This is consistent with the CTS since the EDGs at JAFNPP are not immediately loaded upon startup and run in a continuous prelube mode of operation. Insert A8	SR 3.8.1.2, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12	4.9.B.1, 4.9.B.4
A9	The CTS provides an allowance that the 7 day allowed outage time for a single offsite circuit can be extended to 14 days (for line #3 and associated transformer only) during the period from 9/9/01 through 9/23/01. Since the time period has been exceeded, this allowance is not applicable anymore, and is not included in the ITS	N/A	CTS 3.9.B.1 footnote*
	3.8.2, AC SOURCES - SHUTDOWN		
A1	Editorial changes, reformatting, and revised numbering.	3.8.2	3.9.D
A2	The CTS requirement for one offsite power source and one Emergency Diesel Generator (EDG) subsystem OPERABLE, whenever any work is being done which has the potential for draining the vessel, secondary containment is required, or core or containment cooling is required is editorially changed in the ITS to require the AC power sources to be OPERABLE when required to support ITS LCO 3.8.8, "Distribution Systems — Shutdown". Actual changes to the requirements are discussed elsewhere.	LCO 3.8.2 and Applicability	3.9.D
A3	The ITS includes a Note that requires the applicable Condition and Required Actions of ITS LCO 3.8.8, "Distribution Systems — Shutdown" be entered when any required division is de-energized as a result of Condition A. While the CTS does not explicitly require this in this Specification, this is consistent with the requirements of the CTS (definition of Operability).	3.8.2 Required Action A Note	Definition of Operability
	3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR		
A1	Editorial changes, reformatting, and revised numbering.	3.8.3	3/4.9.C.1, 3.9.C.3, 4.9.B.2
A2	Consistent with the CTS, the ITS includes a Note that specifically allows separate Condition entry for each EDG. In conjunction with ITS Section 1.3, Completion Times, this Note provides explicit instructions for proper application of the new Specification. It is intended that each Required Action be applied separately for each affected EDG regardless of whether it had been applied previously for inoperable diesel fuel oil, lube oil or starting air functions.	3.8.3 ACTIONS Note	3.9.C.3

1. Change added per Revision I

Insert A8

In addition, the Note to ITS SR 3.8.1.2 also allows a warmup period prior to loading. This is consistent with current practices since the EDGs are not immediately loaded upon startup, but are allowed to warmup for a short time after startup while the operation staff performs post startup EDG checks.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	The CTS requires the voltage of each cell to be measured to nearest 0.01 V. The ITS is clarified to include the actual float voltage requirements in Table 3.8.6-1 (i.e. 2.13 V and 2.07 V), which is specified at a level of measurement tolerance corresponding to 0.01 V.	Table 3.8.6-1	4.9.E.2.a, 4.9.F.2.a
A4	Consistent with the CTS, the ITS includes a Note that specifically allows separate Condition entry for each battery. In conjunction with ITS Section 1.3, Completion Times, this Note provides explicit instructions for proper application of the new Specification. It is intended that each Required Action be applied separately for each affected battery regardless of whether it had been applied previously for inoperable battery cell parameters.	3.8.6 ACTIONS Note	3.9.E, 3.9.F
3.8.7, DISTRIBUTION SYSTEMS - OPERATING			
A1	Editorial changes, reformatting, and revised numbering.	3.8.7	3.9.A, 3.9.E
A2	For clarity and consistency, the CTS terms "in service" and "energized", when referring to the state of the DC Sources, have been replaced in the ITS with the term "OPERABLE."	LCO 3.8.7	3.9.A, 3.9.E.1 .2
A3	The ITS includes a new ACTION for the loss of AC buses and for loss of 125 VDC buses requiring entry into LCO 3.0.3 if two or more electrical power distribution subsystems are inoperable that result in a loss of function. This is consistent with the CTS, since any AC or DC electrical power distribution subsystem inoperability currently requires entry into CTS LCO 3.0.C.	3.8.7 ACTION D	3.0.C
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN			
NONE	NONE	NONE	NONE

font is different

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION		
A1	Editorial changes, reformatting, and revised numbering.	3.10.1	3/4.12.A
A2	The cross references to LCO 3.5.F, "ECCS — Cold Shutdown", and LCO 3.9, "Auxiliary Electrical Systems", respectively have been deleted. The requirements of these Specifications will be normally required in MODE 4 in the associated applicable Specifications of ITS Sections 3.5 and 3.8, therefore the cross references to these Specifications is not necessary.	N/A	3.12.A.1, 3.12.A.5
A3	The ITS includes a clarification to permit the suspension of the requirements of ITS 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling — Cold Shutdown." In addition, the ITS includes a clarification to change the temperature specified in Table 1.1-1 for MODE 4 to "NA". These clarifications have been made to clearly define the allowances of the proposed Specification, consistent with current practice and interpretation of the CTS.	LCO 3.10.1	3.12.A
A4	The CTS allows the reactor to be considered to be in COLD SHUTDOWN with reactor coolant temperature between 212°F and 300°F. The Applicability of the ITS is MODE 4 with average reactor coolant temperature > 212°F (the limit of 300°F has been relocated to the Technical Requirements Manual (TRM) in accordance with DOC LA1). Thus the ITS uses the inequality sign in lieu of the term "between."	LCO 3.10.1	3.12.A
	3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING		
NONE	NONE	NONE	NONE
	3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN		
NONE	NONE	NONE	NONE
	3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN		
NONE	NONE	NONE	NONE
	3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	3.10.5	3/4.10.D
A2	The CTS provides restrictions on control rod and control rod drive maintenance. The ITS includes a restriction on all other CORE ALTERATIONS during the performance of this Special Operations LCO. This addition is considered administrative since CORE ALTERATIONS are addressed in CTS 3.10 (CTS 3.10.A.2 prohibits any fuel loading operations since all other control rods must be fully inserted unless loading in accordance with a spiral on-load. Since the spiral on-load allows refueling interlocks to be bypassed only in those cells which contain no fuel, fuel loading operations are not permitted when the plant is operating within CTS 3.10.D).	3.10.5.~~c~~ d	3.10.D
A3	The CTS includes cross references to other requirements concerning the removal of more than two control rods. These cross references are not included in the ITS since they are redundant to other LCOs.	N/A	3.10.D.2, 4.10.D.2
A4	The CTS allows two control rods to be withdrawn from the reactor core to perform maintenance. Therefore, since maintenance is allowed to be performed, the withdrawn control rods may not be Operable. In the ITS, this is covered by the Applicability, which is MODE 5 with LCO 3.9.5 not met.	3.10.5 Applicability	3.10.D
	3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING		
A1	Editorial changes, reformatting, and revised numbering.	3.10.6	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7
A2	The ITS includes an ACTION to 1) suspend withdrawal/removal of the control rod and removal of the CRD, 2) suspend loading of fuel assemblies, and 3) initiate action to insert all control rods in core cells containing fuel, or to satisfy the requirements of the LCO. The CTS only implies these actions (the control rods and CRDs can only be removed if the LCO requirements are met).	3.10.6 ACTION A	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7
A3	CTS 3.10.A.5.d requires fuel on-loading operations to be suspended until CTS 3.10.A.2 is satisfied. The requirement of CTS 3.10.A.2 is that fuel loading can commence if all control rods are fully inserted except as permitted by CTS 3.10.A.7. CTS 3.10.A.7 specifies the requirements of a spiral on-load. These cross references are not included in the ITS since the requirements of CTS 3.10.A.7 (spiral on-loading) have been incorporated directly in this ITS LCO and the refueling requirement of CTS 3.10.A.2 (fuel loading can commence if all control rods are fully inserted) is incorporated into ITS 3.9.3.	LCO 3.10.6.c, LCO 3.9.3	3.10.A.5.d

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS requires the fuel assemblies, situated in the control cell of the control rod to be withdrawn, to be removed. This implies all other control rods are inserted since they would not be allowed to be withdrawn if operating under this LCO. For clarity, the ITS includes an explicit requirement that all other control rods in core cells containing one or more fuel assemblies be fully inserted.	LCO 3.10.6.b	3.10.A.5.b
A5	The CTS requires the verification that the control cell contains no fuel before the corresponding control rod is withdrawn whenever the reactor mode switch is in the refuel position and refueling interlocks are bypassed. This allowance is included in both the ITS LCO and a Surveillance Requirement.	LCO 3.10.6.a, SR 3.10.6.1	4.10.A.2
A6	The ITS adds an explicit Applicability, consistent with the intent of the CTS. This Applicability is MODE 5 with LCO 3.9.3, LCO 3.9.4, and LCO 3.9.5 not met. LCO 3.9.3, "Control Rod Position" requires all rods to be fully inserted. LCO 3.9.4, "Control Rod Position Indication" requires each control rod "full-in" position indication channel to be OPERABLE. LCO 3.9.5, "Control Rod OPERABILITY — Refueling" requires each withdrawn control rod to be OPERABLE. During multiple control rod withdrawals these requirements can not be met for those rods which are to be withdrawn.	3.10.6 Applicability	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7
3.10.7, CONTROL ROD TESTING - OPERATING			
NONE	NONE	NONE	NONE
3.10.8, SHUTDOWN MARGIN TEST - REFUELING			
A1	Editorial changes, reformatting, and revised numbering.	3.10.8	3.6.E.3, Table 3.1-1, 3.5.B.5, 3.2.A, Table 3.2-1, 3.7.A.2, 3.7.A.4.a, 3.7.A.5.a, 3.7.D.1
A2	The explicit allowances in the CTS to allow S/RVs and components of the Containment Cooling Mode of the RHR System to be inoperable have been deleted since these allowances are permitted implicitly in the proposed Applicability of ITS 3.4.3 (for S/RVs), ITS 3.6.1.9 (for RHR Containment Spray), and 3.6.2.3 (for RHR Suppression Pool Cooling) and 3.7.1 (for RHR Service Water), and ITS 3.10.8.	3.4.3 Applicability, 3.6.1.9 Applicability, 3.6.2.3 Applicability, 3.7.1 Applicability, 3.10.8	3.6.E.3, 3.5.B.5

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	The CTS provides an allowance that the provisions of CTS 3.0.D are not applicable when an S/RV is inoperable. The intent of this allowance was to allow the Safety/Relief Valves to be inoperable and allow entry into the low power physics testing or reactor operator training as allowed by the CTS. This explicit allowance has not been included in the ITS, as it is not necessary (CTS 3.0.D is only applicable when changing into modes of operation where the S/RVs are required to be Operable, and, in the case of the S/RVs, they are not required to be Operable during the specified conditions therefore the explicit allowance is not required.)	N/A	3.6.E.4
A4	The requirements of CTS Table 3.1-1 for APRM Neutron Flux-Startup and APRM Inoperative have been moved to ITS LCO 3.10.8.a (ITS LCO 3.3.1.1, "Reactor Protection System Instrumentation", MODE 2 requirements for Function 2.a and 2.d of Table 3.3.1.1-1). This change is consistent with the modifications as discussed in the Discussion of Changes for ITS 3.3.1.1. In addition, the Surveillances required for these instruments have also been included in ITS 3.10.8.	LCO 3.10.8.a, SR 3.10.8.1	Table 3.1-1 Trip Functions APRM Neutron Flux-Startup and Fixed High Neutron Flux, including Note 7

DOC #	SUMMARY	ITS SECTION	CTS SECTION
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS			
NONE	NONE	NONE	NONE
RETS 3.1, GASEOUS EFFLUENT MONITORS			
NONE	NONE	NONE	NONE
RETS 3.2, GASEOUS DOSE RATES			
NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES			
NONE	NONE	NONE	NONE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM			
NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM			

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
	TOTAL DOSE-		
	RETS 5.0, TOTAL DOSE FROM URANIUM FUEL CYCLE		
NONE	NONE	NONE	NONE
	RETS 6.1, MONITORING PROGRAM		
NONE	NONE	NONE	NONE
	RETS 6.2, LAND USE CENSUS PROGRAM		
NONE	NONE	NONE	NONE
	RETS 6.3, INTERLABORATORY COMPARISON PROGRAM		
NONE	NONE	NONE	NONE

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

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

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
2.0 - LA1	6.7.(B), 6.7.(C)	The requirements that the Chief Nuclear Officer, the Director Regulatory Affairs and Special Projects, and the Chairman of the SRC be notified within 24 hours after a safety limit is violated. The requirements that the PORC shall prepare a complete investigative report of each safety limit violation and the contents of the report.	TRM	10 CFR 50.59	3
2.0 - LA2	1.1.D	The detail that the reactor water level safety limit applies when irradiated fuel is in the reactor vessel.	Bases	Bases Control Program	1

CHANGE TYPE

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

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

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

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN					
3.1.1 - LA1	4.3.A.1	Details of the method to perform the CTS 4.3.A.1 (e.g., sufficient control rods shall be withdrawn) and the details of the requirements in CTS 3.3.A.1 and 4.3.A.1 (e.g., that the shutdown margin shall be met at any time in the subsequent fuel cycle).	Bases	Bases Control Program	3
3.1.2, REACTIVITY ANOMALIES					
3.1.2 - LA1	4.3.D	Details of the method to perform the Surveillance and the purposes for the Reactivity Anomalies Surveillance (that the comparison will be used as the base for future reactivity anomaly checks).	Bases	Bases Control Program	3
3.1.3, CONTROL ROD OPERABILITY					
3.1.3 - LA1	4.3.A.2.d	The requirement that an attempt should be made to fully insert a control rod if it is initially determined to be incapable of normal insertion, ~~is unnecessary.~~	Plant Procedures	FitzPatrick procedure control process	3
3.1.3 - LA2	3.3.A.2.b, 3.3.B.1	Details of the methods for disarming CRDs.	Bases	Bases Control Program	3
3.1.3 - LA3	4.3.A.2.f	The method used to determine the position of each control rod (an instrument check of control rod position indication).	Bases	Bases Control Program	3
3.1.4, CONTROL ROD SCRAM TIMES					
3.1.4 - LA1	4.3.C.2	The CTS requires "10% of the control rods" to be scram time tested. This has been changed to "representative sample" and the details of what constitutes a representative sample (i.e., at least 10% of the control rods) has been relocated.	Bases	Bases Control Program	3

1. Consistency with other LA Summaries - none justify the change, they just describe it

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.5, CONTROL ROD SCRAM ACCUMULATORS					
NONE	NONE	NONE	NONE	NONE	NONE
3.1.6, ROD PATTERN CONTROL					
3.1.6 - LA1	3.3.B.3.e	The detailed reasons for control rod patterns being equivalent to those prescribed by the BPWS (i.e., such that the drop of any in-sequence control rod would not result in a peak fuel enthalpy greater than 280 calories/gm).	Bases	Bases Control Program	1
3.1.7, STANDBY LIQUID CONTROL SYSTEM					
3.1.7 - LA1	4.4.A.2, 4.4.A.3, 4.4.A.4, 4.4.A.5	The details of the method for performing the SLC pump flow test (by recirculating demineralized water to the test tank); the details of the method for demonstrating all piping between the SLC storage tank and the pump suction is unblocked (by manually initiating the system, except the explosive valves and pump solution in the recirculation path); the details of the method for testing the explosive valves (to explode one of three primer assemblies manufactured in same batch to verify proper function and then install the two remaining primer assemblies of the same batch in the explosive valves); and the details of the method for verifying flow through the SLC subsystem into the reactor pressure vessel (to test that valves, except explosive valves, not checked by the recirculation test are not clogged).	Bases	Bases Control Program	3
3.1.7 - LA2	4.4.A.6, 4.4.A.7	The requirements to verify the proper operation and setpoints of the relief valves and to disassemble and inspect one explosive valve.	IST Program	10 CFR 50.59	3
3.1.7 - LA3	3.4.C	The detailed information concerning the boron solution for the SLC storage tank, and what support components and variables are required to assure SLC OPERABILITY is maintained.	Bases	Bases Control Program	1
3.1.7 - LA4	Figure 3.4-2	The detail that the saturation temperature of enriched sodium pentaborate solution curve includes a 10°F margin.	Bases	Bases Control Program	1

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.7 - LB1	4.4.C.3	The requirements to calibrate the temperature and level elements.	TRM	10 CFR 50.59	3
3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES					
3.1.8 - LA1	4.3.A.2.e	The requirement concerning the scram discharge volume drain and vent valve closure time criteria (30 seconds).	IST Program	10 CFR 50.59	3

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE					
3.2.1 - LA1	3.5.H	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3
3.2.1 - LA2	3.5.H, 4.5.H	The details related to APLHGR and APLHGR limits.	Bases	Bases Control Program	3
3.2.2, MINIMUM CRITICAL POWER RATIO					
3.2.2 - LA1	3.1.B	The CTS requirement that during reactor power operation with core flow less than 100% of rated, the MCPR operating limit shall be multiplied by the appropriate K_f as specified in the COLR (the actual value of K_f is remaining in the COLR).	Bases	Bases Control Program	3
3.2.2 - LA2	3.1.B	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3
3.2.3, LINEAR HEAT GENERATION RATE					
3.2.3 - LA1	3.5.I	The detail that specifies that the linear heat generation rate (LHGR) is at any rod in any fuel assembly at any axial location.	Bases	Bases Control Program	1
3.2.3 - LA2	3.5.I	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3
3.2.4, APRM GAIN AND SETPOINT					
NONE	NONE	NONE	NONE	NONE	NONE

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE

CHANGE TYPE

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

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.1, RPS INSTRUMENTATION					
3.3.1.1 - LA1	1.0.Z, 2.1.A.2, Table 3.1-1	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.1.1 - LA2	Table 3.1-1	The information in the column "Total Number of Instrument Channels Provided by Design for Both Trip Systems."	Bases	Bases Control Program	1
3.3.1.1 - LA3	Table 3.1-1 Notes 13 and 15	The detail stating that the APRM Neutron Flux-Startup scram function is a fixed point and is increased when the reactor mode switch is placed in the Run position, and the detail stating that the APRM Flow Referenced Neutron Flux scram function is varied as a function of recirculation flow (W).	Bases	Bases Control ~~Function~~ Program	1
3.3.1.1 - LA4	Table 3.1-1 Note 10	The requirement that an APRM will be considered inoperable if there are less than 2 LPRM inputs per level or less than 11 Operable LPRM detectors to an APRM.	Bases	Bases Control Program	2
3.3.1.1 - LA5	Table 3.1-1 Note 6	The statement regarding the Main Steam Line Isolation Valve Closure and Turbine Stop Valve Closure Functions design that permits closure of any two lines without a scram being initiated.	Bases	Bases Control Program	1
3.3.1.1 - LA6	Table 3.1-1	The detail regarding the physical location of the Turbine Control Valve Fast Closure Function's pressure switches.	Bases	Bases Control Program	1
3.3.1.1 - LA7	Table 3.1-1 footnote *	The details concerning conditions and precautions for placing an inoperable channel or trip system in trip.	Bases	Bases Control Program	2
3.3.1.1 - LA8	Table 4.1-1	The detail on how to perform a Functional Test of the Mode Switch in Shutdown Function (place the Mode Switch in shutdown).	Bases	Bases Control Program	3
3.3.1.1 - LA9	Table 4.1-1 Note 1	The detail that describes how to exercise the automatic scram contactors (by performing a functional test of an automatic scram function or by using the RPS Channel Test Switch).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.1 - LA10	Table 3.1-1 Note 16	The detail that the RPS Drywell High Pressure and Reactor Low Water Level instrumentation is common to the PCIS.	UFSAR	10 CFR 50.59	1
3.3.1.1 - LA11	Table 4.1-1 Note 6, Table 4.1-2 Note 5	The method for performing the Functional Test and Calibration (utilizing a water column or similar device to provide assurance that damage to a float or other portions of the float assembly will be detected).	Bases	Bases Control Program	3
3.3.1.1 - LA12	Table 4.1-1, Table 4.1-2	The listing of the Turbine First Stage Pressure Permissive as an attribute of the Turbine Stop Valve Closure and Turbine Control Valve Fast Closure Functions.	Bases	Bases Control Program	1
3.3.1.1 - LA13	Table 3.1-1 footnote **	The requirement that, with channels in both trip systems inoperable, the trip system with the greatest number of inoperable channels be the trip system that is placed in trip.	Bases	Bases Control Program	3
3.3.1.1 - LA14	4.1.A footnote *	The allowance that the sensor is eliminated from response time testing for the RPS actuation logic circuits for Reactor High Pressure and Reactor Water Level - Low Functions.	Bases	Bases Control Program	3
3.3.1.2, SRM INSTRUMENTATION					
3.3.1.2 - LA1	3.10.B.1	The requirement that the SRMs be inserted to the normal operating level during Core Alterations.	Bases	Bases Control Program	~~3~~ 2
3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION					
3.3.2.1 - LA1	Table 3.2-3	The information in the column "Total Number of Instrument Channels Provided by Design"	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		that the second individual be a "reactor" or "senior" operator or a "reactor engineer" and the detail that			
3.3.2.1 - LA2	4.3.B.3.a.(2), 4.3.B.3.a.(3)	The RWM computer on line diagnostic test and the proper annunciation of the selection error Surveillances.	TRM	10 CFR 50.59	3
3.3.2.1 - LA3	4.3.B.3.a.(4)	The method of performing the RWM Channel Functional Test (by withdrawing an out-of-sequence control rod no more than to the block point, then reinserting the subject rod).	Bases	Bases Control Program	3
3.3.2.1 - LA4	N/A	Not used.	N/A	N/A	N/A
3.3.2.1 - LA5	Table 3.2-3	The detail that the RBM is flow biased.	Bases	Bases Control Program	1
(1) 3.3.2.1 - LA6	3.3.B.3.c 3.3.B.3.a	The detail that when the RWM is inoperable and a control rod is being moved, the individual moving the rod shall have no other concurrent duties during the rod withdrawal or insertion.	Bases	Bases Control Program	3
3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION					
3.3.2.2 - LA1	1.0.Z, Table 3.2-6	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.3.1, PAM INSTRUMENTATION					
3.3.3.1 - LA1	Table 3.2-8	The information in the column "No. of Instrument Channels Provided by Design"	Bases	Bases Control Program	1

1. Revision I Change

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.3.1 - LA2	Table 3.2-8 Note F	The requirement that, with the Primary Containment Hydrogen/Oxygen monitor inoperable, operation for 30 days is permissible "provided at least once per 24 hours, either the appropriate parameter(s) is monitored and logged using 27PCX-101A/B or an appropriate grab sample is obtained and analyzed."	TRM	10 CFR 50.59	3
3.3.3.1 - LA3	N/A	Not used.	N/A	N/A	N/A
3.3.3.2, REMOTE SHUTDOWN SYSTEM					
3.3.3.2 - LA1	N/A	Not used.	N/A	N/A	N/A
3.3.3.2 - LA2	Table 3.2-10, including Note 1	The information in the columns "Instrument or Control" and "Panel or Location" and the statement that the minimum number of divisions for all instruments and controls is 1.	TRM	10 CFR 50.59	1
3.3.4.1, ATWS-RPT INSTRUMENTATION					
3.3.4.1 - LA1	Table 3.2-7, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.4.1 - LA2	Table 3.2-7 footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.5.1, ECCS INSTRUMENTATION					

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION					
3.3.6.1 - LA1	Tables 3.2-1 and 3.2-8	The information in the column "Total Number of Instrument Channels Provided by Design for Both Trip Systems."	Bases	Bases Control Program	1
3.3.6.1 - LA2	Table 3.2-1 Footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.6.1 - LA3	Table 3.2-1 Actions 3.C, 3.D, and 3.E, Table 3.2-8 Footnote *	The Systems isolated by certain instruments.	Bases	Bases Control Program	1
3.3.6.1 - LA4	Table 3.2-8 Note 8	The details of the logic and penetrations isolated by the Reactor Low Water Level and Drywell High Pressure Trip Functions.	Bases	Bases Control Program	1
3.3.6.1 - LA5	Table 4.2-1	The details of which valves are isolated by the various instruments during Logic System Functional Tests.	Bases	Bases Control Program	1
3.3.6.1 - LA6	Table 3.2-1 Note 7	The detail that the Reactor Low Water Level and Drywell High Pressure Functions are common to the RPS Instrumentation.	Bases	Bases Control Program	1
3.3.6.1 - LA7	Table 4.2-1 Note 11	The methods for performing a detector calibration and a Channel Calibration (using a radiation source and a current source, respectively).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.1 - LA8	Table 3.2-2 Item 10, including Notes 2 and 12, Table 4.2-2 Instrument Channel 3a)	The Reactor Low Pressure Trip Function requirements.	TRM	10 CFR 50.59	3
3.3.6.1 - LA9	Table 3.2-1, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.6.1 - LA10	N/A	Not Used.	N/A	N/A	N/A
3.3.6.1 - LA11	Table 3.2-1 Note 2.b	The detail of what constitutes PCIS Initiation capability (for at least one containment isolation valve in the affected penetration).	Bases	Bases Control Program	3
3.3.6.1 - LA12	4.2.A footnote *	The details that the sensors for the Reactor Low Water Level (Level 1), Low Steam Line Pressure, and High Steam Line Flow Functions are eliminated from response time testing of the MSIV actuation logic circuits.	Bases	Bases Control Program	3
3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION					
3.3.6.2 - LA1	Table 3.2-1, RETS Table 3.10-1	The information in the columns "Total Number of Instrument Channels Provided by Design for Both Trip Systems" and "Total Number of Instrument Channels Provided by Design."	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION					
3.3.7.2 - LA1	Table 3.2-1, RETS Table 3.10-1	The information in the columns "Total Number of Instrument Channels Provided by Design for Both Trip Systems" and "Total Number of Instrument Channels Provided by Design."	Bases	Bases Control Program	1
3.3.7.2 - LA2	Table 4.2-1 Note 11	The methods for performing a detector calibration and a Channel Calibration (using a radiation source and a current source, respectively).	Bases	Bases Control Program	3
3.3.7.2 - LA3	Table 3.2-1 Note 1.a footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.7.3, ESW SYSTEM INSTRUMENTATION					
3.3.7.3 - LA1	3.11.D.1	The statement that the ESW System ensures adequate equipment and area cooling.	Bases	Bases Control Program	1
3.3.8.1, LOP INSTRUMENTATION					
3.3.8.1 - LA1	Table 3.2-2, including Notes 13, 14, and 15	The information in the column "Remarks," that the trip level setting (changed to Allowable Value) units are based on the secondary volts, the correlation of secondary voltage to primary voltage, and the actions of the LOP Instrumentation (i.e., what the instrumentation actuates).	Bases	Bases Control Program	1, 2
3.3.8.2, RPS ELECTRIC POWER MONITORING					
3.3.8.2 - LA1	4.9.G.2	The details of what constitutes a system functional test.	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.1, RECIRCULATION LOOPS OPERATING					
3.4.1 - LA1	3.5.K.2	The requirements that during resumption of two-loop operation following a period of single-loop operation, the discharge valve of the lower speed pump not be opened unless the speed of the faster pump is less than 50 percent of its rated speed.	TRM	10 CFR 50.59	2
3.4.2, JET PUMPS					
3.4.2 - LA1	4.6.G.A	The details to obtain base line data for single loop operation.	Bases	Bases Control Program	3
3.4.3, SAFETY/RELIEF VALVES					
3.4.3 - LA1	4.6.E.2	The requirement to disassemble and inspect one safety/relief valve every 24 months.	UFSAR	10 CFR 50.59	3
3.4.3 - LA2	4.6.E.4	The methods for verifying the safety/relief valves ~~has~~ have opened (i.e., while bypassing steam to the condenser, etc) and the detail that the test must be performed in Run.	Bases	Bases Control Program	3
3.4.3 - LA3	4.6.E.1	The requirement that at least 5 of the 11 S/RVs be bench checked or replaced with bench checked valves every 24 months; and that all valves be tested every 48 months.	IST Program	10 CFR 50.59	3
3.4.3 - LA4	N/A	Not used.	N/A	N/A	N/A
3.4.4, RCS OPERATIONAL LEAKAGE					
3.4.4 - LA1	4.6.D.1	The details of the methods for performing this surveillance by utilizing the Primary Containment Sump Monitoring System (equipment drain sump monitoring and floor drain sump monitoring).	Bases	Bases Control Program	3

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.9 - LA2	3.6.A.5.a	The details in CTS 3.6.A.5.a on how to determine the RCS is acceptable for continued operations (perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS).	Bases	Bases Control Program	3
3.4.9 - LA3	4.6.A.6	The method to evaluate the temperature differential using the temperature at the reactor vessel bottom head "drain line."	Bases	Bases Control Program	3
3.4.9 - LA4	N/A	Not used.	N/A	N/A	N/A
3.4.9 - LA5	3.6.A.2, 3.6.A.3, 3.6.A.4	The specific requirements that operation be on or to the right of the curves of Figure 3.6-1 Part 1 or 2.	Bases	Bases Control Program	1
CTS 3/4.6.F, STRUCTURAL INTEGRITY					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION ECCS AND RCIC SYSTEM

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.6.1.1, PRIMARY CONTAINMENT			
3.6.1.1 - LA1	1.0.M	The details concerning the manual isolation valves, automatic isolation valves, that the drywell and pressure suppression chamber are intact, and the requirement that manways are closed for primary containment Operability.	Bases	Bases Control Program	1
3.6.1.1 - LA2	N/A	Not used.	N/A	N/A	N/A
3.6.1.1 - LA3	3.7.A.5.e	The details that the drywell to suppression chamber leakage rate limit of ≤ 71 scfm shall be monitored via the suppression chamber 10 minute pressure transient~~is moved to the Bases Section. ITS SR 3.6.1.1.2 requirement of pressure increase ≤~~ 0.25 in. water/min~~, is sufficient.~~	Bases	Bases Control Program	3
3.6.1.1 - LA4	4.7.A.3	The requirement that when the primary containment is inerted, it shall be continuously monitored for gross leakage by review of the inerting system makeup requirements.	UFSAR	10 CFR 50.59	3
		3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS			
3.6.1.2 - LA1	1.0.M.2	The detail that at least one door in each airlock is closed and sealed~~, adequately address by ITS 3.6.1.2, airlock Operability.~~	Bases	Bases Control Program	1
		3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES			
3.6.1.3 - LA1	4.7.A.2.c	The leakage limits and test pressure for the LPCI/CS air-operated testable check valves.	Bases	Bases Control Program	3
3.6.1.3 - LA2	N/A	Not used.	N/A	N/A	N/A
3.6.1.3 - LA3	N/A	Not used.	N/A	N/A	N/A
3.6.1.3 - LA4	N/A	Not used.	N/A	N/A	N/A

1. Consistency with other LA Summaries. None justify the change, they just describe it

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.4.3, STANDBY GAS TREATMENT SYSTEM					
3.6.4.3 - LA1	3.7.C.1.d	The requirement that secondary containment shall be maintained (SGT System Operable) if the fuel cask is being moved in the reactor building.	UFSAR	10 CFR 50.59	3
3.6.4.3 - LB1	4.7.B.1.f	The requirement to calibrate the SGT System differential pressure switches every 24 months.	TRM/SFAR	10 CFR 50.59	3
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.1, RHRSW SYSTEM					
3.7.1 - LA1	3.5.B.1	The details concerning the number of pumps required in each RHR service water subsystem.	Bases	Bases Control Program	1
1 3.7.1 - LA2	4.5.B.1.c, 4.5.B.1.d	The inservice testing requirements for the RHRSW pumps and valves, including the pump flow rate.	IST Program	10 CFR 50.59, ~~10 CFR 50.55a~~	3
3.7.2, ESW SYSTEM and UHS					
1 3.7.2 - LA1	4.11.D.1.b, 4.11.D.1.d	The inservice testing requirements for the ~~RHRSW~~ ESW pumps and valves, including the pump flow rate and total developed head.	IST Program	10 CFR 50.59, ~~10 CFR 50.55a~~	3
3.7.2 - LA2	4.11.D.2	The detail on how to perform ESW surveillances (i.e., that ESW will not be supplied to RBCLC System during testing).	Bases	Bases Control Program	2
3.7.2 - LA3	3.11.E	The detail that a minimum of 18 heaters out of 88 are required (as modified by DOC M3).	Bases	Bases Control Program	3
3.7.3, CREVAS SYSTEM					
3.7.3 - LA1	3.11.A.1	The details concerning the components of the Main Control Room Emergency Ventilation Subsystem (emergency ventilation air supply fans and fresh air filter trains) required to be OPERABLE.	Bases	Bases Control Program	3
3.7.3 - LB1	4.11.A.4	The requirement to calibrate the temperature transmitters and differential pressure switches every 24 months.	TRM	10 CFR 50.59	3
3.7.4, CONTROL ROOM AC SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

1. Consistent with all other LA DOCs concerning IST Program. Also, this control process was not listed in the DOC

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS					
3.7.5 - LA1	RETS 3.5.a (SR section)	The details of the method of performing the Surveillance to verify the gross gamma activity rate is within limit (by performing an isotopic analysis on a representative sample of gases).	Bases	Bases Control Program	3
3.7.6, MAIN TURBINE BYPASS SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE
3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL					
3.7.7 - LA1	3.10.C	The requirement that whenever irradiated fuel is stored in the spent fuel storage pool, the pool water level shall be maintained at a minimum water level of 33 ft.	UFSAR	10 CFR 50.59	3
CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES					
NONE	NONE	NONE	NONE	NONE	NONE
CTS 3/4.11.C, BATTERY ROOM VENTILATION					
NONE - LA1	3/4.11.C	The Battery Room Ventilation Specification.	TRM	10 CFR 50.59	3

CHANGE TYPE
1. Details of system design and system description including design limits.

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.1, AC SOURCES - OPERATING					
3.8.1 - LA1	3.9.A.1, 3.9.A.1.a	The details of Operability "that power is available to the emergency buses from the following power sources," and the specific design details referring to the "115 kV lines and reserve station transformers."	Bases	Bases Control Program	1, 3
3.8.1 - LA2	4.9.B.3	The requirement to check the EDG instrumentation during monthly generator testing.	TRM	10 CFR 50.59	3
3.8.2, AC SOURCES - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR					
3.8.3 - LA1	4.9.C	The requirement that the quantity of diesel fuel available in each storage tank be manually measured once per month and compared to the reading of the local indicators to ensure proper operation thereof.	TRM	10 CFR 50.59	3
3.8.3 - LA2	4.9.C.1	The fuel oil property limits.	TRM	10 CFR 50.59	3
3.8.4, DC SOURCES - OPERATING					
3.8.4 - LA1	3.9.E.1, 3.9.F.1	The details relating to the components of the DC sources (both batteries and the associated chargers).	Bases	Bases Control Program	1
3.8.4 - LA2	4.9.E.5.a, 4.9.E.5.b, 4.9.F.5.a, 4.9.F.5.b	The details concerning battery degradation (i.e., if the capacity drops more than 10% from its previous performance test (or modified performance test) and if capacity is below 90% of manufacturer's rating), consistent with IEEE-450.	Bases	Bases Control Program	2

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.4 - LA3	4.9.E.6, 4.9.F.1, 4.9.F.6	The details relating to the battery charger weekly visual inspection.	TRM	10 CFR 50.59	3
3.8.4 - LA4	4.9.F.6	The requirement to perform a test of the LPCI MOV independent power supply battery charger every 24 months.	TRM	10 CFR 50.59	3
3.8.5, DC SOURCES - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.8.6, BATTERY CELL PARAMETERS					
3.8.6 - LA1	4.9.E.2.c, 4.9.F.2.c	The detail to measure the temperature of "every fifth cell" (as modified by DCC L3).	Bases	Bases Control Program	3
3.8.7, DISTRIBUTION SYSTEMS - OPERATING					
3.8.7 - LA1	3.9.A.2 3.9.F.1	The details related to the specific buses required to be Operable and the details of what "Operable" means (e.g., energized, in service).	Bases	Bases Control Program	1
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.7, CONTROL ROD TESTING - OPERATING					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.8, SHUTDOWN MARGIN TEST - REFUELING					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
4.0 - LA1	5.1.1, 5.1.2, 5.3, 5.4, 5.6, RETS 1.0.L, RETS Figure 5.1-1	Details of the site features (details of the site location, description, and various structures of the plant), the reactor pressure vessel, the primary and secondary containment, and the seismic design of the reactor building and all engineered safeguards.	UFSAR	10 CFR 50.59	3

CHANGE TYPE

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

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.1, RESPONSIBILITY					
NONE	NONE	NONE	NONE	NONE	NONE
5.2, ORGANIZATION					
5.2 - LA1	Table 6.2-1 note **	The detail that requires ~~two~~ both licensed ROs on shift be in the control room during plant startup or planned shutdown.	UFSAR	10 CFR 50.59	3
5.2 - LA2	6.2.2.6	The details of limiting the working hours of the plant staff and administrative controls on the use of overtime.	Plant Procedures	FitzPatrick procedure control process	3
5.2 - LA3	6.3.2 Note 1	The detail that the 13 individuals who hold SRO licenses and have completed the FitzPatrick Advanced Technical Training Program prior to issuance of License Amendment 111 shall be considered qualified as dual-role SRO/STAs.	UFSAR	10 CFR 50.59	3
5.2 - LA4	Table 6.2-1	The details of the minimum shift crew requirements for the SRO and RO.	UFSAR	10 CFR 50.59	3
5.2 - LA5	RETS 7.1.b	The detail that specifies it is the responsibility of the General Manager-Operations to implement ~~the~~ the Radiological Effluent Technical Specifications (RETS).	QA Program	10 CFR 50.54(a)	3
5.3, PLANT STAFF QUALIFICATIONS					
NONE	NONE	NONE	NONE	NONE	NONE
5.4, PROCEDURES					

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.6 - LA2	RETS 7.3.c, RETS 7.3.d	The details associated with the contents of the Radioactive Effluent Release Report and the Annual Radiological Environmental Operating Report.	ODCM	ODCM Change Control Process in ITS Chapter 5	3
5.7, HIGH RADIATION AREA					
5.7 - LA1	6.11	The details concerning the requirements of the Radiation Protection Program.	UFSAR	10 CFR 50.59	3
CTS 6.0, ADMINISTRATIVE CONTROLS					
None - LA1	6.4	Details that provide requirements for retraining and replacement training for the plant staff.	UFSAR	10 CFR 50.59	3
None - LA2	6.5	Details that set forth requirements for review and approval of programs and procedures, and the review and audit responsibilities of the Plant Operating Review Committee and Safety Review Committee.	QA Program	10 CFR 50.54(a)	3
None - LA3	6.6(B)	Details that set forth requirements for review and approval of reportable events.	UFSAR	10 CFR 50.59	3
None - LA4	6.10	Details that require that certain records be retained.	QA Program	10 CFR 50.54(a)	3
None - LA5	6.16	The details that provide programmatic requirements for the processing of solid radioactive waste and the Process Control Program (PCP).	UFSAR	10 CFR 50.59	3
None - LA6	6.18	Details associated with the reporting requirements of the major modifications to liquid, gaseous, and solid radwaste treatment systems.	ODCM	ODCM Change Control Process in ITS Chapter 5	3
None - LA7	6.17.C.2	Details that set forth Plant Operating Review Committee review and acceptance of changes to the Offsite Dose Calculation Manual.	QA Program	10 CFR 50.54(a)	3

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

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM					
NONE	NONE	NONE	NONE	NONE	NONE
		TOTAL DOSE -			
RETS 5.0, TOTAL DOSE FROM URANIUM FUEL CYCLES					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 6.1, MONITORING PROGRAM					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 6.2, LAND USE CENSUS PROGRAM					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM					

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

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

CHANGE TYPE

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

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

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

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The power transient safety limit has been deleted since failure to meet this safety limit does not necessarily indicate that an actual safety limit has been exceeded.	N/A	1.1.C	1
L2	The reactor vessel water level safety limit is being reduced by 12 inches.	2.1.1.3	1.1.D	1
L3	The time to report a safety limit violation to the NRC has been extended from immediately to 1 hour, in accordance with 10 CFR 50.72. In addition, since the requirement is covered by 10 CFR 50.72, it is not included in the ITS.	N/A	6.7.(B)	6, 9
L4	The Safety Limit Applicability at low power or low flow is changed from reactor pressure ≤ 785 psig or core flow ≤ 10% of rated to reactor pressure < 785 psig or core flow < 10% of rated. The Applicability for the MCPR Safety Limit is relaxed from reactor pressure > 785 psig and core flow > 10% of rated to reactor pressure ≥ 785 psig and core flow ≥ 10% of rated.	2.1.1.1, 2.1.1.2	1.1.A, 1.1.B	2
L5	The Shutdown Cooling Safety Limit is being deleted since it is covered by the Shutdown Cooling System Isolation Reactor Pressure - High instrumentation Allowable Value.	3.3.6.1 Function 6.a	1.2.2	1

CHANGE TYPE

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

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the unit to be placed in COLD SHUTDOWN (MODE 4) within 24 hours if the LCO or action requirements cannot be satisfied because of circumstances in excess of those addressed in the Specification. The ITS allows 37 hours to be in MODE 4.	LCO 3.0.3	3.0.C	6
L2	The CTS has had the following sentence added, "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance." The ITS includes this statement to provide the consistency in scheduling flexibility for all performances of periodic requirements, whether they are Surveillances or Required Actions. The intent remains to perform the activity, on the average, once during each specified interval.	SR 3.0.2	4.0.B	6
L3	When it is determined that a Surveillance was not performed, the CTS allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage time limits of the ACTION requirements are less than 24 hours. The ITS continues to allow a delay, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance Frequency, whichever is less. This change allows the delay to apply to any Surveillance, instead of just those specifications with ACTION requirements of less than 24 hours.	SR 3.0.3	4.0.C	3

CHANGE TYPE

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

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.1, SHUTDOWN MARGIN			
NONE	NONE	NONE	NONE	NONE
	3.1.2, REACTIVITY ANOMALIES			
L1	The CTS does not provide an explicit restoration time when Reactivity Anomalies is not met. The ITS provides a Completion Time of 72 hours for the core reactivity difference to be restored to within limits (normally required to perform an analysis to determine the reason for the reactivity difference).	3.1.2 ACTION A	3.3.D	6
L2	The CTS requirement to be in a cold condition within 24 hours if the reactivity anomaly requirement is not met is being deleted, since the CTS Applicability for this Specification is only power operation (and CTS 3.0.A only requires the ACTIONS to be met during the LCOs Applicability).	N/A	3.3.E	5
	3.1.3, CONTROL ROD OPERABILITY			
L1	Currently in the CTS, a stuck control rod (not fully inserted) that may be stuck as a result of a collet housing failure or for some other reason requires that the reactor be in a cold shutdown condition within 24 hours. No allowance is provided for repair prior to entering the shutdown statement. The ITS allows continued operation with a stuck control rod ~~(X)~~ and the requirement to be in Cold Shutdown has been deleted. With a single withdrawn control rod stuck, the remaining Operable control rods are capable of providing the required scram and shutdown reactivity. In addition, to ensure that local scram reactivity assumptions are maintained in this condition, stuck control rod separation criteria must be verified immediately the stuck control rod must be disarmed within 2 hours to prevent damaging the control rod drive. GNE	3.1.3 ACTION A	3.3.A.2.a	4, 5
L2	The existing CTS surveillance requires that all partially or fully withdrawn control rods be exercised at least once per week. The ITS Surveillances will differentiate between fully and partially withdrawn rods. Fully withdrawn rods will still be exercised once per 7 days. However, partially withdrawn rods will be exercised once per 31 days.	SR 3.1.3.3	4.3.A.2.a	3
L3	Currently in the CTS, if three or more control rods are inoperable but not stuck, all operable control rods must be exercised once every 24 hours. The ITS requirement for control rods that are inoperable but not stuck is to fully insert and disarm the inoperable rod(s). There will be no requirement to exercise the operable rods to verify their operability other than the normal surveillance requirements.	3.1.3 Required Actions C.1 and C.2	4.3.A.2.a	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	Currently in the CTS, if one or more control rods are stuck, all operable control rods must be exercised "at least every 24 hours." In the ITS, after discovery of a stuck rod, all withdrawn control rods are required to be exercised only once within 24 hours when Thermal Power is greater than the low power setpoint of the RWM.	3.1.3 Required Action A.3	4.3.A.2.a	3
L5	The CTS requirement for the CRD housing support to be in place has been deleted since it is included in the Operability requirements for control rods in the ITS.	LCO 3.1.3	3/4.3.B.2	1
L6	CTS 3.3.A.2.a requires the plant to be brought to Cold Shutdown within 24 hours when the requirements for "Inoperable Control Rods" cannot be met. This implies the Applicability of CTS 3.3.A.2.a to be Modes 1, 2 and 3. The Applicability in ITS 3.1.3 is Modes 1 and 2 and the default condition has been changed to Mode 3 as reflected in ITS 3.1.3 Required Action B.1 and E.1.	3.1.3 Applicability, 3.1.3 Required Actions B.1 and E.1	3.3.A.2.a	2, 5
3.1.4, CONTROL ROD SCRAM TIMES				
L1	The CTS requires that 10% of the operable control rods be scram time tested at "16 week intervals." This 16 week interval equates to 112 days. The ITS Frequency for scram time testing a representative sample of control rods is "120 days cumulative operation in MODE 1." Thus, during plant operation the frequency is being extended for 8 days.	SR 3.1.4.2	4.3.C.2	3
L2	The CTS requires an evaluation to be made, whenever scram time surveillances are performed, to provide reasonable assurance that proper control rod drive performance is being maintained. This requirement is essentially a performance tracking requirement to help ensure control rod scram times are maintained within limits and is deleted.	N/A	4.3.C.2	3
L3	The CTS requirement to be in a cold condition within 24 hours when the Scram Insertion Times are not met is being deleted. A new requirement to be in MODE 3 in 12 hours has been added, as described in DOC M5. This action will place the plant outside the Applicability of CTS 3.3.C.1 (reactor power operation).	N/A	3.3.E	5
L4	The CTS requirement to perform scram time testing at saturation temperatures has been deleted. This change will allow scram time testing to be performed during reactor hydrostatic pressure testing when the reactor vessel is not at saturated conditions.	N/A	4.3.C.1	3
3.1.5, CONTROL ROD SCRAM ACCUMULATORS				

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	The CTS includes an action to restore certain components (e.g., tank heaters) or variables (e.g., sodium pentaborate volume-concentration and temperature requirements) within 8 hours or take action to be in hot shutdown in the next 12 hours. All the components or variables discussed in this CTS action will cause both subsystems of the SLC System to be inoperable. However, the list is not all inclusive of the possible events which could lead to both subsystems being inoperable. The ITS adds an ACTION to allow the entire SLC System (e.g., both pumps) to be inoperable for any reason up to 8 hours prior to requiring a plant shutdown. The 8 hours provides time to restore minor problems (e.g., some pump inoperabilities) prior to requiring a plant shutdown.	3.1.7 ACTION B	3.4.C	5
L3	The CTS requires that when a SLC subsystem or component becomes inoperable, the redundant subsystem or component be verified to be OPERABLE immediately and daily thereafter. The ITS does not have this cross system check. This change will allow credit to be taken for normal periodic Surveillances as a verification of OPERABILITY and availability of the remaining SLC subsystem.	N/A	4.4.B	4
L4	The CTS requires that each SLC subsystem "valve (manual, power operated, or automatic) in the system flowpath that is not locked, sealed or otherwise secured in position, is in the correct position" once per 31 days. The ITS requires that "each SLC subsystem manual valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position, or can be aligned to the correct position" every 31 days. The proposed change permits the SLC subsystem to be considered OPERABLE as long as the valves can be manually realigned to their correct position.	SR 3.1.7.6	4.4.A.1	3
L5	The CTS requires that every 24 months demineralized water be injected into the reactor vessel to test that valves (except explosive valves) not checked by the recirculation test are not clogged. This test involves testing entire subsystems; including portions common to both subsystems as well as non-common portions. As such, testing either subsystem can satisfy the necessary testing for the common portions of both subsystems. To accomplish this, the ITS requires the verification of flow through one SLC subsystem from the pump into reactor pressure vessel every 24 months on a STAGGERED TEST BASIS (i.e., such that the subsystems use for the test are alternated each 24 months). Since the CTS could be inferred to require testing both subsystems each 24 months, this change is a relaxation in the frequency of testing an individual subsystem (i.e., on the Staggered Test Basis).	SR 3.1.7.8	4.4.A.5	3
3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES				

the

d

5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
(1) ~~10. Relaxation of Surveillance Frequency from 18 Months to 24 Months~~

1. Not used in Table or described in front matter of SER

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

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

1. Not used in Table or described in front matter of SER

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.1.1, RPS INSTRUMENTATION			
L1	The CTS Applicability of Mode 5 (i.e., reactor is subcritical, fuel is in the vessel and the reactor temperature is less than 212 °F) for the Mode Switch in Shutdown, Manual Scram, and IRM High Flux Trip Functions and the CTS Applicability of Mode 5 for the IRM Inoperative Function, is being relaxed. In the ITS, the above Functions are only required to be Operable in Mode 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	Table 3.3.1.1-1 for Functions 1.a, 1.b, 10, and 11	Table 3.1-1 Trip Functions 1, 2, 3, and 4, including Note 7	2
L2	The CTS provides 4 hours to reach Mode 3 (all rods inserted). In the ITS, the time to reach Mode 3 is 12 hours.	3.3.1.1 Required Action G.1	Table 3.1-1 Note 3.A	6
L3	The CTS (for Mode Switch in Shutdown, Manual Scram, IRM High Flux, IRM Inoperative, and High Water Level in Scram Discharge Volume Functions) requires the insertion of all operable control rods if the channels are not restored or tripped within the allowed completion times. In the ITS, when in MODE 5, only control rods in core cells containing one or more fuel assemblies are required to be inserted.	3.3.1.1 Required Action H.1	Table 3.1-1 Note 3.A	4
L4	The CTS requires the APRM Neutron Flux - Startup and APRM Inoperative Functions to be Operable in MODE 5. The ITS does not require these Functions during Mode 5 operations.	N/A	Table 3.1-1 Trip Functions 5 and 8, including Note 7, 2.1.A.1.b	2
L5	The CTS requirement associated with the Main Steam Isolation Valve Closure Function to insert all Operable control rods (be in MODE 3) within 4 hours is being relaxed. The ITS will require the plant to be in MODE 2 within 8 hours when the Main Steam Isolation Valve Closure Function is inoperable and not restored, or channels tripped, within the required Completion Times, consistent with the Applicability.	3.3.1.1 Required Action F.1	Table 3.1-1 Note 3.A	4
L6	The design details that identify the reliability group (A, B or C) to which each instrument belongs for functional testing has not been included in the ITS.	N/A	Table 4.1-1 (including Note 6), Table 4.1-2 (including Note 1)	3
L7	The details that identify those portions of the instrument channel which require functional testing and the details that identify the type of test equipment used to perform a channel calibration have been deleted.	N/A	Table 4.1-1	3
L8	The details concerning testing the automatic scram contactors after maintenance is not included in the ITS since it is adequately covered by SR 3.0.1.	SR 3.0.1	Table 4.1-1 Note 1	3

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L9	Not used.	N/A	N/A	N/A
L10	The ITS includes a Note to allow entry into Mode 2 from Mode 1 for up to 12 hours prior to requiring the Channel Functional Test to be performed on the IRM High Flux, IRM Inop, and APRM Neutron Flux - High (Startup) Functions.	SR 3.3.1.1.3 Note	N/A	3
L11	The details relating to the Instrument I.D. numbers for the RPS Instrumentation are not included in the ITS.	N/A	4.1.A	3
L12	The ITS includes a Note states that the APRM heat balance calibration Surveillance is not required to be performed until 12 hours after Thermal Power ≥ 25% RTP.	SR 3.3.1.1.2 Note	N/A	3
L13	The CTS Frequency for performing the APRM heat balance calibration is being changed from once per day in the CTS to once per 7 days in the ITS.	SR 3.3.1.1.2	Table 4.1-2 Calibration requirement for Instrument Channel 2	3
L14	The Trip Settings/Trip Level Settings (changed to Allowable Value in DOC A19) are being changed a) for the Turbine Stop Valve Closure Function from ≤ 10% valve closure in the CTS to ≤ 15% valve closure in the ITS; and b) for the Turbine Control Valve Fast Closure Function from > 500 psig and < 850 psig in the CTS to ≥ 500 psig and ≤ 850 psig in the ITS.	Table 3.3.1.1-1 Allowable Values for Functions 8 and 9	2.1.A.3, 2.1.A.4, Table 3.1-1 Trip Level Setting for Trip Functions 14 and 15	1
3.3.1.2, SRM INSTRUMENTATION				
L1	The CTS does not provide any actions if the required SRMs are inoperable in Mode 2; thus a shutdown to cold shutdown is required. In the ITS, 4 hours will be allowed to restore the 3 required SRM channels to Operable prior to requiring a shutdown. Also, when there are no Operable SRMs, the ITS will further require suspension of all control rod withdrawal (and continue to allow the 4 hours to restore the inoperable SRMs).	3.3.1.2 ACTIONS A and B	N/A	5
L2	The CTS requires two SRMs to be Operable; one in the core quadrant where fuel or control rods are being moved and one in an adjacent quadrant. If a spiral offload or spiral reload is being performed, the ITS will allow only 1 SRM to be Operable, provide that the fueled region includes only that SRM detector. An appropriate SR has been added to ensure this condition, and a Note included to allow one SRM to satisfy multiple location requirements.	Table 3.3.1.2-1 footnote (b), SR 3.3.1.2.2.a, SR 3.3.1.2.2 Note 2	3.10.B	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS requires SRM operability to be verified during spiral reload by using a portable external source every 12 hours until the required amount of fuel is loaded to maintain 3 cps. An alternative is provided to load a maximum of four fuel assemblies in different cells containing control blades around each SRM to obtain the required 3 cps. The ITS includes a Note that relaxes the 3 cps requirement with less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies in the associated core quadrant.	SR 3.3.1.2.4 Note	3.10.B.4	3
L4	With the SRM requirements not met, the CTS requires a shutdown to cold shutdown (Mode 4). In the ITS, a shutdown only to Mode 3 is required.	3.3.1.2 Required Action C.1	LCO 3.0.C	5
	3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION			
L1	The requirements when one RBM channel is inoperable concerning verifying operations are not on a limiting control rod pattern or if not, then ensuring control rod withdrawal is block, when one RBM channel is inoperable have been deleted. ed	N/A	Table 3.2-3 Note 2 Action B.a), 3.3.B.5	5
L2	The CTS requirement to perform an instrument check on the RBM - Upscale and -Downscale Functions has been deleted. #	N/A	Table 4.2-3 Instrument Check requirements for Instrument Channels 6 and 7	3
L3	The CTS requires a demonstration of the rod block function of the RWM (i.e., a Channel Functional Test) be performed during a startup prior to the start of control rod withdrawal. In the ITS, the Frequency for the RWM Channel Functional Test is specified as 92 days. Thus if two startups are performed within 92 days of each other, a test prior to the second startup will not be required. In addition, a Note to the ITS Surveillance allows the test to be performed up to 1 hour after withdrawal of the first control rod.	SR 3.3.2.1.2	4.3.B.3.a.(4)	3
L4	The Frequency to verify the correctness of the RWM program sequence during startup prior to the start of control rod withdrawal and during shutdown prior to attaining 10% rated power during rod insertion has been changed in the ITS to require the verification only prior to declaring RWM OPERABLE following loading of the Sequence into RWM.	SR 3.3.2.1.8	4.3.B.3.a, 4.3.B.3.b	3
L5	The ITS includes a Note that excludes the neutron detectors from the RBM - Upscale and -Downscale Functions Channel Calibration Surveillance. #	SR 3.3.2.1.5 Note	N/A	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires the plant to be in cold shutdown within 24 hours when the one required containment high range radiation monitor has not been restored to operable status within 30 days. In the ITS, when both required containment high range monitors are inoperable and not restored within the allowed time, in lieu of a plant shutdown, a special report is required to be submitted to the NRC.	3.3.3.1 Required Action F.1	Table 3.2-8 Note A	5
L5	Not used.	N/A	N/A	N/A
L6	The CTS Channel Check Frequency is being changed from daily in the CTS to every 31 days in the ITS.	SR 3.3.3.1.1	Table 4.2-8 Instrument Check requirement	3
1 L7	A Note has been added to allow a channel to be Inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	SR 3.3.3.1 Note	N/A	6
		Surveillance Requirements		
	3.3.3.2, REMOTE SHUTDOWN SYSTEM			
1 L1	A Note has been added to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances.	SR 3.3.2 Note	N/A	6
L2	The CTS requirement to perform a Functional Test on each required remote shutdown system control circuit is proposed to be changed to verify each required Remote Shutdown System transfer switch and control switch performs the intended function. This change includes changing the manner of performance of this SR from operating each actuated component from the associated control panel (e.g., Remote Shutdown Panel) to allowing performance of a continuity check to confirm Operability (as specified in the Bases).	SR 3.3.3.2.2 (including Bases description)	Table 3.2-10 Functional Test requirement	3
	3.3.4.1, ATWS-RPT INSTRUMENTATION			
L1	The CTS allows 72 hours to place an inoperable instrument channel in trip if one channel is inoperable for one or more Trip Functions. The ITS will allow 14 days to restore the channel to operable status or to place the associated channel in trip.	3.3.4.1 Required Actions A.1 and A.2	Table 3.2-7 Note 1.a	6

1. Consistent with 3.3.7.3 DOC L2

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	When two or more channels are inoperable for one or more Functions, the CTS requires that the instrument channel(s) in one trip system and/or that trip system be in the tripped condition within 6 hours and requires the remaining channel in the other trip system to be restored to Operable status within 24 hours. In addition, the CTS will allow only one hour to restore trip capability for each Function. In the ITS, if two channels are inoperable for the same Function and trip capability is maintained, 14 days is allowed to restore or trip the channel. In addition, if only one Trip Function's capability is lost, the ITS will allow the restoration of ATWS-RPT trip capability in 72 hours. When both Trip Function's capability is lost, the ITS provides 1 hour to restore ATWS-RPT trip capability for one Trip Function, consistent with the CTS.	3.3.4.1 ACTIONS A, B, and C	Table 3.2-7 Note 1.b	4
L3	The CTS requires the plant be placed in the startup/hot standby mode (Mode 2) if the inoperable channels are not restored/tripped within the allowed times. In the ITS, an additional option is provided if the inoperable channel(s) are the result of inoperable RPT breaker. If this is the case, then the ITS will allow removal of the affected recirculation pump from service in lieu of being in Mode 2.	3.3.4.1 Required Action D.1 (including Note)	N/A	5
	GN			
	3.3.5.1, ECCS INSTRUMENTATION			
L1	Not used.	N/A	N/A	N/A
L2	The CTS requires restoration of an inoperable CS or LPCI Reactor Pressure-Low (Injection Permissive) channel; placing the channel in the tripped condition is not allowed. In the ITS, the inoperable channels are allowed to be placed in the tripped condition during MODE 4 or 5 operations.	3.3.5.1 ACTION B	Table 3.2-2 Note 6	4
L3	The CTS Reactor Pressure — Low (Recirculation Discharge Valve Permissive) Function is currently required to be Operable whenever the associated Low Pressure Coolant Injection (LPCI) System is required to be Operable (Modes 1, 2, 3, 4, and 5). In the ITS, the Function is only required to be Operable in MODE 1, 2 and 3 when the associated discharge valve is open.	Table 3.3.5.1-1 Function 2.d, including footnote (c)	3.2.B, Table 3.2-2 Item No. 24	2
L4	The CTS require action to be taken in 1 hour upon discovery of loss of initiation capability for the LPCI and CS Systems. In the ITS, these same actions are only required to be taken during MODES 1, 2 and 3.	3.3.5.1 Required Action B.1 Notes 1 and 2, 3.3.5.1 Required Action C.1 Notes 1 and 2	Table 3.2-2 Notes 2.A and 6.A	4

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	Not used.	N/A	N/A	N/A
L6	The Trip Level Settings (changed to Allowable Value in DOC A12) are being changed a) for the Containment High Pressure Function from > 1 psig and < 2.7 psig in the CTS to ≥ 1 psig to ≤ 2.7 psig in the ITS; b) for the Reactor Low Pressure (injection permissive) Function from ≥ 450 psig in the CTS to ≥ 410 psig and ≤ 490 psig in the ITS; and c) for the Reactor Low Pressure (recirculation discharge valve permissive) Function from 285 psig to 335 psig in the CTS to ≥ 295 psig in the ITS.	Table 3.3.5.1-1 Allowable Values for Functions 1.c, 2.c, 2.d, and 2.h	Table 3.2-2 Trip Level Setting for Item Nos. 6, 9, and 24	1
L7	The Trip Level Settings (changed to Allowable Value in DOC A12) are being changed a) for the Core Spray Pump Start Time Function from 11 ± 1.34 seconds in the CTS to ≤ 12.34 seconds in the ITS; and b) for the RHR Pump Start Timers Function from 1.25 ± 0.26 seconds for the first pump in loops A and B and 6.0 ± 0.73 seconds for the second pump in loops A and B in the CTS to ≤ 1.51 seconds for the A and D pumps and ≤ 6.73 seconds for the B and C pumps in the ITS.	Table 3.3.5.1-1 Allowable Values for Functions 1.d and 2.f	Table 3.2-2 Trip Level Settings for Item Nos. 11 and 12	1
3.3.5.2, RCIC SYSTEM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION				
L1	The CTS Safety Limit and actions when operating the RHR System in the Shutdown Cooling Mode are incorporated into the SDC Reactor Pressure-High Isolation Function. As such the ITS Applicability for the Function is only MODES 1, 2, and 3, and the actions if the channels are inoperable and not tripped within allowed time is to isolate the affected penetration.	Table 3.3.6.1-1 Function 6.a, 3.3.6.1 ACTION F	1.2.2, 2.2.2	1, 2
L2	The details relating to the Instrument I.D. numbers for the primary containment isolation instrumentation are not included in the ITS.	N/A	4.2.A, Table 3.2-8 Instrument 4	1
L3	The CTS Applicability for the SDC Reactor Low Water Level Function is MODES 1, 2, and 3 (when primary containment is required). The ITS does not include the Modes 1 and 2 Applicability for this Function. In addition, the CTS requirement that the Drywell Pressure High Function be Operable in Modes 1, 2, and 3 for the SDC isolation is also not included in the ITS.	Table 3.3.6.1-1 Function 6.b	Table 3.2-2 Trip Functions 1 and 5	1, 2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable RWCU reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L5	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable SDC reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, immediate action must be initiated to restore the channels to Operable status or to isolate the RHR SDC System.	3.3.6.1 ACTION J	Table 3.2-1 Note 3.A	5
L6	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable recirculation loop sample and recirculation pump seal purge penetrations reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L7	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable Main Steam Lines and drains reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, an optional action is provided to allow the affected main steam line to be isolated within 12 hours.	3.3.6.1 Required Action D.1	Table 3.2-1 Note 3.A	5
L8	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable hydrogen and oxygen sample lines and gaseous/particulate sample supply and return lines reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L9	The CTS requires the isolation of the affected main steam lines within 8 hours when the inoperable main steam line high flow and condenser vacuum low channels are not tripped within the allowed times. In the ITS, in lieu of isolating the affected lines within 8 hours, an optional action is provided to place the plant in Mode 3 within 12 hours and Mode 4 within 36 hours.	3.3.6.1 Required Actions D.2.1 and D.2.2	Table 3.2-1 Notes 3.B and 3.G	5
L10	When more than one channel associated with a trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the associated Function. These actions must be taken even if primary containment isolation capability is maintained. The ITS will not include this requirement; 12 or 24 hours will be allowed (depending upon whether or not the channel is common to RPS) to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L11	The CTS provides 24 hours to reach cold shutdown (Mode 4). In the ITS, the time to reach Mode 4 is 36 hours.	3.3.6.1 Required Actions D.2.2 and H.2	Table 3.2-1 Note 3.A	6
L12	The CTS provides 8 hours to close the MSIVs. In the ITS, the time to close the MSIVs is 12 hours.	3.3.6.1 Required Action D.1	Table 3.2-1 Notes 3.B and 3.G	6
L13	The CTS Applicability for the Main Steam Line (Tunnel) High Radiation Function is MODES 1, 2, and 3 (i.e., when primary containment is required). In the ITS, the Applicability for this Function is MODES 1 and 2 with THERMAL POWER ≤ 10% RTP.	Table 3.3.6.1-1 Functions 1.f and 2.f	Table 3.2-1 Trip Function 7, including Note 1	2
L14	The details that identify those portions of the instrument channel which require functional testing and the details that identify the type of test equipment used to perform a channel calibration have been deleted.	N/A	Tables 4.1-1 and 4.1-2	3
(1) L15 Not used.	~~The CTS requires the isolation of the affected main steam lines within 8 hours when the inoperable main steam line low pressure channels are not tripped within the allowed times. In the ITS, in lieu of isolating the affected lines within 8 hours, the plant must be placed in Mode 2 within 8 hours.~~	~~3.3.6.1 ACTION E~~ N/A	~~Table 3.2-1 Note 3.B~~ N/A	~~5~~ N/A
L16	The Trip Level Settings (changed to Allowable Value in DOC A16) for the HPCI Turbine Steam Line High Flow Function is changed from ≤ 160 inches of water dP in the CTS to ≤ 168.24 inches of water dP in the ITS.	Table 3.3.6.1-1 Allowable Value for Function 3.a	Table 3.2-1 Trip Level Setting for Trip Function 13	1
L17	The Trip Level Settings (changed to Allowable Value in DOC A16) for the Main Steam Line High Flow Function is changed from ≤ 140% of rated steam flow in the CTS to ≤ 125.9 psid in the ITS.	Table 3.3.6.1-1 Allowable Value for Function 1.c	Table 3.2-1 Trip Level Setting for Trip Function 9	1
L18	The ITS includes an allowance to open, under administrative controls, penetration flow paths closed to comply with the Actions.	3.3.6.1 ACTIONS Note 1	N/A	4
L19	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable TIP System reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 24 hours. Due to this change, the TIP System Functions listed above are called out as separate line items in the ITS.	3.3.6.1 ACTION G, Table 3.3.6.1-1 Functions 7.a and 7.b	Table 3.2-1 Note 3.A	5

1. Revision I change

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION			
L1	When more than one channel associated with a trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the associated Function. These actions must be taken even if secondary containment isolation capability is maintained. The ITS will not include this requirement; 12 hours will be allowed to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6
L2	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the associated secondary containment penetration flow paths must be isolated and the associated SGT subsystems must be placed in operation within 1 hour, or the associated features (SCIVs and SGT subsystems) must be declared inoperable within 1 hour.	3.3.6.2 ACTION C	Table 3.2-1 Note 3.A	5
L3	Not used.	N/A	N/A	N/A
L4	The RETS requires the associated secondary containment penetration flow paths to be isolated and the associated SGT subsystems to be placed in operation when the inoperable refuel area exhaust monitors or reactor building area exhaust monitors channels are not restored to Operable status within the allowed times. In the ITS, in lieu of the requirements above when the channels are not restored, an optional action is provided to declare the associated features (SCIVs and SGT subsystems) inoperable within 1 hour.	3.3.6.2 Required Actions C.1.2 and C.2.2	RETS Table 3.10-1 Note d	5
L5	Not used.	N/A	N/A	N/A
L6	Not used.	N/A	N/A and 4.1-2	N/A
(1) L7	The details that identify those portions of the instrument channel which require functional testing and an instrument check and the detail of the method of calibration have been deleted.	N/A	Table 4.1-1 RETS Table 3.10-2	3
L8	The RETS requires both trip systems to have at least one operable or tripped refuel area radiation monitor and reactor building area radiation monitor channel; however no actions are provided if trip capability is lost. The ITS includes an ACTION to allow 1 hour to restore isolation capability, if it is not maintained.	3.3.6.2 ACTION B	RETS Table 3.10-1	4

1. Revision I change

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.7.1, CREVAS SYSTEM INSTRUMENTATION			
NONE	NONE	NONE	NONE	NONE
	Not isolated and any main steam line not isolated			
	3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION			
L1	The RETS requires the mechanical vacuum pump to be capable of being automatically isolated and secured whenever the main steam isolation valves are open. The Applicability is very broad and includes MODES 1, 2, 3, 4 and 5. Also, the CTS requires the function to be operable whenever the primary containment integrity is required by CTS 3.7.A.2, which is essential Modes 1, 2, and 3. The Applicability of the ITS will be during MODES 1 and 2 with whenever any condenser air removal pump is in service, since this is when the vacuum pumps need to be isolated. In addition, the CTS requires the air removal pumps to be isolated when the main steam line tunnel high radiation channels are inoperable and not tripped. In lieu of this action, the ITS provides an optional action to isolate the main steam lines or to be in Mode 3.	3.3.7.2 Applicability, 3.3.7.2 Required Actions C.2 and C.3	RETS 3.9.a, Table 3.2-1 Notes 1 and 3.E	2, 5
L2	When more than one channel associated with the main steam line tunnel high radiation trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the Function. These actions must be taken even if condenser air removal pump isolation capability is maintained. The ITS will not include this requirement; 24 hours will be allowed to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6
L3	The CTS provides 8 hours to isolate the mechanical vacuum (air removal) pump. In the ITS, the time to isolate the air removal pump is 12 hours.	3.3.7.2 Required Action C.1	Table 3.2-1 Note 3.E	6
L4	The RETS stipulates a "simulated" automatic actuation test of the condenser air removal pump isolation shall be performed. The ITS allows use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that the air removal pump isolates on the proper signal.	SR 3.3.7.2.4	RETS Table 3.10-2 Note f	3
L5	The details identifying how the Logic System Functional Test is to be performed (i.e., where possible using test jacks) has been deleted.	N/A	RETS Table 3.10-2 Note f	3
	3.3.7.3, ESW SYSTEM INSTRUMENTATION			

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS does not provide any specific actions for when the instrumentation is inoperable, thus the actions for inoperable ESW subsystems must be taken. Since each channel provides input to both ESW subsystems, both subsystems would have to be declared inoperable; and since the CTS does not provide any actions for both ESW subsystems inoperable, a shutdown per LCO 3.0.C would be required. In lieu of this shutdown action, the ITS provides three ACTIONS that allows operation to continue with inoperable channels if certain conditions are met. If one or more channels are inoperable, 24 hours is allowed to place the inoperable channels in trip. If isolation capability is not maintained in both trip systems, then 1 hour is permitted to restore initiation capability. Finally, if the two above listed actions are not met, then the associated ESW subsystem(s) must be declared inoperable.	3.3.7.3 ACTIONS A, B, and C	LCO 3.0.C	5
L2	The ITS includes a Note that allows placing a channel in an inoperable status solely for the performance of required Surveillances, without entering the associated Conditions and Required Actions for up to 6 hours provided the associated Function maintains initiation capability.	Surveillance Requirements Note	N/A	4
L3	The CTS requirement to perform an ESW instrumentation check once per day has been deleted, since there are no pressure indicators or recorders associated with this instrumentation.	N/A	4.11.D.1.e	3
L4	The CTS requires the Emergency Diesel Generator (EDG) System be demonstrated Operable immediately and at least daily thereafter if the ESW System (i.e., the ESW instrumentation) is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	3
L5	The CTS requires the Emergency Diesel Generator System emergency loads be verified Operable immediately and at least daily thereafter if the ESW System (i.e., the ESW instrumentation) is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	3
3.3.8.1, LOP INSTRUMENTATION				
L1	The CTS Trip Level Settings (changed to Allowable Values) for the 4.16 kV Emergency Bus Undervoltage Loss of Voltage, Degraded Voltage, and Time Delay Functions have been changed in the ITS, consistent with recent setpoint calculations.	Table 3.3.8.1-1 Allowable Values for Functions 1.a, 1.b, 2.a, 2.b, and 2.c	Table 3.2-2 Trip Level Settings for Item Nos. 19, 20, 21, 22, and 23	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.8.2, RPS ELECTRIC POWER MONITORING			
L1	The CTS does not provide specific Applicability requirements for the RPS electric power monitoring assemblies (EPAs); however, the CTS Bases for this Specification and Amendment 76 to the JAFNPP Operating License specify that this protection is for the RPS. CTS Table 3.1-1 requires the RPS instrumentation to be Operable when in the refuel, startup and run modes. The CTS Applicability can be implied to be Modes 1, 2 , and 5. In the ITS, the Applicability for the RPS Electric Power Monitoring is MODES 1 and 2, and MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies; the assemblies are now only required in Mode 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies.	3.3.8.2 Applicability 5 3, 4, and 5	3.9.G Bases, Amendment 76, Table 3.1-1	2
L2	The time to remove the associated power supply from service when both RPS electric power monitoring assemblies are inoperable is being extended from 30 minutes in the CTS to 1 hour in the ITS.	3.3.8.2 Required Action B.1	3.9.G.2	6
L3	The CTS does not provide any actions if the associated power supply is not removed from service; thus a plant shutdown to cold shutdown (Mode 4) is required. In the ITS, the plant is only required to be placed in Mode 3, consistent with the Applicability.	3.3.8.2 ACTION C	N/A	5
L4	The CTS requires that at least one RPS division be powered from its respective motor generator while in MODE 1. If both RPS divisions are powered from the alternate power supply, there is a 7 day allowable outage time to restore at least one of the motor generator power supplies to Operable status, or the reactor is required to be placed in a cold condition within the next 24 hours. This requirement and action ~~is~~ are not included in the ITS.	N/A	3.9.G.3	1, 4
L5	The CTS stipulates a "simulated" automatic actuation test of the RPS Electric Power Monitoring Assemblies shall be performed. The ITS allows use of an "actual" actuation signal (as identified in the Bases), in addition to the simulated automatic actuation signal, for verifying that the RPS Electric Power Monitoring Assemblies actuate on the proper signal.	SR 3.3.8.2.4, including Bases	4.9.G.2	3

1. Revision I change

The MODES 3 and 4 requirement is necessary due to an allowance in ITS 3.10.3 and ITS 3.10.4 that allows a single control rod to be withdrawn in MODE 3 or 4.

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability

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

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS allows continued operation for 30 days if only one monitor of the continous Atmospheric Monitor System (gaseous or particulate) is inoperable. The CTS also requires a grab sample to be taken every 24 hours during the 30 day period. If both are inoperable, a shutdown per CTS 3.0.C is required. The ITS will allow one of the two monitors to be inoperable indefinitely, provided SR 3.4.5.1, a CHANNEL CHECK, is performed on the remaining Operable Containment Atmospheric Monitoring System monitor, every 8 hours. The ITS will also allow both Containment Atmospheric Monitoring Systems monitors to be inoperable for 30 days, provided a grab sample is taken every 12 hours. Also, to be consistent with the format of the ITS, the term "one channel" is used in the ITS in lieu of defining in the LCO section of the Bases that the System is OPERABLE if only one of the two gaseous monitors (channels) and one of the two particulate monitors (channels) are OPERABLE.	LCO 3.4.5, 3.4.5 ACTIONS B and C	3.6.D.4, 3.6.D.6	1, 6
L2	The CTS requires that an inoperable sump monitoring system be restored to OPERABLE status within 24 hours. The ITS requires an inoperable drywell sump monitoring system be restored to OPERABLE status within 30 days. However, this 30 day Completion Time is allowed provided RCS unidentified and total LEAKAGE can still be determined every 4 hours.	3.4.5 ACTION A	3.6.D.5	6
L3	A statement that LCO 3.0.4 is not applicable for the condition of the drywell floor drain sump monitoring system inoperable or both drywell atmospheric monitors inoperable has been added as a Note to the ITS ACTIONS. Currently, this allowance is not provided.	3.4.5 ACTIONS A and C Notes	N/A	7
L4	The CTS requirement that an instrument check be performed on the drywell floor drain sump monitor once per day is not included in the ITS.	N/A	Table 4.2-5	3
L5	The drywell equipment drain sump monitoring system functions to quantify identified leakage. Since the purpose of ITS 3.4.5, RCS Leakage Detection Instrumentation, is to provide instrumentation requirements for early identification of unidentified leakage, the drywell equipment drain sump monitoring system requirements have been deleted.	N/A	3.6.D.4, 3.6.D.5, 4.6.D.4, Table 3.2-6, Table 4.2-5	1
L6	A Note has been added to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other Leakage Detection System channel is OPERABLE.	~~3.4.5~~ Surveillances	N/A	6
	3.4.6, RCS SPECIFIC ACTIVITY	Requirements Note		
L1	The CTS requires that the reactor not be operated more than 5% of its annual power operation with the reactor coolant specific activity in excess of 0.2 µCi/gm DOSE EQUIVALENT I-131. This requirement is not adopted in the ITS, in accordance with the recommendations in Generic Letter 85-19, Reporting Requirements on Primary Coolant Iodine Spikes.	N/A	3.6.C.1	1

1. Consistent with 3.3 DOCs

9. Elimination of CTS Reporting Requirement
1 ~~10. Relaxation of Surveillance Frequency from 18 Months to 24 Months~~

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.1, ECCS - OPERATING			
L1	CTS requirements for actuation testing of CS, LPCI, HPCI, and ADS stipulate a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirements for verifying that each ECCS subsystem actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirements.	SR 3.5.1.10, SR 3.5.1.11	4.5.A.1.a, 4.5.A.3, 4.5.C.1, 4.5.D.1.a, Table 4.2-2 Note 7	3
L2	CTS 4.5.A.2 requires the immediate verification that the remaining Core Spray (CS) subsystem and both low pressure coolant injection (LPCI) subsystems are Operable whenever it is determined that one CS subsystem is determined to be inoperable. It also requires the verification that the remaining CS subsystem is Operable daily thereafter. CTS 4.5.A.3.a requires the immediate and daily verification that the remaining LPCI subsystem and both CS subsystems are Operable whenever it is determined that one LPCI subsystem is determined to be inoperable. It also requires the verification that the remaining CS subsystem is Operable daily thereafter. CTS 4.5.C.1.a requires that both LPCI subsystems, both CS subsystems, and the ADS System actuation logic be verified to be Operable immediately when it is determined that HPCI is determined to be inoperable. It also requires that the RCIC System and the ADS System logic be verified to be Operable daily thereafter. When it is determined that two ADS valves are inoperable, CTS 4.5.D.2.a requires the ADS System actuation logic for the operable ADS valves and the HPCI System be verified to be Operable immediately and at least weekly thereafter. Finally, CTS 4.5.D.2.b requires that when it is determined that more than two relief/safety valves of the ADS are inoperable, the HPCI System shall be verified to be Operable immediately. These explicit verifications have all been deleted.	N/A	4.5.A.2, 4.5.A.3.a, 4.5.C.1.a, 4.5.D.2.a	4
L3	The pressure at which ADS is required to be Operable is proposed to be increased from >100 psig to > 150 psig to provide consistency with the Operability requirements for HPCI. Along with this change the default action of the CTS to reduce pressure to less than 100 psig has been changed to reduce reactor steam dome pressure to ≤ 150 psig consistent with the proposed Applicability.	3.5.1 Applicability, 3.5.1 Required Action G.2	3.5.D.1.a, 3.5.D.2	2

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for LPCI or CS cannot be satisfied, requires that the reactor be in the cold condition and reactor pressure be reduced to less than 150 psig within 24 hours when the ACTIONS for HPCI cannot be satisfied, requires that the reactor be placed in the cold condition and that reactor pressure be reduced to less than 100 psig (modified by DOC L3) within 24 hours when the Required Actions for inoperable ADS valves cannot be satisfied, and requires that the reactor shall be brought to cold condition within 24 hours when both LPCI independent power supplies are made or found to be inoperable. This specific default action has been interpreted to also require entry when the ACTIONs or Completion Times associated with one inoperable LPCI independent power supply are not met since no other exists. The ITS extends the time allowed for the plant to reduce pressure or be in MODE 4 from 24 hours to 36 hours.	3.5.1 Required Actions B.2 and G.2	3.5.A.6, 3.5.C.1.b, 3.5.D.2, 3.9.F.3	6
L5	The CTS allows continued operation for a maximum of 7 days after HPCI only is determined to be inoperable. The ITS allows continued operation for a maximum of 14 days under the same conditions.	3.5.1 Required Action C.1	3.5.C.1.a	6
L6	The CTS allows continued operation for a limited time if HPCI is inoperable only if the ADS subsystem, the RCIC System, both LPCI subsystems and both core spray subsystems are Operable. The ITS will allow continued operation for 72 hours if HPCI and one low pressure ECCS subsystem are inoperable or HPCI and one LPCI pump in each LPCI subsystem are inoperable.	3.5.1 ACTION D	3.5.C	4
L7	The flow rates specified in the CTS for the Low Pressure Injection System and the High Pressure Injection System have been decreased from 8910 gpm to 7700 gpm and from 4250 gpm to 3400 gpm, respectively, consistent with the values used in the plant specific LOCA analysis reflected in NEDC-31317P (James A. FitzPatrick Nuclear Power Plant SAFER/GESTR-LOCA Loss of Coolant Accident Analysis). Should be a space	SR 3.5.1.7, SR 3.5.1.8	4.5.A.3, 4.5.C.1	3
L8	The CTS requires that with one low pressure coolant injection pump inoperable in each subsystem, the plant shutdown in accordance with the CTS 3.0.C, implying that the plant is outside design basis. This condition is not outside design basis, thus the ITS allows continued operation for 7 days in this condition.	3.5.1 Condition A (second part)	3.5.A.3.a	5
L9	The details in the CTS related to the specific inverter buses (MCC-155 and MCC-165) required to be in service are not necessary to ensure the LPCI inverter and buses remain Operable. Therefore, they have not been included in the ITS.	N/A	3.9.F.1	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.2, ECCS - SHUTDOWN			
L1	The CTS requires immediate suspension of OPDRVs when one of the two required low pressure ECCS subsystems are inoperable. The ITS will allow 4 hours to restore one required ECCS injection/spray subsystem to OPERABLE status, since the remaining OPERABLE subsystem can provide sufficient vessel flooding capability to recover from an inadvertent vessel draindown.	3.5.2 ACTION A	3.5.F.4	6
L2	The CTS requires the suppression pool water level and Condensate Storage Tank (CST) level to be verified to be within the specified limits once per 8 hours. The ITS will require these verifications every 12 hours.	SR 3.5.2.1, SR 3.5.2.2	4.5.F.3, 4.5.F.4	3
L3	The CTS requires the suspension of Core Alterations when the requirements of CTS 3.5.F.1, 3.5.F.2 or 3.5.F.3 are not met. The ITS does not retain any ECCS operability requirements during Core Alterations.	N/A	3.5.F.4	2
L4	CTS requirements for actuation testing of CS and LPCI stipulate a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirements for verifying that each require CS and LPCI subsystem actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirements.	SR 3.5.2.6	Table 4.2-2 Note 7	3
L5	The flow rate specified in the CTS for the Low Pressure Injection System has been decreased from 8910 gpm to 7700 gpm, consistent with the values used in the plant specific LOCA analysis reflected in NEDC-31317P (James A. FitzPatrick Nuclear Power Plant SAFER/GESTR-LOCA Loss of Coolant Accident Analysis).	SR 3.5.2.5	4.5.F.1	3
	3.5.3, RCIC SYSTEM			
L1	The CTS allows continued operation for a maximum of 7 days after RCIC only is determined to be inoperable. The ITS allows continued operation for a maximum of 14 days under the same conditions.	3.5.3 Required Action A.2	3.5.E.1	6
L2	The CTS requires that the reactor be in the cold condition and reactor pressure be reduced to less than 150 psig within 24 hours when the ACTIONS for RCIC cannot be satisfied. The ITS extends the time allowed for the plant to reduce pressure from 24 hours to 36 hours.	3.5.3 Required Action B.2	3.5.E.2	6
L3	The CTS requirement for actuation testing of RCIC stipulates a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirement for verifying that the RCIC System actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirement.	SR 3.5.3.6	4.5.E.1.a	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires that the HPCI System be verified to be Operable daily whenever the RCIC System is inoperable. This explicit verification has been deleted.	N/A	4.5.E.2	4
L5	The CTS requires pressure to be reduced to less than 150 psig if RCIC is not restored to Operable status within the allowed time. The ITS requires reactor steam dome pressure to be reduced to ≤ 150 psig under the same condition. This change is slightly less restrictive since a reduction in reactor steam dome pressure to only 150 psig will be considered as satisfying the requirement, whereas in the CTS reactor steam dome pressure must be reduced to < 150 psig.	3.5.3 Required Action B.2	3.5.E.2	4
L6	The CTS requires that RCIC flow be demonstrated "against a system head corresponding to a reactor vessel pressure of 1195 to 150 psig." The ITS requires a demonstration of required RCIC flow "against a system head corresponding to reactor pressure." Adopting the ITS wording for the low pressure test results in testing requirements analogous to the CTS specification and current testing practices at the low end of the RCIC operability band. Adopting the ITS wording for the high end of the RCIC operability band, however, constitutes a less restrictive change.	SR 3.5.3.4, SR 3.5.3.5	4.5.E.1.d	3

CHANGE TYPE

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

1. Not used in Table or in the front matter of the SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.1, PRIMARY CONTAINMENT			
L1	The CTS does not provide any time to restore the primary containment to Operable status if it is found to be inoperable. In the ITS, 1 hour is allowed to restore primary containment to OPERABLE status prior to the commencement of a plant shutdown.	3.6.1.1 ACTION A	3.7.A.2	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.1 Required Action B.2	3.7.A.8	6
L3	The Frequency for performing a visual inspection of the accessible interior surfaces of the drywell and above the water line of the torus (suppression chamber) for evidence of deterioration is being changed from every 24 months to three times in a ten year period in the ITS. The ITS will effectively require the visual inspection to be performed prior to each Type A test and two additional times during each 10 year interval.	SR 3.6.1.1.1	4.7.A.1	3
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS			
(1) L1	The ITS includes a Note to permit entry through a closed or locked air lock door (closed due to an inoperable door in the associated air lock) for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the proposed Bases. (4)	3.6.1.2 ACTIONS Note 1	~~3.7.A.2~~ N/A	4
(1) L2	The ITS includes a Note to permit entry through a closed or locked air lock door (closed due to an inoperable door in the associated air lock) for any purpose for up to 7 days. The proposed allowance will have strict administrative controls, which are detailed in the proposed Bases.	3.6.1.2 Required Action A Note 2	~~3.7.A.2~~ N/A	4
(1) L3	A new ACTION is included in the ITS for when a primary containment air lock (is) inoperable for reasons other than one primary air lock door inoperable or a primary containment air lock interlock mechanism inoperable. The ITS will allow up to 24 hours to restore the inoperable air lock under this condition, provided the primary containment is not rendered inoperable by the air lock inoperability.	3.6.1.2 ACTION C, 3.6.1.2 ACTIONS Note 3	~~3.7.A.2~~ N/A	4, 6
L4	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.2 Required Action D.2	3.7.A.8	6

1. This allowance is not in the CTS. This is a new allowance. Thus there is NO CTS Section

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
(1) L5	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each air lock."	3.6.1.2 ACTIONS Note 2	~~3.7.A.2~~ N/A	4
	3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES			
L1	The CTS stipulates a "simulated" automatic actuation test of the PCIVs shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each PCIV actuates on an automatic isolation signal.	SR 3.6.1.3.7	4.7.D.1.a, Table 4.2-1 Note 7	3
L2	Not used.	N/A	N/A	N/A
L3	The CTS does not provide specific ACTIONS for those open penetrations with two inoperable PCIVs (except due to a leakage problem); thus the plant must be in cold shutdown within 24 hours. In the ITS, 1 hour is allowed to isolate the affected penetration flow path prior to requiring a plant shutdown.	3.6.1.3 ACTION B	3.7.D.3	5
L4	The CTS does not provide specific ACTIONS for those open penetrations that have only one PCIV and the PCIV is inoperable; thus the plant must be in cold shutdown within 24 hours. In the ITS, 72 hours is provided to isolate the penetration prior to requiring a plant shutdown. In addition, a periodic verification of the isolated penetration is required every 31 days.	3.6.1.3 ACTION C	3.7.D.3	5
L5	The CTS allows 4 hours to isolate a penetration when one PCIV in the penetration is inoperable. In the ITS, 8 hours is allowed to isolate a main steam line penetration.	3.6.1.3 Required Action A.1, second Completion Time	3.7.D.2.b	6
(1) L6	The ITS includes an additional method of isolating a penetration when a PCIV is inoperable. The ITS will allow the penetration to be isolated by use of a check valve with flow through the valve secured.	3.6.1.3 Required Action A.1	~~3.7.D.2.c~~ N/A	4
L7	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.3 Required Action F.2	3.7.D.3, 3.7.A.8	6

1. This is a new allowance that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L8	The periodic verification that a penetration is isolated (when isolated to comply with other actions) is changed from a daily recording requirement in the CTS to a monthly verification or a verification "Prior to entering MODE 2 or 3 from MODE 4, if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days, for isolation devices inside primary containment" in the ITS.	3.6.1.3 Required Action A.2	4.7.D.2	6
L9	The CTS does not provide specific ACTIONS for those MSIVs that are inoperable due to a leakage problem; thus the plant must be in cold shutdown within 24 hours. In the ITS, 8 hours are allowed to restore MSIV leakage to within limits prior to requiring a plant shutdown.	3.6.1.3 ACTION D	3.7.A.8	5
L10	The CTS does not provide specific ACTIONS for the air operated testable check valves associated with the LPCI and CS systems injection penetrations that are inoperable due to a leakage problem; thus the plant must be in cold shutdown within 24 hours. In the ITS, 72 hours are allowed to restore the leakage to within limits prior to requiring a plant shutdown.	3.6.1.3 ACTION E	3.7.A.8	5
L11	The CTS requires a verification that a penetration flow path with an inoperable PCIV is isolated. The ITS includes Notes that allow the verification to be performed administratively for isolation devices that are in high radiation areas and for isolation devices that are locked, sealed, or otherwise secured.	3.6.1.3 Required Actions A.2 and C.2 Note, SR 3.6.1.3.2 Notes 1 and 2, SR 3.6.1.3.3 Notes 1 and 2	4.7.D.2	3, 4
L12	The CTS identifies the plant specific valve numbers for the air operated testable check valves associated with the LPCI and CS systems injection penetrations. The ITS does not include these plant specific valve numbers.	~~SR 3.6.1.3.11~~ N/A	4.7.A.2.c	3
L13	The CTS requirement to demonstrate the leakage rate of the Low Pressure Coolant Injection (LPCI) System and Core Spray System injection penetration air operated testable check valves is within limits once per 24 months is changed in the ITS to be every 30 months (and the 30 month test interval may be extended to 60 months with satisfactory test performance), as part of the Type C testing required by the Primary Containment Leakage Rate Testing Program.	SR 3.6.1.3.11	4.7.D.2.c	3
	3.6.1.4, DRYWELL PRESSURE			

1. The ITS does not have this item in it. It was deleted.

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE
	3.6.1.5, DRYWELL AIR TEMPERATURE			
NONE	NONE	NONE	NONE	NONE
	3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS			
(1) L1	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each line."	3.6.1.6 ACTIONS Note	~~3.7.A.4~~ N/A	4
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.6 Required Action E.2	3.7.A.8	6
	3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS			
L1	The CTS requires that "When it is determined that one vacuum breaker is inoperable for fully closing when operability is required, the operable breakers shall be exercised immediately, and every 15 days thereafter until the inoperable valve has been returned to normal service." This requirement has not been included in the ITS.	N/A	4.7.A.5.b	3
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.7 Required Action C.2	3.7.A.8	6
L3	Not used.	N/A	N/A	N/A
L4	The Frequency of the exercising of each Suppression Chamber-to-Drywell vacuum breaker through an open-close cycle is being extended from "monthly" in the CTS to "In Accordance with the Inservice Testing (IST) Program" (i.e., 92 days) in the ITS.	SR 3.6.1.7.2	4.7.A.5.a	3

1. This is a New allowance that is Not in the CTS. Thus there is No CTS section.

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.8, MAIN STEAM LEAKAGE COLLECTION SYSTEM			
NONE	NONE	NONE	NONE	NONE
	3.6.1.9, RHR CONTAINMENT SPRAY			
L1	Not used.	N/A	N/A	N/A
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.9 Required Action C.2	3.5.B.4	6
L3	The Frequency for performance of an air test on the containment spray header and nozzles has been extended from 5 years in the CTS to 10 years in the ITS.	SR 3.6.1.9.3	4.5.B.1.f	3
L4	The CTS requires two Residual Heat Removal (RHR) pumps to be Operable in each containment spray mode subsystem. In the ITS, only one RHR pump, as indicated in the Bases, will be required to be Operable in each RHR containment spray subsystem.	LCO 3.6.1.9 (including Bases)	3.5.B.1	1
L5	No actions are provided in the CTS for when two RHR containment spray subsystems are inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION is provided to allow both RHR containment spray subsystems to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.6.1.9 ACTION B	N/A	5
	3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE			
L1	No specific actions are provided in the CTS for when the suppression pool temperature is exceeding the temperature limit during normal power operation (i.e., not due to testing); thus a plant shutdown to cold shutdown is required. In the ITS, 24 hours is allowed to restore the suppression pool temperature to ≤ 95 °F, provided the temperature is ≤ 110 °F and no testing that adds heat to the suppression pool is in progress.	3.6.2.1 Required Action A.2	3.7.A.8	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	No specific actions are provided in the CTS for when the suppression pool temperature is exceeding the temperature limit during normal power operation; thus a plant shutdown to cold shutdown is required. In the ITS, after the time allowed to restore the suppression pool temperature to within limits described in DOC L1 has expired, 12 hours are allowed to reduce power to ≤ 1% RTP is allowed (i.e., the ITS does not require a shutdown to cold shutdown).	3.6.2.1 ACTION B	3.7.A.8	5
L3	The CTS requires an external visual inspection of the suppression chamber whenever there is indication of relief valve operation with the local suppression pool temperature reaching 160°F or greater and the primary coolant system pressure greater than 200 psig. This Surveillance is not included in the ITS.	N/A	4.7.A.1	3
L4	The CTS requires monitoring suppression pool temperature when "there is indication of relief valve operation or testing which adds heat to the suppression pool." The ITS only requires increased monitoring of the suppression pool temperature during testing; the requirement to monitor when there is indication of relief valve operation is not included in the ITS unless it is associated with a specific test.	SR 3.6.2.1.1	4.7.A.1	3
L5	In the CTS, if the testing limit of 105 °F (95 °F plus the 10 °F increase allowed during testing) is exceeded, the CTS requires the reactor to be placed in the cold condition within 24 hours. In the ITS, if the suppression pool temperature exceeds 105 °F, then testing must be immediately suspended and 24 hours is then allowed to restore temperature to ≤ 95 °F prior to requiring a plant shutdown.	3.6.2.1 Required ACTIONS A.2 and C.1	3.7.A.1.c.(2), 3.7.A.8	5
	3.6.2.2, SUPPRESSION POOL WATER LEVEL			
L1	No specific actions are provided in the CTS for when the suppression pool water level is not within the limits; thus a plant shutdown to cold shutdown is required. In the ITS, 2 hours is allowed to restore the water level to within limits prior to requiring a plant shutdown.	3.6.2.2 ACTION A	3.7.A.8	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.2.2 Required Action B.2	3.7.A.8	6
	3.6.2.3, RHR SUPPRESSION POOL COOLING			
L1	Not used.	N/A	N/A	N/A

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	The CTS requires two Residual Heat Removal (RHR) pumps to be Operable in each suppression pool cooling mode subsystem. In the ITS, only one RHR pump, as indicated in the Bases, will be required to be Operable in each RHR suppression pool cooling subsystem.	LCO 3.6.2.3 (including Bases)	3.5.B.1	1
L3	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.2.3 Required Action C.2	3.5.B.4	6
L4	No actions are provided in the CTS for when two RHR suppression pool cooling subsystems are inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION is provided to allow both RHR suppression pool cooling subsystems to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.6.2.3 ACTION B	N/A	5
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE				
L1	The Frequency to monitor the drywell-to-suppression chamber differential pressure has been changed from once per 8 hours in the CTS to once per 12 hours in the ITS.	SR 3.6.2.4.1	4.7.A.7.a	3
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION				
NONE	NONE	NONE	NONE	NONE
3.6.3.2, CAD SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, SECONDARY CONTAINMENT				

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS does not provide any time to restore the secondary containment to Operable status if it is found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if the secondary containment is inoperable. In the ITS, 4 hours is allowed to restore secondary containment to OPERABLE status prior to the commencement of a plant shutdown.	3.6.4.1 ACTION A	3.7.C.2	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.4.1 Required Action B.2	3.7.C.2	6
L3	The CTS requires the Reactor Coolant System to be vented in order for secondary containment to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L4	The requirement to perform the secondary containment capability test "prior to refueling" is not included in the ITS since the normal periodic Surveillance Frequency is sufficient.	N/A	4.7.C.1.c	3
L5	CTS 3.7.C.2 requires all four conditions of CTS 3.7.C.1 to be met if secondary containment is inoperable. If secondary containment is inoperable when moving irradiated fuel while operating in MODE 1, 2, or 3, CTS requires plant shutdown and cooldown actions within 24 hours (CTS 3.7.C.1.a and 3.7.C.1.b) in addition to suspension of movement of irradiated fuel (CTS 3.7.C.1.d). In ITS, for the same set of conditions (that is, if secondary containment is inoperable when operating in MODE 1, 2, or 3 and while moving irradiated fuel) the addition of the Note to ITS 3.6.4.1 ACTION C.1 allows plant operation to continue for the 4 hour period allowed by ITS 3.6.4.1 ACTION A, prior to entering any action that requires plant shutdown and cooldown (ITS 3.6.4.1 ACTION B). Required	3.6.4.1 Required Action C.1 Note	3.7.C.2	5
	3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES			
L1	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.4.2 Required Action C.2	3.7.C.2	6
L2	The ITS includes a Note that allows penetration flow paths to be unisolated intermittently under administrative controls, if they were closed to comply with actions.	3.6.4.2 ACTIONS Note 1	N/A	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS does not provide any time to restore one inoperable secondary containment isolation valve in a penetration to Operable status if it is found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if a secondary containment isolation valve is inoperable. In the ITS, 8 hours is allowed to isolate the affected secondary containment penetration prior to the commencement of a plant shutdown.	3.6.4.2 ACTION A	3.7.C.2	5
L4	The CTS does not provide any time to restore both inoperable secondary containment isolation valves in a penetration to Operable status if they are found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if any secondary containment isolation valves are inoperable. In the ITS, 4 hours is allowed to isolate the affected secondary containment penetration prior to the commencement of a plant shutdown.	3.6.4.2 ACTION B	3.7.C.2	5
L5	The CTS requires the Reactor Coolant System to be vented in order for secondary containment isolation valves to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L6	Not used.	N/A	N/A	N/A
1 L7	The CTS/RETS stipulates a "simulated" automatic actuation test of the SCIVs shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each SCIV actuates on an automatic isolation signal. ~~consistent with CTS interpretation and practice.~~	SR 3.6.4.2.3	Table 4.2-1 Note 7, RETS Table 3.10-2 Note 7	3
L8	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path."	3.6.4.2 ACTIONS Note 2	N/A	4
2 L9	In the CTS, if secondary containment is inoperable (due to SCIV inoperability) during movement of irradiated fuel, or during CORE ALTERATIONS, while operating in MODE 1, 2, or 3, CTS requires plant shutdown and cooldown actions within 24 hours (CTS 3.7.C.1.a and 3.7.C.1.b) in addition to suspension of CORE ALTERATIONS and suspension of movement of irradiated fuel (CTS 3.7.C.1.c and CTS 3.7.C.1.d respectively). Required In ITS the addition of the Note to ITS 3.6.4.2 ACTION D.1, precludes entry into ITS 3.0.3 (and thus the plant shutdown Actions of ITS 3.0.3 are not available) while ITS 3.6.4.2 ACTION A.1 or ACTION B.1, allow plant operation to continue for 8 hours or 4 hours, respectively, prior to entering any action that requires plant shutdown and cooldown (ITS 3.6.4.2 ACTION C).	3.6.4.2 Required Actions D.1 Note	~~3.7.C~~ N/A	5
	3.6.4.3, STANDBY GAS TREATMENT SYSTEM			

1. This change is not consistent with current interpretation and practice - it is a less restrictive change
2. This is a new allowance that is not in CTS. Thus there is NO CTS section

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
(1) L1	The CTS prohibits irradiated fuel handling operations and operations that could reduce the shutdown margin (i.e., CORE ALTERATIONS) if the inoperable SGT subsystem is not restored to Operable status within the allowed completion time. In the ITS, in lieu of suspending these activities, the option exists to place the OPERABLE SGT subsystem in operation.	3.6.4.3 Required Action C.1	~~3.7.B.3~~ N/A	5
L2	Not used.	N/A	N/A	N/A
L3	The CTS requires the Reactor Coolant System to be vented in order for the SGT system to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L4	The CTS/RETS stipulates a "simulated" automatic actuation test of the SGT subsystems shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each SGT subsystem actuates on an automatic initiation signal.	SR 3.6.4.3.3	Table 4.2-1 Note 7, 4.7.B.1.d, RETS Table 3.10-2 Note f	3
L5	Not used.	N/A	N/A	N/A
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM				
NONE	NONE	NONE	NONE	NONE

1. This is a new change that is not in the CTS. Thus there is no CTS Section

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

9. Elimination of CTS Reporting Requirement

(1) ~~10. Relaxation of Surveillance Frequency from 18 Months to 24 Months~~

1. This is not in the Table nor described in the front matter of the SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.1, RHRSW SYSTEM			
(1) L1	The CTS allows operation to continue for 30 days with one RHR service water pump inoperable provided that during such 30 days all remaining components of the containment cooling mode subsystems are operable. This means that all four RHR pumps are OPERABLE as well as the remaining RHR service water pumps. The ITS does not include this requirement, since other LCOs and ACTIONS contain the proper actions to take if other components of the containment cooling mode become inoperable.	~~3.7.1, 3.6.1.9 ACTION B, 3.6.2.3 ACTION B, 3.0.6~~ N/A	3.5.B.2, 3.5.B.3	4
L2	The CTS does not provide specific ACTIONS for two Residual Heat Removal (RHR) service water subsystems inoperable for reasons other than one inoperable pump in each subsystem. Thus, a shutdown is required by CTS 3.0.C and the plant must be placed in a cold condition within 24 hours. In the ITS, when both RHRSW subsystems are inoperable for reasons other than one pump in each subsystem inoperable, 8 hours is allowed to restore one RHR service water subsystem to OPERABLE status.	3.7.1 ACTION D	3.0.C	6
L3	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for RHRSW inoperabilities cannot be satisfied. The ITS extends the time allowed for the plant to be in MODE 4 from 24 hours to 36 hours.	3.7.1 Required Action E.2	3.5.B.4	6
L4	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHRSW component is inoperable. These explicit verifications have all been deleted.	N/A	4.5.B.2, 4.5.B.3	4
L5	The CTS requires that each RHRSW subsystem "valve (manual, power operated, or automatic) in the flowpath that is not locked, sealed or otherwise secured in position, is in the correct position" once per 31 days. The ITS requires that "each RHRSW 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 or can be aligned to the correct position" every 31 days. The proposed change permits the RHRSW subsystem to be considered OPERABLE as long as the valves can be manually realigned to their correct position.	SR 3.7.1.1	4.5.B.1.e	3
	3.7.2, ESW SYSTEM and UHS			
L1	The CTS requirement for actuation testing of the ESW System stipulates a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirement for verifying that the ESW System actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirement.	SR 3.7.2.7	4.11.D.1.a	3

1. This requirement is deleted. It is not in any ITS Sections.

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	The CTS requires the Emergency Diesel Generator System emergency loads be verified Operable immediately and at least daily thereafter if the ESW System is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	4
L3	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for ESW and Ultimate heat sink inoperabilities cannot be satisfied. The ITS extends the time allowed for the plant to be in MODE 4 from 24 hours to 36 hours.	3.7.2 Required Action C.2	3.11.D.3, 3.0.C	6
L4	The CTS requires the Emergency Diesel Generator (EDG) System be demonstrated Operable immediately and at least daily thereafter if the ESW System is inoperable. These explicit verifications have all been deleted. The ITS will only require a single verification (through the EDG Technical Specification ACTIONS) of EDG Operability, either through an evaluation or demonstration, within 24 hours.	3.8.1 Required Actions B.3.1 and B.3.2	3.11.D.2	4
(1) L5	The CTS requirement to monitor individual heater current whenever large deviations are identified in the feeder checks has been deleted.	~~SR 3.7.2.4~~ ~~SR 3.7.2.5~~ N/A	4.11.E.2	3
3.7.3, CREVAS SYSTEM				
L1	The CTS requires the main control room emergency ventilation air supply system capacity to be tested every 18 months to assure that it is within 10% of the design value of 1000 cfm. The ITS will allow the test to be performed on a STAGGERED TEST BASIS, such that each subsystem is tested every 36 months instead of the current 18 months.	SR 3.7.3.3	4.11.A.5	3
3.7.4, CONTROL ROOM AC SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS				

1. This requirement is deleted. It is not in any ITS SR

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS does not provide any specific actions when the LCO is not met. Therefore, when the LCO is not met, CTS 3.0.C must be entered and the reactor placed in COLD SHUTDOWN within 24 hours. The requirement to shutdown is not maintained in the ITS (see DOC M1 for new ACTION). In addition, the ITS includes a Note that states LCO 3.0.3 is not applicable to the new ACTION. This Note is necessary because defaulting to ITS LCO 3.0.3 would require the reactor to be shutdown but would not require suspension of movement of irradiated fuel which would preclude a refueling accident from occurring over the spent fuel pool.	3.7.7 ACTION A Note	3.0.C	4
CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES				
NONE	NONE	NONE	NONE	NONE
CTS 3/4.11.C, BATTERY ROOM VENTILATION				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

(1) 1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.1, AC SOURCES - OPERATING			
L1	The CTS does not provide a specific Action for the condition of one inoperable offsite circuit and one inoperable EDG subsystem. Therefore, if this Condition existed the plant would be required to enter LCO 3.0.C and place the plant in cold shutdown in 24 hours. The ITS includes a new ACTION that provides 12 hours to restore either the inoperable EDG or the inoperable offsite circuit in this condition prior to requiring a plant shutdown.	3.8.1 ACTION D	N/A	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4.	3.8.1 Required Action F.2	3.9.B.1, 3.9.B.2, 3.9.B.3, 3.9.B.4, 3.0.E	6
L3	The CTS requires that each EDG subsystem be force paralleled and loaded to 5200 kW, and load sharing capability checked. The ITS will require each EDG subsystem be paralleled with normal, reserve, or backfeed power and each EDG be loaded and operated at a load ≥ 2340 kW and ≤ 2600 kW. Thus the change essentially provides a load range of 2340 kW to 2600 kW (and does not use the term "load sharing"), whereas the CTS required a specific limit of 2600 kW per EDG.	SR 3.8.1.3	4.9.B.1	3
L4	The CTS stipulates a simulated automatic actuation test to demonstrate that the pair of diesel generators will start, accelerate, force parallel, and accept the emergency loads in the prescribed sequence. The ITS allows for use of an "actual" to the automatic initiation signal, in addition to the simulated automatic actuation signal, for verifying that each EDG starts on an automatic initiation signal.	SR 3.8.1.9, SR 3.8.1.10, SR 3.9.1.12	4.9.B.4	3
L5	The CTS provides a Completion Time of 8 hours when an EDG subsystem is inoperable to demonstrate, by manual start and force paralleling, the availability of the OPERABLE EDG subsystem or determine that the inoperability is due to preplanned maintenance or testing, an inoperable support system with no potential common mode failure, or an independently testable component with no potential common mode failure. In the ITS, the Completion Time has been extended to 24 hours to verify the remaining EDG is not inoperable due to a common cause failure.	3.8.1 Required Actions B.3.1 and B.3.2	4.9.B.5	6

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L6	The CTS has an action that allows for operation to continue for 60 days with one inoperable fuel oil transfer pump associated with a Diesel Generator subsystem provided the remaining fuel oil transfer pumps are demonstrated OPERABLE immediately and weekly thereafter. This action implies that all EDG subsystem fuel oil transfer pumps are required to be Operable. Each individual diesel generator is provided with an independent fuel oil system consisting of a main fuel oil storage tank, a day tank and two full-capacity motor-driven pumps which are designed to transfer fuel oil from the storage tank to the associated day tank automatically. Therefore, in the ITS, only one pump is required to be OPERABLE for each EDG, as stated in the Bases. Therefore, this specific CTS action has been deleted.	N/A	3.9.C.2.a	1
L7	CTS 3.0.E requires the plant to be in cold shutdown within 24 hours when a redundant feature is inoperable and the reserve or onsite power source of a system, subsystem, train, component or device is inoperable. The ITS will allow: a) 24 hours from discovery of no offsite power to one division concurrent with inoperability of redundant required feature(s) to declare required feature(s) with no offsite power available inoperable when the required feature(s) are inoperable; b) 4 hours from discovery of one inoperable EDG subsystem concurrent with inoperability of redundant required feature(s) to declare the required features supported by the inoperable EDG subsystem inoperable when the redundant required feature(s) are inoperable; and c) 12 hours from discovery of two offsite circuits inoperable concurrent with inoperability of redundant required feature(s) to declare required feature(s) inoperable when the redundant required feature(s) are inoperable. The ITS provides a restoration time whereas the CTS did not allow any restoration time, and the ITS allows the affected features to be declared inoperable and to take the actions of the individual Specifications in lieu of the automatic shutdown required by the CTS.	3.8.1 Required Actions A.2, B.2 and C.1	3.0.E	5
L8	The ITS includes a Note that allows gradual loading of the EDG as recommended by the manufacturer during the monthly load test.	SR 3.8.1.3 Note 1	N/A	3
L9	The ITS includes a Note that allows momentary load transients to be outside the load range and not invalidate performance of the monthly load test.	SR 3.8.1.3 Note 2	N/A	3
3.8.2, AC SOURCES - SHUTDOWN				

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the pilot cell voltage, specific gravity, overall voltage, and temperature to be measured immediately and daily thereafter for the Operable battery and requires the availability of the unaffected Emergency Diesel Generator System to be demonstrated, when one 125 VDC battery is inoperable. Similarly, the CTS requires the performance of additional Surveillances on the Operable LPCI MOV independent power supply subsystem if one LPCI MOV independent power supply subsystem is inoperable. These verifications are not required in the ITS.	N/A	3.9.E.2.b, 3.9.E.2.c, 3.9.F.2.b	3
L2	Not used.	N/A	N/A	N/A
L3	The CTS allows power operation to continue with an inoperable 125 VDC battery if the distribution system associated with the Operable 125 VDC electrical power subsystem battery is Operable. Similarly, the CTS allows power operation to continue with an inoperable LPCI independent power supply if the inverter and distribution system associated with the Operable LPCI independent power supply is Operable. The ITS does not retain these explicit requirements, since other Technical Specifications adequately control the Operability of the distribution subsystems.	N/A	3.9.E.2.a, 3.9.F.2.a	4
L4	No actions are provided in the CTS for when a 125 VDC battery charger is inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION (encompassed by the inoperable 125 VDC source ACTION) is provided to allow one charger to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.8.4 ACTION A	N/A	5
L5	The CTS requirement to open the battery charger output breakers once per month and observe performance for proper operation has been deleted since the 125 VDC battery charger output breaker is not required to open during any accident sequence.	N/A	4.9.E.7	3
L6	The CTS requires that if one independent power supply becomes inoperable, the inoperable independent power supply must be isolated from its associated LPCI MOV bus, and this bus be manually switched to its alternate power source. If this cannot be met, a plant shutdown to cold shutdown is required. This requirement is not maintained in the ITS since the CTS allows a 7 day Completion Time for any other LPCI subsystem inoperability with no other compensatory actions.	N/A	4.9.F.2.c	4
L7	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4. In addition, the CTS requires the plant to be in cold shutdown within 24 hours if both LPCI MOV Independent Power Supplies are inoperable. In the ITS, the associated LPCI subsystems must be declared inoperable, and once declared inoperable, 36 hours is provided to place the plant in Mode 4.	3.8.4 Required Actions B.2 and C.1	3.9.E, 3.9.F.3, 3.9.F.2	6

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L8	The CTS requirement to perform CTS 4.9.E.3 and 4.9.E.4 during shutdown has been included in the ITS. However, the ITS includes an allowance that portions of the Surveillance can be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced and that credit for unplanned events can be taken to satisfy this SR.	SR 3.8.4.3 ~~and~~ SR 3.8.4.4	4.9.E.3, 4.9.E.4	3
3.8.5, DC SOURCES - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.8.6, BATTERY CELL PARAMETERS				
L1	Not used.	N/A	N/A	N/A
L2	The CTS requirement to measure electrolyte temperature of each pilot cell every 7 days is not being included in the ITS.	N/A	4.9.E.1, 4.9.F.1	3
L3	The CTS requirement to measure the temperature of every fifth cell every 92 days, is being changed. The ITS requires the average electrolyte temperature of representative cells (10% of the total) be verified within limits every 92 days. This change reduces the number of cells tested from 12 to 6 based on a total of 60 cells in the 125 VDC batteries and from 38 to 19 based on a total of 186 cells in the 419 VDC LPCI MOV independent power supply batteries.	SR 3.8.6.3	4.9.E.2.c, 4.9.F.2.c	3
3.8.7, DISTRIBUTION SYSTEMS - OPERATING				
L1	No actions are provided in the CTS for when an AC or 125 VDC distribution bus is inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, new ACTIONS are provided to: a) allow AC distribution buses to be inoperable for up to 8 hours, provided a loss of function does not occur, prior to requiring a plant shutdown; and b) allow one 125 VDC distribution bus to be inoperable for up to 8 hours prior to requiring a plant shutdown. In addition, a maximum time the LCO cannot be met is also provided (16 hours).	3.8.7 ACTIONS A and B	N/A	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4.	3.8.7 Required Action C.2	3.0.C	6

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

1. Not used in Table and not described in the front matter of the SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.1, REFUELING EQUIPMENT INTERLOCKS			
L1	The CTS requires a functional test required following any repair work associated with the interlock. This specific post maintenance testing is not retained in the ITS.	N/A	4.10.A.1	3
L2	The CTS Applicability for the refueling interlocks is "during Core Alterations". The ITS Applicability is "during in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position". The ITS Applicability requires that the refueling equipment interlocks be Operable only during those situations when the interlocks are assumed to operate to prevent inadvertent criticality, i.e., in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position. In addition, a new default ACTION has been added for the condition when one or more required refueling equipment interlocks are inoperable. Two options are provided; a) the immediate suspension of in-vessel fuel movement with equipment associated with the inoperable interlocks, or b) the immediate insertion of a control rod withdrawal block and the immediate verification that all control rods are fully inserted.	3.9.1 Applicability, 3.9.1 Required Actions A.1 and A.2	3.10.A.1	2, 4
L3	The CTS requires the refueling interlocks be functionally tested prior to any fuel handling with the head off and at a weekly interval thereafter. The ITS does not include the "prior to" frequency since it is redundant to the SR 3.0.1 requirements.	N/A	4.10.A.1	3
	3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK			
L1	The CTS Applicability for the one-rod-out interlock is "during Core Alterations". The ITS Applicability is "MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn." The ITS Applicability requires that the "one-rod-out interlock" be operable only during those situations when the interlock is assumed to operate to prevent inadvertent criticality, i.e., the mode switch in refuel and any control rod withdrawn.	3.9.2 Applicability	3.10.A.1	2
L2	The CTS requires the one-rod-out interlock be functionally tested prior to any fuel handling with the head off and at a weekly interval thereafter. The ITS includes a Note that allows deferring the performance of this functional test "until one hour after any control rod is withdrawn." This allowance is necessary because the test is performed by entering the applicable condition (i.e., a control rod must be withdrawn from its full-in position) and attempting to withdraw a second control rod.	SR 3.9.2.2 Note	4.10.A.1	3
L3	The CTS requires a functional test required following any repair work associated with the interlock. This specific post maintenance testing is not retained in the ITS.	N/A	4.10.A.1	3

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE

CHANGE TYPE

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

1. Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION			
L1	The CTS requires the inservice leak and hydrostatic testing operations to be suspended immediately when the requirements of CTS 3.12.A are not met. The ITS includes an alternative action to allow entry into the applicable Conditions of the affected LCO if any requirement of ITS LCO 3.10.1 is not met. In addition, a Note has been added to clarify that if an affected Specifications ACTIONS state to be in MODE 4, this includes reducing average coolant temperature to ≤ 212°F. Along with this change a NOTE has been added to the ACTIONS Table which allows separate Condition entry for each requirement of the LCO. In conjunction with proposed Specification 1.3 - "Completion Times," the Note ("Separate condition entry ...") and the Conditions of ITS 3.10.1 provide more explicit direction for the use of the ITS.	3.10.1 ACTIONS Note, 3.10.1 Required Action A.1, including Note	3.12.A.6	4, 5
L2	The CTS requires the plant to immediately reduce coolant temperature to less than 212°F whenever any requirement of CTS 3.12.A is not met. The ITS requires the reduction in reactor coolant temperature to ≤ 212°F. The Applicability of this Specification is when reactor coolant temperature is > 212°F, therefore, reducing the coolant temperature as specified in the ITS places the plant outside the Applicability of this Specification.	3.10.1 Required Action A.2.2	3.12.A.6	5
	3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING			
L1	ITS 3.10.2 is added to allow reactor mode switch interlock testing to be conducted by placing the reactor mode switch in run, startup/hot standby, or refuel as applicable, while in MODES 3, 4, or 5 and not consider the plant to be in MODE 1 or 2, as applicable. This testing can proceed only if there are no Core Alterations in progress, and if all control rods remain fully inserted in core cells containing one or more fuel assemblies. When these two conditions are met, the situation is equivalent to maintaining the reactor mode switch in shutdown. Control rods are not required to be inserted in empty core cells (i.e., those containing no fuel) because, with one or more core cells in this configuration, the Shutdown Margin is actually greater than when all control rods and all fuel assemblies are inserted.	3.10.2	N/A	1
	3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN			

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the reactor mode switch to be locked in the refuel position and all refueling interlocks operable except for those necessary to perform the demonstration and maintenance described in CTS 4.10.D.1 when two control rods are withdrawn to perform maintenance. The ITS will allow the requirements of LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.9.2, "Refuel Position One-Rod-Out Interlock"; and LCO 3.9.4, "Control Rod Position Indication" be suspended in MODE 5 to allow the removal of a single CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies, provided the following requirements are met: 1) all other control rods are fully inserted (as modified by DOC M1); 2) all other control rods in a five by five array centered on the withdrawn control rod are disarmed (as modified by DOC M2) ~~which time~~ LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 5 requirements, ~~may be changed~~ to allow the single control rod withdrawn to be assumed to be the highest worth control rod (as modified by DOC L2); 3) a control rod withdrawal block is inserted; and 4) no other CORE ALTERATIONS are in progress (as modified by DOC A2). This ITS LCO will not require the Operability of any refueling interlock and will not require the mode switch to be locked in the refuel position. In addition, since the requirements of ITS LCOs 3.9.1 and 3.9.2 may be suspended during the application of this Special Operations LCO, the associated Surveillances of these LCOs are not applicable; therefore, the CTS requirement to perform the Surveillance Requirements of CTS 4.10.A.1 have also been deleted.	LCO 3.10.5	3.10.D.1.a, 4.10.D.1.a	1, 3
L2	The CTS requires the performance of a shutdown margin (SDM) demonstration and that adequate margin is maintained during the maintenance with the analytically determined strongest worth operable control rod fully withdrawn. This demonstration shall be performed after CTS 3.10.D.1 has been satisfied, but prior to the withdrawal of the control rods for maintenance. The CTS also allows up to two control rods with fuel assemblies loaded into the associated core cells to be withdrawn. Therefore, adequate SDM should be maintained throughout the maintenance work with these two rods and the analytically determined strongest worth operable control rod withdrawn. The SDM demonstration is currently required to be performed prior to performing any maintenance. The ITS requires SR 3.1.1.1, the SDM verification, to be performed in accordance with its associated surveillance frequency. The ITS allows withdrawal of only one control rod from core cells containing fuel (as modified by DOC M1). Withdrawal/removal of multiple control rods is only allowed in accordance with ITS 3.10.6, and then, only if all four fuel assemblies have been removed from the core cells associated with each control rod or control rod drive being removed. ITS SR 3.1.1.1 requires SDM to be verified to be within limits prior to each in-vessel fuel movement during a fuel loading sequence and once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement. In addition, the ITS 3.10.5.~~b~~ allows the SDM verification to be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod. This change is less restrictive in two ways. SDM can be verified in accordance with the Frequency of SR 3.1.1.1 instead of demonstrated prior to maintenance and the verification can be met by allowing the single control rod to be withdrawn to be assumed to be the highest worth control rod.	LCO 3.10.5.~~b~~ c, SR 3.10.5.4	3.10.D.1.b, 4.10.D.1.b	1, 3

associated with a control rod withdrawn

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The ITS includes an allowance to suspend the requirements for automatic scram capability during control rod and control rod drive maintenance. The ITS explicitly states that the requirements of LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"; LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring"; and LCO 3.9.5, "Control Rod OPERABILITY" may be suspended in MODE 5 to allow the ~~withdrawal~~ removal of a single control rod ~~and subsequent removal of the associated CRD~~ from a core cell containing one or more fuel assemblies provided: 1) all other control rods are fully inserted (as modified by DOC M1); ~~and~~ 2) all other control rods in a five by five array centered on the withdrawn control rod are disarmed (as modified by DOC M2) ~~at which time~~ LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 5 requirements, may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod (as modified by DOC L2); 3) a control rod withdrawal block is inserted and and 4) no other CORE ALTERATIONS are in progress.	LCO 3.10.5 ~~including parts a and b~~	N/A	1
	3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING			
L1	During the removal or withdrawal of multiple control rods during refueling, the CTS requires the reactor mode switch to be locked in the Refuel position and the refueling interlocks associated with all control cells containing fuel are Operable. In addition, the CTS requires the refueling interlocks to be Operable for any control cell which contains fuel during spiral off-load or on-load. These requirements are not included in the ITS. ITS only requires that the reactor be in MODE 5 (mode switch in either shutdown or refuel) while the full-in position signal is defeated for multiple control rods that are withdrawn or removed.	LCO 3.10.6	3.10.A.5.a, 3.10.A.5.c, 3.10.A.6.a, 3.10.A.7.d	1
	3.10.7, CONTROL ROD TESTING - OPERATING			
L1	ITS 3.10.7 has been added to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing, provided the banked position withdrawal sequence (BPWS) requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or reactor engineer. These two requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA). An appropriate ACTION and Surveillance Requirement have also been added.	3.10.7	N/A	1

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.10.8, SHUTDOWN MARGIN TEST - REFUELING			
L1	The allowances in CTS 3.6.E.3 (S/RVs) to allow the equipment to be inoperable during low power physics tests provided that reactor coolant temperature is ≤ 212°F and the reactor vessel is vented (see M2) or the reactor vessel head is removed has been changed to MODE 5 with the reactor mode switch in startup/hot standby position (ITS 3.10.8 Applicability). In addition, the allowances in CTS 3.5.B.5 to allow component(s) of the Containment Cooling Mode of the RHR System to be inoperable during low power physics tests provided that reactor coolant temperature is ≤ 212°F has been changed in a similar manner. Similar changes have been made to Specifications associated with the primary containment (CTS 3.7.A.2), reactor building-to-suppression chamber vacuum breakers (CTS 3.7.A.4), suppression chamber-to-drywell vacuum breakers (CTS 3.7.A.5), primary containment isolation valves (CTS 3.7.D.1), and primary containment isolation functions (CTS 3.2.A and Table 3.2-1 Note 1). In these Specifications, explicit reference that the test must be performed at atmospheric pressure and at power levels not to exceed 5 MWt has been deleted. These changes are less restrictive in two ways: a) the first change deletes the explicit requirement to maintain reactor coolant temperature ≤ 212°F; and b) the second change involves a change in the definition made to the definition of the refuel mode.	3.10.8 Applicability	3.6.E.3, 3.5.B.5, 3.7.A.2, 3.7.A.4, 3.7.A.5, 3.7.D.1, 3.2.A, Table 3.2-1 Note 1	2
L2	The CTS requires equipment to be Operable during startup. There is no explicit definition of startup in the CTS 1.0, however, there is a definition for startup/hot standby. This definition has been modified as MODE 2 in the ITS as discussed in the Discussion of Changes for ITS Chapter 1.0. However, in the CTS, whenever the mode switch is placed in the startup/hot standby position all Technical Specification equipment required during startup must be Operable. ITS 3.10.8 allows the mode switch to be placed in startup/hot standby while the plant can still be considered to be in MODE 5 to allow SDM testing (which requires more than one control rod to be withdrawn), provided certain MODE 2 requirements are met. This change is less restrictive since certain CTS requirements will not be required to be operable to perform this Special Operations LCO. ITS 3.10.8 will additionally require the following requirements to be met: (a) LCO 3.3.1.1, "Reactor Protection System Instrumentation", MODE 2 requirements for Functions 2.a and 2.d of Table 3.3.1.1-1 (as modified by DOC A4); (b) LCO 3.3.2.1, "Control Rod Block Instrumentation", MODE 2 requirements for Function 2 of Table 3.3.2.1-1, with the Banked Position Withdrawal Sequence requirements of SR 3.3.2.1.8 changed to require the control rod sequence to conform to the SDM test sequence, or conformance to the approved control rod sequence for the SDM test is verified by a second licensed operator or a reactor engineer; (c) each withdrawn control rod shall be coupled to the associated CRD; (d) all control rod withdrawals during out of sequence control rod moves shall be made in notch out mode; (e) no other CORE ALTERATIONS are in progress; and (f) CRD charging water header pressure ≥ 940 psig. Also, appropriate ACTIONS and Surveillance Requirements have been added.	3.10.8	3.5.A, 3.5.J, 3.6.B, 3.6.G, 3.3.B.3, 3.3.A	1

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE

CHANGE TYPE

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

1, Not used in Table or described in front matter of SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The ITS includes an allowance for a limited number of lead test assemblies that have not completed representative testing to be placed in non-limiting core regions. This allowance provides recognition of a specific kind of special test with lead test assemblies that may be performed.	4.2.1	N/A	1
L2	The CTS requires that each fuel assembly consist of Zircaloy clad fuel rods. The ITS also allows the use of either Zircaloy or ZIRLO clad fuel rods. The allowance to use either Zircaloy or ZIRLO clad fuel rods has been generically approved by the NRC. In addition, prior to use of ZIRLO fuel clad, the ITS requires that JAFNPP analyze the fuel design using NRC approved codes and methods and also ensure that the fuel design complies with all safety design bases.	4.2.1	5.2.1	1

CHANGE TYPE

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

(1) 1. Not used in Table or described in front matter of the SER

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	5.1, RESPONSIBILITY			
NONE	NONE	NONE	NONE	NONE
	5.2, ORGANIZATION			
L1	Not used.	N/A	N/A	N/A
	5.3, PLANT STAFF QUALIFICATIONS			
NONE	NONE	NONE	NONE	NONE
	5.4, PROCEDURES			
NONE	NONE	NONE	NONE	NONE
	5.5, PROGRAMS AND MANUALS			
L1	The CTS requirement that certain SGT System filter tests be performed at a Frequency of "at least once during each scheduled secondary containment leak rate test," is not retained in the ITS.	N/A	4.7.B.1.b	3
L2	The CTS CREVAS filter bank pressure drop tests, HEPA filter in-place DOP tests, and the charcoal adsorber in-place bypass leakage tests and the SGT System HEPA filter in-place DOP tests and the charcoal adsorber in-place bypass leakage tests have been extended from 6 months to 24 months.	5.5.8	4.7.B.1.b, 4.11.A.1	3
L3	The CTS requires that the SGT pressure drop test be performed at a flowrate of 6,000 scfm. The ITS requires that this test be performed at a flowrate of 5400 to 6600 scfm.	5.5.8.d	4.7.B.1.a(1)	3
L4	The ITS provides an allowance for the application of SR 3.0.3 to the IST Program requirements. This change, which applies SR 3.0.3 to the existing requirements, allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.7	N/A	4

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	The ITS includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to the Primary Coolant Sources Outside Containment Program. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.2	N/A	3, 4
L6	The ITS includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to the Storage Tank Radioactivity Monitoring Program. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.9	N/A	3, 4
L7	The CTS requirement to perform a pressure drop test across each filter in the Main Control Room Ventilation system is being deleted.	N/A	4.11.A.1.a	3
	5.6, REPORTING REQUIREMENTS			
L1	The CTS requires that, "at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions." The ITS changes the word "shall" to "should."	5.6.1	6.9.A.2.a	1
L2	The RETS requires that the Annual Radiological Environmental Operating Report be submitted prior to May 1 of each year. The ITS requires this report to be submitted by May 15 of each year.	5.6.2	RETS 7.3.d	1
L3	The RETS requires that the Radioactive Effluent Release Report be submitted on a semiannual basis. The ITS requires that this report be submitted in accordance with 10 CFR 50.36a, on an annual basis.	5.6.3	RETS 7.3.c	1
(1) L4	Insert L4	N/A	6.9.A.2.b	9
	5.7, HIGH RADIATION AREA			
L1	The CTS, which provides high radiation area access control alternatives pursuant to 10 CFR 20.203(c)(2) (revised 10 CFR 20.1601(c)), has been significantly revised as a result of the changes to 10 CFR 20, the guidance provided in Regulatory Guide 8.38 (Control of Access to High and Very High Radiation Areas in Nuclear Power Plants), and current industry technology in controlling high radiation areas. The changes incorporated in ITS 5.7 (which are consistent with TSTF-258, Revision 4) include: a) a capping dose rate to differentiate a high radiation area from a very high radiation area, b) additional requirements for groups entering high radiation areas, and c) clarification of the need for control of workers in high radiation areas.	5.7	6.11(A)	1

1. Revision I Change

INSERT L4

The CTS requires an annual report of safety/relief valve (S/RV) failures and challenges to be submitted prior to March 1 of each year. This specific requirement has been deleted. The NRC has stated in approving TSTF-258, Revision 4 that this specific report is not necessary. This is an after-the-fact report and there is no requirement for the NRC to approve the report. Completion and submittal of the report is clearly not necessary to ensure safe operation of the plant. Other Technical Specifications provide adequate actions if an S/RV fails and is inoperable.

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES				
NONE	NONE	NONE	NONE	NONE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM				
NONE	NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM				
NONE	NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE – PROCESS CONTROL PROGRAM				
NONE	NONE	NONE	NONE	NONE
	TOTAL DOSE –			
RETS 5.0, TOTAL DOSE FROM URANIUM FUEL CYCLES				
NONE	NONE	NONE	NONE	NONE
RETS 6.1, MONITORING PROGRAM				
NONE	NONE	NONE	NONE	NONE

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
RETS 6.2, LAND USE CENSUS PROGRAM				
NONE	NONE	NONE	NONE	NONE
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

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

1. Not used in Table or described in the front matter of the SER

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires the unit be placed in COLD SHUTDOWN (MODE 4) within 24 hours if the LCO or action requirements cannot be satisfied because of circumstances in excess of those addressed in the Specifications. The ITS requires that the plant take action within 1 hour to initiate the shutdown, be in MODE 2 in 8 hours, be in MODE 3 in 13 hours, and be in MODE 4 in 37 hours. Since this change requires the plant to take action within 1 hour and to be at interim conditions, MODE 2 in 8 hours and MODE 3 in 13 hours, this portion of the change is more restrictive.	LCO 3.0.3	3.0.C
M2	The CTS does not address Frequencies specified as once. The ITS includes the phrase "For Frequencies specified as "once," the above interval extension does not apply." This is because the interval extension concept is based on scheduling flexibility for repetitive performance and these Surveillances are not repetitive in nature and essentially have no interval as measured from the previous performance. This change precludes the ability to extend these performances.	SR 3.0.2	4.0.B

1. Revision I change

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
M1	The CTS requires inoperable control rods to be positioned so that CTS 3.3.A.1 (ITS LCO 3.1.1) is met. No specific time limit is provided. If SDM is not met while the plant is in MODE 1 or 2, the ITS Actions will require the SDM to be restored in 6 hours or be in MODE 3 in the following 12 hours. If SDM is not met in MODE 4 or 5, the ITS Actions require action to be initiated immediately to insert all insertable control rods (in the core cells containing fuel if in MODE 5), to immediately suspend CORE ALTERATIONS (if applicable), and to initiate actions within 1 hour to restore secondary containment, SGT System and the Secondary Containment Isolation Valves (SCIVs) to Operable status.	3.1.1 ACTIONS A, B, C, D, and E	3.3.A.2.e
M2	The CTS requires that SDM be verified following a refueling outage. The ITS requires SDM to be verified once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement and prior to each in vessel fuel movement during the fuel loading sequence. Therefore, a finite time (4 hours after criticality) is now provided to verify SDM following a refueling outage. In addition, a new Surveillance Frequency for SDM verification has been added to clarify the requirements necessary for assuring SDM during the refueling process.	SR 3.1.1.1	4.3.A.1
	3.1.2, REACTIVITY ANOMALIES		
M1	The CTS Applicability has been expanded from during "power operation" to "MODES 1 and 2."	3.1.2	3.3.D
M2	The CTS requirement that the plant be placed in cold shutdown within 24 hours if the Reactivity Anomaly requirements are not met, is being deleted (see DOC L2). The ITS will require the plant to be in MODE 3 (i.e., outside the Applicability requirements) within 12 hours if the Required Action and associated Completion Time of Condition A are not met.	3.1.2 Required Action B.1	3.3.E
M3	The CTS requires a comparison of the critical rod configurations to the expected configuration during startup following refuel outages. ITS SR 3.1.2.1 requires a verification that the core reactivity difference between the measured rod density and the predicted rod density is within ± 1% Δk/k once within 24 hours after reaching equilibrium conditions following startup after fuel movement within the reactor pressure vessel or control rod replacement (1st frequency). This change is more restrictive since the proposed surveillance is explicit on the Frequency (24 hours after reaching equilibrium conditions) and provides an additional condition for performing the surveillance (control rod replacement).	SR 3.1.2.1	4.3.D
	3.1.3, CONTROL ROD OPERABILITY		

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires an inoperable control rod or an uncoupled control rod to be disarmed, but does not provide a finite time to complete the action, nor does it require the control rods to be inserted prior to disarming. In addition, the CTS allows a control rod inoperable due to a scram time greater than 7 seconds to not be disarmed, provided it can be inserted. The ITS requires that if a rod is considered inoperable for any reason (including excessive scram time), it must be fully inserted within 3 hours (unless it is stuck) and disarmed within 4 hours.	3.1.3 Required Actions C.1 and C.2	3.3.A.2.b, 3.3.A.2.c, 3.3.B.1
M2	The CTS allows the plant to restart and continue operation with multiple stuck control rods if: 1) collet housing failure is eliminated as a potential cause; 2) sufficient control rods remain operable to make the core subcritical with the most reactive rod fully withdrawn (i.e., SDM is maintained); and 3) the stuck rod is disarmed. The ITS will require Hot Shutdown (MODE 3) within 12 hours when more than one control rod is stuck but not fully inserted, regardless of the reasons for the stuck control rods.	3.1.3 Required Action B.1	3.3.A.2.a
M3	The CTS requires that control rods be "exercised one notch," which could be met by withdrawing the control rod one notch. The ITS requires control rods to be "inserted" at least one notch, in lieu of the existing requirement for "exercising."	SR 3.1.3.2, SR 3.1.3.3	4.3.A.2.a
M4	The control rod exercise Surveillance initial condition "when operating above 30 percent power" is changed to "THERMAL POWER is greater than the LPSP of the RWM." Since the LPSP is set well below the 30% RTP level (the RWM must be operable equal to and less than 10% RTP), this change is more restrictive than present requirements but does not impose any safety concerns since at power levels above the LPSP notch insertions will not impact the requirements of the Banked Position Withdrawal Sequence.	3.1.3 Required Action A.3 Completion Time, SR 3.1.3.2 and SR 3.1.3.3 Notes	4.3.A.2.a
M5	The CTS requires that inoperable (and stuck) control rods be positioned such that SDM requirements are maintained. The CTS also requires the reactor to be in Cold Shutdown within 24 hours (see DOC L6) when a control rod is first found to be stuck. The ITS 3.1.3 includes additional requirements that: a) with one stuck rod, SDM be verified within 72 hours; b) with more than one stuck rod, the reactor be in Hot Shutdown within 12 hours; and c) with one or more inoperable control rods, each inoperable control rod must be inserted. In addition, if the first or third requirement listed above cannot be met the reactor must be placed in MODE 3 in 12 hours.	3.1.3 Required Actions A.4, B.1, C.1 and E.1	3.3.A.2.e
M6	The CTS specifies a maximum scram time, but does not include an explicit Surveillance with an appropriate Frequency that verifies the maximum scram time. The ITS includes a Surveillance with an appropriate Frequency (in accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4).	SR 3.1.3.4	3.3.C.3
3.1.4, CONTROL ROD SCRAM TIMES			

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS gives the Applicability of minimum scram times as "in the reactor power operation condition," which is defined as greater than 1% RTP. The ITS has minimum scram times limits applicable during MODES 1 and 2.	3.1.4 Applicability	3.3.C.1
M2	Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 10, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds.	LCO 3.1.4, Table 3.1.4-1	3.3.C
M3	An additional Surveillance is added to perform scram time tests on all control rods prior to exceeding 40% RTP after each reactor shutdown ≥ 120 days.	SR 3.1.4.1	N/A
M4	Two Surveillance Requirements are added requiring a scram time test after work on a control rod or CRD that could affect the scram time (SRs 3.1.4.3 and 3.1.4.4 2nd Frequency) and after fuel movement within affected core cells (SR 3.1.4.4 1st Frequency). SR 3.1.4.3 will require a scram time test, which may be done at any pressure, prior to declaring a control rod Operable (and thus, enabling its withdrawal during a startup). SR 3.1.4.4 will require a scram time test after reactor pressure has reached ≥ 800 psig and prior to exceeding 40% RTP. To allow testing at less than normal operating pressures, a requirement for scram time limits at < 800 psig (any reactor steam dome pressure) is included. ITS 3.1.4-1 Note (b) indicates that the scram times as a function of reactor steam dome pressure must be within established limits when reactor steam dome pressure is < 800 psig.	SR 3.1.4.3, SR 3.1.4.4, Table 3.1.4-1 Note (b)	N/A
M5	The CTS requirement to place the plant in the cold shutdown condition within 24 hours if the scram time limits are not met has been changed in the ITS to require the plant to be in MODE 3 within 12 hours.	3.1.4 Required Action A.1	3.3.E
M6	Changes the pressure at which the control rods must be tested from > 950 to ≥ 800 psig, corresponding to the limiting pressure for CRD scram testing for the FitzPatrick CRD System.	SR 3.1.4.2, SR 3.1.4.4	4.3.C.1, 4.3.C.2
3.1.5, CONTROL ROD SCRAM ACCUMULATORS			
M1	The CTS requires a check of the status of the pressure and level alarms for each control rod scram accumulator once per week. The ITS adds the acceptance criteria for accumulator pressure (≥ 940 psig).	SR 3.1.5.1	4.3.A.2.c
3.1.6, ROD PATTERN CONTROL			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires that MFLPD be determined "daily during reactor power operation at ≥ 25% rated thermal power". The ITS Frequency is "within 12 hours after ≥ 25% RTP AND 24 hours thereafter". In addition, the CTS for MFLPD also has requirements to adjust APRM setpoints if necessary in accordance with the COLR with the same Frequency as the MFLPD determination. The ITS establishes a specific Frequency of every 12 hours. These changes require the first MFLPD determination within 12 hours while the current specification requires the same determination be made within 24 hours after RTP ≥ 25% RTP, and the APRM setpoint adjustment is required at a 12 hour Frequency and not the 24 hour Frequency presently permitted.	SR 3.2.4.1, SR 3.2.4.2	4.1.B

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M8	The CTS specifies that the response time of the reactor protection system trip functions listed shall be demonstrated to be within its limit once per 24 months. Each test shall include at least one channel in each trip system. All channels in both trip systems shall be tested within two test intervals. In the ITS, the RPS RESPONSE TIME test must be performed every 24 months on a STAGGERED TEST BASIS. In addition, a Note to this SR specifies that "n" equals 2 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. Therefore, the ITS will require all channels requiring response time testing to be tested in two (2) surveillance intervals. This change is more restrictive since at least eight (8) ITS 3.3.1.1 Function 5 (Main Steam Isolation Valve — Closure) channels and four (4) ITS 3.3.1.1 Function 8 (Turbine Stop Valve — Closure) channels must be tested each interval instead of one channel in each trip system required by the CTS.	SR 3.3.1.1.15	4.1.A
M9	Not Used.	N/A	N/A
M10	The CTS requires a heat balance for APRM High Flux Output Signal calibration; however, no acceptance criteria is provided. The ITS requires that the absolute difference between the APRM channels and the calculated power be ≤ 2% RTP plus any gain adjustment required by LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint" while operating at ≥ 25% RTP.	SR 3.3.1.1.2	Table 4.1-2 Calibration Frequency for Instrument Channel 2
M11	Not Used.	N/A	N/A
M12	The CTS requires actuation of the MSIV Closure limit switches and Turbine Stop Valve Closure pressure switches by normal means every 24 months. The ITS requires an actual Channel Calibration of these instruments every 24 months to ensure channel OPERABILITY.	SR 3.3.1.1.12	Table 4.1-2 Note 4
M13	A new Surveillance Requirement has been added to verify, every 24 months, the Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, EHC Oil Pressure — Low Functions are not bypassed when THERMAL POWER is ≥ 29 % RTP.	SR 3.3.1.1.14	N/A
M14	The CTS requires a comparison of the IRM channels with the APRM channels on a controlled shutdown. However, the requirement is only associated with the IRM High Flux Function. In the ITS, this Surveillance is associated with not only the IRM Neutron Flux-High, but also the APRM Neutron Flux-High (Startup). In addition, a Note is included in the ITS that states the SR is only required to be met during entry into MODE 2 from MODE 1 since this is when the IRM and APRM channels are designed to overlap with one another. Currently, the Surveillance implies that the calibration is to be performed on controlled shutdowns only.	SR 3.3.1.1.6	Table 4.1-2 Calibration Frequency for Instrument Channel 1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M15	The CTS actions for the APRM Inoperative Function provides an option of either inserting all Operable rods within 4 hours (being in MODE 3), or reducing power to the IRM range and placing the reactor mode selector switch in startup (being in MODE 2) within 8 hours if the APRM Inoperative Function has less than the minimum number of Operable channels per trip system. The ITS requires entry into MODE 3 since the APRM Inoperative Function is required in MODES 1 and 2.	3.3.1.1 ACTION G	Table 3.1-1 Notes 3.A and 3.B
(1) M16	~~The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A19) for the Reactor High Pressure Trip Function has been changed from ≤ 1080 psig to ≤ 1079 psig.~~ Not used.	~~Table 3.3.1.1-1 Allowable Value for Function 3~~ N/A	~~Table 3.1-1 Trip Level Setting for Trip Function 9~~ N/A
(1) M17	Insert M17	3.3.1.1 ACTION F	Table 3.3-1 Note 3.B
	3.3.1.2, SRM INSTRUMENTATION		
M1	The CTS require two Source Range Monitors (SRMs) to be Operable whenever control rods are withdrawn for startup. The ITS will require three SRMs to be Operable at all times in MODE 2 until the flux level is sufficient to maintain the Intermediate Range Monitor on Range 3 or above.	Table 3.3.1.2-1 Function 1, including footnote (a)	3/4.3.B.4
M2	A new requirement is being added to require 2 SRM channels to be Operable at all times in MODE 3 and MODE 4 because the SRMs are the primary indication of neutron flux levels in these MODES. In addition, an appropriate ACTION and Surveillance Requirements have also been added.	Table 3.3.1.2-1, 3.3.1.2 ACTION D, SR 3.3.1.2.3, SR 3.3.1.2.4, SR 3.3.1.3.6, SR 3.3.1.2.7	N/A
M3	The CTS requires a count rate verification "prior to control rod withdrawal for startup or during refueling." The CTS also requires a count rate verification "prior to making alterations to the core" and daily thereafter. The ITS will requires periodic verification of the SRM count rate at least once per 24 hours while in MODE 2 when IRMs are on Range 2 or below and every 12 hours during CORE ALTERATIONS.	SR 3.3.1.2.4	4.3.B.4, 4.10.B
M4 (e)	Two new MODE 2 (when IRMs are on Range 2 or below) Surveillance Requirements are being added. The new Surveillances will require a) performance of an SRM Channel Check every 12 hours; and b) performance of an SRM Channel Functional Test and determination of signal to noise ratios every 31 days. In addition, the Channel Functional Test Surveillance is modified by a Note that will allow deferral of this Surveillance until 12 hours after the IRMs are on Range 2 or below when the reactor is being shutdown.	SR 3.3.1.2.1, SR 3.3.1.2.6	N/A

(1) Revision I change

INSERT M17

The CTS requires the plant to be in Startup within 8 hours when CTS Table 3.3-1 Notes 1 and 2 (as applicable) are not met for inoperable APRM Flow Referenced Neutron Flux or APRM Fixed High Neutron Flux High channels. The ITS will require the plant to be in MODE 2 within 6 hours, a decrease of 2 hours.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M5	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required SRM is inoperable. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.3.1.2 Required Action C.1	N/A
M6	A new Surveillance Requirement is being added to verify every 12 hours during CORE ALTERATIONS that the SRMs are properly located.	SR 3.3.1.2.2	N/A
M7	A new Surveillance Requirement is being added to state that the 3 cps count rate requirement is based on a signal to noise ratio of ≥ 2:1. Currently, the CTS just list the count rate requirement but does not specify what signal to noise ratio it is based upon. 3	SR 3.3.1.2.4	3.4.3.B.4, 3.10.B.2
M8	The CTS does not specify any Required Actions if SRM Operability requirements in MODE 5 are not satisfied. The ITS includes Required Actions if less than the required number of SRMs are Operable in MODE 5. If one or more required SRMs are inoperable when in MODE 5, the ITS will require that CORE ALTERATIONS be terminated and action be taken immediately to fully insert all control rods in core cells containing one or more fuel assemblies.	3.3.1.2 ACTION E	N/A
M9	A new MODE 5 Surveillance Requirement has been added to perform a Channel Calibration every 92 days. In addition, the Surveillance has been modified by a Note that excludes the neutron detectors from calibration requirements.	SR 3.3.1.2.7	N/A
M10	The CTS requires the SRMs to be functionally tested prior to making Core Alterations. The ITS requires a CHANNEL FUNCTIONAL TEST be performed every 7 days when in MODE 5, which includes Core Alterations. In addition, the ITS also requires the determination of the signal to noise ratio (as modified by the SR Note).	SR 3.3.1.2.5	4.10.B
M11	The CTS requires the SRMs to be checked for neutron response prior to Core Alterations and checked daily thereafter. The ITS requires the performance of a CHANNEL CHECK every 12 hours during MODE 5 (which includes Core Alterations).	SR 3.3.1.2.1	4.10.B
	3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION		
M1	A new Function has been included in the ITS. 2 channels of the Rod Block Monitor-Inop Function are now required to be Operable consistent with the Applicability with the other Rod Block Monitor Functions. In addition, appropriate ACTIONS and Surveillance Requirement have also been added.	Table 3.3.2.1-1 Function 1.b, 3.3.2.1 ACTIONS A and B, SR 3.3.2.1.1, SR 3.3.2.1.4	N/A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	A new Function has been included in the ITS. 2 channels of the Rod Block function of Reactor Mode Switch — Shutdown Position must be Operable whenever the Mode Switch is in the Shutdown position. In addition, an appropriate ACTION and a Surveillance Requirement have also been added.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.1.2.7	N/A
M3	The CTS provides a restoration time of 7 days when one RBM channel is inoperable. The ITS will only allow 24 hours for the same condition.	3.3.2.1 Required Action A.1	Table 3.2-3 Note 2 Action B.a)
M4	A new Surveillance has been added to verify, every 92 days, that the RBM-Upscale and -Downscale Functions are not bypassed at Thermal Power > 30% RTP and when a peripheral control rod is not selected.	SR 3.3.1.2.4	N/A
M5	A new Surveillance Requirement is being added to perform, every 92 days, a CHANNEL FUNCTIONAL TEST in MODE 1 when Thermal Power is ≤ 10% to ensure the RWM is Operable with the reactor mode switch in RUN.	SR 3.3.2.1.3	N/A
M6	A new Surveillance Requirement is being added to verify every 24 months that the Rod Worth Minimizer is not bypassed when Thermal Power is ≤ 10%.	SR 3.3.2.1.6	N/A
	3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION		
1 ~~M1~~ NONE	The ~~CTS~~ Trip Level Setting (changed to Allowable Value as discussed in DOC A6) for ~~the Reactor Vessel Water Level~~ High Trip Function ~~has been~~ changed from ≤ 222.5 inches ~~to ≤ 222.4 inches.~~ NONE	~~SR 3.3.2.3~~ NONE	NONE ~~Table 3.2-6 Trip Level Setting~~
	3.3.3.1, PAM INSTRUMENTATION		
M1	The required number of channels for all CTS PAM instrumentation Functions maintained in the ITS is being increased from 1 channel to 2 channels in the ITS. In addition, the CTS allows 30 days to restore the one required channel (i.e., both channels are inoperable, since only one of the two is required to be Operable). Under the same conditions (both required channels inoperable), the ITS will only allow 7 days to restore one of the channels. Also, the ITS limits the time one of the two required channels can be inoperable to 30 days, and if not restored, requires a special report to be submitted to the NRC.	Table 3.3.3.1-1 Functions 1 through 6 and 8 through 10 Required Channels, 3.3.3.1 ACTIONS A, B, and C	Table 3.2-8 Instruments 4 through 14 Minimum no. of Operable Channels Required, Table 3.2-8 Notes A and F

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.5.1, ECCS INSTRUMENTATION		
M1	The CTS minimum number of Operable Channels for the Condensate Storage Tank Level - Low Trip Function has been increased from 2 channels to 4 channels in the ITS, since there are two condensate storage tanks, and each have 2 channels.	Table 3.3.5.1-1 Function 3.d	Table 3.2-2 Item No. 17
M2	Five new Functions have been included in the ITS: a) Core Spray Pump Discharge Flow — Low (Bypass); b) Core Spray Pump Discharge Pressure — High (Bypass); c) Low Pressure Coolant Injection Pump Discharge Flow — Low (Bypass); d) High Pressure Coolant Injection Pump Discharge Flow — Low (Bypass); and e) High Pressure Coolant Injection Pump Discharge Pressure — High (Bypass). In addition, and appropriate ACTION and Surveillance Requirements have also been added.	Table 3.3.5.1-1 Functions 1.e, 1.f, 2.g, 3.f, and 3.g, 3.3.5.1 ACTION E, SR 3.3.5.1.3, SR 3.3.5.1.6	N/A
M3	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for the reactor water level high and low, drywell pressure high, and reactor pressure low Instrument Channels.	SR 3.3.5.1.1 for Functions 1.a, 1.b, 1.c, 2.a, 2.b, 2.c, 2.d, 2.e, 3.a, 3.b, 3.c, 4.a, 4.c, 5.a, and 5.c	Table 4.2-2 Instrument Check Frequency for Instrument Channels 1, 2b, and 3b
M4	Not used.	N/A	N/A
M5	Not used.	N/A	N/A
M6	The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A12) for the Reactor Low Level (inside shroud) Trip Function from ≥ 0.0 inches to ≥ 1.0 inches.	Table 3.3.5.1-1 Function 2.e Allowable Value	Table 3.2-2 Item No. 5 Trip Level Setting
~~M7~~ (1)	~~The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A12) for the Reactor High Water Level Trip Function has been changed from ≤ 222.5 inches to ≤ 222.4 inches.~~	~~Table 3.3.5.1-1 Function 3.c Allowable Value~~	~~Table 3.2-2 Item No. 3 Trip Level Setting~~
	3.3.5.2, RCIC SYSTEM INSTRUMENTATION		

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for the reactor water level high and low Instrument Channels.	SR 3.3.5.2.1 for Functions 1 and 2	Table 4.2-2 Instrument Check Frequency for Instrument Channel 1
M2	A new Function has been added. The ITS requires 1 channel of the RCIC Manual initiation Function to be Operable in MODE 1 and MODES 2 and 3 with reactor steam dome pressure > 150 psig. In addition, appropriate ACTIONS and a Surveillance Requirement have also been added.	3.3.5.2 Applicability, Table 3.3.5.2-1 Function 4, 3.3.5.2 ACTIONS C and E, SR 3.3.5.2.6	N/A
M3	The CTS minimum number of Operable Channels for the Condensate Storage Tank Level - Low Trip Function has been increased from 2 channels to 4 channels in the ITS, since there are two condensate storage tanks, and each have 2 channels.	Table 3.3.5.2-1 Function 3	Table 3.2-2 Item No. 16
~~M4~~	~~The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A9) for the Reactor High Water Level Trip Function has been changed from ≤ 222.5 inches to ≤ 222.4 inches.~~	~~Table 3.3.5.2-1 Function 2 Allowable Value~~	~~Table 3.2-2 Item No. 4 Trip Level Setting~~
	3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION		
M1	The CHANNEL FUNCTIONAL TEST Frequency is being increased from every 24 months (R) in the CTS to every 92 days in the ITS for the containment high range radiation monitor. In addition, a LOGIC SYSTEM FUNCTIONAL TEST 24 month Surveillance is also being added for this Function.	SR 3.3.6.1.2 and SR 3.3.6.1.7 for Table 3.3.6.1-1 Function 2.c	Table 4.2-8 Instrument Functional Test Frequency for Instrument 4
M2	The ITS includes a new Applicability of MODES 4 and 5 for the RHR SDC Reactor Vessel Water Level - Low Function. Also, the ITS includes a Note that only one trip system is required in MODES 4 and 5, provided the RHR SDC System integrity is maintained. In addition, an appropriate ACTION has also been added.	Table 3.3.6.1-1 Function 6.b (including Note e), 3.3.6.1 ACTION J	Table 3.2-1 Trip Function 1
M3	Not used.	N/A	N/A

1. Revision I change

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS specifies that the main steam isolation valve actuation instrumentation response time for the specified trip functions must be demonstrated to be within its limit once per 24 months. Each test shall include at least one channel in each trip system. All channels in both trip systems shall be tested within two test intervals. In the ITS, the ISOLATION INSTRUMENTATION RESPONSE TIME test must be performed every 24 months on a STAGGERED TEST BASIS. In addition, a Note to this SR specifies that "n" equals 2 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. Therefore, the ITS will require all channels requiring response time testing to be tested in 2 surveillance intervals. This change is more restrictive since 2 channels must be tested each interval for Functions 1.a and 1.b while 8 channels must be tested each interval for Function 1.c instead of one channel in each trip system required by the CTS.	SR 3.3.6.1.8	4.2.A
M5	Not Used.	N/A	N/A
M6	The required number of OPERABLE channels in each trip system for HPCI and RCIC Steam Line Low Pressure and HPCI and RCIC Turbine High Exhaust Diaphragm Pressure Functions are increased from 1 in the CTS to 2 in the ITS.	Table 3.3.6.1-1 Functions 3.b, 4.b, 3.c, and 4.c	Table 3.2-1 Trip Functions 14, 15, 18, and 19
M7	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required instrumentation channel is not restored/tripped within the allowed times. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.3.6.1 Required Actions D.2.1 and H.1	N/A
M8	The Completion Time provided to close the affected isolation valves is decreased from 4 or 8 hours in the CTS to 1 hour in the ITS.	3.3.6.1 Required Action F.1	Table 3.2-1 Notes 3.C, 3.D, and 3.E
M9	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for various primary containment isolation instrument channels.	SR 3.3.6.1.1	Table 4.1-1, 4.2-1, and 4.2-8
M10	The required number of OPERABLE channels in each trip system for the containment high range radiation monitor Function are increased from 1 in the CTS to 2 in the ITS. In addition, the CTS allowed restoration time from the one channel has been changed from 30 days to 24 hours in the ITS. Also, since both channels are currently required to be Operable, an allowance is necessary to perform the associated Surveillances while in the applicable modes consistent with other Primary Containment Isolation Functions. Therefore, an ITS Note will delay entry into the associated Conditions and Required Action for 6 hours as long as isolation capability is maintained.	Table 3.3.6.1-1 Function 2.c, 3.3.6.1 ACTION A, Note 2 to Surveillance Requirements	Table 3.2-8 Instrument 4, including Note A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M11	A new Function has been added. The ITS requires 2 channels of the SLC System Initiation Function to be Operable in MODES 1 and 2. In addition, appropriate ACTIONS and a Surveillance Requirement have also been added.	Table 3.3.6.1-1 Function 5.d, including footnote d, 3.3.6.1 ACTIONS A, B, and I	N/A
M12	The CTS allowance to delay entry into the associated Limiting Conditions for Operation and required action for 6 hours during the performance of instrumentation surveillances when primary containment isolation valves are placed in an inoperable status has not been included in the ITS.	N/A	Table 3.2-1 Note 2
M13	The CTS Applicability of the primary containment isolation instrumentation is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the primary containment isolation instrumentation must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	Table 3.3.6.1-1	3.2.A, Table 3.2-1 Note 1
M14	The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A16) for the following Functions have been changed: HPCI Steam Line Low Pressure, Main Steam Line Leak Detection High Temperature, HPCI and RCIC Steam Line/Area Temperature, RWCU System Equipment Area Temperature, Reactor High Pressure (SDC), RCIC Turbine High Exhaust Diaphragm Pressure, RCIC Turbine Steam Line High Flow, HPCI Turbine High Exhaust Diaphragm Pressure, and RCIC Steam Line Low Pressure.	Table 3.3.6.1-1 Allowable Values for Functions 1.e, 3.b, 3.c, 3.d, 3.e, 3.f, 3.g, 3.h, 3.i, 3.j, 4.a, 4.b, 4.c, 4.d, 4.e, 4.f, 5.a, 5.b, 5.c, 5.d, and 6.a	Table 3.2-1 Trip Level Setting for Trip Functions 3, 10, 11, 14, 15, 16, 17, 18, 19, and 20
(1) M15	Insert M15	3.3.6.1 ACTIONE	Table 3.2-1 Note 3.B

INSERT M15

CTS Table 3.2-1 Note 3.B requires the main steam lines to be isolated within 8 hours when CTS Table 3.2-1 Notes 1 and 2 (as applicable) are not met for inoperable Main Steam Line Low Pressure channels. However, the Main Steam Line Low Pressure channels are only required to be Operable in the Run Mode (MODE 1), as stated in CTS Table 3.2-1 Note 5. As stated in CTS 3.0.A, once the plant is placed in the Startup/Hot Standby Mode (MODE 2), the Main Steam Line Low Pressure channels are no longer required to be Operable; thus the requirement in CTS Table 3.2-1 Note 3.B to isolate the main steam lines is no longer required. Effectively, the CTS requires the plant to be placed in MODE 2 within 8 hours. The ITS provides an Action consistent with the Applicability of the Main Steam Line Low Pressure channels; it requires the plant to be placed in MODE 2. However, in lieu of the CTS time of 8 hours to complete this action, the ITS requires MODE 2 to be reached in 6 hours, a decrease of 2 hours.

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	CTS 3.6.D.4 requires the operability of the Primary Containment Sump Monitoring System and the Continuous Atmosphere Monitoring System. CTS 3.6.D.5 provides the appropriate actions if the Primary Containment Sump Monitoring System is inoperable and CTS 3.6.D.6 provides the appropriate actions if the Continuous Atmosphere Monitoring System (particulate and gaseous) is inoperable. The CTS does not provide any restrictions if both the Primary Containment Sump Monitoring System and the Continuous Atmosphere Monitoring System are inoperable at the same time. The ITS includes an ACTION that requires ITS LCO 3.0.3 be entered immediately if all leakage detection systems are inoperable.	3.4.5 ACTION E	N/A
	(particulate and gaseous)		
	3.4.6, RCS SPECIFIC ACTIVITY		
M1	A new action has been added that will require the determination of DOSE EQUIVALENT I-131 every 4 hours whenever the DOSE EQUIVALENT I-131 specific activity limit is exceeded. Currently, the CTS does not require this action.	3.4.6 Required Actions A.1 and B.1	N/A
M2	The CTS requires the reactor to be placed in the cold shutdown condition (MODE 4) within 24 hours if the iodine concentration exceeds the equilibrium limit by more than a factor of 10. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.4.6 Required Action B.2.2.1	N/A
M3	The Frequency to perform an isotopic analysis of a sample of reactor coolant every 31 days has been changed to at least once per 7 days.	SR 3.4.6.1	4.6.C.1.b
	3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN		
M1	A new Specification is being added requiring two RHR shutdown cooling subsystems to be Operable in MODE 3 with reactor steam dome pressure less than the shutdown cooling permissive pressure. Appropriate Actions and a Surveillance Requirement are also being added. Currently, no Specification exists.	3.4.7	N/A
	3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN		
M1	A new Specification is being added requiring two RHR shutdown cooling subsystems to be Operable in MODE 4. Appropriate Actions and a Surveillance Requirement are also being added. Currently, no Specification exists.	3.4.8	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS - OPERATING		
M1	The CTS permits up to 10 days of continuous operation from the time steam becomes available until HPCI Surveillances need to be performed. The Notes to the applicable ITS Surveillances will allow only 12 hours from the time reactor steam pressure and flow are adequate to perform the test. The 12 hours is deemed to be adequate to perform the testing involved without impacting plant operation.	SR 3.5.1.8 Note, SR 3.5.1.9 Note, SR 3.5.1.10 Note 1	4.5.C
M2	The CTS requires that HPCI deliver at least 4,250 gpm (modified by DOC L7) is being divided into two separate Surveillance Requirements. The first ITS Surveillance will require a demonstration of the HPCI pump capability at nominal conditions (970 to 1040 psig in the reactor steam dome). Reactor pressures of ≥ 970 psig and ≤ 1040 psig represents a nominal value at rated conditions within the CTS required band for testing. This pressure range represents conditions of lower driving pressure for the HPCI turbine and thus, a more restrictive condition under which to provide the required flow. The second ITS Surveillance will require a demonstration of the HPCI pump capability ≤ 165 psig. Reactor pressure of ≤ 165 psig is near the lower limit (i.e., ≥ 150 psig) of operability/capability of the HPCI turbine, yet provides a 15 psig range above the lower limit in which to conduct the test. CTS required that the HPCI test confirm the capability of the pump at 150 psig. As a practical consideration, the test is performed when sufficient pressure is available at near 150 psig. To require the test at ≤ 150 psig would be to require a test of the capability of the pump outside the required operability range.	SR 3.5.1.8, SR 3.5.1.9	4.5.C.1
M3	The CTS requires that at least 5 of the 7 ADS valves be Operable. The ITS requires that at least 6 of the ADS valves be Operable. The proposed change also adds two Actions that do not exist in the CTS. The first Action contains requirements for what to do if one of the six required ADS valves is inoperable. The Action allows up to 14 days to restore the inoperable ADS valve. The second ACTION limits continued reactor operation to 72 hours when there is a simultaneous inoperability of one required ADS valve (one of the six required ADS valves) and one low pressure ECCS (CS or LPCI) subsystem or one LPCI pump inoperable in each subsystem. These requirements are more restrictive because current requirements would allow continued plant operation under the same conditions.	LCO 3.5.1. 3.5.1 ACTIONS E and F	3.5.D.1
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the ACTIONS or Completion Times associated with an inoperable LPCI or CS System cannot be satisfied, when the ACTIONS associated with an inoperable HPCI or ADS System cannot be satisfied, and when both LPCI independent power supplies are made or found to be inoperable. This specific default action has been interpreted to also require entry when the ACTIONs or Completion Times associated with one inoperable LPCI independent power supply are not met since no other exists. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.5.1 Required Actions B.1 and G.1	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, PRIMARY CONTAINMENT		
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment is inoperable. In the ITS (after a short restoration time as discussed in DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.1 Required Action B.1	N/A
M2	The CTS requires the drywell to suppression chamber leak rate to be verified. The ITS includes a new requirement that if two consecutive leak tests fail, the leak test must be repeated every 12 months until two consecutive leak tests pass. Two consecutive test failures would indicate unexpected primary containment degradation, and increasing the Frequency to once every 12 months establishes the acceptability of the drywell to suppression chamber leakage sooner.	SR 3.6.1.1.2 second Frequency	N/A
M3	The CTS Applicability of the Primary Containment is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.1 Applicability	3.7.A.2
M4	The CTS requirement that the drywell to suppression chamber leak rate test be conducted at 1 psid is being changed to a differential pressure of ≥ 1 psi.	SR 3.6.1.1.2	4.7.A.5.d
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS		
M1	The CTS requirement that requires at least one door in each air lock is closed and sealed is being revised to require both air lock doors be OPERABLE in the ITS. In addition, appropriate ACTIONS have been added for when one of the two doors is inoperable.	LCO 3.6.1.2, 3.6.1.2 ACTION A	3.7.A.2, 1.0.M
(1) M2	A New Surveillance Requirement has been added to verify that only one door in the primary containment air lock can be opened at a time. In addition, a new ACTION has been added to cover the case when an interlock mechanism is inoperable. Currently, the CTS does not require the interlock mechanism to be Operable.	3.6.1.2 ACTION B, SR 3.6.1.2.2	~~4.7.A.2~~ N/A
(1) M3	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment Air Lock(s) is inoperable. In the ITS (after the appropriate restoration times as discussed in DOCs M1, M2, and L3), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.2 Required Action D.1	~~3.7.A.8~~ N/A

1. This is a new requirement that is not in the CTS. Thus there is no CTS Section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS Applicability of the Primary Containment Air Locks is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment Air Locks must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.2 Applicability	3.7.A.2
	3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES		
M1	The CTS Applicability of the Primary Containment Isolation Valves is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment Isolation Valves must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F. In addition, the ITS includes an Applicability of "When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation."" This effectively adds a MODES 4 and 5 requirement for the RHR SDC isolation valves. Due to this addition, a new ACTION has been added for these valves.	3.6.1.3 Applicability, 3.6.1.3 ACTION G	3.7.D.1
M2	The CTS surveillance that tests for proper operation of the instrument line EFCVs does not include an acceptance criteria. The ITS specifies an acceptance criteria that the EFCVs actuate to the isolation position on a simulated instrument line break.	SR 3.6.1.3.8	4.7.D.1.b
M3	The CTS surveillance that tests and times the closure of the MSIVs does not include a closure time. The ITS specifies an MSIV closure time of ≥ 3 seconds and ≤ 5 seconds.	SR 3.6.1.3.6	4.7.d.1.d
(1) M4	The ITS includes four new Surveillance Requirements to a) verify (each 31 days) each PCIV manual isolation valve, or blind flange that is located outside of primary containment and not locked, sealed or otherwise secured and is required to be closed during accident conditions is closed; b) verify (prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days) each PCIV manual isolation valve, or blind flange that is located inside of primary containment and not locked, sealed or otherwise secured and is required to be closed during accident conditions is closed; c) verify (each 31 days) continuity of the traversing incore probe (TIP) shear isolation valve explosive charge; and d) remove and test (each 24 months on a STAGGERED TEST BASIS) the explosive squib from each shear isolation valve of the Tip System.	SR 3.6.1.3.2, SR 3.6.1.3.3, SR 3.6.1.3.4, SR 3.6.1.3.9	~~4.7.d~~ N/A
(1) M5	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment Isolation Valves are not restored to Operable status within certain time limits. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.3 Required Action F.1	~~3.7.B.3~~ N/A

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	A new Surveillance Requirement has been added to verify that the reactor building-to-suppression chamber self actuating vacuum breakers are capable of full opening at a differential pressure of < 0.5 psid.	SR 3.6.1.6.4	N/A
(1) M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable reactor building-to-suppression chamber vacuum breaker is not met or when two vacuum breakers are inoperable. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.6 Required Action E.1	~~3.7.A.8~~ N/A
M5	The CTS requires a functional test of the instrumentation associated with the suppression chamber-reactor building vacuum breakers every 92 days, and also requires the setpoint to be at ≤ 0.5 psi. The ITS requires a CALIBRATION (instead of a function test) of each air operated vacuum breaker differential pressure instrument channel, including a verification that the setpoint is ≤ 0.5 psid. This change is more restrictive since it will require a complete check of each instrument loop and the sensor.	SR 3.6.1.6.3	4.7.A.4.b
M6	The CTS Applicability of the reactor building-to-suppression chamber vacuum breakers is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the reactor building-to-suppression chamber vacuum breakers must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.6 Applicability	3.7.A.4.a

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M7	The CTS identifies that two reactor building-to-suppression chamber vacuum breakers shall be OPERABLE. The ITS LCO requires each of the two vacuum breakers (the self actuated valve and the air operated valve) in each of the two vacuum relief lines shall be OPERABLE. The CTS identifies the Required Actions if one reactor building-to-suppression chamber vacuum breaker is inoperable (without specifying whether the vacuum relief or the containment isolation function of the valve is inoperable). The CTS has been modified to specifically address inoperability of the containment isolation function of one vacuum breaker valve. If more than one vacuum breaker is inoperable (or the actions and associated completion times are not met), the default action of the CTS must be entered which requires the reactor be placed in the cold condition within the following 24 hours. The CTS has been modified by providing additional more restrictive actions that specifically address the inoperability of containment isolation functions and vacuum relief of the vacuum breaker valves in each of the vacuum relief lines. The ITS ACTIONS: a) addresses inoperability of the containment isolation function of two (both) vacuum breakers in a line and consistent with ITS 3.6.1.3, ACTION B, 1 hour is allowed to correct the loss of containment capability; b) addresses the inoperability of the vacuum relief function of one vacuum relief line due to one or more vacuum breaker valves in the line not being capable of opening (while the vacuum relief function is maintained by the vacuum relief valves in the other line) and 72 hours is allowed to correct the condition; and c) addresses loss of the vacuum relief function of two (both) vacuum relief lines and 1 hour is allowed to correct the condition.	3.6.1.6 LCO 3.6.1.6 ACTIONS B, C, and D	3.7.A.4.a, 3.7.A.4.b
	3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS		
M1	A new Surveillance Requirement has been added to verify that each suppression chamber-to-drywell vacuum breaker is closed every 14 days.	SR 3.6.1.7.1	N/A
M2	The CTS allows 7 days to restore an inoperable suppression chamber-to-drywell vacuum breaker. In the ITS, restoration is required within 72 hours.	3.6.1.7 ACTION A	3.7.A.5.c, 3.7.A.5.g
M3	The CTS requires an inoperable vacuum breaker (i.e., an open vacuum breaker) to be locked closed; however no specific time is provide to close the vacuum breaker. The ITS will require the open vacuum breaker to be closed within 2 hours. The requirement to lock the vacuum breaker closed is not included in the ITS, since once the open vacuum breaker is closed, it is now considered Operable.	3.6.1.7 ACTION B	3.7.A.5.g
(1) M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable suppression chamber-to-drywell vacuum breaker is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.7 Required Action C.1	~~3.7.A.8~~ N/A

1. This is a new requirement that is not in the CTS. Thus there is NO CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M5	The CTS Applicability of the suppression chamber-to-drywell vacuum breakers is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression chamber-to-drywell vacuum breakers must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.7 Applicability	3.7.A.4.a
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION (MSLC) SYSTEM			
M1	A new Specification requiring two MSLC subsystem to be Operable is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.6.1.8	N/A
3.6.1.9, RHR CONTAINMENT SPRAY			
1 M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable RHR containment spray subsystem is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.9 Required Action C.1	~~3.5.B.4~~ N/A
M2	The CTS requires a pump operability and flow rate test, but no acceptance criteria is provided. The ITS includes a specific flow rate and flow path.	SR 3.6.1.9.2	4.5.B.1.a
3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE			
M1	The ITS includes a new action to verify temperature is ≤ 110 °F once per hour when the temperature has exceeded 95 °F and no testing that adds heat to the suppression pool is being performed.	3.6.2.1 Required Action A.1	N/A
M2	The ITS includes new actions if the temperature is > 110 °F. In addition to requiring a reactor scram (which is consistent with the CTS requirements), the ITS will require suppression pool temperature to be verified ≤ 120 °F once per 30 minutes and that the reactor be placed in MODE 4 within 36 hours.	3.6.2.1 Required Actions D.2 and D.3	N/A
M3	The CTS requires that, during reactor isolation conditions, the reactor pressure vessel be depressurized to less than 200 psig if pool temperature reaches 200 °F. The ITS requires the depressurization action regardless of whether or not the reactor is isolated. In addition, the ITS requires the depressurization to 200 psig to be completed within 12 hours and for the plant to be in MODE 4 within 36 hours.	3.6.2.1 ACTION E	3.7.A.1.c.(4)

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS Applicability of the suppression pool average temperature is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression pool average temperature must be within limits at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.2.1 Applicability	3.7.A.1
3.6.2.2, SUPPRESSION POOL WATER LEVEL			
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the suppression pool water level limits are not met. In the ITS (after the appropriate restoration time as modified by DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.2.2 Required Action B.1	~~3.7.A.8~~ N/A
M2	The CTS Applicability of the suppression pool water level is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression pool water level must be within limits at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.2.2 Applicability	3.7.A.1
3.6.2.3, RHR SUPPRESSION POOL COOLING			
M1	The CTS requires a pump operability and flow rate test, but no acceptance criteria is provided. The ITS includes a specific flow rate and flow path.	SR 3.6.2.3.2	4.5.B.1.a
M2	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable RHR suppression pool cooling subsystem is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.2.3 Required Action C.1	~~3.5.B.4~~ N/A
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE			
NONE	NONE	NONE	NONE
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION			

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
	3.6.3.2, CAD SYSTEM		
M1	A new Specification requiring two CAD subsystems to be Operable is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.6.3.2	N/A
	3.6.4.1, SECONDARY CONTAINMENT		
M1	The ITS includes an additional Applicability, during operations with a potential for draining the reactor vessel. An appropriate ACTION has also been added.	3.6.4.1 Applicability, 3.6.4.1 Condition C, 3.6.4.1 Required Action C.3	N/A
(1) M2	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Secondary Containment is inoperable. In the ITS (after a short restoration time as discussed in DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.4.1 Required Action B.1	~~3.7.C.2~~ N/A
M3	The CTS requires that if the Secondary Containment is inoperable, procedures shall be initiated to suspend activity that can reduce the shutdown margin and movement of irradiated fuel in the reactor building; however, no specific time limit to start or complete the actions is provided. The ITS will require immediate suspension of these activities.	3.6.4.1 Required Actions C.1 and C.2	3.7.C.2
M4	The CTS requires a demonstration of the secondary containment capability to maintain 1/4 inch of water vacuum in the secondary containment; however, no specific time duration for the test is provided. The ITS requires the test to be conducted for 1 hour.	SR 3.6.4.1.4	4.7.C.1.c
M5	The CTS requires a demonstration of the secondary containment capability to maintain 1/4 inch of water vacuum in the secondary containment using one filter train; however the test does not require testing the capability of both SGT trains. One SGT train could be used to perform the test over the life of the plant. The ITS requires the use of both SGT trains on a staggered test basis (i.e., each SGT train will be tested every two refueling outage cycles).	SR 3.6.4.1.4	4.7.C.1.c
M6	A new Surveillance Requirement is being added to verify that the secondary containment vacuum is $\geq$ 0.25 inches water gauge every 24 hours.	SR 3.6.4.1.1	N/A

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.4.3, SGT SYSTEM		
M1	The ITS includes an additional Applicability, during operations with a potential for draining the reactor vessel. An appropriate ACTION has also been added.	3.6.4.3 Applicability, 3.6.4.3 Conditions C and E, 3.6.4.3 Required Actions C.2.3 and E.3	N/A
M2	The CTS allows 31 days to restore a SGT subsystem when one is inoperable during refuel or cold shutdown. The ITS will only allow 7 days to restore the inoperable SGT subsystem.	3.6.4.3 ACTION A	3.7.b.2.B
M3	The CTS requires the reactor to be placed in a cold condition (MODE 4) when the inoperable SGT subsystem is not restored to Operable status within the allowed time; however, no time limit is provided for placing the plant in MODE 4. In the ITS, a 36 hour time limit is provided, and an intermediate condition, MODE 3, must be met within 12 hours.	3.6.4.3 ACTION B	3.7.B.3
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) when both SGT subsystems are inoperable while in MODE 1, 2, or 3; however, no time limit is provided for placing the plant in MODE 4. In the ITS, an entry into LCO 3.0.3 will be required, which will require action to be initiated within 1 hour to place the plant in MODE 2 within 7 hours, MODE 3 within 12 hours, and MODE 4 within 36 hours.	3.6.4.3 ACTION D	3.7.B.3

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M5	When the requirements of CTS 3.7.B.1 (both SGT subsystems required to be Operable) or 3.7.B.2 (plant operation is allowed to continue for a limited time period with one inoperable SGT subsystem provided the redundant SGT subsystem is verified Operable) cannot be met, CTS 3.7.B.3 requires an immediate plant shutdown and the suspension of fuel handling operations. If CTS 3.7.B.3 cannot be met, entry into CTS 3.O.C is permitted and the plant must be in COLD SHUTDOWN within 24 hours. Therefore, if the plant is operating in MODE 1, 2, or 3 and also handling fuel in the secondary containment, the CTS will require the plant to shutdown but not necessarily require the suspension of fuel handling since the default action (CTS 3.0.C) does not address suspension of fuel handling operations. Similarly, if CTS 3.7.B.3 can not be met during fuel handling operations while the plant is shutdown, default to CTS 3.0.C would not require any action to be taken since the plant would have previously been shutdown and suspension of fuel handling is not required by CTS 3.0.C. Required In ITS 3.6.4.3, if one SGT subsystem is inoperable and not restored to an Operable status within the allowed time (ITS 3.6.4.3, ACTION A.1 and associated Completion Time), while operating in MODE 1, 2, or 3 during fuel handling operations, ITS 3.6.4.3, ACTION B requires a plant shutdown and ITS 3.6.4.3, CONDITION C is concurrently applicable and ACTION C Note does not allow default to ITS 3.0.3 (since default to ITS 3.0.3 would allow ACTION C.1 (or ACTIONS C.2.1 and C.2.2, and C.2.3) to be bypassed). Therefore, the proposed addition of ITS 3.6.4.3, ACTION C Note, is an additional restriction that requires that the activities addressed in ACTION C.1 (or ACTIONS C.2.1, and C.2.2, and C.2.3) be taken rather than be bypassed by defaulting to ITS 3.0.3. In a similar manner, if the Required Actions and Completion Time of ACTION A can not be met during fuel handling operations while shutdown (MODE 4 or 5), the addition of proposed ITS 3.6.4.3, ACTION C Note does not allow default to ITS 3.0.3 and thus is a restriction that is not contained in CTS. In addition ITS 3.6.4.3, Required Action E.1 requires the immediate suspension of movement of irradiated fuel assemblies in the secondary containment, if both SGT subsystems are inoperable. The proposed addition of the Note to CTS 3.7.B.3 (ITS 3.6.4.3 Required Action E.1 Note), which states that LCO 3.0.3 is not applicable, is also a more restrictive change that requires the suspension of irradiated fuel handling operations since ~~default to ITS 3.0.3 is not allowed~~. Required Action Addition of the Note to ITS 3.6.4.3, ACTIONS C and E.1, provides clarification and is necessary because although defaulting to LCO 3.0.3 would require the reactor to be shutdown it would not require the suspension of the activities with the potential for releasing radioactive material to the secondary containment. Not allowing LCO 3.6.4.3, ACTION C, and Required Action E.1 to be bypassed by entry in LCO 3.0.3 ensures the suspension of these activities will be addressed, thus placing the plant in a condition that minimizes risk. Therefore, this change is more restrictive but necessary to minimize the probability of release when the secondary containment is not Operable.	3.6.4.3 Required Action C Note, 3.6.4.3 Required Action E.1 Note	3.7.B.3
M6	A new Surveillance Requirement is being added to operate each SGT subsystem for ≥ 10 continuous hours with heaters operating every 31 days.	SR 3.6.4.3.1	N/A

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, RHRSW SYSTEM		
(1) M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the ACTIONS or Completion Times associated with inoperable RHRSW pump(s)/subsystem(s) cannot be satisfied. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.7.1 Required Action E.1	~~3.5.B.4, 3.0.C~~ N/A
(1) M2	The CTS allows 7 days of operation with RHR service water subsystem inoperable. The ITS includes a Note that would require the applicable Conditions and Required Actions of ITS 3.4.7, "RHR Shutdown Cooling System - Hot Shutdown" to be entered for an RHR SDC subsystem made inoperable by the inoperable RHR Service Water System. This Note is an exception to proposed LCO 3.0.6, which ensures proper ACTIONS are taken for RHR shutdown cooling.	3.7.1 Required Action C.1 Note	~~3.5.B.3~~ N/A
	3.7.2, ESW SYSTEM and UHS		
(1) M1	The CTS requires the reactor to be placed in a cold condition within 24 hours when the ACTIONS or Completion Times associated with inoperable ESW subsystem(s) or inoperable deicing heater(s) cannot be satisfied. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.7.2 Required Action C.1	~~3.11.D.3, 3.11.E.1~~ N/A
M2	Two Surveillance Requirements have been added to verify the water level in each ESW pump screenwell (ensuring that adequate level for ESW pump submergence exists) and to verify the Ultimate Heat Sink temperature (ensuring the temperature of water to the required coolers is consistent with analyses).	SR 3.7.2.1, SR 3.7.2.2	N/A
M3	The CTS requires a minimum of 18 out of 88 heaters to be operable to maintain required flow for the ESW and RHRSW Systems. This requirement is not explicit as to whether heaters in both divisions are required. The ITS requires (in the Bases) that 18 heaters associated with each division are required to be Operable, for a total of 36 heaters.	3.7.2	3.11.E
	3.7.3, CREVAS SYSTEM		
M1	The CTS requires both of the control room emergency ventilation air supply fans and fresh air filter trains to be available whenever the reactor coolant is greater than 212°F and when fuel is handled. The ITS Applicability is during MODES 1, 2 and 3, during the movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS and during operations with a potential of draining the reactor vessel (OPDRVs). The ITS Applicability covers additional modes of operation.	3.7.3 Applicability	3.11.A.1

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS requires each control room emergency ventilation air supply fans and dampers to be tested for operability every 3 months; no time duration is specified for the test. The ITS requires the operation of each CREVAS subsystem every 92 days for a time period of greater than or equal to 15 minutes, where each CREVAS subsystem includes testing of the air handling unit fans and recirculation exhaust fans in addition to the air supply booster fans and dampers.	SR 3.7.3.1	4.11.A.1
M3	The CTS allows one emergency ventilation air supply fan and or filter (CREVAS subsystem) to be inoperable for 14 days. After this 14 day period, CTS 3.0.C must be entered since no specific default action exists in the CTS; therefore the plant must be placed in COLD SHUTDOWN within 24 hours. The ITS limits the time one CREVAS subsystem can be inoperable to 7 days, and then, if the unit is in MODES 1, 2, or 3, requires a shutdown to MODE 3 within 12 hours and to MODE 4 within 36 hours. If the plant is moving irradiated fuel in the secondary containment, performing CORE ALTERATIONS, or performing OPDRVs, then the ITS will require the immediate placement of the OPERABLE subsystem in the isolate mode of operation or to immediately suspend movement of irradiated fuel assemblies in the secondary containment, immediately suspend CORE ALTERATIONS and to immediately initiate action to suspend OPDRVs. A Note has been included to proposed ACTION D), which provides an exception to CTS 3.0.C (ITS LCO 3.0.3) if the Required Actions can not be met. This clarification was necessary because defaulting to LCO 3.0.3 would require the reactor to be shutdown but would not require the suspension of the activities that have the potential for releasing radioactivity that might require isolation of the control room and operation of CREVAS in the isolate mode.	3.7.3 ACTIONS A, C, and D	3.11.A.1, ~~3.0.C~~
M4	The CTS allows reactor or refueling operations to continue for 3 days with both control room emergency ventilation subsystems inoperable. After this time period the plant must be in a cold shutdown within 24 hours and any handling of irradiated fuel, core alterations, and operations with a potential for draining the reactor vessel shall be suspended as soon as practicable. The ITS does not allow this condition to occur; an shutdown will be required if both CREVAS subsystems are inoperable due to actual inoperability of the CREVAS subsystems. However, the ITS allows 24 hours to restore an inoperable control room boundary in MODES 1, 2, and 3. Failing to restore the boundary following these provisions, the plant is required to be in cold shutdown within 36 hours. In addition, the ITS provides an intermittent allowance to administratively open the control room boundary (which impacts both division of CREVAS).	3.7.3 LCO Note, 3.7.3 ACTIONS B, C, D, and E	3.11.A.3
M5	The CTS requires the main control room emergency ventilation air supply system capacity to be tested every 18 months to assure that it is within 10% of the design value of 1000 cfm. The ITS will require a verification that each CREVAS subsystem can maintain a positive pressure of ≥ 0.125 inches of water gauge relative to atmosphere and turbine building during the isolate mode of operation at a flow rate of ≤ 1100 cfm every 18 months on a STAGGERED TEST BASIS (added per DOC L1).	SR 3.7.3.3	4.11.A.5

1. Does not modify 3.0.C, only 3.11.A.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	The CTS requires the suspension of any handling of irradiated fuel, whenever both control room emergency ventilation systems are inoperable. If this action cannot be completed LCO 3.0.C must be entered and a plant shutdown is required. The ITS includes a Note that provides an exception to ITS LCO 3.0.3 if the Required Actions can not be met. This clarification was necessary because defaulting to LCO 3.0.3 would require the reactor to be shutdown but would not require the suspension of the activities that have the potential for releasing radioactivity that might require isolation of the control room and operation of the CREVAS System in the isolate mode.	3.7.3 ACTION E Note	3.11.A.3, 3.0.C
3.7.4, CONTROL ROOM AC SYSTEM			
M1	A new Specification is added that delineates specific requirements for operability of the Control Room Air Conditioning System. This system is necessary to assure the habitability of the control room in a post design basis accident environment. The new Specification requires two subsystems to be OPERABLE in MODES 1, 2 and 3; during the movement of irradiated fuel assemblies in the secondary containment; during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRV). Appropriate ACTIONS and a Surveillance Requirement have been added.	3.7.4	N/A
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS			
M1	The RETS (Surveillance Requirement) requires the gross activity to be determined within 4 hours following an increase of greater than 50% (factoring out increases due to changes in thermal power level) in the nominal steady state fission gas release. In the ITS, this frequency has been changed to include an increase equivalent to 50%. This is an inconsequential change that is considered more restrictive since technically it increases the range of releases to be considered.	SR 3.7.5.1	RETS 3.5.a.2 (SR section)
3.7.6, MAIN TURBINE BYPASS SYSTEM			
M1	A new Specification requiring the Main Turbine Bypass System to be Operable has been added. The Specification requires the Main Turbine Bypass System to be Operable or LHGR and MCPR penalties to be applied. This Specification will help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting LHGR and MCPR if the event were to occur during power operation. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.7.6	N/A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M9	Two new 24 month Surveillances have been added. The ITS will require a) a verification that, on an actual or simulated loss of offsite power signal, the emergency bus is de-energized, load shedding occurs, and each EDG subsystem will auto-start from standby condition and properly energize and maintain energized the respective emergency buses/loads; and b) a verification that, on an actual or simulated ECCS initiation signal, each EDG subsystem will auto-start from standby condition and properly operate unloaded, and the emergency buses stay energized from offsite power and the loads properly auto-start.	SR 3.8.1.9, SR 3.8.1.10	N/A
M10	Not used.	N/A	N/A
M11	The CTS requires a demonstration of the ability, under required conditions (loss of power signal, ECCS initiation signal, loss of power signal in conjunction with ECCS signal), of each EDG subsystem to start, accelerate, force parallel and accept emergency loads in the prescribed sequence; however, no specific acceptance criteria is specified. The ITS requires the EDG subsystem meet specific values for time, voltage, frequency and loading duration.	SR 3.9.1.9, SR 3.8.1.10, SR 3.8.1.12	4.9.B.4
M12	A new 7 day Surveillance has been added to verify the offsite circuit breaker alignment and power availability.	SR 3.8.1.1	N/A
M13	The CTS does not specify which EDG fuel oil transfer pumps must be OPERABLE. The ITS will require each diesel generator to have at least one transfer pump capable to transfer oil from its corresponding storage tank to day tank automatically. If this requirement is not met the associated diesel generator must be declared inoperable. In addition, the CTS allows 30 days to restore an inoperable transfer pump. The ITS will require the EDG to be declared inoperable, thus 14 days will be allowed to restore an inoperable pump. In addition CTS 3.9.C.2.c has been deleted since the association between the fuel oil transfer system will now correspond to the associated EDG and not the EDG subsystem.	LCO 3.8.1, SR 3.8.1.6	3.9.C.2.b, 3.9.C.2.c, 4.9.C.2
	3.8.2, AC SOURCES - SHUTDOWN		
(1) M1	The CTS does not specify what the one required offsite power source must be powering. The ITS specifies that offsite AC power sources must be available to supply power to all equipment required to be OPERABLE by ITS LCO 3.8.8. Thus the ITS LCO could require two offsite circuits if both class 1E AC electrical power distribution divisions are required.	LCO 3.8.2.a and b	3.9.D
(1) M2	The CTS does not specify what the one required EDG subsystem must be powering. The ITS specifies that the EDG subsystem must be capable of supplying power to one division of the equipment required to be OPERABLE by ITS LCO 3.8.8.	LCO 3.8.2.~~b~~ c	3.9.D
M3	The ITS adds a new Applicability of during movement of irradiated fuel assemblies in the secondary containment. This condition could include while being in MODE 1, 2, or 3, or when there is no fuel in the vessel.	3.8.2 Applicability	N/A

1. Revision G change

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS allows 7 days total per calendar month to restore an inoperable 125 VDC battery. The ITS only allows 8 hours to restore an inoperable DC electrical power subsystem.	3.8.4 ACTION A	3.9.E.2
M3	The CTS requires a measurement of overall battery voltage; however, no acceptance criteria is provided. The ITS includes float voltage limitations for the 125 VDC and 419 VDC batteries.	SR 3.8.4.1	4.9.E.1, 4.9.F.1
M4	The CTS requires a 125 VDC battery charger performance test; however, no acceptance criteria is provided. The ITS includes the required current, voltage, and time duration of the 125 VDC battery charger performance test.	SR 3.8.4.2	4.9.E.6
M5	Not used.	N/A	N/A
(1) M6	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if the inoperable DC source is not restored within the associated completion time. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.8.4 Required Action B.1	~~3.9.E~~ N/A
	3.8.5, DC SOURCES - SHUTDOWN		
M1	A new Specification is being added requiring one 125 VDC electric power subsystem to be operable and capable of supplying one division of the onsite Class 1E DC Electrical Power Distribution System required by proposed LCO 3.8.8, "Distribution Systems — Shutdown". Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.8.5	N/A
	3.8.6, BATTERY CELL PARAMETERS		
M1	The CTS requires that the reactor shall not be made critical unless both station batteries (including the battery cell parameters) and both LPCI MOV Independent Power Supplies (including the battery cell parameters) are in service, which effectively implies MODES 1 and 2. The ITS requires the battery cell parameters to be within limits when the associated DC electrical power subsystems are required to be Operable. Thus, the 125 VDC battery cell parameters are now required in MODES 1, 2, 3, 4, and 5, and during movement of irradiated fuel assemblies in the secondary containment, and the 419 VDC battery cell parameters are now required in MODES 1, 2, and 3.	3.8.6 Applicability	3.9.E.1, 3.9.F.1
M2	The CTS does not address requirements for a battery cell parameter not within limits. The ITS provides an ACTION for when one or more battery cell parameters are not within Category A or B limits.	3.8.6 ACTION A	N/A

1. This is a new requirement that is not in the CTS. Thus there is no CTS section

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	New requirements concerning the ODCM are added. The ITS specifies that the ODCM will contain radioactive effluent controls and radiological environmental monitoring activities and descriptions of information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release reports. In addition expanded requirements of the ODCM identify monitoring activities and report requirements, and establish content and format for documenting licensee-initiated changes.	5.5.1	N/A
M7	The ITS specifies that the systems covered by the Primary Coolant Sources Outside Containment Program are Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling and Standby Gas Treatment. Currently, the actual systems are not specified.	5.5.2	Facility Operating License 2.C(4)
5.6, REPORTING REQUIREMENTS			
M1	The CTS requires submittal of an Annual Occupational Exposure Tabulation on an annual basis. The ITS requires that an Occupational Radiation Exposure Report be submitted by April 30 of each year. This change adopts a specific date for submittal of a report.	5.6.1	6.9.A.2.a
M2	The CTS requires that the Monthly Operating Report should be submitted by the 15th of each month. The ITS changes the word "should" to "shall."	5.6.4	6.9.A.3
~~M3~~	~~The CTS requires a report of all failures and challenges to safety/relief valves to be submitted annually. In the ITS, this requirement is part of the monthly report, thus the report is required to be filed monthly.~~	~~5.6.4~~	~~6.9.A.2.b~~
5.7, HIGH RADIATION AREA			
NONE	NONE	NONE	NONE
CTS 6.0, ADMINISTRATIVE CONTROLS			
NONE	NONE	NONE	NONE
RETS 2.1, LIQUID EFFLUENT MONITORS			

1. Revision I Change

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

DOC #	SUMMARY	ITS SECTION	CTS SECTION
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM			
NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM			
NONE	NONE	NONE	NONE
RETS 5.0, TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLES			
NONE	NONE	NONE	NONE
RETS 6.1, MONITORING PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.2, LAND USE CENSUS PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM			
NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.3.1 - R1 (5)	Table 3.2-8 and 4.2-8 Instruments 1, 2, 3, 19, 20, and 21, Table 3.2-8 Notes B, C, D, E, and G	The Stack High Range Effluent Monitor, Turbine Building Vent High Range Effluent Monitor, Radwaste Building Vent High Range Effluent Monitor, Safety/Relief Valve Position Indicator, Torus Water Level (narrow range) instrument, and Drywell-Torus Differential Pressure instrument.	TRM	10 CFR 50.59
3.3.3.1 - R2	Tables 3.2-8 and 4.2-8 Instruments 15, 16, 17, 18, Table 3.2-8 Notes A and J	The Residual Heat Removal System Flow, Residual Heat Removal Service Water System Flow, Core Spray System Flow, and Core Spray System Pressure instruments.	TRM	10 CFR 50.59
3.3.3.2, REMOTE SHUTDOWN SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.3.4.1, ATWS-RPT INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.5.1, ECCS INSTRUMENTATION				

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
None - R1	RETS 3.6	Limitations on the Offgas Treatment System.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM				
None - R1	RETS 4.0	Requirements that the Solid Radwaste System shall be used in accordance with the PCP to process wet radioactive wastes.	PCP	10 CFR 50.59
RETS 5.0, TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLE				
None - R1	RETS 5.0	Limitations of the annual doses from all plant sources.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.1, MONITORING PROGRAM				
None - R1	RETS 6.1	The radiological environmental monitoring program requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.2, LAND USE CENSUS PROGRAM				
None - R1	RETS 6.2	The land use census program requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM				