DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
		principle components of the relationship, CFQ, K(Z), and N(Z), are specified in the COLR. ITS LCO 3.2.1 requires that $F_Q(Z)$ meet this same relationship by stating, "$F_Q(Z)$, as approximated by $F_Q^M(Z)$, shall be within the limits specified in the COLR." The equation for the relationship is located in the ITS Bases. This changes the CTS by moving information to the Bases.		Specifications Bases Control Program		
3.2.1 LA.5	4.2.2.2.f	CTS 4.2.2.2.f states that with $F_Q^M(Z)$ not within limit, power operation may continue provided the AFD are reduced 1% AFD for each percent $F_Q(Z)$ exceeded its limits or by complying with the requirements of the specification for $F_Q(Z)$ exceeding its limit by the same percentage. CTS 4.2.2.2 also provides an equation for determining the percent by which $F_Q(Z)$ exceeds its limit. ITS 3.2.1 contains the same requirements described for the CTS, but does not contain an equation for determining the percentage by which $F_Q(Z)$ exceeds the limit. This equation is relocated to the ITS Bases. This changes the CTS by moving information to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3	EDITORIAL
3.2.1 LA.6	4.2.2.2.g	CTS 4.2.2.2.g states that the $F_Q(Z)$ limits are not applicable in the lower core region 0 to 15 percent inclusive, and the upper core region 85 to 100 percent inclusive. ITS 3.2.1 does not contain this information. This information is located in the ITS Bases. This changes the CTS by moving information to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3	
3.2.1 LA.7	3.2.1, Action e.1	CTS 3.2.1, Action e.1, states that $F_Q^M(Z)$ shall be increased by 2% over the measured amount when $F_Q^M(Z)$ / K(Z) (maximum over Z) is increasing. ITS SR 3.2.1.1 Note states that $F_Q^M(Z)$ shall be increased by an appropriate factor when $F_Q^M(Z)$ / K(Z) (maximum over Z) is increasing. This changes the CTS	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3	

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.3.1 A.2	The Functional Units required to be OPERABLE for the Reactor Trip System (RTS) instrumentation are shown in CTS Table 3.3-1. The Table defines each function with specific requirements for Channels, Applicable MODES, and Actions. A Note is added to ITS 3.3.1 Actions, which states, "Separate Condition entry is allowed for each Function." This modifies the CTS by providing a specific allowance to enter each Function separately. This change is acceptable because it clearly states the current requirement. The CTS considers each function to be separate and independent from the other functions. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1 ACTIONS Note	Table 3.3-1
3.3.1 A.3	The Action for CTS LCO 3.3.1.1 states, "As shown in Table 3.3-1." ITS LCO 3.3.1 Action A states, "One or more Functions with one or more channels inoperable, enter the Condition referenced in Table 3.3.1-1 for the channel(s), immediately." This change is acceptable because it maintains the CTS requirements in the ITS format. The CTS and ITS refers to a Table for the requirements on each function. Any change to the functional requirements will be discussed by a specific discussion of change. This change modifies the format of the specifications but not the technical requirements. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1 ACTION A	3.3.1.1 Action

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.4	CTS Surveillance Requirement (SR) 4.3.1.1.1 states that each Reactor Trip System instrumentation channel shall be demonstrated OPERABLE by the performance of specific test requirements. These include a CHANNEL CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST performed for required MODES of operation and the specified frequencies shown in Table 4.3-1. ITS Table 3.3.1-1 includes the surveillance requirement column in addition to the applicable MODES or other specified condition column for each Function. ITS SRs for the CHANNEL CHECK, CHANNEL CALIBRATION, TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT), and CHANNEL OPERATIONAL TEST (COT) are listed by numbers and Frequency in the surveillance requirements section for the specification. This change is acceptable because ITS SRs maintain the CTS requirements for testing of each RTS function. The change is one of format only and any technical change to the requirements for a RTS function is specifically addressed in an individual discussion of change. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1	4.3.1.1.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.5	CTS Table 3.3-1 provides the requirements for each RTS instrumentation function. The table lists "FUNCTIONAL UNIT", "TOTAL NUMBER OF CHANNELS," "CHANNELS TO TRIP," "MINIMUM CHANNELS OPERABLE," "APPLICABLE MODES," and "ACTIONS" columns. CTS Table 4.3–1 lists the surveillance requirements for each RTS function including a column labeled "MODES IN WHICH SURVEILLANCE REQUIRED," that specifies the applicability for each function. ITS Table 3.3.1-1 is constructed from the requirements of the CTS Tables with modifications. ITS Table 3.3.1–1 lists the columns as, "FUNCTION," "APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS," "REQUIRED CHANNELS," "CONDITIONS," "SURVEILLANCE REQUIREMENTS," and "ALLOWABLE VALUE." The elimination of "CHANNELS TO TRIP" and "MINIMUM CHANNELS OPERABLE" columns is addressed in DOC LA.15. This change modifies the CTS Tables by changing the names of columns and deleting the Table 4.3–1 column labeled "MODES IN WHICH SURVEILLANCE REQUIRED." This change is acceptable because it maintains the technical requirements of the CTS with the conversion to the ITS requirements. The "REQUIRED CHANNELS" column incorporates the channel requirements of the instrumentation function provided by the CTS by the "TOTAL NUMBER OF CHANNELS" column in the ITS. The CTS "ACTIONS" become the ITS "CONDITIONS". The "APPLICABLE MODES" column of CTS is changed to the column labeled, "Applicable MODES or other specified conditions" of the ITS. The column in Table 4.3-1 labeled, "MODES IN WHICH SURVEILLANCE REQUIRED," is not required because it is redundant to CTS Table 3.3-1 "APPLICABLE MODE" column. A separate DOC addresses any technical change to Tables 3.3-1 and 4.3-1 requirements if there is a technical difference from the CTS to the ITS. This change is designated as administrative because it does not result in technical changes to the CTS requirements.	Table 3.3.1-1	Table 3.3-1, Table 4.3-1
3.3.1 A.6	CTS 2.2.1 in Table 2.2-1 lists various notes for the Allowable Values associated with the operation of the unit until steam generator replacement or 2-loop operation. The steam generators have been replaced and 2-loop operation has never been licensed. Therefore, these notes do not provide any technical requirements and are eliminated. This change is acceptable because no CTS or ITS RTS function relies upon these notes to ensure proper operation or safety of the plant. With the deletion, no technical requirements of the CTS are changed. This change is designated as administrative because it does not result in technical changes to the CTS.	None	Table 2.2-1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.7	CTS Surveillance Requirement 4.3.1.1.2 states, in part, that the RTS Response Time of each trip function shall be demonstrated to be within its limit at least on per 18 months. The requirement specifies that each test shall include at least one logic train such that both logic trains are tested at least once per 36 months. A column added to CTS Table 4.3-1 addresses each function, and which the RESPONSE TIME testing requirement is applicable. The RESPONSE TIMES requirements reflect the channel requirements contained in the Technical Requirements Manual (TRM) Section 6.2. This does not modify the CTS requirements, but provides clarification. ITS SR 3.3.1.16 requires the verification of RTS RESPONSE TIMES be within limits every 18 months on a STAGGERED TEST BASIS. This change is acceptable because the requirements for RESPONSE TIMES testing for the RTS channels remain unchanged. ITS definition for STAGGERED TEST BASIS and its application in this requirement do not change the current testing frequency requirements. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1.16	4.3.1.1.2, Table 4.3-1
3.3.1 A.8	CTS Table 3.3-1 for the RTS Functions does not list Action 11 to be entered for an inoperable channel. ITS 3.3.1 does not convert the Action to an ITS Condition for any of the required RTS Functions. This changes the CTS by eliminating Action 11. This change is acceptable because no CTS or ITS RTS function relies upon the compensatory measures of Action 11 to ensure proper operation or safety of the plant. With the deletion, no technical requirements of the CTS are changed. This change is designated as administrative because it does not result in technical changes to the CTS.	None	Table 3.3-1, Action 11
3.3.1 A.9	Not used.	N/A	N/A

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.10	CTS Surveillance Requirements (SRs) for the Intermediate Range channels in Table 4.3-1 list a CHANNEL CHECK at a frequency of Q (12) for the MODES 3*, 4*, and 5* applicability. The SRs listed for the Intermediate Range channels with the applicability in MODES 1 and 2 require the performance of a CHANNEL CHECK at a frequency of each shift (S), a CHANNEL CALIBRATION at a refueling frequency (R (6,13)), and a CHANNEL FUNCTIONAL TEST at the frequency of each startup (S/U (1)) and quarterly (Q (12)). CTS Table 3.3-1 requires the Intermediate Range channels to be OPERABLE in MODES 1### and 2. The ### represent "Below the P-10 (Low Setpoint Power Range Neutron Flux Interlock) setpoint" for the applicability. CTS Action 3 must be entered for an inoperable channel. The applicability for Intermediate Range channels is set above the P–6 setpoint in Action 3 Part a. This states, "Below the P-6 setpoint, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 setpoint." ITS 3.3.1 Function 4 Intermediate Range Neutron Flux channels lists the applicability as MODES 1(b) and 2(c) and Conditions F and G must be entered for inoperable channel(s). Note (b) states, "Below the P-10 (Power Range Neutron Flux) interlocks," and Note (c) requires, "Above the P-6 (Intermediate Range Neutron Flux) interlocks." The surveillance requirements for these channels are SRs 3.3.1.1, 3.3.1.8, and 3.3.1.11. The change of the CTS applicability from MODE 2 to MODE 2(c) in DOC L.27. The change in applicability from ### to Note (b) maintains the technical requirement from the CTS to the ITS. This changes the CTS by deleting the Q (12) CHANNEL FUNCTIONAL TEST for MODES 3*, 4*, and 5*. The change in applicability is acceptable because the Intermediate Range is only assumed in the safety analyses to be OPERABLE one decade above the overlap with the Source Ranges channels (P-6 setpoint) up to the overlap with the Power Range channels (P-10 setpoint). This is reflected in the CTS Action for the inoperability of a channel when it requires the unit to remain below P-6 until the inoperable channel is returned to OPERABLE status. The performance of the Surveillance Requirements ensure the Intermediate Range channels are maintained OPERABLE for the specified MODES. The deletion of the CHANNEL FUNCTIONAL TEST for MODES 3*, 4*, and 5* is acceptable because the Intermediate Range channels are not required to be OPERABLE in these MODES. ITS SR 3.3.1.8 must be met when the Intermediate Range channels are required to be OPERABLE. The applicability requirement in the CTS is maintained in the ITS by requiring the function's OPERABILITY below the P-10 setpoint. This change is designated as administrative because it does not result in technical changes to the CTS in the applicability or surveillance requirements.	Table 3.3.1-1	Table 4.3-1, Table 3.3-1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.11	The CHANNEL FUNCTIONAL TEST (CFT) requirements in CTS Table 4.3-1 have been ~~changed~~ translated in ITS Table 3.3.1-1 to the CHANNEL OPERATIONAL TEST (COT), TRIP ACTUATION DEVICE OPERATIONAL TEST (TADOT), or ACTUATION LOGIC TEST (ALT). The individual RTS functions will require a COT or TADOT to be performed with the exception of the trip actuation logic, which requires the ALT. Trip actuation devices (bistable or digital) such as manual switches or RCP breakers require a TADOT to be performed. The analog channels such as Pressurizer Pressure require a COT to be performed. Each SR Frequency is replaced with an ITS SR number that corresponds to the required testing at the current frequency. The technical requirements and frequency of testing for each function will remain unchanged in the ITS requirements, unless noted and addressed by a separate discussion of change. The change is acceptable because the COT, ALT, and TADOT maintain the technical requirements of the CFT and more accurately describe the required testing for each RTS function. The CTS CFT is divided in two parts, one for the analog channels and the other the bistable channels. The COT requirements provide for the parameter monitoring channels and are consistent with the analog requirements. The COT requires the injection of simulated or actual signal into the channel as close as practicable to the sensor to verify OPERABILITY of all devices associated with the channel. This includes adjustments, as necessary, of required alarms, interlocks, and trip setpoints within their necessary range and accuracy. The TADOT is defined in a similar manner for the trip actuation device. The TADOT requirements provide for a digital or bistable channel testing requirements of the CTS CFT requirements. The ALT verifies the OPERABILITY of the logic circuits and its required outputs. This type of testing is required in the CTS requirements by the monthly CFT for the Automatic Trip Logic. This change is designated as administrative because it does not result in technical changes to the CTS surveillance requirements.	Table 3.3.1-1	Table 4.3-1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.12	CTS 3.3.1.1 Actions denoted with a # in Table 3.3-1 state that the provisions of Specification 3.0.4 are not applicable. The ITS does not contain this exception, but provides the same allowance in the requirements of LCO 3.0.4. This change modifies the CTS by eliminating the specific exception to Specification 3.0.4 and utilizing a generic exception described in LCO 3.0.4. This change is acceptable because ITS LCO 3.0.4 states when an LCO is not met, entry into the applicable MODE may be made when the associated Actions permit continued operation for an unlimited period of time. The Actions modified by note # allow continued operation for an unlimited period of time. Therefore, eliminating the specific exceptions to CTS 3.0.4 is appropriate because the allowance is addressed in ITS LCO 3.0.4. This change is designated as administrative because it does not result in technical changes to the CTS. ~~CTS 3.3.1.1 Actions denoted with a # in Table 3.3-1 state that the provisions of Specification 3.0.4 are not applicable. ITS LCO or Surveillance requirements do not require an allowance stated in each Specification, but provides the allowance by the definition specified in ITS Section 3.0. This change modifies the CTS by eliminating the reference to the provisions of Specification 3.0.4 within specifications or surveillance requirements.~~ ~~This change is acceptable because ITS LCO 3.0.4 states when an LCO is not met, entry into the applicable MODE shall not be made except when the associated Actions permit continued operation for an unlimited period of time. Therefore, eliminating the reference to CTS Specification 3.0.4 is appropriate in the ITS Actions because the allowance is addressed in the ITS LCO 3.0.4 definition This change is designated as administrative because it does not result in technical changes to the CTS.~~	None	Table 3.3-1, Action #
3.3.1 A.13	Not used.	N/A	N/A
3.3.1 A.14	CTS surveillance requirement in Table 4.3-1 for the SI input from ESF is stated as M (4). Note (4) states the following "Manual ESF functional input check every 18 months." The monthly requirement is therefore only required to check the input from ESF on an 18 monthly frequency. ITS 3.3.1 for function 17, SI input from ESF, requires SR 3.3.1.14 to be performed. This requirement performs a TADOT every 18 months. A Note modifies the requirement that specifies that verification of setpoint is not required. This change maintains the technical requirements of the CTS in ITS format. This change is acceptable because the current requirement is only performed every 18 months to verify the SI input. No setpoint verification is required with the input from ESF and therefore, the Note modifying the SR does not change the technical intent from the CTS requirement. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1	Table 4.3-1

REV 17

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.15	CTS 3.3.1.1 requirements for Functional Unit 6.C, Source Range Neutron Flux Shutdown, are stated in CTS Table 3.3-1. The total number of Source Range channels is listed as two, and the minimum channels OPERABLE is listed as one. Note 5 does not require any action unless no channels are OPERABLE. This requirement is applicable in MODES 3, 4, and 5 with the RTBs open. ITS 3.3.1 requirement for the Source Range Neutron Flux, Function 5, is stated in ITS Table 3.3.1-1, and lists the number of required channels as one. The Table lists the applicability or other specified conditions as MODES 3(e), 4(e), and 5(e). Note (e) states, "With the Rod Control System incapable of rod withdrawal. In this condition, source range Function does not provide reactor trip but does provide indication." This change maintains the CTS technical requirements for the number of OPERABLE Source Range channels. The addition of Note (e) is addressed in DOC L.29. This change is acceptable because the CTS requirements are maintained with the conversion to the ITS format. The ITS number of required Source Range channels is one, which is the same as the CTS requirement. This change is designated as administrative because it does not result in technical changes to the CTS. ~~CTS 3.3.1.1 requirements for Functional Unit 6.C, Source Range Neutron Flux Shutdown, are stated in CTS Table 3.3-1. This requires Action 5 to be entered for an inoperable required Source Range channel. This requirement is applicable in MODES 3, 4, and 5 with the RTBs open. Action 5 states that with the number of OPERABLE channels one less than the required by the minimum channels OPERABLE, the SHUTDOWN MARGIN is verified for compliance, in accordance with CTS Specifications 3.1.1.1 or 3.1.1.2, and performed within 1 hour and every 12 hours thereafter. The total number of Source Range channels is listed as two, and the minimum channels OPERABLE is listed as one. ITS 3.3.1 requirement for the Source Range Neutron Flux, Function 5, is stated in ITS Table 3.3.1-1, and lists the number of required channels as one. The Table lists the applicability or other specified conditions as MODES 3(e), 4(e), and 5(e) with the RTBs open, and Condition K must be entered for a required inoperable Source Range channel. Note (e) states, "With the Rod Control System incapable of rod withdrawal. In this condition, source range Function does not provide reactor trip but does provide indication." This change maintains the CTS technical requirements for the Source Range requirement for a shutdown condition with the RTBs open.~~ ~~This change is acceptable because the CTS requirements are maintained with the conversion to the ITS format. The ITS number of required Source Range channels is one, which is the same as the CTS requirement of, "one less than the required by the minimum channels OPERABLE requirement." This change is designated as administrative because it does not result in technical changes to the CTS.~~	Table 3.3.1-1	Table 3.3-1

REV 17

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.16	CTS functions for the RTS Interlocks in Table 3.3.-1 require Action 17 to be entered for an inoperable channel. Action 17 states with less than the Minimum Channels OPERABLE, within one hour verify that the interlocks are in the required state for plant conditions, or apply Specification 3.0.3. ITS function 18, the RTS interlocks list Conditions Q and R to be entered for an inoperable channel. Required Action Q.2 requires the unit to be placed in MODE 3 within 7 hours. Required Action R.2 requires the unit to be placed in MODE 2 within 7 hours. This changes the CTS from the LCO 3.0.3 statement to specific required actions to be performed. This change is acceptable because the ITS Required Actions place the unit in a condition within the time allowed by CTS LCO 3.0.3 for each of the functional interlocks. Function P-6 and P-10 are required to be OPERABLE in MODE 2 therefore the required action places the unit into MODE 3 within 7 hours. Functions P-7, P-8, and P-13 are required to be OPERABLE in MODE 1, therefore the required action requires the unit to be placed in MODE 2 with 7 hours. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1	Table 3.3.-1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.17	CTS Action 7 is required to be performed when the Overtemperature, Overpower, Pressurizer Pressure – High, Steam Generator (SG) Water Level – Low Low, and Steam/Feed Flow Mismatch and Low SG Water Level functions have a required channel become inoperable. Each of the functions is required to be OPERABLE in MODES 1 and 2. Action 7 states that the inoperable channel must be placed in trip within 72 hours, and if this is not satisfied, the unit must be placed in HOT STANDBY in 6 hours, HOT SHUTDOWN within the next 6 hours and COLD SHUTDOWN in the following 30 hours. ITS 3.3.1 for the Overtemperature, Overpower, Pressurizer Pressure – High, Steam Generator (SG) Water Level – Low Low, and SG Water Level Low coincident with Steam Flow /Feed Flow Mismatch requires each function to be OPERABLE in MODES 1 and 2 and requires Condition E to be entered for an inoperable channel. Condition E states with one inoperable channel, place the channel in trip within 72 hours or be in MODE 3 within 78 hours. This changes the CTS by elimination the requirement to place the unit in HOT SHUTDOWN or COLD SHUTDOWN. The purpose of this change is appropriately direct the unit to a MODE of operation in which the functions are no longer required by the safety analysis to perform their safety function. This change is acceptable because the Condition's Required Actions direct the unit to be placed in an operating mode which the safety functions are no longer assumed by the safety analyses to provide protection. Each function is only required to be OPERABLE in MODES 1 and 2, therefore, upon entry into HOT STANDBY (MODE 3) each function is no longer required to be OPERABLE. Therefore, eliminating the requirement for the unit to be placed in HOT SHUTDOWN or COLD SHUTDOWN is not required or justified since each function is not required to perform its safety function in MODES 4 or 5. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1	Table 3.3-1 Action 7

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.18	CTS 3.3.1.1 Functional Unit 21B, Reactor Trip Bypass Breakers, states two channels are required to be OPERABLE in the applicable MODES, as indicated by a Note *** and Action 13 is required to be entered, if a channel is inoperable. Note *** states, "With the Reactor Trip Breaker open for surveillance testing in accordance with Specification Table 4.3-1 (item 21A)." CTS Action 13 states that with an inoperable bypass breaker, the breaker must be restored to OPERABLE status within one hour, or the testing of the RTB must be terminated and the bypass breaker opened. CTS Action 1 for the RTB requirements (item 21 A) for an inoperable channel states, "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirements be in HOT STANDBY within 6 hours." ITS Function 19 states two trains for the Reactor Trip Breakers (h) are required to be OPERABLE in MODES 1 and 2. Note (h) states, "Includes any reactor trip bypass breakers that are racked in and closed for bypassing an RTB." Condition P is required to be entered for an inoperable RTB train. ITS Required Action P.1 states, "Restore train to OPERABLE status," within one hour. The change to CTS Action 1, with the addition of ITS Required Action P.1, is addressed by DOC L.13. Required Action P.2 states, "OR Be in MODE 3," within 7 hours. This changes the CTS by including the requirement for the bypass breakers into the function for the RTB train and maintains the allowed outage time for an inoperable breaker. This change is acceptable because including the bypass breaker into the ITS requirement for the RTBs does not change the technical requirements for the bypass breaker. In the CTS and ITS requirements if the bypass breaker becomes inoperable, that breaker must restored to OPERABLE status within one hour if it is relied upon as a substitute for the RTB. If the bypass breaker cannot be returned to OPERABLE the testing or maintenance of the RTB must be immediately suspended and the bypass breaker must be placed in the open position. In this condition with the RTB inoperable, the unit is required to be in MODE 3 in the next 6 hours. This CTS time allowance is maintained in the ITS. The RTB bypass breaker, in the ITS, is tested prior to replacing the RTB, therefore, it is unlikely, that the RTB bypass will become inoperable while being substituted for the RTB. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1, ACTION P	Table 3.3-1 Action 1
3.3.1 A.19	Not used.	N/A	N/A

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.20	The requirements in CTS Table 3.3-1 for the Reactor Trip System interlocks list the designated functions as P-7, P-10, and P-13. These interlocks are required to be OPERABLE from the surveillance requirement 4.3.1.1.2, associated with CTS ITS 3.3.1.1. The P-10 and P-13 interlocks are required to provide a signal at a specific indicated power level, from either the neutron detectors (P-10-Power Range Neutron Flux channels), or power indication of the main turbine (P-13-turbine impulse chamber pressure). The P-10 and P-13 function are required to actuate at a specific setpoint with a tolerance up to the allowable value. The P-7 interlock is derived from P-10 and P-13 functions and is a logic function only. ITS 3.3.1, Table 3.3.1-1, list the Reactor Trip System Interlocks as Function 18, and the P-7 function is Function 18d. Function 18d and 18e represent the P-10 and P-13 interlocks. P-10 and P-13 functions are required to actuate and provide its specific interlocks at a specific setpoint with an allowance up to an allowed value. The P-7 Function is not a channel related interlock, but functions on a train related basis. The channel requirements for P-7 are stated as, "1 per train." Because the P-7 interlock is a logic function, there is no setpoint or allowable value limit associated with the function. This change is acceptable because all technical requirements of the CTS are reflected in the ITS requirements. The requirements of ITS 3.3.1 Function 18 b for P-7 has not been modified the CTS requirements, except only in format. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1	Table 3.3-1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.21	CTS requirements for the Power Range Instrumentation channels are listed in Table 3.3-1. This states four total channels are required in MODES 1 and 2 and Action 2# must be entered for an inoperable channel. The Limiting Safety System Settings listed in CTS Table 2.2-1 specifies for the Power Range Neutron Flux two trip setpoints and allowable values. These are divided into Low and High values. The P-10 interlock in CTS Table 3.3-1 describes the requirements for enabling the Power Range Neutron Flux Low setpoint trip below the specified values. The ITS in Table 3.3.1-1 states the Power Range Neutron Flux channels, functions 2a and 2b, are to be OPERABLE in two states, High and Low Neutron Flux, with four channels required to be OPERABLE. The functions are applicable in MODES 1 and 2 for the High and MODES 1(b) and 2 for the Low. For the Power Range Low function Action E is required to be entered. Action E requires the channel to be placed in trip within 72 hours or be in MODE 3 within the next 6 hours. Note (b) states, "Below the P-10 (Power Range Neutron Flux) setpoint. This change maintains the technical requirements of the CTS as they are translated to the ITS format. This change is acceptable because all technical requirements of the CTS are maintained by the conversion to the ITS. The ITS presentation of the CTS requirements only modifies the format and does not add or delete any technical requirements. The Power Range functions continue to require four channels to be OPERABLE in MODES 1 and 2, with the trip setpoints for High and Low Neutron Flux values required above and below the P-10 interlock. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1, 3.3.1 ACTION E	Table 3.3-1, Table 2.2-1
3.3.1 A.22	CTS Table 3.3-1 Functions 18.a (Low Auto Stop Oil Pressure) and 18.b (Turbine Stop Valve Closure) requires the functions to be OPERABLE in MODE 1 and Action 9 to be entered for an inoperable channel. Action 9 requires an inoperable channel be placed in trip within 72 hours or reduce power to less than P-8 setpoint within the next 4 hours. ITS Table 3.3.1-1 Function 16 Turbine Trip with Low Auto Stop Oil Pressure (16a) and Turbine Stop Valve Closure (16b) lists the applicable MODES as MODE 1(g). Note (g) states, "Above the P-8 (Power Range Neutron Flux) interlock." The Table lists Condition N to be entered for an inoperable channel. Condition N states, "One Turbine Trip channel inoperable place the channel in trip," within 72 hours, or "Reduces power < P-8," within 76 hours. A Note modifies Condition N that states, " The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels." The addition of this Note is addressed by DOC L.26. This changes the format of the CTS while maintaining the technical requirements. This change is acceptable because the technical requirements of the CTS for the required trips from the Turbine Trips are maintained in the ITS. Any technical changes are address in other discussion of changes in this section. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 Note g, ACTION N Note	Table 3.3-1 Action 9

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.23	CTS 3.3.1.1 for Functional Units 19, 21, and 22 lists the test requirements for the Safety Injection (SI) input to Engineered Safety Features (ESF), Reactor Trip Breakers (RTBs), and Automatic Trip Logic. Each of these functions must be tested monthly. This Frequency is modified by Note (5), which states, "Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS (STB)." ITS notation for STB utilizes a definition that states the frequency as 31 days on a STB for the RTBs, Function 19, and the Automatic Trip Logic, Function 21. This change maintains the required testing frequency for each required safety function. This change is acceptable because the testing of the functions will continued to be required at the same frequency. The CTS definition for STB requires all trains or channels to be tested within the allowed time stated by the Frequency. ITS definition for STB states that the Frequency listed is the time for one train or channel to be tested. Under the CTS Frequency for the listed functions, two trains must complete the required testing in 62 days. The ITS Frequency requirement for each of these functions requires a train to be tested every 31 days with both trains completed in 62 days. Therefore, the testing requirements in the CTS and ITS require the same frequency for each function. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.3.1.4 SR 3.3.1.5	Table 3.3-1 Note (5)
3.3.1 A.24	Not used.	N/A	N/A

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.25	CTS Table 4.3-1 Function 18, Turbine Trip, specifies a CHANNEL FUNCTIONAL TEST with a frequency of S/U (1). The S/U stands for prior to a reactor startup and Note (1) specifies "If not performed within the previous 31 days." Action 9 must be entered for an inoperable channel. Action 9 states, "With the number of channels OPERABLE less than the Total Number of Channels OPERABLE requirement, STARTUP and POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 72 hours and the Minimum Channels OPERABLE Requirement is met or reduce power to less than the P–8 setpoint in the next 4 hours." ITS Table 3.3.1–1 Function 16 Turbine Trip requires SR 3.3.1.15, a TADOT, to be performed. The Frequency for the SR states, "prior to exceeding the P-8 interlock whenever the unit has been in MODE 3, if not performed within the previous 31 days." A Note to the SR states, "Verification of setpoint is not required." This changes the CTS surveillance requirement frequency from startup, if not performed in the previous 31 days, to prior to exceeding P-8 setpoint whenever the unit has been in MODE 3, if not performed in the previous 31 days and specifically states that verification of the setpoint is not required. This change is acceptable because the frequency of the required test continues to be performed in the same time period as required by the CTS. The ITS Frequency is set to be consistent with the MODE of applicability for the Turbine Trip function. The intent of the CHANNEL FUNCTIONAL TEST in the CTS is to ensure that the turbine trip signal would generate a reactor trip signal. The CTS requirement for a CFT is satisfied by a turbine trip below the setpoint of P – 8. This test produces lit annunciators in the main control room that signifies that the turbine trip would occur. This test corresponds to the ITS requirement of a Trip Actuation Device Operational Test (TADOT) without a setpoint verification which verifies that a turbine trip would occur. The ITS TADOT satisfies the technical requirements of the CTS CFT. Therefore, the addition of the ITS Note stating that no verification of setpoint is required is not a change in the requirement, but is provided for clarification. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.3.1.15	Table 4.3-1 Note (1)

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	
3.3.1 A.26	CTS Table 3.3-1 Action 1 states with the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement the unit must be shutdown within a given time. Additionally, Action 1 states that one channel may be bypassed for up to 4 hours for concurrent surveillance testing of the RTB and automatic trip logic provided the other channel is OPERABLE. Action 1 applies to Function 21 Reactor Trip Breakers. ITS Table 3.3.1 –1 for function 19 requires Condition P to be entered for an inoperable train. Condition P requires with one RTB train inoperable, it must be restored to OPERABLE status or the unit must be shutdown. Three Notes modify Condition P. Note 3 states that one RTB train may be bypassed for up to 4 hours for concurrent surveillance testing of the RTB and automatic trip logic, provided the other channel is OPERABLE. This changes the CTS by placing the allowance of concurrent surveillance testing from ACTION 1 into a Condition~~Note~~ in the ITS format. This change is acceptable because the allowance of the CTS is maintained in the ITS format. Four hours of concurrent surveillance testing of the RTB and automatic trip logic are allowed in the CTS requirements. The CTS allowance is justified by WCAP-14333 P-A. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.1 ACTION P Note 3	Table 3.3-1 Action 1	EDITORIAL BY NRC
3.3.1 A.27	CTS Table 3.3-1 Function 20 RCP Breaker Position provides for a reactor trip. The total number of channels is one per (RCP) breaker and for an inoperable channel Action 8 must to be entered and requires the inoperable channel to be placed into trip within 72 hours or the unit is required to be placed below P-7 interlock within 78 hours. ITS 3.3.1 for RCP Breaker Position specifies the required channels is one per RCP (breaker) and requires Condition M for an inoperable channel. The Condition provides for an inoperable channel that the channel must be returned to OPERABLE status within 72 hours or power must be reduced below P-7 setpoint within 78 hours. This changes the CTS by stating the channel requirement for RCP breaker position as one per RCP. The purpose of this change is to provide consistent requirements for the functions as assumed in the safety analyses assumptions. This change is acceptable because the required Reactor Trip function is specified to be OPERABLE in the applicable MODE with consistent required actions. The Condition is consistent with appropriate Required Action to place the unit out of the MODE of applicability within Completion Times consistent with other measures that shutdown the unit. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.1 ACTION M	Table 3.3-1	REV 12

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.28	CTS Table 4.3-1 lists the surveillance requirements for the Power Range Neutron Flux CHANNEL CALIBRATION as M (3)(6). Note (3) states, "Compare incore to excore axial offset above 15 % RATED THERMAL POWER (RTP). Adjust channel if absolute difference ≥ 3 percent." The CTS does not specify a CHANNEL CALIBRATION for the Overtemperature (OT)ΔT function. ITS Table 3.3.1–1 specifies SR 3.3.1.3 for PRNF and OTΔT functions. SR 3.3.1.3 states, " Compare results of the incore detector measurements to NIS AFD," every 31 effective full power days (EFPD). Two Notes modify the SR. Note 1 states, "Adjust NIS channel if absolute difference is ≥ 3 %." Note 2 states, "Not required to be performed until 72 hours after THERMAL POWER is ≥ 15 % RTP." The addition of Note 2 is addressed by DOC L.9. The change from monthly to every 31 EFPD is addressed by DOC L.16. This changes the CTS by applying the requirement of a monthly comparison of axial offset of the NIS channel to both the PRNF and OTΔT functions. The purpose of CTS monthly CHANNEL CALIBRATION for the PRNF channels is to ensure the indicated ΔI signal from the Power Range channels for the OTΔT channels are within 3% of the actual ΔI. This change is acceptable because the technical requirements of the CTS are translated into the appropriate ITS requirements. The monthly calibration of the PRNF channels is to ensure the PRNF properly reflect AFD indications and OTΔT channels receive appropriate adjustments to change their setpoints for changing plant conditions of ΔI. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.3.1.3 NOTE 1	Table 4.3-1 Note (3)

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.29	CTS Table 4.3-1 lists for the Power Range Low Setpoint and Intermediate Range channels a quarterly test to be performed (Q (12)). Note (12) states, "Quarterly Surveillance in MODE 3*, 4*, and 5* shall also include verification that Permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window." ITS SR 3.3.1.8 for the Source, Intermediate, and Power Range Neutron Flux Low Setpoint channels require a CHANNEL OPERATIONAL TEST (COT) to be performed every 92 days. A Note modifies the SR that states, "This Surveillance shall include verification that interlocks P-6 and P-10 are in their required state for existing unit conditions." The movement of the phrase, "by observation of the permissive annunciator window," is addressed by DOC LA.6. The deletion of quarterly surveillance in MODES 3*, 4*, and 5* is addressed by DOC L.10. This changes the CTS by reformatting the requirement to the ITS SR 3.3.1.8 Note. The purpose of ITS SR 3.3.1.8 Note is to ensure the interlocks P-6 and P-10 are in the proper state for the indicated power level from the appropriate NIS channels. This change is acceptable because the technical requirements of the CTS are maintained in ITS format. The CTS and ITS require the verification of P-6 and P-10 interlocks are in the required state for existing plant conditions. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.3.1.8 Note	Table 4.3-1 Note (12)
3.3.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.3.2 A.2	CTS Actions a and b for LCO 3.3.2.1 require the applicable Action requirements of Table 3.3-3 be entered for an inoperable channel until the required channel is restored to OPERABLE status. ITS LCO 3.3.2 Action A states for an ESFAS function with one or more required channels or trains inoperable, the referenced Condition in Table 3.3.2-1 for the channel(s) or train(s) be entered immediately. The Actions of the ITS are modified by a Note which states, "Separate Condition entry is allowed for each Function." This change is acceptable because the Note provides a clarification for the current requirements and does not modify the technical requirements of the CTS LCO's Actions. The proposed Note clarifies the CTS for this requirement without any technical change. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	3.3.2 ACTIONS NOTE	3.3.2.1 Actions a and b

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.3	CTS Surveillance Requirement 4.3.2.1.1 states that each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of specific test requirements. This includes a CHANNEL FUNCTIONAL TEST (CFT) shown in Table 4.3-2. ITS Table 3.3.2-1 includes the SRs in a column for each Function. The ITS SRs for the TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT), ACTUATION LOGIC TEST (ALT), MASTER RELAY TEST (MRT), and CHANNEL OPERATIONAL TEST (COT) are listed by numbers in the Surveillance Requirements section for the specification. This change is acceptable because the ITS SRs maintain the CTS requirements for testing of each Function. The change is one of format only and any technical change to the requirements for a Function is specifically addressed in an individual discussion of change. The CTS CFT is divided into several parts in the ITS requirements, and becomes the COT for analog devices, i.e., pressure or temperature channels, and the TADOT for on/off channels, i.e., manual switches for SI, Containment Spray, and etc. For the logic testing requirements, the ALT and MRT are the appropriate test designations. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	4.3.2.1.1
3.3.2 A.4	CTS Functional Units 1.f and 4.d of Table 3.3-3 specifies, "Steam Flow in Two Steam Lines – High Coincident with either Tave – Low Low or Steam Line Pressure – Low," for Safety Injection (SI) and Steam Line Isolation (SLI) are required to be OPERABLE in MODES 1, 2, 3##. The notation ## states, "Trip function may be blocked in this MODE below the P-12 setpoint." ITS Table 3.3.2-1 requires the High Steam Flow in Two Steam Lines Coincident with Tave – Low Low function for SI and SLI to be OPERABLE in MODES 1, 2 and 3. MODES 2 and 3 are modified by Note (b) that states, "Above the P-12 (Tave-Low Low) interlock." This changes the CTS by providing a clarification for the functional requirements. This change is acceptable because the ITS requirement states the applicability in the terms of when the function is required to be OPERABLE. CTS stated the requirement in terms of an exception and did not state the specific applicability requirements. The change is designated as administrative change because it does not result in technical changes to the CTS requirements.	3.3.2-1 Note (b)	Table 3.3-3, Note ##

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.5	CTS Table 3.3-3 provides the requirements for the ESFAS instrumentation functions. The table's columns list the name of the function, total number of channels, channels to trip, minimum number of OPERABLE channels, applicable MODES, and associated Actions. ITS Table 3.3.2-1 is constructed from the requirements of CTS Table, but with modifications. The ITS Table requirements list the name of the function, applicable MODES or other specified Conditions, required channels, Conditions, Surveillance Requirements, and Allowable Values. The "Channels to Trip" and "Minimum Channels OPERABLE" columns are addressed by DOC LA.12. A separate DOC addresses any technical change to the CTS Table 3.3-3. This changes the CTS Table by requiring different formatted information in the ITS. This change is acceptable because it maintains the technical requirements of the CTS with the conversion to the ITS. The required channels' column units incorporates the channel requirements of the instrumentation function formerly provided by the CTS column of total number of channels. This requires a function, with the reactor being operated in specific MODES or specific conditions, to have a number of channels OPERABLE. If the number of OPERABLE channels is less than the required, the ITS Condition (formally the CTS Action) must be entered. The addition of specific conditions in the ITS that were in the CTS are made with notes, which specify modifications to Actions or applicability for a function. With these modifications to the table, it is the intent of this change to not modify any technical requirement, but rather to present the information in a more logical manner. Any technical change to a function is addressed by a separate item DOC. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	Table 3.3-3
3.3.2 A.6	CTS Table 3.3-3 for Functional Unit 3, Containment Isolation Phase 'A', states the function is initiated from safety injection automatic actuation logic, in addition to manual initiation. ITS requirement in Table 3.3.2-1 states manual, automatic actuation logic and actuation relays, and the safety injection signals provide the Containment Isolation Phase A initiation signal. This rewords the requirement and provides a clarification for the CTS. This change is acceptable because the CTS requirements are maintained in ITS format. The Containment Phase A Isolation is initiated by the automatic actuation logic and actuation relays and the safety injection signals. The presentation of the requirements in ITS format does not modify the technical requirement of the CTS. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	Table 3.3-3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	
3.3.2 A.7	CTS requirements for LCO 3.3.2.1 in Table 3.3-3 associated with Functions require various Actions marked with * to be entered when a channel becomes inoperable for the functions. The notation * for the Action states, "The provisions of Specification 3.0.4 are not applicable." This allowance is not needed to be specifically stated for these functions in the ITS format and is eliminated. This change is acceptable because ITS LCO 3.0.4 states 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. The Required Actions of ITS LCO 3.3.2 for the ESFAS Functions conform to this requirement, and therefore the allowance is provided in the ITS without requiring a specific exception. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	None	Table 3.3-3	REV 17
3.3.2 A.8	CTS Table 4.3-2 lists in the last column the MODES in which the associated Surveillance Requirements must be performed. CTS Tables 3.3-3 and 4.3-2 are combined to form ITS Table 3.3.2-1. With the combining of these Tables, the 'MODES in which surveillance required' column of 4.3-2 is redundant to the requirements listed for the functions in Table 3.3-3 'Applicable MODES' column and is labeled ~~eliminated. ITS Table 3.3.2-1 labels this column~~ as, 'Applicable MODES or other specified conditions' in ITS Table 3.3.2-1. This change is acceptable because the technical requirements for each listed function is maintained with the conversion of the CTS to the ITS requirements. Any changes to the CTS Applicable MODES would apply to the Surveillance Requirements, and would be discussed in a separate discussion of change The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	Table 4.3-2	EDITORIAL BY NRC

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.9	CTS Surveillance Requirement 4.3.2.1.2 requires the ENGINEERED SAFETY FEATURES RESPONSE TIME test on each ESFAS function be performed at least once per 18 months. The requirement states, "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that both logic trains are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3." ITS SR 3.3.2.9 requires the verification that ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS. The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS.~~." ITS SR 3.3.2.9 redefines STB and requires the verification of ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS (STB) without changing the CTS testing intervals~~. This change is acceptable the requirements for ESFAS RESPONSE TIME testing for the ESFAS channels remain unchanged. ITS definition for STAGGERED TEST BASIS and its application in this requirement do not change the current testing frequency requirements.~~because the testing requirements of the CTS are maintained in the ITS format. The testing of every 18 months on a STB satisfies the requirement that both trains are tested every 36 months.~~ The change is designated as administrative change because it does not result in technical change to the CTS requirements.	SR 3.3.2.9	4.3.2.1.2
3.3.2 A.10	CTS ESFAS system interlocks P-11 and P-12 are required to be OPERABLE in MODES 1, 2, and 3. If a channel becomes inoperable, Action 22 must be entered. The Action requires with less that the Minimum Channels within 1 hour determine, "that the interlock is in its required state for the existing plant condition or apply Specification 3.0.3." ITS requirements for the ESFAS interlocks P-11 and P-12 require the functions to be OPERABLE in MODES 1, 2, and 3. If a channel becomes inoperable Action J must be entered. The Action requires a verification of the interlocks are in their required state for plant conditions within 1 hour or be in MODE 3 within 7 hours and MODE 4 within 13 hours. This changes the CTS by specifically stating shutdown requirements in specified time requirements in the Action. This change is acceptable because the Required Actions and Completion Times are the same as the CTS requirements. CTS LCO 3.0.3 allows 1 hour and 6 additional hours to reach HOT STANDBY and 6 more hours to reach HOT SHUTDOWN. This change maintains the technical requirements of the CTS in the ITS format. The change is designated as administrative because the technical requirements remain unchanged.	3.3.2 ACTION J	Table 3.3-3 Action 22

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.11	CTS Functional Unit 1.d of Table 3.3-3 specifies Pressurizer Pressure – Low-Low shall be OPERABLE in MODES 1, 2, 3#. The notation # states the function may be blocked in MODE 3 below P-11 setpoint. ITS Table 3.3.2-1 requires Pressurizer Pressure – Low Low function to be OPERABLE in MODES 1, 2, and 3(a). Note (a) states, "Above the P-11 setpoint." This changes the CTS by providing a clarification for the functional requirements. This change is acceptable because the ITS requirement states the applicability in the terms of when the function is required to be OPERABLE. CTS stated the requirement in terms of an exception and did not state the specific applicability requirements. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1 Note (a)	Table 3.3-3 Note #
3.3.2 A.12	CTS Table 4.3-2 notation (1) is associated with the manual initiation switches for Safety Injection, Containment Spray, Containment Isolation (Phase A and B), Steam Line Isolation, and the start of the AFW pumps. The notation requires that each manual actuation switch be tested to actuate the required function at least once per 18 months during shutdown. In ITS Table 3.3.2-1, for each of the listed functions, SR 3.3.2.7 states that a TADOT must be performed at a frequency of eighteen months. A Note to SR 3.3.2.7 specifies, "Verification of setpoint not required for manual initiation functions." The deletion of the performance of the surveillance requirement during shutdown is addressed by DOC L.4. This changes the CTS by replacing the wording of testing each required switch with the ITS requirement of performing a TADOT for the required functions and adds the Note to not require verification of setpoint. This change is acceptable because the required testing maintains the CTS requirements in the ITS format. The CHANNEL FUNCTIONAL TESTING of the manual switches to perform their function continues to be required in the ITS TADOT. The addition of the Note to the SR simply states that setpoints for manual activation do not require the verification of setpoints. A manual activation either provides a function or not. If the function is initiated by the manual actuation, the function is satisfied, and therefore, the setpoint verification is not necessary for any manual initiation. The change is designated as an administrative change because it does not result in technical change to the CTS requirements.	SR 3.3.2.7 NOTE	Table 4.3-2 notation (1)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.13	CTS Table 4.3-2 lists the requirements for the ESFAS Interlocks P-11 and P-12. A CHANNEL FUNCTIONAL TEST (CFT) and a CHANNEL CALIBRATION must be performed for each interlock on a refueling frequency (R). ITS SRs for the P-11 and P-12 interlocks require SR 3.3.2.8 (CHANNEL CALIBRATION) to be performed every 18 months. This changes the CTS by eliminating the CHANNEL FUNCTIONAL TEST requirements. This change is acceptable because the ITS requirements maintains the CTS technical requirements. The CHANNEL CALIBRATION requirements contain all the requirements of the CFT and therefore, performing a CHANNEL CALIBRATION will satisfy all of the technical requirements of the CFT. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	SR 3.3.2.8	Table 4.3-2
3.3.2 A.14	CTS requirements in Table 3.3–3 for ESFAS Function 3.b.1), Containment Isolation Phase B manual, state that 2 sets, 2 switches/set are the total number of channels required. This function is required to be OPERABLE in MODES 1, 2, 3, and 4 with Action 18 to be entered for an inoperable channel. ITS in Table 3.3.2-1 Function 3.b.1, Containment Isolation Phase B on Manual Initiation, states, "Refer to Function 2.a (Containment Spray – Manual Initiation) for all functions and requirements." This changes the CTS by deleting the specific requirements for the Containment Isolation Phase B manual requirements and referring the function to the Containment Spray Manual Initiation for the specific requirements. This change is acceptable because there are no separate switches to initiate the Phase B Containment Isolation function. The Containment Spray manual switches are the only switches that initiate the Phase B Containment Isolation signal. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	Table 3.3–3

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.15	CTS requirements in Table 3.3-3 for ESFAS Function 3.b.3, Containment Isolation Phase B Containment Pressure High-High state that 4 channels are required. The function is required to be OPERABLE in MODES 1,2,3, and 4 with Action 16* to be entered for an inoperable channel. CTS requirements in Table 3.3-3 for ESFAS Function 2.c, Containment Spray on Containment Pressure High-High state that 4 channels are required. The function is required to be OPERABLE in MODES 1,2,3, and 4 with Action 16* to be entered for an inoperable channel. ITS in Table 3.3.2-1 Function 3.b.3, Containment Isolation Phase B on Containment Pressure High High, states, "Refer to Function 2.c (Containment Spray – Containment Pressure High High) for all functions and requirements." This changes the CTS by deleting the specific requirements for the Containment Isolation Phase B on Containment Pressure High High requirements and referring the function to the Containment Spray Containment Pressure High High for the specific requirements. This change is acceptable because there are no separate signal from Containment Pressure channels to initiate the Phase B Containment Isolation function. The Containment Spray Containment Pressure High High signal is the same signal that initiates the Phase B Containment Isolation signal. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	Table 3.3.2-1	Table 3.3-3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.16	CTS Surveillance Requirement 4.3.2.1.2 states that the Engineered Safety Feature Response Time of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Under the CTS, it is recognized that a Response Time Test is not required for the manual initiation and automatic actuation logic portions of the ESFAS functions. These portions of the function are tested by other Surveillances. ITS 3.3.2 replaces the general statement in CTS 4.3.2.1.2 with specific testing requirements for each function. For those portions of the ESFAS functions that a Response Time Test is appropriate, ITS SR 3.3.2.9 is required. This changes the CTS by explicitly recognizing those portions of ESFAS functions for which a Response Time Test is not required. This change is acceptable because it explicitly states the portions of ESFAS functions for which a Response Time Test is required. The ITS and CTS Response Time Testing requirements are the same. The change is designated as administrative because it does not result in technical change to the CTS requirements.~~CTS Surveillance Requirement 4.3.2.1.2 requires the Engineered Safety Feature Response Time to be conducted for each ESFAS function. The testing must demonstrate that each function is within its specified limit at a frequency of every 18 months. ITS ESFAS SI, Containment Spray, Containment Isolation, Steam Line Isolation, AFW, and ESFAS Interlock Functions for manual initiation and Automatic Actuation Logic and Actuation Relays do not require that Response Time Testing (RTT) be performed. The Automatic Actuation Logic and Actuation Relays require Actuation Logic Test (SR 3.3.2.2), Master Relay Test (SR 3.3.2.3), and Slave Relay Test (SR 3.3.2.5). Each manual initiation function requires a TADOT (SR 3.3.2.7). The ESFAS P-11 and P-12 interlocks require a CHANNEL CHECK and a CHANNEL CALIBRION requirement. The P-4 interlock requires the TADOT. This changes the CTS requirements by not requiring RTT to be performed on the above ESFAS Functions.~~ ~~The purpose of deleting the RTT for these ESFAS Functions is to set the proper testing requirements for functions. The ITS test requirements are the appropriate testing requirements for these ESFAS Functions. The test requirements of the CTS are the same as the ITS test requirements for RTT. The change is designated as an administrative change because it does not result in technical change to the CTS requirements.~~	None	4.3.2.1.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	
3.3.2 A.17	~~CTS Table 3.3-3 for Functional Units 5.a and 5.b, Turbine Trip and Feedwater Isolation on Steam Generator (SG) Water Level – High-High and Automatic Actuation Logic and Actuation Relays, requires for each an applicability of MODES 1, 2, and 3###. Notation ### states, "Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve." ITS Table 3.3.2 – 1 for Function 5, Turbine Trip and Feedwater Isolation, requires that Functions 5.a and 5.b, Automatic Actuation Logic and Actuation Relays and SG Water Level – High High, be OPERABLE in MODES 1, 2(e), and 3(e). Note (e) states, "Except when all Main Feedwater pump discharge valves or all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve." The Main Feedwater pump discharge valves addition is addressed by DOC L.6. This changes rewords the CTS by specifically stating the Functions 5.a and The purpose of the CTS and ITS Notes are to provide an exception to the instrumentation requirements for the Feedwater Isolation function. This change is acceptable because the technical requirements of the CTS are maintained in the ITS format. Both CTS and ITS do not require instrumentation channels to be OPERABLE (i.e., not applicable) when the required equipment is in a state that performs the safety function. The change is designated as administrative change because it does not result in technical change to the CTS requirements.5.b are not applicable in MODE 2 when appropriate valves are closed and provide the required safety function. The purpose of the CTS and ITS Notes are to provide an exception to the instrumentation requirements for the Feedwater Isolation function. This change is acceptable because the technical requirements of the CTS are maintained in the ITS format. Both CTS and ITS do not require instrumentation channels to be OPERABLE (i.e., not applicable) when the required equipment is in a state that performs the safety function. The change is designated as administrative change because it does not result in technical change to the CTS requirements.~~Not Used	~~Table 3.3.2-1 NOTE (e)~~	~~Table 3.3-3 NOTE ###~~	REV 16
3.3.2 A.18	CTS Table 3.3-3 allows one channel of certain functional units to be bypassed for up to 4 hours to perform surveillance testing. A Note for ITS 3.3.2 Required Action C states, "One train may be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE." This ~~changes~~ rewords the CTS by specifically stating that surveillance testing can only be performed when the remaining train is OPERABLE. The purpose of the ITS Note phrase, "provided the other train is OPERABLE," is to remind the SR performer that there are only two trains of Automatic Actuation Logic and Actuation Relays for SI, Containment Spray, and Containment Isolation. With one train inoperable, testing the other train would disable the safety function. This change is acceptable because it restates the CTS requirements in more clearly defined terms. The CTS requirements are maintained in ITS format. The change is designated as an administrative change because it does not result in technical change to the CTS requirements.	3.3.2 Required Action C Note	Table 3.3-3	EDITORIAL BY NRC

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.19	CTS Table 4.3 – 2 Functional Units 1.b, 2.b, 3.b.1, 3.b.2, 4.b, 5.b, and 6.b1, the Automatic Actuation Logic for SI, Containment Spray, Containment Isolation (Phases A and B), Steam Line Isolation, Turbine Trip and Feedwater Isolation, AFW pump, and the Automatic Actuation Logic and Actuation Relays for Steam Line Isolation require a monthly CHANNEL FUNCTIONAL TEST to be performed. The surveillance frequency is modified by Note (2) that states, "Each train or logic channel shall be functionally tested at least every other 31 days . . ." ITS Surveillance Requirements (SR) for the Automatic Actuation Logic and Actuation Relays for SI, Containment Spray, Containment Isolation (Phase A Isolation and Phase B Isolation), Steam Line Isolation, Turbine Trip and Feedwater Isolation, and AFW, require SRs 3.3.2.2 and 3.3.2.3 to be performed. ITS SR 3.3.2.2 requires the performance of an ACTUATION LOGIC TEST (ALT) and ITS SR 3.3.2.3 states that a MASTER RELAY TEST (MRT) must be performed. The Frequency of both ITS SRs is "31 days on a STAGGERED TEST BASIS." This changes the CTS SR Frequency from "every other 31 days" to the ITS requirement of "31 days ~~on a~~ invoking STAGGERED TEST BASIS~~.~~" definition, while the CTS testing requirements are expressed in ITS terms of ALT and MRT. The purpose of the phrase "on a STAGGERED TEST BASIS" is to provide standard means of expressing the testing requirement frequency. The testing requirements of ALT and MRT continue to require the appropriate testing requirements for each safety function's Automatic Actuation Logic and Actuation Relays. This change is acceptable because the CTS testing requirements and frequencies are maintained in the ITS format. The change is designated as administrative change because it does not result in technical changes to the CTS requirements.	SR 3.3.2.2, SR 3.3.2.3	Table 4.3 – 2 Note (2)
3.3.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	
3.3.3 A.2	CTS LCO 3.3.3.6 states the PAM instrumentation channels listed in Table 3.3-10 shall be OPERABLE. ITS 3.3.3 states the PAM instrumentation for each function shall be OPERABLE. Each Function is listed in Table 3.3.3 – 1. A Note to the Actions states, "Separate Condition entry is allowed for each Function." This changes the CTS by adding a Note to the CTS requirements. The purpose for adding the Note to the Actions is to provide a clear understanding that each function is independent. Each function requires a parameter to be available for the operator to monitor during post accident conditions. In addition, this changes the format for initiating Completion Time clocks. This change is acceptable because the CTS is constructed to provide for separate entry into the Actions for each PAM function and the addition of the ITS Note clarifies the requirements. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.3 ACTIONS Note	3.3.3.6	EDITORIAL BY NRC
3.3.3 A.3	CTS SR 4.3.3.6 in Table 4.3-7 requires each PAM instrumentation channel to be demonstrated OPERABLE by the performance of a CHANNEL CALIBRATION on a refueling frequency. ITS SR 3.3.3.2 requires a CHANNEL CALIBRATION be performed on each PAM instrumentation function shown in Table 3.3.3-1, at a Frequency of eighteen months. A Note modifies the SR that excludes neutron detectors from CHANNEL CALIBRATIONS. This changes the CTS by ~~adding a~~ clarifying ~~Note~~ an existing allowance. The purpose of the Note is to exclude neutron detectors from the requirement because of the impracticality of this test on this device type. CTS requirement 4.3.1.1.1 states each reactor trip instrumentation channel will have a CHANNEL CALIBRATION performed in accordance with Table 4.3-1. Note (6) to the table applies to all nuclear instrumentation required for power operation. This states, "Neutron detectors may be excluded from CHANNEL CALIBRATION." Therefore, the inclusion of the Note is acceptable because this requirement parallels the requirements of the CTS for calibration of all other nuclear instrumentation channels. This change is designated as administrative because it does not result in a technical change to the CTS.	SR 3.3.3.2 Note	4.3.3.6	EDITORIAL BY NRC
3.3.3 A.4	CTS 3.3.3.6 Table 3.3-10 lists in two columns the requirements for accident monitoring instrumentation. These columns are labeled as, "Total No. of Channels" and "Minimum Channels OPERABLE." The CTS provides Actions stated as part of the LCO. ITS 3.3.3 Table 3.3.3-1 states the requirements for PAM Instrumentation in one column labeled "Required Channels." This changes the CTS by ~~deleting~~ only including the minimum channels OPERABLE column. The change is acceptable because the technical requirements of the CTS columns and Actions are incorporated in the ITS technical requirements. Any technical changes for the individual functions are addressed by other discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.	Table 3.3.3-1	Table 3.3-10	EDITORIAL BY NRC

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A.5	CTS 3.3.3.6 Table 3.3-10 lists the functions of Reactor Vessel Coolant Level Monitor, In Core Thermocouples, and Reactor Coolant System Subcooling Margin Monitor as required accident monitoring instruments. ITS 3.3.3 Table 3.3.3-1 groups these instruments under the Inadequate Core Cooling Monitor as subsystems. This changes the CTS by the regrouping PAM functions. This change is acceptable because the technical requirements remain unchanged. The incorporation of the functions under the system of inadequate core cooling does not change the instrument requirements. This change is designated as administrative because it does not result in a technical change to the CTS.	Table 3.3.3-1	Table 3.3-10
3.3.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.3.4 A.2	CTS 3.3.3.5 requirements for the auxiliary shutdown panel monitoring instrumentation channels state that the functions in Table 3.3-9 shall be OPERABLE. ITS LCO 3.3.4 provides a Note to the Actions that states, "Separate Condition entry is allowed for each Function." This changes the CTS by stating that separate Condition entry for each function is allowed. In addition, this changes the format for initiating Completion Time clocks. The purpose of the ITS Note is to state that individual functions may enter the conditional requirements separately and that each function has an independent Completion Time from each of the other instrumentation functions. This change is acceptable because it is consistent with the application of the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.	3.3.4 ACTIONS NOTE	3.3.3.5
3.3.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various

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Table A – Administrative Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A.2	CTS LCO 3.3.2.1, Engineered Safety Feature Actuation System (ESFAS) Instrumentation, states the trip setpoints for the features are required to be set consistent with the values listed in the Trip Setpoint column of Table 3.3-4. CTS Action b states, "With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3." ITS LCO 3.3.5, "Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation," requires specific channels per bus for the undervoltage and degraded voltage functions to be OPERABLE. This change maintains the CTS requirements for the loss of power function in the ITS format. This change is acceptable because the technical requirements for the LOP EDG function are maintained with the change in format. The LOP EDG function continue to start the EDG on a loss of voltage or degraded voltage within the assumed time of the safety analyses. This change is designated as administrative because it does not result in a technical change to the CTS.	LCO 3.3.5	3.3.2.1 Action b
3.3.5 A.3	CTS LCO 3.3.2.1 requires the ESFAS instrumentation channels to be OPERABLE in accordance with the requirements in Table 3.3-3. If a required channel becomes inoperable, the table provides the appropriate required Actions to be performed for each required function. ITS LCO 3.3.5 requires three channels per bus for the loss of voltage and degraded voltage functions to be OPERABLE. The ITS Actions provide the appropriate Conditions, Required Actions, and Completion Times for the LOP EDG function. A Note modifies the Actions that states, "Separate Condition entry is allowed for each function." This changes the CTS by specifically stating that each Condition may be entered for each function separately and follow a separate Completion Time resulting in no technical changes to CTS Action requirements. This change is acceptable because the requirements of the CTS are maintained in the ITS format. The functional requirements can affect each emergency bus separately, therefore the loss of voltage and degraded voltage function may be treated as independent. This change is designated as administrative because it does not result in a technical change to the CTS.	3.3.5 ACTIONS NOTE	Table 3.3-3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A.4	~~CTS Surveillance Requirement 4.3.2.1.2 requires the ENGINEERED SAFETY FEATURES RESPONSE TIME test on each ESFAS function at least once per 18 months. The requirement states, "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months." ITS SR 3.3.5.3 requires the verification of ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS (STB). This changes the CTS by deleting the logic train requirement for the LOP EDG start instrumentation.~~ CTS Surveillance Requirement 4.3.2.1.2 requires the ENGINEERED SAFETY FEATURES RESPONSE TIME test on each ESFAS function at least once per 18 months. The requirement states, "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that both logic trains are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3." ITS SR 3.3.5.3 requires the verification of ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS. The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS. This also changes the CTS by removing the references to logic train testing as the LOP EDG start instrumentation does not have logic trains. This change is acceptable because the requirements for ESFAS RESPONSE TIME testing for the ESFAS channels remain unchanged. ITS definition for STAGGERED TEST BASIS and its application in this requirement do not change the current testing frequency requirements. The ITS separates the LOP EDG start instrumentation, which does not have logic trains, from other ESFAS functions. Therefore, the CTS reference to logic trains is not required in ITS 3.3.5. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.3.5.3	4.3.2.1.2

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Table A – Administrative Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A.5	CTS Table 4.3-2 lists for Functional Unit 7, Loss of Power 4.16KV Emergency Bus requirements for a quarterly CHANNEL FUNCTIONAL TEST for the Loss of Voltage and Degraded Voltage functions. The CHANNEL FUNCTIONAL TEST does not require a verification of relay setpoints for the Loss of Voltage and Degraded Voltage functions. ITS SR 3.3.5.1 states that a TADOT must be performed every 92 days. The SR is modified by a Note that states, "Verification of setpoint is not required." This changes the CTS by specifically stating that setpoint verification is not required for the required quarterly testing. This change is acceptable because the verification of the relay setpoints require elaborate bench calibration and this is performed during the CHANNEL CALIBRATION. The CHANNEL CALIBRATION is performed every 18 months. The verification of relay setpoints has been consistently within the limits of the 18-month requirements. Therefore, the addition of the Note to the SR does not modify the CTS and is provided to clarify the requirement. The change is designated as administrative change because it does not result in technical change to the CTS requirements.	SR 3.3.5.1 NOTE	Table 4.3-2

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.2.1 LA.1	3.2.2, Action a	CTS 3.2.2, Action a, states than when $F_Q(Z)$ is exceeding its limit, POWER OPERATION may proceed provided the Overpower ΔT Trip Setpoint (value of K_4) has been reduced at least 1% (in ΔT span) for each 1% $F_Q(Z)$ exceeds the limit. ITS 3.2.1, Required Action A.2.3 states, "Reduce Overpower ΔT trip setpoints ≥ 1% for each 1% $F_Q^M(Z)$ exceeds limit." This changes the CTS by eliminating the parenthetical phrases, "(value of K_4)" and "(in ΔT span)" and placing the information in the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.2.1 LA.2	4.2.2.2.a	CTS 4.2.2.2.a states that $F_Q(Z)$ shall be evaluated to determine if F_Q is within its limit by using the moveable incore detectors to obtain a power distribution map at any THERMAL POWER greater than 5% of RATED THERMAL POWER. The ITS does not contain a similar statement and this information appears in the ITS Bases. This changes the CTS by moving information to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.2.1 LA.3	4.2.2.2.b, 4.2.2.3	CTS 4.2.2.2.b states that the measured $F_Q(Z)$ must be increased by 3% to account for manufacturing tolerances and further increased by 5% for measurement uncertainties. CTS 4.2.2.3 states that when $F_Q(Z)$ is measured for reasons other than meeting the requirements of Surveillance 4.2.2.2, the measured $F_Q(Z)$ must be increased by 3% to account for manufacturing tolerances and further increased by 5% for measurement uncertainties. The ITS does not contain this requirement. This information is contained in the ITS Bases. This changes the CTS by moving information to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.2.1 LA.4	4.2.2.2.c	CTS 4.2.2.2.c states that the measured $F_Q(Z)$ must meet a relationship provided in the Surveillance. The values for the	Bases	ITS 5.5.13, Technical	3

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Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
1.0 A.2	ITS Section 1.1 provides definitions of ACTUATION LOGIC TEST, MASTER RELAY TEST, and TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT). These terms are used as defined terms in the ITS but do not appear in the CTS. This change is acceptable because these changes do not impose any new requirements or alter existing requirements. Any technical changes due to the addition of these terms and definitions will be addressed in the Discussion of Changes (DOCs) for the sections of the Technical Specifications in which the terms are used. These changes are designated as administrative as they add defined terms which involve no technical change to the Technical Specifications.	1.1 definitions of ACTUATION LOGIC TEST, MASTER RELAY TEST, AND TADOT	None
1.0 A.3	CTS Section 1.0 provides a definition of SHUTDOWN MARGIN (SDM). The ITS Section 1.1 definition of SDM contains three differences from the CTS definition. • The CTS definition is changed to state the highest reactivity worth RCCA does not have to be assumed if the RCCAs can be verified fully inserted by two independent means. This change is described in DOC L.5. • The CTS definition is changed to indicate that the worth of any Rod Control Cluster Assemblies (RCCAs) which are not capable of being fully inserted must be accounted for in the determination of the SDM. This change is acceptable because it is consistent with the existing SDM requirements in CTS 3.1.1.1 and 3.1.1.2. • The CTS definition is clarified to include a description of the reactor conditions, i.e. nominal zero power level, at which the SDM is calculated. This change is acceptable because including this information is not a technical change. SDM calculations are currently performed for nominal zero power conditions. These changes are designated as administrative because they do not represent a technical change to the Technical Specifications.	1.1 definition of SDM	1.0 definition of SDM

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.4	The CTS Section 1.0 definition of CHANNEL FUNCTIONAL TEST includes the requirements for performing a CHANNEL FUNCTIONAL TEST on bistable channels. ITS Section 1.1 moves these requirements to a new defined term, TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT). This change is acceptable because the movement of this information does not impose any new requirements or alter existing requirements. Any technical changes associated with the movement of this information will be addressed in other DOCs. This change is categorized as administrative because it is the movement of information within the Technical Specifications.	1.1 definition of TADOT	1.0 definition of CHANNEL FUNCTIONAL TEST
1.0 A.5	CTS Section 1.0 provides a definition of CORE ALTERATION. The ITS Section 1.1 definition of CORE ALTERATION revises the CTS definition to eliminate two redundant phrases. • The CTS definition includes, "movement or manipulation" of any component within the reactor vessel. The ITS definition of CORE ALTERATION will only include "movement" of components, not "manipulation." This change is acceptable because the eliminated phrase adds no value. In the context of this definition, any manipulation of a component will involve its movement, so stating "movement or manipulation" is redundant and potentially confusing. • The CTS definition does not preclude completion of movement of a component to a "safe conservative" position. The ITS definition specifies only a "safe" position. This change is acceptable because the eliminated phrase adds no value. The Technical Specifications provide no basis for determining whether a movement is conservative, so it is assumed that the word "conservative" is used in the definition to mean "safe." Therefore, stating "safe conservative" is repetitious and potentially confusing. These changes are designated administrative because they represent the elimination of redundant words and phrases without changing the intent of the definition.	1.1 definition of CORE ALTERATION	1.0 definition of CORE ALTERATION

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.6	CTS Section 1.0 provides a definition of FREQUENCY NOTATION and includes CTS Table 1.2, which lists these notations. The ITS will not contain this information in Section 1.1, but will state the requirements in each Surveillance. This change is acceptable because each ITS Surveillance Requirement (SR) provides the specific frequency without relying on a notation (e.g., "31 days" versus "M"). Providing the specific frequencies in the Surveillance Requirements eliminates the need for the FREQUENCY NOTATION definition and CTS Table 1.2. Any Surveillance Frequencies altered by the elimination of the definition and table will be addressed in a DOC for the affected section. This change is designated as administrative because it does not change any SR frequencies.	None	1.0 definition of FREQUENCY NOTATION and Table 1.2
1.0 A.7	CTS Section 1.0 provides a definition of FULLY WITHDRAWN, which defines the fully withdrawn position of the RCCAs as between 225 and 229 steps. The ITS will not include FULLY WITHDRAWN as a defined term. This change is acceptable because the term FULLY WITHDRAWN is not used as a defined term in the ITS or ITS Bases. This change is designated as administrative because it eliminates a defined term that is no longer used	None	1.0 definition of FULLY WITHDRAWN
1.0 A.8	CTS Section 1.0 includes the following definitions: CONTAINMENT INTEGRITY, GASEOUS RADWASTE TREATMENT SYSTEM, MEMBER(S) OF THE PUBLIC, PURGE - PURGING, REPORTABLE EVENT, SITE BOUNDARY, SOURCE CHECK, UNRESTRICTED AREA, VENTILATION EXHAUST TREATMENT SYSTEM, VENTING. The ITS does not use this terminology and ITS Section 1.1 does not contain these definitions. These changes are acceptable because the terms are not used as defined terms in the ITS. Discussions of any technical changes related to the deletion of these terms are included in the DOCs for the CTS sections in which the terms are used. These changes are designated as administrative because they eliminate defined terms that are no longer used.	None	Listed 1.0 definitions

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.9	CTS Section 1.0 provides definitions for CONTROLLED LEAKAGE, IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE. ITS Section 1.1 includes these requirements in one definition called LEAKAGE (which includes three categories: identified LEAKAGE, unidentified LEAKAGE, and pressure boundary LEAKAGE). This changes the CTS by incorporating the definitions into the ITS LEAKAGE definition with no technical changes. The CTS term CONTROLLED LEAKAGE, which is the seal water flow supplied to the reactor coolant pump seals, is no longer considered leakage and has its own specification titled "Seal Injection Flow" as ITS 3.5.5. Since Seal Injection flow is no longer considered leakage, it appears as an exception in the CTS definitions of IDENTIFIED LEAKAGE and UNIDENTIFIED LEAKAGE. As a result, the ITS will not contain a defined term, "Controlled Leakage." This change is acceptable because it results in no technical changes to the Technical Specifications. This change is designated an administrative change in that it rearranges existing definitions, with no change in intent.	1.1 definition of LEAKAGE	1.0 definitions of CONTROLLED LEAKAGE, IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE
1.0 A.10	CTS Section 1.0 provides definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR PROTECTIVE SYSTEM RESPONSE TIME. ITS Section 1.1 modifies the definitions to more fully describe how the tests are performed. This changes the CTS by stating that the response time test may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. This change is acceptable because the ITS definitions are consistent with current plant practices, as well as the guidance provided in IEEE 338-1977, Section 6.3.4, "Response Time Verification Tests." The results of the test are unaffected by this allowance. This change is designated as administrative as it does not result in a technical change to the response time tests.	1.1 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR PROTECTIVE SYSTEM RESPONSE TIME	1.0 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR PROTECTIVE SYSTEM RESPONSE TIME

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.11	CTS Section 1.0 defines CHANNEL FUNCTIONAL TEST as "the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions." ITS Section 1.1 renames the CTS definition to CHANNEL OPERATIONAL TEST (COT) and defines it as, "the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps." The addition of use of an actual signal is discussed in DOC L.1. This changes the CTS by stating that the COT shall include adjustments, as necessary, of the devices in the channel so that the setpoints are within the required range and accuracy, changes the example list of devices contained in the definition, and states that the test may be performed by means of any series of sequential, overlapping, or total channel steps. This change is acceptable because the ITS definition is consistent with current plant practices and the results of the test are unaffected by the change. • The CTS definition states that the CHANNEL FUNCTIONAL TEST shall verify that the channel is operable "including alarm and/or trip initiating action." The ITS states that the COT shall verify OPERABILITY of "all devices in the channel required for channel OPERABILITY." This change is acceptable because the statements are equivalent in that both require that the channel be verified to be OPERABLE. The CTS and the ITS use different examples of what is included in a channel, but this does not change the intent of the requirement. The ITS use of the phrase "all devices in the channel required for channel OPERABILITY" reflects the CTS understanding that the test only includes those portions of the channel needed to perform the safety function. • The ITS states, "The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy." This change is acceptable because it clarifies that adjustments performed during a COT do not invalidate the test. This is consistent with the current implementation of the CHANNEL FUNCTIONAL TEST and does not result in a technical change to the specifications. • The ITS states, "The COT may be performed by means of any series of sequential, overlapping, and total channel steps." This change is acceptable because it states current Industry practice. This is consistent with the current implementation of the CHANNEL FUNCTIONAL TEST and does not result in a technical change to the specifications. This change is designated as administrative because it does not result in a technical change to the specifications.	1.1 definition of CHANNEL OPERATIONAL TEST	1.0 definition of CHANNEL FUNCTIONAL TEST

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.12	The CTS defines CHANNEL CALIBRATION as, "A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated." ITS defines CHANNEL CALIBRATION as, "the adjustment, as necessary, of the channel so that it responds within the required range and accuracy to known input. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping calibrations or total channel steps." This results in a number of changes to the CTS. The CTS definition states, "The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions" The ITS states, "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY." The CTS states that the CHANNEL CALIBRATION "shall include the CHANNEL FUNCTIONAL TEST." The ITS does not include this statement. The ITS adds the statement, "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel."	1.1 definition of CHANNEL CALIBRATION	1.0 definition of CHANNEL CALIBRATION
1.0 A.13	The CTS Section 1.0 definition of OPERABLE requires a system, subsystem, train, component or device to be capable of performing its "specified function(s)" and all necessary support systems to also be capable of performing their "function(s)." The ITS Section 1.1 definition of OPERABLE requires the system, subsystem, train, component or device, and all necessary support systems, to be capable of performing the "specified safety function(s)". This changes the CTS by altering the requirement to be able to perform "functions" to a requirement to be able to perform "safety functions." The purpose of the CTS and ITS definitions of OPERABLE is to ensure that the safety analysis assumptions regarding equipment and variables are valid. This change is acceptable because the intent of both the CTS and ITS definitions is to address the safety function(s) assumed in the accident analysis and not encompass other non-safety functions a system may also perform. These non-safety functions are not assumed in the safety analysis and are not needed in order to protect the public health and safety. This change is consistent with the current interpretation and use of the terms OPERABLE and OPERABILITY. This change is designated as administrative as it does not change the current use and application of the Technical Specifications.	1.1 definition of OPERABLE - OPERABILITY	1.0 definition of OPERABLE - OPERABILITY

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.14	CTS Section 1.0 and Table 1.1, "OPERATIONAL MODES," provide a description of the MODES. ITS Section 1.1 and Table, 1.1-1, "MODES," changes the CTS MODE definitions in several ways: • The phrase "the vessel head closure bolts" is replaced with "one or more vessel head closure bolts" in Note **. This change is acceptable because the revised phrase is consistent with the current interpretation and usage. MODE 6 is currently declared when the first vessel head closure bolt is detensioned. • The Note ** condition, "fuel in the reactor vessel" is moved from Table 1.1 to the MODE definition. This change is acceptable because it moves information within the Technical Specifications with no change in intent. • The phrase "or with the head removed" is eliminated from Note **.This change is acceptable because it eliminates a redundant phrase. The reactor vessel head cannot be removed unless the reactor vessel head closure bolts are detensioned. Since "One or more reactor vessel head closure bolts less than fully tensioned" is already specified in the Note, including "or with the head removed" is unnecessary. • ITS Table 1.1-1 contains a new Note, labeled "(b)", which applies to MODES 4 and 5. Note (b) states, "All reactor vessel head closure bolts fully tensioned." This Note is the opposite of CTS Note ** and ITS Note (c).This change is acceptable because it avoids a conflict between the definition of MODE 6 and the other MODES should RCS temperature increase above the CTS MODE 6 temperature limit when a reactor vessel head closure bolt is less than fully tensioned. This ITS Note is included only for clarity. It is consistent with the current use of MODES 4 and 5 and does not result in any technical change to the application of the MODES. • For consistency with the Notes in ITS Table 1.1-1, the ITS definition of MODE incorporates "reactor vessel head closure bolt tensioning" to the list of characteristics that define a MODE.This change is acceptable because the definition of MODE should be consistent with the MODE table in order to avoid confusion. This change is made only for consistency and results in no technical changes to the Technical Specifications. These changes are designated as administrative because they clarify the application of the MODES and no technical changes to the MODE definitions are made. The clarifications are consistent with the current use and application of the MODES.	1.1 definition of MODE and Table 1.1-1	1.0 definition of OPERATIONAL MODES and Table 1.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.15	The CTS Section 1.0 definition of STAGGERED TEST BASIS states, "A STAGGERED TEST BASIS shall consist of: a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals, b. The testing of one system, subsystem, train, or other designated component at the beginning of each subinterval." The ITS Section 1.1 definition states, "A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during *n* Surveillance Frequency intervals, where *n* is the total number of systems, subsystems, channels, or other designated components in the associated function." This changes the CTS to specify the frequency of a Surveillance on one system, subsystem, train, or other designated component in the Frequency column of the ITS instead of specifying the frequency in which all systems, subsystems, trains, or other designated components must be tested. This change is acceptable because the testing frequency of components on a STAGGERED TEST BASIS is not changed. Unlike the CTS definition, the ITS definition allows the Surveillance interval for one subsystem to be specified in the Frequency column of the applicable Surveillance Requirements, independent of the number of subsystems. As an example, consider a three channel system tested on a STAGGERED TEST BASIS. The CTS would specify testing every three months on a STAGGERED TEST BASIS, which results in one channel being tested each month (three equal subintervals). Under the ITS definition, the Surveillance frequency would be monthly on a STAGGERED TEST BASIS and, again, one channel would be tested each month. In both the CTS and ITS definition, all channels are tested every three months. Each test under the CTS definition would be performed at the beginning of the subinterval. Under the ITS definition, each Surveillance Frequency starts at the beginning of the CTS definition subinterval. Thus, there are no net changes in the testing interval. This change represents an editorial preference in the ITS. This change is designated as administrative as no technical changes are made to the Technical Specifications	1.1 definition of STAGGERED TEST BASIS	1.0 definition of STAGGERED TEST BASIS

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.16	ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on the ITS usage that is not applicable to the CTS. The added sections are: • Section 1.2 - Logical Connectors Section 1.2 provides specific examples of the logical connectors "AND" and "OR" and the numbering sequence associated with their use. • Section 1.3 - Completion Times Section 1.3 provides proper use and interpretation of Completion Times. The section also provides specific examples that aid in the use and understanding of Completion Times. • Section 1.4 - Frequency Section 1.4 provides proper use and interpretation of the Surveillance Frequency. The section also provides specific examples that aid in the use and understanding of Surveillance Frequency. This change is acceptable because it aids in the understanding and use of the format and presentation style of the ITS. The addition of these sections does not add or delete technical requirements, and will be discussed specifically in those Specifications where application of the added sections results in a change. This change is designated as administrative because it does not result in a technical change to the Technical Specifications	1.2, 1.3, and 1.4	None

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.17	CTS Table 1.1, OPERATIONAL MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are: • The minimum average reactor coolant temperature for MODES 1 and 2 provided in CTS Table 1.1 is changed to NA (not applicable) in ITS Table 1.1-1. This change is acceptable because ITS LCO 3.4.2, RCS Minimum Temperature for Criticality, provides the minimum reactor coolant temperature limits for MODES 1 and 2. Therefore, the 350°F minimum temperature does not provide any useful information in Table 1.1-1, and is deleted from the ITS. • The CTS Table 1.1 MODE 6 upper limit on average reactor coolant temperature is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is given as "NA" (not applicable). This change is acceptable because it eliminates a conflict in the CTS MODE table. If the average coolant temperature exceeds the upper limit with the reactor vessel head closure bolts less than fully tensioned, the CTS Table could be misinterpreted as no MODE being applicable. This is not the intent of the CTS or ITS MODE 6 definitions. By removing the temperature reference, this ambiguity is eliminated. • The CTS Table 1.1 RATED THERMAL POWER limits of 0% for MODES 3, 4, 5, and 6 are changed in ITS Table 1.1-1 to "NA" (not applicable). This change is acceptable because the reactivity and plant equipment limitations in MODES 3, 4, 5 and 6 do not allow power operation. Therefore, it is not necessary to have these restrictions in the MODE table. These changes are designated as administrative because they result in no technical changes to the Technical Specifications	Table 1.1-1	Table 1.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.18	CTS Section 1.0 defines a SLAVE RELAY TEST as "the energization of each slave relay and verification of OPERABILITY of each relay. The SLAVE RELAY TEST shall include a continuity check, as a minimum, of associated testable actuation devices." ITS Section 1.1 defines the SLAVE RELAY TEST as, "the energization of all slave relays in the channel required for channel OPERABILITY and verification of OPERABILITY of each required slave relay. The SLAVE RELAY TEST shall include a continuity check of associated testable actuation devices. The SLAVE RELAY TEST may be performed by means of any series of sequential, overlapping, or total channel steps." This changes the CTS by stating that the SLAVE RELAY TEST shall include the slave relays required for channel OPERABILITY and by stating that the test may be performed by means of any series of sequential, overlapping, or total channel steps. This change is acceptable because the ITS definition is consistent with current plant practices and the results of the test are unaffected by the change. • The CTS definition states that the SLAVE RELAY TEST shall energize "each slave relay." The ITS states that the SLAVE RELAY TEST shall include the energization of "all slave relays in the channel required for channel OPERABILITY." This change is acceptable because the statements are equivalent in that both require that the channel be verified to be OPERABLE. The ITS use of the phrase "all slave relays in the channel required for channel OPERABILITY" reflects the CTS understanding that the test only includes those portions of the channel needed to perform the safety function. • The ITS states, "The SLAVE RELAY TEST may be performed by means of any series of sequential, overlapping, and total channel steps." This change is acceptable because it states current Industry practice. This is consistent with the current implementation of the SLAVE RELAY TEST and does not result in a technical change to the specifications. This change is designated as administrative because it does not result in a technical change to the specifications.	1.1 definition of SLAVE RELAY TEST	1.0 definition of SLAVE RELAY TEST

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L.4	The CTS Section 1.0 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME require measurement of the response time from the sensor through the actuated equipment. The ITS definitions of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME are modified to state, " In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC." This changes the CTS by eliminating the requirement to include all components in a response time test.	1.1 definition of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME	1.0 definition of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME	Note 1
1.0 L.5	~~The CTS Section 1.0 definition of SHUTDOWN MARGIN (SDM) states, "SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full length rod cluster assemblies (shutdown and control) are fully inserted except for the single rod cluster assembly of highest reactivity worth which is assumed to be fully withdrawn." The ITS Section 1.1 definition of SHUTDOWN MARGIN (SDM) states, in part, "SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming: a. all rod cluster control assemblies (RCCAs) are fully inserted except for the single RCCA of highest reactivity worth, which is assumed to be fully withdrawn. However, with all RCCAs verified fully inserted by two independent means, it is not necessary to account for a stuck RCCA in the SDM calculation." This changes the CTS by providing an allowance to not assume the RCCA of highest worth is stuck if all RCCAs can be verified fully inserted by two independent means.~~DELETED	~~1.1 definition of SDM~~	~~1.0 definition of SDM~~	~~Note 1~~

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Change Categories:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Chapter 1.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Chapter 1.0.

Table A – Administrative Changes
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
2.0 A.2	CTS 2.1.1 references three curves providing limits on THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature (Tavg). One curve applies to three loop operation (Figure 2.1-1) and two apply to two-loop operation (Figures 2.1-2 and 2.1-3). In the CTS, Figures 2.1-2 and 2.1-3 are replaced with a note stating, "This page left blank pending NRC approval of ECCS evaluation of two loops in operation with the third loop isolated" and "This page left blank pending NRC approval of ECCS evaluation of two loops in operation with the third loop not isolated," respectively. ITS 2.1.1 does not contain an allowance to operate with less than three reactor coolant loops in operation. This changes the CTS by eliminating references and place holders for curves applying to two-loop operation. This change is acceptable because the requirements have not changed. Both the ITS and the CTS require all three loops in operation in the applicable MODES (MODES 1 and 2). This change is designated as administrative because it eliminates an option in the CTS which cannot be used.	None	2.1.1, Figures 2.1-2 and 2.1-3
2.0 A.3	Unit 1 CTS 2.1.1 contains a Note and an additional Figure, Figure 2.1-1a, which is to be used for the period of operation until steam generator replacement. ITS 2.1.1 does not contain a similar Note or additional Figure. This change is acceptable because the North Anna Unit 1 steam generators have been replaced and the Note and the Figure are no longer applicable. This change is designated as administrative because it eliminates information from the CTS that is no longer applicable.	None	Unit 1 2.1.1, Unit 1 Figure 2.1-1a

Table A – Administrative Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.2	Unit 1 CTS 3.0.1 states, "Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification." Unit 2 CTS 3.0.1 states, "Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met." ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as noted in LCO 3.0.2 and 3.0.7." This results in several changes to the CTS. • Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "Limiting Conditions for Operation" is changed to "LCOs", and "OPERATIONAL MODES or other conditions specified" is changed to "MODES and other specified conditions" to be consistent with the ITS definition of MODE and the terminology used in the ITS. These changes are acceptable because they result in no change in the intent or application of the specification, but merely reflect editorial preferences used in the ITS. • The Unit 1 phrase ". . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . ." and the Unit 2 phrase ". . . except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met" are moved from CTS 3.0.1 to ITS LCO 3.0.2 which states that when an LCO is not met, the Required Actions must be met. The change is acceptable because moving this information within the Technical Specifications results in no change in the intent or application of ACTIONS. • The Unit 1 CTS 3.0.1 phrase "Limiting Conditions for Applicability . . . shall be applicable" and the Unit 2 CTS 3.0.1 phrase "Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required" are replaced in ITS LCO 3.0.1 with the phrase "LCOs shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (e.g., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (e.g., the requirements in the LCO apply.) This change is acceptable because it is an editorial change that does not change the intent of the requirements.	LCO 3.0.1	3.0.1

Table A – Administrative Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.2 (con't)	• The phrase "except as provided in LCO 3.0.2 and LCO 3.0.7" is added to CTS 3.0.1. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. This change is acceptable because adding the exception for LCO 3.0.2 and LCO 3.0.7 prevents a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Specifications. These changes are designated administrative because they are editorial and result in no technical changes to the Technical Specifications.	LCO 3.0.1	3.0.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.3	Unit 1 CTS 3.0.2 states, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." Unit 2 CTS 3.0.2 states the same requirements, but in the negative, as, "Noncompliance with a specification shall exist when the requirements of the Limiting Conditions for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Conditions for Operation is restored prior to expirations of the specified time intervals, completion of ACTION requirements is not required." ITS LCO 3.0.2 states, "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This results in several change to the CTS. • The first sentence in Unit 1 CTS 3.0.2, states, in part, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the Specification." This requirement is divided into portions of ITS LCO 3.0.1, "LCOs shall be met" and ITS LCO 3.0.2, "Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met". This change is acceptable because the intent of the CTS requirement is preserved, but the aspects of LCO compliance and the performance of ACTIONS when the LCO is not met are separated. • Unit 2 CTS 3.0.2, states, "Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals." This sentence is deleted. This information currently is stated in Unit 2 CTS 3.0.1 and is moved to ITS 3.0.2 as described in Discussion of Change A.2. ITS 3.0.2 states that the Required Actions are to be taken when the LCO is not met. This rearrangement separates the description of LCOs (in ITS LCO 3.0.1) and the description of Required Actions (in ITS LCO 3.0.2). This change is acceptable because it makes the Unit 1 and Unit 2 descriptions of LCOs and Required Actions identical and improves clarity, without changing the intent of the CTS.	LCO 3.0.2	3.0.2

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.3 (con't)	• The Unit 1 and Unit 2 CTS 3.0.2 are revised to include an exception for LCO 3.0.5 and 3.0.6. LCO 3.0.5 and LCO 3.0.6 are new allowances which take exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements. This change is acceptable because it includes references to new items in the ITS and results in no change to the CTS. Changes resulting from the incorporation of LCO 3.0.5 and LCO 3.0.6 are discussed in Discussions of Change L.2 and L.3. • The second sentence of Unit 1 CTS LCO 3.0.2 states, "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The second sentence of Unit 2 CTS LCO 3.0.2 states, "If the Limiting Conditions for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required." These sentences state the same requirement. They are replaced in ITS LCO 3.0.2 with, "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This change is acceptable because, while worded differently, both the CTS and ITS state that ACTIONS do not have to be completed once the LCO is met or is no longer applicable. ITS LCO 3.0.2 also adds the phrase, "unless otherwise stated." There are some ITS ACTIONS which must be completed, even if the LCO is met or is no longer applicable. This change is acceptable because it reflects a new feature in the ITS which did not exist in the CTS. The technical aspects of these changes are discussed in the appropriate ITS sections. These changes are designated as administrative because they are editorial and do not result in technical changes to the Technical Specifications.	LCO 3.0.2	3.0.2

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.4	CTS LCO 3.0.3 is applicable, "when a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable, "when an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions. • ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken. This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3. • ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The current Technical Specifications do not contain requirements that direct entry into LCO 3.0.3. The ITS does contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected specifications. This change is acceptable because referencing a new feature in the ITS is an editorial change. These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.	LCO 3.0.3	3.0.3
3.0 A.5	CTS 3.0.3 states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS 3.0.3 states the time limits (Completion Times) from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3. These changes are acceptable because the ITS times are the sum of the CTS times (e.g., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours.) This changes the CTS presentation only, and the time allowed to enter each MODE is unchanged. Using MODE numbers instead of the corresponding MODE titles is an editorial preference which results in no change the requirements in the Technical Specifications. These changes are designated as administrative as they implement the editorial conventions used in the ITS without resulting in technical changes to the specifications.	LCO 3.0.3	3.0.3

Table A – Administrative Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.6	CTS 3.0.3 states, "Where corrective measures are completed that permit operation under the ACTION requirement, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states this as, "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required." This change is acceptable because the changes to CTS 3.0.3 are editorial. Both the CTS and ITS state that LCO 3.0.3 can be exited if the LCO which lead to the entry into LCO 3.0.3 is met, or if one of the ACTIONS of that LCO is applicable. The CTS requirement also specifies that the time to complete the ACTIONS in the LCO is based on the initial failure to meet the LCO. Reentering the LCO after exiting LCO 3.0.3 does not reset the ACTION statement time requirements. This information is not explicitly stated in ITS LCO 3.0.3 but is true under the multiple condition entry concept of the ITS. This change is designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.	LCO 3.0.3	3.0.3

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.7	Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." The Unit 2 CTS 3.0.4 is identical, except that the phrase, "unless otherwise excepted" is eliminated from the first sentence and a sentence is added stating, "Exceptions to these requirements are stated in individual specifications." ITS 3.0.4 states, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRC. ~~: a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, or, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate.~~ This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." The addition of the a) and b) conditions is described in Discussion of Change (DOC) L.1. The following changes are made to CTS 3.0.4: • Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." Unit 2 CTS 3.0.4 is the same, except as described above. ITS LCO 3.0.4 does not contain a discussion of exceptions, but LCO 3.0.4.c states that specific value or parameter allowances, as approved by the NRC, may be used. The list of value or parameter allowances is in the Bases and lists LCO 3.4.16, RCS Specific Activity. This change is acceptable because the provisions in ITS LCO 3.0.4 eliminate the need for specific exceptions in individual specifications. The specific exceptions are eliminated from the specifications and discussed in specific DOCs in those specifications. Elimination of reference to these exceptions is acceptable because it does not technically change the specifications. This change is designated as administrative because the change is needed to reflect technical changes made in other specifications. The technical aspects of those changes are discussed in other DOCs.	LCO 3.0.4	3.0.4

Revision 17

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.7 (con't)	• Unit 1 and Unit 2 CTS 3.0.4 states, "This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." ITS LCO 3.0.4 states in part, "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." This change is acceptable because these statements are equivalent. Both are stating that LCO 3.0.4 shall not prevent a unit shutdown required by the Technical Specifications. The ITS wording recognizes that there are conditions in the Applicability that are not MODES, such as "During Core Alterations." This change is designated as administrative as there is no change in the intent of CTS 3.0.4 and no additional flexibility is granted.	LCO 3.0.4	3.0.4
3.0 A.8	ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states, "Test Exception LCOs [3.1.8] and 3.4.19 allow specified Technical Specification requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications." This change is acceptable because the current Technical Specifications contain test exception specifications which allow certain LCOs to not be met for the purpose of special tests and operations. However, the CTS does not contain the equivalent of LCO 3.0.7. As a result, there could be confusion regarding which LCOs are applicable during special tests and LCO 3.0.7 was crafted to avoid that possible confusion. LCO 3.0.7 is consistent with the use and application of current test exception Specifications and does not provide any new restriction or allowance. This change is designated as administrative because it does not technically change the specifications.	LCO 3.0.7	None

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9	CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. The first sentence of CTS 4.0.3 states that failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The last sentence of CTS 4.0.3 states that Surveillance Requirements do not have to be performed on inoperable equipment. ITS SR 3.0.1 states that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits. Surveillances may be performed by means of any series of sequential, overlapping, or total steps. The changes to the CTS are: • The first sentence of CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. ITS SR 3.0.1 states that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. This change is acceptable because the requirements are identical. Changes from Limiting Conditions for Operation to LCO, Surveillance Requirement to SR, and OPERATIONAL MODES to MODES are editorial preferences made to be consistent with the ITS format. This change is designated as administrative because the intent of the requirement is unchanged.	SR 3.0.1	4.0.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9 (con't)	• The first sentence of CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved to ITS SR 3.0.1 which states, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." This changes the CTS by adding the clarification, "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance." This change is acceptable because it is consistent with the current use and application of the Technical Specifications and with previous NRC guidance. This change is designated as administrative because it clarifies the Technical Specifications with no change in intent. • CTS 4.0.3 which states in part, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved from CTS 4.0.3 to ITS SR 3.0.1. ITS SR 3.0.1 states, "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3." This change is acceptable and is designated as administrative because moves information within the Technical Specifications with no change in intent. The reference to SR 3.0.3 is editorial and any technical changes resulting from SR 3.0.3 are discussed in another DOCs. • CTS 4.0.3 states, in part, "Surveillance requirements do not have to be performed on inoperable equipment." ITS SR 3.0.1 states, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." This changes the CTS by including "variables within limits" in recognition that not all Surveillances test equipment, but may test variables such as boron concentration, power distribution factors, temperatures, and pressures. This does not change the current use and application of the statement in CTS 4.0.3. This change is acceptable and is designated as administrative because moves and clarifies information within the Technical Specifications with no change in intent.	SR 3.0.1	4.0.1

Table A – Administrative Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9 (con't)	• ITS 3.0.1 states, in part, "Surveillances may be performed by means of any series of sequential, overlapping, and total steps. This changes the CTS by explicitly stating an accepted industry practice. This does not change the current use and application of the statement in CTS 4.0.1. This change is acceptable and is designated as administrative because it clarifies information within the Technical Specifications with no change in intent.	SR 3.0.1	4.0.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.10	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in several changes to the CTS. • ITS SR 3.0.2 adds to the CTS, "For Frequencies specified as 'once,' the above interval extension does not apply. This is described in DOC M.2. • ITS SR 3.0.2 adds to the CTS, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L.5. • ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications. This change is acceptable because the ITS presentation has the same intent as the CTS requirement. • ITS SR 3.0.2 adds to the CTS, "Exceptions to this Specification are stated in the individual Specifications." This change is acceptable because it reflects practices used in the ITS that are not used in the CTS. Any changes to a specification, by inclusion of such an exception, will be addressed in the affected specification. The changes are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.	SR 3.0.2	4.0.2

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.11	CTS 4.0.3 states, in part, that the time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. ITS 3.0.3 states that if it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. This adds to the CTS that this delay period is permitted to allow performance of the Surveillance and that if the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. Changes to the time allowed to perform the missed Surveillance are described in DOC L.6. This change is acceptable because this additional information does not change the current intent or application of CTS 4.0.3. It is understood that CTS 4.0.3 requires that the appropriate ACTIONS be taken if the SR is not performed during the time allowed by CTS 4.0.3 or if the SR is performed but fails. This change is designated as administrative because the added detail is consistent with the current intent and application of the Technical Specifications.	SR 3.0.3	4.0.3

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.12	CTS 4.0.4 restricts entry into MODES or other conditions specified in the Applicability unless the applicable SRs have been successfully performed. ITS SR 3.0.4 contains the same restriction, but adds an allowance that, "This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS in two ways: • ITS SR 3.0.4 adds an allowance that failure to perform a Surveillance will not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. This change is acceptable because it is consistent with the current understanding and application of CTS 4.0.4 and is necessary to avoid a conflict between SR 3.0.4 and other Specifications. • ITS SR 3.0.4 adds an allowance that failure to perform a surveillance will not prevent entry into MODES or other specified conditions in the Applicability "that are part of a shutdown of the unit." ITS SR 3.0.4 is also only applicable in MODES 1, 2, 3 and 4. These changes are addressed in DOC L.4. This change is designated as administrative because there is no change in the intent of CTS 4.0.4 and no additional flexibility granted.	SR 3.0.4	4.0.4

Table L – Less Restrictive Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L.1	CTS 3.0.4 does not allow entry into a MODE or other specified condition in the Applicability when an LCO is not met and while relying on ACTIONS without a specific exception. ITS LCO 3.0.4 contains the same restriction, but eliminates specific exceptions and includes an allowance to enter a MODE or condition specified in the Applicability “"a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRCa~~) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, or, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate~~." CTS 4.0.4 states that entry into a MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise stated. ITS SR 3.0.4 states that entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency. When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: "a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk	LCO 3.0.4	3.0.4	Note 1

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Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Section 3.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Section 3.0.

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRC.~~a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, or, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate.~~" This changes the CTS by allowing additional circumstances under which a MODE or other specified condition in the Applicability may be entered when the LCO is not met. ITS LCO 3.0.4.c is addressed in DOC A.7.			
3.0 L.2	ITS LCO 3.0.5 is added to the CTS. ITS LCO 3.0.5 states, "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."	LCO 3.0.5	None	Note 1
3.0 L.3	CTS 3.0.5 provides an exception to the definition of OPERABILITY for normal and emergency power and to CTS 3.0.2. ITS LCO 3.0.6 replaces CTS 3.0.5 and expands the concept to apply to all Technical Specifications which support other Technical Specifications equipment, not only normal and emergency power. This changes the CTS in several ways. First, CTS 3.0.5 provides an exception to the definition of OPERABILITY and to the requirement to follow the Required Actions when an LCO is not met when a system, subsystem, train, or component is inoperable due to either the normal or emergency power source being inoperable. ITS LCO 3.0.6 expands that	LCO 3.0.6	3.0.5	Note 1

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Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Section 3.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Section 3.0.

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	or other specified condition in the Applicability unless the LCO or SR, respectively, is satisfied. ITS LCO 3.0.4 and ITS SR 3.0.4 are only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4. In addition, ITS LCO 3.0.4 and ITS SR 3.0.4 do not prohibit entry into a MODE or other specified condition if such entry is part of a shutdown of the unit.	3.0.4		
3.0 L.5	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "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 remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC M.2.	SR 3.0.2	4.0.2	Note 1
3.0 L.6	CTS 4.0.3 states, in part, "The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours." ITS SR 3.0.3 states in part, "If it	SR 3.0.3	4.0.3	Note 1

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Section 3.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Section 3.0.

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed." This changes the CTS by, 1) allowing a minimum of 24 hours and up to the specified Frequency to perform the missed Surveillance, provided a risk evaluation is performed for any Surveillance delayed greater than 24 hours, and 2) basing the time allowed to perform a missed Surveillance before taking the Required Actions on the Surveillance Frequency instead of the allowed outage time.			

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Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

Note 1 - The Less Restrictive changes for Section 3.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Section 3.0.

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
3.1.1 A.2	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3 and 4. CTS 3.1.1.2 provides SDM requirements in MODE 5. ITS 3.1.1 provides SDM requirements in MODE 2 with $K_{eff} < 1.0$ and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements for MODE 2 with $K_{eff} < 1.0$ and MODES 3, 4, and 5. The change in Applicability for MODE 1 and MODE 2 with $K_{eff} \geq 1.0$ are described in DOC A.3. This change is acceptable because the requirements have not changed. Combining the specifications is an editorial change. Any technical changes resulting from this combination are discussed in other DOCs. This change is designated as administrative because it does not result in a technical change to the specification.	3.1.1	3.1.1.1 and 3.1.1.2
3.1.1 A.3	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3 and 4. Surveillance 4.1.1.1.1.b states that when in MODES 1 and 2 with $K_{eff} \geq 1.0$, SDM is verified by verifying that the control banks are within the insertion requirements of CTS 3.1.3.6, Control Rod Insertion Limits. ITS 3.1.1 is Applicable in MODE 2 with $K_{eff} < 1.0$ and MODES 3, 4, and 5. ITS 3.1.5 contains the control bank insertion requirements. This changes the CTS by dividing the SDM requirements and placing those applicable in MODE 2 with $K_{eff} < 1.0$ $\Delta k/k$ and MODES 3, 4, and 5 in ITS 3.1.1 and placing those applicable in MODE 1 and MODE 2 with $K_{eff} \geq 1.0$ in the control bank specifications. The purpose of CTS 3.1.1.1 is to ensure that the SDM assumed in the accident analyses is available. When the reactor is critical, SDM is verified by ensuring that the control rods are above the rod insertion limits. The Applicability Bases to ITS 3.1.1 states that in MODES 1 and 2, SDM is ensured by complying with LCO 3.1.5, Shutdown Bank Insertion Limits" and LCO 3.1.6, "Control Bank Insertion Limits." This change is acceptable because the SDM requirements have not changed. Even though CTS 3.1.1.1 is applicable in MODES 1 and 2, the CTS Surveillances state that it is verified by meeting the rod insertion limits. The ITS also verifies SDM in MODES 1 and 2 via the rod insertion limits. Any changes to the rod insertion limit requirements will be discussed in DOCs for those specifications. This change is designated as administrative because it does not result in a technical change to the specification.	3.1.1	3.1.1.1, 4.1.1.1.1.b, 3.1.3.6

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 A.4	The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, and 4 with a footnote stating, "See Special Test Exception 3.10.1." ITS 3.1.1 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the reader that a Special Test Exception exists which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative as it incorporates an ITS convention with no technical change to the Technical Specifications.	None	3.1.1.1
3.1.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
3.1.2 A.2	CTS Surveillance 4.1.1.1.2 requires the overall core reactivity balance be compared to predicted values to demonstrate agreement within +/- 1% $\Delta k/k$. ITS LCO 3.1.2 requires the measured core reactivity to be within +/- 1% $\Delta k/k$ of predicted values. This changes the CTS by replacing the Surveillance requirement with an LCO. This change is acceptable because the requirements have not changed. Converting the requirement from a Surveillance in the SHUTDOWN MARGIN specification to an LCO is consistent with the ITS format and content guidance. Any technical changed resulting from this change are discussed in other DOCs. This change is designated as administrative because it does not result in a technical change to the specification.	3.1.2	4.1.1.1.2
3.1.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 A.2	CTS 3.1.1.4 states that the maximum MTC upper limit shall be ≤ 0.6 x 10-4 Δk/k/°F below 70% RTP and ≤ 0.0 x 10^{-4} Δk/k/°/F at or above 70% RTP. ITS 3.1.3 states that the maximum MTC upper limit shall be ≤ 0.6 x 10^{-4} Δk/k/°F when < 70% RTP, and ≤ 0.0 Δk/k/°F when ≥ 70% RTP. This changes the CTS by designating the maximum MTC upper limit at ≥ 70% RTP as 0.0 Δk/k/°F instead of 0.0 x 10^{-4} Δk/k/°F. This change is acceptable because the requirements have not changed. The maximum upper limit for MTC when ≥ 70% RTP is zero. Presenting the limit as 0.0 instead of 0.0 x 10^{-4} is less confusing and consistent with how similar valves are presented in the ITS. This change is designated as administrative because it does not result in a technical change to the specification.	3.1.3	3.1.1.4
3.1.3 A.3	The Applicability of CTS 3.1.1.4 is modified by a footnote, designated "#", stating, "See Special Test Exception 3.10.3." ITS 3.1.3 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the reader that a Special Test Exception exists which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative as it incorporates an ITS convention with no technical change to the Technical Specifications.	None	3.1.1.4
3.1.3 A.4	CTS 3.1.1.4 refers to the Beginning of Cycle (BOC) MTC limit and the End of Cycle (EOC) MTC limit. ITS 3.1.3 refers to these values as the upper MTC limit and lower MTC limit, respectively. This change is acceptable because the requirements have not changed. The BOC MTC value is the most positive, upper limit and the EOC MTC value is the most negative, lower limit. The terminology used in the ITS is an editorial preference selected for consistency with that used in NUREG-1431. This change is designated as administrative as it incorporates an ITS convention with no technical change to the Technical Specifications.	3.1.3	3.1.1.4

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 A.5	CTS 3.1.1.4, Action a.1, states that if the MTC is more positive than the BOC (e.g., upper) limit, control rod withdrawal limits must be imposed within 24 hours or be in HOT STANDBY within 6 hours. ITS 3.1.3, ACTION A, states that with the MTC not within the upper limit, establish control rod withdrawal limits with 24 hours or be in MODE 2 with $K_{eff} < 1.0$ within 6 hours. This changes the CTS by requiring the plant to be in MODE 2 with $K_{eff} < 1.0$ instead of HOT SHUTDOWN (i.e.; MODE 3). This change is acceptable because the requirements have not changed. In accordance with CTS LCO 3.0.1, Actions are only required to be followed while in the mode of applicability. The CTS upper MTC limit is applicable in MODES 1 and 2 with $K_{eff} \geq 1.0$. Therefore, under the CTS, the unit does not have to enter MODE 3 because the applicability of the action ends when in MODE 2 with $K_{eff} < 1.0$. As a result, there is no difference between the CTS and ITS requirements. This change is designated as administrative because it does not result in a technical change to the specification.	3.1.3, Action A	3.1.1.4, Action a.1
3.1.3 A.6	CTS 3.1.1.4, Action a.1, states that when the MTC is more positive than the BOC limit, control rod withdrawal limits must be established. It also states, "these withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6." The ITS does not include this sentence. This change is acceptable because the requirements have not changed. The CTS reference to Specification 3.1.3.6 is an "information only" statement that neither adds, eliminates, or modifies requirements. The ITS convention is to not include these types of statements. This change is designated as administrative because it does not result in a technical change to the specification.	None	3.1.1.4, Action a.1
3.1.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
3.1.4 A.2	The Applicability of CTS 3.1.3.1 is modified by a footnote, designated "**", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.4 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the reader that a Special Test Exception exists which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.1.3.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A.3	CTS 3.1.3.1, Action c.1, states that with a maximum of one rod misaligned from the group step counter demand position by more than the alignment requirements, POWER OPERATION may continue provided that within one hour, the rod is restored to OPERABLE status within the above alignment limits, or other compensatory measures described in the specification are taken. ITS 3.1.4 does not contain a Required Action stating that the rod must be restored to OPERABLE status within the alignment limits. This change is acceptable because the technical requirements have not changed. Restoration of compliance with the LCO is always an available Required Action and it is the convention in the ITS to not state such "restore" options explicitly unless it is the only action or is required for clarity. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.1.3.1, Action c.1
3.1.4 A.4	CTS 3.1.3.1, Action c.2.e, states that with a maximum of one rod misaligned from the group step counter demand position by more than the alignment requirements, POWER OPERATION may continue provided that the remainder of the rods in the group are aligned to within +/- 12 steps of the misaligned rod within 1 hour while maintaining the thermal power, rod sequence, and insertion limits of Specification 3.1.3.6 during subsequent operation. ITS 3.1.4 does not contain a Required Action stating that the remainder of the rods in the group must be aligned with the misaligned rod. This change is acceptable because the technical requirements have not changed. Moving the remainder of the rods in a group to within the LCO limit of the misaligned rod while maintaining compliance with all other rod position requirements is simply restoring compliance with the LCO. Restoration of compliance with the LCO is always an available Required Action and it is the convention in the ITS to not state such "restore" options explicitly unless it is the only action or is required for clarity. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.1.3.1, Action c.2.e
3.1.4 A.5	CTS 3.1.3.4, Action a, states that with the rod drop time of any full length rod determined to exceed the rod drop time limit, restore the rod drop time to within limit prior to proceeding to MODE 1 or 2. CTS 3.1.3.4 is applicable in MODES 1 and 2. The ITS does not have a similar requirement. CTS 4.0.4 and ITS SR 3.0.4 require verification that Surveillances are met prior to entering the MODE in which they apply. CTS 4.0.4 and ITS SR 3.0.4 also prohibit entering a MODE or condition with the Surveillance not met and while relying on Actions. Therefore, the Action prohibiting entry into MODES 1 and 2 with the rod drop time requirements not met is redundant to CTS 4.0.4 and ITS SR 3.0.4. This change is acceptable because the technical requirements have not changed. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.1.3.4, Action a

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A.6	CTS 3.1.3.4, Action b, contains actions to follow if the rod drop times are measured with less than three reactor coolant loops in service and provide restrictions on power operation with less than all three reactor coolant loops in service. The ITS does not contain similar restrictions. This change is acceptable because operation in MODES 1 and 2 is prohibited with less than three reactor coolant loops in operation. Therefore, the options in this Action cannot be used. This change is designated as administrative as a provision of the CTS which cannot be used is eliminated	None	3.1.3.4, Action b
3.1.4 A.7	CTS 4.1.1.1.1.a and 4.1.1.2.a require verification of SHUTDOWN MARGIN within one hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. This duplicates the requirements in CTS 3.1.3.1, Action c.2 and Action c.2.b and is eliminated. CTS 4.1.1.1.1.a and 4.1.1.2.a also state that if the inoperable control rod is immovable or untrippable, the SHUTDOWN MARGIN shall be increased by the amount at least equal to the withdrawn worth of the immovable or untrippable control rod(s). The ITS definition of "SHUTDOWN MARGIN" states, "With any RCCA not capable of being fully inserted, the reactivity worth of the RCCA must be accounted for in the determination of SDM." This changes the CTS by eliminating duplicated requirements and moving information from the Specifications to the definitions. This change is acceptable because the requirements have not changed. The elimination of duplicated requirements does not affect the technical requirements of the specifications. Moving information from the specifications to the definitions does not affect the technical requirements of the specifications. This change is designated as administrative because it does not result in technical changes to the specifications.	1.1 definition of SDM	4.1.1.1.1.a and 4.1.1.2.a
3.1.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 A.2	The Applicability of CTS 3.1.3.5 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.5 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The purpose of the footnote reference is to alert the reader that Special Test Exceptions exist which may modify the Applicability of the specification. This change is acceptable because it is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative as it incorporates an ITS convention with no technical change to the Specifications.	None	3.1.3.5
3.1.5 A.3	CTS 3.1.3.5, Action b, states that power operation may continue with a maximum of one shutdown bank inserted beyond the insertion limit during surveillance testing pursuant to Specification 4.1.3.1.2 and immovable due to malfunctions in the rod control system. ITS 3.1.5, Condition B, states, in part, "One shutdown bank inserted ≤ 18 steps below the insertion limit and immovable." This changes the CTS by eliminating the qualification, "during surveillance testing pursuant to Specification 4.1.3.1.2" and immovable "due to malfunctions in the rod control system." This change is acceptable because the requirements have not changed. The shutdown banks are required to be fully withdrawn in the MODES in which the specification is applicable. The only time the shutdown banks are inserted while in the applicable MODES is during performance of the rod freedom test, CTS Surveillance 4.1.3.1.2. Therefore, stating that the malfunction occurred during that test is unnecessary. Further, ITS LCO 3.1.5 is not applicable during the rod freedom test, ITS SR 3.1.4.2, under the ITS 3.1.5 Applicability Note. Referencing the SR within the specification would be confusing. The qualification that a bank is immovable "due to malfunctions in the rod control system" is unnecessary. If a bank is immovable, it is either due to mechanical binding or a malfunction of the control rod system. If the problem is mechanical binding, the bank would not be trippable and LCO 3.1.4 would apply. This Condition can only apply during a malfunction of the rod control system. Therefore, specifying that the bank is immovable due to malfunctions in the rod control system is not necessary. This change is designated as administrative because it does not result in a technical change to the specifications	3.1.5, Condition B	3.1.3.5, Action b

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 A.4	CTS 3.1.3.5, Action b, states, in part, that "With a maximum of one shutdown bank inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT during surveillance testing pursuant to Specification 4.1.3.1.2 and immovable due to malfunctions in the rod control system, POWER OPERATION may continue provided that: . . . . 2. the affected bank is trippable, 3. each shutdown and control rod is aligned to within +/- 12 steps of its respective group step counter demand position . . ." ITS 3.1.5, Condition B, states, in part, "One shutdown bank inserted ≤ 18 steps below the insertion limit and immovable AND each control and shutdown bank within the limits of LCO 3.1.4." ITS LCO 3.1.4 requires that all shutdown and control banks be OPERABLE (which is defined as "trippable,") and individual indicated rod positions be within 12 steps of their group step counter demand position. This changes the CTS by substituting a reference to LCO 3.1.4 for the explicit requirements in the CTS action. This change is acceptable because the requirements have not changed. The CTS requirements have been rearranged. This change is designated as administrative as the technical requirements have not changed.	3.1.5, Condition B	3.1.3.5, Action b
3.1.6 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
3.1.6 A.2	The Applicability of CTS 3.1.3.6 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.6 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The purpose of the footnote reference is to alert the reader that Special Test Exceptions exist which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references as they are not required. The referenced items apply whether or not they are cross-referenced. This change is designated as administrative because it does not result in a technical change to the specifications.	None	3.1.3.6

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 A.3	CTS 3.1.3.6, Action a, states, in part, "With the control banks inserted beyond the insertion limits, except for surveillance testing pursuant to Specification 4.1.3.1.2" and CTS 3.1.3.6, Action b, states, in part, "With a maximum of one control bank inserted beyond the insertion limits specified in the CORE OPERATING LIMITS REPORT during surveillance testing pursuant to Specification 4.1.3.1.2." ITS 3.1.6, Applicability Note, states, "The LCO is not applicable while performing SR 3.1.4.2." This changes the CTS by moving the qualifications, "during surveillance testing pursuant to Specification 4.1.3.1.2" to an Applicability Note. This change is acceptable because the requirements have not changed. The only time the control banks are inserted below the insertion limits while in the applicable MODES is during performance of the rod freedom test, CTS Surveillance 4.1.3.1.2. Therefore, stating that the malfunction occurred during that test is unnecessary. Further, ITS LCO 3.1.6 is not applicable during the rod freedom test, ITS SR 3.1.4.2, under the ITS 3.1.6 Applicability Note. Referencing the SR within the specification would be confusing. This change is designated as administrative because it does not result in a technical change to the specifications.	3.1.6, Applicability Note	3.1.3.6, Actions a and b
3.1.6 A.4	CTS 3.1.3.6, Action b, states, in part, "With a maximum of one control bank inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT during surveillance testing pursuant to Specification 4.1.3.1.2 and immovable due to malfunctions in the rod control system, POWER OPERATION may continue . . ." ITS 3.1.6, Condition C, states, in part, "Control bank A, B, or C inserted ≤ 18 steps below the insertion limit and immovable." This changes the CTS by eliminating a qualification, immovable "due to malfunctions in the rod control system." Other changes to CTS 3.1.3.6, Action b, are described in DOC A.3. This change is acceptable because the requirements have not changed. The qualification that a bank is immovable "due to malfunctions in the rod control system" is unnecessary. If a bank is immovable, it is either due to mechanical binding or a malfunction of the control rod system. If the problem is mechanical binding, the bank would not be trippable and LCO 3.1.4 would apply. This Condition can only apply during a malfunction of the rod control system. Therefore, specifying that the bank is immovable due to malfunctions in the rod control system is not necessary. This change is designated as administrative because it does not result in a technical change to the specifications.	3.1.6, Condition C	3.1.3.6, Action b

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 A.5	CTS 3.1.3.6, Action b, states, in part, that "With a maximum of one control bank inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT during surveillance testing pursuant to Specification 4.1.3.1.2 and immovable due to malfunctions in the rod control system, POWER OPERATION may continue provided that: . . . . 2. the affected bank is trippable, 3. each shutdown and control rod is aligned to within +/- 12 steps of its respective group step counter demand position . . ." ITS 3.1.6, Condition C, states, in part, "One control bank inserted ≤ 18 steps below the insertion limit and immovable AND each control and shutdown bank within the limits of LCO 3.1.4." ITS LCO 3.1.4 requires that all shutdown and control banks be OPERABLE (which is defined as "trippable,") and individual indicated rod positions be within 12 steps of their group step counter demand position. This changes the CTS by substituting a reference to LCO 3.1.4 for the explicit requirements in the CTS action. This change is acceptable because the requirements have not changed. The CTS requirements have been rearranged. This change is designated as administrative as the technical requirements have not changed.	3.1.6, Condition C	3.1.3.6, Action b
3.1.6 A.6	CTS 3.1.3.6, Action a.1 and a.2 state that with the control banks inserted beyond the insertion limits, restore the control banks to within the insertion limits within two hours or reduce the THERMAL POWER within 2 hours to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the rod group step counter demand position using the insertion limits specified in the CORE OPERATING LIMITS REPORT. ITS 3.1.6, Action B.2, requires the control bank to be restored to within limits within 2 hours. This changes the CTS by eliminating the explicit statement that compliance with the LCO can be restored in order to exit the Action. This change is acceptable because the requirements have not changed. Reducing THERMAL POWER so that the insertion limits, which are a function of power, are lowered and the control bank inserted below the insertion limits comes within the limit is the same as the CTS Action a.1 option to "restore the control banks to within the insertion limit." This change is considered administrative because the technical requirements have not changed.	3.1.6, Action B.2	3.1.3.6, Action a.1 and a.2
3.1.7 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 A.2	CTS Action a.1, a.2, and b.2 require verification that the requirements of CTS 3.1.3.1 are satisfied. CTS 3.1.3.1 is equivalent to ITS LCO 3.1.4. The ITS does not contain a requirement in ITS 3.1.7 to verify that ITS LCO 3.1.5 is satisfied. This change is acceptable because the requirements have not changed. CTS specification 3.1.3.1 applies and its Actions must be followed whenever the LCO is not met. Cross-referencing between specifications is inconsistent with the ITS conventions and does not create, modify, or eliminate requirements. Specifications apply in their Applicabilities, as described in ITS LCO 3.0.1, whether or not a cross-reference exists. Therefore, elimination of the cross-referencing does not result in a technical change to the specifications. This change is designated as administrative because the technical requirements have not changed.	None	3.1.3.1, Action a.1, a.2, and b.2
3.1.7 A.3	ITS 3.1.7 Actions are modified by a Note which states, "Separate Condition entry is allowed for each inoperable rod position indicator and each demand position indicator." The CTS does not have a similar statement. This change is acceptable because the technical requirements have not changed. The CTS Actions are worded such that separate condition entry can be made. It is the ITS convention to include a Note like the one modifying the ITS 3.1.7 Actions in this condition. This change is designated as administrative because the technical requirements have not changed.	3.1.7 Actions Note	None
3.1.7 A.4	CTS 3.1.3.2 contains a Note, designated "*", which allows individual rod position indication to be up to +/- 24 steps, vice +/- 12 steps, for up to one hour per 24 hours when reactor power is ≤ 50% RTP. It contains the statement, "If either the one hour period or the +/- 24 step limit is exceeded, immediately declare the individual rod position indicator channel inoperable." The ITS does not contain a similar statement. This change is acceptable because the technical requirements have not changed. If the rod position is outside the +/- 12 step tolerance given in the CTS LCO and ITS SR 3.1.7.1 and the conditions allowing the wider 24 steps tolerance are not met, and the rod position indication is inoperable. It is unnecessary to state that the rod position indicator must be declared inoperable as the normal Use and Applicability rules require the rod position indicator to be declared inoperable if the Surveillance is not met. This change is designated as administrative because it does not result in a technical change to the specifications.	None	3.1.3.2 Note *

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 A.5	CTS 3.1.3.2.a states "Each individual rod position indicator channel, 1 per rod, accurate to within +/- 12 steps* of actual rod position." Footnote "*" states, "Below 50% power each individual rod position indicator may be more than +/- 12 steps from its group step counter demand position for a maximum of one hour in every 24. During this hour, each individual rod position indicator may be no more than +/- 24 steps from its demand position." ITS 3.1.7 states, "The Rod Position Indication (RPI) system and the Demand Position Indication System shall be OPERABLE." ITS LCO 3.1.4 states, "All shutdown and control rods shall be OPERABLE AND individual indicated rod positions shall be within 12 steps of their group step counter demand position." ITS LCO 3.1.4 is modified by a Note which states, "When THERMAL POWER is ≤ 50% RTP, the indicated position of each rod as determined by its individual rod position indicator may be within 24 steps from its group step counter demand position for up to 1 hour per 24 hours. This NOTE is not applicable for control rods known to be greater than 12 steps from the rod group step counter demand position." This changes the CTS by moving the requirement that the RPI indicate within 12 or 24 steps of the actual position to LCO 3.1.4. This change is acceptable because the technical requirements have not changed. Both the CTS and the ITS requires the RPI system to indicate the rod position within 12 steps. This change is designated as administrative because it does not result in a technical change to the specifications.	LCO 3.1.4, LCO 3.1.7	3.1.3.2.a, footnote *
3.1.8 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 A.2	CTS 3.1.1.3.2 states, "The following valves shall be locked, sealed or otherwise secured in the closed position except during planned boron dilution or makeup activities." ITS LCO 3.1.8 states, "Each valve used to isolate primary grade water flow paths shall be secured in the closed position." A Note to the LCO states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." ITS SR 3.1.8.1 states, "Verify each valve that isolates primary grade water flow paths is locked, sealed, or otherwise secured in the closed position." This change is acceptable because the technical requirements have not changed. In the ITS, requirements that valves be locked, sealed, or otherwise secured are located in the Surveillances, not the LCO. Under SR 3.0.1, the SRs provide requirements necessary to meet the LCO. Therefore, moving the requirement from the LCO to the SR has no effect on the application of the requirements. The addition of the phrase "under administrative control" to the LCO Note is consistent with the ITS conventions and does not change the application of the Note. This change is designated as administrative because it does not result in a technical change to the specifications.	LCO 3.1.8 Note, SR 3.1.8.1	3.1.1.3.2
3.1.8 A.3	CTS 3.1.1.3.2 is applicable in MODES 3, 4, 5 and 6. The CTS Action states that with the valves not locked, sealed, or otherwise secured in the closed position, suspend CORE ALTERATIONS. ITS 3.1.8 is applicable in MODES 3, 4, and 5 and does not contain this Action. This change is acceptable because CORE ALTERATIONS cannot occur in MODES 3, 4, or 5. ITS 3.9.2 provides similar requirements on primary grade water flow path in MODE 6 and that specification will address Actions in that MODE. Any technical changes in the Actions in MODE 6 will be addressed in the DOCs for that specification. This change is designated as administrative because it divides Actions according the applicable MODE with no technical change to the specifications.	None	3.1.1.3.2
3.1.9 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.9 A.2	CTS 3.10.3 states that the limitations of Specification 3.1.1.4, 3.1.3.1, 3.1.3.5, and 3.1.3.6 may be suspended during the performance of PHYSICS TESTS provided the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set ≤ 35% and ≤ 25% of RATED THERMAL POWER, respectively. Other requirements are also imposed. ITS 3.1.9 states that the requirement of LCO 3.1.3, LCO 3.1.4, LCO 3.1.5, LCO 3.1.6, and LCO 3.4.2 may be suspended, but contains no requirements on the Intermediate and Power Range Channels. The ITS contains the same requirements on the Intermediate and Power Range Channels in ITS LCO 3.3.1. This changes the CTS by eliminating the requirement that the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set ≤ 35% and ≤ 25% of RATED THERMAL POWER, respectively, from the test exception. This change is acceptable because the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are contained in LCO 3.3.1, RTS Instrumentation. Repeating that requirement in the test exception LCO is unnecessary. This change is designated administrative as it eliminates a repeated requirement from the CTS, resulting in no technical change to the Technical Specifications.	LCO 3.1.9	3.10.3
3.1.9 A.3	CTS 3.10.3 is applicable in MODE 2. ITS 3.1.9 is applicable, "During PHYSICS TESTS initiated in MODE 2." The purpose of the ITS 3.1.9 Applicability is to ensure that the Actions contained in the specification are followed. The wording of CTS 3.10.3 appears to be contradictory because when THERMAL POWER exceeds 5%, the test exception specification applicability is exited and the Actions no longer apply. However, it is clear that the CTS 3.10.3 Action should be applied if THERMAL POWER exceed 5%. The ITS Applicability eliminates this apparent contradiction and allows the test exception Conditions and Required Actions to be applied when the LCO is not met. This is consistent with the wording of the CTS Action. This change is designated as administrative because it clarifies the current wording of the specification with no change in intent.	3.1.9 Applicability	3.10.3 Applicability

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.3 L.1	CTS 3.1.1.4 Action a.3 requires that a Special Report be prepared and submitted to the NRC within 10 days if the measured MTC is more positive than the BOC limit. The Special Report must describe the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition. ITS 3.1.3 does not include this requirement.	None	3.1.1.4, Action a.3	8
3.1.3 L.2	CTS 3.1.1.4, Action a.2, states that when the measured MTC is more positive than the limit, the control rod withdrawal limits established in Action a.1 must be maintained until subsequent measurement verifies that the MTC has been restored to within its limits for the all rods withdrawn condition. ITS 3.1.3 does not contain a requirement that the control rod withdrawal limits be maintained until MTC is confirmed to be within its limit by measurement. However, LCO 3.0.2 states that the Required Actions shall be followed until the LCO is met or no longer applicable. The ITS Bases state that physics calculations may be used to determine the time in cycle life at which the calculated MTC will meet the LCO requirement and at this point in core life, the condition may be exited and the control rod withdrawal limits removed. This changes the CTS by eliminating the Surveillance Requirement verifying the MTC to be within its limit before removing the control rod withdrawal limits.	None	3.1.1.~~3~~4, Action a.2	5

EDITORIAL

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category	
3.1.4 L.1	CTS LCO 3.1.3.1 states, "All shutdown and control rods shall be OPERABLE and positioned within +/- 12 steps of their group step counter demand position." CTS 3.1.3.1, Action c.2~~)~~, states that a misaligned rod must be declared inoperable. ITS LCO 3.1.4 states, "All shutdown and control rods shall be OPERABLE AND Individual indicated rod position shall be within 12 steps of their group step counter demand position." This changes the CTS by considering shutdown and control rods that are trippable but misaligned to be OPERABLE. The term "untrippable" in CTS 3.1.3.1, Action a, is replaced with "inoperable" and the requirement to declare a misaligned rod inoperable in CTS 3.1.3.1, Action c.2, is deleted.	LCO 3.1.4	3.1.3.1 and 3.1.3.1, Action c.2~~)~~	1	EDITORIAL
3.1.4 L.2	CTS 3.1.3.1, Actions a, b, c.2, and c.2.b~~)~~ require satisfying the SHUTDOWN MARGIN requirement in accordance with Specification 3.1.1.1. In the same conditions, ITS 3.1.4 requires verification that the SHUTDOWN MARGIN is within the limit provided in the COLR or initiating boration to restore SDM to within the limit. This changes the CTS by providing the option to initiate action to establish compliance with the SDM requirement within 1 hour instead of declaring the Required Action not met and following LCO 3.0.3. The change from referencing Specification 3.1.1.1 to referencing a value in the COLR is discussed in DOC LA.1.	3.1.4, Action A.1.1	3.1.3.1, Actions a, b, c.2, and c.2.b~~)~~	4	EDITORIAL
3.1.4 L.3	CTS 3.1.3.1, Action c.2.a~~)~~, states that when a rod is misaligned, POWER OPERATION may continue if a reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days. This re-evaluation shall confirm that the previous analyzed results of these accidents remain valid for the duration of operation under these conditions. ITS 3.1.4, Condition B, states that when one rod misaligned, re-evaluate the safety analyses and confirm results remain valid for the duration of operation under these conditions. This changes the CTS by eliminating Table 3.1-1, which lists the specific events to be re-evaluated, and the Action to evaluate those specific events.	3.1.4, Condition B	3.1.3.1, Action c.2.a~~)~~ and Table 3.1-1	4	EDITORIAL

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category	
3.1.4 L.4	CTS 3.1.3.1, Action c.2.d,~~)~~ states that with one rod misaligned, reduce the THERMAL POWER level to ≤ 75% of RATED THERMAL POWER within one hour. ITS 3.1.4, Required Action B.2.1, requires THERMAL POWER to be reduced to ≤ 75% RTP within 2 hours. This changes the CTS by changing the Completion Time from one hour to two hours.	3.1.4, Required Action B.2.1	3.1.3.1, Action c.2.d~~)~~	3	EDITORIAL
3.1.4 L.5	CTS 3.1.3.1, Action c.2.d,~~)~~ states that with one rod misaligned, reduce the THERMAL POWER level to ≤ 75% of RATED THERMAL POWER and reduce the high neutron flux trip setpoint to ≤ 85% of RTP within the next 4 hours. ITS 3.1.4, Required Action B.2.1, requires THERMAL POWER to be reduced to ≤ 75% RTP, but does not require the high neutron flux trip setpoint to be reduced. This changes the CTS by eliminating the Required Action to reduce the high neutron flux trip setpoint.	3.1.4, Required Action B.2.1	3.1.3.1, Action c.2.d~~)~~	4	EDITORIAL
3.1.4 L.6	CTS 4.1.3.4 requires the rod drop time of full length rods to be demonstrated through measurement prior to reactor criticality for specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods. The ITS does not include this testing requirement.	None	4.1.3.4	5	
3.1.4 L.7	CTS 4.1.3.4 requires the rod drop time of full length rods to be demonstrated through measurement prior to reactor criticality at least once per 18 months. The ITS does not include this testing requirement.	None	4.1.3.4	7	

Change Category:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation Of Surveillance Requirement Acceptance Criteria
7 - Relaxation Of Surveillance Frequency
8 - Deletion of Reporting Requirements

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
		following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.2.1 requires comparison of the actual and predicted core reactivity balance but does not describe the factors that must be considered in the calculation. This information is relocated to the Surveillance Bases. This changes the CTS by removing details on how the core reactivity balance comparison calculation is performed from the specifications and placing the information in the Bases.			
3.1.3 None	N/A	N/A	N/A	N/A	N/A
3.1.4 LA.1	3.1.3.1, Actions a, b, c.2, and c.2.b)	CTS 3.1.3.1, Actions a, b, c.2, and c.2.b) require satisfying the SHUTDOWN MARGIN requirement in accordance with Specification 3.1.1.1. In the same conditions, ITS 3.1.4 requires verification that the SHUTDOWN MARGIN is within the limit provided in the COLR. This changes the CTS by relocating the SHUTDOWN MARGIN value to be met from the specifications to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.1.5 None	N/A	N/A	N/A	N/A	N/A
3.1.6 None	N/A	N/A	N/A	N/A	N/A
3.1.7 None	N/A	N/A	N/A	N/A	N/A
3.1.8 LA.1	Unit 2 3.1.1.3.2 Action	Unit 2 CTS 3.1.1.3.2 Action states that with the primary grade water flow path isolation valves not locked, sealed, or otherwise secured in the closed position, verify the SHUTDOWN MARGIN is greater than or equal to 1.77%	COLR	ITS 5.6.5, Core Operating Limits Report	5

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Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
		and is not credited for mitigation of any design basis accident or transient. Other specifications in the ITS contains adequate controls to ensure that RCS flow meets the general accident analysis assumption. In MODES 1, 2, and 3, at least one Reactor Coolant Pump (RCP) is required to be in operation, which provides flow in excess of 3000 gpm. In MODE 4, either an RCP or Residual Heat Removal (RHR) train is required to be in operation, and in MODES 5 and 6, at least one RHR train is required to be in operation. The ITS Bases state that when an RHR train is required to provide RCS flow, the flow rate must be sufficient for decay heat removal and boron mixing. The LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.			
CTS 3.1.3.3 R.1	3.1.3.3	CTS 3.1.3.3 provides requirements on the rod position indicator channels during shutdown (MODES 3, 4, and 5 with the reactor trip system breakers in the closed position). The control rod position indicator channels provide indicator of rod position to the operator. This indicator is used by the operator to verify that the rods are correctly positioned, and to verify the rods are inserted into the core following a reactor trip. Rod position indicator is also used during reactor startup. However, no DBA or Transient initiated in MODES 3, 4, or 5 with the reactor trip system breakers in the closed position assumes operator action to manually trip the reactor or to take some alternative action if an automatic reactor trip does not occur. With the reactor critical, rod position indicator is used to verify that the insertion, sequence, and overlap limits are met. These are related to SHUTDOWN MARGIN and core power distribution limits. This LCO does	Technical Requirements Manual	10 CFR 50.59	N/A

INADVERTENTLY OMITTED

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
		not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.				
CTS 3.1.2.1 R.1	3.1.2.1	CTS 3.1.2.1 provides requirements on the boration systems flow paths during shutdown. The boration systems are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The boration system is not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED
CTS 3.1.2.2 R.1	3.1.2.2	CTS 3.1.2.2 provides requirements on the boration systems flow paths during operation. The boration systems are part of the Chemical and Volume Control System (CVCS) and provides the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The boration system is not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. The Emergency Core Cooling System (ECCS) and Refueling Water Storage Tank are credited in the accident analyses. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
		Technical Requirements Manual.				
CTS 3.1.2.3 R.1	3.1.2.3	CTS 3.1.2.3 provides requirements on the charging pumps during shutdown when used as part of the boration system. The charging pumps in the boration system are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The charging pumps in the boration system are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. OPERABILITY of the charging pumps is required as part of the Emergency Core Cooling System, which is addressed in other specifications. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED
CTS 3.1.2.4 R.1	3.1.2.4	CTS 3.1.2.4 provides requirements on the charging pumps during operation when used as part of the boration system. The charging pumps in the boration system are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The charging pumps in the boration system are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. The Emergency Core Cooling System (ECCS) is and Refueling Water Storage Tank are credited in the accident analyses. In the case of the boron	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
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5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
		dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. OPERABILITY of the charging pumps is required as part of the Emergency Core Cooling System, which is addressed in other specifications. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.				
Unit 1 CTS 3.1.2.5 R.1	Unit 1 3.1.2.5	Unit 1 CTS 3.1.2.5 provides requirements on the boric acid transfer pumps during shutdown. The boric acid transfer pumps are part of the Chemical and Volume Control System (CVCS) and provides the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The boric acid transfer pumps are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED
Unit 1 CTS 3.1.2.6 R.1	Unit 1 3.1.2.6	Unit 1 CTS 3.1.2.6 provides requirements on the boric acid transfer pumps during operation. The boric acid transfer pumps are part of the Chemical and Volume Control System (CVCS) and provides the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The boric acid transfer pumps are not assumed to be OPERABLE to mitigate the	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
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5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
		consequences of a design basis accident or transient. The Emergency Core Cooling System (ECCS) and Refueling Water Storage Tank are credited in the accident analyses. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.				
CTS 3.1.2.7 R.1	3.1.2.7	CTS 3.1.2.7 provides requirements on the borated water sources during shutdown. The borated water sources - shutdown are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The borated water sources are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED
CTS 3.1.2.8 R.1	3.1.2.8	CTS 3.1.2.8 provides requirements on the borated water sources during operation. The borated water sources - operating are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The borated water	Technical Requirements Manual	10 CFR 50.59	N/A	INADVERTENTLY OMITTED

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
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DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
		sources are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. The Emergency Core Cooling System (ECCS) and Refueling Water Storage Tank are credited in the accident analyses and are required by other specifications. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.			

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various
3.2.1 A.2	CTS 3.2.2 provides the limit for FQ(Z). The LCO provides two equations, which give the FQ(Z) limit for power > 50% RTP and power This change is acceptable because the technical requirements have not changed. CTS Surveillance 4.2.2.2 states "FQM(Z) shall be evaluated to determining if FQ(Z) is within limit by: . . . c. Satisfying the following relationship" and provides two equations. These equations for FQM(Z) are always more limiting than the equations presented in the LCO. Under CTS 4.0.1 and ITS SR 3.0.1, failure to meet the SR results in failure to meet the LCO. Therefore, the equations presented in the LCO are never limiting. In the ITS, the equations presented in the CTS Surveillance 4.2.2.2 are used to establish the LCO limit. This change is designated as administrative because it eliminates information from the CTS that is not used.	None	3.2.2
3.2.1 A.3	CTS 3.2.2 provides a limit for FQ(Z). The Actions for CTS 3.2.2 apply when FQ(Z) exceeds its limit. ITS 3.2.1 states, "FQ(Z), as approximated by FQM(Z), shall be within the limit specified in the COLR." The ITS Condition is, "FQM(Z) not within limit." ITS SR 3.2.1.1 requires verification that FQM(Z) is within its limit. This changes the CTS by stating the limited value as FQM(Z) instead of FQ(Z). This change is acceptable because the requirements have not changed. CTS SR 4.2.2.2, which is used to determine if FQ(Z) is within its limit, is written in terms of the measured FQ(Z), given as FQM(Z). The value used to determine if FQ(Z) is within its limit in CTS SR 4.2.2.2.c is FQM(Z). Therefore, the ITS use of FQM(Z) is consistent with the CTS limits. This change is designated as administrative because it does not result in a technical change to the specifications.	3.2.1	3.2.2

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A.4	CTS 4.2.2.1 states, "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement. The purpose of a Specification 4.0.4 exception is to allow the plant to enter the MODE of applicability without performing the required Surveillances. This change is acceptable because the CTS Specification 4.0.4 exception is not used. CTS 4.2.2.2 is modified by a Note which states, "During power escalation, the power level may be increased until a power level for extended operation has been achieved and a power distribution map obtained." Therefore, the CTS Surveillance Note provides the allowance to enter MODE 1 and increase power without performing the Surveillance. This serves the same purpose as the Specification 4.0.4 exception. The ITS does not need the exception because ITS Surveillance 3.2.1.1 contains the same Note as the CTS Surveillance. This change is designated as administrative because it eliminates a CTS provision which is not used.	None	4.2.2.1
3.2.1 A.5	ITS 3.2.1, Action A.2.1, A.2.2, and A.2.3 state that the Required Actions must be taken "after each FQM(Z) determination." CTS 3.2.2, Action a, does not explicitly state this requirement. This change is acceptable because it does not result in a technical change to the specifications. The CTS is understood to apply after each measurement of FQM(Z). This change is designates as administrative because it does not result in a technical change to the CTS.	3.2.1, Required Actions A.2.1, A.2.2, A.2.3.	3.2.2, Action a
3.2.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 A.2	CTS 3.2.3, Action c states that with FNΔH exceeding its limit, identify and correct the cause of the out of limit condition prior to increasing THERMAL POWER above the reduced limit; subsequent POWER OPERATION may proceed provided that FNΔH is demonstrated through in-core mapping to be within its limit. ITS 3.2.2, Action A, states that SR 3.2.2.1 shall be performed. SR 3.2.2.1 requires measurement of FNΔH. This changes the CTS by eliminating the statement that the cause of the out of limit condition must be identified and corrected prior to increasing power and the statement that FNΔH must be demonstrated through incore mapping. This change is acceptable because the requirements have not changed. Stating that the cause of the FNΔH limit violation must be identified and corrected prior to increasing power (i.e., exiting the Action which required power reduction) is unnecessary. Restoration of compliance with the LCO is always an option and allows exiting the Action per ITS 3.0.2. Therefore, it does not have to be stated. Stating that FNΔH must be measured with the incore mapping system is unnecessary, as FNΔH can only be measured with the incore mapping system. Therefore, stating that FNΔH must be measured (by invoking SR 3.2.2.1) means that the incore mapping system must be used. This change is designated as administrative because it does not result in technical changes to the specifications.	3.2.2, Action A, SR 3.2.2.1	3.2.3, Action c
3.2.2 A.3	CTS 3.2.3, Action c, states that with FNΔH exceeding its limit, FNΔH must be measured prior to exceeding 50% RTP, 75% RTP, and within 24 hours of exceeding 95% RTP. ITS 3.2.2, Action A.4, contains the same requirements. ITS 3.2.2, Action A.4, is modified by a Note which states, "THERMAL POWER does not have to be reduced to comply with this Required Action." This modifies the CTS by adding a Note stating that THERMAL POWER does not have to be reduced to comply with the Action. This change is acceptable because the requirements have not changed. The Note is included in the ITS to make clear that THERMAL POWER does not have to be reduced to perform the Action. For example, if FNΔH exceeded its limit and power was reduced to 60% RTP before FNΔH is demonstrated to be within its limit, under the Note THERMAL POWER does not have to be reduced to less than 50% RTP for a FNΔH measurement. FNΔH must be measured prior to exceeding 75% RTP and within 24 hours of exceeding 95% RTP. The Condition A is needed because the ITS contains a Note on ITS 3.2.3, Condition A, which states, "Required Actions A.3 and A.4 must be completed whenever Condition A is entered." The Condition A Note does not exist in the CTS and could be construed as requiring THERMAL POWER to be reduced to comply with Action A.4. The Condition A Note is described in DOC M.1. As a result, the Action A.4 Note makes the ITS and CTS actions consistent. This change is designated as administrative because it does not result in technical changes to the specifications.	3.2.2, Action A.4	3.2.2, Action c

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 A.4	CTS 4.2.3.1 states that FNΔH shall be determined to be within its limit by using the moveable incore detectors to obtain a power distribution map. ITS SR 3.2.2.1 states that FNΔH shall be verified to be within the limits specified in the COLR. This changes the CTS by eliminating the statement that FNΔH must be determined by using the moveable incore detector system to obtain a power distribution map. This change is acceptable because the requirements have not changed. Stating that FNΔH must be measured by using the incore mapping system to obtain a power distribution map is unnecessary, as FNΔH can only be measured with the incore mapping system to create a power distribution map. Therefore, eliminating a statement of the method that must be used to measure FNΔH does not change the specifications. This change is designated as administrative because it does not result in technical changes to the specifications.	SR 3.2.2.1	4.2.3.1
3.2.2 A.5	CTS 4.2.3.1.c states, "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement. The purpose of a Specification 4.0.4 exception is to allow the plant to enter the MODE of applicability without performing the required Surveillances. This change is acceptable because the CTS Specification 4.0.4 exception is not required in the ITS. CTS 4.2.3.1 is required to be performed prior to operation above 75% RTP after each fuel loading and once per 31 EFPD. Without the SR 4.0.4 exception, MODE 1 could not be entered without a measurement because the "once per 31 EFPD" Frequency would be violated under SR 4.0.4 because Surveillances must be met prior to entering the MODE of applicability. However, under the ITS, the Frequency "Once after each refueling prior to THERMAL POWER exceeding 75% RTP AND 31 EFPD thereafter," means that the 31 EFPD Frequency does not apply until after the 75% RTP measurement is performed. Therefore, the applicability of the SR is changed and MODE 1 can be entered without the SR being met. This change is designated as administrative because it does not result in technical changes to the specifications.	None	4.2.3.1
3.2.3 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.3 A.2	CTS 3.2.1, Action a, states that with AFD outside its limit, restore the indicated AFD to within its limit within 15 minutes or reduce THERMAL POWER to less than 50% RTP within 30 minutes. ITS 3.2.3, Condition A, states that with AFD not within limits, reduce THERMAL POWER to less than 50% within 30 minutes. This changes the CTS by eliminating the action to restore AFD within its limit within 15 minutes. This change is acceptable because the technical requirements have not changed. If AFD is not restored to within its limit within 15 minutes, no CTS Actions apply except to reduce power to less than 50% RTP within 30 minutes. Therefore, the action to restore AFD to within its limit within 15 minutes contains no requirement to take action. Both the CTS and the ITS require power to be reduced to less than 50% RTP within 30 minutes if AFD is not restored to within its limit. This change is designated as administrative because it does not result in a technical change to the specifications.	3.2.3, Condition A	3.2.1, Action a
3.2.3 A.3	CTS 3.2.1, Action b, states, "THERMAL POWER shall not be increased above 50% of RATED THERMAL POWER unless the indicated AFD is within the limits specified in the CORE OPERATING LIMITS REPORT." ITS 3.2.3 does not contain a similar requirement. This changes the CTS by eliminating a prohibition in the CTS. This change is acceptable because the requirements have not changed. CTS 3.0.4 and ITS LCO 3.0.4 prohibit entering the MODE of applicability of a specification unless the requirements of the LCO are met. CTS 3.2.1 and ITS 3.2.3 are applicable in MODE 1 with THERMAL POWER the Use and Application rules in the CTS and the ITS prohibit exceeding 50% of RATED THERMAL POWER without the LCO requirements met. CTS 3.2.1, Action b, is duplicative of CTS 3.0.4 and ITS LCO 3.0.4 and its elimination does not make a technical change to the specifications. This change is designated as administrative because it does not result in a technical change to the specifications.	None	3.2.1, Action b
3.2.4 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	None	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 A.2	The Applicability of CTS 3.2.4 is modified by a footnote, designated "*", stating, "See Special Test Exception 3.10.2." ITS 3.2.4 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the reader that a Special Test Exception exists which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.2.4, footnote *
3.2.4 A.3	CTS 3.2.4, Action a.1.a (Unit 1) states that with QPTR > 1.02, within 2 hours reduce the QPTR to within its limit. CTS 3.2.4, Action a.1(a) and 2.a state that with QPTR > 1.02, calculate QPTR at least once per hour until QPTR is within its limit and within 2 hours reduce QPTR to within its limit. ITS 3.2.4 does not contain a Required Action stating QPTR must be calculated at least once per hour and QPTR must be reduced to within its limit. This change is acceptable because the technical requirements have not changed. Restoration of compliance with the LCO is always an available Required Action and it is the convention in the ITS to not state such "restore" options explicitly unless it is the only action or is required for clarity. Monitoring a parameter that is outside its limit in order to determine if it has been restored to within its limit is a necessary action which must occur whether or not it is explicitly required by the TS. This change is designated as administrative because it does not result in technical changes to the specifications.	None	3.2.4, Action a.1.(a) and 2.a (Unit 1)

Table R – Relocated Specifications and Removed Details
ITS Section 3.3 – Instrumentation

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category	
3.3.1 LA.1	4.3.1.1.2	CTS Surveillance Requirement 4.3.1.1.2 requires the RTS trip functions to be response time tested. This requirement includes the following, "Response of the neutron flux signal portion of the channel time shall be measured from the detector output or input of the first electronic component in the channel." ITS SR 3.3.1.16 requires RESPONSE TIME testing of the RTS functions. This changes the CTS by moving the descriptive wording on how to measure neutron flux for channel response times from the ~~Specifications~~TS to the ITS Bases	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3	EDITORIAL BY NRC
3.3.1 LA.2	3.3.1.1 Note (d)	CTS 3.3.1.1 requires two Source Range channels be OPERABLE in MODE 2 [##]. The note [##] states that the high voltage to detector may be de-energized above P-6. ITS requirement for the Source Range channel state that two channels must be OPERABLE in MODE 2[(d)]. Note [(d)] specifies, "Below the P-6 (Intermediate Range Neutron Flux) interlock" and maintains the intent of the CTS requirement. This changes the CTS by moving the allowance that the high voltage detector may be de-energized above P-6 from the ~~Specifications~~TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1	EDITORIAL BY NRC
3.3.1 LA.3	Table 3.3-1	Reactor Trip System Interlocks or "P" functions are required to be OPERABLE in CTS Table 3.3-1. These functions are designated as P-6, P-7, P-8, P-10, and P-13. Descriptive information about the reactor trip logic enable setpoints is contained in the Condition, Function, and Setpoint columns for the interlocks. ITS 3.3.1 does not include this information in the ~~Specifications~~TS. This changes the CTS by moving the information from the ~~Specification~~TS~~s~~ to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2	EDITORIAL BY NRC

Change Category:
1 - Removing Details of System Design and System Description, Including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report