

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 SpecificationsTS to the ITS Bases	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
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 <sup>##</sup> . The note <sup>##</sup> 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 <sup>(d)</sup> . Note <sup>(d)</sup> 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 SpecificationsTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
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 SpecificationsTS. This changes the CTS by moving the information from the SpecificationTSs to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2

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3.3.1 LA.4	Table 4.3-1	<p>CTS Table 4.3-1 contains surveillance requirements with Notes which provide information on the undervoltage and shunt trip circuits testing of the Reactor Trip Breakers (RTBs) and for the RTB bypass breakers in testing the automatic undervoltage trip during CHANNEL FUNCTIONAL TEST. <del>ITS SR 3.3.1.4 for the RTBs and bypass RTBs does not contain this information. ITS retains the necessary SRs for the RTB and bypass RTB to be OPERABLE. The information is contained in the Bases for SR 3.3.1.14. This changes the CTS by moving the descriptive information from the Specifications to the ITS Bases.</del> The descriptive information to be moved is: CTS Note 8 “. . . shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip circuit(s).” CTS Note 10 “Automatic undervoltage trip.” CTS Note 11 “. . . shall independently verify the OPERABILITY of the undervoltage and shunt trip attachment of the Reactor Trip Breaker.” This information is contained in the Bases sections for SR 3.3.1.4 and SR 3.3.1.14. ITS retains the necessary SRs for the RTB and bypass RTB to be OPERABLE. This changes the CTS by moving the descriptive information from the <del>Specifications</del>TS to the ITS Bases.</p>	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

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3.3.1 LA.5	Table 2.2-1	CTS Table 2.2-1 for the Limiting Safety System Settings states specifies the formulas for Overtemperature and Overpower $\Delta T$ functions. ITS 3.3.1 in Table 3.3.1 – 1 lists the formulas for the Overtemperature and Overpower $\Delta T$ functions with a reference in each that the specific variables are contained in the Core Operating Limits Report (COLR). This changes the CTS by relocating specific parameters for the Overtemperature and Overpower $\Delta T$ functions from the Technical Specifications to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.3.1 LA.6	Table 4.3-1 NOTE 12	CTS 3.3.1.1 Surveillance Requirement in Table 4.3-1 for the Intermediate Range channels requires a CHANNEL CHECK on a refueling basis, and shown by the designation of R <sup>(12)</sup> . Note 12 states, in part, “verification that the Permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window.” The requirement of verification for P-6 and P-10 is retained in ITS SR 3.3.1.8. This changes the CTS by moving the requirement of “observation of the permissive annunciator window,” from the Specification to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

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3.3.1 LA.7	2.2.1 Action	CTS 2.2.1 Action states, “with the RTS instrumentation setpoint less conservative than the Allowable Value, the instrumentation channel must be declared inoperable.” With the channels inoperable, the applicable Action of ITS 3.3.1.1 shall be entered, and the channel’s trip setpoint shall be adjusted to be consistent with the Trip Setpoint value to return the instrument to OPERABLE status. The information provides no specific requirement for each function, but only describes the mechanics of how to adjust the channel to provide the required reactor protection. This changes the CTS by moving the information relating to the Trip Setpoint from the Specifications to the ITS 3.3.1 Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2,3
3.3.1 LA.8	Table 2.2-1 footnote	CTS 2.2.1 in Table 2.2-1 provides in a footnote for Loss of Flow function, that the design flow per loop is one-third of the minimum setpoint allowable value RCS total flow rate requirement. The minimum flow rate requirement is stated in CTS Table 3.2-1. The CTS Allowable Value for Loss of Flow is stated in % of design flow per loop. ITS 3.3.1 does not include this information on design flow rate. This changes the CTS by moving the design information from the Specifications to the COLR, and using the indicated flow rate for the Allowable Value in ITS 3.3.1.	COLR	ITS 5.6.5, Core Operating Limits Report	5

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3.3.1 LA.9	Table 2.2-1 Note 2	CTS Table 2.2-1 Note 2 provides the calculation for the Overpower $\Delta T$ setpoint, Functional Unit 8. This states that the function generated by the rate lag controller for $T_{ave}$ dynamic compensation is given by the formula for $\tau_3$ ( $\tau_3 = S/1 + \tau_3 S$ ). Also specified is the time constant utilized in the rate lag controller for $T_{ave}$ . ITS 3.3.1 Function 7, the Overpower $\Delta T$ formula does not include this information. This changes the CTS by moving the OPAT design information from the Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.1 LA.10	Table 2.2-1	CTS requirements stated in Table 2.2-1 for functions 13 and 14 describes the span of the instrument used to measure steam generator level to provide the trip setpoint and allowable value. ITS Table 3.3.1 does not include this information. This changes the CTS by moving the information for the function from the Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.11	Tables 2.2-1 and 3.3-1	The CTS lists in Tables 2.2-1 and 3.3-1 Allowable Values and Trip Setpoints. ITS 3.3.1 does not specify the Trip Setpoints. This changes the CTS by moving the Trip Setpoint from the Specifications to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3

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3.3.1 LA.12	Table 4.3-1 NOTE 9	CTS surveillance requirement listed in Table 4.3-1 for the reactor bypass breaker states a Frequency of "M (9)." This requires the monthly testing of the bypass breaker in conjunction the RTS testing. Note 9 states, "Local manual shunt trip the reactor trip bypass breaker immediately after placing the bypass breaker into service, but prior to commencing reactor trip system testing or reactor trip breaker maintenance." ITS 3.3.1.4 is required to be performed on the RTB bypass breaker every 31 days on a STAGGERED TEST BASIS. This test would be required when the associated train of RTS is tested or that train RTB requires maintenance. This changes the CTS by moving the note explaining when to conduct a local manual shunt trip test from the SpecificationsTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.13	Table 4.3-1 Note 13	CTS Table 4.3-1 states in Note 13 to the Intermediate Range Surveillance Requirements that the detector plateau curves shall be obtained and evaluated on an R (refueling) Frequency. ITS Table 3.3.1-1 states Function 4 Intermediate Range that SR 3.3.1.11 is required. <del>The SR required Frequency is 18 months.</del> This changes the CTS by moving the requirement for performing detector plateau curves from the SpecificationsTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.14	Table 2.2-1	CTS Table 2.2-1 states the Allowable Value for Function 11 Pressurizer Water Level – High is "93 % of instrument span." ITS Table 3.3.1-1 lists the Allowable Value for Function 9 Pressurizer Water Level – High is "93%." This changes the CTS by moving the design a portion of the requirement "of instrument span," from the SpecificationsTS to the UFSAR.	UFSAR	10 CFR 50.59	1

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DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.15	Table 2.2-1	CTS Table 2.2-1 for Reactor Trip System (RTS) instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.1-1 states the channel requirement for each RTS function as, "REQUIRED CHANNELS." This changes the CTS by stating all of the channel requirements for each function as the required channels and moving the information of the number of channels to trip and the minimum channels needed to maintain the function OPERABLE to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.1 LA.16	Table 3.3-1 Action 2.d	CTS 3.3.1.1 Action 2.d in Table 3.3-1 states that the QUADRANT POWER TILT RATIO (QPTR) shall be determined to be within limit when reactor power is above 75 percent of RATED THERMAL POWER (RTP). The moveable incore detectors will be utilized to verify the QPTR when a Power Range Channel is inoperable. In this condition, the normalized symmetric power distribution is determined by either utilizing 2 sets of 4 symmetric thimble locations or a full core flux map. Every 12 hours, the results of the flux map must be compared with the indicated QPTR for consistency. The indicated QPTR is provided by the three Power Range Channels that remain OPERABLE. ITS 3.3.1 Action D.2.2 requires the performance of ITS SR 3.2.4.2, which verifies the QPTR is within its limit. This changes the CTS by moving the details of <del>determining</del> how to determine QPTR from the <del>specification</del> to the ITS Bases for SR 3.2.4.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

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3.3.1 LA.17	Table 2.2-1 Note 1	CTS Table 2.2-1 Functional Unit 7 states the requirement for the Overtemperature (OT) $\Delta T$ as Note 1. The Allowable Value for the function is calculated with the application of Note 3 to Note 1. A portion of Note 1 states that the gains set for the equation are selected based on measured instrument response obtained during plant startup testing. ITS Table 3.3.1-1 Function 6 requires the OT $\Delta T$ Allowable Value to be calculated via the formula stated in ITS Note 1. Note 1 in the ITS combines the CTS Notes 1 and 3 with modifications. ITS Note 1 does not contain the requirement “with gains to be selected based on measured instrument response during plant startup tests . . .” This changes the CTS by moving the information of the gain selection from the <del>specification</del> TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.2 LA.1	LCO 3.3.2.1 and Action a	CTS LCO 3.3.2.1 and Action a contain information about the ESFAS channels and interlocks setpoint requirements. The LCO states the setpoint will be set consistent with the Trip Setpoints listed in Table 3.3-4. Action a requires the setpoint to be set more conservatively than the value listed in the Allowable Value column of the same table in order for the function to be considered OPERABLE. ITS 3.3.2 does not contain this information. DOC LA.8 describes the relocation of the setpoint values to the Technical Requirements Manual (TRM). This changes the CTS by moving the information about determining trip setpoints consistent with the setpoint methodology from the <del>Specification</del> TS to the TRM. <del>ITS Bases.</del>	<del>Bases</del> Technical Requirements Manual	<del>ITS 5.5.13,</del> Technical Specifications Bases Control Program 10 CFR 50.59	3

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3.3.2 LA.2	Table 4.3-2 NOTE (2)	CTS Table 4.3-2 specifies a requirement to perform a CHANNEL FUNCTIONAL TEST for the automatic actuation logic on various ESF functions on a monthly basis. The frequency (M) is modified by notation (2) which states, "Each train or logic channel shall be functionally tested at least every other 31 days up to and including input coil continuity testing to the ESF slave relays." ITS SRs 3.3.2.2 and 3.3.2.3 require the performance of the ACTUATION LOGIC TEST and the MASTER RELAY TEST every 31 days on a STAGGERED TEST BASIS. This changes the CTS by moving the requirement that the testing include input coil continuity testing to the ESF slave relays information from the SpecificationTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.3	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4, item 6.c, for the Allowable Values requirement contains information relating to the Steam Generator (SG) Water Level – Low Low trip. The requirement states that the Allowable Value is associated with the narrow range instrumentation span for each SG. ITS Table 3.3.2-1 (item 6.c) lists the requirements for the SG Water Level – Low Low Allowable Value but does not contain the information about the narrow range instrumentation span. This changes the CTS by moving the information about the narrow range instrumentation span from the SpecificationTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.4	Table 3.3-3	CTS LCO 3.3.2.1 in Table 3.3-3 for the ESFAS interlocks P-11 and P-12 contains information in the Condition and Function sections which describes how the interlocks function. ITS Table 3.3.2-1 lists the functions and the necessary requirements to ensure OPERABILITY. This changes the CTS by moving the description about how the interlocks function information from the SpecificationTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

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3.3.2 LA.5	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4 for the ESFAS instrumentation trip setpoints contains information describing the bus that is monitored to detect a station blackout. ITS Table 3.3.2-1 does not contain this information. This changes the CTS by moving the information describing the bus that is monitored to detect a station blackout from the SpecificationTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.6	Table 4.3-2 Note 3	Note 3 of CTS 3.3.2.1 Table 4.3-2 for the ESFAS containment pressure instrumentation surveillance requirement states that the CHANNEL FUNCTIONAL TEST shall include exercising the transmitter by applying either a vacuum or pressure to the appropriate side of the transmitter. ITS Table 3.3.2-1 for the testing of Containment pressure requires SR 3.3.2.4 to be performed. This changes the CTS by moving the information on how to conduct the SR from the SpecificationTS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.2 LA.7	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4 item 5.a for the Allowable Value requirement contains information relating to the Steam Generator (SG) Water Level – High High trip. This states that the Allowable Values are associated with the narrow range instrumentation span for each SG. ITS Table 3.3.2-1 (item 5.a) lists the requirements for the SG Water Level – High High Allowable Values but does not contain the information about the narrow range instrumentation span. This changes the CTS by moving the information about the narrow range instrumentation span from the SpecificationTS to the ITS Bases	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

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3.3.2 LA.8	Table 3.3 – 3	CTS requirement listed in Table 3.3 – 3, for each ESFAS interlock function, an Allowable Value and a Setpoint column. ITS Table 3.3.2-1 includes only an Allowable Value column. This changes the CTS by moving the pressure setpoint setting <del>Setpoint information from the Specification</del> TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.2 LA.9	4.3.2.1.2	<del>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 additionally states, “one channel per function (will be tested) such that all channels 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.” This changes the CTS by moving the information from the Specification</del> TS to the ITS Bases. Not used.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.2 LA.10	Table 3.3-3 Action 22	CTS Action 22 for Table 3.3-3 requires for applicable instrumentation channels that, “With less than the Minimum Channels OPERABLE, within one hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition.” ITS 3.3.2 in Table 3.3.2-1 for Action J requires, “One or more channels inoperable, verify interlock is in required state for existing unit condition within one hour.” The allowance provided by “determine by observation of the associated permissive annunciator window(s)” is not included in the ITS. This changes the CTS by moving the information for how to conduct the required testing from the <del>Specification</del> TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

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3.3.2 LA.11	Table 3.3-3	CTS requirements in Table 3.3-3 for function 2.a, Containment Spray Manual, lists the total number of channels as 2 sets 2 switches/set. ITS 3.3.2 Table 3.3.2-1 for function 2.a, Containment Spray Manual Actuation, states the channel requirements as 2 per train/2 trains. This changes the CTS by moving the channel information from the Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.12	Table 3.3-3	CTS Table 3.3-3 for Engineered Safety Feature Actuation System Instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.2-1 states the channel requirement for each ESFAS function as, "REQUIRED CHANNELS." This changes the CTS by stating all of the channel requirements for each function as the required channels and moving the information of the number of channels to trip and the minimum channels needed to maintain the function OPERABLE to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.3 LA.1	LCO 3.6.4.1 NOTE, 4.6.4.1 NOTE	CTS LCO 3.6.4.1 states two independent containment hydrogen analyzers (shared with the other unit) shall be OPERABLE. Notes to CTS 3.6.4.1 Actions and Surveillance Requirement 4.6.4.1 requires the OPERABILITY of the hydrogen analyzers to include the OPERABILITY of the associated heat tracing system. ITS 3.3.3 PAM Instrumentation requires two channels of hydrogen analyzers to be OPERABLE. This change moves CTS information regarding the hydrogen analyzer heat tracing system from the Specifications to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	1

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3.3.3 LA.2	4.6.4.1	CTS SR 4.6.4.1 states each hydrogen analyzer shall be demonstrated OPERABLE by performing a CHANNEL CALIBRATION using a sample gas containing a specified gas concentration for hydrogen mixed with nitrogen. ITS SR 3.3.3.2 requires the hydrogen analyzers have a CHANNEL CALIBRATION. This change moves the CTS sample gas requirements to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.3 LA.3	LCO 3.6.4.1	CTS LCO 3.6.4.1 states two independent containment hydrogen analyzers (shared with the other unit) shall be OPERABLE. ITS 3.3.3 PAM Instrumentation requires two channels of hydrogen analyzers to be OPERABLE. This change moves CTS information regarding the hydrogen analyzer being shared between units from the Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.3 LA.4	Table 3.3-6	CTS Table 3.3-6 Radiation Monitoring Instrumentation lists the alarm/trip setpoint and measurement range for the High Range Area Monitors. ITS 3.3.3 PAM Instrumentation requires two channels of High Range Area monitors but does not state the measuring range or alarm/trip setpoint. This change moves the measurement range and alarm/trip setpoint from the Specifications to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	1

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DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.4 LA.1	Table 3.3-9	CTS 3.3.3.5 LCO states that the auxiliary shutdown monitoring instrumentation channels in Table 3.3-9 shall be OPERABLE with readouts displayed external to the control room. CTS requirement in Table 3.3-9 lists the measuring range for each required channel and the location of the auxiliary shutdown panel where the instrumentation channel is remotely displayed. ITS LCO 3.3.4 states that the Remote Shutdown Instrumentation Functions shall be OPERABLE. This changes the CTS by moving the requirement for readouts displayed external to the control room, the location of the remote readouts (auxiliary shutdown panel) and the instrument channel ranges from the <del>specification</del> TS to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.4 LA.2	Table 3.3-9, Table 4.3-6	CTS 3.3.3.5 states that the auxiliary shutdown monitoring instrumentation in Table 3.3-9 shall be OPERABLE. CTS Table 4.3-6 lists the Surveillance Requirements for the functions in Table 3.3-9. ITS LCO 3.3.4 states that the Remote Shutdown Instrumentation Functions shall be OPERABLE. This changes the CTS by moving the list of monitoring equipment Tables 3.3-9 and 4.3-6 from the <del>specification</del> TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.5 LA.1	3.3.2.1 Action a	CTS 3.3.2.1 Action a requires that with an ESFAS instrumentation channel trip setpoint found less conservative than the value shown in the Allowable Values column of Table 3.3-4, the channel be declared inoperable and Action a be entered. ITS 3.3.5 LCO requires three channels per function to be OPERABLE and Action A requires an inoperable channel to be placed in trip within 72 hours. This changes the CTS by moving the discussion of the relationship between the Allowable Value and OPERABILITY from the Technical Specification to the Background section of the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	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 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
3.3.5 LA.2	Table 3.3-4, 3.3.2.1 LCO, Action a	CTS Table 3.3-4 functional unit 7, Loss of Power, lists the Trip Setpoints for the undervoltage and degraded voltage on the 4160-volt emergency bus. CTS 3.3.2.1 LCO and Action a state that the instrumentation channels' trip setpoints will be set, "consistent with the Trip Setpoint values." ITS 3.3.5 LCO and Actions do not contain these requirements. This changes the CTS by moving the Trip Setpoints and the trip setpoint adjustment, "consistent with the Trip Setpoint value," and details for establishing process settings from the Technical Specifications to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.5 LA.3	Table 4.3-2 NOTE (5)	CTS Table 4.3-2 requires a quarterly (Q) CHANNEL FUNCTIONAL TEST (CFT) of the Loss of Power function. The Surveillance Requirement is modified by Note (5), which states, "Each train or logic channel shall be functionally tested up to and including input coil continuity testing to the ESF relays." ITS SR 3.3.5.1 requires a TADOT to be performed every 92 days. The ITS does not contain the requirements of Note 5. This changes the CTS by moving the components tested by TADOT requirement of described in Note 5 to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	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 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
3.3.5 LA.4	4.3.2.1.2	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 additionally states, "one channel per function (will be tested) such that all channels 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 ESFAS RESPONSE TIMES to be within limits. This changes the CTS by moving details of scheduling the test from the Specification to the ITS Bases. Not used.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.5 LA.5	Table 3.3-3	CTS Table 3.3-3 for Engineered Safety Feature Actuation System (ESFAS) instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.2-1 states the channel requirement for each ESFAS function as, "REQUIRED CHANNELS." This changes the CTS by stating all of the channel requirements for each function as the required channels and moving the information of the number of channels to trip and the minimum channels needed to maintain the function OPERABLE to the UFSAR.	UFSAR	10 CFR 50.59	1

REV 17

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 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
3.3.3.1 R.1	CTS 3.3.3.1	CTS 3.3.3.1 states the radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits. Portions of the Radiation Monitoring Instrumentation specification, as shown in the CTS markup, are addressed in ITS 3.4.15, RCS Leakage Detection Instrumentation, and ITS 3.3.3, Post Accident Monitoring (PAM) Instrumentation. Those portions are not addressed in this change. The Radiation Monitoring Instrumentation monitors radiation levels in selected plant locations and indicates abnormal or unusually high radiation levels. The radiation monitors are not assumed in the accident analyses to provide signals to prevent initiation of a DBA or transient or to mitigate a DBA or transient. <del>This</del> The LCO area radiation monitors does not meet the criteria for retention in the ITS; therefore, it will be <del>retained</del> relocated to in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.2 R.1	CTS 3.3.3.2	CTS 3.3.3.2 provides requirements on the Movable Incore Detector Instrumentation when required to monitor the flux distribution within the core. The Movable Incore Detector System is used for periodic surveillance of the power distribution, and for calibration of the excore detectors. <del>This</del> LCO Movable Incore Detector Instrumentation does not meet the criteria for retention in the ITS; therefore, it will be <del>retained in</del> relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

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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 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
3.3.3.3 R.1	CTS 3.3.3.3	CTS 3.3.3.3 for Unit 1 states the Seismic Monitoring Instrumentation shown in Table 3.3-7 shall be OPERABLE. The Seismic Monitoring Instrumentation is used to record data for use in evaluating the effect of a seismic event. The Seismic Monitoring Instrumentation is not used to mitigate a DBA or transient. The Seismic Monitoring Instrumentation does not meet the criteria for retention in the ITS; therefore, it will be <del>retained in</del> relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.4 R.1	CTS 3.3.3.4	CTS 3.3.3.4 for Unit 1 states the Meteorological Monitoring Instrumentation shown in Tables 3.3-8 and 4.3-5 shall be OPERABLE. The Meteorological Monitoring Instrumentation is used to record meteorological data for use in evaluating the effect of an accidental radioactive release from the plant. The Meteorological Monitoring Instrumentation is not used to mitigate a DBA or transient. The Meteorological Monitoring Instrumentation does not meet the criteria for retention in the ITS; therefore, it will be <del>retained in</del> relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.9 R.1	CTS 3.3.3.9	Unit 1 CTS 3.3.3.9 requires the OPERABILITY of the loose parts detection instrumentation which can detect loose metallic parts in the Reactor Coolant System in order to avoid damage to the Reactor Coolant System components. The Unit 2 Technical Specifications do not contain this Specification. The <del>LCO</del> loose parts detection instrumentation does not meet the criteria for retention in the ITS; therefore, it will be <del>retained in</del> relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

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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 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
3.3.3.11 R.1	CTS 3.3.3.11	CTS 3.3.3.11 requires the Explosive Gas Monitoring Instrumentation be OPERABLE. The Explosive Gas Monitoring Instrumentation is used to ensure that the oxygen limits of the Waste Gas Holdup System are not exceeded. The oxygen concentration limit in the Waste Gas Holdup Tank ensures that the concentration of potentially explosive gas mixtures in the Waste Gas Holdup System is maintained below the flammability limits. This instrumentation is not credited in preventing or mitigating any DBA or transient as the safety analysis concerning the Waste Gas Holdup System assumes a storage tank rupture with no mitigation. This LCO Explosive Gas Monitoring Instrumentation does not meet the criteria for retention in the ITS; therefore, it will be <del>retained in</del> relocated to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	N/A

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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 L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.6	<p>CTS Table 4.3-1 lists for the Power Range Low Setpoint and Intermediate Range channels, the surveillance requirements for a CHANNEL FUNCTIONAL TEST (CFT). The Frequency of the CFT for these functions is S/U <sup>(1)</sup>. S/U requires the surveillance must be performed prior to a reactor startup. Note <sup>(1)</sup> states, "If not performed in previous 31 days." The Source and Intermediate Ranges additionally require a quarterly test to be performed (Q <sup>(12)</sup>). Note <sup>(12)</sup> 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." 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. The movement of the verification of Permissives P-6 and P-10 is addressed by DOC A.29. 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. Additionally, a COT must be performed for these instrument channels prior to reactor startup if not performed within the previous 31-92 days. The COT must be performed for the Source Range within 4 hours after reducing power below the P-6 setpoint and the Power Range Low Setpoint and Intermediate Range channels must perform the COT within 12 hours after power is reduced below the P-10 setpoint. This changes the CTS by allowing 4 hours for the Source Range and 12 hours for the Power and Intermediate Ranges to perform the required test after entry into the applicable MODES or other specified conditions.</p>	SR 3.3.1.8	Table 4.3-1	7

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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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.7	<p>CTS surveillance requirements for the Power Range Neutron Flux High Setpoint are listed in Table 4.3-1. This requires a CHANNEL CALIBRATION to be performed daily. The requirement is modified by Note (2). Unit 1 Note (2) states, "Heat balance only, above 15 % of RATED THERMAL POWER." Unit 2 Note (2) states, "Heat balance only, above 15 % of RATED THERMAL POWER. Adjust channel if absolute difference &gt; 2 percent." ITS SR 3.3.1.2 is required for the Power Range Neutron Flux High Setpoint every 24 hours. The SR states, "Compare results of calorimetric heat balance calculation to power range channel output. Adjust power range output if calorimetric heat balance exceeds power range channel output by more than +2 % RTP." This changes the CTS by only requiring an adjustment of the Power Range channel if the calorimetric exceeds the power range channel output by more than +2% RTP. Unit 2 CTS surveillance requirements for the Power Range Neutron Flux High Setpoint are listed in Table 4.3-1. This requires the D<sup>(2)</sup> CHANNEL CALIBRATION test to be performed on the instrumentation channels. Note (2) states, "Heat balance only, above 15 % of RATED THERMAL POWER. Adjust channel if absolute difference &gt; 2 percent." ITS SR 3.3.1.2 is required for the Power Range Neutron Flux High Setpoint every 24 hours. The SR is modified by Note 2 that states, "Adjust NIS channel if difference is greater than ( ) 2%." This changes the CTS only requiring an adjustment of the Power Range channel if indicated power of the NIS channel is more than 2 % lower than the calculated power of the calorimetric.</p>	SR 3.3.1.2 NOTE 2	None	76
3.3.1 L.8	<p>CTS requirements for RTS interlocks (P-6, P-8, P-10, and P-13) provide specific numbers for the Allowable Values. The Allowable Values for the P-7 function come from the requirements of P-10 and P-13. ITS requirements for these functions are provided with appropriate ≥ or ≤ symbols to specifically state the limits for each RTS interlock value. This changes the CTS by allowing the values of the RTS interlocks to be set to a limit not currently allowed.</p>	Table 3.3.1-1	Table 3.3-1	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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.9	<p>CTS Table 4.3-1 lists the surveillance requirements for the Power Range Neutron Flux CHANNEL CALIBRATION as M<sup>(3)(6)</sup>. Note<sup>(3)</sup> states, "Compare incore to excore axial offset above 15 % RATED THERMAL POWER (RTP). Adjust channel if absolute difference <math>\geq</math> 3 percent." ITS Table 3.3.1-1 specifies SR 3.3.1.3 for the Overtemperature <math>\Delta T</math> function. SR 3.3.1.3 states, " Compare results of the incore detector measurements to NIS AFD., Adjust NIS channel if absolute difference <math>&gt;3\%</math>." <del>every 31 effective full power days (EFPD). Two A Notes modify the SR which - Note 1 states, "Adjust NIS channel if absolute difference is <math>\geq 3\%</math>." Note 2 states, "Not required to be performed until 24- 72 hours after THERMAL POWER is <math>\geq 15\%</math> RTP." The change from monthly to every 31 EFPD is addressed by DOC L.16. This changes the CTS by allowing 24 specifically stating that 72-hours to perform is allowed before requiring the completion of a CHANNEL CALIBRATION after THERMAL POWER equals or exceeds-15 % RTP for the surveillance testing.</del></p>	SR 3.3.1.3 NOTE 2	None	7

REV 17

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 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.10	CTS Table 4.3-1 list for the Power Range (Low Setpoint), Intermediate Range, and the Source Range channels S/U <sup>(1)</sup> requirements for a CHANNEL FUNCTIONAL TEST (CFT). This also requires the CFT be performed prior to a reactor start up if not completed within the previous 31 days (Note <sup>(1)</sup> ). The Source and Intermediate Ranges additionally require Q <sup>(12)</sup> requirement. Note <sup>(12)</sup> states, "Quarterly Surveillance in Modes 3*, 4*, and 5* shall also include verification that Permissive 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 channels requires a COT be performed every 92 days. In addition, ITS SR 3.3.1.8 allows the COT to be performed within 12 hours after reducing power below P-10 for the Power and Intermediate ranges of instrumentation. The COT must be performed for the Source Range channels within 4 hours after reducing power below P-6. This changes the CTS by allowing Source Range channels to perform a COT within 4 hours after power is reduced below the P-6 and Intermediate and Power Ranges within 12 hours after power is reduced below P-10 setpoint.	SR 3.3.1.8	Table 4.3-1 NOTE 12	7
3.3.1 L.11	CTS testing requirements listed in Table 4.3-1 require the Source, Intermediate, and Power Range channels to perform a CHANNEL FUNCTIONAL TEST at S/U (1). Note (1) states, "If not performed within the previous 31 days." ITS SRs for these ranges of instrumentation channels are listed as SR 3.3.1.7 and 3.3.1.8. The frequency of these SRs is 92 days. A Note in the Frequency column of SR 3.3.1.8 states, "Only required when not performed within previous 92 days." This changes the CTS requirement by increasing the time from 31 to 92 days for the required testing. Not used.	N/ASR 3.3.1.7, SR 3.3.1.8	N/Atable .3-1	N/A7
3.3.1 L.12	Not used.	N/A	N/A	N/A

REV 12

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 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.15	CTS surveillance requirements for the Power Range Neutron Flux CHANNEL CALIBRATION are listed in Table 4.3-1 as D <sup>(2)</sup> . This requires the four Power Range channels to be compared to the heat balance of the RCS (calorimetric) on a daily basis. Note <sup>(2)</sup> state that the heat balance is required to be performed above 15 % RTP. ITS SR 3.3.1.2 for the Power Range Neutron Flux must be performed every 24 hours. The requirement is modified by a Note 2, which states, “Not required to be performed until 12 hours after THERMAL POWER is ≥ 15 % RTP.” This changes the CTS by allowing 12 hours to perform a CHANNEL CALIBRATION after THERMAL POWER of the Power Range channels exceeds 15 % RTP for the initial surveillance testing.	SR 3.3.1.2 Note 2	None	7
3.3.1 L.16	CTS Table 4.3-1 lists a CHANNEL CALIBRATION requirement for the Power Range channels as M <sup>(3)</sup> . This requires CHANNEL CALIBRATION to be performed every 31 days. ITS SR 3.3.1.3 requires a comparison of the incore measurements to the excore indication every 31 effective full power days (EFPD). Other changes associated with this requirement are addressed in DOC L.9 and A.28. This changes the CTS by allowing CHANNEL CALIBRATION to be performed on an EFPD basis instead of calendar days.	SR 3.3.1.3	Table 4.3-1	7

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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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.20	CTS 4.3.1.1.2 states, "The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months." ITS Table 3.3.1-1 under the Surveillance Requirements column lists SR 3.3.1.16. This SR states, "Verify RTS RESPONSE TIME is within limits." This SR is required for all RTS Functions except the following: (1) Manual Reactor Trip, (3.a) Power Range Neutron Flux High Positive Rate, (4) Intermediate Range Neutron Flux, (7) Overpower ΔT, (15) Steam/Feed Flow Mismatch and Low Steam Generator Water Level, (16) Turbine Trip, (17) SI input from ESF, (11) Reactor Coolant Pump Breaker Position Trip, (19) Reactor Trip Breakers, (20) RTB Undervoltage and Shunt Trip Mechanisms, and (21) Automatic Trip Logic. This changes the CTS by deleting the Response Time Testing requirements for the listed functions.	SR 3.3.1.16	4.3.1.1.2	5
3.3.1 L.21	CTS 2.2 Limiting Safety System Setting states in Table 2.2-1 Note 3, "the channel's maximum trip point shall not exceed its computed trip point by more than 2 percent of span." This applies to the Overtemperature and Overpower ΔT trip setpoints for the Allowable Values as stated in Notes 1 and 2. ITS 3.3.1 in Table 3.3.1-1 states for the Overtemperature and Overpower ΔT that the functions Allowable Values are listed in Notes 1 and 2. The Overtemperature ΔT Allowable Value formula is modified by a Note that states, "The Overtemperature ΔT Function Allowable Value shall not exceed the following nominal trip setpoint by more than 2.3 % of ΔT span." This changes the CTS requirement for Overtemperature ΔT by increasing the % of ΔT span from a value of 2.0 to 2.3. DELETED	Table 3.3.1-1 Note 1	Table 2.2-1 Note 3	4

REV 11

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 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.26	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 <sup>(g)</sup> . Note <sup>(g)</sup> 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 channel in trip," within 72 hours, or "Reduce THERMAL POWER < P-8," within 76 hours. A Note modifies Condition N that states, "The inoperable channel may be bypassed for up to 4-12 hours for surveillance testing of other channels." This changes the CTS by adding an allowance that an inoperable channel may be bypassed for up to 4-12 hours for surveillance testing of other channels.	3.3.1 Condition N Note	Table 3.3-1 Action 9	4
3.3.1 L.27	CTS Tables 3.3-1 and 4.3-1 list the MODES of applicability for the Intermediate Range function 5 as MODE 1 below the P-10 setpoint and MODE 2. Action 3 must be entered for an inoperable channel. Action 3-part b states "Above the P-6 setpoint, but below the P-10 setpoint, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-10 setpoint." ITS Table 3.3.1-1 Function 4 Intermediate Range lists the Applicable MODES or other specified conditions as MODES 1 <sup>(b)</sup> and 2 <sup>(c)</sup> . Note <sup>(b)</sup> states, "Below the P-10 (Power Range Neutron Flux) interlocks," and Note <sup>(c)</sup> requires, "Above the P-6 (Intermediate Range Neutron Flux) interlocks." Conditions F and G must be entered for an inoperable channel(s). Required Actions F.2 and G.2 limit THERMAL POWER for the unit to < P-6 setpoint. This changes the CTS by decreasing the applicability from MODE 2 to MODE 2 above the P-6 setpoint.	Table 3.3-1 NOTE (c)	Tables 3.3-1 and 4.3-1	2

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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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.29	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 requirement is applicable in MODES 3, 4, and 5 with the RTBs open and requires one source range channel to be OPERABLE. When the RTBs are closed and the rod control system is capable of rod withdrawal, the CTS requires two source range channels to be OPERABLE. ITS 3.3.1 requirement for the Source Range Neutron Flux, Function 5, is stated in ITS Table 3.3-1-1. 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." When the rod control system is capable of rod withdrawal, the CTS and the ITS require two source range channels to be OPERABLE. When the rod control system is not capable of rod withdrawal, the ITS requires one source range channel to be OPERABLE. This changes the CTS by requiring ITS Function 5 in MODES 3, 4, and 5 when the rod control system is incapable of rod withdrawal instead of MODES 3, 4, and 5 when the RTBs are open. This allows only one source range channel to be OPERABLE in conditions when the CTS would require two source range channels to be OPERABLE.	Table 3.3.1-1 Note (e)	Table 3.3.1.1 Function 6(c)	2
3.3.2 L.1	CTS 3.3.2.1 requires the ESFAS instrumentation channels shown in Table 3.3-3 to be OPERABLE. Table 3.3-3 states for function 6(a), Auxiliary Feedwater Pump starts on manual initiation that the total number of channels is 2. The function is required to be OPERABLE in MODES 1, 2, and 3. For an inoperable channel, Action 21 must be entered. ITS 3.3.2 in Table 3.3.2-1 does not require the manual initiation function for AFW pump starts. This changes the CTS by deleting the requirements for manual initiation of AFW pump starts.	None	Table 3.3-3 function 6(a)	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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.4	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. This changes the CTS by deleting the “during shutdown” requirement and requires the test be performed every 18 months.	SR 3.3.2.7	Table 4.3-2 NOTE (1)	7
3.3.2 L.5	CTS 3.3.2.1 requirements listed in Table 3.3-3 for P-11 and P-12 specifies two limits for the Allowable Values for each function. The P-11 function lists allowable values for: ≤ 2010 psig prevents manual block of Safety Injection (SI) on Low Low Pressurizer Pressure; and ≤ 1990 psig allows the manual block of SI on Low Low Pressurizer Pressure. The P-12 function lists allowable values for: ≤ 545 °F prevents manual block of SI actuation of high steam line flow; and ≥ 541 °F allows the manual block of SI on high steam line flow. ITS 3.3.1 requirements in Table 3.3.42-1 for the Reactor Trip System interlocks P-11 and P-12 list the allowable values that prevents manual block of the functions. P-11 allowable value ≤ 2010 psig and P-12 allowable value ≤ 545 °F. This changes the CTS by not requiring these interlocks to state Allowable Values for allowing manual functions blocks.	Table 3.3.2-1	Table 3.3.4-34	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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.7	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 <sup>###</sup> . Notation <sup>###</sup> 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 <sup>(e)</sup> , and 3 <sup>(e)</sup> . Note <sup>(e)</sup> 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 the CTS by stating the Functions 5.a and 5.b are not applicable in MODE 2 when appropriate valves are closed and provide the required safety function.	Table 3.3.2-1 Function 5	Table 3.3-3	2
3.3.3 L.1	CTS 3.3.3.6 Action a requires the restoration of PAM instrumentation channels within seven days whenever one required channel is inoperable or the unit to be shutdown within the next 12 hours. CTS 3.6.4.1 Action a requires the restoration of an inoperable hydrogen analyzer within thirty days with one analyzer inoperable. ITS 3.3.3 Conditions A and B require the restoration of post accident instrumentation channels within thirty days or the initiation of a special report. This changes the CTS by deleting the requirements for the unit to be in HOT SHUTDOWN within the next 12 hours with one inoperable channel for a Function that has two required channels, allowing an additional restoration time, and instead requiring a report to be made in accordance with Specification 5.6.6.	None	3.3.3.6 Action a 3.6.4.1 Action a	3,4

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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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.3 L.2	CTS 3.3.3.6 Action b requires the restoration of inoperable PAM instrumentation channels within forty-eight hours whenever both required channels for a Function are inoperable. CTS 3.6.4.1 Action b. allows 7 days to restore one hydrogen analyzer to OPERABLE status when both are inoperable. ITS 3.3.3 Condition C requires the restoration of inoperable PAM instrumentation channels within seven days. This changes the CTS by allowing an additional five days for restoration of an inoperable instrumentation channel for a Function that has two inoperable channels.	3.3.3 Condition C	3.6.4.1 Action b	3
3.3.3 L.3	CTS SR 4.6.4.1 states, in part, "Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION." Under the CTS definition of STAGGERED TEST BASIS, both hydrogen analyzer channels must be tested every 92 days in equal subintervals. ITS SR 3.3.3.2 states a CHANNEL CALIBRATION must be performed at a frequency of every 92 days. This changes the CTS for the hydrogen analyzer by eliminating the STAGGERED TEST BASIS (STB) requirement that the hydrogen analyzers be tested in equal subintervals of the Frequency.	SR 3.3.3.2	SR 4.6.4.1	7
3.3.3 L.4	Not used.	N/A	N/A	N/A
3.3.3 L.5	CTS 3.3.3.6 in Table 3.3-10 requires the following functions to be OPERABLE: 8) Refueling Water Storage Tank, 9) Boric Acid Tank Solution Level, 10) Auxiliary Feedwater Flow Rate, 12) PORV Position Indicator, 13) PORV Block Valve Position Indication, 14) Safety Valve Position Indication, and 16) Containment Water Level. ITS 3.3.3 does not require these functions to be OPERABLE. This changes the CTS by deleting these functions from the post accident monitoring functions.	None	Table 3.3-10 functions 8, 9, 10, 12, 13, 14 and 16	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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.3 L.6	CTS Table 3.3-6 requires 2 channels of the Containment High Range Area Monitors to be OPERABLE in MODES 1, 2, 3, and 4. ITS LCO 3.3.3 Function 11, Containment Area Radiation (High Range), requires 2 channels to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by deleting the function in MODE 4.	Table 3.3.3-1	Table 3.3-6	62
3.3.3 L.7	CTS Table 3.3-6 requires 2 channels of the Containment High Range Area Monitors to be OPERABLE. Table 3.3-6 specifies Action 35 is to be entered when a channel becomes inoperable. This action requires inoperable channels to be returned to OPERABLE within 7 days. ITS LCO 3.3.3 Function 11, Containment Area Radiation (High Range), requires 2 channels to be OPERABLE. ITS Condition A is required to be entered for an inoperable channel for a period of 30 days. This changes the CTS by allowing 23 additional days for one channel of Containment High Range Area Monitors to be inoperable.	3.3.3 ACTION A	Table 3.3-6 Action 35	73
3.3.3 L.8	CTS Table 3.3-6 requires 2 channels of the Containment High Range Area Monitors to be OPERABLE. Table 3.3-6 specifies Action 35 is to be entered when a channel becomes inoperable. This action requires inoperable channels to be returned to OPERABLE within 7 days or a special report be made within 14 days. ITS LCO 3.3.3 Function 11, Containment Area Radiation (High Range), requires 2 channels to be OPERABLE in MODES 1, 2, and 3. ITS Condition A allows one channel to be inoperable for a period of 30 days before a report is required. ITS Condition B required with 2 channels inoperable that one channel must be restored to OPERABLE status within 7 days or the plant must be shutdown. This changes the CTS by allowing 2 channels of Containment High Range Area Monitors to be inoperable and providing a period of 7 days to restore one inoperable channel.	3.3.3 ACTION A	Table 3.3-6 Action 35	3,4

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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

Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.1	Unit 1 CTS Table 4.3-1 Function 16 RCP Undervoltage does not contain a Surveillance Requirement for a CHANNEL FUNCTIONAL TEST to be performed. Unit 2 CTS Table 4.3-1 Function 16 requires a CHANNEL FUNCTIONAL TEST to be performed at a Q (Quarterly) Frequency. ITS Table 3.3.1-1 Function 12 RCP undervoltage requires ITS SR 3.3.1.6 to be performed for both units undervoltage functions. A Note that states, "Verification of setpoint is not required," modifies the SR. This changes the Unit 1 CTS Surveillance Requirements for RCP undervoltage by specifying a TADOT be performed every 92 days and adds a Note to the SR.	SR 3.3.1.6 Note	Unit 2 CTS Table 4.3-1 None
3.3.1 M.2	CTS 3.3.1.1 Action 2 requires an inoperable Power Range channel to be placed in trip within 72 hours, for either the neutron flux levels or positive and negative rate trips functions being inoperable. If this cannot be accomplished, the unit is required to enter LCO 3.0.3 and one hour is allowed to initiate action and 6 additional hours for the unit to be placed in HOT STANDBY. CTS LCO 3.0.3 provides the requirements when a LCO is not met and within one hour Action shall be initiated to place the unit in a MODE in which the Specification does not apply. ITS LCO 3.0.3 is required to be entered if more than one Power Range channel becomes inoperable for either of the required functions of flux level or rate trips. ITS 3.3.1 Required Actions D for an inoperable Power Range Neutron Flux channel requires the inoperable channel to be placed into trip within 72 hours with additional compensatory measures, or place the unit in MODE 3 within the next 6 hours. ITS 3.3.1 Required Action E for an inoperable Power Range channel for positive or negative rate trips, requires the inoperable channel to be placed into trip within 72 hour or the unit is required to be in MODE 3 within the next 6 hours. This changes the CTS requirements by decreasing the time allowed to be in MODE 3 from 7 hours in the CTS to 6 hours for the ITS.	3.3.1 ACTIONS D and E	3.3.1.1 Action 2
3.3.1 M.3	CTS 3.3.1.1 Action 3.b requires for an inoperable Intermediate Range channel, when power is below P-10 and above the Intermediate Range interlock P-6, that the channel be restored to OPERABLE status prior to increasing power above the P-10 limit. ITS Required Actions F.1 and F.2 only allow operation between P-6 and P-10 power levels for a maximum time of 24 hours. After that, power level is required to either be increased above P-10 or decreased below P-6. The allowance for increasing power above P-10 is addressed by DOC L.4.. Limiting the time with an inoperable Intermediate Range channel to 24 hours changes the CTS requirements, which currently allows operation for an indefinite period of time.	ITS Required Actions F.1 and F.2	3.3.1.1 Action 3.b

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.7	CTS Table 4.3-1 lists the surveillance requirements of CHANNEL CALIBRATION for the Turbine Trip Function 18.A Auto Stop Oil Pressure and Function 18.B Turbine Stop Valves Closure as Not Applicable (N/A). ITS Table 3.3.1-1 Function 16 Turbine lists the CHANNEL CALIBRATION surveillance requirement for the Auto Stop Oil Pressure and Turbine Stop Valve Closure as SR 3.3.1.10. This must be performed at a Frequency of 18 months. This SR is modified by a Note that requires the verification that time constants are adjusted to prescribed values. This changes the CTS by adding a CHANNEL CALIBRATION requirement for the Turbine Trip functions.	Table 3.3.1-1, SR 3.3.1.10	Table 4.3-1
3.3.1 M.8	CTS Table 4.3-1 contains a Surveillance Requirement for the Intermediate Range channels. A CHANNEL CALIBRATION is required and modified by a footnote. Note 13 states, "The provisions of Specification 4.0.4 are not applicable for entry in MODE 2 or 1." ITS SR 3.3.1.11 for the Intermediate Ranges requires a CHANNEL CALIBRATION every 18 months. This changes the CTS by deleting a portion of the Note allowing reinstating the Specification 4.0.4 allowance.	SR 3.3.1.11	Table 4.3-1 Note 13
3.3.1 M.9	Unit 1 CTS Table 4.3-1 Function 20, RCP Breaker Position Trip, lists N/A under the column labeled "MODES IN WHICH SURVEILLANCE REQUIRED." Function 20 requires a CHANNEL FUNCTIONAL TEST to be performed on an R (Refueling) frequency. Unit 2 CTS Table 4.3-1 Function 18, Turbine Trip on Low Auto Stop Oil Pressure and Turbine Stop Valve Closure, lists N/A under the "MODES IN WHICH SURVEILLANCE REQUIRED," column. Function 18 requires a CHANNEL FUNCTIONAL TEST to be performed for each portion of the function at a frequency of S/U <sup>(1)</sup> . S/U requires the surveillance to be performed prior to each reactor start up. Note <sup>(1)</sup> states, "If not performed within the previous 31 days." The applicable MODES or other specified conditions for ITS Table 3.3.1-1 Function 11, RCP Breaker Position Trip is MODE 1 <sup>(f)</sup> , with SR 3.3.1.14 as a required Surveillance. Note <sup>(f)</sup> states, "Above the P-7 (Low Power Reactor Trips Block) interlock." The applicable MODES or other specified conditions for ITS Table 3.3.1-1 Function 16, Turbine Trip on Low Auto Stop Oil Pressure or Turbine Stop Valve Closure, is MODE 1 <sup>(g)</sup> with SR 3.3.1.15 as one of the required Surveillances. Note <sup>(g)</sup> states, "Above the P-8 (Power Range Neutron Flux) interlock." This changes the CTS by requiring the surveillance for the RCP Breaker Position Trip and the Turbine Trip Functions to be performed in the ITS when they are not required in the CTS.	Table 3.3.1-1 NOTE (f) and (g)	Table 4.3-1
3.3.1 M.10	CTS Table 4.3-1 Function 23.b Low Power Reactor Trip Block, P-7, states that a CHANNEL CALIBRATION and a CHANNEL FUNCTIONAL TEST are to be performed at a frequency of R (refueling). ITS Table 3.3.1-1 Function 18.b Low Reactor Power Trips Block, P-7, states that SR 3.3.1.5 ACTUATION LOGIC TEST (ALT) is to be performed at a Frequency of every 31 days on a STAGGERED TEST BASIS (STB). This changes the CTS by requiring an ALT to be performed every 31 days on a STB instead of a CHANNEL CALIBRATION and a CHANNEL FUNCTIONAL TEST being conducted every refueling.	Table 3.3.1-1, SR 3.3.1.5	Table 4.3-1

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.11	<p>CTS Table 3.3-1 Function 21A, RTBs, lists Actions 1 and 14 to be followed for an inoperable channel in MODES 1 and 2. Action 14 states, “With one of the diverse trip features (undervoltage or shunt trip device) inoperable, restore it to OPERABLE status within 48 hours or declare the RTB inoperable and apply Action 1.” Additionally, the Action states, “The breaker shall not be bypassed while one of the diverse trip features is inoperable except for the time required for performing maintenance to restore the breaker to OPERABLE status.” ITS 3.3.1 Function 20, RTB Undervoltage and Shunt Trip Mechanism, requires these mechanisms to be OPERABLE for each RTB in MODES 1 and 2, and MODES 3(a), 4(a), and 5(a). Note (a) states, “With the Rod Control System capable of rod withdrawal or one or more rods not fully inserted.” If either function becomes inoperable Conditions S (MODES 1 and 2) or Condition C (MODES 3(a), 4(a), and 5(a)) must be entered. Required Actions for Condition C direct that the inoperable trip mechanism be restored to OPERABLE status within 48 hours or insert all rods and place the Rod Control System in a condition where rods cannot be withdrawn. This is required within one hour. This changes the CTS by requiring the diverse trip functions to be OPERABLE in MODES 3(a), 4(a), and 5(a), and adding of ITS Condition C requirements.</p>	Table 3.3.3-1 NOTE (a)	Table 3.3-1 Actions 1 and 14
3.3.1 M.12	<p>CTS Table 3.3-1 Function 21A Reactor Trip Breakers lists Action 1 to be entered for an inoperable channel in MODES 1 and 2. CTS Action 14 is applicable for the RTBs for the diverse trip function and it states, “With one of the diverse trip features (undervoltage or shunt trip device) inoperable, restore it to OPERABLE status within 48 hours or declare the breaker inoperable and apply Action 1. The breaker shall not be bypassed while one of the diverse trip features is inoperable except for the time required for performing maintenance to restore the breaker to OPERABLE status.” ITS Table 3.3.1-1 Function 19 RTB requires 2 trains to be OPERABLE in MODES 1 and 2 and Condition P to be entered if one RTB train is inoperable. Condition P states that with one train inoperable, it must be restored to OPERABLE status in one hour or be in MODE 3 within 7 hours. Three Notes modify the Condition. Note 2 states, “One RTB may be bypassed for up to 2 hours for maintenance on undervoltage or shunt trip mechanisms, provided the other train is OPERABLE.” This changes the CTS requirements for the RTBs by limiting to 2 hours any maintenance on the undervoltage or shunt trip mechanism before declaring the RTB train inoperable.</p>	3.3.1 ACTION P NOTE 2	Table 3.3-1 Action 14

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.13	CTS Table 4.3-1 Surveillance Requirements do not require a quarterly test on the OTAT Functions to ensure an accurate input for the f ( $\Delta I$ ) from the required Power Range channels. ITS Table 3.3.1-1 Function 6 states SR 3.3.1.6-9 must be performed. ITS SR 3.3.1.6-9 states, "Compare results of the excore channels to the incore detector measurements." This SR must be performed every 92 effective full power days (EFPD). Two Notes modify the requirement. Note 1 states, " Adjust NIS channel if absolute difference is $\geq 3\%$ ." Note 2 states, "Not required to be performed until 24-72hours after THERMAL POWER is $\geq 50\%$ ." This changes the CTS by requiring an additional Surveillance Requirement for the OTAT Function.	Table 3.3.1-1, SR 3.3.1.6-9 NOTE 1	None
3.3.2 M.1	CTS Surveillance requirement 4.3.2.1.2-1 requires the testing of the ESFAS interlocks to determine OPERABILITY. The two interlocks P-11 and P-12 are required to be OPERABLE. No specific requirement is stated or implied to perform a CHANNEL CHECK for the interlocks. ITS SR 3.3.2.1 is added to the surveillance requirements for the P-11 and P-12 interlocks. This change modifies the CTS requirements for these interlocks and requires a CHANNEL CHECK to be performed every twelve hours.	SR 3.3.2.1	4.3.2.1.2
3.3.2 M.2	CTS Surveillance listed in Table 4.3-2 provide CHANNEL CALIBRATION requirements for a variety of functions to be performed at a R (refueling) frequency. ITS Surveillance Requirement 3.3.2.8 specifies a CHANNEL CALIBRATION be performed every 18 months. A Note modifies the SR that states "This Surveillance shall include verification that the time constants are adjusted to the prescribed values." This changes the CTS by adding the requirement to perform a verification of time constants adjusted to prescribed values with a CHANNEL CALIBRATION of the various safety functions.	SR 3.3.2.8 NOTE	Table 4.3-2

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.6	<p>CTS Surveillance Requirements listed in Table 4.3-2 for the Station Blackout start for the Auxiliary Feedwater (AFW) pump (function 6.e) requires a CHANNEL CALIBRATION and ESFAS RESPONSE TIMES test to be conducted on a refueling basis. The CTS does not require a CHANNEL FUNCTIONAL TEST to be performed at any frequency. The ITS 3.3.2 Function for the start of the AFW pump on Loss of Offsite Power (6.d) requires the performance of SRs 3.3.2.8 (CHANNEL CALIBRATION) and 3.3.2.9 (ESFAS RESPONSE TIMES) every 18 months, and 3.3.2.6 (TADOT) every 92 days. The TADOT is modified by a Note that states, “Verification of relay setpoints not required.” This changes the CTS by requiring the TADOT to be performed every 92 days.</p>	SR 3.3.2.6	None
3.3.2 M.7	<p>CTS requirements in Table 3.3-3-4 list the Allowable Values for ESFAS Functions and Interlocks. The Allowable Values for the following function are stated as: Safety Injection (SI) on Containment Pressure High <math>\leq 18.5</math> psia, SI on Pressurizer Pressure Low-Low <math>\geq 1755</math> psig, SI on Steam Flow in Two Steam Lines Coincident with <math>T_{ave}</math> Low-Low or Steam Line Pressure Low <math>\leq a \Delta P</math> corresponding to 44% of full steam flow increasing to 111.5% at full load, Containment Spray on Containment Pressure High-High <math>\leq 29.25</math> psia, Steam Line Isolation on Containment Pressure Intermediate High-High <math>\leq 19.3</math> psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with <math>T_{ave}</math> Low-Low or Steam Line Pressure Low <math>\leq a \Delta P</math> corresponding to 44% of full steam flow increasing to 111.5% at full load. ITS requirements in Table 3.3.2-1 lists the Allowable Values for the ESFAS Functions and Interlock as the following: SI on Containment Pressure High <math>\leq 17.7</math> psia, SI on Pressurizer Pressure Low-Low <math>\geq 1770</math> psig, SI on Steam Flow in Two Steam Lines Coincident with <math>T_{ave}</math> Low-Low or Steam Line Pressure Low <math>\leq a \Delta P</math> corresponding to 44% of full steam flow increasing to 111% at full load, Containment Spray on Containment Pressure High-High <math>\leq 28.45</math> psia, Steam Line Isolation on Containment Pressure Intermediate High-High <math>\leq 18.5</math> psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with <math>T_{ave}</math> Low-Low or Steam Line Pressure Low <math>\leq a \Delta P</math> corresponding to 42 % of full steam flow increasing to 111% at full load. This changes the CTS Allowable Values for these functions to more restrictive values in the ITS Allowable Values.</p>	Table 3.3.2-1	Table 3.3-3

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.8	CTS Table 4.3 – 2 for Functional Unit 8.c, Engineered Safety Feature Actuation System Interlock Reactor Trip (P – 4), requires the performance of a CHANNEL FUNCTIONAL TEST every refueling (R). ITS Function 8.a, ESFAS Interlock, Reactor Trip (P – 4), requires the performance of SR 3.3.2.10. This SR requires the performance of a TADOT at a frequency of once per reactor trip breaker (RTB) cycle. The SR is modified by a Note that states, “Verification of setpoint not required.” The ITS TADOT and CTS CHANNEL FUNCTIONAL TEST requirements are equivalent. This changes the CTS by <del>requiring the performance of the TADOT each time the reactor trip breaker is cycled instead of one per refueling cycle</del> increasing the testing Frequency from once per refueling cycle to each time the reactor trip breaker is cycled.	SR 3.3.2.10	Table 4.3 – 2
3.3.3 M.1	CTS 3.3.3.6 Action b states that with the number of OPERABLE accident monitoring instrumentation channels less than the minimum channels OPERABLE requirements of Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours. ITS 3.3.3 Action C states, “One or more Functions with two required channels inoperable, restore one channel to OPERABLE status within 7 days.” If this is not accomplished, ITS Action D states, “Required Action and associated Completion Time of Condition C not met, be in MODE 3 in 6 hours and MODE 4 within 12 hours.” This changes the CTS requirement by requiring the unit to be in MODE 3 within 6 hours.	3.3.3 ACTION C, 3.3.3 ACTION D	3.3.3.6 Action b
3.3.3 M.2	CTS LCO 3.6.4.1, hydrogen analyzers, is applicable in MODES 1 and 2. CTS 3.6.4.1 Action b states if both hydrogen analyzers are inoperable for more than <del>forty-eight hours</del> 7 days, the unit must be placed in HOT STANDBY within the next six hours. ITS 3.3.3 is applicable in MODES 1, 2, and 3. ITS Action D states if two hydrogen analyzers are inoperable for greater than seven days, the unit to be placed in MODE 3 within six hours and MODE 4 within twelve hours. This changes the CTS requirements for the hydrogen analyzers from MODES 1 and 2 to MODES 1, 2, and 3 and the Required Actions from being in MODE 3 to being in MODE 4.	3.3.3 ACTION D	3.6.4.1 Action b
3.3.3 M.3	CTS 3.3.3.6, Table 3.3-10, Functions 4 and 5, require one channel for the reactor coolant pressure-wide range and pressurizer water level functions. ITS 3.3.3, Table 3.3.3-1, Functions 5 and <del>4-13</del> require two channels for RCS Pressure (Wide Range) and Pressurizer Level. This changes the CTS requirements for the parameters from one to two required channels.	Table 3.3.3-1, Functions 5 and 12	Table 3.3-10, Functions 4 and 5

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M.4	CTS 3.3.3.6 Table 3.3-10 does not require OPERABLE indication channels for the parameters of nuclear instrumentation, containment pressure (narrow range), containment isolation valve position, containment area radiation levels, wide range steam generator level, the inventory of water to supply AFW pumps, and high pressure Safety Injection flow. These are added to the CTS and shown in ITS 3.3.3, Table 3.3.3-1, Functions 1, 2, 8, 10, 14, 16, and 18. The Gammametric Power and Source range channels (Functions 1 and 2) provide nuclear instrumentation indication, with two channels of each range. Two channels provide narrow range containment pressure (Function 8). Containment isolation valve position indication (Function 10) is required for each of two valves per penetration flow path. This requirement is modified by a note that requires only one position indication channel per penetration flow path with one installed channel located in the Control Room. Steam generator level is additionally monitored by wide range indication (Function 14). The last two requirements are added for two channels of Emergency Condensate Storage Tank level (Function 16) and two indications for the High Head Safety Injection flow (Function 18). In addition, SRs are added for each function. Two Notes modify the requirements for Function 9, Containment Isolation Valve Position. Note (a) states, "Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured." Note (b) states, "Only on position indication channel is required for penetration flow paths with only one installed control room indication channel." This changes the CTS by adding new functions, Notes, and SRs.	Table 3.3.3-1, Functions 1, 2, 8, 10, 14, 16, and 18, Notes (a) and (b)	None
3.3.3 M.5	CTS 3.3.3.6, Table 3.3-10, Function 18 states the total number of channels required for the In Core Thermocouples (T/Cs) as four per core quadrant. ITS 3.3.3, Table 3.3.3-1, Function 6.c for Core Exit Temperature, states the required number of channels as two per quadrant. ITS Note c requires a channel to consist of two T/Cs. This changes the CTS to require two T/Cs be powered from one train and the other two T/Cs be powered from the other train. This changes the CTS by requiring two trains of T/Cs.	Table 3.3.3-1, Function 6.c	Table 3.3-10, Function 18
3.3.3 M.6	CTS 3.3.3.6, Action c states, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.3.3 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.3.3.6, Action c
3.3.4 M.1	CTS 3.3.3.5 Action a requires that if an inoperable channel can not be returned to OPERABLE status, the unit must be placed in HOT SHUTDOWN within the next 12 hours. ITS 3.3.4 Action B requires if a required channel can not be returned to OPERABLE status, the unit must be in MODE 3 within the next 6 hours and MODE 4 within the next 12 hours. This changes the CTS requirements by specifying that MODE 3 must be achieved within 6 hours.	3.3.4 ACTION B	3.3.3.5 Action a

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 M.2	CTS LCO 3.3.3.5 states, "The auxiliary shutdown panel monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE . . ." ITS LCO 3.3.4 states, "The Remote Shutdown System Functions shall be OPERABLE." The following functions for various control systems are added to the ITS requirements: Boric Acid Pump controls, Pressurizer Heaters controls, AFW Pump and Valve controls, SG PORV controls, and Charging Pump controls. These control systems are included in the Bases Table B3.3.4-1. ITS SR 3.3.4.2 is also added and requires verification that each required control circuit or transfer switch is capable of performing its required function once every 18 months. This changes the CTS by adding the control functions and a surveillance to verify their OPERABILITY every 18 months.	LCO 3.3.4, Table B3.3.4-1, SR 3.3.4.2	Table 3.3-9
3.3.4 M.3	CTS 3.3.3.5, Action b, states, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.3.4 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.3.3.5 Action b
3.3.5 M.1	CTS Table 3.3-4, Engineered Safety Feature Actuation System Instrumentation Trip Setpoints, lists the Allowable Values for the Loss of Power on the 4160-Volt Emergency Bus Undervoltage for loss of voltage and degraded voltage. The degraded voltage Allowable Value is stated as, "≥ 3688 volts with a time delay of ≤ 63 seconds." This requirements is translated into the ITS SR 3.3.5.2 and states the degraded voltage requirement as, "≥ 3720V and ≤3772V with: 1. a time delay of 7.5 ± 1.5 seconds with a Safety Injection (SI) signal for LCO 3.3.5.a Function; and 2. A time delay of 56 ± 7 seconds without an SI signal for LCO 3.3.5.a and LCO 3.3.5.b Functions." This changes the CTS by changing the Allowable Value from 3688 V to a range of 3720 V to 3772 V and adding the requirement that the time delay with an SI signal be 7.5 ± 1.5 seconds and without an SI signal be 56 ± 7 seconds. <del>for the CHANNEL CALIBRATION for the degraded voltage Allowable Values and states the degraded voltage requirement as, "≥ 3720 volts with a time delay of ≤ 63 seconds without an SI signal." ITS SR 3.3.5.3 2 adds the Allowable Value requirement for degraded voltage time delay requirement with a safety injection signal and states the requirement as, "≥ 3720 volts with a time delay of ≤ 9 seconds with an SI signal." This changes the CTS by changing the Allowable Value from 3688 V to 3720 V and adding the requirement that the time delay with an SI signal be verified to be less than 9 seconds.</del>	SR 3.3.5.2, <del>SR 3.3.5.3</del>	Table 3.3-4

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Table M – More Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M.2	<p>CTS Table 3.3-4 ESFAS Trip Setpoints lists the Allowable Values for the Loss of Power on the 4160-Volt Emergency Bus Undervoltage for loss of voltage. The loss of voltage Allowable Value is stated as, “≥ 2989 volts with a time delay of ≤ 3.0 seconds.” This requirement is translated into ITS SR 3.3.5.2 and states the loss of voltage requirement as, “≥ 2935 V and ≤ 3225 V with a time delay of 2 ± 1 seconds for LCO 3.3.5.a and LCO 3.3.5.b Functions.” This changes the CTS by changing the Allowable Value from 2989 V to a range of 2935 V to 3225 V and adding the requirement that the time delay be 2 ± 1 seconds instead of ≤ 3.0 seconds.</p> <p><del>a Loss of Voltage and Degraded Voltage condition of the 4160 Volt emergency buses. The Allowable Values are listed for the minimum voltage values of each function. ITS SR 3.3.5.2 specifies a maximum and a minimum Allowable Value for the Loss of Voltage and Degraded Voltage functions. The maximum voltage Allowable Value for the Loss of Voltage is ≤ 3225 Volts, and the Degraded Voltage Allowable Value is ≤ 3772 Volts. This changes the CTS by adding Allowable Values that are not currently specified.</del></p>	SR 3.3.5.2	Table 3.3-4
3.3.5 M.3	<p>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. ITS LCO 3.3.5, “Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation,” requires three channels per bus for the undervoltage and degraded voltage Functions for this unit H and J Train 4160 VAC buses to be OPERABLE. The LCO additionally requires the H and/or J Train 4160 VAC buses on the other unit that are needed to support shared components to be OPERABLE. This changes the LCO requirements by specifically requiring LOP EDG start instrumentation from the other unit to be OPERABLE when supporting shared components for this unit.</p>	LCO 3.3.5	Table 3.3-4
3.3.5 M.4	<p>CTS Surveillance Requirements 4.3.2.1.1 and 4.3.2.1.2 require the periodic testing of Loss of Voltage and Degraded Voltage Functions for the Loss of Power on the 4160 kV emergency bus. ITS SRs 3.3.5.1, 3.3.5.2, and 3.3.5.3 require the testing of the LOP EDG start instruments for this unit and the other unit that supplies shared electrical power to shared components. These requirements are specified as LCO 3.3.5.a and LCO 3.3.5.b Functions. This changes the CTS by requiring the other unit loss of voltage and degraded voltage Functions to be tested for this unit if they support shared components.</p>	LCO 3.3.5.a, LCO 3.3.5.b SR 3.3.5.1, SR 3.3.5.2, SR 3.3.5.3	4.3.2.1.1, 4.3.2.1.2

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Table M – More Restrictive Changes  
 ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M.5	CTS Table 3.3-3, Functional Unit 7, "LOSS OF POWER," and Table 4.3-2, Functional Unit 7, "LOSS OF POWER," state that the applicable MODES are 1, 2, 3, and 4. ITS 3.3.5 requires Loss of Power EDG Start Instrumentation to be OPERABLE in MODES 1, 2, 3, and 4 and when the associated EDG is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown." This changes the CTS by expanding the conditions under which the Loss of Power instrumentation must be OPERABLE.	3.3.5 Mode of Applicability	None

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Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.1 A.2	<p>CTS 3.2.5, Table 3.2-1, contains placeholders for DNB limits during 2 loop operation with loop stop valves open and during 2 loop operation with isolated loop stop valves closed. A footnote, designated **, states that values will be dependent on NRC approval of ECCS evaluation for these conditions. The ITS does not contain a similar place holder. This changes the CTS by eliminating references and place holders for DNB limits applying to two-loop operation.</p> <p>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 (MODE 1). This change is designated as administrative because it eliminates an option in the CTS which cannot be used.</p>	None	Table 3.2-1
3.4.2 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.2 A.2	<p>CTS 3.1.1.5 Action states, "With a Reactor Coolant System operating loop temperature, Tavg, less than 541 °F, restore Tavg to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes." ITS 3.4.2, Action A, states that with Tavg in one or more RCS loops not within limit, be in MODE 2 with Keff &lt; 1.0 within 30 minutes. This changes the CTS by eliminating the requirement to restore Tavg to within its limit within 15 minutes. The change associated with entering MODE 2 with Keff &lt; 1.0 instead of HOT STANDBY is discussed in DOC A.3.</p> <p>This change is acceptable because it results in no technical change to the Technical Specifications. Restoration of compliance with LCO is always an option in an Action, so eliminating the restoration Action from the CTS has no effect. In both the CTS and the ITS, if Tavg is not restored with 30 minutes, the unit must be placed in a MODE in which the LCO does not apply. This change is designated as administrative as it results in no technical change to the Technical Specifications.</p>	3.4.2 Action A	3.1.1.5

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.2 A.3	<p>CTS 3.1.1.5 Action states, "With a Reactor Coolant System operating loop temperature, Tavg, less than 541 °F, restore Tavg to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes." ITS 3.4.2, Action A, states that with Tavg in one or more RCS loops not within limit, be in MODE 2 with Keff &lt; 1.0 within 30 minutes. This changes the CTS requirement to enter HOT STANDBY to enter MODE 2 with Keff &lt; 1.0. Other changes to this Action are discussed in DOC A.2.</p> <p>This change is acceptable because it results in no technical change to the Technical Specifications. CTS 3.1.1.5 is applicable in MODE 1 and MODE 2 with Keff ≥ 1.0. CTS 3.0.1 states that Actions are applicable during the MODES or other conditions specified for the Specification. Therefore, the CTS 3.1.1.5 Action to enter MODE 3 ceases to be applicable once the unit enters MODE 2 with Keff &lt; 1.0, and the Action is exited. As a result, changing the ACTION to "be in MODE 2 with Keff &lt; 1.0" results in no operational difference from the CTS Action. This change is designated as administrative as it results in no technical change to the Technical Specifications.</p>	3.4.2 Action A	3.1.1.5
3.4.2 A.4	<p>Unit 2 CTS 3.1.1.5 Applicability is modified by a footnote, designated with an asterisk, which states, "See Special Test Exception 3.10.3." ITS 3.4.2 does not contain this reference.</p> <p>This change is acceptable because this footnote is provided for information only, and does not contain any requirements. It is an ITS convention to not include such references and it has been removed. This change is designated as administrative as it is an editorial change required to comply with the ITS format and content rules.</p>	None	Unit 2, 3.1.1.5
3.4.3 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 A.2	<p>CTS 3.4.9.1 states that the RCS temperature and pressure shall be limited “during heatup, cooldown, and inservice leak and hydrostatic testing.” CTS 3.4.9.1 is applicable at all times. ITS 3.4.3 states that the RCS pressure, temperature, and RCS heatup and cooldown rates shall be maintained. ITS 3.4.3 is applicable at all times. This changes the CTS by eliminating the LCO requirement that the limits must be met during heatup, cooldown, and inservice leak and hydrostatic testing.</p> <p>This change is acceptable because the CTS and ITS limits are applicable at all times, including during heatup, cooldown, and inservice leak and hydrostatic testing. Stating that the limits are applicable during heatup, cooldown, and inservice leak and hydrostatic testing in the LCO presents an apparent conflict with the Applicability which states that the limits apply at all times. This change is designated as administrative as it is an editorial change to eliminate an apparent conflict in the CTS.</p>	3.4.3	3.4.9.1
3.4.3 A.3	<p>CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS; determine that the RCS remains acceptable for continued operations. ITS 3.4.3, Conditions A and C state that when the requirements of the LCO are not met, the parameters must be restored to within limits and it must be determined that the RCS acceptable for continued operation. ITS 3.4.3, Conditions A and C are modified by a Note which requires the determination that the RCS is acceptable for continued operation to be performed whenever the Condition is entered. This changes the CTS by explicitly stating that a determination that the RCS is acceptable for continued operation must be performed whenever the condition is entered. Other changes to the Actions are described in other DOCs.</p> <p>This change is acceptable because it is the current understanding and application of the CTS Action. The CTS 3.4.9.1 Action is currently interpreted as requiring a determination that the RCS is acceptable for continued operation whenever the LCO is not met. This change is designated as editorial as it clarifies the current understanding of the CTS requirement.</p>	3.4.3 Conditions A and C	3.4.9.1

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 A.4	<p>CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS; determine that the RCS remains acceptable for continued operations. ITS 3.4.3, Conditions A and C divide the Conditions. ITS 3.4.3 Condition A is applicable when the requirements of the LCO are not met in MODES 1, 2, 3, and 4. Condition C is applicable when the requirements of the LCO are not met any time in other than MODE 1, 2, 3, or 4. Any technical changes resulting from this division are discussed in other DOCs.</p> <p>This change is acceptable because the surveillance is unnecessary and repetitive. The unit is required to remove material irradiation surveillance specimens and generate P/T curves in accordance with 10 CFR 50, Appendix H. Therefore, the surveillance serves no purpose and is removed. This change is designed as administrative as it eliminates a requirement that is duplicative of a requirement in the CFR.</p>	3.4.3 Conditions A and C	3.4.9.1
3.4.3 A.5	<p>CTS 4.4.9.1.2 states that the reactor vessel material irradiation surveillance specimens shall be removed and examined to determine changes in material properties at the intervals required by 10 CFR 50, Appendix H. The results of these examinations shall be used to update the P/T limit curves. ITS 3.4.3 does not contain this Surveillance.</p> <p>This change is acceptable because the surveillance is unnecessary and repetitive. The unit is required to remove material irradiation surveillance specimens and generate P/T curves in accordance with 10 CFR 50, Appendix H. Therefore, the surveillance serves no purpose and is removed. This change is designed as administrative as it eliminates a requirement that is duplicative of a requirement in the CFR.</p>	None	4.4.9.1.2
3.4.4 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.4 A.2	<p>CTS 3.4.1.1 states that all reactor coolant loops shall be in operation. ITS 3.4.4 states that three reactor coolant loops shall be OPERABLE and in operation. This changes the CTS by requiring the RCS loops to be OPERABLE.</p> <p>This change is acceptable because it is consistent with the current use and understanding of the LCO. It not sufficient for a loop to be in operation if it is not capable of performing its safety function (i.e., OPERABLE). This change is designated as administrative as it clarifies the current understanding of a requirement.</p>	3.4.4	3.4.1.1
3.4.4 A.3	<p>The Applicability of CTS 3.4.1.1 is MODES 1 and 2 with a footnote stating, "See Special Test Exception 3.10.4." ITS 3.4.4 Applicability does not contain the footnote or a reference to the Special Test Exception.</p> <p>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 editorial as it incorporates an ITS convention with no technical change to the Technical Specifications.</p>	None	3.4.1.1
3.4.5 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 A.2	<p>CTS 3.4.1.2, Unit 2 only, contains a footnote that states that the requirement to have one coolant loop in operation is exempted during the performance of the boron mixing tests as stipulated in License Condition 2.C(15)(f) and 2.C(20)(b). ITS 3.4.5 does not contain this footnote.</p> <p>This change is acceptable because this footnote is no longer applicable. Unit 2 License Condition 2.C(15) contains actions that must be completed prior to resuming power operation following the first refueling outage. License Condition 2.C(15)(f) requires VEPCO to submit for Commission approval the results of the tests applicable to North Anna Power Station, Unit 2, of a study concerning mixing of added borated water and cooldown under natural circulation conditions. Unit 2 License Condition 2.C(20) contains requirements contained in Supplement 11 to the Safety Evaluation Report for the North Anna Power Station, Unit 2, dated August 1980. License Condition 2.C(20)(b) (second paragraph) requires VEPCO to perform a boron mixing and cooldown test using decay heat within 31 days after burnup sufficient to produce at least 10 hours of decay heat equivalent to one percent of rated thermal power. These License Conditions have been completed and the footnote taking an exception to the LCO requirements in order to perform the tests is no longer needed. This change is designated as administrative as it eliminates an exception which is no longer applicable.</p>	None	Unit 2 CTS 3.4.1.2
3.4.6 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.6 A.2	<p>CTS Surveillance 4.4.1.3.1 states that the required RHR subsystems shall be demonstrated OPERABLE per Specification 4.7.9.2. ITS 3.4.6 does not contain this Surveillance.</p> <p>This change is acceptable because the ITS does not contain a specification which is equivalent to Surveillance 4.7.9.2. The disposition of the requirements in Surveillance 4.7.9.2 will be addressed in DOCs for Specification 3.7.9.2. This change is designated as administrative as it eliminates a reference to a specification which does not exist in the ITS. This change is acceptable because the ITS does not contain a specification which is equivalent to Surveillance 4.7.9.2. The disposition of the requirements in Surveillance 4.7.9.2 will be addressed in DOCs for Specification 3.7.9.2. This change is designated as administrative as it eliminates a reference to a specification which does not exist in the ITS.</p>	None	4.4.1.3.1

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.7 A.2	<p>CTS 3.4.1.3 is applicable in MODES 4 and 5. ITS 3.4.6 is applicable in MODE 4, ITS 3.4.7 is applicable in MODE 5 with the RCS loops filled, and ITS 3.4.8 is applicable in MODE 5 with the RCS loops not filled. Editorial changes are made in the division of the CTS requirements to the ITS.</p> <p>This change is designated as editorial because all technical changes resulting from the division of CTS 3.4.1.3 are discussed in other DOCs.</p>	3.4.7	3.4.1.3
3.4.7 A.3	<p>CTS 3.4.1.3 states that with less than the required loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status as soon as possible and be in cold shutdown (MODE 5) within 20 hours. ITS 3.4.7 states that when an RHR loop is inoperable, immediately initiate action to restore a second RHR loop to OPERABLE status. This changes the CTS by eliminating the requirement to be in MODE 5 within 20 hours.</p> <p>This change is acceptable because ITS 3.4.7 is only applicable in MODE 5. Therefore, a requirement to be in MODE 5 is unneeded. This change is designated as administrative because it is an editorial change required by the division of CTS 3.4.1.3 into the ITS</p>	3.4.7	3.4.1.3
3.4.7 A.4	<p>CTS 3.4.1.3 states that two coolant loops shall be OPERABLE, consisting of any combination of RCS and RHR loops. A footnote to the LCO states that the OPERABLE RHR loops may have inoperable offsite or emergency power sources in MODE 5. ITS 3.4.7 does not contain an allowance for an OPERABLE RHR loop to have an offsite or emergency power source inoperable.</p> <p>This change is acceptable because the ITS definition of OPERABLE allows an OPERABLE component to have either a normal or emergency power source. This change to the CTS definition of OPERABLE is discussed in the Section 1.0 Discussion of Change. Given this change to the definition of OPERABLE, a specific allowance for the RHR loops is not required. This change is designated as editorial as it replaces a specific exception with an ITS change in the definition of OPERABLE.</p>	None	3.4.1.3.

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 A.5	<p>CTS 3.4.1.3 is applicable in MODES 4 and 5 and allows any combination of two coolant loops to satisfy the LCO. ITS 3.4.7 is applicable in MODE 5 with the RCS loops filled and requires one RHR loop to be OPERABLE and in operation. ITS 3.4.7 contains a Note which allows all RHR loops to be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation.</p> <p>This change is acceptable because an RCS loop is capable of providing the necessary decay heat removal and reactor coolant flow. The ITS convention of dividing the coolant loop specifications between MODES 4 and 5 requires an allowance in the MODE 5 LCO for the starting of an RCP for heatup to MODE 4. Such an allowance is not needed in the CTS since an RCS loop can be used to satisfy the LCO. This change is designated as administrative because it is an editorial change required by the division of CTS 3.4.1.3 into the ITS.</p>	LCO 3.4.7 Note	3.4.1.3
3.4.7 A.6	<p>CTS Surveillance 4.4.1.3.1 states that the required RHR subsystems shall be demonstrated OPERABLE per Specification 4.7.9.2. ITS 3.4.7 does not contain this Surveillance.</p> <p>This change is acceptable because the ITS does not contain a specification which is equivalent to Surveillance 4.7.9.2. The disposition of the requirements in Surveillance 4.7.9.2 will be addressed in DOCs for that specification. This change is designated as administrative as it eliminates a reference to a specification which does not exist in the ITS.</p>	None	4.4.1.3.1
3.4.8 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.8 A.2	<p>CTS 3.4.1.3 is applicable in MODES 4 and 5 and requires two coolant loops, consisting of any combination of RCS and RHR loops, to be OPERABLE. ITS 3.4.8 is applicable in MODE 5 with the RCS loops not filled. In this condition, the RCS loops cannot be used for decay heat removal and all references to the RCS loops, steam generators, and Reactor Coolant Pumps are removed.</p> <p>This change is acceptable because it does not change the current requirements. With the RCS loops not filled, the RCS loops and the steam generators cannot be used for decay heat removal and cannot be OPERABLE. Therefore, the two RHR loops must be used as the OPERABLE loops in MODE 5 with the loops not filled. This change is designated as administrative because it is an editorial change resulting from the division of CTS 3.4.1.3 in the ITS.</p>	3.4.8	3.4.1.3

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 A.3	<p>CTS 3.4.1.3 is applicable in MODES 4 and 5. ITS 3.4.6 is applicable in MODE 4, ITS 3.4.7 is applicable in MODE 5 with the RCS loops filled, and ITS 3.4.8 is applicable in MODE 5 with the RCS loops not filled. This changes the CTS by dividing the CTS 3.4.1.3 requirements into three specifications with different applicabilities. Editorial changes are made in the division of the CTS requirements to the ITS.</p> <p>This change is designated as administrative because all technical changes resulting from the division of CTS 3.4.1.3 are discussed in other DOCs.</p>	3.4.8	3.4.1.3
3.4.8 A.4	<p>CTS 3.4.1.3 states that with less than the required loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status as soon as possible and be in cold shutdown (MODE 5) within 20 hours. ITS 3.4.8 states that when an RHR loop is inoperable, immediately initiate action to restore a second RHR loop to OPERABLE status. This changes the CTS by eliminating the requirement to be in MODE 5 within 20 hours.</p> <p>This change is acceptable because ITS 3.4.8 is only applicable in MODE 5. Therefore, a requirement to be in MODE 5 is unneeded. This change is designated as administrative because it is an editorial change required by the division of CTS 3.4.1.3 into the ITS.</p>	3.4.8	3.4.1.3
3.4.8 A.5	<p>CTS 3.4.1.3 states that two coolant loops shall be OPERABLE, consisting of any combination of RCS and RHR loops. A footnote to the LCO states that the OPERABLE RHR loops may have inoperable offsite or emergency power sources in MODE 5. ITS 3.4.8 does not contain an allowance for an OPERABLE RHR loop to have an offsite or emergency power source inoperable.</p> <p>This change is acceptable because the ITS definition of OPERABLE allows an OPERABLE component to have either a normal or emergency power source. This change to the CTS definition of OPERABLE is discussed in the Section 1.0 Discussion of Change. Given this change to the definition of OPERABLE, a specific allowance for the RHR loops is not required. This change is designated as editorial as it replaces a specific exception with an ITS generic change.</p>	None	3.4.1.3
3.4.8 A.6	<p>CTS Surveillance 4.4.1.3.1 states that the required RHR subsystems shall be demonstrated OPERABLE per Specification 4.7.9.2. ITS 3.4.8 does not contain this Surveillance.</p> <p>This change is acceptable because the ITS does not contain a specification which is equivalent to Surveillance 4.7.9.2. The disposition of the requirements in Surveillance 4.7.9.2 will be addressed in DOCs for that specification. This change is designated as administrative as it eliminates a reference to a specification which does not exist in the ITS.</p>	None	4.4.1.3.1

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.9 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.9 A.2	<p>CTS 3.4.4 requires that pressurizer water volume be less than or equal to 1240 cubic feet and Surveillance 4.4.4.1 requires verification of the volume every 12 hours. ITS 3.4.9 will require that pressurizer level be every 12 hours.</p> <p>This change is acceptable because the CTS limit and the ITS limit are the same. The ITS presents the pressurizer limit in the scale displayed in the Control Room. Pressurizer volume is displayed as a percent of level on Control Room instrumentation. This change is designated as administrative as the units of the limit are changed but the value of the limit is not affected.</p>	3.4.9 and SR 3.4.9.1	3.4.4 and 4.4.4.1
3.4.9 A.3	<p>CTS 3.4.4, action b, applies when the pressurizer is inoperable for reasons other than inoperable group of pressurizer heaters. ITS 3.4.9, Condition A, applies when the pressurizer water level is not within limit. Changes to CTS 3.4.4, action a, to make it applicable to all causes of pressurizer heater inoperability are discussed in DOC L.1.</p> <p>The purpose of CTS 3.4.4 is to require the pressurizer to be OPERABLE and two conditions of OPERABILITY are supplied. The conditions are pressurizer water level and pressurizer heater OPERABILITY. CTS 3.4.4, action b, applies when water level is not within limit. This is the same condition for which ITS 3.4.9, Condition A applies. The Actions in CTS 3.4.4, action b, and ITS 3.4.9, Action A are the same, except as described in DOC L.1. This change is acceptable because the remaining conditions under which the actions in CTS 3.4.4, action b, apply have not changed. This change is designated as administrative as it results in no technical change to the specifications.</p>	3.4.9 Condition A	3.4.4 Action b
3.4.10 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 A.2	<p>CTS Surveillances 4.4.3.1 and 4.4.2 state that there are no Surveillance Requirements on the pressurizer safety valves other than those required by Specification 4.0.5. Specification 4.0.5 describes the Inservice Test requirements. ITS SR 3.4.10.1 states that it must be verified that each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program and, following testing, lift settings shall be within <math>\pm 1\%</math>.</p> <p>This change is acceptable because the requirements have not changed. Both the CTS and the ITS state that the safety valves must be tested in accordance with the Inservice Testing Program. The ITS requirement that the as-left lift settings must be within <math>\pm 1\%</math> is moved from CTS LCO 3.4.3.1 and 3.4.2. This change is designated as administrative as the technical requirements are not changed.</p>	SR 3.4.10.1	4.4.2 and 4.4.3.1
3.4.10 A.3	<p>CTS 3.4.2 requires a minimum of one pressurizer code safety valve to be OPERABLE with a lift setting of 2485 psig <math>\pm 3\%</math> as-found. ITS 3.4.10 requires three pressurizer code safety valves to be OPERABLE with a lift setting of 2485 psig, <math>+2\% / -3\%</math> average with no single valve outside of <math>\pm 3\%</math>. The requirement for three safety valves to be OPERABLE in MODE 4 is described in DOC M.3.</p> <p>This change is acceptable because it results in no technical change to the requirement. In both the CTS and the ITS, any single valve is required to have a lift setting within <math>\pm 3\%</math> of 2485 psig. The limitation on average lift setting is taken from CTS LCO 3.4.3.1 and only applies under the ITS requirement for all three safety valves to be OPERABLE. This change is designated as administrative as it is a non-technical change required for consistency with another change.</p>	3.4.10	3.4.2
3.4.11 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A.2	<p>CTS 3.4.3.2 describes the Actions to be taken when a PORV or block valve is inoperable. ITS 3.4.11 also describes Actions to be taken when a PORV or block valve is inoperable and contains a statement that separate condition entry is allowed for each PORV and each block valve.</p> <p>This change is acceptable because the CTS is interpreted as Action A may be entered for each valve separately. It does not result in a technical change to the Technical Specifications. This change is designated as administrative as it is a change required by the ITS usage rules that does not result in a technical change to the specifications.</p>	3.4.11	3.4.3.2
3.4.11 A.3	<p>CTS 3.4.3.2, Action A.1, applies with one or both PORV(s) inoperable solely because of excessive seat leakage. CTS 3.4.3.2, Action A.2, applies with one or both PORV(s) inoperable because of an inoperable backup nitrogen supply. CTS 3.4.3.2, Action A.4, applies with one PORV inoperable due to causes other than those addressed in Actions A.1, A.2, or A.3. CTS 3.4.3.2, Action A.5, applies with both PORVs inoperable such that Actions A.1, A.2, or A.3 above do not apply. ITS 3.4.11 ACTIONS divide the conditions of PORV inoperability into those in which the PORV is capable of being manually cycled and those which do not. ITS 3.4.11, Action A applies with one or more PORVs inoperable due to inoperable backup nitrogen supply and capable of being manually cycles. ITS 3.4.11, Action B, applies with one or more PORV inoperable for reasons other than Condition A and capable of being manually cycled. ITS 3.4.11, Action C, applies with one PORV inoperable and not capable of being manually cycled. ITS Action F applies with two PORVs inoperable and not capable of being manually cycled. This changes the CTS by dividing the existing conditions into those in which the PORV can, and cannot, be manually cycled.</p> <p>This change is acceptable because the requirements have not changed. A PORV inoperable due to excessive seat leakage can still be manually cycled. A PORV inoperable due to an inoperable backup nitrogen supply can still be manually cycled. PORVs inoperable for other reasons cannot be manually cycled. Therefore, the conditions under which the Required Actions are applied have not changed. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	3.4.11 Actions A, Action B, Action C and Action F	3.4.3.2 Action A.1, Action A.2, Action A.4 and Action A.5

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A.4	<p>CTS 3.4.3.2, Action B.1, states that with one block valve inoperable, within 1 hour either restore the block valves to OPERABLE status or place the PORVs in manual control; restore the block valve to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. CTS 3.4.3.2, Action B.2, states that with both block valves inoperable, within 1 hour either restore the block valves to OPERABLE status or place the PORVs in manual control; restore at least one block valve to OPERABLE status within the next hour, and restore the remaining inoperable block valve to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. ITS 3.4.11, Action D, states that with one block valve inoperable, place the associated PORV in manual control and restore the block valve to OPERABLE status within 72 hours. ITS 3.4.11, Action G, states that with two block valves inoperable, restore one block valve to OPERABLE status within 2 hours. This changes the CTS by eliminating the actions for one block valve inoperable in the Condition for two block valves inoperable.</p> <p>This change is acceptable because the requirements have not changed. Under the rules of the ITS, all applicable Conditions are entered. Therefore, with two block valves inoperable, the Conditions and Required Actions for one block valve inoperable must also be followed. As a result, it is not necessary to repeat those Required Actions in the Condition for two block valves inoperable. This change is designated as administrative as it is a change required by the ITS usage rules that does not result in a technical change to the specifications.</p>	3.4.11 Action D and Action G	3.4.3.2 Action B.1 and Action B.2
3.4.12 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.12 A.2	<p>CTS 4.4.9.3.d states that each PORV shall be demonstrated OPERABLE by testing pursuant to Specification 4.0.5. ITS 3.4.12 does not contain a similar requirement.</p> <p>This change is acceptable because Specification 4.0.5 applies whether or not it is specifically invoked in a particular specification. A requirement to follow Specification 4.0.5 in CTS 4.4.9.3.d is repetitious and adds no requirements. Therefore, it is deleted. Changes to Specification 4.0.3 are discussed in the ITS Section 3.0 DOCs.</p>	None	4.4.9.3.d

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.13 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.13 A.2	<p>CTS LCO 3.4.6.2.c states that the RCS leakage shall be limited to 1 GPM total primary-to-secondary leakage through all steam generators not isolated from the Reactor Coolant System and 500 gallons per day through any one steam generator not isolated from the Reactor Coolant System. ITS 3.4.13 contains the same limits on primary-to-secondary leakage, but does not contain the qualification that the steam generators must not be isolated from the RCS.</p> <p>This change is acceptable because under the ITS the steam generators cannot be isolated from the RCS in the MODES in which ITS 3.4.13 applies and, therefore, the qualification is unnecessary. ITS 3.4.17 requires that the loop isolation valves be open in MODES 1 – 4, which is also the Applicability of ITS 3.4.13. This change is designated as administrative as it eliminates a requirement which has been superceded by another change to the Specifications.</p>	None	3.4.6.2.c
3.4.13 A.3	<p>CTS LCO 3.4.13.c contains an asterisk reference to a footnote which states that CTS Specification 3.4.6.3 applies when in MODE 1 above 50% power. ITS Specification 3.4.13 does not contain this footnote.</p> <p>This change is acceptable because the ITS format eliminates informational references to other Specifications. Such references do not impose or change requirements and are, therefore, unnecessary. This change is designated as administrative as it eliminates a reference which contains no requirements.</p>	None	3.4.13.c footnote

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.13 A.4	<p>CTS 4.4.5.0 states, "Each steam generator shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the required Specification 4.0.5." ITS SR 3.4.13.2 states that the RCS operational leakage must be verified to be within limits in accordance with the Steam Generator Tube Surveillance Program. This changes the CTS by changing the reference to the required testing from the testing in CTS 3.4.5 and Specification 4.0.5 to the Steam Generator Tube Inspection Program in the ITS Administrative Controls.</p> <p>The purpose of SR 3.4.13.2 is to provide a link to the Steam Generator Tube Surveillance Program in the Administrative Controls. The ITS moves the Steam Generator tube inspection from CTS 3.4.5 to a program in the Administrative Controls section. This change is acceptable because it creates an administrative reference to the Steam Generator Tube Surveillance Program and does not, of itself, impose any new requirements. Differences between CTS 3.4.5 and the Steam Generator Tube Surveillance Program are discussed in ITS Section 5.0. In both the CTS and the ITS, discovery while in MODES 1 – 4 that the steam generators have not been inspected in accordance with the stated requirements results in entry into LCO 3.0.3. Therefore, adding this Surveillance imposes no new requirements. This change is designated as administrative because it does not result in a technical change to the Specifications.</p>	SR 3.4.13.2	4.4.5.0
3.4.14 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.14 A.2	<p>ITS 3.4.14 contains ACTION Note 2 which states, "Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV." CTS 3.4.6.2 does not specifically state a similar requirement.</p> <p>This change is acceptable because it does not change the intent or application of the Specification. The CTS definition of OPERABLE requires declaring equipment inoperable if it is incapable of performing its safety function. This Note makes clear that ITS LCO 3.0.6 cannot be invoked in this case and systems rendered inoperable due to a leaking PIV or a flow path closed to isolate a leaking PIV must be declared inoperable and the applicable Conditions and Required Actions must be taken. This change is designated as administrative because it does not change the intent of the specification.</p>	3.4.14 Action Note 2	None

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A.3	<p>CTS Surveillances 4.4.6.2.2.b and Unit 1 CTS Surveillance 4.4.6.2.2.a require testing of RCS PIVs prior to entering MODE 2. Unit 2 CTS Surveillance 4.4.6.2.2.a requires testing every 18 months. However, Surveillance 4.4.6.2.2.b can be used to meet this Surveillance, so the exception to enter MODES 3 and 4 prior to performing the testing applies. ITS SR 3.4.14.1 contains a Note which states that RCS PIV testing is not required to be performed in MODES 3 and 4.</p> <p>This change is acceptable because it applies a general Note to the Surveillance instead of exceptions on each Frequency of the Surveillance. This change is designated as administrative because it does not result in a technical change to the Specifications.</p>	SR 3.4.14.1 Note	4.4.6.2.2.a and 4.4.6.2.2.b
3.4.14 A.4	<p>Unit 1 CTS Surveillance 4.4.6.2.2.a requires testing of RCS PIVs prior to entering MODE 2 after each refueling. Unit 2 CTS 4.4.6.2.2 requires testing of RCS PIVs in accordance with 4.0.5 (the Inservice Testing Program) and every 18 months. ITS SR 3.4.14.1 requires testing of RCS PIVs in accordance with the Inservice Testing (IST) Program and every 18 months.</p> <p>This change is acceptable because it does not change the testing Frequency of the RCS PIVs. The Unit 1 and Unit 2 RCS PIVs are tested under the IST program. Stating that the valves must be tested on a Frequency specified in the IST program does not impose any new requirement. The North Anna refueling interval is 18 months. Requiring testing every 18 months and requiring testing after each refueling does not change the test Frequency. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	SR 3.4.14.1	Unit 1 4.4.6.2.2.a and Unit 2 4.4.6.2.2
3.4.15 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS. These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 A.2	<p>CTS 3.4.6.1 does not include an explicit requirement to enter LCO 3.0.3 when all required monitors are inoperable. ITS 3.4.15 Required Action D.1 requires entering LCO 3.0.3 when all required monitors are inoperable. This changes CTS by adding a Required Action explicitly requiring entry into LCO 3.0.3, while the CTS would also require entry into LCO 3.0.3 based on not meeting the LCO and not having an explicit Condition to enter.</p> <p>This change is acceptable because entry into LCO 3.0.3 would be required with or without the Required Action. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.4.15 Action D.1	None
3.4.15 A.3	<p>CTS 3.4.6.1.b states, "The following Reactor Coolant System leakage detection systems shall be OPERABLE: ...b. The containment sump level and discharge flow measurement system." ITS 3.4.15.a states, "The following RCS leakage detection instrumentation shall be OPERABLE: a. One containment sump (level or discharge flow) monitor;..." This changes CTS by more explicitly stating that any one of the components in the system is capable of monitoring the containment sump for Reactor Coolant System leakage.</p> <p>The purpose of CTS 3.4.6.1.b is to provide assurance that the containment sump level and discharge flow measurement system can provide an indication of Reactor Coolant System leakage. The system described in CTS 3.4.6.1.b consists of two containment sump level monitors and a containment sump discharge flow totalizer. Any one of these components can perform the function of the system. ITS 3.4.15.a explicitly states that either the containment (sump or discharge flow) monitors can perform the function. This change is acceptable because the existing requirement is retained but clarified. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.4.15.a	3.4.6.1.b
3.4.16 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.17 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.17 A.2	<p>CTS 3.4.1.1 states that all reactor coolant loops shall be in operation with power removed from the loop stop valve operators. ITS 3.4.4 states that all reactor coolant loops shall be OPERABLE and in operation. ITS 3.4.17 states that all RCS hot and cold leg loop isolation valves shall be open with power removed from each isolation valve operator. This changes the CTS by dividing the existing LCO requirements into two LCOs.</p> <p>This change is designated as administrative as it is editorial resulting in no technical change to the Technical Specifications.</p>	3.4.17	3.4.1.1
3.4.17 A.3	<p>ITS 3.4.17 Actions are modified by a Note that states that separate condition entry is allowed for each RCS loop isolation valve. CTS does not contain this allowance.</p> <p>This change is acceptable because the CTS does not provide any Actions pertaining to the loop isolation valves. The Note modifies the Actions added to the CTS as described in L.1 and M.2. The addition of the Note itself results in no changes to the CTS except as related to the addition of the ITS Actions. This change is designated as administrative as it is an editorial change related to other described changes</p>	3.4.17 Actions Note	None
3.4.18 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.18 A.2	<p>CTS 3.4.1.4 provides requirements on the boron concentration of an isolated loop in MODES 3, 4 and 5. CTS 3.4.1.5 provides requirements on opening a cold leg stop valve in all MODES. ITS 3.4.18 provides requirements on the startup of an isolated loop and is applicable in MODES 5 and 6. ITS 3.4.18 also refers to the minimum boron concentration requirements in MODE 6 imposed by LCO 3.9.1.</p> <p>This change is acceptable because the condition the Specifications control is only allowed in MODES 5 and 6. ITS 3.4.17 requires the RCS loop isolation valves to be open with power removed to the valve operator in MODES 1, 2, 3, and 4. Therefore, requirements on the startup of an inactive loop are not applicable in those MODES. Referencing the boron concentration requirements in LCO 3.9.1 is necessary because the CTS LCO 3.1.1 and 3.1.2 do not apply in MODE 6. LCO 3.9.1 provides an equivalent requirement in MODE 6. This change has been designated as administrative as it is editorial resulting from changes justified in other specifications.</p>	3.4.18	3.4.1.4 and 3.4.1.5
3.4.18 A.3	<p>CTS 3.4.1.5 states, in part, that a reactor coolant loop cold leg stop valve shall remain closed until the reactor is subcritical by at least 1.77% <math>\Delta k/k</math>. ITS 3.4.18 does not contain this requirement.</p> <p>This change is acceptable because the shutdown margin requirement in CTS 3.4.1.5 is redundant. ITS 3.4.18 is applicable in MODES 5 and 6 with RCS loop(s) isolated. CTS 3.1.1.2 and ITS 3.1.1 require the shutdown margin to be <math>\geq 1.77\% \Delta k/k</math> when in MODE 5. CTS 3.9.1 and ITS 3.9.1 require the reactor to be shutdown by greater than 1.77% <math>\Delta k/k</math> when in MODE 6. Therefore, the CTS 3.4.1.5 shutdown margin requirement is redundant to these other, more broadly applicable, specifications and is not needed. Changes to CTS 3.1.1.2 or CTS 3.9.1 will be addressed in the DOCs for those Specifications. This change is designated as administrative as it eliminates a redundant requirement from the CTS.</p>	None	3.4.1.5

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.18 A.4	<p>CTS 3.4.1.5 states that a reactor coolant loop cold leg stop valve shall remain closed until certain requirements are met. The CTS 3.4.1.5 Action states that with the requirements of the specification not satisfied, suspend startup of the isolated loop. ITS 3.4.18, Action C.1, states that with the isolated loop hot or cold leg isolation valve open with LCO requirements not met, close the cold leg isolation valve immediately.</p> <p>This change is acceptable because the actions taken if the LCO is not met have not changed. Actions are only entered if the LCO is not met. In order for the CTS 3.4.1.5 LCO, which states, "a reactor coolant loop cold leg stop valve shall remain closed until ..." to not be met, the cold leg stop valve must be opened without meeting the requirements in the LCO. The action taken under the CTS to "suspend startup of the isolated loop" is to immediately close the cold leg isolation valve, which is the same action required by the ITS in this condition. This change is designated as administrative as it does not result in a technical change to the specifications.</p>	3.4.18 Action C.1	3.4.1.5
3.4.18 A.5	<p>The LCO Note to CTS LCO 3.4.1.5 states that if a cold leg stop valve is closed for maintenance or testing and not reopened with 2 hours, A.C. power is to be removed from the valve and the breaker locked open. This changes the CTS by not requiring that A.C. power be removed from the valve. The change regarding locking the breaker open is discussed in DOC L.3.</p> <p>This change is acceptable because the CTS requirement to remove A.C. power from the valve operator is located in the ITS LCO. The ITS LCO requires each isolated loop to remain isolated with power removed from the valve operators. The ITS LCO Note requires the loop to be isolated. Therefore, the ITS LCO Note and the LCO require the loop to be isolated and power to be removed from the valve operators. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	None	3.4.1.5 Note
3.4.18 A.6	<p>CTS LCO 3.4.1.6 requires that the pressurizer water volume be at least 450 cubic feet prior to filling a drained, isolated loop from the active volume of the RCS. CTS Action b addresses this limit not being met and Surveillance 4.4.1.6.2 verifies this volume. ITS LCO 3.4.18 requires pressurizer level to be pressurizer level not being met and SR 3.4.18.6 verifies this level is met. This changes the CTS by substituting an equivalent pressurizer level for the pressurizer volume contained in the CTS.</p> <p>This change is acceptable because there is no direct indication of pressurizer water volume in the Control Room. Pressurizer water volume is calculated from the pressurizer level. Under the conventions of the ITS, values such as this should be in the units measured in the Control Room, including applicable uncertainties. This change is designated as administrative because they do not result in technical changes to the specifications.</p>	3.4.18 , Action C and SR 3.4.18.6	3.4.1.6

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.18 A.7	<p>CTS 3.4.1.6, Action b, states that if pressurizer water volume is not maintained above the limit, the loop stop valves must be closed. Action b also requires that A.C. power be removed from the loop stop valves and the breakers be locked open. ITS 3.4.18, Action D applies in the same circumstance and requires that the isolation valves be closed. This changes the CTS by not requiring that A.C. power be removed from the valve. The change regarding locking the breaker open is discussed in DOC L.3.</p> <p>This change is acceptable because the CTS requirement to remove A.C. power from the valve operator is located in the ITS LCO. The ITS LCO requires each isolated loop to remain isolated with power removed from the valve operators. The ITS Action requires the loop to be isolated. Therefore, the ITS Action and the LCO require the loop to be isolated and power to be removed from the valve operators. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	3.4.18 Action D	3.4.1.6 Action b
3.4.18 A.8	<p>CTS 3.4.1.6.a.3 requires a source range neutron flux monitor to be OPERABLE in MODES 5 and 6 during the filling of an isolated and drained portion of the RCS from the active RCS volume. The ITS does not contain this requirement.</p> <p>This change is acceptable because a source range neutron flux monitor is required to be OPERABLE in MODES 5 and 6 by other Specifications in the ITS. ITS 3.3.1, Table 3.3.1-1, Item 5, requires a source range neutron flux monitor be OPERABLE in MODE 5 (both with and without the reactor trip breakers open) and ITS 3.9.3 requires two source range neutron flux monitors to be OPERABLE in MODE 6. Therefore, the CTS requirement is duplicative and unnecessary. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	None	3.4.1.6.a.3
3.4.18 A.9	<p>CTS 3.4.1.6, Action c and e state if the requirement is not met, the loop shall be isolated and drained or apply Specification 3.4.1.4 and 3.4.1.5. ITS 3.4.18, Action E, applies in the same conditions and states the valves are to be closed immediately. This changes the CTS by eliminating the requirement that the loop be drained or Specifications 3.4.1.4 and 3.4.1.5 be applied.</p> <p>This change is acceptable because the requirements have not been changed. Under the CTS, once a loop is isolated the requirements of Specification 3.4.1.4, 3.4.1.5, or 3.4.1.6 apply. Under the ITS, once a loop is isolated, the requirements of 3.4.18 apply. CTS 3.4.1.4, 3.4.1.5, and 3.4.1.6 describe the controls on starting a loop, as does ITS 3.4.18. Therefore, the requirements have not changed except as described in other DOCS for ITS 3.4.18. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	3.4.18 Action E	3.4.1.6 Actions c and e

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.19 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.4.19 A.2	<p>CTS 3.10.4 is applicable during operation below the P-7 Interlock Setpoint. LCO 3.4.19 is applicable in MODES 1 and 2 during startup and PHYSICS TESTS.</p> <p>The purpose of CTS 3.10.4 is to allow all Reactor Coolant Pumps (RCPs) to be stopped while at low reactor power to allow natural circulation testing. LCO 3.4.19 serves the same purpose. This testing is performed with reactor power less than 10% RTP to ensure that the fuel design limits are not exceed. Should power exceed the P-7 Interlock Setpoint (10% RTP), a low flow reactor trip signal (which is bypassed below the P-7 setpoint) would open the reactor trip circuit breakers and the reactor would be shutdown. This change is acceptable because the Applicability of CTS 3.10.4 and ITS LCO 3.4.19 serve the same purpose. Both allow the testing to be performed. However, the CTS 3.10.4 Applicability could be interpreted to be in conflict with the Action. Specifically, should reactor power exceed the P-7 Interlock Setpoint, the CTS Applicability is exited, and the Condition of the Action, power greater than P-7, is never entered. The ITS Applicability, MODE 1 and 2 during startup and PHYSICS TESTS, allows the appropriate Action to be entered should power exceed the P-7 Interlock Setpoint. This is how the CTS Action is currently interpreted and implemented. This change is designated as administrative as it is a clarification of the current understanding of a requirement.</p>	3.4.19	3.10.4
3.4.19 A.3	<p>CTS 4.10.4.2 requires that a CHANNEL FUNCTIONAL TEST be performed on each Intermediate and Power Range channel and P-7 Interlock. ITS SR 3.4.19.2 requires that a CHANNEL OPERATIONAL TEST be performed on that equipment.</p> <p>This change is acceptable because, for this equipment, a CTS CHANNEL FUNCTIONAL TEST and an ITS CHANNEL OPERATIONAL TEST are the same. The ITS renamed the CHANNEL FUNCTIONAL TEST to CHANNEL OPERATIONAL TEST and separated some of the functions to other definitions. That separation does not affect this change. Therefore, this change is editorial. The change is designated as administrative as it changes the name of a test with no change in intent.</p>	SR 3.4.19.2	4.10.4.2

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.19 A.4	<p>CTS 3.10.4 states that the limitations of Specification 3.4.1.1 may be suspended during the performance of startup and PHYSICS TESTS provided the THERMAL POWER does not exceed the P-7 Interlock Setpoint and the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set <math>\leq 25\%</math> of RATED THERMAL POWER, respectively. ITS 3.4.19 states that the requirement of LCO 3.4.4, "RCS Loops - MODES 1 and 2," may be suspended with THERMAL POWER &lt; P-7. This changes the CTS by eliminating the requirement that the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set <math>\leq 25\%</math> of RATED THERMAL POWER, respectively.</p> <p>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 this 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.</p>	None	3.10.4
CTS 3.7.9.2 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

Table A – Administrative Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
<p>CTS 3.7.9.2  A.2</p>	<p>CTS 3.7.9.2 Action states that when an RHR subsystem is inoperable, it must be immediately restored to OPERABLE status or RCS temperature must be maintained below 350°F by alternate heat removal methods. It also states that the provisions of Specifications 3.0.3, 3.0.4, and 4.0.4 are not applicable. ITS 3.4.6 Actions do not contain exceptions to these specifications. Other changes to the CTS 3.7.9.2 Action are described in L.5.</p> <p>This change is acceptable as it results in no technical changes to the Specifications. Under the CTS, if an RHR subsystem is not restored immediately or RCS temperature is not kept below 350°F, no 3.0.3 entry is required and, as a result, a shutdown to a lower mode is not required. Under the ITS, if a required RHR subsystem is inoperable, actions must be initiated to restore a second coolant loop to OPERABLE status but no shutdown to a lower mode is required. Therefore, eliminating the explicit 3.0.3 exception does not result in a technical change to the Technical Specifications. Under the CTS, if an RHR subsystem is inoperable, Specifications 3.0.4 and 4.0.4 are not applicable and, therefore, MODE changes are not prohibited. However, the CTS Action requires RCS temperature to be kept below 350°F, which are the entry conditions for the next higher MODE. Therefore, under the CTS, MODE changes to a higher MODE are prohibited without reliance on Specifications 3.0.4 or 4.0. With a required RHR loop inoperable, ITS 3.0.4 also prohibits transition to a higher mode. This change is designated as administrative as it eliminates allowances that are provided by other means in the ITS.</p>	<p>None</p>	<p>3.7.9.2</p>

Table L – Less Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.11 L.2	CTS 3.4.3.2, Action B, applies when one or both block valves are inoperable. ITS 3.4.11, Action D and G, apply when one or both block valves, respectively, are inoperable. ITS 3.4.11, Actions D and G, are modified by a Note which states that the Required Actions are not applicable when the block valve is inoperable solely as a result of complying with Required Actions C.2 and F.2. ITS Required Actions C.2 and F.2 require power to be removed from the block valve and apply when the associated PORV is inoperable. This changes the CTS by eliminating the requirement to declare the block valve inoperable when power is removed because the associated PORV is inoperable.	None	3.4.3.2 Action B	4
3.4.11 L.3	CTS 3.4.3.2, Action A.3, states, "With one or both PORV(s) inoperable due to a malfunction in the PORV automatic control system, within 1 hour restore the affected automatic control system(s) to OPERABLE status or place and maintain the affected PORV(s) in manual control. --- ITS 3.4.11 does not require the PORV automatic control system for OPERABILITY. This changes the CTS by eliminating the LCO requirement and SRs for the PORV automatic control system.	None	3.4.3.2 Action A.3	1
3.4.11 L.4	CTS 4.4.3.2.2 states that each block valve shall be cycled unless the block valve is closed in order to meet the requirements of ACTION A.4 or A.5. ACTIONS A.4 and A.5 require the block valve to be closed for reasons other than excessive PORV seat leakage. ITS SR 3.4.11.2 states that each block valve shall be cycled, but it is modified by a Note stating that the SR is not required to be performed with the block valve closed in accordance with the Required Actions. This changes the CTS by not requiring a cycle of the block valve when the block valve is closed due to excessive PORV seat leakage.	SR 3.4.11.2	4.4.3.2.2	7

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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

Table L – Less Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.13 L.2	CTS Surveillances 4.4.6.2.1.a, 4.4.6.2.1.b, and 4.4.6.2.1.e require monitoring of the containment atmosphere particulate radioactivity monitor and the containment sump inventory and discharge every 12 hours, and the reactor head flange leakoff temperature every 24 hours. The ITS does not contain these Surveillance Requirements. This changes the CTS by eliminating these Surveillance Requirements.	None	4.4.6.2.1.a, 4.4.6.2.1.b, and 4.4.6.2.1.e	5
3.4.14 L.1	CTS 3.4.6.2 is applicable in MODES 1, 2, 3, and 4. ITS 3.4.14 is applicable in MODES 1, 2, and 3, and MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. SR 3.4.14.1, Note 2, exempts RHR PIVs from the leakage surveillance when in the shutdown cooling mode of operation. This changes CTS by exempting the RHR isolation PIVs from the leakage requirements when those valves are open.	3.4.14: Applicability and SR 3.4.14.4-1Note 2	3.4.6.2	2
3.4.14 L.2	CTS 3.4.6.2 does not contain an ACTION for more than one flow path with RCS PIVs inoperable. In this condition, entry into LCO 3.0.3 is required. ITS 3.4.14 contains ACTION Note 1 which allows separate condition entry for each flow path. This changes the CTS by allowing the Completion Times to apply to each flow path and prevents an LCO 3.0.3 entry should more than one RCS PIV flow path be inoperable.	3.4.14 Action Note 1	3.4.6.2	4

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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

Table L – Less Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.18 L.4	CTS 3.4.1.6.c.2 states that the source range neutron flux count rate shall be no more than a factor of 2 above the initial count rate during the filling of a drained RCS loop from the active volume of the RCS. CTS 3.4.1.6 Action d, states that if the source range count rate increase by a factor of two over the initial count rate, then the loop stop valves must be closed, power removed, and the breakers locked open. Furthermore, it states that no attempt shall be made to reopen the loop stop valves until the reason for the count rate increase has been determined. The ITS does not contain these requirements. This changes the CTS by eliminating the requirement to maintain count rate a less than twice the initial count rate and the corresponding Action.	None	3.4.1.6.c.2 and 3.4.1.6 Action d	1
3.4.19 L.1	CTS 4.10.4.2 requires that tests be performed on each Intermediate and Power Range channel and P-7 Interlock within 12 hours prior to initiating startup or PHYSICS TESTS. ITS SR 3.4.19.2 requires that the testing be performed prior to initiation of startup and PHYSICS TESTS. This changes the CTS by eliminating the time period prior to initiation of startup and PHYSICS TESTS within which the testing must be performed.	NoneSR 3.4.19.2	4.10.4.2	7
CTS 3.7.9.2 L.1	CTS Surveillance 4.7.9.2.c.2 requires each RHR pump in the subsystem flowpath to be verified OPERABLE per Specification 4.0.5. The ITS does not contain this Surveillance.	None	4.7.9.2.c.2	5

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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

Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 None	N/A	N/A	N/A
3.4.2 None	N/A	N/A	N/A
3.4.3 M.1	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS; determine that the RCS remains acceptable for continued operations or be in at least hot standby within the next 6 hours and reduce the RCS T <sub>avg</sub> and pressure to less than 200°F and 500 psig, respectively, within the following 30 hours. ITS 3.4.3, Condition C, states that with the requirements of the LCO not met any time in other than in MODE 1, 2, 3, or 4, initiate immediate action to restore the parameter(s) to within limits and determine the RCS is acceptable for continued operation prior to entering MODE 4. This changes the CTS by requiring immediate action to restore the parameters to within limits when the LCO is not met any time in other than MODE 1, 2, 3, or 4 when the CTS allows 30 minutes to restore parameters.	3.4.3 Condition C	3.4.9.1
3.4.3 M.2	CTS 3.4.9.1 Action states that if the P/T limits are exceeded, an evaluation must be performed to determine if the RCS remains acceptable for continued operation. No time limit is given for the performance of this evaluation. ITS 3.4.3, Actions A.2 and C.2 states that when the LCO is not met, an evaluation to be performed to determine if the RCS is acceptable for continued operation within 72 hours.	3.4.3 Actions A.2 and C.2	3.4.9.1
3.4.4 None	N/A	N/A	N/A
3.4.5 M.1	CTS 3.4.1.2, Action a, states that when less than the two required reactor coolant loops are OPERABLE, the required loop must be restored to OPERABLE status within 72 hours. CTS 3.4.1.2, Action b, states that when no reactor coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required loop to operation. ITS 3.4.5, Action A, states that when one of the two required RCS loops is inoperable, it must be restored within 72 hours. Action C states that if two required RCS loops are inoperable or the required RCS loop(s) are not in operation, the Rod Control System must be placed in a condition incapable of rod withdrawal, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended, and action must be immediately initiated to restore one RCS loops to operable status and operation. This changes the CTS by revising the actions to be taken if both required RCS loops are inoperable. The change in the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 is described in DOC L.1.	3.4.5 Actions A and C	3.4.1.2

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Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M.2	CTS 3.4.1.2 requires two reactor coolant loops to be OPERABLE with each loop consisting of an RCS loop, its associated steam generator, and the reactor coolant pump. CTS 3.4.1.2 does not contain any OPERABILITY requirements for the steam generator. ITS SR 3.4.5.2 requires verification that each required steam generator has a secondary side water level $\geq 17\%$ (narrow range instrumentation) every 12 hours.	SR 3.4.5.2	3.4.1.2
3.4.5 M.3	CTS 3.4.1.2 states that at least two reactor coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by a note that states that all reactor coolant pumps may be de-energized for up to 1 hour. ITS 3.4.5 contains the same allowance, but limits the use of the 1 hour exception to once per 8 hour period.	3.4.5	3.4.1.2
3.4.6 M.1	CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b, states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. ITS 3.4.6, Action A applies when one of the required coolant loops is inoperable. ITS 3.4.6, Action B, states that if two of the required coolant loops are inoperable or the required loop is not in operation, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended, and action must be immediately initiated to restore one coolant loop to operable status and operation. This changes the CTS by revising the actions to be taken if both required coolant loops are inoperable. Both the CTS and the ITS require immediate initiation of corrective action to return the required loops to OPERABLE status. The change in the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 is described in DOC L.3.	3.4.6 Actions A and B	3.4.1.3 Actions a and b
3.4.6 M.2	CTS 3.4.1.3 states that at least two coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by a note that states that all reactor coolant pumps and residual heat removal pumps may not be in operation for up to 1 hour. ITS 3.4.6 contains the same allowance, but limits the use of the 1 hour exception to once per 8 hour period.	3.4.6	3.4.1.3
3.4.6 M.3	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.6.3 requires verification that correct breaker alignment and indicated power are available to the required pump not in operation. LCO 3.4.6 allows a combination of reactor coolant pumps and RHR pumps. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps which are not in operation.	SR 3.4.6.3	4.4.1.3.2

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Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M.1	CTS 3.4.1.3 states that two coolant loops must be OPERABLE in MODES 4 and 5 and one loop must be in operation. The coolant loops may be any combination of RCS loops and RHR loops. ITS 3.4.7 states that one RHR loop must be OPERABLE and in operation in MODE 5 and an additional loop, consisting of another OPERABLE RHR loop or a steam generator filled to at least 17%, must be available. This changes the CTS by requiring one RHR loop to be OPERABLE and in operation in MODE 5 when an RCS or RHR loop is allowed by the CTS. The change to RCS loop requirements is described in L.1.	3.4.7.b	3.4.1.3.
3.4.7 M.2	CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b, states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. ITS 3.4.7, Action A applies when one required RHR loop is inoperable and one RHR loop is OPERABLE <del>or when one or more required steam generator secondary side water levels are not within limits and one RHR loop is OPERABLE</del> and requires immediate action to restore the RHR or steam generator. ITS 3.4.7, Action B states that when one or more required SGs secondary side water levels are not within limits and one RHR loop is OPERABLE, action must be taken to restore a second RHR loop to OPERABLE status or to restore the SG secondary side water level within limit immediately. ITS 3.4.7, Action C, states that if no required RHR loops are OPERABLE or if the required RHR loop is not in operation, all operations cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1 be suspended and action must be immediately initiated to restore one RHR loop to OPERABLE status and operation. This changes the CTS by revising the actions to be taken if both RHR loops are inoperable. The change in the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 is described in DOC L.4.	3.4.7 Actions A, B and C	3.4.1.3 Actions a and b
3.4.7 M.3	CTS 3.4.1.3 states that at least two coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by a note that states that all reactor coolant pumps and residual heat removal pumps may be de-energized for up to 1 hour. ITS 3.4.7 also allows the RHR pumps to be stopped for 1 hour, but limits the use of the 1 hour exception to once per 8 hour period.	3.4.7	3.4.1.3

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Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M.4	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.7.3 requires verification that correct breaker alignment and indicated power are available to the required RHR pump not in operation. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation.	SR 3.4.7.3	4.4.1.3.2
3.4.8 M.1	CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b, states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. ITS 3.4.8, Action A applies when one required RHR loop is inoperable and requires immediate action to restore the RHR loop to OPERABLE status. ITS 3.4.8, Action B, states that if no required RHR loops are OPERABLE or the required RHR loop is not in operation, all operations involving a reduction in RCS boron concentration must be suspended and action must be immediately initiated to restore one RHR loop to OPERABLE status and operation. This changes the CTS by revising the actions to be taken if both RHR loops are inoperable from immediate initiation of corrective action to return the required loops to OPERABLE status to take immediate action to suspend RCS boron concentration reductions and restore an RHR loop to OPERABLE status and operation.	3.4.8 Actions A and B	3.4.1.3, Actions a and b
3.4.8 M.2	CTS 3.4.1.3 contains an allowance for all reactor coolant pumps or RHR pumps to be de-energized for up to one hour. ITS 3.4.8 allows all RHR pumps to be removed from operation for $\leq 15$ minutes for switching from one loop to the other only and also requires that no draining operations to further reduce the RCS water volume are permitted.	3.4.8	3.4.1.3
3.4.8 M.3	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.8.3 requires verification that correct breaker alignment and indicated power are available to the required RHR pump not in operation. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps which are not in operation.	SR 3.4.8.3	4.4.1.3.2
3.4.9 M.1	ITS SR 3.4.9.2 requires verification that the capacity of the required groups of pressurizer heaters is $\geq 125$ kW every 18 months. This requirement does not exist in the CTS.	SR 3.4.9.2	None

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Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 M.1	CTS 3.4.3.1, Action, states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in hot shutdown within 12 hours. ITS 3.4.10 states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in MODE 3 within 6 hours and in MODE 4 with any RCS cold leg temperature $\leq 235$ °F (Unit 1), 270°F (Unit 2) within 12 hours. This changes the CTS by requiring the unit to be in MODE 3 in 6 hours. Other changes are discussed in DOC M.2.	3.4.10	3.4.3.1
3.4.10 M.2	CTS 3.4.3.1, Action, states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in hot shutdown within 12 hours. ITS 3.4.10 states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in MODE 3 within 6 hours and in MODE 4 with any RCS cold leg temperature $\leq 235$ °F (Unit 1), 270°F (Unit 2) within 12-24 hours. This changes the CTS by requiring the unit to be in MODE 4 with any RCS cold leg temperature $\leq 235$ °F (Unit 1), 270°F (Unit 2) in 12-24 hours instead of being required to be in MODE 4. Other changes are discussed in DOC M.1.	3.4.10	3.4.3.1
3.4.10 M.3	CTS 3.4.2 requires one pressurizer code safety valve to be OPERABLE in MODE 4. ITS 3.4.10 requires three pressurizer code safety valves to be OPERABLE in MODE 4 when all RCS cold leg temperatures $> 235$ °F (Unit 1), 270°F (Unit 2). This changes the CTS by requiring three safety valves to be OPERABLE in MODE 4.	3.4.10	3.4.2
3.4.11 M.1	CTS 4.4.3.2.1.b.2 requires operating the solenoid air control valves and check valves on the associated accumulators in the PORV control systems through one complete cycle of full travel every 18 months. ITS SR 3.4.11.4 requires performing a complete cycle of each solenoid control valve and check valve for the accumulators in the PORV control systems every 18 months. This changes the CTS by specifying that each solenoid control valve and check valve in the normal air and backup nitrogen PORV control systems must be tested every 18 months.	SR 3.4.11.4	4.4.3.2.1.b.2
3.4.11 M.2	CTS 3.4.3.2, Actions A.6 and B.3, state, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.4.11 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.4.3.2 Actions A.6 and B.3
3.4.12 M.1	CTS 3.4.9.3, Action f, states that the provisions of Specification 3.0.4 are not applicable. ITS 3.4.12 does not contain an equivalent Action, but SR 3.4.12.7 states that a COT must be performed on each required PORV, excluding actuation, and the SR is modified by a Note that states that the test is not required to be met until 12 hours after decreasing RCS cold leg temperature to $\leq 235$ °F (Unit 1), 270°F (Unit 2).	SR 3.4.12.7 Note	3.4.9.3 Action f

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Table M – More Restrictive Changes  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.18 M.3	CTS LCO 3.4.1.5 and LCO 3.4.1.6 require closed loop isolation valves to have A.C. power removed. There is not a CTS Action for the condition of A.C. power not removed from a closed isolation valve, but CTS 3.4.1.5, Action, allows two hours to remove power from an isolation valve and lock open the breaker. As CTS LCO 3.0.3 is not applicable in MODES 5 and 6, failure to remove power from the operator of a closed isolation valve would result in no required actions. ITS 3.4.18, Action F, applies in the condition of power not removed from the operator of a closed isolation valve when the conditions of LCO 3.4.18.a.1 or LCO 3.4.18.b.1 are not met and requires power to be removed within 30 minutes. This changes the CTS by applying a time limit on action to remove power from a valve operator. The change to the CTS 3.4.1.5 Action is discussed in DOC M.4.	3.4.18 Action F	None
3.4.18 M.4	CTS 3.4.1.5 Action states that if the requirements on opening a cold leg stop valve on an undrained loop are not met, the startup of the isolated loop is to be suspended. The Action also requires that A.C. power be removed from the loop stop valves and the breakers be locked open within 2 hours. ITS 3.4.18, Action B applies in the same circumstance and requires that the cold leg isolation valve be closed. ITS 3.4.18, Action F, states that if power is not removed from a closed isolation valve when the conditions of LCO 3.4.18.a.1 or 3.4.18.b.1 are not met, power must be removed within 30 minutes. This changes the CTS by reducing the time available to remove A.C. power from the valve operator from 2 hours to 30 minutes. Other changes are discussed in DOCS L.3 and A.4.	3.4.18 Actions B and F	3.4.1.5
3.4.18 M.5	CTS 3.4.1.5.a requires the isolated loop to have been operating on recirculation flow greater than or equal to 125 gpm for at least 90 minutes before opening the cold leg isolation valve. ITS 3.4.18.a.2 contains the same recirculation requirement. ITS SR 3.4.18.3 requires verification that the recirculation requirements is met within 30 minutes prior to opening the cold leg isolation valve.	SR 3.4.18.3	3.4.1.5.a
3.4.19 M.1 None	CTS surveillance requirement 4.10.4.2 does not require that the P-10 (Power Range Neutron Flux) and P-13 (Turbine Impulse Chamber Pressure) interlocks be tested. ITS SR 3.4.19.2 requires that these interlocks be subjected to a COT prior to initiating startup and PHYSICS TESTS. This changes the CTS by adding additional surveillance requirements. N/A	N/A SR 3.4.19.2	N/A 4.10.4.2
3.4.19 M.2	CTS surveillance requirement 4.10.4.2 currently requires that the P-7 interlock be subjected to a CHANNEL FUNCTIONAL TEST prior to initiating startup or PHYSICS TESTS. ITS SR 3.4.19.3 requires that the Low Power Reactor Trips Block, P-7 interlock, be subjected to an ACTUATION LOGIC TEST prior to initiating startup or PHYSICS TESTS. This changes the CTS by adding an additional surveillance requirement.	3.4.19.3	4.10.4.2

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Table R – Relocated Specifications and Removed Details  
ITS Section 3.4 – Reactor Coolant System (RCS)

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.3 LA.2	3.4.9.1	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS; determine that the RCS remains acceptable for continued operations or be in at least hot standby within the next 6 hours and reduce the RCS T <sub>avg</sub> and pressure to less than 200°F and 500 psig, respectively, within the following 30 hours. ITS 3.4.3, Conditions A and C state that with the requirements of the LCO not met, restore the parameter(s) to within limit(s) and determine the RCS is acceptable for continued operation. This changes the CTS by moving the requirement to perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.4 LA.1	4.4.1.1	CTS Surveillance 4.4.1.1 states that the required reactor coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.4.1 states that each reactor coolant loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance requirement to verify that the reactor coolant loops are circulating reactor coolant to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.5 LA.1	3.4.1.2.a	CTS 3.4.1.2 states that two reactor coolant loops shall be OPERABLE and contains a description of what constitutes an OPERABLE loop. ITS 3.4.5 requires two RCS loops to be OPERABLE. This changes the CTS by moving the details of what constitutes an OPERABLE loop to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

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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 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.5.1 A.2	<p>CTS LCO 3.5.1 states each reactor coolant system accumulator shall be OPERABLE and states accumulator requirements that must be met for each accumulator to be OPERABLE. ITS LCO 3.5.1 states three accumulators shall be OPERABLE. This changes CTS by moving the specific accumulator requirements to Surveillances.</p> <p>This change is acceptable because ITS SR 3.0.1 states that failure to meet a Surveillance is failure to meet the LCO. The movement of this information from the LCO to the Surveillances results in no change to the OPERABILITY requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.5.1	3.5.1
3.5.1 A.3	<p>CTS 3.5.1 does not contain a specific ACTION for two or more accumulators inoperable. With two or more accumulators inoperable, CTS 3.0.3 would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two or more accumulators are inoperable.</p> <p>This change is acceptable because the actions taken when two or more accumulators are inoperable are unchanged. Adding this ACTION is consistent with the ITS convention of directing entry into LCO 3.0.3 when a condition represents a loss of safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.5.1 Action D	3.0.3
3.5.1 A.4	<p>CTS Surveillance 4.5.1.b requires the accumulator boron concentration to be verified after each solution volume increase of <math>\geq 5\%</math> of accumulator tank volume. ITS SR 3.5.1.4 Frequency includes a Note clarifying that this boron concentration verification need only be performed on the affected accumulator.</p> <p>This change is acceptable because it is consistent with the current use and understanding of the Surveillance. Testing is unnecessary on accumulators not affected by a solution volume increase. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.5.1.4 Note	4.5.1.b

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.5	<p>CTS 3.5.1 Applicability is modified by a Note restricting the MODE 3 applicability to when pressurizer pressure above 1000 psig. ITS 3.5.1 Applicability restricts MODE 3 applicability to when RCS pressure is above 1000 psig.</p> <p>This change is acceptable because the difference between pressurizer pressure and RCS pressure is not significant, though pressurizer pressure and RCS pressure do differ somewhat due to the elevation head of the pressurizer. Specifying RCS pressure instead of pressurizer pressure provides consistency with the instrumentation actually used to meet the LCO. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.5.1	3.5.1 Note

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.6	<p>CTS 3.5.1, Action a states that if an inoperable accumulator is not restored to OPERABLE status within one hour, the unit must be placed in HOT SHUTDOWN within the next 12 hours. CTS 3.5.1, Action b states that with one accumulator inoperable due to the isolation valve being closed, if the valve is not immediately opened, the unit be in HOT STANDBY within one hour, and HOT SHUTDOWN within the next 12 hours. CTS 3.0.1 states that the LCO and Action requirements are applicable during the Operational MODEs or other conditions specified for each Specification. RCS pressure is not part of the definition of HOT STANDBY or HOT SHUTDOWN in the CTS or MODE 3 or MODE 4 in the ITS. The Applicability of CTS 3.5.1 is MODES 1, 2, and MODE 3 with pressurizer pressure &gt; 1000 psig, so the LCO and Actions become not applicable in MODE 3 with pressurizer pressure ≤ 1000 psig, and entry into HOT SHUTDOWN (MODE 4) is not required.</p> <p>ITS 3.5.1, ACTION B.1 requires that with one accumulator inoperable for reasons other than boron concentration not within limits, that the accumulator be restored to OPERABLE status within one hour. If the accumulator is not restored to OPERABLE status within one hour, ITS 3.5.1 Action C.1 requires entry into MODE 3 within 6 hours, and Action C.2 requires RCS pressure be ≤ 1000 psig within 12 hours. This changes the CTS by replacing the requirement to be in HOT SHUTDOWN within 13 hours of the inoperability with a requirement to reduce RCS pressure to ≤ 1000 psig while in MODE 3 within 13 hours. Reducing pressurizer pressure to ≤ 1000 psig while in MODE 3 in the CTS would remove the unit from the MODE of Applicability, and placing the unit in MODE 4 would not be required, making the Required Actions of the CTS and ITS the same, though described differently. The addition of the 6 hour time limit to be in MODE 3 is described in Discussion of Change M.1.</p> <p>This change is acceptable because the time to reduce RCS pressure to ≤ 1000 psig while in MODE 3 is still 13 hours from the time of the inoperability. This change clarifies an existing requirement. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.5.1	3.5.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.7	<p>CTS 4.5.1.1.b requires each accumulator be demonstrated OPERABLE, “At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 5% of tank volume by verifying the boron concentration of the accumulator solution.” ITS SR 3.5.1.4 requires verifying boron concentration every 31 days and once within 6 hours after each solution volume increase of <math>\geq 50\%</math> of indicated level that is not the result of addition from the refueling water storage tank. This changes CTS by changing the parameter value of solution volume increase of greater than or equal to 5% of tank volume to solution volume increase of <math>\geq 50\%</math> of indicated level. Changes associated with adding the criteria that the verification is not required when the volume increase is the result of addition from the refueling water storage tank is addressed by DOC L.4.</p> <p>This change is acceptable because a solution volume increase of <math>\geq 5\%</math> of tank volume correlates to a solution volume increase of <math>\geq 50\%</math> of indicated level. This change is consistent with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS). This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.5.1.4	4.5.1.1.b
3.5.2 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.5.3 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.3 A.2	<p>CTS Surveillance 4.5.3.1 states that the ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2. ITS SR 3.5.3.1 states the specific Surveillances in Specification 3.5.2 which must be performed.</p> <p>This change is acceptable because the change is editorial. The Surveillances listed in ITS SR 3.5.3.1 are those that are considered “applicable” under the CTS. All Specification 3.5.2 Surveillances are included in SR 3.5.3.1 except those that are not applicable in MODE 4. SR 3.5.2.2 verifies that ECCS valves are in their proper position to respond to an accident. It is excluded because valves are allowed to be positioned manually to align the flow paths due to reduced RCS pressure. This reduced pressure allows more time for the ECCS to deliver water to the core in the event of an accident in MODE 4. SR 3.5.2.5 and 3.5.2.6 verify actuation of components on an actuation signal. They are excluded because the ECCS actuation system is not required to be OPERABLE in MODE 4. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.5.3.1	4.5.3.1
3.5.4 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.5.4 A.2	<p>CTS LCO 3.5.5 contains a list of requirements that must be met for the Refueling Water Storage Tank (RWST) to be OPERABLE. ITS LCO 3.5.4 still requires the RWST to be OPERABLE, but the requirements for OPERABILITY are moved to the Surveillances.</p> <p>This change is acceptable because, in accordance with SR 3.0.1, failure to meet a Surveillance is failure to meet the LCO. Therefore, the movement of the requirements from the LCO to the Surveillances results in no changes to the OPERABILITY requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 4.5.5	3.5.5
3.5.5 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.5 A.2	<p>CTS 3.4.6.2 Action b states that with any RCS leakage greater than the controlled leakage rate, reduce the leakage rate to within limits within 4 hours. ITS 3.5.5 Action A states with seal injection flow not within limit, adjust manual seal injection throttle valves to give a flow within limit with RCS pressure <math>\geq 2215</math> psig and <math>\leq 2255</math> psig and the seal injection modulating valve full open within 4 hours. This changes CTS by providing more detail for the Action.</p> <p>ITS 3.5.5 Action A provides detail of how CTS 3.4.6.2 Action B is carried out. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.5.5 Action A	3.4.6.2 Action b
3.5.6 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.5.6 A.2	<p>CTS LCO 3.5.4.1 contains a list of requirements that must be met for the Boron Injection Tank (BIT) to be OPERABLE. ITS LCO 3.5.6 requires the BIT to be OPERABLE, but the requirements for OPERABILITY are moved to Surveillances.</p> <p>This change is acceptable because, in accordance with SR 3.0.1, failure to meet a Surveillance is failure to meet the LCO. Therefore, the movement of these requirements from the LCO to the Surveillances results in no changes to the OPERABILITY requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SRs 3.5.6.1, 3.5.6.2 and 3.5.6.3	3.5.4.1 and 4.5.4.1

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.6.1 A.2	<p>CTS 4.6.1.1.b states, "Primary CONTAINMENT INTEGRITY shall be demonstrated...By verifying that each containment air lock is OPERABLE per Specification 3.6.1.3." ITS does not include the reference to CTS 3.6.1.3, which is changed to ITS 3.6.2. This changes the CTS by not including a reference to another LCO that is required in the same Modes of Applicability regardless of the reference. The purpose of the CTS 4.6.1.1.b is to provide assurance that each containment air lock is performing its function in support of CONTAINMENT INTEGRITY.</p> <p>This change is acceptable because ITS 3.6.2 provides assurance that containment air locks are OPERABLE without the reference in 3.6.1. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	4.6.1.1.b
3.6.1 A.3	<p>CTS LCO 3.6.1.2, 3.6.1.2 Action, and Surveillance Requirement 4.6.1.6.1 reference specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. CTS 4.6.1.2 also states, "The provisions of Specification 4.0.2 are not applicable." ITS LCO 3.6.1 requires that containment be Operable, Action A.1 requires the containment be restored to Operable status, and Surveillance Requirement 3.6.1.1 requires performance of visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program. ITS 5.5.16 states, "The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program." This changes CTS by referencing the appropriate 10 CFR 50, Appendix J, Option B requirements, stating that SR 3.0.2 (vice CTS 4.0.2) is not applicable, and placing other specific leakage rate criteria in the Containment Leakage Rate Testing Program requirements in ITS 5.5.16.</p> <p>The purpose of ITS 3.6.1 is to ensure that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. This change is acceptable because the appropriate 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria are retained in the Technical Specifications as part of ITS 5.5.16, the Containment Leakage Rate Testing Program. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.6.1, Action A.1, SR 3.6.1.1, 5.5.16	LCO 3.6.1.2, 3.6.1.2 Action, Surveillance 4.6.1.6.1, 4.6.1.2

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 A.4	<p>CTS 3.6.1.1 states, "Primary CONTAINMENT INTEGRITY shall be maintained." CTS 3.6.1.2 requires containment leakage rates be within specified parameters. CTS 3.6.1.6 requires that the structural integrity of the containment be maintained within specified parameters. CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when..." ITS 3.6.1 states, "Containment shall be OPERABLE." This changes the CTS by combining the containment requirements of CTS 3.6.1.1, CTS 3.6.1.2, and CTS 3.6.1.6 into one LCO. The purpose of CTS 3.6.1.1, CTS 3.6.1.2, and CTS 3.6.1.6 is to provide requirements pertaining for containment OPERABILITY.</p> <p>This change is acceptable because moving these requirements to one LCO, ITS 3.6.1, centralizes the requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.1	3.6.1.1, 3.6.1.2, 3.6.1.6
3.6.1 A.5	<p>CTS 3.6.1.2 Action does not state what action to take if specific leakage rate limits are not met while in the MODES of Applicability, and includes a requirement that the limits be met prior to entering the MODES of Applicability. Entry into CTS 3.0.3 is required if CTS 3.6.1.2 is not met while in the MODES of applicability. CTS 3.0.3 allows 1 hour to prepare and requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. ITS 3.6.1 REQUIRED ACTION A.1 requires that if the containment is inoperable, it must be restored to OPERABLE status within 1 hour. ITS 3.6.1 Required Action A.1 requires that if the Required Action and associated Completion Time are not met, the unit be in MODE 3 within 6 hours, and MODE 5 within 36 hours. This changes CTS by stating the Required Actions rather than deferring to CTS 3.0.3.</p> <p>The purpose of CTS 3.0.3 is to place the unit outside the MODE of Applicability within a reasonable amount of time in a controlled manner. CTS 3.6.1.2 is silent on these actions, deferring to CTS 3.0.3 for the actions to accomplish this. This change is acceptable because the Required Actions specified in ITS 3.6.1 adopt standard ITS structure for placing the unit outside the MODE of Applicability without changing the time specified to enter MODE 3 and MODE 5. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.1, Required Action A.1	None
3.6.2 A.1	<p>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).</p> <p>These changes are designated as administrative changes because they do not result in technical changes to the CTS.</p>	Various	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.2	<p>CTS 3.6.1.3 Action a.1 includes an Action requirement that states, "...and either restore the inoperable air lock to OPERABLE status..." ITS 3.6.2 Condition A does not include such an Action Requirement. This changes CTS by not explicitly stating that correcting the cause of Condition entry allows the Condition to be exited.</p> <p>The purpose of the statement in CTS 3.6.1.3 Action a.1 is to make it clear that one option for exiting a Condition is to meet the LCO. This change is acceptable because the concept is stated in ITS 3.0.2. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.6.1.3, Action a.1
3.6.2 A.3	<p>CTS 3.6.1.3.a.4 states, "The provisions of Specification 3.0.4 are not applicable." 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 provision contained in the ACTION statements unless otherwise excepted." ITS 3.6.2 does not contain the exception to ITS 3.0.4. ITS 3.0.4 states that when an LCO is not met, entry into a MODE or other specified condition in the Applicability may be made 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. <del>ITS 3.0.4 states, "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."</del> This changes CTS by deleting a reference to a requirement which is changed in ITS in such a way that the reference is no longer required. The purpose of CTS 3.6.1.3.a.4 is to provide an exception to the CTS 3.0.4.</p> <p>This change is considered acceptable because ITS 3.0.4 is structured such that these exceptions are not required. ITS 3.6.2 Actions allow continued operation for an unlimited period of time, which together with ITS 3.0.4 result in the same technical requirements as the CTS Actions. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.6.1.3.a.4
3.6.2 A.4	<p>CTS 3.6.1.3 Action a.2 includes an Action requirement that states, "Operation may then continue until performance of the next required overall air lock leakage test provided that..." but does not include a requirement to perform such a test in response to entering the Condition. ITS 3.6.2 does not include such a statement. This changes CTS by deleting an exclusion for an Action that is not required.</p> <p>This change is acceptable because operating until performance of the next required overall air lock leakage test is allowed without the deleted reference, if the specified Actions are taken. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.6.1.3, Action a.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.5	<p>CTS 3.6.1.3 states, “Each containment air lock shall be OPERABLE...” CTS 3.6.1.3 Action a states, “With one containment air lock door inoperable:” and specifies Actions to be taken. CTS 3.6.1.3 Action b states, “With a containment air lock inoperable, except as a result of an inoperable air lock door,” and specifies Actions to be taken. ITS Actions NOTE 2 states, “Separate Condition entry is allowed for each air lock.” ITS Condition A states, “One or more containment air locks with one containment air lock door inoperable,” and ITS Condition C states, “One or more containment air locks inoperable for reasons other than Condition A or B.” This changes CTS by clarifying the current intent of applying the Actions to each air lock separately.</p> <p>The purpose of CTS 3.6.1.3 is to ensure containment air locks meet their requirements for containment OPERABILITY. One OPERABLE air lock door in each containment air lock provides a pressure boundary, and applying the Actions for one inoperable air lock door to each of the air locks separately is appropriate. ITS 3.6.2 Actions NOTE 2 clearly states this. The Required Actions for each Condition provide appropriate compensatory action for each inoperable air lock. This change is acceptable because it clarifies existing requirements and better describes how the requirements are currently used. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.2 Action Note 2, Condition A and Condition B	3.6.1.3, Actions a and b
3.6.2 A.6	<p>CTS 3.6.1.3 does not include a reference to entering applicable Conditions and Required Actions of the Containment OPERABILITY LCO (CTS 3.6.1.1). ITS 3.6.2 Actions NOTE 3 states, “Enter applicable Conditions and Required Actions of LCO 3.6.1, “Containment,” when air lock leakage results in exceeding the overall containment leakage rate.” This changes CTS by explicitly requiring the Containment Conditions be entered when the Containment LCO is not met as a result of air lock leakage exceeding limits.</p> <p>This change is acceptable because it reinforces the requirement in ITS 3.6.1 to meet overall containment leakage limits. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.2, Actions Note 3	3.6.1.3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.7	<p>CTS 3.6.1.3 Action a addresses one inoperable containment air lock door, and CTS Action b addresses an inoperable containment air lock for reasons other than an inoperable air lock door, which includes both air lock doors in one air lock being inoperable. Either Action a or b would be taken. ITS 3.6.2 NOTE 1 of Required Action A directs entry into Condition C when both doors in the same air lock are inoperable. This changes CTS by adding a NOTE to clarify that entry into Condition C is required when both doors in the same air lock are inoperable, consistent with the CTS requirement.</p> <p>This change is acceptable because the CTS requirement to enter one Action for one inoperable door in an air lock, and another Action for two inoperable doors in an air lock, is retained in ITS using ITS usage rules. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.2, Required Action A, Note 1	3.6.1.3, Actions a and b
3.6.2 A.8	<p>CTS LCO 3.6.1.3 and Surveillance Requirement 4.6.1.3 reference specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS LCO 3.6.2 requires that containment air locks be Operable and Surveillance Requirement 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. This changes CTS by referencing the appropriate 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria in the Containment Leakage Rate Testing Program requirements in ITS 5.5.15.</p> <p>The purpose of CTS 3.6.2 is to ensure that the structural integrity of the containment air locks will be maintained comparable to the original design standards for the life of the facility. This change is acceptable because the appropriate 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria are retained in the Technical Specifications as part of ITS 5.5.15, the Containment Leakage Rate Testing Program. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.6.2, SR 3.6.2.1, 5.5.15	3.6.1.3, 4.6.1.3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.9	<p>CTS 4.6.1.3 references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 1 states, "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This changes CTS by Adding Note 1 as a reminder that either air lock door is capable of providing a fission product barrier in the event of a DBA. ITS Changes associated with how the leakage rate criteria are addressed are addressed by DOC A.8.</p> <p>The purpose of CTS 3.6.2 is to ensure that the structural integrity of the containment air locks will be maintained comparable to the original design standards for the life of the facility. This change is acceptable because it provides additional assurance that the containment air lock remains considered OPERABLE with one inoperable air lock door, consistent with current requirements and practices. One inoperable door does not invalidate the test for the overall air lock leakage test because the second door is still capable of performing the safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.6.2.1, Note 1	4.6.1.3
3.6.2 A.10	<p>CTS 4.6.1.3 references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing, in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 2 states, "Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1." This changes CTS by adding Note 2 as a reminder that the air lock leakage must be accounted for in determining the combined Type B and C containment leakage rate. ITS Changes associated with how the leakage rate criteria are addressed are addressed by DOC A.8.</p> <p>The purpose of CTS 3.6.1.3 is to ensure that the structural integrity of the containment air locks will be maintained comparable to the original design standards for the life of the facility. This change is acceptable because it provides additional assurance that the containment air lock leakage is properly accounted for in determining the combined Type B and C containment leakage rate, consistent with current requirements and practices. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.6.2.1, Note 2	4.6.1.3
3.6.3 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.2	<p>CTS 3.6.3.1 and CTS 3.6.5.1 do not specifically require Conditions be entered for systems supported by containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.3 Action Note 3 states, “Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves.” ITS 3.0.6 provides an exception to LCO 3.0.2, stating, “When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered.” LCO 3.0.6 goes on to describe how the Safety Function Determination Program is used to evaluate support-supported system relationships. This changes CTS by requiring a specific statement to require supported system Conditions and Required Actions be entered, whereas in CTS this would be done without the NOTE.</p> <p>This change is acceptable because the addition of the NOTE reflects the CTS requirement to take applicable Actions for inoperable systems. The NOTE is required because of the addition of LCO 3.0.6, and because the requirement to declare supported systems inoperable is being retained. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.3, Action Note 3	None
3.6.3 A.3	<p>CTS 3.6.3.1 and CTS 3.6.5.1 do not include a reference to entering applicable Conditions and Required Actions of the Containment OPERABILITY LCO (CTS 3.6.1.1). ITS 3.6.3 Action NOTE 4 states, “Enter applicable Conditions and Required Actions of LCO 3.6.1, “Containment,” when leakage for a penetration flow path results in exceeding the overall containment leakage rate.” This changes CTS by explicitly stating an existing requirement that the containment Actions be taken when the containment LCO is not met as a result of air lock leakage exceeding limits.</p> <p>This change is acceptable because it reinforces the existing CTS requirement to meet overall containment leakage limits. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.3, Action Note 4	None

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.4	<p>CTS 3.6.3.1.a requires restoring the inoperable valve(s) to OPERABLE status within 4 hours with one or more of the isolation valves inoperable, or take one of the other specified actions. ITS 3.6.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other Actions to take within 4 hours. ITS LCO 3.0.2 states, "If the LCO is met or no longer applicable prior to the expiration of the specified Completion time(s), completion of the Required Actions(s) is not required unless otherwise stated."</p> <p>This changes CTS by including the requirement as part of LCO 3.0.2, rather than explicitly stating the allowance. This change is acceptable because it retains an existing allowance in ITS format with ITS usage rules. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.0.2	3.6.3.1
3.6.3 A.5	<p>CTS 3.6.3.1 and CTS 3.6.5.1 do not include any Condition and Required Actions for one or more penetration flow paths with two containment isolation valves inoperable. CTS 3.0.3 would be entered for this Condition. ITS 3.6.3 Condition B states, "One or more penetration flow paths with two containment isolation valves inoperable." ITS Required Action B.1 states, "Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange," within 1 hour. ITS 3.6.3 Condition E requires the unit be placed in MODE 3 in 6 hours, and MODE 5 in 36 hours if the Required Action and associated Completion Time is not met. This changes CTS by stating the Actions to be taken for two containment isolation valves inoperable, rather than relying on CTS 3.0.3, which contains the same Completion Times for placing the unit outside its MODE of Applicability.</p> <p>This change is acceptable because it places CTS 3.0.3 requirements in ITS format. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.3, Conditions B and E	None

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.6	<p>CTS 3.6.3.1 Action states, “The provisions of Specification 3.0.4 do not apply.” 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 provision contained in the ACTION statements unless otherwise excepted.” ITS 3.6.2 does not contain the exception to ITS 3.0.4. <u>ITS 3.0.4 states that when an LCO is not met, entry into a MODE or other specified condition in the Applicability may be made 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.</u> <del>ITS 3.0.4 states, “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.”</del> This changes CTS by incorporating an allowance into ITS LCO 3.0.4.</p> <p>This change is considered acceptable because LCO 3.0.4 is changed in ITS such that the NOTE is not required to retain the same CTS requirement. ITS 3.6.2 Actions allow continued operation for an unlimited period of time, which together with ITS 3.0.4 result in the same technical requirements as the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	ITS LCO 3.0.4	3.6.3.1 Action
3.6.3 A.7	<p>CTS 4.6.3.1.3 requires the isolation time of each power operated or automatic containment isolation valve be determined to be within its limit when tested pursuant to Specification 4.0.5. ITS SR 3.6.3.3 requires verifying the isolation time of each automatic power operated containment isolation valve is within limits, with a Frequency in accordance with the Inservice Testing Program. This changes the CTS by stating that the Frequency is in accordance with the Inservice Testing Program. The purpose of CTS 4.6.3.1.3 is to verify the isolation time of each power operated or automatic containment isolation valve is tested in accordance with the Inservice Testing Program.</p> <p>This change is acceptable because the test requirements regarding the power operated or automatic containment isolation valves remain the same. The ITS SR 3.6.3.3 Frequency remains unchanged. The inservice testing requirements of CTS 4.0.5 have been relocated to the Inservice Testing Program contained in Section 5.5 of the ITS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.6.3.3	4.6.3.1.3

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.8	<p>CTS 3.6.3.1 Action states, “With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open...” CTS 3.6.5.1 Action states, “With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position...” ITS 3.6.3 Actions NOTE 2 states, “Separate Condition entry is allowed for each penetration flow path.” This changes CTS by stating an existing allowance in ITS format.</p> <p>The purpose of CTS 3.6.3.1 Action is to provide guidance on how to address isolation valve inoperabilities for individual penetrations. CTS 3.6.5.1 addresses a specific penetration. ITS 3.6.3 Actions NOTE 2 provides similar guidance in ITS format, using ITS usage rules. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.3 Actions Note 2	3.6.3.1 Action, 3.6.5.1 Action
3.6.3 A.9	<p>CTS 4.6.5.1.1 states, “The steam jet air ejector suction line outside isolation valve shall be determined to be in the closed position by visual observation prior to increasing the Reactor Coolant System temperature above 200°F and...” ITS SR 3.6.3.1 does not include a reference to verification prior to increasing the Reactor Coolant System temperature above 200°F. ITS SR 3.0.1 states, “SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs...” This changes CTS by not including a statement for a requirement that is already addressed in the ITS 3.0 Section.</p> <p>This change is acceptable because it incorporates a CTS requirement into the general rules for use of the ITS in the 3.0 section. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	4.6.5.1.1
3.6.3 A.10	<p>CTS 4.6.3.1.1.a requires testing of each containment isolation valve that is a weight or spring loaded check valve testable during unit operation every 92 days. The ITS does not contain this Surveillance. This changes the CTS by eliminating this Surveillance.</p> <p>This change is acceptable because the technical requirements have not changed. North Anna does not contain any containment isolation valves that are weight or spring loaded check valves which are testable during unit operation. Therefore, this surveillance is never performed. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	4.6.3.1.1.a

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.11	<p>CTS 3.6.3.1 Action states, “With one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open...” ITS Conditions A and B Notes state, “Only applicable to penetration flow paths with two containment isolation valves.” ITS Condition C Note states, “Only applicable to penetration flow paths with only one containment isolation valve and a closed system.” ITS Condition ITS 3.6.3 Required Actions A.1 and C.1 require the associated flow path be isolated by one of the means specified with one or more penetration flow paths with one containment isolation valve inoperable. ITS 3.6.3 Required Actions A.1 and C.1 both assume the other isolation valve or closed system are OPERABLE for the isolation function. If two valves in a penetration flow path with two containment isolation valves are inoperable, Required Action B.1 requires the penetration be isolated within one hour, or Condition E is entered, requiring the unit be placed in MODE 3 within 6 hours, and MODE 5 within 36 hours. In a penetration flow path with one containment isolation valve and a closed system, where the containment isolation valve and the closed system were not capable of performing the isolation function, ITS LCO 3.0.3 would be entered. This changes CTS by incorporating the concept of assuring that the second means of containment isolation for a penetration flow path is OPERABLE into the Conditions and Required Actions associated with ITS 3.6.3.</p> <p>This change is acceptable because when one means of isolating a containment flow path is inoperable, the other must be OPERABLE, or the ITS requires Required Actions be taken for two inoperable means of isolating a containment flow path, rather than allowing the Completion Times associated with one inoperable means of isolating a containment flow path. This retains the CTS 3.6.3.1 concept of maintaining at least one isolation valve OPERABLE in each affected penetration that is open when one or more isolation valves are inoperable. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.3 Condition A, B, and C Notes, Required Action A.1, B.1, C.1, and Condition E	3.6.3.1 Action
3.6.3 A.12	<p>CTS 4.6.1.1.d states, “Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line.” The Applicability is MODES 1, 2, 3, and 4. The Frequency for ITS SR 3.6.3.4 states, “Prior to entering MODE 4 from MODE 5 after containment vacuum has been broken. This changes the CTS by adopting the ISTS Frequency format for such a Surveillance Requirement, clarifying that it is required to be performed prior to entering the MODE of Applicability each time the containment vacuum has been broken.</p> <p>This change is acceptable because it clarifies the existing requirement, in ISTS format, to test the relevant valves prior to entering the MODE of Applicability each time the containment vacuum has been broken. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.6.3.4	4.6.1.1.d

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.13	<p>CTS 4.6.1.1.d states, "Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line." ITS SR 3.6.3.4 states, "Perform leakage rate testing for containment purge valves with resilient seals." This changes CTS by clarifying that the valves being tested as part of the Surveillance Requirement are those with "resilient seals." The changes moving some of the system description to the Bases is addressed by DOC LA.4.</p> <p>This change is acceptable because it clarifies that the valves addressed by the Surveillance are those with resilient seals, which are the valves described by the phrase, "...butterfly isolation valves in the containment purge lines and the containment vacuum ejector line." This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.6.3.4	4.6.1.1.d
3.6.4 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.6.5 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.6.6 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A.2	<p>CTS 4.6.2.1.a.2 states that the temperature of the borated water in the refueling water storage tank must be verified to be within the limits shown on Figure 3.6-1 every 31 days. Figure 3.6-1 states that the RWST temperature must be <math>\leq 50^{\circ}\text{F}</math>. CTS LCO 3.6.1.4 and CTS 4.6.1.4 require that the containment internal air partial pressure be in compliance with Figure 3.6-1 every 12 hours. CTS 3.5.5.c and 4.5.5.b require verification that the RWST temperature is between <math>40^{\circ}</math> and <math>50^{\circ}</math> every 7 days. ITS SR 3.5.4.1 requires verification of RWST temperature every 24 hours. This changes the CTS by eliminating the verification of RWST temperature every 7 days from the quench spray requirements.</p> <p>This change is acceptable because the technical requirements have not changed. The requirements to verify RWST temperature in CTS 3.6.1.4, CTS 3.5.5, ITS SR 3.6.4.1, and ITS SR 3.5.4.1 are performed more frequently than the requirement in CTS 4.6.2.1.a.2. Therefore, the elimination of this Surveillance has no effect on plant operation. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.5.4.1, SR 3.6.4.1	4.6.2.1.a.2
3.6.7 A.1	<p>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).</p> <p>These changes are designated as administrative changes because they do not result in technical changes to the CTS.</p>	Various	Various
3.6.7 A.2	<p>CTS 3.6.2.2 states two trains of containment recirculation spray shall be OPERABLE. ITS 3.6.7 states four Recirculation Spray (RS) subsystems shall be OPERABLE. This changes the CTS by specifying that the four subsystems that make up the two RS trains be OPERABLE. The purpose of CTS 3.6.2.2 is to have the required equipment available for two RS trains to be OPERABLE.</p> <p>This change is acceptable because a train of RS is made up of two subsystems, so requiring the four RS subsystems to be OPERABLE is equal to requiring two RS trains to be OPERABLE. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.6.7	3.6.2.2

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Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.7 A.3	<p>CTS LCO 3.6.2.2.b states the casing cooling tank solution requirements that must be met for the casing cooling tank to be OPERABLE. ITS LCO 3.6.7 requires the casing cooling tank to be OPERABLE, but the specific solution requirements are moved to the Surveillance Requirements (SRs). This changes the CTS by moving specific parameter requirements that must be met for OPERABILITY from the LCO to the SRs. The purpose of CTS 3.6.2.2.b is to have the casing cooling tank OPERABLE with the solution parameters within the required limits.</p> <p>This change is acceptable because ITS SR 3.0.1 states that failure to meet a SR is failure to meet the LCO. The movement of this information from the LCO to the SR results in no change to the OPERABILITY requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.6.7	LCO 3.6.2.2.b
3.6.7 A.4	<p>CTS 3.6.2.2 does not contain an ACTION for one inside RS subsystem and one outside RS subsystem inoperable not in the same train, or for two outside RS subsystems inoperable, or for three or more RS subsystems inoperable. In these conditions CTS 3.0.3 would be entered. ITS 3.6.7 CONDITION G includes a REQUIRED ACTION to enter ITS 3.0.3 for these conditions. CTS 3.6.2.2 implicitly requires entry into CTS 3.0.3 for one inside RS subsystem and one outside RS subsystem inoperable not in the same train, or for two outside RS subsystems inoperable, or for three or more RS subsystems inoperable, by omitting ACTIONS for these conditions.</p> <p>This change is acceptable because it provides explicit direction to enter LCO 3.0.3 instead of relying on the Section 3.0 usage rules to imply LCO 3.0.3 entry. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.6.7, Condition G	None
3.6.8 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various
3.6.8 A.2	<p>CTS LCO 3.6.2.3 contains a list of requirements that must be met for the Chemical Addition System to be OPERABLE. ITS LCO 3.6.8 still requires the Chemical Addition System to be OPERABLE, but the requirements for OPERABILITY are moved to Surveillances.</p> <p>This change is acceptable because ITS SR 3.0.1 states that failure to meet a Surveillance is failure to meet the LCO. The movement of this information from the LCO to the Surveillances results in no change to the OPERABILITY requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.6.8	3.6.2.3

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.9 A.1	<p>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).</p> <p>These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.</p>	Various	Various