

ATTACHMENT 2

Table A - Administrative Changes

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 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>	None	Various
1.0 A.2	<p>ITS Section 1.1 provides definitions of ACTUATION LOGIC TEST, MASTER RELAY TEST, and TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT). These terms are used as defined terms in the ITS but do not appear in the CTS.</p> <p>This change is acceptable because these changes do not impose any new requirements or alter existing requirements. Any technical changes due to the addition of these terms and definitions will be addressed in the Discussion of Changes (DOCs) for the sections of the Technical Specifications in which the terms are used. These changes are designated as administrative as they add defined terms which involve no technical change to the Technical Specifications.</p>	1.1 definitions of ACTUATION LOGIC TEST, MASTER RELAY TEST, AND TADOT	None
1.0 A.3	<p>CTS Section 1.0 provides a definition of SHUTDOWN MARGIN (SDM). The ITS Section 1.1 definition of SDM contains three differences from the CTS definition.</p> <ul style="list-style-type: none"> <li>The CTS definition is changed to state the highest reactivity worth RCCA does not have to be assumed if the RCCAs can be verified fully inserted by two independent means. This change is described in DOC L.5.</li> <li>The CTS definition is changed to indicate that the worth of any Rod Control Cluster Assemblies (RCCAs) which are not capable of being fully inserted must be accounted for in the determination of the SDM.</li> </ul> <p>This change is acceptable because it is consistent with the existing SDM requirements in CTS 3.1.1.1 and 3.1.1.2.</p> <ul style="list-style-type: none"> <li>The CTS definition is clarified to include a description of the reactor conditions, i.e. nominal zero power level, at which the SDM is calculated.</li> </ul> <p>This change is acceptable because including this information is not a technical change. SDM calculations are currently performed for nominal zero power conditions.</p> <p>These changes are designated as administrative because they do not represent a technical change to the Technical Specifications.</p>	1.1 definition of SDM	1.0 definition of SDM

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.4	<p>The CTS Section 1.0 definition of CHANNEL FUNCTIONAL TEST includes the requirements for performing a CHANNEL FUNCTIONAL TEST on bistable channels. ITS Section 1.1 moves these requirements to a new defined term, TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT).</p> <p>This change is acceptable because the movement of this information does not impose any new requirements or alter existing requirements. Any technical changes associated with the movement of this information will be addressed in other DOCs. This change is categorized as administrative because it is the movement of information within the Technical Specifications.</p>	1.1 definition of TADOT	1.0 definition of CHANNEL FUNCTIONAL TEST
1.0 A.5	<p>CTS Section 1.0 provides a definition of CORE ALTERATION. The ITS Section 1.1 definition of CORE ALTERATION revises the CTS definition to eliminate two redundant phrases.</p> <ul style="list-style-type: none"> <li>• The CTS definition includes, “movement or manipulation” of any component within the reactor vessel. The ITS definition of CORE ALTERATION will only include “movement” of components, not “manipulation.”</li> </ul> <p>This change is acceptable because the eliminated phrase adds no value. In the context of this definition, any manipulation of a component will involve its movement, so stating “movement or manipulation” is redundant and potentially confusing.</p> <ul style="list-style-type: none"> <li>• The CTS definition does not preclude completion of movement of a component to a “safe conservative” position. The ITS definition specifies only a “safe” position.</li> </ul> <p>This change is acceptable because the eliminated phrase adds no value. The Technical Specifications provide no basis for determining whether a movement is conservative, so it is assumed that the word “conservative” is used in the definition to mean “safe.” Therefore, stating “safe conservative” is repetitious and potentially confusing.</p> <p>These changes are designated administrative because they represent the elimination of redundant words and phrases without changing the intent of the definition.</p>	1.1 definition of CORE ALTERATION	1.0 definition of CORE ALTERATION

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

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.11	<p>CTS Section 1.0 defines CHANNEL FUNCTIONAL TEST as “the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions.” ITS Section 1.1 renames the CTS definition to CHANNEL OPERATIONAL TEST (COT) and defines it as, “the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy. The COT may be performed by means of any series of sequential, overlapping or total channel steps.” The addition of use of an actual signal is discussed in DOC L.1. This changes the CTS by stating that the COT shall include adjustments, as necessary, of the devices in the channel so that the setpoints are within the required range and accuracy, changes the example list of devices contained in the definition, and states that the test may be performed by means of any series of sequential, overlapping, or total channel steps.</p> <p>This change is acceptable because the ITS definition is consistent with current plant practices and the results of the test are unaffected by the change.</p> <ul style="list-style-type: none"> <li>• The CTS definition states that the CHANNEL FUNCTIONAL TEST shall verify that the channel is operable “including alarm and/or trip initiating action.” The ITS states that the COT shall verify OPERABILITY of “all devices in the channel required for channel OPERABILITY.” This change is acceptable because the statements are equivalent in that both require that the channel be verified to be OPERABLE. The CTS and the ITS use different examples of what is included in a channel, but this does not change the intent of the requirement. The ITS use of the phrase “all devices in the channel required for channel OPERABILITY” reflects the CTS understanding that the test only includes those portions of the channel needed to perform the safety function.</li> <li>• The ITS states, “The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy.” This change is acceptable because it clarifies that adjustments performed during a COT do not invalidate the test. This is consistent with the current implementation of the CHANNEL FUNCTIONAL TEST and does not result in a technical change to the specifications.</li> <li>• The ITS states, “The COT may be performed by means of any series of sequential, overlapping, and total channel steps.” This change is acceptable because it states current Industry practice. This is consistent with the current implementation of the CHANNEL FUNCTIONAL TEST and does not result in a technical change to the specifications.</li> </ul> <p>This change is designated as administrative because it does not result in a technical change to the specifications.</p>	1.1 definition of CHANNEL OPERATIONAL TEST	1.0 definition of CHANNEL FUNCTIONAL TEST

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.14	<p>CTS Section 1.0 and Table 1.1, "OPERATIONAL MODES," provide a description of the MODES. ITS Section 1.1 and Table, 1.1-1, "MODES," changes the CTS MODE definitions in several ways:</p> <ul style="list-style-type: none"> <li>• The phrase "the vessel head closure bolts" is replaced with "one or more vessel head closure bolts" in Note **. This change is acceptable because the revised phrase is consistent with the current interpretation and usage. MODE 6 is currently declared when the first vessel head closure bolt is detensioned.</li> <li>• The Note ** condition, "fuel in the reactor vessel" is moved from Table 1.1 to the MODE definition. This change is acceptable because it moves information within the Technical Specifications with no change in intent.</li> <li>• The phrase "or with the head removed" is eliminated from Note **. This change is acceptable because it eliminates a redundant phrase. The reactor vessel head cannot be removed unless the reactor vessel head closure bolts are detensioned. Since "One or more reactor vessel head closure bolts less than fully tensioned" is already specified in the Note, including "or with the head removed" is unnecessary.</li> <li>• ITS Table 1.1-1 contains a new Note, labeled "(b)", which applies to MODES 4 and 5. Note (b) states, "All reactor vessel head closure bolts fully tensioned." This Note is the opposite of CTS Note ** and ITS Note (c). This change is acceptable because it avoids a conflict between the definition of MODE 6 and the other MODES should RCS temperature increase above the CTS MODE 6 temperature limit when a reactor vessel head closure bolt is less than fully tensioned. This ITS Note is included only for clarity. It is consistent with the current use of MODES 4 and 5 and does not result in any technical change to the application of the MODES.</li> <li>• For consistency with the Notes in ITS Table 1.1-1, the ITS definition of MODE incorporates "reactor vessel head closure bolt tensioning" to the list of characteristics that define a MODE. This change is acceptable because the definition of MODE should be consistent with the MODE table in order to avoid confusion. This change is made only for consistency and results in no technical changes to the Technical Specifications.</li> </ul> <p>These changes are designated as administrative because they clarify the application of the MODES and no technical changes to the MODE definitions are made. The clarifications are consistent with the current use and application of the MODES.</p>	1.1 definition of MODE and Table 1.1-1	1.0 definition of OPERATIONAL MODES and Table 1.1

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

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

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ITS Section 1.0 – Use and Application

DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.17	<p>CTS Table 1.1, OPERATIONAL MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are:</p> <ul style="list-style-type: none"> <li>• The minimum average reactor coolant temperature for MODES 1 and 2 provided in CTS Table 1.1 is changed to NA (not applicable) in ITS Table 1.1-1.</li> </ul> <p>This change is acceptable because ITS LCO 3.4.2, RCS Minimum Temperature for Criticality, provides the minimum reactor coolant temperature limits for MODES 1 and 2. Therefore, the 350°F minimum temperature does not provide any useful information in Table 1.1-1, and is deleted from the ITS.</p> <ul style="list-style-type: none"> <li>• The CTS Table 1.1 MODE 6 upper limit on average reactor coolant temperature is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is given as "NA" (not applicable).</li> </ul> <p>This change is acceptable because it eliminates a conflict in the CTS MODE table. If the average coolant temperature exceeds the upper limit with the reactor vessel head closure bolts less than fully tensioned, the CTS Table could be misinterpreted as no MODE being applicable. This is not the intent of the CTS or ITS MODE 6 definitions. By removing the temperature reference, this ambiguity is eliminated.</p> <ul style="list-style-type: none"> <li>• The CTS Table 1.1 RATED THERMAL POWER limits of 0% for MODES 3, 4, 5, and 6 are changed in ITS Table 1.1-1 to "NA" (not applicable).</li> </ul> <p>This change is acceptable because the reactivity and plant equipment limitations in MODES 3, 4, 5 and 6 do not allow power operation. Therefore, it is not necessary to have these restrictions in the MODE table.</p> <p>These changes are designated as administrative because they result in no technical changes to the Technical Specifications</p>	Table 1.1-1	Table 1.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.18	<p>CTS Section 1.0 defines a SLAVE RELAY TEST as “the energization of each slave relay and verification of OPERABILITY of each relay. The SLAVE RELAY TEST shall include a continuity check, as a minimum, of associated testable actuation devices.” ITS Section 1.1 defines the SLAVE RELAY TEST as, “the energization of all slave relays in the channel required for channel OPERABILITY and verification of OPERABILITY of each required slave relay. The SLAVE RELAY TEST shall include a continuity check of associated testable actuation devices. The SLAVE RELAY TEST may be performed by means of any series of sequential, overlapping, or total channel steps.” This changes the CTS by stating that the SLAVE RELAY TEST shall include the slave relays required for channel OPERABILITY and by stating that the test may be performed by means of any series of sequential, overlapping, or total channel steps.</p> <p>This change is acceptable because the ITS definition is consistent with current plant practices and the results of the test are unaffected by the change.</p> <ul style="list-style-type: none"> <li>• The CTS definition states that the SLAVE RELAY TEST shall energize “each slave relay.” The ITS states that the SLAVE RELAY TEST shall include the energization of “all slave relays in the channel required for channel OPERABILITY.” This change is acceptable because the statements are equivalent in that both require that the channel be verified to be OPERABLE. The ITS use of the phrase “all slave relays in the channel required for channel OPERABILITY” reflects the CTS understanding that the test only includes those portions of the channel needed to perform the safety function.</li> <li>• The ITS states, “The SLAVE RELAY TEST may be performed by means of any series of sequential, overlapping, and total channel steps.” This change is acceptable because it states current Industry practice. This is consistent with the current implementation of the SLAVE RELAY TEST and does not result in a technical change to the specifications.</li> </ul> <p>This change is designated as administrative because it does not result in a technical change to the specifications.</p>	1.1 definition of SLAVE RELAY TEST	1.0 definition of SLAVE RELAY TEST

Table A – Administrative Changes  
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 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>	None	Various
2.0 A.2	<p>CTS 2.1.1 references three curves providing limits on THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature (Tavg). One curve applies to three loop operation (Figure 2.1-1) and two apply to two-loop operation (Figures 2.1-2 and 2.1-3). In the CTS, Figures 2.1-2 and 2.1-3 are replaced with a note stating, "This page left blank pending NRC approval of ECCS evaluation of two loops in operation with the third loop isolated" and "This page left blank pending NRC approval of ECCS evaluation of two loops in operation with the third loop not isolated," respectively. ITS 2.1.1 does not contain an allowance to operate with less than three reactor coolant loops in operation. This changes the CTS by eliminating references and place holders for curves applying to two-loop operation.</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 (MODES 1 and 2). This change is designated as administrative because it eliminates an option in the CTS which cannot be used.</p>	None	2.1.1, Figures 2.1-2 and 2.1-3
2.0 A.3	<p>Unit 1 CTS 2.1.1 contains a Note and an additional Figure, Figure 2.1-1a, which is to be used for the period of operation until steam generator replacement. ITS 2.1.1 does not contain a similar Note or additional Figure.</p> <p>This change is acceptable because the North Anna Unit 1 steam generators have been replaced and the Note and the Figure are no longer applicable. This change is designated as administrative because it eliminates information from the CTS that is no longer applicable.</p>	None	Unit 1 2.1.1, Unit 1 Figure 2.1-1a

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ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 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>	None	Various

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ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.2	<p>Unit 1 CTS 3.0.1 states, “Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification.” Unit 2 CTS 3.0.1 states, “Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.” ITS LCO 3.0.1 states, “LCOs shall be met during the MODES or other specified conditions in the Applicability, except as noted in LCO 3.0.2 and 3.0.7.” This results in several changes to the CTS.</p> <ul style="list-style-type: none"> <li>• Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, “Limiting Conditions for Operation” is changed to “LCOs”, and “OPERATIONAL MODES or other conditions specified” is changed to “MODES and other specified conditions” to be consistent with the ITS definition of MODE and the terminology used in the ITS. These changes are acceptable because they result in no change in the intent or application of the specification, but merely reflect editorial preferences used in the ITS.</li> <li>• The Unit 1 phrase “. . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . .” and the Unit 2 phrase “. . . except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met” are moved from CTS 3.0.1 to ITS LCO 3.0.2 which states that when an LCO is not met, the Required Actions must be met. The change is acceptable because moving this information within the Technical Specifications results in no change in the intent or application of ACTIONS.</li> <li>• The Unit 1 CTS 3.0.1 phrase “Limiting Conditions for Applicability . . . shall be applicable” and the Unit 2 CTS 3.0.1 phrase “Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required” are replaced in ITS LCO 3.0.1 with the phrase “LCOs shall be met.” This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (e.g., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (e.g., the requirements in the LCO apply.) This change is acceptable because it is an editorial change that does not change the intent of the requirements.</li> </ul>	LCO 3.0.1	3.0.1

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ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.2 (con't)	<ul style="list-style-type: none"> <li data-bbox="314 267 1413 447">• The phrase “except as provided in LCO 3.0.2 and LCO 3.0.7” is added to CTS 3.0.1. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. This change is acceptable because adding the exception for LCO 3.0.2 and LCO 3.0.7 prevents a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Specifications.</li> </ul> <p data-bbox="314 478 1413 547">These changes are designated administrative because they are editorial and result in no technical changes to the Technical Specifications.</p>	LCO 3.0.1	3.0.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.3	<p>Unit 1 CTS 3.0.2 states, “Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.” Unit 2 CTS 3.0.2 states the same requirements, but in the negative, as, “Noncompliance with a specification shall exist when the requirements of the Limiting Conditions for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Conditions for Operation is restored prior to expirations of the specified time intervals, completion of ACTION requirements is not required.” ITS LCO 3.0.2 states, “Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.” This results in several changes to the CTS.</p> <ul style="list-style-type: none"> <li>• The first sentence in Unit 1 CTS 3.0.2, states, in part, “Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the Specification.” This requirement is divided into portions of ITS LCO 3.0.1, “LCOs shall be met” and ITS LCO 3.0.2, “Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met”.</li> </ul> <p>This change is acceptable because the intent of the CTS requirement is preserved, but the aspects of LCO compliance and the performance of ACTIONS when the LCO is not met are separated.</p> <ul style="list-style-type: none"> <li>• Unit 2 CTS 3.0.2, states, “Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals.” This sentence is deleted. This information currently is stated in Unit 2 CTS 3.0.1 and is moved to ITS 3.0.2 as described in Discussion of Change A.2. ITS 3.0.2 states that the Required Actions are to be taken when the LCO is not met. This rearrangement separates the description of LCOs (in ITS LCO 3.0.1) and the description of Required Actions (in ITS LCO 3.0.2).</li> </ul> <p>This change is acceptable because it makes the Unit 1 and Unit 2 descriptions of LCOs and Required Actions identical and improves clarity, without changing the intent of the CTS.</p>	LCO 3.0.2	3.0.2

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.3 (con't)	<ul style="list-style-type: none"> <li data-bbox="318 251 1407 376">• The Unit 1 and Unit 2 CTS 3.0.2 are revised to include an exception for LCO 3.0.5 and 3.0.6. LCO 3.0.5 and LCO 3.0.6 are new allowances which take exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements.</li> </ul> <p data-bbox="318 407 1407 500">This change is acceptable because it includes references to new items in the ITS and results in no change to the CTS. Changes resulting from the incorporation of LCO 3.0.5 and LCO 3.0.6 are discussed in Discussions of Change L.2 and L.3.</p> <ul style="list-style-type: none"> <li data-bbox="318 531 1407 888">• The second sentence of Unit 1 CTS LCO 3.0.2 states, "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The second sentence of Unit 2 CTS LCO 3.0.2 states, "If the Limiting Conditions for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required." These sentences state the same requirement. They are replaced in ITS LCO 3.0.2 with, "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This change is acceptable because, while worded differently, both the CTS and ITS state that ACTIONS do not have to be completed once the LCO is met or is no longer applicable. ITS LCO 3.0.2 also adds the phrase, "unless otherwise stated." There are some ITS ACTIONS which must be completed, even if the LCO is met or is no longer applicable.</li> </ul> <p data-bbox="318 919 1407 982">This change is acceptable because it reflects a new feature in the ITS which did not exist in the CTS. The technical aspects of these changes are discussed in the appropriate ITS sections.</p> <p data-bbox="318 1013 1407 1075">These changes are designated as administrative because they are editorial and do not result in technical changes to the Technical Specifications.</p>	LCO 3.0.2	3.0.2

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.4	<p>CTS LCO 3.0.3 is applicable, “when a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements.” ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable, “when an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS.” This changes the CTS to add two new applicability conditions.</p> <ul style="list-style-type: none"> <li>• ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken.</li> </ul> <p>This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.</p> <ul style="list-style-type: none"> <li>• ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The current Technical Specifications do not contain requirements that direct entry into LCO 3.0.3. The ITS does contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected specifications.</li> </ul> <p>This change is acceptable because referencing a new feature in the ITS is an editorial change.</p> <p>These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.</p>	LCO 3.0.3	3.0.3
3.0 A.5	<p>CTS 3.0.3 states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS 3.0.3 states the time limits (Completion Times) from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3.</p> <p>These changes are acceptable because the ITS times are the sum of the CTS times (e.g., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours.) This changes the CTS presentation only, and the time allowed to enter each MODE is unchanged. Using MODE numbers instead of the corresponding MODE titles is an editorial preference which results in no change the requirements in the Technical Specifications. These changes are designated as administrative as they implement the editorial conventions used in the ITS without resulting in technical changes to the specifications.</p>	LCO 3.0.3	3.0.3

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.7	<p>Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." The Unit 2 CTS 3.0.4 is identical, except that the phrase, "unless otherwise excepted" is eliminated from the first sentence and a sentence is added stating, "Exceptions to these requirements are stated in individual specifications." ITS 3.0.4 states, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRC. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." The addition of the a) and b) conditions is described in Discussion of Change (DOC) L.1. The following changes are made to CTS 3.0.4:</p> <ul style="list-style-type: none"> <li>• Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." Unit 2 CTS 3.0.4 is the same, except as described above. ITS LCO 3.0.4 does not contain a discussion of exceptions, but LCO 3.0.4.c states that specific value or parameter allowances, as approved by the NRC, may be used. The list of value or parameter allowances is in the Bases and lists LCO 3.4.16, RCS Specific Activity. This change is acceptable because the provisions in ITS LCO 3.0.4 eliminate the need for specific exceptions in individual specifications. The specific exceptions are eliminated from the specifications and discussed in specific DOCs in those specifications. Elimination of reference to these exceptions is acceptable because it does not technically change the specifications.</li> </ul> <p>This change is designated as administrative because the change is needed to reflect technical changes made in other specifications. The technical aspects of those changes are discussed in other DOCs.</p>	LCO 3.0.4	3.0.4

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9	<p>CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. The first sentence of CTS 4.0.3 states that failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The last sentence of CTS 4.0.3 states that Surveillance Requirements do not have to be performed on inoperable equipment. ITS SR 3.0.1 states that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits. Surveillances may be performed by means of any series of sequential, overlapping, or total steps. The changes to the CTS are:</p> <ul style="list-style-type: none"> <li>• The first sentence of CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. ITS SR 3.0.1 states that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR.</li> </ul> <p>This change is acceptable because the requirements are identical. Changes from Limiting Conditions for Operation to LCO, Surveillance Requirement to SR, and OPERATIONAL MODES to MODES are editorial preferences made to be consistent with the ITS format. This change is designated as administrative because the intent of the requirement is unchanged.</p>	SR 3.0.1	4.0.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9 (con't)	<ul style="list-style-type: none"> <li data-bbox="324 242 1413 500">• The first sentence of CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved to ITS SR 3.0.1 which states, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." This changes the CTS by adding the clarification, "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance."</li> </ul> <p data-bbox="324 522 1413 624">This change is acceptable because it is consistent with the current use and application of the Technical Specifications and with previous NRC guidance. This change is designated as administrative because it clarifies the Technical Specifications with no change in intent.</p> <ul style="list-style-type: none"> <li data-bbox="324 646 1413 842">• CTS 4.0.3 which states in part, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved from CTS 4.0.3 to ITS SR 3.0.1. ITS SR 3.0.1 states, "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3."</li> </ul> <p data-bbox="324 864 1413 966">This change is acceptable and is designated as administrative because moves information within the Technical Specifications with no change in intent. The reference to SR 3.0.3 is editorial and any technical changes resulting from SR 3.0.3 are discussed in another DOCs.</p> <ul style="list-style-type: none"> <li data-bbox="324 988 1413 1153">• CTS 4.0.3 states, in part, "Surveillance requirements do not have to be performed on inoperable equipment." ITS SR 3.0.1 states, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." This changes the CTS by including "variables within limits" in recognition that not all Surveillances test equipment, but may test variables such as boron concentration, power distribution factors, temperatures, and pressures. This does not change the current use and application of the statement in CTS 4.0.3.</li> </ul> <p data-bbox="324 1193 1413 1261">This change is acceptable and is designated as administrative because moves and clarifies information within the Technical Specifications with no change in intent.</p>	SR 3.0.1	4.0.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9 (con't)	<ul style="list-style-type: none"> <li data-bbox="318 261 1409 354">• ITS 3.0.1 states, in part, "Surveillances may be performed by means of any series of sequential, overlapping, and total steps. This changes the CTS by explicitly stating an accepted industry practice. This does not change the current use and application of the statement in CTS 4.0.1.</li> </ul> <p data-bbox="318 385 1409 447">This change is acceptable and is designated as administrative because it clarifies information within the Technical Specifications with no change in intent.</p>	SR 3.0.1	4.0.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.10	<p>CTS 4.0.2 states, “Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.” ITS SR 3.0.2 states, “The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as ‘once,’ the above interval extension does not apply. If a Completion Time requires periodic performance on a ‘once per . . .’ basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications.” This results in several changes to the CTS.</p> <ul style="list-style-type: none"> <li>• ITS SR 3.0.2 adds to the CTS, “For Frequencies specified as ‘once,’ the above interval extension does not apply. This is described in DOC M.2.</li> <li>• ITS SR 3.0.2 adds to the CTS, “If a Completion Time requires periodic performance on a ‘once per . . .’ basis, the above Frequency extension applies to each performance after the initial performance.” This is described in DOC L.5.</li> <li>• ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating, “as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.” This direction is consistent with the current use and application of the Technical Specifications.</li> </ul> <p>This change is acceptable because the ITS presentation has the same intent as the CTS requirement.</p> <ul style="list-style-type: none"> <li>• ITS SR 3.0.2 adds to the CTS, “Exceptions to this Specification are stated in the individual Specifications.”</li> </ul> <p>This change is acceptable because it reflects practices used in the ITS that are not used in the CTS. Any changes to a specification, by inclusion of such an exception, will be addressed in the affected specification.</p> <p>The changes are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.</p>	SR 3.0.2	4.0.2

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.12	<p>CTS 4.0.4 restricts entry into MODES or other conditions specified in the Applicability unless the applicable SRs have been successfully performed. ITS SR 3.0.4 contains the same restriction, but adds an allowance that, "This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS in two ways:</p> <ul style="list-style-type: none"> <li>• ITS SR 3.0.4 adds an allowance that failure to perform a Surveillance will not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.</li> </ul> <p>This change is acceptable because it is consistent with the current understanding and application of CTS 4.0.4 and is necessary to avoid a conflict between SR 3.0.4 and other Specifications.</p> <ul style="list-style-type: none"> <li>• ITS SR 3.0.4 adds an allowance that failure to perform a surveillance will not prevent entry into MODES or other specified conditions in the Applicability "that are part of a shutdown of the unit." ITS SR 3.0.4 is also only applicable in MODES 1, 2, 3 and 4. These changes are addressed in DOC L.4.</li> </ul> <p>This change is designated as administrative because there is no change in the intent of CTS 4.0.4 and no additional flexibility granted.</p>	SR 3.0.4	4.0.4

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 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>	None	Various
3.1.1 A.2	<p>CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3 and 4. CTS 3.1.1.2 provides SDM requirements in MODE 5. ITS 3.1.1 provides SDM requirements in MODE 2 with <math>K_{eff} &lt; 1.0</math> and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements for MODE 2 with <math>K_{eff} &lt; 1.0</math> and MODES 3, 4, and 5. The change in Applicability for MODE 1 and MODE 2 with <math>K_{eff} \geq 1.0</math> are described in DOC A.3.</p> <p>This change is acceptable because the requirements have not changed. Combining the specifications is an editorial change. Any technical changes resulting from this combination are discussed in other DOCs. This change is designated as administrative because it does not result in a technical change to the specification.</p>	3.1.1	3.1.1.1 and 3.1.1.2
3.1.1 A.3	<p>CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3 and 4. Surveillance 4.1.1.1.b states that when in MODES 1 and 2 with <math>K_{eff} \geq 1.0</math>, SDM is verified by verifying that the control banks are within the insertion requirements of CTS 3.1.3.6, Control Rod Insertion Limits. ITS 3.1.1 is Applicable in MODE 2 with <math>K_{eff} &lt; 1.0</math> and MODES 3, 4, and 5. ITS 3.1.5 contains the control bank insertion requirements. This changes the CTS by dividing the SDM requirements and placing those applicable in MODE 2 with <math>K_{eff} &lt; 1.0</math> <math>\Delta k/k</math> and MODES 3, 4, and 5 in ITS 3.1.1 and placing those applicable in MODE 1 and MODE 2 with <math>K_{eff} \geq 1.0</math> in the control bank specifications.</p> <p>The purpose of CTS 3.1.1.1 is to ensure that the SDM assumed in the accident analyses is available. When the reactor is critical, SDM is verified by ensuring that the control rods are above the rod insertion limits. The Applicability Bases to ITS 3.1.1 states that in MODES 1 and 2, SDM is ensured by complying with LCO 3.1.5, Shutdown Bank Insertion Limits" and LCO 3.1.6, "Control Bank Insertion Limits." This change is acceptable because the SDM requirements have not changed. Even though CTS 3.1.1.1 is applicable in MODES 1 and 2, the CTS Surveillances state that it is verified by meeting the rod insertion limits. The ITS also verifies SDM in MODES 1 and 2 via the rod insertion limits. Any changes to the rod insertion limit requirements will be discussed in DOCs for those specifications. This change is designated as administrative because it does not result in a technical change to the specification.</p>	3.1.1	3.1.1.1, 4.1.1.1.b, 3.1.3.6

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 A.4	<p>The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, and 4 with a footnote stating, "See Special Test Exception 3.10.1." ITS 3.1.1 Applicability does not contain the footnote or a reference to the Special Test Exception.</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 administrative as it incorporates an ITS convention with no technical change to the Technical Specifications.</p>	None	3.1.1.1
3.1.2 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>	None	Various
3.1.2 A.2	<p>CTS Surveillance 4.1.1.1.2 requires the overall core reactivity balance be compared to predicted values to demonstrate agreement within +/- 1% <math>\Delta k/k</math>. ITS LCO 3.1.2 requires the measured core reactivity to be within +/- 1% <math>\Delta k/k</math> of predicted values. This changes the CTS by replacing the Surveillance requirement with an LCO.</p> <p>This change is acceptable because the requirements have not changed. Converting the requirement from a Surveillance in the SHUTDOWN MARGIN specification to an LCO is consistent with the ITS format and content guidance. Any technical changed resulting from this change are discussed in other DOCs. This change is designated as administrative because it does not result in a technical change to the specification.</p>	3.1.2	4.1.1.1.2
3.1.3 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>	None	Various

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 A.5	<p>CTS 3.1.1.4, Action a.1, states that if the MTC is more positive than the BOC (e.g., upper) limit, control rod withdrawal limits must be imposed within 24 hours or be in HOT STANDBY within 6 hours. ITS 3.1.3, ACTION A, states that with the MTC not within the upper limit, establish control rod withdrawal limits with 24 hours or be in MODE 2 with <math>K_{eff} &lt; 1.0</math> within 6 hours. This changes the CTS by requiring the plant to be in MODE 2 with <math>K_{eff} &lt; 1.0</math> instead of HOT SHUTDOWN (i.e., MODE 3).</p> <p>This change is acceptable because the requirements have not changed. In accordance with CTS LCO 3.0.1, Actions are only required to be followed while in the mode of applicability. The CTS upper MTC limit is applicable in MODES 1 and 2 with <math>K_{eff} \geq 1.0</math>. Therefore, under the CTS, the unit does not have to enter MODE 3 because the applicability of the action ends when in MODE 2 with <math>K_{eff} &lt; 1.0</math>. As a result, there is no difference between the CTS and ITS requirements. This change is designated as administrative because it does not result in a technical change to the specification.</p>	3.1.3, Action A	3.1.1.4, Action a.1
3.1.3 A.6	<p>CTS 3.1.1.4, Action a.1, states that when the MTC is more positive than the BOC limit, control rod withdrawal limits must be established. It also states, "these withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6." The ITS does not include this sentence.</p> <p>This change is acceptable because the requirements have not changed. The CTS reference to Specification 3.1.3.6 is an "information only" statement that neither adds, eliminates, or modifies requirements. The ITS convention is to not include these types of statements. This change is designated as administrative because it does not result in a technical change to the specification.</p>	None	3.1.1.4, Action a.1
3.1.4 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>	None	Various
3.1.4 A.2	<p>The Applicability of CTS 3.1.3.1 is modified by a footnote, designated "***", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.4 Applicability does not contain the footnote or a reference to the Special Test Exception.</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 administrative because it does not result in technical changes to the specifications.</p>	None	3.1.3.1

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

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

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

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 A.4	<p>CTS 3.1.3.5, Action b, states, in part, that "With a maximum of one shutdown bank inserted beyond the insertion limit specified in the CORE OPERATING LIMITS REPORT during surveillance testing pursuant to Specification 4.1.3.1.2 and immovable due to malfunctions in the rod control system, POWER OPERATION may continue provided that: . . . 2. the affected bank is trippable, 3. each shutdown and control rod is aligned to within +/- 12 steps of its respective group step counter demand position . . ." ITS 3.1.5, Condition B, states, in part, "One shutdown bank inserted <math>\leq</math> 18 steps below the insertion limit and immovable AND each control and shutdown bank within the limits of LCO 3.1.4." ITS LCO 3.1.4 requires that all shutdown and control banks be OPERABLE (which is defined as "trippable,") and individual indicated rod positions be within 12 steps of their group step counter demand position. This changes the CTS by substituting a reference to LCO 3.1.4 for the explicit requirements in the CTS action.</p> <p>This change is acceptable because the requirements have not changed. The CTS requirements have been rearranged. This change is designated as administrative as the technical requirements have not changed.</p>	3.1.5, Condition B	3.1.3.5, Action b
3.1.6 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>	None	Various
3.1.6 A.2	<p>The Applicability of CTS 3.1.3.6 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." ITS 3.1.6 Applicability does not contain the footnote or a reference to the Special Test Exceptions.</p> <p>The purpose of the footnote reference is to alert the reader that Special Test Exceptions exist which may modify the Applicability of the specification. It is an ITS convention to not include these types of footnotes or cross-references as they are not required. The referenced items apply whether or not they are cross-referenced. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	None	3.1.3.6

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

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

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.7 A.5	<p>CTS 3.1.3.2.a states "Each individual rod position indicator channel, 1 per rod, accurate to within +/- 12 steps* of actual rod position." Footnote "*" states, "Below 50% power each individual rod position indicator may be more than +/- 12 steps from its group step counter demand position for a maximum of one hour in every 24. During this hour, each individual rod position indicator may be no more than +/- 24 steps from its demand position." ITS 3.1.7 states, "The Rod Position Indication (RPI) system and the Demand Position Indication System shall be OPERABLE." ITS LCO 3.1.4 states, "All shutdown and control rods shall be OPERABLE AND individual indicated rod positions shall be within 12 steps of their group step counter demand position." ITS LCO 3.1.4 is modified by a Note which states, "When THERMAL POWER is <math>\leq</math> 50% RTP, the indicated position of each rod as determined by its individual rod position indicator may be within 24 steps from its group step counter demand position for up to 1 hour per 24 hours. This NOTE is not applicable for control rods known to be greater than 12 steps from the rod group step counter demand position." This changes the CTS by moving the requirement that the RPI indicate within 12 or 24 steps of the actual position to LCO 3.1.4.</p> <p>This change is acceptable because the technical requirements have not changed. Both the CTS and the ITS requires the RPI system to indicate the rod position within 12 steps. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	LCO 3.1.4, LCO 3.1.7	3.1.3.2.a, footnote *
3.1.8 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>	None	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 A.2	<p>CTS 3.1.1.3.2 states, "The following valves shall be locked, sealed or otherwise secured in the closed position except during planned boron dilution or makeup activities." ITS LCO 3.1.8 states, "Each valve used to isolate primary grade water flow paths shall be secured in the closed position." A Note to the LCO states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." ITS SR 3.1.8.1 states, "Verify each valve that isolates primary grade water flow paths is locked, sealed, or otherwise secured in the closed position."</p> <p>This change is acceptable because the technical requirements have not changed. In the ITS, requirements that valves be locked, sealed, or otherwise secured are located in the Surveillances, not the LCO. Under SR 3.0.1, the SRs provide requirements necessary to meet the LCO. Therefore, moving the requirement from the LCO to the SR has no effect on the application of the requirements. The addition of the phrase "under administrative control" to the LCO Note is consistent with the ITS conventions and does not change the application of the Note. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	LCO 3.1.8 Note, SR 3.1.8.1	3.1.1.3.2
3.1.8 A.3	<p>CTS 3.1.1.3.2 is applicable in MODES 3, 4, 5 and 6. The CTS Action states that with the valves not locked, sealed, or otherwise secured in the closed position, suspend CORE ALTERATIONS. ITS 3.1.8 is applicable in MODES 3, 4, and 5 and does not contain this Action.</p> <p>This change is acceptable because CORE ALTERATIONS cannot occur in MODES 3, 4, or 5. ITS 3.9.2 provides similar requirements on primary grade water flow path in MODE 6 and that specification will address Actions in that MODE. Any technical changes in the Actions in MODE 6 will be addressed in the DOCs for that specification. This change is designated as administrative because it divides Actions according the applicable MODE with no technical change to the specifications.</p>	None	3.1.1.3.2
3.1.9 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>	None	Various

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A.1	<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>	None	Various
3.2.1 A.2	<p>CTS 3.2.2 provides the limit for FQ(Z). The LCO provides two equations, which give the FQ(Z) limit for power &gt; 50% RTP and power ≤ 50% RTP. ITS 3.2.1 does not contain these equations.</p> <p>This change is acceptable because the technical requirements have not changed. CTS Surveillance 4.2.2.2 states "FQM(Z) shall be evaluated to determining if FQ(Z) is within limit by: . . . c. Satisfying the following relationship" and provides two equations. These equations for FQM(Z) are always more limiting than the equations presented in the LCO. Under CTS 4.0.1 and ITS SR 3.0.1, failure to meet the SR results in failure to meet the LCO. Therefore, the equations presented in the LCO are never limiting. In the ITS, the equations presented in the CTS Surveillance 4.2.2.2 are used to establish the LCO limit. This change is designated as administrative because it eliminates information from the CTS that is not used.</p>	None	3.2.2
3.2.1 A.3	<p>CTS 3.2.2 provides a limit for FQ(Z). The Actions for CTS 3.2.2 apply when FQ(Z) exceeds its limit. ITS 3.2.1 states, "FQ(Z), as approximated by FQM(Z), shall be within the limit specified in the COLR." The ITS Condition is, "FQM(Z) not within limit." ITS SR 3.2.1.1 requires verification that FQM(Z) is within its limit. This changes the CTS by stating the limited value as FQM(Z) instead of FQ(Z).</p> <p>This change is acceptable because the requirements have not changed. CTS SR 4.2.2.2, which is used to determine if FQ(Z) is within its limit, is written in terms of the measured FQ(Z), given as FQM(Z). The value used to determine if FQ(Z) is within its limit in CTS SR 4.2.2.2.c is FQM(Z). Therefore, the ITS use of FQM(Z) is consistent with the CTS limits. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	3.2.1	3.2.2

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A.4	<p>CTS 4.2.2.1 states, "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement.</p> <p>The purpose of a Specification 4.0.4 exception is to allow the plant to enter the MODE of applicability without performing the required Surveillances. This change is acceptable because the CTS Specification 4.0.4 exception is not used. CTS 4.2.2.2 is modified by a Note which states, "During power escalation, the power level may be increased until a power level for extended operation has been achieved and a power distribution map obtained." Therefore, the CTS Surveillance Note provides the allowance to enter MODE 1 and increase power without performing the Surveillance. This serves the same purpose as the Specification 4.0.4 exception. The ITS does not need the exception because ITS Surveillance 3.2.1.1 contains the same Note as the CTS Surveillance. This change is designated as administrative because it eliminates a CTS provision which is not used.</p>	None	4.2.2.1
3.2.1 A.5	<p>ITS 3.2.1, Action A.2.1, A.2.2, and A.2.3 state that the Required Actions must be taken "after each FQM(Z) determination." CTS 3.2.2, Action a, does not explicitly state this requirement.</p> <p>This change is acceptable because it does not result in a technical change to the specifications. The CTS is understood to apply after each measurement of FQM(Z). This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.2.1, Required Actions A.2.1, A.2.2, A.2.3.	3.2.2, Action a
3.2.2 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>	None	Various

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 A.4	<p>CTS 4.2.3.1 states that FNΔH shall be determined to be within its limit by using the moveable incore detectors to obtain a power distribution map. ITS SR 3.2.2.1 states that FNΔH shall be verified to be within the limits specified in the COLR. This changes the CTS by eliminating the statement that FNΔH must be determined by using the moveable incore detector system to obtain a power distribution map.</p> <p>This change is acceptable because the requirements have not changed. Stating that FNΔH must be measured by using the incore mapping system to obtain a power distribution map is unnecessary, as FNΔH can only be measured with the incore mapping system to create a power distribution map. Therefore, eliminating a statement of the method that must be used to measure FNΔH does not change the specifications. This change is designated as administrative because it does not result in technical changes to the specifications.</p>	SR 3.2.2.1	4.2.3.1
3.2.2 A.5	<p>CTS 4.2.3.1.c states, "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement.</p> <p>The purpose of a Specification 4.0.4 exception is to allow the plant to enter the MODE of applicability without performing the required Surveillances. This change is acceptable because the CTS Specification 4.0.4 exception is not required in the ITS. CTS 4.2.3.1 is required to be performed prior to operation above 75% RTP after each fuel loading and once per 31 EFPD. Without the SR 4.0.4 exception, MODE 1 could not be entered without a measurement because the "once per 31 EFPD" Frequency would be violated under SR 4.0.4 because Surveillances must be met prior to entering the MODE of applicability. However, under the ITS, the Frequency "Once after each refueling prior to THERMAL POWER exceeding 75% RTP AND 31 EFPD thereafter," means that the 31 EFPD Frequency does not apply until after the 75% RTP measurement is performed. Therefore, the applicability of the SR is changed and MODE 1 can be entered without the SR being met. This change is designated as administrative because it does not result in technical changes to the specifications.</p>	None	4.2.3.1
3.2.3 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>	None	Various

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.3 A.2	<p>CTS 3.2.1, Action a, states that with AFD outside its limit, restore the indicated AFD to within its limit within 15 minutes or reduce THERMAL POWER to less than 50% RTP within 30 minutes. ITS 3.2.3, Condition A, states that with AFD not within limits, reduce THERMAL POWER to less than 50% within 30 minutes. This changes the CTS by eliminating the action to restore AFD within its limit within 15 minutes.</p> <p>This change is acceptable because the technical requirements have not changed. If AFD is not restored to within its limit within 15 minutes, no CTS Actions apply except to reduce power to less than 50% RTP within 30 minutes. Therefore, the action to restore AFD to within its limit within 15 minutes contains no requirement to take action. Both the CTS and the ITS require power to be reduced to less than 50% RTP within 30 minutes if AFD is not restored to within its limit. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	3.2.3, Condition A	3.2.1, Action a
3.2.3 A.3	<p>CTS 3.2.1, Action b, states, "THERMAL POWER shall not be increased above 50% of RATED THERMAL POWER unless the indicated AFD is within the limits specified in the CORE OPERATING LIMITS REPORT." ITS 3.2.3 does not contain a similar requirement. This changes the CTS by eliminating a prohibition in the CTS.</p> <p>This change is acceptable because the requirements have not changed. CTS 3.0.4 and ITS LCO 3.0.4 prohibit entering the MODE of applicability of a specification unless the requirements of the LCO are met. CTS 3.2.1 and ITS 3.2.3 are applicable in MODE 1 with THERMAL POWER 50%. Therefore, the Use and Application rules in the CTS and the ITS prohibit exceeding 50% of RATED THERMAL POWER without the LCO requirements met. CTS 3.2.1, Action b, is duplicative of CTS 3.0.4 and ITS LCO 3.0.4 and its elimination does not make a technical change to the specifications. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	None	3.2.1, Action b
3.2.4 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>	None	Various

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

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 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
3.3.1 A.2	<p>The Functional Units required to be OPERABLE for the Reactor Trip System (RTS) instrumentation are shown in CTS Table 3.3-1. The Table defines each function with specific requirements for Channels, Applicable MODES, and Actions. A Note is added to ITS 3.3.1 Actions, which states, "Separate Condition entry is allowed for each Function." This modifies the CTS by providing a specific allowance to enter each Function separately.</p> <p>This change is acceptable because it clearly states the current requirement. The CTS considers each function to be separate and independent from the other functions. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.3.1 ACTIONS Note	Table 3.3-1
3.3.1 A.3	<p>The Action for CTS LCO 3.3.1.1 states, "As shown in Table 3.3-1." ITS LCO 3.3.1 Action A states, "One or more Functions with one or more channels inoperable, enter the Condition referenced in Table 3.3.1-1 for the channel(s), immediately."</p> <p>This change is acceptable because it maintains the CTS requirements in the ITS format. The CTS and ITS refers to a Table for the requirements on each function. Any change to the functional requirements will be discussed by a specific discussion of change. This change modifies the format of the specifications but not the technical requirements. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.3.1 ACTION A	3.3.1.1 Action

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

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

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

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.15	<p>CTS 3.3.1.1 requirements for Functional Unit 6.C, Source Range Neutron Flux Shutdown, are stated in CTS Table 3.3-1. The total number of Source Range channels is listed as two, and the minimum channels OPERABLE is listed as one. Note 5 does not require any action unless no channels are OPERABLE. This requirement is applicable in MODES 3, 4, and 5 with the RTBs open. ITS 3.3.1 requirement for the Source Range Neutron Flux, Function 5, is stated in ITS Table 3.3.1-1, and lists the number of required channels as one. The Table lists the applicability or other specified conditions as MODES 3(e), 4(e), and 5(e). Note (e) states, "With the Rod Control System incapable of rod withdrawal. In this condition, source range Function does not provide reactor trip but does provide indication." This change maintains the CTS technical requirements for the number of OPERABLE Source Range channels. The addition of Note (e) is addressed in DOC L.29.</p> <p>This change is acceptable because the CTS requirements are maintained with the conversion to the ITS format. The ITS number of required Source Range channels is one, which is the same as the CTS requirement. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	Table 3.3.1-1	Table 3.3-1
3.3.1 A.16	<p>CTS functions for the RTS Interlocks in Table 3.3.-1 require Action 17 to be entered for an inoperable channel. Action 17 states with less than the Minimum Channels OPERABLE, within one hour verify that the interlocks are in the required state for plant conditions, or apply Specification 3.0.3. ITS function 18, the RTS interlocks list Conditions Q and R to be entered for an inoperable channel. Required Action Q.2 requires the unit to be placed in MODE 3 within 7 hours. Required Action R.2 requires the unit to be placed in MODE 2 within 7 hours. This changes the CTS from the LCO 3.0.3 statement to specific required actions to be performed.</p> <p>This change is acceptable because the ITS Required Actions place the unit in a condition within the time allowed by CTS LCO 3.0.3 for each of the functional interlocks. Function P-6 and P-10 are required to be OPERABLE in MODE 2 therefore the required action places the unit into MODE 3 within 7 hours. Functions P-7, P-8, and P-13 are required to be OPERABLE in MODE 1, therefore the required action requires the unit to be placed in MODE 2 with 7 hours. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	Table 3.3.1-1	Table 3.3.-1

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

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.20	<p>The requirements in CTS Table 3.3-1 for the Reactor Trip System low power interlocks list function 23.B as P-7, comprised of three channels of P-10 input or two channels of P-13 input. These interlocks are required to be OPERABLE from the surveillance requirement 4.3.1.1.2, associated with CTS 3.3.1.1. The P-10 and P-13 interlocks are required to provide a signal at a specific indicated power level, from either the neutron detectors (P-10-Power Range Neutron Flux) channels, or power indication of the main turbine (P-13-turbine impulse chamber pressure) channels. The P-10 and P-13 function are required to actuate at a specific setpoint with a tolerance up to the allowable value. The P-7 interlock is derived from P-10 and P-13 functions and is a logic function only. ITS 3.3.1, Table 3.3.1-1, list the Reactor Trip System Interlocks as Function 18, and the P-7 function is Function 18b. Function 18d and 18e represent the P-10 and P-13 interlocks. P-10 and P-13 functions are required to actuate and provide its specific interlocks at a specific setpoint with an allowance up to an allowed value. The P-7 Function is not a channel related interlock, but functions on a train related basis; therefore, the channel requirements for P-7 are stated as, "1 per train." Because the P-7 interlock is a logic function, there is no setpoint or allowable value limit associated with the function.</p> <p>This change is acceptable because all technical requirements of the CTS are reflected in the ITS requirements. The requirements of ITS 3.3.1 Function 18 b for P-7 has not modified the CTS requirements, except only in format. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	Table 3.3.1-1	Table 3.3-1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.21	<p>CTS requirements for the Power Range Instrumentation channels are listed in Table 3.3-1. This states four total channels are required in MODES 1 and 2 and Action 2# must be entered for an inoperable channel. The Limiting Safety System Settings listed in CTS Table 2.2-1 specifies for the Power Range Neutron Flux two trip setpoints and allowable values. These are divided into Low and High values. The P-10 interlock in CTS Table 3.3-1 describes the requirements for enabling the Power Range Neutron Flux Low setpoint trip below the specified values. The ITS in Table 3.3.1-1 states the Power Range Neutron Flux channels, functions 2a and 2b, are to be OPERABLE in two states, High and Low Neutron Flux, with four channels required to be OPERABLE. The functions are applicable in MODES 1 and 2 for the High and MODES 1(b) and 2 for the Low. For the Power Range Low function Action E is required to be entered. Action E requires the channel to be placed in trip within 72 hours or be in MODE 3 within the next 6 hours. Note (b) states, "Below the P-10 (Power Range Neutron Flux) setpoint. This change maintains the technical requirements of the CTS as they are translated to the ITS format.</p> <p>This change is acceptable because all technical requirements of the CTS are maintained by the conversion to the ITS. The ITS presentation of the CTS requirements only modifies the format and does not add or delete any technical requirements. The Power Range functions continue to require four channels to be OPERABLE in MODES 1 and 2, with the trip setpoints for High and Low Neutron Flux values required above and below the P-10 interlock. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	Table 3.3.1-1, 3.3.1 ACTION E	Table 3.3-1, Table 2.2-1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.22	<p>CTS Table 3.3-1 Functions 18.a (Low Auto Stop Oil Pressure) and 18.b (Turbine Stop Valve Closure) requires the functions to be OPERABLE in MODE 1 and Action 9 to be entered for an inoperable channel. Action 9 requires an inoperable channel be placed in trip within 72 hours or reduce power to less than P-8 setpoint within the next 4 hours. ITS Table 3.3.1-1 Function 16 Turbine Trip with Low Auto Stop Oil Pressure (16a) and Turbine Stop Valve Closure (16b) lists the applicable MODES as MODE 1(g). Note (g) states, "Above the P-8 (Power Range Neutron Flux) interlock." The Table lists Condition N to be entered for an inoperable channel. Condition N states, "One Turbine Trip channel inoperable place the channel in trip," within 72 hours, or "Reduces power &lt; P-8," within 76 hours. A Note modifies Condition N that states, "The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels." The addition of this Note is addressed by DOC L.26. This changes the format of the CTS while maintaining the technical requirements.</p> <p>This change is acceptable because the technical requirements of the CTS for the required trips from the Turbine Trips are maintained in the ITS. Any technical changes are address in other discussion of changes in this section. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	Table 3.3.1-1 Note g, ACTION N Note	Table 3.3-1 Action 9
3.3.1 A.23	<p>CTS 3.3.1.1 for Functional Units 19, 21, and 22 lists the test requirements for the Safety Injection (SI) input to Engineered Safety Features (ESF), Reactor Trip Breakers (RTBs), and Automatic Trip Logic. Each of these functions must be tested monthly. This Frequency is modified by Note (5), which states, "Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS (STB)." ITS notation for STB utilizes a definition that states the frequency as 31 days on a STB for the RTBs, Function 19, and the Automatic Trip Logic, Function 21. This change maintains the required testing frequency for each required safety function.</p> <p>This change is acceptable because the testing of the functions will continued to be required at the same frequency. The CTS definition for STB requires all trains or channels to be tested within the allowed time stated by the Frequency. ITS definition for STB states that the Frequency listed is the time for one train or channel to be tested. Under the CTS Frequency for the listed functions, two trains must complete the required testing in 62 days. The ITS Frequency requirement for each of these functions requires a train to be tested every 31 days with both trains completed in 62 days. Therefore, the testing requirements in the CTS and ITS require the same frequency for each function. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.3.1.4 SR 3.3.1.5	Table 3.3-1 Note (5)

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.24	Not used.	N/A	N/A
3.3.1 A.25	<p>CTS Table 4.3-1 Function 18, Turbine Trip, specifies a CHANNEL FUNCTIONAL TEST with a frequency of S/U (1). The S/U stands for prior to a reactor startup and Note (1) specifies "If not performed within the previous 31 days." Action 9 must be entered for an inoperable channel. Action 9 states, "With the number of channels OPERABLE less than the Total Number of Channels OPERABLE requirement, STARTUP and POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 72 hours and the Minimum Channels OPERABLE Requirement is met or reduce power to less than the P-8 setpoint in the next 4 hours." ITS Table 3.3.1-1 Function 16 Turbine Trip requires SR 3.3.1.15, a TADOT, to be performed. The Frequency for the SR states, "prior to exceeding the P-8 interlock whenever the unit has been in MODE 3, if not performed within the previous 31 days." A Note to the SR states, "Verification of setpoint is not required." This changes the CTS surveillance requirement frequency from startup, if not performed in the previous 31 days, to prior to exceeding P-8 setpoint whenever the unit has been in MODE 3, if not performed in the previous 31 days and specifically states that verification of the setpoint is not required.</p> <p>This change is acceptable because the frequency of the required test continues to be performed in the same time period as required by the CTS. The ITS Frequency is set to be consistent with the MODE of applicability for the Turbine Trip function. The intent of the CHANNEL FUNCTIONAL TEST in the CTS is to ensure that the turbine trip signal would generate a reactor trip signal. The CTS requirement for a CFT is satisfied by a turbine trip below the setpoint of P-8. This test produces lit annunciators in the main control room that signifies that the turbine trip would occur. This test corresponds to the ITS requirement of a Trip Actuation Device Operational Test (TADOT) without a setpoint verification which verifies that a turbine trip would occur. The ITS TADOT satisfies the technical requirements of the CTS CFT. Therefore, the addition of the ITS Note stating that no verification of setpoint is required is not a change in the requirement, but is provided for clarification. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.3.1.15	Table 4.3-1 Note (1)

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

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.29	<p>CTS Table 4.3-1 lists for the Power Range Low Setpoint and Intermediate Range channels a quarterly test to be performed (Q (12)). Note (12) states, "Quarterly Surveillance in MODE 3*, 4*, and 5* shall also include verification that Permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window." ITS SR 3.3.1.8 for the Source, Intermediate, and Power Range Neutron Flux Low Setpoint channels require a CHANNEL OPERATIONAL TEST (COT) to be performed every 92 days. A Note modifies the SR that states, "This Surveillance shall include verification that interlocks P-6 and P-10 are in their required state for existing unit conditions." The movement of the phrase, "by observation of the permissive annunciator window," is addressed by DOC LA.6. The deletion of quarterly surveillance in MODES 3*, 4*, and 5* is addressed by DOC L.10. This changes the CTS by reformatting the requirement to the ITS SR 3.3.1.8 Note. The purpose of ITS SR 3.3.1.8 Note is to ensure the interlocks P-6 and P-10 are in the proper state for the indicated power level from the appropriate NIS channels.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in ITS format. The CTS and ITS require the verification of P-6 and P-10 interlocks are in the required state for existing plant conditions. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.3.1.8 Note	Table 4.3-1 Note (12)
3.3.2 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
3.3.2 A.2	<p>CTS Actions a and b for LCO 3.3.2.1 require the applicable Action requirements of Table 3.3-3 be entered for an inoperable channel until the required channel is restored to OPERABLE status. ITS LCO 3.3.2 Action A states for an ESFAS function with one or more required channels or trains inoperable, the referenced Condition in Table 3.3.2-1 for the channel(s) or train(s) be entered immediately. The Actions of the ITS are modified by a Note which states, "Separate Condition entry is allowed for each Function."</p> <p>This change is acceptable because it clearly states the current requirement. The CTS considers each function to be separate and independent from the other functions. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.3.2 ACTIONS NOTE	3.3.2.1 Actions a and b

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

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

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.9	<p>CTS Surveillance Requirement 4.3.2.1.2 requires the ENGINEERED SAFETY FEATURES RESPONSE TIME test on each ESFAS function be performed at least once per 18 months. The requirement states, "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that both logic trains are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3." ITS SR 3.3.2.9 requires the verification that ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS. The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS..</p> <p>This change is acceptable the requirements for ESFAS RESPONSE TIME testing for the ESFAS channels remain unchanged. ITS definition for STAGGERED TEST BASIS and its application in this requirement do not change the current testing frequency requirements. The change is designated as administrative change because it does not result in technical change to the CTS requirements.</p>	SR 3.3.2.9	4.3.2.1.2
3.3.2 A.10	<p>CTS ESFAS system interlocks P-11 and P-12 are required to be OPERABLE in MODES 1, 2, and 3. If a channel becomes inoperable, Action 22 must be entered. The Action requires with less that the Minimum Channels within 1 hour determine, "that the interlock is in its required state for the existing plant condition or apply Specification 3.0.3." ITS requirements for the ESFAS interlocks P-11 and P-12 require the functions to be OPERABLE in MODES 1, 2, and 3. If a channel becomes inoperable Action J must be entered. The Action requires a verification of the interlocks are in their required state for plant conditions within 1 hour or be in MODE 3 within 7 hours and MODE 4 within 13 hours. This changes the CTS by specifically stating shutdown requirements in specified time requirements in the Action.</p> <p>This change is acceptable because the Required Actions and Completion Times are the same as the CTS requirements. CTS LCO 3.0.3 allows 1 hour and 6 additional hours to reach HOT STANDBY and 6 more hours to reach HOT SHUTDOWN. This change maintains the technical requirements of the CTS in the ITS format. The change is designated as administrative because the technical requirements remain unchanged.</p>	3.3.2 ACTION J	Table 3.3-3 Action 22

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

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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.15	<p>CTS requirements in Table 3.3-3 for ESFAS Function 3.b.3, Containment Isolation Phase B Containment Pressure High-High state that 4 channels are required. The function is required to be OPERABLE in MODES 1,2,3, and 4 with Action 16* to be entered for an inoperable channel. CTS requirements in Table 3.3-3 for ESFAS Function 2.c, Containment Spray on Containment Pressure High-High state that 4 channels are required. The function is required to be OPERABLE in MODES 1,2,3, and 4 with Action 16* to be entered for an inoperable channel. ITS in Table 3.3.2-1 Function 3.b.3, Containment Isolation Phase B on Containment Pressure High High, states, "Refer to Function 2.c (Containment Spray – Containment Pressure High High) for all functions and requirements." This changes the CTS by deleting the specific requirements for the Containment Isolation Phase B on Containment Pressure High High requirements and referring the function to the Containment Spray Containment Pressure High High for the specific requirements.</p> <p>This change is acceptable because there are no separate signals from Containment Pressure channels to initiate the Phase B Containment Isolation function. The Containment Spray Containment Pressure High High signal is the same signal that initiates the Phase B Containment Isolation signal. The change is designated as administrative change because it does not result in technical change to the CTS requirements.</p>	Table 3.3.2-1	Table 3.3-3
3.3.2 A.16	<p>CTS Surveillance Requirement 4.3.2.1.2 states that the Engineered Safety Feature Response Time of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Under the CTS, it is recognized that a Response Time Test is not required for the manual initiation and automatic actuation logic portions of the ESFAS functions. These portions of the function are tested by other Surveillances. ITS 3.3.2 replaces the general statement in CTS 4.3.2.1.2 with specific testing requirements for each function. For those portions of the ESFAS functions that a Response Time Test is appropriate, ITS SR 3.3.2.9 is required. This changes the CTS by explicitly recognizing those portions of ESFAS functions for which a Response Time Test is not required.</p> <p>This change is acceptable because it explicitly states the portions of ESFAS functions for which a Response Time Test is required. The ITS and CTS Response Time Testing requirements are the same. The change is designated as administrative because it does not result in technical change to the CTS requirements.</p>	None	4.3.2.1.2
3.3.2 A.17	Not Used		

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.18	<p>CTS Table 3.3-3 allows one channel of certain functional units to be bypassed for up to 4 hours to perform surveillance testing. A Note for ITS 3.3.2 Required Action C states, "One train may be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE." This rewords the CTS by specifically stating that surveillance testing can only be performed when the remaining train is OPERABLE. The purpose of the ITS Note phrase, "provided the other train is OPERABLE," is to remind the SR performer that there are only two trains of Automatic Actuation Logic and Actuation Relays for SI, Containment Spray, and Containment Isolation. With one train inoperable, testing the other train would disable the safety function.</p> <p>This change is acceptable because it restates the CTS requirements in more clearly defined terms. The CTS requirements are maintained in ITS format. The change is designated as an administrative change because it does not result in technical change to the CTS requirements.</p>	3.3.2 Required Action C Note	Table 3.3-3
3.3.2 A.19	<p>CTS Table 4.3 – 2 Functional Units 1.b, 2.b, 3.b.1, 3.b.2, 4.b, 5.b, and 6.b1, the Automatic Actuation Logic for SI, Containment Spray, Containment Isolation (Phases A and B), Steam Line Isolation, Turbine Trip and Feedwater Isolation, AFW pump, and the Automatic Actuation Logic and Actuation Relays for Steam Line Isolation require a monthly CHANNEL FUNCTIONAL TEST to be performed. The surveillance frequency is modified by Note (2) that states, "Each train or logic channel shall be functionally tested at least every other 31 days . . ." ITS Surveillance Requirements (SR) for the Automatic Actuation Logic and Actuation Relays for SI, Containment Spray, Containment Isolation (Phase A Isolation and Phase B Isolation), Steam Line Isolation, Turbine Trip and Feedwater Isolation, and AFW, require SRs 3.3.2.2 and 3.3.2.3 to be performed. ITS SR 3.3.2.2 requires the performance of an ACTUATION LOGIC TEST (ALT) and ITS SR 3.3.2.3 states that a MASTER RELAY TEST (MRT) must be performed. The Frequency of both ITS SRs is "31 days on a STAGGERED TEST BASIS." This changes the CTS SR Frequency from "every other 31 days" to the ITS requirement of "31 days invoking STAGGERED TEST BASIS" definition, while the CTS testing requirements are expressed in ITS terms of ALT and MRT.</p> <p>The purpose of the phrase "on a STAGGERED TEST BASIS" is to provide standard means of expressing the testing requirement frequency. The testing requirements of ALT and MRT continue to require the appropriate testing requirements for each safety function's Automatic Actuation Logic and Actuation Relays. This change is acceptable because the CTS testing requirements and frequencies are maintained in the ITS format. The change is designated as administrative change because it does not result in technical changes to the CTS requirements.</p>	SR 3.3.2.2, SR 3.3.2.3	Table 4.3 – 2 Note (2)

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

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

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A.4	<p>CTS 3.3.3.6 Table 3.3-10 lists in two columns the requirements for accident monitoring instrumentation. These columns are labeled as, "Total No. of Channels" and "Minimum Channels OPERABLE." The CTS provides Actions stated as part of the LCO. ITS 3.3.3 Table 3.3.3-1 states the requirements for PAM Instrumentation in one column labeled "Required Channels." This changes the CTS by only including the minimum channels OPERABLE column.</p> <p>The change is acceptable because the technical requirements of the CTS columns and Actions are incorporated in the ITS technical requirements. Any technical changes for the individual functions are addressed by other discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	Table 3.3.3-1	Table 3.3-10
3.3.3 A.5	<p>CTS 3.3.3.6 Table 3.3-10 lists the functions of Reactor Vessel Coolant Level Monitor, In-Core Thermocouples, and Reactor Coolant System Subcooling Margin Monitor as required accident monitoring instruments. ITS 3.3.3 Table 3.3.3-1 groups these instruments under the Inadequate Core Cooling Monitor as subsystems. This changes the CTS by the regrouping PAM functions.</p> <p>This change is acceptable because the technical requirements remain unchanged. The incorporation of the functions under the system of inadequate core cooling does not change the instrument requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	Table 3.3.3-1	Table 3.3-10
3.3.4 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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 A.2	<p>CTS 3.3.3.5 requirements for the auxiliary shutdown panel monitoring instrumentation channels state that the functions in Table 3.3-9 shall be OPERABLE. ITS LCO 3.3.4 provides a Note to the Actions that states, "Separate Condition entry is allowed for each Function." This changes the CTS by stating that separate Condition entry for each function is allowed. In addition, this changes the format for initiating Completion Time clocks.</p> <p>The purpose of the ITS Note is to state that individual functions may enter the conditional requirements separately and that each function has an independent Completion Time from each of the other instrumentation functions. This change is acceptable because it is consistent with the application of the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.3.4 ACTIONS NOTE	3.3.3.5
3.3.5 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
3.3.5 A.2	<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. CTS Action b states, "With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3." ITS LCO 3.3.5, "Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation," requires specific channels per bus for the undervoltage and degraded voltage functions to be OPERABLE. This change maintains the CTS requirements for the loss of power function in the ITS format.</p> <p>This change is acceptable because the technical requirements for the LOP EDG function are maintained with the change in format. The LOP EDG function continue to start the EDG on a loss of voltage or degraded voltage within the assumed time of the safety analyses. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.3.5	3.3.2.1 Action b

Table A – Administrative Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A.3	<p>CTS LCO 3.3.2.1 requires the ESFAS instrumentation channels to be OPERABLE in accordance with the requirements in Table 3.3-3. If a required channel becomes inoperable, the table provides the appropriate required Actions to be performed for each required function. ITS LCO 3.3.5 requires three channels per bus for the loss of voltage and degraded voltage functions to be OPERABLE. The ITS Actions provide the appropriate Conditions, Required Actions, and Completion Times for the LOP EDG function. A Note modifies the Actions that states, "Separate Condition entry is allowed for each function." This changes the CTS by specifically stating that each Condition may be entered for each function separately and follow a separate Completion Time resulting in no technical changes to CTS Action requirements.</p> <p>This change is acceptable because the requirements of the CTS are maintained in the ITS format. The functional requirements can affect each emergency bus separately, therefore the loss of voltage and degraded voltage function may be treated as independent. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.3.5 ACTIONS NOTE	Table 3.3-3
3.3.5 A.4	<p>CTS Surveillance Requirement 4.3.2.1.2 requires the ENGINEERED SAFETY FEATURES RESPONSE TIME test on each ESFAS function at least once per 18 months. The requirement states, "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that both logic trains are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3." ITS SR 3.3.5.3 requires the verification of ESFAS RESPONSE TIMES are within limits every 18 months on a STAGGERED TEST BASIS. The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS. This also changes the CTS by removing the references to logic train testing as the LOP EDG start instrumentation does not have logic trains.</p> <p>This change is acceptable because the requirements for ESFAS RESPONSE TIME testing for the ESFAS channels remain unchanged. ITS definition for STAGGERED TEST BASIS and its application in this requirement do not change the current testing frequency requirements. The ITS separates the LOP EDG start instrumentation, which does not have logic trains, from other ESFAS functions. Therefore, the CTS reference to logic trains is not required in ITS 3.3.5. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.3.5.3	4.3.2.1.2

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

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 Plans" (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  
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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 93% and SR 3.4.9.1 will require verification of the pressurizer level 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

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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" (ITS).</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
3.4.11 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 superseded 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 <math>\geq 32\%</math>. Action C addresses the condition of this 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 exceeded. 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 to 35% and ≤ 25% 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 to 35% and ≤ 25% 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
CTS 3.7.9.2 A.2	<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>	None	3.7.9.2.

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

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

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. 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

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

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

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

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

Table A – Administrative Changes  
ITS Section 3.6 - Containment Systems

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

Table A – Administrative Changes  
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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

Table A – Administrative Changes  
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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. 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. 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

Table A – Administrative Changes  
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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

Table A – Administrative Changes  
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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

Table A – Administrative Changes  
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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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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

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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" (ITS).</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 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 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
3.7.1 A.2	<p>CTS Table 3.7-1 states the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of inoperable main steam safety valves. ITS Table 3.7.1-1 states the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of OPERABLE main steam safety valves. This changes the CTS by stating the maximum allowable Power Range Neutron Flux - High setpoint as a function of the number of OPERABLE, vice inoperable, main steam safety valves.</p> <p>This change is acceptable because the maximum allowable Power Range Neutron Flux - High setpoint for a condition of the main steam safety valves has not changed. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	Table 3.7.1-1	Table 3.7-1
3.7.1 A.3	<p>CTS 3.7.1.1 states, "All main steam line code safety valves associated with each steam generators of an unisolated reactor coolant loop shall be OPERABLE with lift settings as specified in Table 3.7-2." ITS 3.7.1 states, "Five MSSVs per steam generator shall be OPERABLE." This changes the CTS by stating the number of MSSVs required to be OPERABLE per steam generator, eliminating a reference to unisolated loops, and eliminating a reference to Table 3.7-2.</p> <p>This change is acceptable because the technical requirements have not changed. Each steam generator has five MSSVs. Therefore, "All" MSSVs per steam generator and "Five" MSSVs per steam generator is equivalent. In the MODES of applicability of this specification (MODES 1, 2, and 3), all RCS loops are required to be unisolated in accordance with ITS 3.4.17. Therefore, this reference to unisolated loops is unnecessary. In the ITS, the Table equivalent to CTS Table 3.7-2 is referenced in Surveillance 3.7.1.1. SR 3.0.1 states that failure to meet a Surveillance is failure to meet the LCO. Therefore, moving the Table reference from the LCO to a Surveillance has no effect. These changes are designated as administrative because they do not result in technical changes to the specifications.</p>	3.7.1	3.7.1.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).  These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.7.2 A.2	CTS Surveillance 4.7.1.5 states that the MSTV shall be demonstrated OPERABLE by full closure within 5 seconds when tested pursuant to Specification 4.0.5. Specification 4.0.5 refers to the Inservice Test Program requirements. ITS SR 3.7.2.1 states each MSTV is verified OPERABLE with a closure time of $\leq 5$ seconds in accordance with the Inservice Testing Program. This changes the CTS by replacing a reference to CTS 4.0.5 to a reference to the Inservice Testing Program.  This change is acceptable because the requirements have not changed. Both the CTS and the ITS state that the MSTVs must be tested in accordance with the Inservice Testing Program. This change is designated as administrative as the technical requirements are not changed.	3.7.2.1	4.7.1.5
3.7.3 None	N/A	N/A	N/A
3.7.4 None	N/A	N/A	N/A
3.7.5 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).  These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 A.2	<p>CTS 4.7.1.2.a.1 requires verification that each AFW valve in the flow path not locked, sealed, or otherwise secured in position is in its correct position. ITS SR 3.7.5.1 requires verification that each AFW valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump not locked, sealed, or otherwise secured in position is in its correct position. This changes CTS 4.7.1.2.a.1 by expanding the description of the applicable flow path to specifically include the steam supply valves (MS-TV-111A and MS-TV-111B for Unit 1 and MS-TV-211A and MS-TV-211B for Unit 2) to the turbine driven AFW pump. These valves are required to be verified by CTS 4.7.1.2.a.</p> <p>This change is acceptable because CTS 4.7.1.2.a.1 is currently considered to be applicable to all valves in both water and steam flow paths. Therefore, the methodology for the surveillance requirement remains technically the same. This change is designated as administrative because it does not modify the CTS requirement.</p>	SR 3.7.5.1	4.7.1.2.a.1
3.7.5 A.3	<p>CTS LCO 3.7.1.2 states the requirements for the AFW system in terms of “pumps and associated flow paths.” CTS 3.7.1.2 Actions a, b, and c refer to the requirements in terms of “pump” or “pumps” when addressing the AFW system. ITS LCO 3.7.5 and the associated ACTIONS state the requirements in terms of “trains required to be OPERABLE”. A train consists of a pump and the associated flow path from the Emergency Condensate Storage Tank (ECST) to the associated steam generator (SG). This changes the CTS by adding the term “train” to the CTS to clarify the requirements for the AFW system.</p> <p>The change is acceptable because it maintains the current technical requirements interpretations of the CTS that pumps, referred to in the ACTIONS, are considered the pumps and associated flow paths as trains. This change is designated as administrative because CTS 3.7.1.2 and ITS 3.7.5 are equivalent requirements.</p>	3.7.5	3.7.1.2
3.7.6 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

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.6 A.2	<p>CTS 3.7.1.3 ACTIONS require if the condensate storage tank (CST) becomes inoperable, within four hours restore the Emergency Condensate Storage Tank (ECST) is restored to OPERABLE status or be in HOT SHUTDOWN within the next twelve hours. The OPERABILITY of the CST to act as a backup water supply to the AFW pumps must be demonstrated if the ECST is not returned to OPERABLE status within four hours. The ECST must be restored to OPERABLE status within seven days or the plant must be placed in HOT SHUTDOWN within the next twelve hours. In addition to these requirements, CTS surveillance 4.7.1.3.2 states the CST shall be demonstrated OPERABLE at least once per twelve hours. This requirement is accomplished by verifying the water level in the CST is sufficient to replenish the ECST to 110,000 gallons whenever the CST is the supply source for the AFW pumps. ITS 3.7.6 ACTION A requires, if the ECST is inoperable, a verification by administrative means of the OPERABILITY of the CST within four hours and once per twelve hours thereafter. Additionally, the ECST is required to be returned to OPERABLE within the next seven days. This change maintains the CTS requirements in the ITS format.</p> <p>The change is acceptable because the ITS maintains the technical requirements of the CTS ACTIONS and Surveillance. ITS ACTION A.1 and CTS ACTION b. and CTS Surveillance 4.7.1.3.2 require the verification of the CST to act as a backup to the ECST. The verification will be performed within four hours of the inoperability of the ECST and every twelve hours thereafter. ITS ACTION A.2 and CTS ACTION b. require the restoration of the ECST to OPERABLE status within seven days. The change is designated as administrative because all technical requirements of the CTS are maintained within the ITS requirements.</p>	3.7.6 Action A	3.7.1.3 Actions and 4.7.1.3.2
3.7.6 A.3	<p>CTS 3.7.1.3 states "The emergency condensate storage tank, (ECST) shall be OPERABLE with a minimum contained volume of 110,000 gallons of water." ITS LCO 3.7.6 states, "The ECST shall be OPERABLE" and SR 3.7.6.1 states, "Verify the ECST contains 110,000 gal." This changes the CTS by moving the required volume of water in the ECST from the LCO to the Surveillance.</p> <p>This change is acceptable because the requirements have not changed. ITS SR 3.0.1 states that failure to meet an SR is failure to meet the LCO. Therefore, moving the required volume from the LCO to the SR has no effect. This change is designated administrative because it does not result in a technical change to the specifications.</p>	3.7.6 and SR 3.7.6.1	3.7.1.3

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.7 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
3.7.8 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
3.7.8 A.2	<p>CTS 3.7.4.1 states, "Two service water loops (shared with Unit 2) shall be OPERABLE..." CTS 3.7.4.1 Applicability states, "Either Unit in MODES 1, 2, 3 or 4." CTS 3.7.4.1 Actions b, c, and e contain requirements to place both units in HOT STANDBY. ITS 3.7.8 does not contain references to both units. This changes CTS by deleting references to both units, and writing the requirements to apply to an individual unit in the Technical Specification. The purpose of CTS 3.7.4.1 regarding references to both units is to make it clear that OPERABILITY of the SW System affects both units.</p> <p>This change is acceptable because both units are required to follow the Technical Specifications for their respective unit, and the SW System is a shared system. If a SW component is inoperable, both units enter the CONDITIONS applicable to their respective status. Therefore, eliminating the cross-unit references is an editorial change. This change is designated</p>	3.7.8	3.7.4.1

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 A.3	<p>CTS 3.7.4.1 Action a states, The provisions of Specification 3.0.4 are not applicable once component cooling heat exchanger flows are throttled.” ITS 3.7.8 does not contain this exemption. This changes CTS by deleting a specific exemption to CTS 3.0.4. The purpose of the CTS 3.0.4 exemption is to provide an allowance to change MODES once the SW flow to the component cooling water (CC) heat exchangers has been throttled.</p> <p>This change is acceptable because ITS 3.0.4 allows MODE changes while in CONDITIONS that permit continued operation for an unlimited period of time. CTS 3.7.4.1 ACTION a requires throttling of the SW flow to the CC heat exchanger within 72 hours and then permits continued operation for an unlimited period of time. ITS 3.7.8 ACTION retains this REQUIRED ACTION and COMPLETION TIME. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.7.8	3.7.4.1 Action a
3.7.8 A.4	<p>CTS 3.7.4.1 includes a footnote, designated “*”, which allowed a temporary exemption from the SW System LCO to allow system upgrades to be completed. ITS 3.7.8 does not contain the temporary exemption. This changes CTS by deleting a temporary exemption from CTS requirements. The purpose of the temporary exemption was to allow system upgrades to be completed.</p> <p>This change is acceptable because the temporary exemption will no longer be valid at the time of ITS implementation. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	N/A	3.7.4.1 footnote “*”
3.7.8 A.5	<p>CTS 3.7.4.1 does not contain an explicit reference to isolating SW flow to individual components. ITS Surveillance 3.7.8.1 contains a Note that states, “Isolation of SW flow to individual components does not render the SW System inoperable.” This changes CTS by adding an allowance is not explicitly stated in the CTS.</p> <p>The purpose of the SW Technical Specification is to provide assurance that service water is available to the appropriate plant components. This change is acceptable because by current use and application of the CTS, isolation of a component supplied with service water does not result in the SW System being considered inoperable, but the respective component may be declared inoperable for its system. This change clarifies this application. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.7.8.1	None

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 A.6	<p>CTS 4.7.4.1.c.1 requires verification that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal. ITS SR 3.7.8.2 requires verification that each SW System automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. This changes the CTS by adding the description that the valves must be in the flow path. Other changes are described in L.1, LA.5, LA.6, LA.8, and A.7.</p> <p>The purpose of CTS 4.7.4.1.c.1 is to provide assurance that required SW valves are in their correct position. This change is acceptable because it clarifies that this requirement applies to valves in the SW flow path. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.7.8.2	4.7.4.1.c.1
3.7.8 A.7	<p>CTS 4.7.4.1.c.1 requires verification that each automatic valve servicing safety related equipment actuates to its correct position on an actual or simulated safety injection signal. CTS 4.7.4.1.c.2 requires verification that each automatic service water valve actuates to its correct position on an actual or simulated containment high-high signal. ITS SR 3.7.8.2 states, "Verify each SW System automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal." This changes the CTS by combining the requirements for testing the two separate signals into one SR.</p> <p>The purpose of the CTS 4.7.4.1.c.1 and CTS 4.7.4.1.c.2 is to provide assurance that the required SW automatic valves actuate to their correct position on their respective actuation signals. ITS SR 3.7.8.2 retains this requirement. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.7.8.2	4.7.4.1.c.1 and 4.7.4.1.c.2
3.7.8 A.8	Not Used.		
3.7.8 A.9	Not Used		

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 A.10	<p>CTS 3.7.4.1 Action a states that when one service water pump is inoperable, the SW flow to the CC heat exchangers must be throttled in accordance with approved operating procedures to ensure the remaining service water pumps are capable of providing adequate flow to the RS heat exchangers. ITS 3.7.8 The purpose of CTS 3.7.4.1 Action a is to provide assurance that component cooling heat exchanger flow is throttled within 72 hours of a SW pump inoperability so that the SW System is available when needed.</p> <p>This change is acceptable because the requirement to perform the action in accordance with approved procedures is redundant to other Specifications. ITS Section 5.4.1 requires that written procedures be established, implemented, and maintained covering activities which include the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33 Appendix A states that among the typical safety-related activities that should be covered by written procedures, list number 3, Procedures for Startup, Operation, and Shutdown of Safety-Related PWR Systems, instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for systems which include item "m", "Service Water System". CTS 3/4.7.4.1 Action a, throttling component cooling water heat exchanger flow, would be considered changing the mode of operation of the system. Therefore, deleting this statement from CTS 3.7.4.1 has no effect on plant operation. This change is designated as administrative because it does not result in technical changes to the CTS. Actions A.1 and B.1 require throttling of the SW flow to the CC heat exchangers to obtain the required RS heat exchanger flow. This changes the CTS by deleting the requirement that the throttling be performed using approved operating procedures.</p>	3.7.8	3.7.4.1 Action a
3.7.9 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

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.9 A.2	<p>CTS LCO 3.7.5.1 states that the ultimate heat sinks shall be OPERABLE and describes the Service Water Reservoir parameters that must be met. ITS LCO 3.7.9 states the UHS shall be OPERABLE, and ITS SR 3.7.9.1 and SR 3.7.9.2 contain the parameter values for the Service Water Reservoir that must be met. This changes the CTS by moving the Service Water Reservoir parameter requirements to the SRs.</p> <p>The purpose of CTS 3.7.5.1 is to provide assurance that the water in the UHS can provide required cooling in case of an event. This change is acceptable because the parameter requirements for the UHS are retained, but are moved from the LCO to the SRs. These changes are designated as administrative because they do not result in technical changes to the CTS.</p>	SR 3.7.9.1 and 3.7.9.2	3.7.5.1
3.7.10 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
3.7.10 A.2	<p>ITS SR 3.7.10.2 requires performing required MCR/ESGR EVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.7.1 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.0. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.0.</p> <p>This change is acceptable because filter testing requirements are being moved to the VFTP as part of ITS 5.0, and ITS SR 3.7.10.2 references the VFTP for performing these tests. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	5.5.10	3.7.10.2
3.7.11 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 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.12 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).  These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.7.12 A.2	ITS SR 3.7.12.3 requires performing required ECCS PREACS filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.8.1 does not include a VFTP, but the requirements that makeup the VFTP are being moved to ITS 5.0. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.0.  This change is acceptable because filter testing requirements are being moved to the VFTP as part of ITS 5.0, and ITS SR 3.7.12.2 references the VFTP for performing these tests. This change is designated as administrative because it does not result in technical changes to the CTS.	5.5.10	4.7.8.1
3.7.13 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).  These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various
3.7.14 None	N/A	N/A	N/A
3.7.15 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).  These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.	Various	Various

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.15 A.2	<p>The ITS LCO 3.7.15 Note states, "The fuel building boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.9.12, but plant practice allows opening of the boundary under administrative controls for specific purposes such as fuel building access.</p> <p>This change is acceptable because it reflects an existing plant practice necessary for the safe operation of the unit. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.7.15 LCO Note	None
3.7.15 A.3	<p>CTS 3.9.12 refers to irradiated fuel movement within the "spent fuel pit." ITS 3.7.15 refers to recently irradiated fuel movement within the fuel building. This changes the CTS by changing the reference to the location of the fuel movement.</p> <p>This change is acceptable because all the fuel movement within the fuel building occurs within the spent fuel pit, and requirements associated with the fuel movements remain the same. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.7.15	3.9.12
3.7.15 A.4	<p>CTS 3.9.12 Action c. states, "The provisions of Specification 3.0.3, 3.0.4 and 4.0.4 are not applicable." ITS 3.7.15 ACTION Note states, "LCO 3.0.3 is not applicable." ITS LCO 3.0.4, the equivalent of CTS 3.0.4, states, "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4." ITS SR 3.0.4, the equivalent of CTS 4.0.4, states, "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4." This changes CTS by deleting reference to an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.4 and ITS SR 3.0.4 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.7.15 Actions Note, LCO 3.0.4 and SR 3.0.4	3.9.12 Action c
3.7.16 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 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.17 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
3.7.18 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
3.7.19 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
3.7.19 A.2	<p>CTS 3.7.3.1 states that the CC loops are shared by the units. The Applicability applies when either unit is in MODES 1, 2, 3, or 4. Actions a, b, and c contain requirements on both units. ITS 3.7.19 is written to apply to a single unit. The change to the LCO is described in DOC LA.1. The change to the Applicability and the Actions are administrative changes necessary to be consistent with the change to the LCO. This presentation is also consistent with the presentation used in ITS LCO 3.7.8, Service Water System, which is a similar shared system.</p> <p>This change is acceptable because both units are required to follow the Technical Specifications and CC is a shared system. If a required CC subsystem is inoperable, both units are affected. The CC applies to each unit that is in the Applicability, so if either unit is in MODE 1, 2, 3, or 4, the CC System is required to be OPERABLE. If one or more CC subsystems are inoperable, ACTIONS must be entered on both units if both are in the Applicable MODES. Therefore, eliminating the cross-unit references is an administrative change. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	LCO 3.7.19	3.7.3.1, Actions a, b, and c

Table A – Administrative Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.19 A.3	<p>CTS 3.7.3.1 includes footnote “***” which allows a temporary exception to the CC LCO for service water system upgrades. ITS 3.7.19 does not contain that temporary exception.</p> <p>This change is acceptable because the temporary exception was only allowed to be used two times (once per SW loop). The temporary exception has been used and is no longer valid. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.7.3.1, footnote ***
3.7.19 A.4	<p>CTS 3.7.3.1 Actions refer to CTS MODE names, "Hot Standby," "Hot Shutdown," and "Cold Shutdown." ITS 3.7.19 uses the corresponding ITS MODE numbers, "MODE 3," "MODE 4," and "MODE 5." This changes the CTS by utilizing MODE numbers instead of MODE names. Any technical changes associated with the differences in CTS MODES and ITS MODES are discussed in Chapter 1.0.</p> <p>This change is acceptable because the ITS uses MODE numbers instead of MODE names. Any technical changes associated with the differences in CTS MODES and ITS MODES are discussed in Chapter 1.0. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	ACTIONS A, B, C, and D	3.7.3.1, Actions a, b, and c

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.2	<p>CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system requirements consist of the above requirements for either unit operating in MODES 1, 2, 3, or 4. CTS LCO 3.7.3.1, Component Cooling Water System – Operating, requires three component cooling water subsystems (shared with the other unit) shall be OPERABLE. This requirement must be met with either unit is in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW and CC pumps and the fans from the MCR/ESGR and Auxiliary Building exhaust ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1 Action J states, “Two required LCO 3.8.1.c EDGs inoperable, declare shared components inoperable immediately.” This changes the CTS by specifically stating the requirement in the ITS Action J.</p> <p>The purpose of the proposed change is to structure the existing electrical requirements for the shared components in the ITS by placing electrical requirements in ITS section 3.8. This change is acceptable because the AC sources requirements for the SW, CC, MCR/ESGR Emergency Habitability System, and ECCS Pump Room Exhaust Cleanup System functions are contained in the electrical requirement section of the unit’s Technical Specifications. The additional requirements of the fans in the ventilation specifications are addressed by more restrictive discussion of changes to the CTS requirements. The additional electrical requirements are classified as administrative because of the systems may require electrical power from both units in order to satisfy the individual safety function. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, Required Action J	CTS LCO 3.7.4.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.3	<p>CTS 3.8.1.1 Actions b.1 and b.2 provide an allowance to have an EDG inoperable for up to 14 days. These Actions require the OPERABILITY of the alternate AC (AAC) diesel generator (DG) and the opposite unit's EDGs at the time of the initial inoperability of the EDG and throughout the 14 day allowed outage time. If either the AAC DG or either of the opposite unit's EDGs become inoperable when relied on for this action, a seventy two-hour limit is imposed for the EDG. If the AAC DG and both of the opposite unit's EDGs are returned to an OPERABLE status within the 72-hour limit, the EDG may continue in the 14 day allowed outage. ITS Action B provides the necessary Required Actions for returning the inoperable EDG to OPERABLE status within 14 days. ITS Action C requires with an EDG inoperable and one or more of the opposite unit's EDGs or the AAC DG inoperable, both of the opposite unit's EDGs and the AAC DG must be restored to OPERABLE status within 72 hours or restore the ITS 3.8.1.b EDG to OPERABLE status. A Note to ITS Condition C states that the condition is only applicable if either the AAC DG or the opposite unit EDG(s) is inoperable.</p> <p>This change is acceptable because no technical requirements are added to or deleted from the current requirements. The change in format of the CTS, with the conversion to the ITS, maintains all technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, ACTION B and C	3.8.1.1, Actions b.1 and b.2
3.8.1 A.4	<p>CTS 3.8.1.1 Action c applies, "With one offsite circuit and one EDG inoperable." In this condition an emergency bus may be de-energized. CTS LCO 3.8.2.1 provides an Action for an emergency bus that is de-energized. A Note to ITS 3.8.1 Action H in the Required Actions column states, "Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution System - Operating," when Condition H is entered with no AC power source to any train." The addition of the Note does not alter the technical requirements of the CTS and acts as only a reminder to enter appropriate Actions.</p> <p>This change is acceptable because no changes are made to CTS requirements. The change in format from the CTS to the ITS maintains all technical requirements. The addition of the Note only acts as a reminder to enter all appropriate Actions if any emergency bus becomes de-energized. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1 Action H Note	3.8.1.1, Action c, LCO 3.8.2.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.5	<p>CTS 3.8.1.1 Action c for an inoperable offsite circuit and EDG requires the restoration of one of the sources within 12 hours and states “demonstrate the OPERABILITY of the remaining offsite A.C. power sources by performing Surveillance Requirement 4.8.1.1.a within one hour and at least once per 8 hours thereafter.” That is, when the EDG is declared inoperable and Action b is entered and either earlier or later an offsite circuit is declared inoperable, Action a. and Action c. are also required to be entered. The only mechanism for entering Action c is to be in Action a and Action b concurrently. ITS 3.8.1 Action H states that when one offsite circuit and one EDG are inoperable, one source must be returned to OPERABLE status within twelve hours. The only mechanism to enter this Condition is to have entered ITS 3.8.1 Actions A and B concurrently. ITS Required Action B.1 states that SR 3.8.1.1 will be performed for offsite circuit(s). It also requires in Required Action B.3, an evaluation of the OPERABLE EDG is made. With the requirements of the CTS stated in this manner, CTS 3.8.1.1 Action c repeated the requirements of Action b, for the performance of CTS requirement 4.8.1.1.a and the evaluation of the OPERABLE EDG. This requirement is redundant and therefore is eliminated.</p> <p>This change is acceptable because the technical requirements remain the same. If an offsite circuit and an EDG become inoperable at the same time, the requirement to perform a breaker and power availability check on the OPERABLE offsite circuit and an evaluation or start on the OPERABLE EDG, continue to be required. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, Action H	3.8.1.1, Action c

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.6	<p>CTS 3.8.1.1, Action d, applies when two offsite circuits are inoperable and requires one offsite circuit be restored to OPERABLE status within twenty-four hours, or be in at least HOT STANDBY within the next 6 hours. The requirement also states, "Following restoration of one offsite source, follow Action Statement a with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable offsite A.C. circuit." CTS Action a states, "Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next six hours and COLD SHUTDOWN within the following 30 hours." If both inoperable offsite circuits are not restored when the unit reaches HOT STANDBY, the required actions do not specify any further actions. With the unit in HOT STANDBY and no offsite circuits, LCO 3.0.3 must be entered. This requires the unit to be placed in HOT SHUTDOWN in 6 hours and COLD SHUTDOWN within the next 24 hours. ITS Actions A and G are constructed to track the inoperability of one and two offsite circuits. ITS Action A requires an inoperable offsite circuit be restored to OPERABLE status within 72 hours. ITS Action G must be entered when two circuits are concurrently inoperable and allows 24 hours to restore one offsite circuit to OPERABLE status. If ITS Actions A or G are not met within either allowed Completion Times, ITS Action K must be entered and requires the unit to be placed in MODE 3 within 6 hours and MODE 5 within 36 hours. This change maintains the technical requirements of the CTS requirements in the ITS format.</p> <p>This change is acceptable because the technical requirements remain the same. The ITS requires multiple condition entry. Therefore, ITS Actions A and G would both be entered if two offsite circuits were inoperable and Action A would be followed until both offsite circuits were restored to OPERABLE status. This has the same effect as the CTS requirements. Therefore, the deletion of the wording in CTS 3.8.1.1 Action d does not modify the technical requirements of the CTS and the unit would be required to be in MODE 5 (COLD SHUTDOWN) within 30 hours after reducing to MODE 3 (HOT STANDBY). This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, ACTIONS A and G	3.8.1.1, Actions a and d

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.7	<p>CTS 3.8.1.1 Action e applies when two EDGs are inoperable and requires one EDG to be restored to OPERABLE status within two hours. This requirement also states, “demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter.” In addition the CTS requires, “Following restoration of one EDG, follow Action Statement b. with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable EDG.” ITS Actions B and I are constructed to track the inoperability of one and two EDGs. ITS Action B requires that each inoperable EDG be tracked and ITS Action I applies when both EDGs are inoperable. Therefore, ITS Action B must be entered if one or two EDGs are inoperable and requires the performance of SR 3.8.1.1 within one hour and every eight hours thereafter. This maintains the CTS requirement to demonstrate the OPERABILITY of two offsite AC circuits within an hour and every 8 hours thereafter when one or two EDGs are inoperable.</p> <p>This change is acceptable because the technical requirements remain the same. The ITS requires multiple condition entry. Therefore, ITS Actions B and I would both be entered if two EDGs were inoperable and Action B would be followed until both EDGs were restored to OPERABLE status. This has the same effect as the CTS requirements. Therefore, the deletion of the wording in CTS 3.8.1.1 Action e does not modify the technical requirements of the CTS and the unit would be required to be in MODE 5 (COLD SHUTDOWN) within 30 hours after reducing to MODE 3 (HOT STANDBY). This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, ACTIONS B and I	3.8.1.1, Actions b and e
3.8.1 A.8	<p>CTS LCO 3.8.1.1 does not contain an Action for more than two sources of either offsite circuits or EDGs inoperable. Having more than two sources inoperable requires entering CTS LCO 3.0.3. ITS 3.8.1, Action M, requires entering LCO 3.0.3 immediately if three or more AC sources are inoperable.</p> <p>The change is acceptable because the CTS Actions for more than two sources inoperable are the same as the ITS Actions. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.1, ACTION M	LCO 3.8.1.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.9	<p>CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system specification applies when either unit is operating in MODES 1, 2, 3, or 4. CTS LCO 3.7.3.1, Component Cooling Water System – Operating, requires three component cooling water subsystems (shared with the other unit) shall be OPERABLE. This requirement must be met with either unit is in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW and CC pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1, “AC Sources,” part c states, “One qualified circuit between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System and one EDG capable of supplying the onsite Class 1E AC power distribution subsystem on the other unit for each required shared component; and.” This change maintains the CTS requirements for AC sources in the ITS format.</p> <p>The purpose of the proposed change is to structure the existing electrical requirements for the shared components in the ITS by placing electrical requirements in ITS Section 3.8. This change is acceptable because the AC sources requirements for the SW, CC, MCR/ESGR Emergency Habitability System, and ECCS Pump Room Exhaust Cleanup System functions are moved to the electrical requirement section of the unit’s Technical Specifications. The additional requirements of the fans in the ventilation specifications are addressed by more restrictive discussion of changes to the CTS requirements. The movement of the electrical requirements is classified as administrative because of the systems may require electrical power from both units in order to satisfy the individual safety function. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.7.10, LCO 3.7.12, LCO 3.7.19 LCO 3.8.1.c	LCO 3.7.4.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.10	<p>CTS SR 4.8.1.1.2.a.4 states “Verifying the EDG can start ** and voltage and frequency at <math>4160 \pm 420</math> volts and <math>60 \pm 0.5</math> Hz.” The note ** states, “This test shall be conducted in accordance with the manufacturer’s recommendations regarding engine prelude and warmup procedures, and as applicable regarding loading recommendations.” ITS SR 3.8.1.2 states, “Verify each EDG starts from standby conditions and achieves steady state voltage of <math>\geq 3740</math> V to <math>\leq 4580</math> V, and the frequency from <math>\geq 59.5</math> Hz to <math>\leq 60.5</math> Hz.” Two Notes modify SR 3.8.1.2. Note 1 states, “All EDG starts may be preceded by an engine prelude period and followed by a warm up period prior to loading.” Note 2 states, “A modified EDG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. When a modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.7 must be met.” This changes the CTS by specifically stating the requirements and allowances in the ITS format.</p> <p>This change is acceptable because the requirements of the CTS are maintained in the ITS requirements. ITS Note 1 maintains the allowances provided by the CTS note for a prelude and warmup period prior to loading. ITS Note 2 establishes that ITS SR 3.8.1.2 may involve idling and gradual acceleration to synchronous speed and SR 3.8.1.2 may be credited when performing SR 3.8.1.7. This is acceptable because the CTS note allows loading in accordance with loading recommendations and SR 3.8.1.7 meets or exceeds the technical requirements of SR 3.8.1.2. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.2	4.8.1.1.2.a.4
3.8.1 A.11	<p>CTS SR 4.8.1.1.2.a.4 states after a successful start of the EDG, “Subsequently, verifying the generator is synchronized, gradually loaded ** to an indicated 2500 - 2600 kW *** and operates for at least 60 minutes.” CTS notes ** and *** allow the test to be conducted in accordance with manufacturer’s recommendations regarding engine warmup and loading. These notes also allow momentary variations in loads, due to changing in bus loads, to not invalidate the test. ITS SR 3.8.1.3 states, “Verify each EDG is synchronized and loaded and operates for <math>\geq 60</math> minutes at a load <math>\geq 2500</math> kW and <math>\leq 2600</math> kW.” Four Notes modify the SR. Notes 1 and 2 allow EDG loading as recommended by the manufacturer and momentary transients outside the load range to not invalidate the test. Notes 3 and 4 are addressed by DOC M.6.</p> <p>This change is acceptable because Notes 1 and 2 in ITS SR maintain the allowances provided by the CTS notes. The changes to the notes are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.3	4.8.1.1.2.a.4
3.8.1 A.12	Not used.	N/A	N/A

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.13	<p>CTS requirement 4.8.1.1.2.c states that the EDG shall be started at least once per 184 days and manually synchronized to its appropriate emergency bus, gradually loaded** to an indicated 2500 to 2600 kW***, and operated for at least 60 minutes. ITS SR 3.8.1.7 requires the start of the EDG every 184 days. ITS SRs 3.8.1.3 requires the synchronization and loading of the EDG from 2500 to 2600 kW for a period of 60 minutes. SR 3.8.1.3 contains a Note, which states that the requirement shall be preceded by and immediately follows without shutdown a successful performance of SR 3.8.1.2 or SR 3.8.1.7. This changes the CTS by eliminating the duplicated requirements of 4.8.1.1.2.c (ITS SR 3.8.1.7), which are now contained in ITS SR 3.8.1.3 (CTS SR 4.8.1.1.2.a.4).</p> <p>This change is acceptable because the division of the current requirement 4.8.1.1.2.c into ITS SR 3.8.1.2 or SR 3.8.1.7 and 3.8.1.3 maintains the requirements of starting, synchronizing with the emergency bus, and fully loading the EDG for 60 minutes. Additional changes to requirement 4.8.1.1.2.c are discussed in other discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.7, SR 3.8.1.3 Note	4.8.1.1.2.c
3.8.1 A.14	<p>CTS requirements 4.8.1.1.2.d.2, d.3, d.5, and d.8 require the testing of the EDGs, at least once per 18 months “during shutdown.” ITS SRs 3.8.1.10, 3.8.1.15, 3.8.1.16 and 3.8.1.17 incorporate this requirement and state it as a Note. The Note states, “This Surveillance shall not be performed in MODES 1, 2, 3, or 4.” This changes the CTS by specifically stating the applicable MODES of operation that the SRs may be performed.</p> <p>This change is acceptable because the CTS requirements for testing the AC sources do not specifically state the MODES in which the tests must be performed, but simply state “during shutdown.” The ITS SRs’ Note provides specific MODES in which test is not to be performed. With the unit in MODE 5, 6, or defueled (no MODE), the performance of these required tests can be conducted with minimum effects on the electrical system for the EDG that is not required to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.10, SR 3.8.1.15, SR 3.8.1.16 and SR3.8.1.17	4.8.1.1.2.d.2, d.3, d.5, and d.8

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.15	<p>CTS SR 4.8.1.1.2.a.6 states, in part, that the EDG shall be operated to an indicated load of 2500 - 2600 kW and is modified by a footnote labeled ***. CTS note *** allows momentary variations in loads, due to changing in bus loads, to not invalidate the test. ITS SR 3.8.1.13 states in Note 1, "Momentary transients outside the load range to not invalidate the test." The portion of the Note that addresses the power factor limitation is discussed later in these discussions of changes.</p> <p>This change is acceptable because this portion of Note 1 in ITS SR maintains the allowance provided by the CTS note. The changes to the note are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.13 Note 1	4.8.1.1.2.a.6
3.8.1 A.16	<p>CTS SR 4.8.1.1.2.a.10 states, in part, that the EDG shall be operated to an indicated load of 2500 - 2600 kW *** for 2 hours, or until operating temperatures have stabilized, then the EDG must be shutdown. Within 5 minutes of shutting down, verify the EDG can start and achieve the required voltage and frequency within 10 seconds. The CTS footnote *** allows momentary variations in loads, due to changes in bus loads to not invalidate the test. ITS SR 3.8.1.14 states in Note 1, "This Surveillance shall be performed within 5 minutes of shutting down the EDG after the EDG has operated <math>\geq</math> 2 hours loaded <math>\geq</math> 2500 kW and <math>\leq</math> 2600 kW or after operating temperatures have stabilized." The Note 1 also allows, "Momentary transients outside the load range to not invalidate the test."</p> <p>This change is acceptable because Note 1 of the ITS SR maintains the requirement provided in the CTS. The changes to the requirements and note are editorial and conform to the format of the ISTS. This change is designated as administrative because it does not result in a technical change to the CTS</p>	SR 3.8.1.14, Note 1	4.8.1.1.2.a.10, footnote ***
3.8.1 A.17	<p>Unit 1 CTS Surveillance Requirement 4.8.1.1.1.b states that the independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be demonstrated OPERABLE at least once per 18 months during shutdown by manually transferring the onsite Class 1E power supply from the normal circuit to the alternate circuit. This SR for unit 2 has been eliminated by DOC L.7. ITS SR 3.8.1.8 states, "Verify manual transfer of AC power sources from the normal offsite circuit to the alternate required offsite circuit. The SR is modified by a Note that states, "This Surveillance is only applicable to Unit 1." This changes the CTS by specifically stating that the SR is only to Unit 1.</p> <p>This change is acceptable because SR 4.8.1.1.1.b has been deleted for Unit 2. The purpose of the note is to limit the SR to be required for Unit 1. This change is designated as administrative because the addition of the Note does not result in a technical change to the Unit 1 CTS.</p>	SR 3.8.1.8, Note	Unit 1 4.8.1.1.1.b

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.18	<p>CTS Surveillance Requirement 4.8.1.1.2.d.5.c requires the verification that all EDG trips, except engine overspeed, generator differential and breaker overcurrent are automatically bypassed on an emergency start. The output breaker overcurrent for the EDG is not a trip for the diesel and should not be included in the exception. ITS SR 3.8.1.12 requires the verification of each EDG's automatic trips are bypassed on an actual or simulated automatic start signal except for engine overspeed and generator differential current. This changes the CTS by eliminating the EDG output breaker overcurrent from the list of EDG trips.</p> <p>This change is acceptable because the output breaker overcurrent does not provide a trip of the EDG. With the deletion of the output breaker overcurrent, no technical requirement is added or deleted with the conversion of the CTS requirements to the ITS requirements. The output breaker overcurrent should not have been included in the CTS requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.12	4.8.1.1.2.d.5.c

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.19	<p>CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path.” Each unit’s service water system specification applies when either unit is operating in MODES 1, 2, 3, or 4. CTS LCO 3.7.3.1, Component Cooling Water System – Operating, requires three component cooling water subsystems (shared with the other unit) shall be OPERABLE. This requirement must be met with either unit is in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW and CC pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS 3.8.1 Action F states if the required offsite circuit and EDG on the other unit that support a required shared components become inoperable, the supported shared components will be declared inoperable immediately. The differences between the requirements for the shared systems of the CTS and the ITS are addressed in ITS LCOs 3.7.8, 3.7.10, 3.7.12, and 3.7.19. This change maintains the CTS requirements in the ITS format.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS. If a shared components is required to be OPERABLE for this unit and the pump or fan is powered from the other unit’s electrical system, the loss of the normal and emergency AC source would required the pump or fan to be declared inoperable and appropriate Action for the affected system to be entered. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.7.10, LCO 3.7.12 LCO 3.7.19 3.8.1, Action F	LCO 3.7.4.1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.20	<p>CTS SR 4.8.1.1.2.d.5.c states that all non-critical EDG trips will be bypassed on a loss of voltage on the emergency bus and/or a safety injection actuation signal. The non-critical trips do not include engine overspeed, generator differential, and EDG output breaker overcurrent. The output breaker overcurrent is addressed in DOC A.18. ITS 3.8.1.12 states, "Verify each EDG's automatic trip are bypassed on actual or simulated automatic start signal except engine overspeed and generator differential current. This changes the CTS specifically stating that the non-critical EDG trips are bypassed on any automatic start signal. The specific automatic start signal is moved to the ITS Bases by DOC LA.1.</p> <p>This change is acceptable because the technical requirements remain unchanged. The EDGs will continue to have their non-critical trips verified to be bypassed on a start from a signal from either an ESF or loss of voltage signal. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.1.12	4.8.1.1.2.d.5.c
3.8.1 A.21	Not used.	N/A	N/A
3.8.1 A.22	<p>CTS LCO 3.8.1.1 requires two EDGs to be OPERABLE. ITS LCO 3.8.1 states two EDGs capable of supplying the onsite Class 1E power distribution subsystem(s) shall be OPERABLE. This changes the CTS by stating the requirement that the EDG must be capable of supplying the onsite Class 1E power distribution subsystem.</p> <p>This change is acceptable because the EDGs may only be connected to the onsite Class 1E subsystems. The change in wording does not modify the technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.1	LCO 3.8.1.1
3.8.2 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

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 A.2	<p>CTS LCO 3.8.1.2 Action a. states with required AC sources inoperable immediately suspend operations involving CORE ALTERATIONS, positive reactivity additions, movement of irradiated fuel assemblies, and movement of loads over irradiated fuel assemblies until the required AC sources are restored to OPERABLE status. ITS 3.8.2 Action B adds a Note to these requirements that states, "Enter applicable Conditions and Required Actions of LCO 3.8.10, with one required train de-energized as a result of Condition B." Other changes to CTS ACTION are addressed in by additional discussion of changes in this section. The purpose of the Note is to remind the user that if an emergency bus becomes de-energized with the loss of the offsite circuit and the required EDG, ITS LCO 3.8.10 would be entered for specific Required Actions.</p> <p>The change is acceptable because the requirements of the CTS would require an evaluation of potential Actions for inoperable buses and equipment. The change is designated as administrative because the Note only acts as a reminder to enter all necessary specifications for a specific condition and does not change the technical requirements of the CTS.</p>	3.8.2, ACTION B Note	3.8.1.2, Action a
3.8.3 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
3.8.3 A.2	<p>CTS LCOs 3.8.1.1 and 3.8.1.2 state the requirements for the electrical power sources - operating and shutdown. These requirements are used to form the LCO and Applicability for the diesel fuel oil and starting air systems. ITS LCO 3.8.3, "Diesel Fuel Oil and Starting Air," states "The stored diesel fuel oil and starting air subsystems shall be within limits for each required emergency diesel generator (EDG)." The Applicability for these requirements are, "When associated EDG is required to be OPERABLE. The addition of the starting air requirements is addressed in DOC M.1. This changes the CTS by stating the LCO and Applicability requirements for the diesel fuel oil in the ITS format.</p> <p>This change is acceptable because the current requirements are translated into ITS form with no technical changes. The fuel oil is a support system for each EDG that is required to maintain the EDG's OPERABILITY. The CTS and ITS maintain this relationship between the EDGs and the fuel oil system without any changes in the technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.3, 3.8.3 Applicability	LCO 3.8.1.1, LCO 3.8.1.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A.3	<p>CTS LCO 3.8.1.1 states the requirements for the diesel fuel oil in the LCO, Action, and Surveillance Requirements for the EDGs when the unit is operating. CTS LCO 3.8.1.2 lists the requirements for diesel fuel oil in the LCO, Action, and Surveillance Requirements when the unit is in a shutdown condition. Both CTS 3.8.1.1 and 3.8.1.2 provide the requirements on the fuel oil system needed to support the OPERABILITY of the associated EDG. ITS 3.8.3 Actions are provided with a Note that states, "Separate Condition entry is allowed for each EDG." The addition of the Note provides clarity to the CTS by specifically stating that a separate entry is allowed for each EDG.</p> <p>This change is acceptable because each EDG is provided with an independent source for starting air. Each EDG requires an independent fuel oil supply by separate transfer lead and backup pumps and day tank. The requirements of the CTS deal only the fuel oil requirements and separate condition entry is allowed by the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.3 ACTIONS Note	LCO 3.8.1.1, LCO 3.8.1.2
3.8.3 A.4	<p>CTS 3.8.1.1 Actions do not specifically state Required Actions for an EDG if sufficient fuel oil is not available. ITS Condition F states, "Required Action and associated Completion Time not met, or one or more EDGs diesel fuel oil or starting air systems not within limits for reasons other than Condition A, B, C, D, or E, declare associated EDG inoperable immediately." Starting air requirements are addressed in DOC M.1. This changes the CTS by specifically stating that if Actions are not met, the associated EDG would be declared inoperable.</p> <p>This change is acceptable because the CTS requirements are structured as a support system for EDGs OPERABILITY. Specifically stating the requirement to declare the EDG(s) inoperable does not change the technical intent of the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.3, Condition F	3.8.1.1 Actions

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A.5	<p>CTS Surveillance 4.8.1.1.2 specifies that each EDG shall be tested in accordance with CTS Table 4.8.2. This requirement is modified in ITS Section 3.8.1 and specifies the frequency of testing an EDG as 31 days. CTS requirement 4.8.1.1.2.a.2 requires the verification of fuel oil tank level to support the OPERABILITY of the EDG. ITS SR 3.8.3.1 requires verification of fuel oil volume every 31 days. This changes the CTS by specifically stating the frequency for verification of fuel oil tank level as 31 days.</p> <p>This change is acceptable because the requirements in LCO 3.8.1 specify the testing frequency of the EDG. The fuel oil level is verified to ensure OPERABILITY of the EDG. Therefore, the frequency of the testing is dependent on the testing requirements of the EDG. This change reflects the requirements of the CTS in the ITS format. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.3.1	4.8.1.1.2, 4.8.1.1.2.a.2
3.8.3 A.6	<p>CTS LCO 3.8.1.1.b.2 states that the fuel storage system consists of two under ground storage tanks each containing a minimum of 45,000 gallons of fuel and this is a shared system between units. ITS Condition B states, "One or more EDGs with fuel oil inventory &lt; 90,000 gallons . . .," and SR 3.8.3.1 requires the verification of "fuel oil inventory of ≥ 90,000 gal of fuel." This changes the CTS by stating the total inventory requirement of fuel oil instead of the individual fuel oil tank requirement.</p> <p>The purpose of CTS 3.8.1.1.b.2 is to require sufficient fuel oil inventory for two EDGs to operate at full load for 7 days as required to support the accident analysis. This change is acceptable because the total inventory requirement for the EDG fuel oil system of 90,000 gallons remain the same. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.8.3 Condition B	3.8.1.1.b.2
3.8.4 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 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A.2	<p>CTS Surveillance Requirements 4.8.2.3.2 c.1 for the station batteries and 4.8.1.1.3 c.1 for the EDG batteries require, at least once per 18 months, the verification that battery cells, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration. ITS SR 3.8.4.3 requires the verification of station and EDG battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance. This changes the CTS requirements by adding the clarification, “that could degrade battery performance.”</p> <p>This change is acceptable because the intent of the CTS is maintained in the ITS requirements. The ITS adds a clarifying statement that expresses the CTS requirements with no modifications to technical requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.4.3	4.8.2.3.2.c.1 4.8.1.1.3.c.1
3.8.4 A.3	<p>CTS 4.8.2.3.2 e and f Surveillance Requirements for the station batteries, and 4.8.1.1.3 d and e for the EDG batteries, both require a test to verify battery capacity. Each battery is tested every 60 months to ensure capacity is at least 80% of the manufacturer’s rating during a performance discharge test. A discharge test is required every 18 months if the battery shows signs of degradation, or has reached 85% of its service life. ITS SR 3.8.4.9 requires the verification of the station and EDG battery capacity <math>\geq</math> 80% of the manufacturer’s rating when subjected to a performance discharge test or a modified performance discharge test. The allowance of the modified performance discharge test is addressed in a less restrictive change L.1. The Frequency requirements for the SR are 60 and 18 months when the battery shows degradation or has reached 85% of expected life. This change retains the CTS requirements for the batteries by expressing the testing requirements in a conditional Frequency.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS requirements. The re-arrangement of the SR in the ITS format does not add or delete any required testing of the CTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	SR 3.8.4.9	4.8.2.3.2.e, 4.8.2.3.2.f, 4.8.1.1.3.d, 4.8.1.1.3.e

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A.4	<p>CTS Surveillance Requirement 4.8.1.1.3 provides the testing requirements and acceptance criteria for determining EDG DC system OPERABILITY. These requirements relate to the OPERABILITY of the associated EDG in LCO 3.8.1.1. ITS LCO 3.8.4 is constructed to include the LCO, Condition, and SRs for the EDG's DC system. This change retains the CTS requirements for the EDG's DC system and ensures the EDG's OPERABILITY requirements are maintained.</p> <p>This change is acceptable because the CTS requirements for the EDG's DC requirements are maintained in the ITS format without any technical requirements being modified. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.4	4.8.1.1.3
3.8.4 A.5	<p>CTS LCO 3.8.2.3 is modified with the requirement that the DC electrical power subsystem on the other unit that supplies the DC electrical power for each required Service Water (SW) pump must be OPERABLE for this unit. This requirement is derived from the CTS LCO 3.7.4.1, Service Water System – Operating. ITS LCO 3.8.4 states that the following DC electrical power subsystems shall be OPERABLE, including, "One DC electrical power subsystem on the other unit for each required shared component." This maintains the CTS requirements for the shared components, powered from the other unit that are required by this unit.</p> <p>This change is acceptable because the electrical requirement contained in CTS LCO 3.7.4.1 is moved into the appropriate LCO of the ITS without technical change. The required DC subsystems of the other unit must be required to be OPERABLE for this unit in order to maintain the required shared components OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.4	LCO 3.8.2.3, LCO 3.7.4.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A.6	<p>CTS LCO 3.8.2.3 Actions are modified with the requirement that the DC electrical power subsystem on the other unit that supplies the DC electrical power for each required shared components that must be OPERABLE for this unit. This requirement is derived from the CTS LCO 3.7.4.1, Service Water System – Operating. ITS LCO 3.8.4 Condition D states, “one or more required LCO 3.8.4.c DC electrical power subsystem(s) inoperable, declare associated shared component(s) inoperable, immediately.” A Note that states “Separate Condition entry is allowed for each DC subsystem” modifies condition D. This maintains the CTS requirements for the shared components, powered from the other unit that are required by this unit.</p> <p>This change is acceptable because the electrical requirement contained in CTS LCO 3.7.4.1 are moved into the appropriate Condition of the ITS without technical change. If the required DC subsystems of the other unit become inoperable for the required shared components, then the shared components will be declared inoperable immediately. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.4, Condition D	LCO 3.8.2.3
3.8.5 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
3.8.5 A.2	<p>CTS 4.8.1.2 requires the performance of Surveillance Requirement 4.8.1.1.3 for a required EDG. ITS LCO 3.8.5, “DC Sources – Shutdown,” states, “EDG DC system shall be OPERABLE for the EDG required by LCO 3.8.2, ‘AC Sources – Shutdown.’” ITS Action B states that with the required EDG DC system inoperable, enter the applicable Conditions and Required Actions for the associated EDG immediately. This changes the CTS requirements by specifying the EDG DC subsystems shall be OPERABLE and providing Required Actions for an inoperable EDG DC subsystem.</p> <p>This change is acceptable because the CTS requirements for the EDGs’ DC systems are maintained in the conversion to the ITS requirements. The DC system is required when the supported EDG is required to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.5, Action B	4.8.1.2, 4.8.1.1.3

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 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
3.8.6 A.2	<p>CTS testing requirements for station and EDG batteries are contained in Surveillance Requirements 4.8.2.3.2 and 4.8.1.1.3. ITS LCO 3.8.6 is structured to implement the CTS SRs in a standard format for the battery cell parameters. The LCO states, "Battery cell parameters for station Train H and Train J, and EDG batteries shall be within limits." The Applicability for the LCO is stated as, "When associated DC electrical power subsystems or EDG DC systems are required to be OPERABLE." A Note is added for the proposed Actions that states, "Separate Condition entry is allowed for each battery." This changes the CTS by specifying an LCO, Applicability, and Note for the Actions that do not currently exist.</p> <p>The change is acceptable because these requirements continue to ensure the OPERABILITY for the station and EDG batteries. The specific addition of the ITS LCO, Applicability, and Note does not change any technical requirement of the CTS requirements, but provides a clarifying statement for the current requirements. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.6, 3.8.6 Applicability, ACTIONS Note	4.8.2.3.2, 4.8.1.1.3

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 A.3	<p>CTS 4.8.2.3.2 and 4.8.1.1.3 Surveillance Requirements provide testing requirements for the station and EDG batteries. The requirements include the Category A and B limits of Table 4.8-3 for the station and EDG batteries, and electrolyte temperature for station batteries. CTS Table 4.8-3 lists the allowable value limit for battery cell parameters under Category B limits. ITS LCO 3.8.6 Action B lists three Conditions for the associated batteries. The first Condition is Required Action and associated Completion Time of Condition A not met. Condition A specifies, for station and EDG batteries cell parameters not within Category A or B limits, specific Required Actions to be performed to ensure OPERABILITY of the battery. The second Condition of Action B states one or more station batteries with average electrolyte temperature for the representative cells &lt; 60 °F. The third Condition states one or more station or EDG batteries with one or more battery cell parameters not within Table 3.8.6-1 Category C values. The associated battery is declared inoperable immediately if any part of the Condition B is met. This changes the CTS by specifying specific Conditions for ITS Action B.</p> <p>The change is acceptable because these requirements ensure the station and EDG batteries are verified within specified parameters or the battery is declared inoperable. This is the intent of the CTS requirements on the battery cell parameters listed in a Note to Table 4.8-3. Other changes to the battery cell parameters are addressed in more and less restrictive changes in these discussion of changes. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.6, ACTION B	4.8.2.3.2, 4.8.1.1.3, Table 4.8-3
3.8.6 A.4	<p>CTS LCO 3.7.4.1 requires the normal and emergency power supplies to be OPERABLE for the required Service Water pumps. Requirements for Main Control Room and Emergency Switchgear Room fans and Auxiliary Building central exhaust fans may require electrical power from the other unit. ITS LCO 3.8.6 is modified to include the Station and EDG batteries on the other unit that are required to support shared components that are powered for the other unit. This change maintains the CTS requirements in the ITS format.</p> <p>The change is acceptable because these requirements ensure the station and EDG batteries that are needed to support shared components on the other unit, needed for this unit, are maintained OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.6	LCO 3.7.4.1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 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
3.8.7 A.2	<p>CTS 3.8.2.1 for the Onsite Power Distribution Systems lists A.C. Distribution – Operating requirements. CTS LCO 3.8.2.1 states, "The following A. C. electrical busses shall be OPERABLE." The requirement specifies 4 120-volt AC electrical buses are energized from their associated inverter. The inverter receives its power from the associated DC bus. ITS LCO 3.8.7, "Inverters – Operating" requires the H and J Train inverters to be OPERABLE. This changes the CTS by dividing the onsite AC power system into sources and distribution systems.</p> <p>This change is acceptable because the ITS divides the requirements for the electrical sources from the electrical power distribution systems but does not change the technical requirements. The inverters provide the regulated 120-volt AC electrical source(s) for the 120 VAC distribution systems. The 120 VAC distribution systems are addressed by ITS LCO 3.8.9, "Distribution Systems – Operating." This change retains the technical requirements for the inverters. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.7	LCO 3.8.2.1
3.8.7 A.3	<p>CTS 3.8.2.1 Action c states that with one AC vital bus not energized from its associated inverter re-energize the inverter within 24 hours. ITS LCO 3.8.7 Action A states that with one inverter inoperable, restore the inverter to OPERABLE status in 24 hours. This changes the CTS by specifying the 120 VAC inverter as the electrical power source for the 120-volt AC bus.</p> <p>This change is acceptable because the ITS divides the requirements for the electrical sources from the electrical power distribution systems. The inverters provide the regulated 120-volt AC electrical source(s) for the 120 VAC distribution systems. As a result the ITS states the requirement in terms of the inverter, while the CTS states the requirement in terms of the bus. However, the technical requirements remain unchanged. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.7, ACTION A	3.8.2.1, Action c

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 A.4	<p>CTS 3.8.2.1 Action c. states that with the AC Vital bus not energized from its associated inverter, re-energize the AC Vital bus from its associated inverter within 24 hours. ITS LCO 3.8.7, Action A, states that with one inverter inoperable, restore the inverter to OPERABLE status within 24 hours. The Action is modified by a Note that states, "Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems – Operating" with any vital bus de-energized." This changes the CTS by providing a reminder to take action for the AC vital bus system that may be affected by the inoperability of an inverter.</p> <p>This change is acceptable because the ITS separates the requirements of the electrical sources from the distribution systems without changing the technical requirements. The inoperability of the source may lead to the de-energized bus. Therefore, the user is reminded to enter the appropriate Conditions that may occur from the inoperable electrical source. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.7, ACTION A Note	3.8.2.1, Action c
3.8.8 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
3.8.8 A.2	<p>CTS LCO 3.8.2.2 states that as a minimum either the H or J train AC and DC buses shall be OPERABLE. The H train specifies the two 120 VAC buses (1-1 and 1-2 or 2-1 and 2) are energized from their associated inverter. The J train similarly states that the two 120 VAC buses (1-3 and 1-4 or 2-3 and 2-4) are energized from their associated inverter. ITS LCO 3.8.8 states, "Inverters shall be OPERABLE to support the onsite Class 1E AC vital bus electrical power distribution subsystem(s) required by LCO 3.8.10, 'Distribution System – Shutdown.'" This changes the CTS by dividing the inverter and distribution requirements into two specifications</p> <p>This change is acceptable because the requirement for inverters to provide electrical power for the AC buses remains unchanged. The inverters provide the associated AC bus with the necessary power to energize the bus. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.8	LCO 3.8.2.2

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 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
3.8.9 A.2	Not used.	N/A	N/A
3.8.9 A.3	<p>ITS Action G states that with two trains of inoperable distribution subsystems that result in a loss of safety function, enter LCO 3.0.3 immediately. The CTS does not include this specific requirement. This changes the CTS by specifically requiring entry into LCO 3.0.3 when a loss of function occurs.</p> <p>This change is acceptable because CTS LCO 3.0.3 would be entered when a LCO is not met and there are no Conditions or Required Actions stated. The loss of more than one bus continues to require the entry into LCO 3.0.3 in the CTS and ITS. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.9 ACTION G	None
3.8.9 A.4	<p>CTS LCO 3.8.2.1 states that the following AC electrical busses shall be OPERABLE and energized with the tie breakers open between redundant busses. These busses include H and J trains of AC 4160 and 480 volts subsystems. This requirement also includes that each of the four 120-volt AC vital buses is energized from its associated inverter that is powered from an associated 125-volt DC bus. CTS LCO 3.8.2.3 requires the following DC bus trains to be energized and OPERABLE with tie breakers between bus trains open. The trains consists of two 125-volt DC buses, two batteries, and a charger. The makeup of the 4160, 480, and 120 volt AC buses and the DC buses is addressed by DOC LA.2. The requirement that all buses are energized is addressed by DOC LA.1. ITS LCO 3.8.9 requires that the H and J Trains of AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE. This changes the CTS by combining the requirements for AC and DC distribution systems into one specification.</p> <p>This change is acceptable because the technical requirements of the CTS are maintained in the ITS requirements. The CTS and the ITS require the various AC and DC subsystems to be OPERABLE. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.9	LCO 3.8.2.1, LCO 3.8.2.3

Table A – Administrative Changes  
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DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 A.5	<p>CTS LCO 3.7.4.1 requires the normal and emergency power supplies to be OPERABLE for the required Service Water pumps. The Control Room ventilation fans, the Auxiliary Building central exhaust fans, and the Component Cooling Water (CC) pumps may require electrical power from the other unit for the pumps and fans to be considered OPERABLE. ITS LCO 3.8.9, Actions, and Surveillance Requirements are modified to include the electrical distribution systems on the other unit that are required to support shared components that are powered for the other unit. This change maintains the CTS requirements in the ITS format.</p> <p>The change is acceptable because these requirements ensure the electrical distribution systems that are needed to support shared components on the other unit, needed for this unit, are maintained OPERABLE. This is the intent of the CTS requirements in LCO 3.7.4.1 for the required shared components are to ensure all electrical system necessary to power these components. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	LCO 3.8.9	LCO 3.7.4.1
3.8.10 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
3.8.10 A.2	<p>ITS 3.8.10 Required Action A.2.5 states, "Declare associated required residual heat removal subsystem(s) inoperable and not in operation." This is required with a Completion Time of "Immediately." CTS 3.8.2.2 does not specifically state this requirement. This changes the CTS by specifically requiring the RHR subsystem(s) to be declared inoperable with a loss of the associated electrical bus.</p> <p>This change is acceptable because the RHR subsystem(s) would be declared inoperable under the CTS requirements. This addition does not change the technical requirements of the CTS but acts as a reminder to enter the Action for the RHR subsystem(s). This change is designated as administrative because it does not result in a technical change to the CTS.</p>	3.8.10, Required Action A.2.5	None

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 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>	None	Various
3.9.1 A.2	<p>CTS LCO 3.9.1 states that with the reactor vessel head unbolted or removed, the boron concentration must be within the limit provided in the LCO. The CTS 3.9.1 Applicability is modified by a footnote that states, "The reactor shall be maintained in MODE 6 when the reactor vessel head is unbolted or removed." ITS 3.9.1 does not include the phrase "with the reactor vessel head unbolted or removed" or the Applicability footnote.</p> <p>This change is acceptable because the technical requirements have not changed. Both the ITS and CTS Specifications are applicable in MODE 6. The ITS defined MODE 6 as, "one or more reactor vessel head closure bolts less than fully tensioned." Therefore, the CTS LCO statement is equivalent to the ITS Applicability and the conditions under which the LCO applies have not changed. The ITS MODE 6 Applicability is defined as the reactor vessel head unbolted or removed, so the Applicability footnote is not required. This change is designated as administrative because the technical requirements of the specifications have not changed.</p>	None	LCO 3.9.1
3.9.1 A.3	<p>CTS 3.9.1 provides requirements on the boron concentration of filled portions of the Reactor Coolant System and the refueling canal. The ITS provides requirements on the boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity.</p> <p>This change is acceptable because the technical requirements have not changed. The refueling cavity is considered to be governed by the CTS requirements because the refueling cavity is typically connected to the RCS, the refueling canal, or both. This change is designated as administrative because the technical requirements of the specifications have not changed.</p>	LCO 3.9.1	3.9.1
3.9.1 A.4	<p>CTS 3.9.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.1 does not contain an equivalent statement.</p> <p>This change is acceptable because the technical requirements have not changed. ITS LCO 3.0.3 is not applicable in MODE 6. Therefore, the LCO 3.0.3 exception is not needed. This change is designated as administrative because the technical requirements of the specifications have not changed.</p>	None	3.9.1

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.2 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>	None	Various
3.9.2 A.2	<p>CTS 3.1.1.3.2 states, "The following valves shall be locked, sealed or otherwise secured in the closed position except during planned boron dilution or makeup activities." ITS LCO 3.9.2 states, "Each valve used to isolate primary grade water flow paths shall be secured in the closed position." A Note to the LCO states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." ITS SR 3.9.2.1 states, "Verify each valve that isolates primary grade water flow paths is locked, sealed, or otherwise secured in the closed position."</p> <p>This change is acceptable because the technical requirements have not changed. In the ITS, requirements that valves be locked, sealed, or otherwise secured are located in the Surveillances, not the LCO. Under SR 3.0.1, the SRs provide requirements necessary to meet the LCO. Therefore, moving the requirement from the LCO to the SR has no effect. The addition of the phrase "under administrative control" to the LCO Note is consistent with the ITS conventions and does not change the application of the Note as, according to UFSAR Section 15.2.4, strict administrative controls are applied to the operation of the primary grade water flow path isolation valves. This change is designated as administrative because it does not result in a technical change to the specifications.</p>	SR 3.9.2.1	3.1.1.3.2
3.9.3 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>	None	Various

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 A.2	<p>CTS 3.9.2 LCO is applicable in MODE 6, but in the Action states, "The provisions of Specification 3.0.3 are not applicable." CTS LCO 3.0.3 states that the requirement is, "applicable in MODES 1, 2, 3, and 4." Therefore, LCO 3.0.3 is not applicable in MODE 6. ITS 3.9.3 does not contain this requirement. This changes the CTS by deleting the reference to LCO 3.0.3.</p> <p>This change is acceptable because the statement is not required to be stated in the CTS or ITS requirements. Therefore, deleting the statement does not modify any technical requirements contained in the CTS. This change is designated as administrative because it does not result in a technical change to the CTS.</p>	None	LCO 3.9.2
3.9.4 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>	None	Various
3.9.4 A.2	<p>CTS 3.9.4 states, "The provisions of Specification 3.0.3 are not applicable." CTS 3.9.4 is only applicable during specified conditions of MODE 6. ITS 3.9.4 does not include this statement. ITS LCO 3.0.3 states, "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.4
3.9.4 A.3	<p>CTS 4.9.4 states, in part, "Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve . . . by verifying the penetrations are in their closed/isolated condition." ITS SR 3.9.4.1 states, "Verify each required containment penetration is in the required status." This changes the CTS by eliminating the discussion of the required status of the containment penetrations from the Surveillance.</p> <p>This change is acceptable because the CTS requirements have not changed. The required status of the penetrations in CTS 4.9.4 is the same as the description in CTS LCO 3.9.4. The ITS eliminates this duplication by referring to the "required status" of the penetrations and relying on the LCO description. The changes to the CTS LCO requirements are described in other DOCS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.9.4.1	4.9.4

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 A.4	<p>CTS 4.9.4.a is modified by a footnote ** which states "If both doors of the containment personnel airlock are open pursuant to Specification 3.9.4.b above, one door shall be verified to be capable of being closed at the above surveillance frequency." ITS SR 3.9.4.1 states, "Verify each required containment penetration is in the required status." This changes the CTS by eliminating the explicit discussion of the containment personnel airlock surveillance testing.</p> <p>This change is acceptable because the CTS requirements have not changed. Both the CTS and the ITS require verification that one containment airlock door is capable of being closed every 7 days. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	SR 3.9.4.1	4.9.4, footnote **
3.9.4 A.5	<p>CTS 3.9.4, Footnote *, states that both doors of the containment personnel airlock may be open provided, in part, that there is at least 23 feet of water above the top of the reactor pressure vessel flange during movement of fuel assemblies within the containment. ITS 3.9.4 does not contain these restrictions.</p> <p>This change is acceptable because the requirements in the footnote are duplicative of the requirements of ITS LCO 3.9.7, which requires 23 feet of water above the top of the reactor vessel flange during movement of recently irradiated fuel assemblies within containment. Addition of the word "recently" is addressed in the DOCs of ITS 3.9.7. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.4, Footnote *
3.9.5 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>	None	Various
3.9.5 A.2	<p>CTS 3.9.8.1 LCO is modified by a footnote, *, which states that the normal or emergency power source may be inoperable for each RHR loop. ITS 3.9.5 does not include this statement. The ITS definition of "OPERABLE" states that a component is OPERABLE if either the normal or emergency power source is OPERABLE. This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because the ITS definition of OPERABLE contains the necessary requirements for a component to perform its safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.8.1 Footnote *

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.5 A.3	<p>CTS 3.9.8.1, Action b, states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.5 states that with the RHR loop requirements not met, suspend operations involving a reduction in reactor coolant boron concentration and suspend loading irradiated fuel assemblies in the core. This changes the CTS by requiring that the loading of irradiated fuel assemblies be suspended instead of requiring that all operations involving an increase in the reactor decay heat load be suspended.</p> <p>This change is acceptable because the requirements have not changed. The reactor decay heat load is generated by irradiated fuel. The only method of increasing the decay heat load of a reactor in MODE 6 is to load additional irradiated fuel assemblies into the core. Therefore, the CTS and ITS requirements are equivalent. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.9.5 Actions	3.9.8.1, Action b
3.9.5 A.4	<p>CTS 3.9.8.1 Action d, states, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.5 does not include this statement. ITS LCO 3.0.3 states, "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.8.1 Action d
3.9.6 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>	None	Various
3.9.6 A.2	<p>CTS 3.9.8.2 LCO is modified by a footnote, *, which states that the normal or emergency power source may be inoperable for each RHR loop. ITS 3.9.6 does not include this statement. The ITS definition of "OPERABLE" states that a component is OPERABLE if either the normal or emergency power source is OPERABLE. This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because the ITS definition of OPERABLE contains the necessary requirements for a component to perform its safety function. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.8.2 Footnote *

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.6 A.3	<p>CTS 3.9.8.2, Action a, states, that with less than the required RHR loops OPERABLE, immediately initiate corrective action to return the required RHR loops to OPERABLE status as soon as possible. ITS 3.9.6, Condition A, states that with less than the required number of RHR loops OPERABLE, immediately initiate action to restore required RHR loops to OPERABLE status or immediately initiate action to establish 23 feet of water above the top of reactor vessel flange. This changes the CTS by providing the option to exit the Applicability of the LCO.</p> <p>This change is acceptable because the requirements have not changed. Exiting the Applicability of LCO is always an option to exit a Condition. Therefore, stating this option explicitly does not change the requirements of the specification. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.9.6, Condition A	3.9.8.2, Action a
3.9.6 A.4	<p>CTS 3.9.8.2 Action c, states, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.6 does not include this statement. ITS LCO 3.0.3 states, "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." This changes CTS by deleting an allowance already provided in a different portion of the ITS.</p> <p>This change is acceptable because ITS LCO 3.0.3 requirements are consistent with those stated in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	None	3.9.8.2, Action c
3.9.6 A.5	<p>CTS 3.9.8.2, Action b, states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.6 states that with no RHR loop in operation, suspend operations involving a reduction in reactor coolant boron concentration. This changes the CTS by eliminating the requirement to suspend operations involving an increase in reactor decay heat load</p> <p>This change is acceptable because the requirements have not changed. The reactor decay heat load is generated by irradiated fuel. The only method of increasing the decay head load of a reactor in MODE 6 is to load additional irradiated fuel assemblies into the core. However, ITS LCO 3.9.7 prohibits loading of fuel assemblies into the reactor when the water level is less than 23 feet. Therefore, when LCO 3.9.6 is applicable, there is no method available to increase the reactor decay heat load and the requirement can be deleted with no effect on plant operations. This change is designated as administrative because it does not result in technical changes to the CTS.</p>	3.9.6 Actions	3.9.8.2, Action b

Table A – Administrative Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.7 A.1	In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	None	Various
	These changes are designated as administrative changes and are acceptable, because they do not result in technical changes to the CTS.		
3.9.7 A.2	CTS 3.9.10.1 Action contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.7 does not contain an equivalent statement.	None	3.9.10.1
	This change is acceptable because the technical requirements have not changed. ITS LCO 3.0.3 is not applicable in MODE 6. Therefore, the LCO 3.0.3 exception is not needed. This change is designated as administrative because the technical requirements of the specifications have not changed.		
3.9.7 A.3	CTS 3.9.10.1 is applicable in MODE 6 during movement of fuel assemblies within containment. ITS 3.9.7 is applicable during the movement of irradiated fuel assemblies within containment. This change is the CTS by eliminating the "MODE 6" portion of the applicability. Qualification of irradiated fuel vice fuel is discussed in DOCL.1.	3.9.7 Applicability	3.9.10.1 Applicability
	This change is acceptable because the technical requirements have not changed. Fuel movement in the containment only occurs in MODE 6. Therefore, specifying MODE 6 during movement of fuel is unnecessary. This change is designated as administrative because the technical requirements of the specifications have not changed.		

Table A – Administrative Changes  
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 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
4.0 A.2	<p>CTS 5.6.1.3 contains requirements on storing new fuel for the first core dry in the spent fuel pool storage racks. The ITS does not contain this information.</p> <p>This change is acceptable because the requirements are no longer relevant. The North Anna reactors have loaded their first cores and the spent fuel pool is filled with water. These requirements will not be used again. This change is designated as administrative because it eliminates one-time requirements which no longer apply.</p>	None	5.6.1.3
4.0 A.3	<p>ITS 4.1 contains a description of the site location. The CTS does not contain this information.</p> <p>This change is acceptable because it does not add, delete, or modify any requirements. This change is designated administrative because it does not result in a technical change to the specifications</p>	4.1	None

Table A – Administrative Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 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
5.0 A.2	<p>CTS Table 6.2-1 states Shift Supervisor (SS), Senior Reactor Operator (SRO) and Reactor Operator (RO) manning requirements. The ITS does not include these manning requirements. This changes the CTS by not including manning requirements already required by 10 CFR 50.54(m)(2)(i).</p> <p>The purpose of CTS Table 6.2-1 is to specify the minimum shift crew composition consistent with 10 CFR (m)(2)(i). This change is acceptable because 10 CFR 50.54 (m)(2)(i) already states this required composition. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	Table 6.2-1
5.0 A.3	<p>CTS 6.8.1.b requires written procedures be established, implemented and maintained covering refueling operations. CTS 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment. ITS 5.4.1.a requires written procedures shall be established, implemented and maintained to cover the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. This changes the CTS by deleting the specific wording of 6.8.1.b and 6.8.1.c, which is already addressed by Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 and is committed to in CTS 6.8.1.a and ITS 5.4.1.a. CTS 6.8.1.b requires written procedures be established, implemented and maintained covering refueling operations. CTS 6.8.1.c requires written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment. ITS 5.4.1.a requires written procedures shall be established, implemented and maintained to cover the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. This changes the CTS by deleting the specific wording of 6.8.1.b and 6.8.1.c, which is already addressed by Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 and is committed to in CTS 6.8.1.a and ITS 5.4.1.a.</p> <p>This change is acceptable because the recommendations of Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 already require procedures for refueling operations and for surveillance tests for safety related activities. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.4.1.a	6.8.1.b and 6.8.1.c

Table A – Administrative Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.4	<p>CTS 6.8.1.d and CTS 6.8.1.e require written procedures be established, implemented, and maintained to address implementation of the Security Plan and the Emergency Plan. The ITS does not contain these requirements. This changes the CTS by deleting the specific reference to the Security Plan and the Emergency Plan because they are already required by 10 CFR 50.54(p) and 10 CFR 50.54(q), respectively.</p> <p>This change is acceptable because the requirements for implementation of the Security and Emergency Plans are contained in 10 CFR 50.54(p) and 10 CFR 50.54(q). This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.8.1d and 6.8.1.e
5.0 A.5	<p>ITS 5.5.10, Ventilation Filter Testing Program (VFTP), states, "A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at frequencies in general conformance with, and in accordance with Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of, Regulatory Guide 1.52, Revision 2, and ANSI N510-1975." CTS 4.7.7.1 (Control Room Emergency Ventilation System) and 4.7.8.1 (Safeguards Area Ventilation System) include requirements for ventilation filter testing in accordance with Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, and ANSI N510-1975. This changes the CTS by consolidating existing ventilation requirements in a single program.</p> <p>The purpose of CTS 4.7.7.1 and 4.7.8.1 is to specify the Surveillance Requirements for the ventilation filter testing in accordance with Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, and ANSI N510-1975. This change is acceptable because it retains existing ventilation testing requirements in a single program in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.10	4.7.7.1 and 4.7.8.1
5.0 A.6	<p>CTS Table 6.2-1 states, "During any absence of the Shift Supervisor from the Control Room while the unit is in MODE 5 or 6, and individual with a valid RO license...shall be designated to assume the Control Room command function." ITS 5.1.2 adds the option for a person with an active SRO license to assume the Control Room command function. This changes the CTS by clarifying that an SRO may also assume the Control Room command function.</p> <p>This change is acceptable because a person with an SRO license is always allowed to assume the Control Room command function. The CTS and ITS allowance to use an RO is an exception to that requirement. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.1.2	Table 6.2-1

Table A – Administrative Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.7	<p>ITS 5.5.8 states, "The provisions of SR 3.0.2 are applicable to the SG Tube Surveillance Program Test Frequencies." CTS 3.4.5 does not include such a reference because CTS 4.0.2 already applies to CTS 3.4.5. This changes the CTS by adding an explicit reference to the ITS for an allowance provided without the reference in the CTS.</p> <p>This change is acceptable because the added phrase retains an existing allowance, and is only required because of the change in format from CTS to ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.8	3.4.5
5.0 A.8	<p>CTS 6.11, Radiation Protection Program, states, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure." The ITS does not include a requirement for a Radiation Protection Program. This changes the CTS by removing references to requirements already required by 10 CFR Part 20.</p> <p>This change is acceptable because the requirements of 10 CFR Part 20 are already required to be met. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.11
5.0 A.9	<p>CTS 6.2.2.d states, "ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation." ITS 5.2.2 does not contain this requirement. 10 CFR 50.54(m)(2)(iv) states, "Each licensee shall have present, during alteration of the core of a nuclear power unit (including fuel loading or transfer), a person holding a senior operator license or a senior operator license limited to fuel handling to directly supervise the activity and, during this time, the licensee shall not assign other duties to this person." This changes the CTS 6.2.2.d by deleting this information because it is already a requirement in accordance with 10 CFR 50.54 (m)(2)(iv).</p> <p>The purpose of CTS 6.2.2.d is to ensure the presence of a licensed SRO or licensed SRO limited for fuel handling who has no other concurrent responsibilities during this operation. This change is acceptable because it is a duplication of 10 CFR 50.54 (m)(2)(iv), and the requirement is retained, but not in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.2.2.d

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ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.10	<p>CTS 4.6.1.1, CTS 4.6.1.2, CTS 3.6.1.3, and CTS 4.6.1.3 specify the leakage rate requirements for Containment Integrity and the Containment Air Locks. ITS 5.5.15, Containment Leakage Rate Testing Program, specifies the leakage rate requirements for the Containment and Containment Air Locks within the Containment Leakage Rate Testing Program. This changes the CTS by moving the leakage rate acceptance criteria for Containment Integrity and Containment Air Locks in the CTS to ITS 5.5.15, "Containment Leakage Rate Testing Program."</p> <p>This change is acceptable because the same containment leakage rate requirements are being applied, but as a program in ITS 5.5.15 instead of individual LCOs and Surveillance Requirements. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.15	4.6.1.1, 4.6.1.2, 3.6.1.3 and 4.6.1.3
5.0 A.11	<p>CTS 6.15 states, "Changes to the ODCM: a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.r." ITS 5.5.1 states, "Licensee initiated changes to the ODCM: a. Shall be documented and records of reviews performed shall be retained." This changes the CTS by not including a reference to how the records are to be retained.</p> <p>This change is acceptable because referenced requirement CTS 6.10.2.r was removed from the CTS by North Anna amendment 208 (Unit 1) / 189 (Unit 2). This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.1	6.15
5.0 A.12	<p>CTS Table 6.2-1 lists acronym definitions for shift manning. These acronyms are defined as appropriate in parts of ITS 5.0, and the ITS does not include a consolidated list. This changes the CTS by deleting the consolidated acronym list and defining them as needed in ITS 5.0.</p> <p>This change is acceptable because the acronyms are adequately defined where appropriate in ITS 5.0, and it is not necessary to have a consolidated list. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.0	Table 6.2-1
5.0 A.13	<p>CTS 4.0.5.b does not specify a biennial or every 2 years frequency of "at least once per 731 days." ITS 5.5.7 includes a biennial or every 2 years frequency of "at least once per 731 days." This changes the CTS 4.0.5 by incorporating the ASME Boiler and Pressure Vessel Code biennial or every 2 years frequency of "at least once per 731 days."</p> <p>The purpose of CTS 4.0.5.b is to specify the required frequencies for performing inservice testing activities associated with ASME Boiler and Pressure Vessel Code. This change is acceptable because it adds the ASME Boiler and Pressure Vessel Code biennial or every 2 years frequency of "biennially or every 2 years" without adding any new requirements. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.7	4.0.5.b

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.14	<p>CTS 6.9.1.7.d requires the COLR to be provided to the, "NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector." CTS 6.9.1.6 requires the Monthly Operating Report be submitted to, "the Director of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D. C. 20555, with a copy to the Regional Office of Inspection and Enforcement " ITS 5.6.5.d requires the COLR be provided to the NRC. ITS 5.6.4 requires the Monthly Operating Report be submitted. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC, which is addressed by 10 CFR 50.4.</p> <p>This change is acceptable because the distribution of written communications to the NRC is governed by 10 CFR 50.4, and duplication in the Technical Specifications is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.9.1.6 and 6.9.1.7.d
5.0 A.15	<p>Unit 1 CTS Table 4.4-2, Steam Generator Tube Inspection, 2<sup>nd</sup> Sample Inspection, Additional SG is C-3, Action Required includes, "Report to NRC..." Unit 2 CTS Table 4.19-2, Steam Generator Tube Inspection, 1<sup>st</sup> Sample Inspection, C-3 result, and 2<sup>nd</sup> Sample Inspection, Additional SG is C-3, Action Required includes, "Special Report." ITS Table 5.5.8-2 does not include a statement requiring prompt NRC notification. ITS 5.6.7.c states, "Results of steam generator tube inspections that fall into Category C-3 require prompt notification of the Commission pursuant to Section 50.72 to 10 CFR Part 50. A Licensee Event Report shall be submitted pursuant to Section 50.73 to 10 CFR Part 50 and shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence." This changes the CTS by removing a reporting reference that is required by other sections of the Technical Specifications.</p> <p>This change is acceptable because a duplicate reporting requirement is deleted that is addressed by other Technical Specifications. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.6.7.c	Table 4.4-2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.16	<p>CTS 4.6.1.2 and CTS 4.6.1.3 regarding the containment and containment penetrations, and each containment air lock, respectively, state they shall, "...be tested by performing leakage rate testing as required by 10 CFR 50, Appendix J, Option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995. The provisions of Specification 4.0.2 are not applicable." ITS 5.5.15, Containment Leakage Rate Testing Program, does not include the statement that the provisions of Specification 4.0.2 are not applicable, but states, "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J." This changes the CTS by removing a statement that part of Section 3.0 does not apply to this testing requirement which is being moved to Section 5.0 because Section 3.0 is understood to not apply to Section 5.0.</p> <p>The purpose of the CTS 4.6.1.2 and CTS 4.6.1.3 statements that the provisions of Specification 4.0.2 are not applicable is to require the testing frequencies for containment and containment penetrations to remain as required by 10 CFR 50, Appendix J, Option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995. The NRC and industry position is that Section 3.0 does not apply to Section 5.0. The statement, "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J," was added to avoid any possible confusion. Therefore, the requirements of CTS 4.0.2 continue to not be applicable to the containment and containment penetration leakage testing requirements, but the format is changed to accommodate moving the testing requirements to Section 5.0. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	4.6.1.2 and 4.6.1.3
5.0 A.17	<p>ITS 5.7.2.a.2 states, in reference to entryways to high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation, "Doors and gates shall remain locked except during periods of personnel or equipment entry or exit." The CTS does not include such a statement. This changes the CTS by adding a clarification that the door and gate barriers may be opened for entry and exit.</p> <p>This change is acceptable because it clarifies that entry and exit through these barriers is allowed under specified controls, as is the case in the CTS. This change is designated administrative because it does not result in technical changes to the CTS</p>	5.7.2.a.2	None

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.18	<p>ITS 5.5.11 states, "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance Frequencies." CTS 3.11.1 and CTS 3.11.2 did not include such requirements because CTS 4.0.2 and 4.0.3, which are equal to ITS SR 3.0.2 and SR 3.0.3, already apply to CTS 3.11.1 and CTS 3.11.2. This changes the CTS by adding a reference for an allowance because it must be stated that the existing allowance applies for testing in Section 5.0.</p> <p>This change is acceptable because the added phrase retains existing allowances, and is only required because of the change in format from the CTS to the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.11	3.11.1 and 3.11.2
5.0 A.19	<p>CTS 6.6.1 states, "The following actions shall be taken for REPORTABLE EVENTS: A. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and..." ITS 5.0 does not include these requirements. This changes the CTS by deleting requirements already required by 10 CFR 50.73.</p> <p>This change is acceptable because the reporting requirements of 10 CFR 50.73 are still required without a reference in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.6.1
5.0 A.20	<p>CTS 1.17, 4.0.5.c, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, 6.9.1.5.b, and 6.12.2 include references to other CTS requirements. The ITS modifies these to ITS references or appropriate requirements. This changes the CTS by making appropriate references in the ITS.</p> <p>This change is acceptable because it makes appropriate reference changes for the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	Various	1.17, 4.0.5.c, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, 6.9.1.5.b, and 6.12.2
5.0 A.21	<p>CTS 4.0.5.a states, "Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). CTS 4.0.5 and CTS 4.0.5.c reference inservice inspection requirements for ASME Code Class 1, 2, and 3 components. ITS 5.5.7 does not include the statement in CTS 4.0.5.a and does not include references to inservice inspection. This changes the CTS by not including a reference to 10 CFR 50.55a requirements or references to ASME Code Class 1, 2, and 3 inservice inspection. The 10 CFR 50.55a requirements are still applicable without the reference.</p> <p>This change is acceptable because the 10 CFR Part 50 requirements are still applicable and referencing them separately is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	4.0.5

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.22	<p>CTS 4.4.10.1.1 states, "In addition to the requirements of Specification 4.0.5, the Reactor Coolant pump flywheels shall be inspected..." ITS 5.5.6 does not include the reference to Specification 4.0.5, which is ITS 5.5.7, Inservice Testing Program. This changes the CTS by not referencing CTS 4.0.5 requirements which are required regardless of the reference.</p> <p>This change is acceptable because it deletes a reference to a requirement that has it's own criteria for application, regardless of the reference. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	4.4.10.1
5.0 A.23	<p>ITS 5.5.10 states, "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VITP test frequencies." CTS 4.7.7 and CTS 4.7.8 do not explicitly state these allowances, but they apply as CTS 4.0.2 and CTS 4.0.3, which are equal to ITS SR 3.0.2 and SR 3.0.3, because these allowances apply to all the CTS LCO Surveillance Requirements. This changes the CTS by explicitly invoking the allowances of ITS SR 3.0.2 and ITS SR 3.0.3 because the requirements have been moved to Section 5.0, and an explicit allowance is needed to retain the existing allowances.</p> <p>This change is acceptable because it retains existing allowances by transferring them into ITS format. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.10	4.7.7. and 4.7.8
5.0 A.24	<p>CTS 6.9.1 states, "In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted." ITS 5.6 states, "The following reports shall be submitted in accordance with 10 CFR 50.4." This changes the CTS by referencing 10 CFR 50.4 as the reference for how to submit reports and excluding the remaining detail, which is already addressed in 10 CFR 50.4.</p> <p>This change is acceptable because the reporting requirements are already established in 10 CFR 50.4, and do not need to be repeated in the ITS. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.9.1
5.0 A.25	<p>CTS 6.9.1.4 regarding annual reports states, "The initial report shall be submitted prior to March 1 of the year following initial criticality." The ITS does not include such a statement. This changes the CTS by deleting a requirement for report submissions that have already occurred and will not be repeated.</p> <p>This change is acceptable because the one time report requirement has already been met and no longer needs to be specified. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.9.1.4
5.0 A.26	Not used.	N/A	N/A

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.27	<p>CTS 6.9.1.7.e.2f, References for the Core Operating Limits Report, states, "WCAP-12610, "VANTAGE+FUEL ASSEMBLY REPORT," June 1990 (W Proprietary)." ITS 5.6.5.b.7 states, "VANTAGE+FUEL ASSEMBLY-REFERENCE CORE REPORT." This changes the CTS by correcting the reference to the title of WCAP-12610. Regarding deletion of, "June 1990 (W Proprietary)," see DOC LA.9.</p> <p>This change is acceptable because it corrects the title of a reference used, without changing the reference. This change is designated administrative because it does not result in technical changes to the CTS</p>	5.6.5.b.7	6.9.1.7.e.2f
5.0 A.28	<p>CTS 6.2.4.1 states, "The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters..." CTS 6.3.1.2 states, "Incumbents in the positions of Shift Supervisor, Assistant Shift Supervisor (SRO), Control Room Operator – Nuclear (RO), and Shift Technical Advisor, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4)." ITS 5.2.2.f states, "An individual shall provide advisory technical support to the unit operations shift crew..." ITS 5.3.1 states, "The SS, Assistant SS, Control Room Operator – Nuclear, and individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4)." This changes the CTS by removing the Shift Technical Advisor title, and replacing the term Shift Supervisor with unit operations shift crew, though the requirement for the person with the specified responsibility remains the same.</p> <p>This change is acceptable because the individual assigned to the responsibilities described still carries out the same tasks. The support provided is for the benefit of the unit operations shift crew, as well as the Shift Supervisor. This change clarifies that the assigned individual may provide the support directly to the Shift Supervisor or other members of the unit operations shift crew, but the result will be support for the crew as a whole in either case. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.2.2.f and 5.3.1	6.2.4.1 and 6.3.1.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.29	<p>CTS 6.2.4.1 states, "The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters..." CTS 6.3.1.2 states, "Incumbents in the positions of Shift Supervisor, Assistant Shift Supervisor (SRO), Control Room Operator – Nuclear (RO), and Shift Technical Advisor, shall meet or exceed the requirements of 10 CFR 55.59(e) and 55.31(a)(4)." ITS 5.2.2.f states, "An individual shall provide advisory technical support to the unit operations shift crew..." ITS 5.3.1 states, "The SS, Assistant SS, Control Room Operator – Nuclear, and individual providing advisory technical support to the unit operations shift crew, shall meet or exceed the requirements of 10 CFR 55.59(e) and 55.31(a)(4)." This changes the CTS by removing the Shift Technical Advisor title, and replacing the term Shift Supervisor with unit operations shift crew, though the requirement for the person with the specified responsibility remains the same.</p> <p>This change is acceptable because the individual assigned to the responsibilities described still carries out the same tasks. The support provided is for the benefit of the unit operations shift crew, as well as the Shift Supervisor. This change clarifies that the assigned individual may provide the support directly to the Shift Supervisor or other members of the unit operations shift crew, but the result will be support for the crew as a whole in either case. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.3.2	None
5.0 A.30	<p>CTS 6.8.4.e.2 states that the program provided conforming with 10 CFR 50.36a includes, "Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times 10 CFR Part 20 Appendix B, Table 2, Column 2." ITS 5.5.4.b references 10 CFR 20.1001-20.2402. This changes the CTS by referencing the specific portion of 10 CFR Part 20 that includes the referenced requirement.</p> <p>This change is acceptable because it clarifies which regulatory requirement is referenced for meeting the Technical Specification requirement, but does not change the requirement. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.4.b	6.8.4.e.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.31	<p>CTS 6.12.1 applies for control of entry into high radiation areas in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr. CTS 6.12.2 applies for control of entry into high radiation areas in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. ITS 5.7.1 applies to controls for high radiation areas with dose rates not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation. ITS 5.7.2 applies to controls for high radiation areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates. This changes the CTS by deleting the reference to a high radiation area having radiation intensity in excess of 100 mrem/hr, and adds the criteria of, "at 30 centimeters from the radiation source or from any Surface Penetrated by the Radiation" to the parameter 1000 mrem/hr.</p> <p>These changes are acceptable because the 100 mrem/hr definition for a high radiation area is already addressed by 10 CFR 20.1003, and the method of measuring the 1000 mrem/hr is clarified in terms of being measured from a point source and from a surface. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.7.1 and 5.7.2	6.12.1 and 6.12.2
5.0 A.32	<p>CTS 4.0.5.d states, "Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements." The ITS does not include an equivalent requirement. This changes the CTS by not explicitly stating that the inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.</p> <p>This change is acceptable because the inservice inspection and testing activities are still required by 10 CFR 50.55a, as appropriate, and ITS 5.5.7, the Inservice Testing Program. A specific reference to this fact is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	4.0.5.d
5.0 A.33	<p>CTS 4.0.5.d states, "Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements." The ITS does not include an equivalent requirement. This changes the CTS by not explicitly stating that the inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.</p> <p>This change is acceptable because the inservice inspection and testing activities are still required by 10 CFR 50.55a, as appropriate, and ITS 5.5.7, the Inservice Testing Program. A specific reference to this fact is unnecessary. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.9.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.34	<p>CTS 6.2.2.b states, "At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room." The ITS does not include this phrase. This changes the CTS by deleting two requirements, both of which are addressed by 10 CFR 50.54.</p> <p>10 CFR 50.54 (m)(2)(iii) states, "When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by a unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times." 10 CFR 50.54(k) states, "An operator or senior operator licensed pursuant to part 55 of this chapter shall be present at the controls at all times during operation of the facility." This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.54. This change is designated administrative because it does not result in technical changes to the CTS.</p>	None	6.2.2.b
5.0 A.35	<p>CTS 6.8.4.c(v) states that the secondary water chemistry monitoring program shall include, "Procedures defining corrective actions for all control point chemistry conditions." ITS 5.5.9.e states that the secondary water chemistry monitoring program shall include, "Procedures defining corrective actions for all off control point chemistry conditions." This changes the CTS by adding the word "off" to the term control point.</p> <p>This change is acceptable because the intent of CTS 6.8.4(v) is to provide procedures for what to do when the control point chemistry conditions are not within limits, which is more accurately stated using the term "off control point." This change clarifies an existing requirement. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.9.e	6.8.4.c(v)
5.0 A.36	<p>ITS 5.5.15.e states, "The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program." The CTS do not contain such a statement. This changes the CTS by stating that SR 3.0.3 applies because in the CTS the allowance in CTS 4.0.2, which is the same as ITS SR 3.0.3, already applies.</p> <p>This change is acceptable because it retains the allowance in CTS 4.0.2, which must be explicitly stated for it to apply to a requirement in ITS Section 5.0. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.15.e	4.0.2

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.37	<p>CTS 6.9.1.7.a contains a list of the core operating limits established and documented in the Core Operating Limits Report (COLR). ITS 5.6.5.a includes additional core operating limits established and documented in the COLR. These are: Safety Limits, Shutdown Margin, Reactor Trip System Instrumentation – OTΔT and OPΔT Trip Parameters, RCS Pressure, Temperature, and Flow DNB Limits, and Boron Concentration. These limits had previously been addressed in other parts of the CTS, but are being moved to the COLR, and because of this are listed in ITS 5.6.5.a. The change also deletes references associating the core operating limits listed with other sections in the CTS. This changes CTS by adding core operating limits established and documented in the COLR because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed by Discussions of Change for the respective individual specifications.</p> <p>This change is acceptable because it administratively documents changes made to other parts of the CTS and the COLR. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.6.5.a	6.9.1.7.a
5.0 A.38	<p>CTS 6.9.1.7.a contains a list of the core operating limits established and documented in the Core Operating Limits Report (COLR). ITS 5.6.5.a includes additional core operating limits established and documented in the COLR. These are: Safety Limits, Shutdown Margin, Reactor Trip System Instrumentation – OTΔT and OPΔT Trip Parameters, RCS Pressure, Temperature, and Flow DNB Limits, and Boron Concentration. These limits had previously been addressed in other parts of the CTS, but are being moved to the COLR, and because of this are listed in ITS 5.6.5.a. The change also deletes references associating the core operating limits listed with other sections in the CTS. This changes CTS by adding core operating limits established and documented in the COLR because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed by Discussions of Change for the respective individual specifications.</p> <p>This change is acceptable because it administratively documents changes made to other parts of the CTS and the COLR. This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.8	None

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DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.0 A.39	<p>CTS 4.0.5.b refers to Section XI and ASME, Boiler and Pressure Vessel Code." ITS 5.5.7 refers to the "ASME Code for Operation and Maintenance of Nuclear Power Plants" and does not reference Section XI. This changes the CTS by revising the title of the applicable ASME Code for the Inservice Testing Program to match the currently approved version.</p> <p>This change is acceptable because North Anna has adopted the ASME Code for Operation and Maintenance of Nuclear Power Plants, the 1995 Edition and the 1996 Addenda, as required by 10 CFR 50.55a(b)(3). This version of the Code does not use Section XI for the Inservice Testing Program and is called the "ASME Code for Operation and Maintenance of Nuclear Power Plants" instead of the "ASME, Boiler and Pressure Vessel Code." This change is designated administrative because it does not result in technical changes to the CTS.</p>	5.5.7	4.0.5.b