ATTACHMENT 3

Table M - More Restrictive Changes

Table M – More Restrictive Changes
ITS Section 1.0 – Use and Application

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
None	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 2.0 – Safety Limits

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
None	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.0 M.1	Not used.	N/A	N/A
3.0 M.2	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "For Frequencies specified as 'once,' the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC L.5.	SR 3.0.2	4.0.2

Table M – More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.1.1 M.1	CTS 4.1.1.1.1.e and CTS 4.1.1.2.b requires SDM to be determined to be within its limit every 24 hours when in MODES 3, 4, and 5. ITS SR 3.1.1.1 requires SDM to be determined to be within its limit in MODE 2 with $K_{eff} < 1.0$, and MODES 3, 4, and 5. This changes the CTS by expanding the applicability of the Surveillance to include MODE 2 with $K_{eff} < 1.0$.	SR 3.1.1.1	4.1.1.1.1.e, 4.1.1.2.b
3.1.2 M.1	ITS SR 3.1.2.1 requires the core reactivity balance to be determined to be within 1% Δk/k of the predicted value once prior to entering MODE 1 after each refueling. The CTS does not contain a similar requirement. This changes the CTS by adding an additional performance requirement for the core reactivity balance SR.	SR 3.1.2.1	None
3.1.3None	N/A	N/A	N/A
3.1.4 M.1	CTS 3.1.3.1, Action c, states that with one rod misaligned, POWER OPERATION may continue provided that certain actions are completed within one hour. If those actions are not complete, CTS 3.0.3 would be entered which requires entry into MODE 3 within 7 hours, for a total time from condition discovery to entry into MODE 3 of 8 hours. ITS 3.1.4, Action C, states that if the Required Actions and associated Completion Times of Condition B, one rod not within alignment limits, are not met, the unit must be in MODE 3 in 6 hours. The shortest Completion Time in ITS Condition B is one hour. Therefore, under the ITS, the time from discovery of the condition to entry into MODE 3 is 7 hours. This changes the CTS by providing one less hour for entry into MODE 3 following discovery of a misaligned rod.	3.1.4, Action C	3.1.3.1, Action c
3.1.5 M.1	CTS 3.1.3.5 is applicable in MODE 1 and MODE 2 with $k_{eff} \geq 1.0$. ITS 3.1.5 is applicable in MODES 1 and 2. This changes the CTS by expanding the applicability from MODE 2 with the reactor critical to all of MODE 2. This has the effect of expanding the applicability of the requirements.	3.1.5 Applicability	3.1.3.5 Applicability
3.1.6 M.1	CTS LCO 3.1.3.6 requires the control banks to be limited in physical insertion as specified in the CORE OPERATING LIMITS REPORT. ITS LCO 3.1.6 requires the control banks to be within the insertion, sequence, and overlap limits specified in the COLR. ITS Condition A provides Actions for not meeting the overlap and sequence requirements, and ITS SR 3.1.6.3 requires verification of the overlap and sequence every 12 hours. This changes the CTS by adding requirements on the overlap and sequence to the Technical Specifications.	LCO 3.1.6, Condition A, SR 3.1.6.3	3.1.3.6
3.1.6 M.2	CTS 3.1.3.6, Action a, requires control banks inserted beyond the insertion limits to be restored within 2 hours or the plant to be in HOT STANDBY within 6 hours. ITS 3.1.6, Condition B, contains the same requirements and adds the requirement to verify the SDM is within the limits specified in the COLR or initiate boration to restore SDM to within the limit within 1 hour. This changes the CTS by adding the requirement to verify SDM or boration to restore the required SDM within one hour when control banks are below the insertion limits.	3.1.6, Condition B	3.1.3.6, Action a

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.1.7 M.1	CTS 3.1.3.2 does not contain an Action to follow if the provided Actions cannot be met. Therefore, CTS 3.0.3 would be entered which would allow 1 hour to plan a shutdown and be in MODE 3 within 7 hours. ITS 3.1.7 contains Action E which states that the plant must be in MODE 3 if the Required Actions and associated Completion Times are not met. This changes the CTS by eliminating the one hour to plan a shutdown and, consequently, allowing one hour less for the unit to be in MODE 3.	3.1.7, Action E	3.1.3.2
3.1.8 M.1	Unit 1 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position in MODES 3 and 4, the plant must be in COLD SHUTDOWN within 30 hours. If in MODE 5 or 6, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, and the valves must be locked, sealed, or secured in the closed position within 15 minutes. Unit 2 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, the isolation valves must be locked, sealed, or otherwise secured in the closed position within 15 minutes, and SHUTDOWN MARGIN must be verified greater than or equal to 1.77% Δk/k within 60 minutes. ITS 3.1.8 Actions state than when the primary grade water flow paths are not isolated, positive reactivity additions must be suspended immediately, the primary grade water flow paths must be isolated within 15 minutes and SR 3.1.1.1 must be performed within 4 hours. The Condition is modified by a Note requiring that the SR 3.1.1.1 performance be done whenever Condition A is entered. This changes the Unit 1 CTS by adding a requirement to verify the SHUTDOWN MARGIN within 4 hours and by requiring the SHUTDOWN MARGIN be performed whenever the Condition is entered. The other changes to CTS 3.1.1.3.2 are discussed in DOCs A.3, L.1, and LA.1.	3.1.8 ACTIONS	3.1.1.3.2
3.1.9 M.1	CTS 3.10.1 provides an exception to the SHUTDOWN MARGIN requirements in CTS 3.1.1.1 for the purpose of performing rod worth measurement in the N-1 configuration (all rods inserted into the core except 1). The ITS does not contain the test exception. This changes the CTS by eliminating a test exception.	None	3.10.1
3.1.9 M.2	CTS 3.10.2 provides an exception to the rod group height, rod insertion, and power distribution limits for the purpose of performing the control rod pseudo ejection test, control rod pseudo drop and misalignment test, and xenon stability measurements. The ITS does not contain the test exception. This changes the CTS by eliminating a test exception.	None	3.10.2
3.1.9 M.3	CTS 3.10.3 provides an exception to CTS 3.1.1.4, 3.1.3.1, 3.1.3.5, and 3.1.3.6 during the performance of PHYSICS TESTS and provides restrictions that must be followed when utilizing the exception. ITS 3.1.9 provides an exception to the equivalent ITS LCOs and to the restrictions that must be followed adds a requirement that SHUTDOWN MARGIN must be within the limits provided in the COLR. A Surveillance to verify the SHUTDOWN MARGIN every 24 hours and ACTIONS to follow if the	LCO 3.1.9, 3.1.9 ACTIONS, SR 3.1.9.4	3.10.3

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
	SHUTDOWN MARGIN limit is not met are also added to the CTS. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.		
3.1.9 M.4	Unit 1 CTS 3.10.3 provides an exception to CTS 3.1.1.4, 3.1.3.1, 3.1.3.5, and 3.1.3.6 during the performance of PHYSICS TESTS and provides restrictions that must be followed when utilizing the exception. ITS 3.1.9 provides an exception to the equivalent ITS LCOs and to the restrictions that must be followed adds a requirement that RCS lowest loop average temperature be ≥ 531 °F. A Surveillance to verify the RCS lowest loop average temperature is ≥ 531 °F and ACTIONS to follow if the RCS lowest loop average temperature is not within limit are also added to the CTS. This changes the CTS by imposing an additional requirement on the application of the test exception LCO. The LCO requirement, Action, and Surveillance being added to the Unit 1 CTS exists in the Unit 2 CTS.	LCO 3.1.9, 3.1.9 ACTIONS, SR 3.1.9.2	3.10.3
3.1.9 M.5	CTS 4.10.3.1 requires THERMAL POWER to be verified to be ≤ 5% once per hour. ITS SR 3.1.9.3 requires the verification be performed every 30 minutes. This changes the CTS by increasing the Frequency of the THERMAL POWER verification.	SR 3.1.9.3	4.10.3.1

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.2.1 M.1	CTS 3.2.2 does not contain an Action to follow if the provided Actions or Completion Times are not followed. Therefore, CTS 3.0.3 would be entered which would require the plant to be in MODE 2 within 7 hours. ITS 3.2.1, Action B, states that when the Required Action and associated Completion Time is not met, the plant must be in MODE 2 within 6 hours. This changes the CTS by providing 6 hours vice 7 hours to be in MODE 2.	3.2.1, Action B	3.2.2
3.2.1 M.2	CTS 3.2.2, Action f.2.a, states that power operation may continue with $F_Q^M(Z)$ outside its limit provided the AFD limits are reduced 1% for each percent $F_Q(Z)$ exceeded its limit. ITS 3.2.1, Action A.1 requires the AFD limits to be reduced ≥ 1% for each 1% $F_Q^M(Z)$ exceeds its limit within 15 minutes. This changes the CTS by providing a Completion Time for an action which does not have a Completion Time in the CTS.	3.2.1, Action A.1	3.2.2, Action f.2.a
3.2.1 M.3	CTS 4.2.2.2.d requires $F_Q^M(Z)$ to be measured upon achieving equilibrium conditions after exceeding the THERMAL POWER at which $F_Q(Z)$ was last determined by 10% or more of RATED THERMAL POWER or at lease once per 31 EFPD. ITS SR 3.2.1.1 contains the same requirements, but also requires $F_Q^M(Z)$ to be verified to be within its limit once after each refueling prior to THERMAL POWER exceeding 75% RTP. This changes the CTS by adding a new Surveillance Frequency.	SR 3.2.1.1	4.2.2.2.d
3.2.2 M.1	CTS 3.2.3, Action c, states that with $F^N_{\Delta H}$ exceeding its limit, subsequent POWER OPERATION may proceed provided that $F^N_{\Delta H}$ is demonstrated through incore mapping to be within its limit at a nominal 50% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, at a nominal 75% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, and within 24 hours after attaining 95% or greater RATED THERMAL POWER. However, under CTS 3.0.2, these measurements do not have to be completed if compliance with the LCO is reestablished. ITS 3.2.2 Condition A contains a Note which states, "Required Actions A.3 and A.4 must be completed whenever Condition A is entered." ITS Required Actions A.3 and A.4 require performance of a $F^N_{\Delta H}$ measurement every 24 hours and prior to exceeding 50% RTP, 75% RTP, and within 24 hours after THERMAL POWER ≥ 95% RTP. This changes the CTS by requiring the $F^N_{\Delta H}$ measurements to be made even if $F^N_{\Delta H}$ is restored to within its limit.	3.2.2, Condition A Note	3.2.3, Action c
3.2.3	None	N/A	N/A
3.2.4 M.1	CTS 3.2.4, Action a.1.b) (Unit 1) and Action a.2(b) (Unit 2) requires THERMAL POWER to be reduced at least 3% for every 1% QPTR exceeds 1.0 and allows a maximum of 24 hours of operation above 50% RTP with QPTR greater than the limit. ITS 3.2.4, Condition A, also requires THERMAL POWER to be reduced at least 3% for every 1% QPTR exceeds 1.0, but the ITS allows indefinite power operation above 50% RTP provided that QPTR is determined within 12 hours, $F_Q(Z)$ and $F^N_{\Delta H}$ are verified to be within limit within 24 hours of achieving equilibrium conditions after the power reduction	3.2.4, Condition A	3.2.4, Action a.1.b) (Unit 1) and Action a.2(b) (Unit 2)

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
	and every 7 days thereafter, and the safety analyses are reevaluated to confirm the results are still valid for the duration of operation under this condition prior to increasing power. If the reevaluation of the safety analyses confirms that the results remain valid, the ITS allows the excore detectors to be normalized to restore QPTR within limit provided that $F_Q(Z)$ and $F^N_{\Delta H}$ are verified to be within limits within 24 to 48 hours after achieving equilibrium condition at RTP. This changes the CTS by requiring $F_Q(Z)$ and $F^N_{\Delta H}$ be verified, the safety analyses be reevaluated, and the excore detectors be normalized to restore QPTR to within the limits. The change eliminating the requirement to reduce power to less than 50% RTP is discussed in DOC L.4.		

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.4	CTS 3.3.1.1 Functional Unit 6 for the Source Range Neutron Flux requires Action 4 to be entered if the number of channels OPERABLE is one less than the minimum number when THERMAL POWER is below P-6 in MODE 2 operation. This Action limits the THERMAL POWER to the P-6 setpoint value until the inoperable channel is restored to OPERABLE status. ITS Function 5 Source Range Neutron Flux requires Condition H to be entered for an inoperable channel. Required Action H states with one inoperable channel all operation involving reactivity changes must be immediately suspended. The requirement is modified by a Note that states, "Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM." This changes the CTS requirements for an inoperable Source Range channel by limiting operation involving positive reactivity changes.	3.3.1 ACTION H Note	Table 3.3-1 Action 4
3.3.1 M.5	CTS requirements for the Source Range instrumentation channels, Functional Unit 6, in Table 3.3-1 state for MODE 2## and MODES 3*, 4*, and 5* that Actions 15 and 4, respectively, are required to be entered for one channel inoperable. The CTS requirements do not address the possibility of two channels inoperable. If two Source Range channels did become inoperable in either applicable condition, LCO 3.0.3 must be entered. This would allow at least one hour before commencing a MODE change. ITS 3.3.1 Function 5, Source Range Neutron Flux, provides an additional Action I. This requires that if two Source Range channels become inoperable, the RTBs will be opened immediately. This changes the CTS by requiring the RTBs to be opened immediately if both Source Range channels become inoperable during start up or with the Rod Control System capable of withdrawing the shutdown and control rod banks.	3.3.1 Action I	Table 3.3-1
3.3.1 M.6	CTS Table 3.3-1 Function 6 Source Range Neutron Flux requires two channels to be OPERABLE in MODES 3, 4, and 5 and, with the RTBs closed and the Rod Control System capable of rod withdrawal. If the required Source Range channel is inoperable, CTS Action 5 must be entered. Action 5 states, with the number of channels OPERABLE one less than the number required, SDM shall be verified within 1 hour and at least once per 12 hours thereafter. ITS 3.3.1 Function 5 Source Range states that 1 channel is required for MODES 3[(c)], 4[(c)], and 5[(c)] and Condition K applies when the channel is inoperable. The notation [(c)] 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." Condition K requires that, with the required Source Range Neutron Flux channel inoperable, all operations involving positive reactivity must be immediately suspended and SR 3.1.1.1 (SDM calculation) must be performed within an hour and every 12 hours thereafter. A Note modifies Condition K and it states, "Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM." This changes the CTS by placing an additional restriction on operations when the Source Range channel is inoperable.	Table 3.3.1-1 NOTE (c), ACTION K Note	Table 3.3-1 Action 5

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

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

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.13	CTS Table 4.3–1 Surveillance Requirements do not require a quarterly test on the OTΔT Functions to ensure an accurate input for the f (ΔI) from the required Power Range channels. ITS Table 3.3.1–1 Function 6 states SR 3.3.1.9 must be performed. ITS SR 3.3.1.9 states, "Compare results of the excore channels to the incore detector measurements." This SR must be performed every 92 effective full power days (EFPD). Two Notes modify the requirement. Note 1 states, " Adjust NIS channel if absolute difference is ≥ 3%." Note 2 states, "Not required to be performed until 72hours after THERMAL POWER is ≥ 50%." This changes the CTS by requiring an additional Surveillance Requirement for the OTΔT Function.	Table 3.3.1-1, SR 3.3.1.9 NOTE 1	None
3.3.2 M.1	CTS Surveillance requirement 4.3.2.1.1 requires the testing of the ESFAS interlocks to determine OPERABILITY. The two interlocks P-11 and P-12 are required to be OPERABLE. No specific requirement is stated or implied to perform a CHANNEL CHECK for the interlocks. ITS SR 3.3.2.1 is added to the surveillance requirements for the P-11 and P-12 interlocks. This change modifies the CTS requirements for these interlocks and requires a CHANNEL CHECK to be performed every twelve hours.	SR 3.3.2.1	4.3.2.1.2
3.3.2 M.2	CTS Surveillance listed in Table 4.3-2 provide CHANNEL CALIBRATION requirements for a variety of functions to be performed at a R (refueling) frequency. ITS Surveillance Requirement 3.3.2.8 specifies a CHANNEL CALIBRATION be performed every 18 months. A Note modifies the SR that states "This Surveillance shall include verification that the time constants are adjusted to the prescribed values." This changes the CTS by adding the requirement to perform a verification of time constants adjusted to prescribed values with a CHANNEL CALIBRATION of the various safety functions.	SR 3.3.2.8 NOTE	Table 4.3-2

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.3	CTS for ESF instrumentation do not require the ESFAS function for the automatic swap over of Low Head Safety Injection (LHSI) pumps suction to the containment sump from the Refueling Water Storage Tank (RWST) on a Low-Low level. ITS ESFAS Instrumentation Function 7 is labeled as the "Automatic Switchover to Containment Sump." This requires that two trains of automatic actuation logic and actuation relays to be OPERABLE in MODES 1, 2, 3, and 4. This requires Action C to be entered if a train becomes inoperable, and SRs 3.3.2.2, 3.3.2.3, and 3.3.2.5 to be performed at specific frequencies. The function requires four channels of RWST level to be OPERABLE in MODES 1, 2, 3, and 4. When two of the four channels reach the RWST Low-Low level setpoint, coincident with a SI signal, the LHSI pump suctions swap from the RWST to the containment sump. ITS Action I is required to be entered for an inoperable channel, and SRs 3.3.2.1, 3.3.2.4, 3.3.2.8, and 3.3.2.9 are required to be performed to verify OPERABILITY. ITS Action I requires an inoperable channel to be placed in bypass within 72 hours or the unit must be placed in MODE 3 within the next 6 hours and MODE 5 within the next 30 hours. A Note that allows an additional channel to be bypassed for up to 12 hours for surveillance testing modifies the Required Action. The Allowable Value for the RWST Level Low-Low is ≥ 18.4 % and ≤ 20.4% for LHSI pump swapover to the containment sump from the RWST. This changes the CTS by adding additional requirements to the CTS.	Table 3.3.2-1 Function 7, Action C, Action I SR 3.3.2.1, SR 3.3.2.2, SR 3.3.2.3, SR 3.3.2.4, SR 3.3.2.5, SR 3.3.2.8 SR 3.3.2.9	None
3.3.2 M.4	CTS requirements for LCO 3.3.2.1 in Table 3.3-3 for various Functions require that Action 14 be entered for an inoperable channel. This requires the inoperable channel to be placed in a blocked condition within 72 hours. If this can not be accomplished, CTS LCO 3.0.3 would require the plant to be shutdown to HOT STANDBY within the next 7 hours and HOT SHUTDOWN within the following 6 hours. ITS LCO 3.3.2 Table 3.3.2-1 for these Functions require with one channel inoperable, the channel is required to be placed in bypass within 72 hours by Required Action D.1. If this can not be accomplished, the plant is required by Required Action D.2 to be placed in MODE 3 within six hours and MODE 4 within the following six hours. This change decreases the time allowed to reach MODE 3 by one hour.	3.3.2 ACTION D	Table 3.3-3, Action 14
3.3.2 M.5	CTS requirement for LCO 3.3.2.1 in Table 3.3-3 Containment Spray and Isolation Functions require that Action 16 is to be entered for an inoperable channel. This requires the inoperable channel to be placed in a blocked condition within 72 hours. If this can not be accomplished, CTS LCO 3.0.3 would require the plant to be shutdown to HOT STANDBY within the next 7 hours and HOT SHUTDOWN within the following 6 hours. ITS LCO 3.3.2 Table 3.3.2-1 for these Containment Functions require with one channel inoperable, the channel is required to be placed in bypass within 72 hours by Required Action E.1. If this can not be accomplished, the plant is required by Required Action E.2 to be placed in MODE 3 within six hours and MODE 4 within the following six hours. This change the CTS by decreases the time allowed to reach MODE 3 by one hour.	3.3.2 ACTION E	Table 3.3-3 Action 16

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.6	CTS Surveillance Requirements listed in Table 4.3-2 for the Station Blackout start for the Auxiliary Feedwater (AFW) pump (function 6.e) requires a CHANNEL CALIBRATION and ESFAS RESPONSE TIMES test to be conducted on a refueling basis. The CTS does not require a CHANNEL FUNCTIONAL TEST to be performed at any frequency. The ITS 3.3.2 Function for the start of the AFW pump on Loss of Offsite Power (6.d) requires the performance of SRs 3.3.2.8 (CHANNEL CALIBRATION) and 3.3.2.9 (ESFAS RESPONSE TIMES) every 18 months, and 3.3.2.6 (TADOT) every 92 days. The TADOT is modified by a Note that states, "Verification of relay setpoints not required." This changes the CTS by requiring the TADOT to be performed every 92 days.	SR 3.3.2.6	None
3.3.2 M.7	CTS requirements in Table 3.3-3 list the Allowable Values for ESFAS Functions and Interlocks. The Allowable Values for the following function are stated as: P-12 ≥ 541 °F, Safety Injection (SI) on Containment Pressure High ≤ 18.5 psia, SI on Pressurizer Pressure Low-Low ≥ 1755 psig, SI on . Steam Flow in Two Steam Lines Coincident with T_{ave} Low-Low or Steam Line Pressure Low ≤ a ΔP corresponding to 44% of full steam flow increasing to 111.5% at full load, Containment Spray on Containment Pressure High-High ≤ 29.25 psia, Steam Line Isolation on Containment Pressure Intermediate High-High ≤ 19.3 psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with T_{ave} Low-Low or Steam Line Pressure Low ≤ a ΔP corresponding to 44% of full steam flow increasing to 111.5% at full load. ITS requirements in Table 3.3.2-1 lists the Allowable Values for the ESFAS Functions and Interlock as the following: P-12 ≥ 542 °F, SI on Containment Pressure High ≤ 17.7 psia, SI on Pressurizer Pressure Low-Low ≥ 1770 psig, SI on Steam Flow in Two Steam Lines Coincident with T_{ave} Low-Low or Steam Line Pressure Low ≤ a ΔP corresponding to 42% of full steam flow increasing to 111% at full load, Containment Spray on Containment Pressure High-High ≤ 28.45 psia, Steam Line Isolation on Containment Pressure Intermediate High-High ≤ 18.5 psia, and Steam Line Isolation on Steam Flow in Two Steam Lines Coincident with T_{ave} Low-Low or Steam Line Pressure Low ≤ a ΔP corresponding to 42% of full steam flow increasing to 111% at full load. This changes the CTS Allowable Values for these functions to more restrictive values in the ITS Allowable Values.	Table 3.3.2-1	Table 3.3-3
3.3.2 M.8	CTS Table 4.3 – 2 for Functional Unit 8.c, Engineered Safety Feature Actuation System Interlock Reactor Trip (P – 4), requires the performance of a CHANNEL FUNCTIONAL TEST every refueling (R). ITS Function 8.a, ESFAS Interlock, Reactor Trip (P – 4), requires the performance of SR 3.3.2.10. This SR requires the performance of a TADOT at a frequency of once per reactor trip breaker (RTB) cycle. The SR is modified by a Note that states, "Verification of setpoint not required." The ITS TADOT and CTS CHANNEL FUNCTIONAL TEST requirements are equivalent. This changes the CTS by increasing the testing Frequency from once per refueling cycle to each time the reactor trip breaker is cycled.	SR 3.3.2.10	Table 4.3 – 2

Table M – More Restrictive Changes
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M.1	CTS 3.3.3.6 Action b states that with the number of OPERABLE accident monitoring instrumentation channels less than the minimum channels OPERABLE requirements of Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours. ITS 3.3.3 Action C states, "One or more Functions with two required channels inoperable, restore one channel to OPERABLE status within 7 days." If this is not accomplished, ITS Action D states, "Required Action and associated Completion Time of Condition C not met, be in MODE 3 in 6 hours and MODE 4 within 12 hours." This changes the CTS requirement by requiring the unit to be in MODE 3 within 6 hours.	3.3.3 ACTION C, 3.3.3 ACTION D	3.3.3.6 Action b
3.3.3 M.2	CTS LCO 3.6.4.1, hydrogen analyzers, is applicable in MODES 1 and 2. CTS 3.6.4.1 Action b states if both hydrogen analyzers are inoperable for more than 7 days, the unit must be placed in HOT STANDBY within the next six hours. ITS 3.3.3 is applicable in MODES 1, 2, and 3. ITS Action D states if two hydrogen analyzers are inoperable for greater than seven days, the unit to be placed in MODE 3 within six hours and MODE 4 within twelve hours. This changes the CTS requirements for the hydrogen analyzers from MODES 1 and 2 to MODES 1, 2, and 3 and the Required Actions from being in MODE 3 to being in MODE 4.	3.3.3 ACTION D	3.6.4.1 Action b
3.3.3 M.3	CTS 3.3.3.6, Table 3.3-10, Functions 4 and 5, require one channel for the reactor coolant pressure-wide range and pressurizer water level functions. ITS 3.3.3, Table 3.3.3-1, Functions 5 and 13 require two channels for RCS Pressure (Wide Range) and Pressurizer Level. This changes the CTS requirements for the parameters from one to two required channels.	Table 3.3.3-1, Functions 5 and 12	Table 3.3-10, Functions 4 and 5

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 M.2	CTS LCO 3.3.3.5 states, "The auxiliary shutdown panel monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE . . . " ITS LCO 3.3.4 states, "The Remote Shutdown System Functions shall be OPERABLE." The following functions for various control systems are added to the ITS requirements: Boric Acid Pump controls, Pressurizer Heaters controls, AFW Pump and Valve controls, SG PORV controls, and Charging Pump controls. These control systems are included in the Bases Table B3.3.4-1. ITS SR 3.3.4.2 is also added and requires verification that each required control circuit or transfer switch is capable of performing its required function once every 18 months. This changes the CTS by adding the control functions and a surveillance to verify their OPERABILITY every 18 months.	LCO 3.3.4, Table B3.3.4-1, SR 3.3.4.2	Table 3.3-9
3.3.4 M.3	CTS 3.3.3.5, Action b, states, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.3.4 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.3.3.5 Action b
3.3.5 M.1	CTS Table 3.3-4, Engineered Safety Feature Actuation System Instrumentation Trip Setpoints, lists the Allowable Values for the Loss of Power on the 4160-Volt Emergency Bus Undervoltage for degraded voltage. The degraded voltage Allowable Value is stated as, "≥ 3688 volts with a time delay of ≤ 63 seconds." This requirements is translated into the ITS SR 3.3.5.2 and states the degraded voltage requirement as, "≥ 3720V and ≤3772V with: 1. a time delay of 7.5 ± 1.5 seconds with a Safety Injection (SI) signal for LCO 3.3.5.a Function; and 2. A time delay of 56 ± 7 seconds without an SI signal for LCO 3.3.5.a and LCO 3.3.5.b Functions." This changes the CTS by changing the Allowable Value from 3688 V to a range of 3720 V to 3772 V and adding the requirement that the time delay with an SI signal be 7.5 ± 1.5 seconds and without an SI signal be 56 ± 7 seconds.	SR 3.3.5.2,	Table 3.3-4
3.3.5 M.2	CTS Table 3.3-4 ESFAS Trip Setpoints lists the Allowable Values for the Loss of Power on the 4160-Volt Emergency Bus Undervoltage for loss of voltage. The loss of voltage Allowable Value is stated as, "≥ 2989 volts with a time delay of ≤ 3.0 seconds." This requirement is translated into ITS SR 3.3.5.2 and states the loss of voltage requirement as, "≥ 2935 V and ≤ 3225 V with a time delay of 2 ± 1 seconds for LCO 3.3.5.a and LCO 3.3.5.b Functions." This changes the CTS by changing the Allowable Value from 2989 V to a range of 2935 V to 3225 V and adding the requirement that the time delay be 2 ± 1 seconds instead of ≤ 3.0 seconds.	SR 3.3.5.2	Table 3.3-4

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M.3	CTS LCO 3.3.2.1, Engineered Safety Feature Actuation System (ESFAS) Instrumentation, states the trip setpoints for the features are required to be set consistent with the values listed in the Trip Setpoint column of Table 3.3-4. ITS LCO 3.3.5, "Loss of Power (LOP) Emergency Diesel Generator (EDG) Start Instrumentation," requires three channels per bus for the undervoltage and degraded voltage Functions for this unit H and J Train 4160 VAC buses to be OPERABLE. The LCO additionally requires the H and/or J Train 4160 VAC buses on the other unit that are needed to support shared components to be OPERABLE. This changes the LCO requirements by specifically requiring LOP EDG start instrumentation from the other unit to be OPERABLE when supporting shared components for this unit.	LCO 3.3.5	Table 3.3-4
3.3.5 M.4	CTS Surveillance Requirements 4.3.2.1.1 and 4.3.2.1.2 require the periodic testing of Loss of Voltage and Degraded Voltage Functions for the Loss of Power on the 4160 kV emergency bus. ITS SRs 3.3.5.1, 3.3.5.2, and 3.3.5.3 require the testing of the LOP EDG start instruments for this unit and the other unit that supplies shared electrical power to shared components. These requirements are specified as LCO 3.3.5.a and LCO 3.3.5.b Functions. This changes the CTS by requiring the other unit loss of voltage and degraded voltage Functions to be tested for this unit if they support shared components.	LCO 3.3.5.a, LCO 3.3.5.b SR 3.3.5.1, SR 3.3.5.2, SR 3.3.5.3	4.3.2.1.1, 4.3.2.1.2
3.3.5 M.5	CTS Table 3.3-3, Functional Unit 7, "LOSS OF POWER," and Table 4.3-2, Functional Unit 7, "LOSS OF POWER," state that the applicable MODES are 1, 2, 3, and 4. ITS 3.3.5 requires Loss of Power EDG Start Instrumentation to be OPERABLE in MODES 1, 2, 3, and 4 and when the associated EDG is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown." This changes the CTS by expanding the conditions under which the Loss of Power instrumentation must be OPERABLE.	3.3.5 Mode of Applicability	None

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 M.3	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.6.3 requires verification that correct breaker alignment and indicated power are available to the required pump not in operation. LCO 3.4.6 allows a combination of reactor coolant pumps and RHR pumps. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps which are not in operation.	SR 3.4.6.3	4.4.1.3.2
3.4.7 M.1	CTS 3.4.1.3 states that two coolant loops must be OPERABLE in MODES 4 and 5 and one loop must be in operation. The coolant loops may be any combination of RCS loops and RHR loops. ITS 3.4.7 states that one RHR loop must be OPERABLE and in operation in MODE 5 and an additional loop, consisting of another OPERABLE RHR loop or a steam generator filled to at least 17%, must be available. This changes the CTS by requiring one RHR loop to be OPERABLE and in operation in MODE 5 when an RCS or RHR loop is allowed by the CTS. The change to RCS loop requirements is described in L.1.	3.4.7.b	3.4.1.3.
3.4.7 M.2	CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b , states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. ITS 3.4.7, Action A applies when one required RHR loop is inoperable and one RHR loop is OPERABLE and requires immediate action to restore the RHR or steam generator. ITS 3.4.7, Action B states that when one or more required SGs secondary side water levels are not within limits and one RHR loop is OPERABLE, action must be taken to restore a second RHR loop to OPERABLE status or to restore the SG secondary side water level within limit immediately. ITS 3.4.7, Action C, states that if no required RHR loops are OPERABLE or if the required RHR loop is not in operation, all operations cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1 be suspended and action must be immediately initiated to restore one RHR loop to OPERABLE status and operation. This changes the CTS by revising the actions to be taken if both RHR loops are inoperable. The change in the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 is described in DOC L.4.	3.4.7 Actions A, B and C	3.4.1.3 Actions a and b

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M.3	CTS 3.4.1.3 states that at least two coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by a note that states that all reactor coolant pumps and residual heat removal pumps may be de-energized for up to 1 hour. ITS 3.4.7 also allows the RHR pumps to be stopped for 1 hour, but limits the use of the 1 hour exception to once per 8 hour period.	3.4.7	3.4.1.3
3.4.7 M.4	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.7.3 requires verification that correct breaker alignment and indicated power are available to the required RHR pump not in operation. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation.	SR 3.4.7.3	4.4.1.3.2
3.4.8 M.1	CTS 3.4.1.3, Action a, states that when less than the two required coolant loops are OPERABLE, immediate action must be taken to return the required loops to OPERABLE status as soon as possible and the unit must be in cold shutdown within 20 hours. CTS 3.4.1.3, Action b , states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required coolant loop to operation. ITS 3.4.8, Action A applies when one required RHR loop is inoperable and requires immediate action to restore the RHR loop to OPERABLE status. ITS 3.4.8, Action B, states that if no required RHR loops are OPERABLE or the required RHR loop is not in operation, all operations involving a reduction in RCS boron concentration must be suspended and action must be immediately initiated to restore one RHR loop to OPERABLE status and operation. This changes the CTS by revising the actions to be taken if both RHR loops are inoperable from immediate initiation of corrective action to return the required loops to OPERABLE status to take immediate action to suspend RCS boron concentration reductions and restore an RHR loop to OPERABLE status and operation.	3.4.8 Actions A and B	3.4.1.3, Actions a and b
3.4.8 M.2	CTS 3.4.1.3 contains an allowance for all reactor coolant pumps or RHR pumps to be de-energized for up to one hour. ITS 3.4.8 allows all RHR pumps to be removed from operation for ≤ 15 minutes for switching from one loop to the other only and also requires that no draining operations to further reduce the RCS water volume are permitted.	3.4.8	3.4.1.3

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 M.3	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.8.3 requires verification that correct breaker alignment and indicated power are available to the required RHR pump not in operation. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps which are not in operation.	SR 3.4.8.3	4.4.1.3.2
3.4.9 M.1	ITS SR 3.4.9.2 requires verification that the capacity of the required groups of pressurizer heaters is ≥ 125 kW every 18 months. This requirement does not exist in the CTS.	SR 3.4.9.2	None
3.4.10 M.1	CTS 3.4.3.1, Action, states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in hot shutdown within 12 hours. ITS 3.4.10 states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in MODE 3 within 6 hours and in MODE 4 with any RCS cold leg temperature ≤ 235 °F (Unit 1), 270°F (Unit 2) within 12 hours. This changes the CTS by requiring the unit to be in MODE 3 in 6 hours. Other changes are discussed in DOC M.2.	3.4.10	3.4.3.1
3.4.10 M.2	CTS 3.4.3.1, Action, states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in hot shutdown within 12 hours. ITS 3.4.10 states that when one pressurizer safety valve is inoperable, it must be restored to OPERABLE status within 15 minutes or be in MODE 3 within 6 hours and in MODE 4 with any RCS cold leg temperature ≤ 235 °F (Unit 1), 270°F (Unit 2) within 24hours. This changes the CTS by requiring the unit to be in MODE 4 with any RCS cold leg temperature ≤ 235 °F (Unit 1), 270°F (Unit 2) in 24 hours instead of being required to be in MODE 4. Other changes are discussed in DOC M.1.	3.4.10	3.4.3.1
3.4.10 M.3	CTS 3.4.2 requires one pressurizer code safety valve to be OPERABLE in MODE 4. ITS 3.4.10 requires three pressurizer code safety valves to be OPERABLE in MODE 4 when all RCS cold leg temperatures > 235 °F (Unit 1), 270°F (Unit 2). This changes the CTS by requiring three safety valves to be OPERABLE in MODE 4.	3.4.10	3.4.2
3.4.11 M.1	CTS 4.4.3.2.1.b.2 requires operating the solenoid air control valves and check valves on the associated accumulators in the PORV control systems through one complete cycle of full travel every 18 months. ITS SR 3.4.11.4 requires performing a complete cycle of each solenoid control valve and check valve for the accumulators in the PORV control systems every 18 months. This changes the CTS by specifying that each solenoid control valve and check valve in the normal air and backup nitrogen PORV control systems must be tested every 18 months.	SR 3.4.11.4	4.4.3.2.1.b.2

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 M.2	CTS 3.4.3.2, Actions A.6 and B.3, state, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.4.11 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.4.3.2 Actions A.6 and B.3
3.4.12 M.1	CTS 3.4.9.3, Action f, states that the provisions of Specification 3.0.4 are not applicable. ITS 3.4.12 does not contain an equivalent Action, but SR 3.4.12.7 states that a COT must be performed on each required PORV, excluding actuation, and the SR is modified by a Note that states that the test is not required to be met until 12 hours after decreasing RCS cold leg temperature to ≤ 235°F (Unit 1), 270°F (Unit 2).	SR 3.4.12.7 Note	3.4.9.3 Action f
3.4.12 M.2	CTS 3.5.3, LCO Note #, states that a maximum of one charging pump and one low head safety injection pump shall be OPERABLE and capable of injecting into the RCS whenever the temperature of one or more of the RCS cold legs is less than or equal to 235°F (Unit 1), 270°F (Unit 2). The only exception to this requirement is two charging pumps may be OPERABLE and capable of injecting into the RCS during pump switch operation. There are no CTS Actions to be taken if these requirements are not met, so 3.0.3 would be entered. ITS LCO 3.4.12 contains the same requirements on the pumps, and Actions 3.4.12.A and 3.4.12.B state that if two LHSI pumps or two or more charging pumps, respectively, are capable of injection into the RCS, action must be initiated immediately to limit to a maximum of one LHSI pump and charging pump capable of injecting into the RCS.	LCO 3.4.12, 3.4.12 Actions A and B	3.5.3 Note "#"
3.4.12 M.3	CTS 3.5.3, LCO Note #, states that a maximum of one charging pump and one low head safety injection pump shall be OPERABLE and capable of injecting into the RCS whenever the temperature of one or more of the RCS cold legs is less than or equal to 235°F (Unit 1), 270°F (Unit 2). The only exception to this requirement is two charging pumps may be OPERABLE and capable of injecting into the RCS during pump switch operation. CTS SR 4.5.3.2 states that every 12 hours it must be verified that a maximum of one charging pump and one low head safety injection pump is OPERABLE and capable of injecting into the RCS whenever the temperature of one or more of the RCS cold legs is less than or equal to 235°F (Unit 1), 270°F (Unit 2). It is modified by a footnote that states that two charging pumps may be OPERABLE and capable of injecting into the RCS during pump switching operations. ITS LCO 3.4.12 states that a maximum of one charging pump and one LHSI pump may be capable of injecting into the RCS. ITS 3.4.12, LCO Note states that two charging pumps may be capable of injecting into the RCS during pump swap operation for ≤ 1 hour. This changes the CTS by limiting the amount of time that two charging pumps may be capable of injecting into the RCS for pump swap operations to ≤ 1 hour.	LCO 3.4.12, LCO 3.4.12 Note	3.5.3 Note "#", 4.5.3.2 Note "*"

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 M.4	The CTS LTOP specifications provide no limitations on the accumulators. ITS LCO 3.4.12 states that the LTOP system shall be OPERABLE and the accumulators shall be isolated with power removed from the accumulator isolation valve operators. The ITS LCO contains a Note which states, "Accumulator isolation is only required when accumulator pressure is greater than the PORV lift setting." ITS 3.4.12, Action C, states that if an accumulator is not isolated or power is available to an accumulator isolation valve operator when the accumulator pressure is greater than the PORV lift setting, the affected accumulator must be isolated immediately and power must be removed from the isolation valve operator within 1 hour. If this isolation is not accomplished, ITS 3.4.12, action D, states that the RCS cold leg temperature must be increased to above the LTOP arming temperature (235°F (Unit 1), 270°F (Unit 2)) or the affected accumulator must be depressurized to less than the PORV lift setting. Twelve hours is allowed for these actions. ITS SR 3.4.12.3 requires verification that each accumulator is isolated with power removed from the isolation valve operator every 12 hours.	LCO 3.4.12, LCO 3.4.12 Note, Actions C and D, and SR 3.4.12.3	None
3.4.13 None	N/A	N/A	N/A
3.4.14 M.1	The Unit 1 CTS does not require testing of RCS PIVs following actuation. ITS SR 3.4.14.1 contains a Frequency which requires RCS PIVs to be tested within 24 hours following valve actuation due to automatic or manual action or flow through the valve. SR 3.4.14.1, Note 3, states that such testing does not have to be performed more than once on valves if a repetitive testing loop cannot be avoided.	SR 3.4.14.1 and SR 3.4.14.1 Note 3	None
3.4.15 M.1	CTS 3.4.6.1 does not include an Action to analyze grab samples of the containment atmosphere if the required containment atmosphere radioactivity monitor is inoperable. ITS 3.4.15 Required Action B.1.1 states, "Analyze grab samples of the containment atmosphere." This changes CTS by adding a Required Action.	3.4.15 Action B.1.1	3.4.6.1
3.4.16 None	N/A	N/A	N/A
3.4.17 M.1	CTS 3.4.1.1 states that the reactor coolant loops must be in operation with power removed from the loop stop valve isolators in MODES 1 and 2. ITS 3.4.17 states that the loop isolation valves must be open with power removed from the isolation valve operators in MODES 1, 2, 3 and 4. This changes the CTS by requiring that the loop isolation valves be open with power removed from the loop operators in MODES 3 and 4 in addition to MODES 1 and 2.	3.4.17	3.4.1.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.17 M.2	CTS 3.4.1.1 states that the reactor coolant loops must be in operation with power removed from the loop stop valve operators in MODES 1 and 2. The action states that if less than the required reactor coolant loops are in operation, the unit must be in hot standby within 1 hour. ITS 3.4.17 states that if a loop isolation valve is closed, the valve must be maintained closed, the unit must be in MODE 3 within 6 hours and be in MODE 5 in 36 hours. The Condition is modified by a Note that states that all of the Required Actions must be completed whenever the condition is entered. The Actions are modified by a Note that states that separate condition entry is allowed for each RCS loop isolation valve.	3.4.17 and Notes	3.4.1.1
3.4.17 M.3	ITS 3.4.17.1 states, "Verify each RCS loop isolation valve is open," at a Frequency of once prior to removing power to the valve operator. CTS does not include an explicit requirement to verify each RCS loop isolation valve is open. This changes CTS by adding an explicit Surveillance Requirement to verify each RCS loop isolation valve is open.	3.4.17.1	None
3.4.18 M.1	CTS LCO 3.4.1.5 contains a Note which states, "A cold leg stop valve in a reactor coolant loop may be closed for up to two hours for valve maintenance or testing. If the stop valve is not opened within two hours, A.C. power shall be removed from the valve and the breaker locked open." ITS LCO 3.4.18 contains a Note which states, "A hot or cold leg isolation valve may be closed for up to two hours for valve maintenance or testing. If the isolation valve is not opened within 2 hours, the loop shall be isolated." This changes the CTS by expanding the application of the Note to either a hot or cold leg isolation valve and to require that the loop be isolated if the valve is not opened within two hours. The requirement to lock open the valve breaker is discussed in DOC L.3. The change to allow a hot or cold leg isolation valve to be opened is discussed in DOC M.2.	LCO 3.4.18 Note	3.4.1.5 Note
3.4.18 M.2	The CTS LCO 3.4.1.5 note allows a cold leg stop valve to be closed for up to two hours for maintenance or testing. The ITS LCO 3.4.18 Note allows a hot or cold leg isolation valve to be closed for maintenance or testing. This changes the CTS by placing a time limit on how long a hot leg isolation valve can be closed under the conditions of the Note.	LCO 3.4.18 Note	3.4.1.5 Note

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement
CTS 3.7.9.2 None	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 M.1	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, but does not include a time by which the unit must be placed in MODE 3. ITS 3.5.1, Action C.1 requires entry into MODE 3 within 6 hours. This changes the CTS by adding a 6 hour time limit to be in MODE 3.	3.5.1 Action C.1	3.5.1 Action a
3.5.2 M.1	CTS 3.5.2 Action a requires, when one ECCS subsystem is inoperable, the subsystem be restored to OPERABLE status within 72 hours or the unit be in HOT SHUTDOWN within the next 12 hours. ITS 3.5.2 Action A requires an inoperable ECCS train be returned to OPERABLE status in 72 hours. ITS 3.5.2 Action B requires the unit to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours if the Required Action and Completion Time for ITS Action A are not met. This changes the CTS by requiring entry into MODE 3 within 6 hours.	3.5.2 Actions A and B	3.5.2 Action a
3.5.2 M.2	CTS 3.5.2, Action c states that the provisions of Specification 3.0.4 are not applicable for one hour following heatup over 235 °F (270 °F Unit 2) or prior to cooldown below 235 °F (270 °F Unit 2). ITS 3.5.2 does not include this allowance.	None	3.5.2 Action c
3.5.2 M.3	ITS SR 3.5.2.3 requires verification that ECCS piping is sufficiently full of water every 92 days. CTS does not contain such a requirement. This changes the CTS by adding a Surveillance Requirement.	SR 3.5.2.3	None
3.5.2 M.4	Unit 1 CTS LCO 3.5.2 states that two independent ECCS subsystems shall be OPERABLE and an OPERABLE flow path must be capable of taking suction from the refueling water storage tank, the containment sump, or from the discharge of the outside recirculation spray pump. The ITS moves the details of what constitutes an OPERABLE subsystem to the Bases, but these details do not include the option to take suction from the discharge of the outside recirculation spray pump. This changes the CTS by eliminating the option of an OPERABLE ECCS subsystem taking suction from the discharge of an outside recirculation spray pump.	None	Unit 1 3.5.2

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.3 M.1	CTS 3.5.3, Action b applies when the required Low Head Safety Injection (LHSI) pump is inoperable. It directs that at least one ECCS subsystem be restored to OPERABLE status or RCS T_{avg} be maintained less than 350 °F by use of alternate heat removal methods. Action a applies to an ECCS train inoperable due to either the HHSI pump or the flow path from the refueling water storage tank. The ITS will not contain CTS 3.5.3 Action B and ITS 3.5.3 Action A will not include the exclusion regarding an ECCS inoperability due to the inoperability of either the HHSI pump or the flow path from the RWST, and will apply to all inoperabilities of the required ECCS train. This changes CTS by changing the Completion Time for a LHSI subsystem inoperable in MODE 4 from no specified time to restore OPERABILITY to one hour. In addition, the ITS requires that the plant be in MODE 5 within 24 hours when a LHSI subsystem is inoperable and not restored within 1 hour instead of remaining in MODE 4 as allowed by the CTS.	3.5.3 Action A	3.5.3 Actions a and b
3.5.4 None	N/A	N/A	N/A
3.5.5 None	N/A	N/A	N/A
3.5.6 None	N/A	N/A	N/A

Table M – More Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 M.1	CTS 3.6.1.6 Action states that if containment structural integrity does not meet specified requirements, the structural integrity must be restored to within limits within 24 hours. ITS 3.6.1 A.1 states that the containment shall be restored to OPERABLE status within 1 hour. This changes CTS by requiring the structural integrity aspect of containment OPERABILITY be restored to OPERABLE status within 1 hour instead of 24 hours.	3.6.1, Action A.1	3.6.1.6 Action
3.6.2 M.1	CTS 3.6.1.3.a.1 and CTS 3.6.1.3.b do not include a Completion Time for the action to maintain at least one containment air lock closed when a containment air lock door or a containment air lock is inoperable. ITS 3.6.2 Required Actions A.1, B.1, and C.2 require verifying the OPERABLE Containment air lock door closed in the affected air lock within 1 hour when the Conditions are entered. This changes CTS by specifying a Completion Time of 1 hour for verifying an OPERABLE air lock door is closed in an inoperable air lock.	3.6.2, Actions A.1, B.1, and C.2	3.6.1.3.a.1, 3.6.1.3.b
3.6.2 M.2	CTS 3.6.1.3 does not contain an Action to, "initiate action to evaluate overall containment leakage rate." ITS 3.6.2 Required Action C.1 requires initiation of action to evaluate overall containment leakage rate per ITS 3.6.1 immediately when one or more containment air locks are inoperable for reasons other than Condition A or B. This changes CTS by adding a new Required Action.	3.6.2 Action C.1	None
3.6.3 M.1	CTS 3.6.3.1 and CTS 3.6.5.1 do not contain a requirement to periodically verify an affected penetration flow path is isolated after it is isolated due to one inoperable containment isolation valve. ITS 3.6.3 Required Action A.2 requires the affected penetration flow path be verified isolated once per 31 days for isolation devices outside containment and prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment. ITS 3.6.3, Required Action C.2, requires the affected penetration flow path to be verified isolated every 31 days. ITS 3.6.3 Required Actions A.2 and C.2 include two NOTES. These NOTES allow isolation devices in high radiation areas and isolation devices that are locked, sealed, or otherwise secured to be verified by administrative means. This changes CTS by a adding new Required Actions to the Actions.	3.6.3, Actions A.2 and C.2	None
3.6.3 M.2	CTS 3.6.3.1 footnote "*" states, "Locked or sealed closed valves may be opened on an intermittent basis under administrative control." ITS 3.6.3 Action Note 1 states, " Penetration flow paths, except for 36 inch purge and exhaust valve, 18 inch containment vacuum breaking valve, 8 inch purge bypass valve, and steam jet air ejector suction flow paths, may be unisolated on an intermittent basis under administrative control." This changes CTS by not allowing the valves in the specified flow paths to be included as containment isolation valves allowed to be opened intermittently under administrative control. Changes associated with changing the reference from "Locked or sealed closed valves" to "Penetration flow paths" are addressed by DOC L.9.	3.6.3, Action Note 1	3.6.3.1, footnote *

Table M – More Restrictive Changes
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 M.3	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 within 1 hour or be in HOT SHUTDOWN within the next 12 hours." ITS 3.6.3 requires that with the Required Action and associated Completion Time for containment isolation valves not met, the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours. This changes CTS by requiring the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours, instead of only HOT SHUTDOWN (MODE 4) in 12 hours.	3.6.3, Action D	3.6.5.1 Action
3.6.4 None	N/A	N/A	N/A
3.6.5 None	N/A	N/A	N/A
3.6.6 None	N/A	N/A	N/A
3.6.7 M.1	CTS 3.6.2.2 Action a requires that if one containment recirculation spray subsystem is inoperable in one containment recirculation spray train, that the inoperable subsystem be restored to OPERABLE status within 7 days. If this is not accomplished, the unit is to be placed in at least HOT STANDBY within the next 6 hours. The inoperable subsystem is then to be restored to OPERABLE status within the next 48 hours, or be in COLD SHUTDOWN within the next 30 hours. ITS Required Action E.2 requires that if the Required Action and associated Completion Time is not met, that the unit be placed in MODE 5 within 84 hours. This changes CTS by declaring the time for commencement of shutdown to MODE 5 earlier in the sequence of Required Actions.	3.6.7, Action E.2	3.6.2.2 Action A
3.6.8 M.1	CTS 3.6.2.3 Action requires that if the chemical addition system is inoperable, that the inoperable system be restored to OPERABLE status within 72 hours. If this is not accomplished, the unit is to be placed in at least HOT STANDBY within the next 6 hours. The inoperable system is then to be restored to OPERABLE status within the next 48 hours, or be in COLD SHUTDOWN within the following 30 hours. ITS Required Action B.2 requires that if the Required Action and associated Completion Time is not met, that the unit be placed in MODE 5 within 84 hours. This changes CTS by declaring the time for commencement of shutdown to MODE 5 earlier in the sequence of Required Actions.	3.6.8, Action B.2	3.6.2.3 Action
3.6.9 M.1	CTS 3.6.4.2, Action b states, "The provisions of Specification 3.0.4 are not applicable." ITS LCO 3.6.9 does not contain a similar allowance. This changes the CTS by eliminating an explicit Specification 3.0.4 exception.	None	3.6.4.2, Action b

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 M.1	CTS 3.7.1.1 states that the provisions of Specification 3.0.4 are not applicable. ITS 3.7.1 does not contain an exception to LCO 3.0.4. However, ITS SR 3.7.1.1 contains a Note which states, "Only required to be performed in MODES 1 and 2." This changes the CTS by eliminating a general exception to 3.0.4 with a specific exception to allow entry into MODES in the Applicability to allow performance of a Surveillance.	SR 3.7.1.1 Note	3.7.1.1
3.7.1 M.2	CTS 3.7.1.1 Action a states, in part, that if an inoperable main steam safety valve is not restored to OPERABLE status or the power range neutron flux high setpoint is not reduced to the specified value within 4 hours, then the unit must be placed in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours. ITS 3.7.1 Action C states that if the Required Actions and associated Completion Times are not met, or if one or more steam generators have ≥ 4 MSSV inoperable, the unit must be placed in Mode 3 within 6 hours and Mode 4 within 12 hours. This changes the CTS by providing specific actions for one or more steam generators with ≥ 4 MSSVs inoperable and requiring the unit to be in MODE 4 within 12 hours instead of COLD SHUTDOWN (MODE 5) within 36 hours.	3.7.1 Action C	3.7.1.1 Action a
3.7.2 M.1	CTS 3.7.1.5 ACTIONS for MODES 2 and 3 states subsequent operation in MODES 1, 2, or 3 may proceed provided the inoperable MSTV is maintained closed. If the valve is not maintained closed, the unit must be in HOT SHUTDOWN (MODE 3) within the next 12 hours. ITS 3.7.2 Required Actions C.1 requires an inoperable MSTV to be closed within 8 hours and Required Action C.2 requires the valve to be verified closed once per 7 days. Otherwise, Action D requires the unit must be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by specifying a time within which the inoperable MSTV must be closed (8 hours), requiring periodic verification that the inoperable MSTV is closed, requiring the unit to be in MODE 3 within 6 hours if the Required Actions and Associated Completion Times are not met, and requiring the unit to be in MODE 4 within 12 hours if the Required Actions and associated Completion Times are not met.	3.7.2 Actions C and D	3.7.1.5
3.7.2 M.2	The CTS does not require testing to verify that the MSTV close on an actuation signal. ITS SR 3.7.2.2 requires verification that each MSTV actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by requiring verification that each MSTV actuates to the isolation position on an actual or simulated actuation signal.	SR 3.7.2.2	None

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 M.3	CTS 3.7.1.5, Actions for MODES 2 and 3, allows continued operation in MODES 1, 2, or 3 with an inoperable, closed MSTV and states that the provisions of specification 3.0.4 are not applicable. The specification 3.0.4 exception allows MODE transitions while relying on the CTS 3.7.1.5 Action. ITS 3.7.2, Action C, applies with one or more MSTVs inoperable and does not allow operation in MODE 1 and does not provide an exception to ITS LCO 3.0.4, so MODE transition to MODE 1 is not allowed. This changes the CTS by not allowing operation in MODE 1 with an inoperable, closed MSTV.	3.7.2 Action C	3.7.1.5 Actions
3.7.2 M.4	CTS 3.7.1.5 ACTION for MODE 1 specifies that POWER OPERATION may continue when one MSTV is inoperable if the inoperable valve is restored to OPERABLE status or closed within 4 hours. ITS 3.7.2 ACTION A requires restoring the inoperable valve to OPERABLE status within 8 hours. The ITS does not provide any allowance for continued operation by closing the valve while in MODE 1. This changes the CTS by deleting the allowance for continued operation in MODE 1 with a closed, inoperable MSTV.	None	3.7.1.5 Actions
3.7.2 M.5	CTS 3.7.1.5 Actions requires that when one main steam trip valve is inoperable in MODE 1, the valve is to be restored to Operable status within 4 hours or the unit is to be in MODE 3 within the next 12 hours. ITS Action A allows 8 hours to restore an inoperable main steam trip valve to OPERABLE status when in MODE 1, and an additional 6 hours to be in MODE 3. This changes the CTS allowed outage time to be in MODE 3 with an inoperable MSTV from 16 hours to 14 hours. The change in time from 4 hours to 8 hours to restore an inoperable MSTV is discussed in DOC L.2.	3.7.2 Action A	3.7.1.5 Actions
3.7.3 M.1	CTS does not have any requirement for Main Feedwater Isolation Valves (MFIVs), Main Feedwater Pump Discharge Valves (MFPDVs), Main Feedwater Regulating Valves (MFRVs) and Main Feedwater Regulating Bypass Valves to be OPERABLE, other than a requirement for an actuation signal to be supplied to the valves in CTS 3.3.2.1. ITS 3.7.3 requires the MFIVs, MFPDVs, MFRVs, and MFRBVs be OPERABLE in MODES 1, 2, and 3. This changes the CTS by incorporating the requirements of ITS 3.7.3.	3.7.3	None
3.7.4 M.1	CTS does not have any Technical Specification requirements for atmospheric dump valves. ITS 3.7.4 specifies the requirements for the "Steam Generator Power Operated Relief Valves," SGPORVs, consistent with the requirements of ISTS 3.7.4, "Atmospheric Dump Valves." This changes the CTS by incorporating the requirements of ITS 3.7.4.	3.7.4	None

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M.1	CTS LCO 3.7.1.2 is applicable in Modes 1, 2, and 3. ITS LCO 3.7.5 is applicable in Modes 1, 2, and 3, and MODE 4 when the steam generator is relied upon for heat removal for the system. To support this change in the Applicability, the following additional requirements are added to the CTS: • A note is added to the LCO that requires an AFW train, supported by a motor driven pump, to be operable in MODE 4; • A new ACTION E is added which requires an immediate action to restore a required inoperable AFW train to OPERABLE status when the SG is required in MODE 4; and • The addition of Notes to ITS SRs 3.7.5.3 and 3.7.5.4 . which state the requirements are not applicable in MODE 4 when a steam generator is relied upon for heat removal.	3.7.5	3.7.1.2
3.7.6 M.1	The CTS requirements on the ECST are applicable in MODES 1, 2, and 3. ITS 3.7.6 is applicable in MODES 1, 2, and 3, and in addition, MODE 4 when a SG is relied upon for heat removal. Consistent with this change in applicability, the phrase "Be in MODE 4, without reliance on steam generator for heat removal" is added to ITS ACTION B. This changes the CTS requirements by requiring the ECST to be OPERABLE in MODE 4 when a SG is relied upon for heat removal.	3.7.6 Applicability	3.7.1.3 Applicability
3.7.6 M.2	CTS ACTION b requires the plant must be in HOT SHUTDOWN within the next twelve hours if the ECST is inoperable for seven days. ITS Action B states "Required Action and associated Completion Time not met, be in MODE 3 within six hours and MODE 4 within 24 hours." This changes the CTS to require the plant to be in MODE 3 within six hours. The change in the time to reach MODE 4 is discussed in DOC L.1.	3.7.6 Action B	3.7.1.3 Action b
3.7.7 M.1	CTS Table 4.7-1 item #2 allows the sampling frequency for the DOSE EQUIVALENT I-131 to be extended to once per 6 months whenever the gross activity determination indicates the iodine concentrations are below 10% of the allowable limits. ITS SR 3.7.7.1 does not provide for this extended time frame for determining the DOSE EQUIVALENT I-131 and requires verification of specific activity of the secondary coolant every 31 days whenever the unit is in MODES 1, 2, 3, and 4. This changes the CTS by deleting CTS Table 4.7-1, item 2.b, and the qualifying statement of, "whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit."	SR 3.7.7.1	Table 4.7-1, Item 2
3.7.8 M.1	CTS 4.7.4.1 does not contain a requirement to verify each SW System pump starts automatically on an actuation signal. ITS SR 3.7.8.3 states, "Verify each SW pump starts automatically on an actual or simulated actuation signal." This changes the CTS by adding a SR to test the SW Systems pumps.	SR 3.7.8.3	None

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.9 None	N/A	N/A	N/A
3.7.10 M.1	CTS 3.7.7.1 requires the emergency ventilation system to be OPERABLE. ITS 3.7.10 states, "The following MCR/ESGR EVS trains shall be OPERABLE: a. Two MCR/ESGR Emergency Ventilation System (EVS) trains; and b. One MCR/ESGR EVS train on the other unit." This changes CTS by specifying the number and type of MCR/ESGR EVS trains required to be OPERABLE.	3.7.10	3.7.7.1
3.7.10 M.2	CTS 3.7.7.1 Action a states, "With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days..." ITS 3.7.10 Condition A states, "One required LCO 3.7.10.a or 3.7.10.b MCR/ESGR EVS train inoperable." ITS Required Action A.1 states, "Restore train to OPERABLE status," within 7 days. This changes CTS by allowing only one required train of the MCR/ESGR EVS to be inoperable for 7 days, but not allowing the entire MCR/ESGR EVS to be inoperable for 7 days.	3.7.10 Action A	3.7.7.1 Action a
3.7.10 M.3	CTS 3.7.7.1 Action b states, "With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.7.10 Required Action B.1 requires that with two or more required LCO 3.7.10.a or LCO 3.7.10.b MCR/ESGR EVS trains inoperable due to an inoperable MSR/ESGR boundary in MODE 1, 2, 3, or 4, restore the MCR/ESGR boundary to OPERABLE status within 24 hours. The Bases for Required Action B.1 state, "During the period that the MCR/ESGR boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition." ITS 3.7.10 Condition C requires that if the Required Actions and associated Completion Time of Condition A or B are not met, the unit be in MODE 3 in 6 hours, and MODE 5 in 36 hours. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes CTS by not providing a Completion time of 24 hours when the two or more required MCR/ESGR EVS trains and two or more required MCR/ESGR bottled air trains are inoperable at the same time, except for an inoperable MCR/ESGR boundary. This also changes CTS by requiring compensatory measures be taken while the MCR/ESGR boundary is inoperable. This results in allowing 23 fewer hours to place the unit in MODE 3 and MODE 5, and requires additional compensatory actions be taken.	3.7.10 Actions B and C, LCO 3.0.3	3.7.7.1 Action b

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.10 M.4	CTS 3.7.7.1 Action a states, "With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days..." ITS 3.7.10 Required Action D.1 requires that with two or more required LCO 3.7.10.a or LCO 3.7.10.b MCR/ESGR EVS trains inoperable for reasons other than Condition B, enter LCO 3.0.3 immediately. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes CTS by not providing a Completion time of 7 days when the two or more required MCR/ESGR EVS trains are inoperable resulting in less time allowed to place the unit in MODE 3 and MODE 5.	3.7.10 Action D, LCO 3.0.3	3.7.7.1 Action a
3.7.10 M.5	CTS 4.7.7.1 states, "Each control room emergency ventilation system shall be demonstrated OPERABLE:...d. At least once per 18 months by:...2. Verifying that the normal air supply and exhaust are automatically shutdown on a Safety Injection Actuation Test Signal." ITS SR 3.7.10.3 states, "Verify each LCO 3.7.10.a MCR/ESGR EVS train actuates on an actual or simulated actuation signal." The Frequency is every 18 months. This changes CTS by requiring verification of automatic actuation of each LCO 3.7.10.a MCR/ESGR EVS train on an actual or simulated actuation signal. The change moving details of how the test is performed are addressed in a removed detail discussion of change.	SR 3.7.10.3	4.7.7.1
3.7.10 M.6	CTS 4.7.7.1.d.3 uses a reference of "outside atmosphere" with regard to the pressure at which the emergency ventilation system must maintain the control room. ITS SR 3.7.10.4 uses the reference "adjacent areas." This changes the reference used when determining whether the MCR/ESGR envelope has been sufficiently pressurized to a more specific reference.	SR 3.7.10.4	4.7.7.1.d.3
3.7.10 M.7	CTS 4.7.7.1.d.3 specifies positive pressure and flow requirements that must be met by the control room emergency ventilation system. ITS SR 3.7.10.4 states the positive pressure and flow requirements that must be met by each required train of the MCR/ESGR EVS. This changes the CTS by specifying that the each required train of the MCR/ESGR EVS must be capable of performing the specified Surveillance Requirement.	SR 3.7.10.4	4.7.7.1.d.3
3.7.11 M.1	ITS 3.7.11 Applicability includes, "During movement of recently irradiated fuel assemblies." ITS 3.7.11 Condition C is entered when the Required Action and associated Completion Time of Condition A is not met during movement of recently irradiated fuel assemblies. The Required Actions require either placing an OPERABLE MCR/ESGR ACS subsystem in operation or suspending movement of recently irradiated fuel assemblies. Condition D is entered when less than 100% of the MCR/ESGR ACS cooling equivalent to a single OPERABLE MCR/ESGR ACS subsystem is available during movement of recently irradiated fuel. Required Action D.1 requires suspending movement of recently irradiated fuel assemblies immediately. This changes CTS by adding an additional Applicability criteria and associated Conditions and Required Actions.	3.7.11 Applicability and Actions	None

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.11 M.2	CTS 4.7.7.3 states, "Each control room air-conditioning system shall be demonstrated OPERABLE at least once per 12 hours by verifying that the control room air temperature is less than or equal to 120°F." ITS SR 3.7.11.1 states, "Verify each MCR/ESGR ACS chiller has the capability to remove the design heat load." The Frequency is every 18 months on a STAGGERED TEST BASIS. This changes CTS by replacing a temperature verification with a test to verify each MCR/ESGR ACS chiller has the capability to remove the design heat load.	SR 3.7.11.1	4.7.7.3
3.7.11 M.3	CTS 3.7.7.1 Action d states, "With both the air conditioning systems inoperable, restore at least one system to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS 3.7.11 Condition E states that with less than 100% of the MCR/ESGR ACS cooling equivalent to a single OPERABLE MCR/ESGR ACS subsystem available in MODES 1, 2, 3, or 4, enter LCO 3.0.3 immediately. ITS LCO 3.0.3 allows 7 hours to place the unit in MODE 3, and 37 hours to place the unit in MODE 5. This changes the CTS by allowing 23 hours less to place the unit in MODE 3 and MODE 5 if the equivalent of one MCR/ESGR ACS subsystem is not available. The change in the criteria for the systems is addressed in another more restrictive discussion of change.	3.7.11 Action E and LCO 3.0.3	3.7.7.1 Action d
3.7.12 M.1	CTS LCO 3.7.8.1 states, "Two safeguards area ventilation systems (SAVS) shall be OPERABLE with: a. one SAVS exhaust fan b. one auxiliary building HEPA filter and charcoal adsorber assembly (shared with Unit 2)." In the Unit 2 CTS, the reference to the other unit states, "(shared with Unit 1)." CTS ACTION addresses the inoperability of one SAVS. CTS 4.7.8.1 states, "Each SAVS system shall be demonstrated OPERABLE." CTS 4.7.8.1.a.1 requires, "...verifying that the SAVS operates for at least 10 hours with the heater on." ITS 3.7.12 states, "Two ECCS PREACS trains shall be OPERABLE." ITS Condition A addresses the inoperability of one ECCS PREACS train. ITS SR 3.7.12.1 and SR 3.7.12.2 require the respective surveillances be performed on each ECCS PREACS train. This changes CTS by applying the requirements to all the components that constitute an ECCS PREACS train, rather than just the SAVS.	3.7.12 and SRs 3.7.12.1 and 3.7.12.2	3.7.8.1 and 4.7.8.1

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.12 M.2	ITS SR 3.7.12.5 states, "Verify one ECCS PREACS train can maintain a negative pressure relative to atmospheric pressure during the post accident mode of operation." The Frequency is 18 months on a STAGGERED TEST BASIS. ITS LCO 3.7.12 includes a NOTE that states, "The ECCS pump room boundary openings not open by design may be opened intermittently under administrative control." ITS Required Action B.1 requires that when two ECCS PREACS trains are inoperable due to an inoperable ECCS pump room boundary, that the ECCS pump room boundary be restored to OPERABLE status within 24 hours. This changes CTS by adding a requirement that equipment be able to provide a negative pressure relative to atmospheric pressure for the required ECCS PREACS areas. The ITS LCO 3.7.12 NOTE states allowed exceptions to the requirements of ITS SR 3.7.12.5. The ITS Required Action B.1 provides a 24 hour Completion Time in case two ECCS PREACS trains are inoperable due to an inoperable ECCS pump room boundary.	3.7.12.5	None
3.7.13 M.1	CTS 3.7.7.1 requires the bottled air pressurization system to be OPERABLE. ITS 3.7.13 states, "Three MCR/ESGR bottled air system trains shall be OPERABLE." This changes CTS by specifying the number of MCR/ESGR bottled air system trains required to be OPERABLE.	3.7.13	3.7.7.1
3.7.13 M.2	CTS 3.7.7.1 Action a states, "With either the emergency ventilation system or the bottled air pressurization system inoperable, restore the inoperable system to OPERABLE status within 7 days..." CTS 3.7.7.1 Action b states, "With both the emergency ventilation system and the bottled air pressurization system inoperable, restore at least one of these systems to OPERABLE status within 24 hours." ITS 3.7.13 Condition A states, "One required MCR/ESGR bottled air system train inoperable." ITS Required Action A.1 states, "Restore train to OPERABLE status," within 7 days. ITS 3.7.13 Required Action C.1 is added, allowing 24 hours to restore at least two MCR/ESGR bottled air system trains to OPERABLE status if two or more required trains are inoperable for reasons other than an inoperable MCR/ESGR boundary. The Bases for Required Action C.1 state, "During the period that two or more required trains of the MCR/ESGR bottled air system are inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition." This changes CTS by allowing only one required train of the MCR/ESGR EVS and MCR/ESGR bottled air system to be inoperable for 7 days, and allowing two or more required trains of the MCR/ESGR bottled air system to be inoperable for any reason for 24 hours instead of 7 days. This also changes CTS by requiring compensatory measures be taken while two or more trains of the MCR/ESGR bottled air system are inoperable. Not allowing both the MCR/ESGR EVS and MCR/ESGR bottled air system to be inoperable concurrently for 24 hours except for an inoperable MCR/ESGR boundary is addressed by DOC M.3.	3.7.13 Actions A and C	3.7.7.1 Actions a and b

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.1	CTS 3.8.1.1 Actions would allow the LCO to not be met for an indefinite period of time, as long as the allowed outage time of each individual Action is not exceeded. For example, an EDG may be inoperable for a period of 14 days. During the allowed time, an offsite circuit may become inoperable. This would require a 12-hour action to be entered, until either the EDG or offsite circuit is restored to OPERABLE status. The restoration of either the EDG or offsite circuit is allowed within the CTS Actions for an unlimited period of time. This could allow the LCO to not be met for a period that could exceed many weeks. ITS Required Actions A.3 and B.4 require the restoration of all required features within 17 days from discovery of failure to meet the LCO. This changes the CTS by limiting the total time that any combination of offsite circuits and EDGs may be inoperable to a total of 17 days.	3.8.1, Required Actions A.3 and B.4	3.8.1.1 Actions
3.8.1 M.2	CTS requirement 4.8.1.1.2 for the EDG day tank does not require a periodic surveillance to monitor the fuel oil tank for water. ITS SR 3.8.1.5 requires each EDG's day tank be checked and any accumulated water removed at a Frequency of every 92 days. This changes the CTS by adding an additional Surveillance Requirement.	SR 3.8.1.5	None
3.8.1 M.3	CTS Surveillance Requirement 4.8.1.1.2.d.8 requires that the EDG must be capable of transferring loads to and from offsite electrical source. Once the capability has been demonstrated, in part c) the EDG may, "proceed through its shutdown sequence." ITS SR 3.8.1.15 verifies the capability of the EDG to transfer loads from and to the offsite electrical source. The SR requires in part c that the EDG, "Returns to ready-to-load operation." This changes the CTS by stating that the EDG is capable of re-powering the emergency bus by being returned to the ready-to-load condition.	SR 3.8.1.15	4.8.1.1.2.d.8
3.8.1 M.4	CTS requirement 4.8.1.1.2.d.4 verifies that on an ESF signal without the loss of offsite power, the EDG starts in ≤ 10 seconds with voltage ≥ 3960 V and frequency ≥ 59.5 Hz and operates in a standby condition ≥ 5 minutes. The steady state voltage and frequency are required to be ≥ 3740 and ≤ 4580 volts and ≥ 59.5 and ≤ 60.5 Hz. ITS SR 3.8.1.11 states the EDG will start in ≤ 10 seconds with voltage ≥ 3960 V and frequency ≥ 59.5 Hz and operates in a standby condition ≥ 5 minutes. The steady state voltage and frequency are required to be ≥ 3740 to ≤ 4580 volts and ≥ 59.5 to ≤ 60.5 Hz. The ITS also requires verification that each permanently connected load remains energized from the offsite electrical power system and emergency loads are energized or auto-connected through the sequencing timing relays are energized from the offsite electrical power system. This changes the CTS by requiring the verification of permanently connected loads and auto-connected loads, through their sequencing timing relays, remain energized from offsite circuits.	SR 3.8.1.11	4.8.1.1.2.d.4

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 M.1	CTS Table 4.8-3 notes (1) and (2) require specific actions for Category A and B parameters not within limits. Note 1 states, "For any Category A parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that within 24 hours all the Category B measurements are taken and found to be within their allowable values, and provided all Category A and B parameter(s) are restored to within limits within the next six days." Note 2 states, "For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are within their allowable limits and restored to within Category B limits within 7 days." ITS 3.8.6 Condition A states, "One or more station or EDG batteries with one or more battery cell parameters not within Table 3.8.6-1 Category A or B limits." If this condition is entered, the Required Actions A.1 requires the verification of pilot cells electrolyte level and float voltage meet Table 3.8.6–1 Category C limits within 1 hour. This changes the CTS by specifying a time of one hour to verify pilot cell electrolyte level and voltage are within limits.	3.8.6, Condition A	3Table 4.8-3, Notes (1) and (2)
3.8.6 M.2	CTS surveillance requirements 4.8.2.3.2.b and 4.8.1.1.3.b state that within 7 days after a battery discharge below 110 volts or an overcharge above 150 volts, that the battery parameters in Table 4.8-3 meet the Category B limits. ITS SR 3.8.6.2 requires that the Station and EDG battery cell parameters be verified to meet Table 3.8.6 – 1 Category B limits every 92 days and once within 24 hours after a battery overcharge to > 150 volts or discharge to < 110 volts. This changes the CTS requirement by requiring the Category B limits are verified within 24 hours where the current requirements allow 7 days.	SR 3.8.6.2	4.8.2.3.2.b, 4.8.1.1.3.b
3.8.6 M.3	CTS Surveillance Requirements 4.8.2.3.2.b for the station batteries and 4.8.1.1.3 for the EDG batteries specify that after an overcharge or a discharge of a battery, the parameters of the Category B limits must be met. The Category B parameters of electrolyte level, float voltage, and specific gravity are listed in Table 4.8–3, and require specific values to be met. The specific gravity limits for Category A and Category B allowable value specify that Note (b) is applicable for the station batteries. Note (b) states, "Or battery charging current is less that 12 amps when on charge (station batteries only)." ITS SR 3.8.6.2 requires verification that the station and EDG Category B battery cell parameters are within limits after a battery overcharge or discharge. The Category B limits listed in Table 3.8.6 – 1 are electrolyte level, float voltage, and specific gravity. Notes (b) and (c) modify the specific gravity requirements. In part, these notes allow a battery charging on float current of less than 2 amps to substitute for direct specific gravity readings for the station and EDG batteries. This changes the CTS requirements by allowing the substitution of charging current of less than 2 amps instead of 12 amps to substitute for specific gravity readings.	SR 3.8.6.2, Table 3.8.6-1	4.8.2.3.2.b, 4.8.1.1.3, Table 4.8-3, Note (b)

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 M.1	CTS LCO 3.8.2.1 footnote states, "Two inverters may be disconnected from their D.C. Busses for up to 24 hours as necessary, for the purpose of performing an equalizing charge on their associated batteries provided (1) their vital busses are energized, and (2) the remaining vital busses are energized from their associated inverters and connected to their associated D.C. Busses." ITS LCO 3.8.7 Note states, "One inverter may be disconnected from its associated DC bus for ≤ 24 hours to perform an equalizing charge on its associated battery, provided: a. The associated AC vital bus is energized from its constant voltage source transformer; and b. All other AC vital buses are energized from their associated OPERABLE inverters." This changes the CTS by only allowing one inverter to be disconnected and requiring the associated AC bus to be powered from "its constant voltage source transformer."	LCO 3.8.7 Note	LCO 3.8.2.1 footnote
3.8.7 M.2	CTS 4.8.2.1 states the specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.7.1 requires the verification of the correct inverter voltage to required AC vital buses every 7 days. This changes the CTS by requiring the verification of the correct inverter voltage to the required AC vital buses, where the CTS only requires verification of indicated power.	SR 3.8.7.1	4.8.2.1
3.8.8 M.1	CTS 4.8.2.2.1 states the specified busses shall be energized in the required manner once per 7 days by verifying indicated power availability. ITS SR 3.8.8.1 requires the verification of the correct inverter voltage to required AC vital buses every 7 days. This changes the CTS by requiring the verification of the correct inverter voltage to the required AC vital buses, where the CTS only requires verification of indicated power.	SR 3.8.8.1	4.8.2.2.1
3.8.9 M.1	CTS 3.8.2.1 Action a. states that with one of the required A.C. emergency busses not fully energized, re-energize the bus within 8 hours. Action b. states within one A.C. Vital Bus not energized, re-energize the A. C. Vital bus within 2 hours. CTS 3.8.2.3 Action a states with one 125 VDC bus inoperable, restore the inoperable bus to OPERABLE status within 2 hours. ITS 3.8.9, Action A, states that with one or more AC subsystems inoperable, restore the subsystem(s) to OPERABLE status within 8 hours and 16 hours from discovery of failure to meet LCO. Action B states that with one or more AC vital buses inoperable, restore the AC bus subsystem(s) to OPERABLE status within 2 hours and 16 hours from discovery of failure to meet LCO. Action C states that with one or more DC vital buses inoperable, restore the DC bus(es) to OPERABLE status within 2 hours and 16 hours from discovery of failure to meet LCO. This changes the CTS by placing a limit of 16 hours for failing to meet the LCO when the CTS does not specify a limit.	3.8.9, ACTIONS A, B, and C	3.8.2.1, Actions a and b, 3.8.2.3, Action a

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 M.2	CTS 4.8.2.1 states the specified A.C. busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. CTS 4.8.2.3.1 states that each D.C. bus train shall be demonstrated OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.9.1 requires the verification of the correct voltage to required AC, DC, and AC vital buses electrical power distribution subsystems every 7 days. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and AC vital buses electrical power distribution subsystems, where the CTS only requires verification of indicated power.	SR 3.8.9.1	4.8.2.1, 4.8.2.3.1
3.8.10 M.1	CTS 4.8.2.2.1 states the specified busses shall be determined OPERABLE at least once per 7 days by verifying indicated power availability. ITS SR 3.8.10.1 requires the verification of the correct voltage to required AC, DC, and AC vital buses electrical power distribution subsystems every 7 days. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and AC vital buses electrical power distribution subsystems, where the CTS only requires verification of indicated power.	SR 3.8.10.1	4.8.2.2.1

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
3.9.1None	N/A	N/A	N/A
3.9.2 M.1	Unit 1 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position in MODE 6, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, and the valves must be locked, sealed, or secured in the closed position within 15 minutes. Unit 2 CTS 3.1.1.3.2 states that when the primary grade water flow path isolation valves are not locked, sealed, or otherwise secured in the closed position, all operations involving positive reactivity changes or CORE ALTERATIONS must be suspended, the isolation valves must be locked, sealed, or otherwise secured in the closed position within 15 minutes, and SHUTDOWN MARGIN must be verified greater than or equal to 1.77% Δk/k within 60 minutes. ITS 3.9.2 Actions state than when one or more valves are not secured in the closed position, CORE ALTERATIONS must be suspended immediately, the primary grade water flow paths must be isolated within 15 minutes and the boron concentration must be verified per SR 3.9.1.1 within 4 hours. This changes the Unit 1 CTS by adding a requirement to verify the RCS boron concentration within 4 hours and by changing the shutdown margin requirement from 1.77%Δk/k to a reference to SR 3.9.1.1 and changes the Unit 1 and Unit 2 CTS by adding a Note requiring performance of the SHUTDOWN MARGIN determination whenever a primary grade water flow path isolation valve is inadvertently opened.	3.9.2 ACTIONS	3.1.1.3.2
3.9.3 M.1	CTS LCO 3.9.2 Action requires with less than two source range channels OPERABLE, immediate suspension of all operations involving CORE ALTERATIONS or positive reactivity changes. Unit 2 CTS in LCO 3.9.2 requires that if both monitors are inoperable, the RCS boron concentration be verified every 12 hours. ITS 3.9.3 Action A requires with one source range neutron flux monitor inoperable, CORE ALTERATIONS and reactivity changes shall be suspended immediately, "that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1." ITS Action B states with two source range neutron flux monitors inoperable, initiate action immediately to restore one to OPERABLE and perform a verification of refueling boron concentration once per 12 hours. This changes the Unit 1 CTS requirements by requiring a verification of boron concentration every 12 hours when both source ranges are inoperable and the Unit 1 and Unit 2 CTS by requiring immediate initiation action to restore one source range to OPERABLE status.	3.9.3 Action A and B	LCO 3.9.2
3.9.3 M.2	CTS Surveillance Requirement 4.9.2 specifies testing for the source range instrumentation channels. ITS SR 3.9.3.2 requires the performance of a CHANNEL CALIBRATION to be performed on the source range monitors every 18 months. This changes the CTS by requiring a CHANNEL CALIBRATION every 18 months on each source range monitor.	SR 3.9.3.2	4.9.2
3.9.3 M.3	Unit 1 CTS 4.9.2 requires a CHANNEL CHECK to be performed once per 12 hours during CORE	SR 3.9.3.1	4.9.2

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
	ALTERATIONS. ITS SR 3.9.3.1 requires a CHANNEL CHECK to be performed every 12 hours. This changes the Unit 1 CTS by requiring the CHANNEL CHECK to be performed every 12 hours even if CORE ALTERATIONS are not in progress.		
3.9.3 M.4	CTS 3.9.2 states, in part, that, " two source range neutron flux monitors shall be operating." ITS 3.9.3 states, "Two source range neutron flux monitors shall be OPERABLE." This changes the CTS by requiring the source range neutron flux monitors to be OPERABLE, instead of just operating.	3.9.3	3.9.2
3.9.4None	N/A	N/A	N/A
3.9.5 M.1	CTS 3.9.8.1, Action c., states that the RHR loop may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. ITS LCO 3.9.5 Notes states that the required RHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than required to meet the minimum required boron concentration of LCO 3.9.1. This results in two changes to the CTS. First, the allowance to remove RHR from operation is no longer restricted to CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. Second, the use of the allowance in the ITS is predicated on prohibiting operations that will cause introduction into the RCS, coolant with a boron concentration less than required to meet the boron concentration of LCO 3.9.1.	LCO 3.9.5 Notes	3.9.8.1, Action c
3.9.5 M.2	CTS Surveillance 4.9.8.1.2 states that one RHR loop must be verified to be in operation and a. if the RCS temperature is > 140 °F or the time since entry into MODE 3 is < 100 hours, circulating reactor coolant at a flow rate ≥ 3000 gpm, or b. if the RCS temperature is ≤ 140 °F or the time since entry into MODE 3 is ≥ 100 hours, circulating reactor coolant at a flow rate ≥ 2000 gpm. ITS SR 3.9.5.1 requires verification that one RHR loop is in operation and circulating reactor coolant at a flow rate of ≥ 3000 gpm. This changes the CTS by eliminating the option to reduce RHR flow to 2000 gpm when RCS temperature is ≤ 140 °F or the time since entry into MODE 3 is < 100 hours.	SR 3.9.5.1	4.9.8.1.2
3.9.6 M.1	CTS 3.9.8.2 requires two independent RHR loops to be OPERABLE and at least one loop to be in operation. ITS SR 3.9.6.2 requires verification every seven days of correct breaker alignment and that indicated power is available to the RHR pump not in operation. A Note states that the Surveillance Requirement is not required to be performed until 24 hours after a required RHR pump is not in operation. This changes the CTS by adding a Surveillance Requirement.	SR 3.9.6.2	3.9.8.2
3.9.7 M.1	CTS 3.9.10.1 Action states that with the reactor vessel water level not within limit, suspend movement of fuel assemblies within the reactor pressure vessel. ITS 3.9.7 states with the refueling cavity water level not within limit, suspend movement of irradiated fuel assemblies within containment. This change the CTS by expanding the suspension of movement of fuel assemblies from within the reactor pressure	LCO 3.9.7	3.9.10.1

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
	vessel to within the containment.		

Table M – More Restrictive Changes
ITS Section 4.0 – Design Features

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
4.0 M.1	ITS 4.3.1.2.b states that the new fuel storage racks must be designed and maintained with the $K_{eff} \leq 0.95$ if fully flooded with unborated water. The CTS does not contain this information.	4.3.1.2.b	None

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.1	ITS 5.1.1 states, "The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety." The CTS does not include such a statement. This changes the CTS by adding a required action for the plant manager or his designee.	5.5.1	None
5.0 M.2	ITS 5.4.1 states, "Written procedures shall be established, implemented, and maintained covering the following activities:...b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33." The CTS does not include this requirement. This changes the CTS by adopting a new requirement for emergency operating procedures.	5.4.1	None
5.0 M.3	ITS 5.4.1 states, "Written procedures shall be established, implemented, and maintained covering the following activities:...e. All programs specified in Specification 5.5." The CTS does not include this requirement. This changes the CTS by adopting a new requirement for procedures to address programs described in ITS 5.5.	5.4.1	None
5.0 M.4	CTS 6.12.1 states, "...entrance [into a high radiation area] thereto shall be controlled by requiring issuance of a Radiation Work Permit." ITS 5.7.1.b and 5.7.2.b state, "Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures." This changes the CTS by specifying certain information is required to be in the RWP or equivalent. The addition of the option to use a means equivalent to the RWP is addressed in DOC L.16.	5.7.1.b and 5.7.2.b	6.12.1
5.0 M.5	The CTS does not contain a diesel fuel oil testing program that controls the requirements for testing and maintaining the properties of both new and stored fuel oil. ITS 5.5.12 establishes a diesel fuel oil testing program to implement required testing of both new and stored fuel oil. This changes the CTS requirements by adding the requirement for a diesel fuel oil testing program.	5.5.12	None
5.0 M.6	The CTS does not contain specific requirements for a Technical Specification Bases Control Program that controls changes to the Bases. ITS 5.5.13 specifies the programmatic controls for processing changes to the Bases of the ITS. This changes the CTS by adding the requirements for the Technical Specification Bases Control Program.	5.5.13	None
5.0 M.7	Regarding lines of authority, CTS 6.2.1.a states, "These requirements shall be documented in the UFSAR." ITS 5.2.1.a states, "These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR/QA Plan." This changes the CTS by specifying that the plant-specific titles are specified in the QA Plan, as well as the UFSAR.	5.2.1.a	6.2.1.a

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.8	The second paragraph of ITS 5.6.2 includes detail to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.1.8 does not contain this level of detail. This changes the CTS by requiring additional detail be included in the Annual Radiological Environmental Operating Report.	5.6.2	6.9.1.8
5.0 M.9	ITS 5.6.6 requires a report be submitted within 14 days after entering Condition B of ITS 3.3.3, PAM Instrumentation. ITS 5.6.6 also states, "The report shall outline the cause of the inoperability and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status." The CTS do not include these requirements. This changes the CTS by requiring a report to be submitted within 14 days after entering Condition B of ITS 3.3.3 and specifying the contents of the report.	5.6.6	None
5.0 M.10	CTS 6.9.1.9, "Annual Radiological Effluent Release Report," states, "A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station…" The ITS 5.6.3 Note replaces the word "should" with "shall." This changes the CTS by clarifying that when a single submittal is made for a multiple unit station, sections common to all units are to be combined.	5.6.3	6.9.1.9
5.0 M.11	CTS 3.11.2.5, Explosive Gas Mixture, limits the concentration of oxygen allowed in the waste gas decay tanks. CTS 3.11.2.6, Gas Storage Tanks, limits the quantity of radioactivity contained in each gas storage tank. CTS 3.11.1.4 limits the quantity of radioactive material contained in each of the specified unprotected outdoor tanks. ITS 5.5.11, Explosive Gas and Storage Tank Radioactivity Monitoring Program, include limits on hydrogen in addition to oxygen in the waste gas decay tanks, and requires the program address requirements specified in ITS 5.5.11. This changes the CTS by requiring a new program and specifying certain requirements the program must meet. Changes moving Actions and Surveillance Requirements to the TRM are addressed by DOC LA.7.	5.5.11	3.11.2.5, 3.11.2.6 and 3.11.1.4
5.0 M.12	CTS 6.2.4.1 states, "The Shift Technical Advisor shall serve in an advisory capacity to Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit." ITS 5.2.2.f states, "An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift." This changes the CTS by adding more detail to technical areas for which the STA is to provide support, and states that the STA will meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.	5.2.2.f	6.2.4.1

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.13	Unit 2 CTS 6.12.1, High Radiation Area, "*," states, "Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas." Unit 2 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. Unit 2 CTS 6.12.2 states that the requirements of 6.12.1 also apply to each high radiation area 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 5.7.2, whose applicability is the same as Unit 2 CTS 6.12.2, does not include this allowance. This changes the CTS by deleting the exemption from the RWP issuance requirement for entering the high radiation areas addressed by Unit 2 CTS 6.12.2.	5.7.2	6.12.1 and 6.12.2
5.0 M.14	CTS 6.9.1.5.a requires, "A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions." CTS 6.9.1.5.a also states, "In the aggregate, at least 80 percent of the total whole body dose received from external sources should be assigned to specific major work functions." ITS 5.6.1 states, "A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated deep dose equivalent (reported in person-rem) according to work and job functions." ITS 5.6.1 also states, "In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions." This changes the CTS by changing dose and exposure terminology to the more precise deep dose equivalent terms. It also changes the CTS by clarifying that the personnel for whom reporting is done are those for whom monitoring was performed.	5.6.1	6.9.1.5.a

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.15	CTS 6.2.1.d states, "The management position responsible for training of the operating staff and the management position responsible for the quality assurance functions shall have sufficient organizational freedom including sufficient independence from cost and schedule when opposed to safety considerations." CTS 6.2.1.e states, "The management position responsible for health physics shall have direct access to that onsite individual having responsibility for overall facility management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures." ITS 5.2.1.d states, "The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures." This changes the CTS by stating that specified individuals, not just a particular manager, have sufficient organizational freedom and sufficient independence from operating pressures to perform their work. Also, rather than having access to particular managers, or the authority to cease work for reasons specified in the Specifications, the individuals have sufficient freedom to perform their work.	5.2.1.d	6.2.1.d and 6.2.1.e
5.0 M.16	CTS 6.12.1.b states that one of the optional criteria that allows entry into a high radiation area is, "A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them." ITS 5.7.1.e and ITS 5.7.2.e state, "Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry." This changes the CTS by expanding the requirement to apply to all the options for conditions allowing entry into a high radiation area, and adding the criteria that, "These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry." The phrase, "Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals," is addressed by DOC L.17.	5.7.1.e and 5.7.2.e	6.12.1.b
5.0 M.17	One option allowed by CTS 6.12.2 for personnel to enter a high radiation area with radiation intensity greater than 1000 mrem, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates, is to have, "A radiation monitoring device which continuously indicates the radiation dose rate in the area." ITS 5.7.2 does not include this allowance. This changes the CTS by deleting one of the acceptable means for providing personnel radiation exposure information.	5.7.2	6.12.2

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.18	CTS Table 6.2-1 states, "Procedures will be established to insure that NRC policy statement guidelines regarding work hours established for employees are followed." ITS 5.2.2.d states, "Administrative procedures shall be developed and implemented to limit working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Any deviation from the above guidelines shall be authorized by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines is not authorized." This changes the CTS by adding specific requirements for limiting work hours of personnel who perform safety related functions. The change not referencing the NRC policy statement guidelines regarding work hours is discussed in DOC L.24.	5.2.2.d	Table 6.2-1
5.0 M.19	As part of one option for equipment required to enter a high radiation area as specified in ITS 5.7.1.d.4 and 5.7.2.d.3, the specifications require, "A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and," one of two other criteria be met for entering a high radiation area. CTS 6.12.1.c does not include this requirement. This changes the CTS by adding an additional requirement for entering a high radiation area.	5.7.1.d.4 and 5.7.2.d.3	6.12.1.c
5.0 M.20	ITS 5.5.15.b states, "The containment design pressure is 45 psig." The CTS does not include such a statement. This changes the CTS by adding a design criterion to the Technical Specifications.	5.5.15.b	None
5.0 M.21	CTS 4.7.8.1 provides ventilation filter testing requirements for the safeguards area ventilation systems (SAVS). Each system is described as having one SAVS exhaust fan and one auxiliary building HEPA filter and charcoal adsorber assembly. ITS 5.5.10 provides ventilation filter testing requirements for the ECCS Pump Room Exhaust Air Cleanup System (PREACS) trains. Each ECCS PREACS train is described as having one safeguards area exhaust fan, one Auxiliary Building Central exhaust system fan, and respective filters, controls, and dampers. This changes CTS by adding additional equipment tested as part of the ventilation filter testing requirements, and changing the testing criteria accordingly, to conform to the system as described in NUREG-1431.	5.5.10	4.7.8.1

DOC No.	Description of Changes	ITS Requirement	CTS Requirement
5.0 M.22	CTS 6.8.4.c, "Secondary Water Chemistry," requires, "A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation." ITS 5.5.9, "Secondary Water Chemistry Program," states, "This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking." This changes CTS by adding the fact that the Secondary Water Chemistry Program provides controls for monitoring secondary water chemistry to inhibit low pressure turbine disc stress corrosion cracking in addition to SG tube degradation.	5.5.10	6.8.4.c
5.0 M.23	Unit 1 CTS 6.12, High Radiation Area, footnote "*," states, "Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas." Unit 2 CTS 6.12, High Radiation Area, footnote "*," states, "Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas." ITS 5.7.1.c states, "Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas." ITS 5.7.2.c states, "Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas." This changes the CTS by requiring that for personnel to be exempt from the RWP issuance requirement, they must be qualified in radiation protection procedures, or escorted by a qualified individual in high radiation areas. Changing the term "Health Physics" to "radiation protection" is addressed by DOC L.11.	5.7.1.c and 5.7.2.c	6.12 footnote "*"
5.0 M.24	CTS Table 6.2-1 requires that with both units in MODE 5 or 6 or defueled, two Auxiliary Operators (AOs) be part of the staff manning, one AO assigned to each unit. ITS 5.2.2.a states, "Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units." This changes the CTS by requiring three AOs with both units shutdown or defueled. Other changes to the AO requirements are addressed by DOC L.9.	5.2.2.a	Table 6.2-1
5.0 M.25	ITS 5.6.5.b contains two analytical methods, WCAP-8745-P-A and WCAP-14483-A, which do not appear in the CTS. This changes the CTS by adding two analytical methods to those referenced in the Technical Specifications.	5.6.5.b	None
5.0 M.26	ITS 5.5.10.e requires testing of MCR/ESGR EVS heaters to verify they dissipate the required wattage. The CTS does not contain this requirement. This changes the CTS by adding a Surveillance Requirement.	5.5.10.e	None