

ATTACHMENT 4

Table L - Less Restrictive Changes

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L.1	The CTS Section 1.0 definition of CHANNEL FUNCTIONAL TEST requires the use of a simulated signal when performing the test. ITS Section 1.0 splits the definition of CHANNEL FUNCTIONAL TEST into two definitions, the CHANNEL OPERATIONAL TEST (COT), and the TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT). The ITS COT and TADOT definitions allow the use of an actual or simulated signal when performing the tests. This changes the CTS by allowing the use of unplanned actuations to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.	1.1 definitions of COT and TADOT	1.0 definition of CHANNEL FUNCTIONAL TEST	Note 1
1.0 L.2	The CTS Section 1.0 definition of CORE ALTERATION applies to the movement or manipulation of any components in the reactor vessel with the vessel head removed and fuel in the vessel. The ITS Section 1.1 definition of CORE ALTERATION will only apply to the movement of fuel, sources, or reactivity control components in the reactor vessel. This changes the CTS by eliminating from the definition of a CORE ALTERATION the movement of any components in the reactor vessel that are not fuel, sources, or reactivity control components. The elimination of "or manipulation" from the definition is discussed in DOC A.5.	1.1 definition of CORE ALTERATION	1.0 definition of CORE ALTERATION	Note 1
1.0 L.3	The CTS Section 1.0 definition of "OPERABLE - OPERABILITY" requires that all necessary normal and emergency electrical power sources be available for the system, subsystem, train, component, or device to be OPERABLE. The ITS Section 1.1 definition of "OPERABLE - OPERABILITY" will replace the phrase "normal and emergency electrical power sources " with "normal or emergency electrical power sources ". This changes the CTS by allowing a device to be considered OPERABLE with either normal or emergency power available.	1.1 definition of OPERABLE - OPERABILITY	1.0 definition of OPERABLE - OPERABILITY	Note 1

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L.4	The CTS Section 1.0 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME require measurement of the response time from the sensor through the actuated equipment. The ITS definitions of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME are modified to state, " In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC." This changes the CTS by eliminating the requirement to include all components in a response time test.	1.1 definition of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME	1.0 definition of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME	Note 1
1.0 L.5	DELETED			

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

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Table L – Less Restrictive Changes  
ITS Section 2.0 – Safety Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
2.0 L.1	CTS 6.7.1 states that when a Safety Limit is violated, the NRC Operations Center must be notified within one hour, the Vice President - Nuclear Operations and the MSRC shall be notified within 24 hours, and a Safety Limit Violation Report must be prepared and submitted to the NRC, the Vice President - Nuclear Operations, and the MSRC within 14 days. The ITS does not contain these reporting requirements. This changes the CTS by eliminating the explicit reporting requirements and relying on the reporting required by regulations.	None	6.7.1	8

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



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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L.1	CTS 3.0.4 does not allow entry into a MODE or other specified condition in the Applicability when an LCO is not met and while relying on ACTIONS without a specific exception. ITS LCO 3.0.4 contains the same restriction, but eliminates specific exceptions and includes an allowance to enter a MODE or condition specified in the Applicability ""a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRC." CTS 4.0.4 states that entry into a MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise stated. ITS SR 3.0.4 states that entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency. When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: "a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specific condition in the Applicability for an unlimited period of time, b) After performance of a risk evaluation, consideration of the results, determination of the acceptability of the MODE change, and establishment of risk management actions, if appropriate, or c) When a specific value or parameter allowance has been approved by the NRC." This changes the CTS by allowing additional circumstances under which a MODE or other specified condition in the Applicability may be entered when the LCO is not met. ITS LCO 3.0.4.c is addressed in DOC A.7.	LCO 3.0.4	3.0.4	Note 1

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L.2	ITS LCO 3.0.5 is added to the CTS. ITS LCO 3.0.5 states, "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."	LCO 3.0.5	None	Note 1
3.0 L.3	CTS 3.0.5 provides an exception to the definition of OPERABILITY for normal and emergency power and to CTS 3.0.2. ITS LCO 3.0.6 replaces CTS 3.0.5 and expands the concept to apply to all Technical Specifications which support other Technical Specifications equipment, not only normal and emergency power. This changes the CTS in several ways. First, CTS 3.0.5 provides an exception to the definition of OPERABILITY and to the requirement to follow the Required Actions when an LCO is not met when a system, subsystem, train, or component is inoperable due to either the normal or emergency power source being inoperable. ITS LCO 3.0.6 expands that concept to all Technical Specifications systems supported by other Technical Specifications systems. Second, CTS 3.0.5 allows a system, subsystem, train, or component to be considered OPERABLE if it is inoperable solely because either the normal or emergency power source is inoperable. ITS LCO 3.0.6 does not allow the Technical Specifications system supported by the inoperable system (i.e., the "supported system") to be considered OPERABLE, but the Conditions and Required Actions of the supported system do not have to be followed - only the inoperable system's (i.e., the "support system") Conditions and Required Actions must be followed. Third, CTS 3.0.5 contains conditions which ensure that, absent a subsequent failure, the system,	LCO 3.0.6	3.0.5	Note 1

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  - 2 - Relaxation of Applicability
  - 3 - Relaxation of Completion Time
  - 4 - Relaxation of Required Action
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  - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
  - 7 - Relaxation Of Surveillance Frequency
  - 8 - Deletion of Reporting Requirements

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ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	subsystem, train, or component can perform its safety function. ITS LCO 3.0.6 also requires an evaluation in accordance with ITS 5.5.14, Safety Function Determination Program, to determine if a loss of safety function exists. This determination is consistent with the evaluations performed under CTS 3.0.5. If a loss of safety function exists, CTS 3.0.5 directs a unit shutdown. ITS LCO 3.0.6 directs that the supported system be declared inoperable and the Conditions and Required Actions followed. Fourth, CTS 3.0.5 is only applicable in MODES 1 - 4, as the normal and emergency power requirements are different than in MODES 5 and 6. ITS LCO 3.0.6 is expanded to include all MODES. Fifth, ITS LCO 3.0.6 states that if a Required Action directs that a system be declared inoperable or directs entry into other Conditions or Required Actions, the LCO exception may not be used. In those cases, the Required Actions directing entry are necessary to ensure that the appropriate actions are taken to address the inoperability.			
3.0 L.4	CTS 3.0.4 and CTS 4.0.4 are applicable in all MODES and prevent entry into a MODE or other specified condition in the Applicability unless the LCO or SR, respectively, is satisfied. ITS LCO 3.0.4 and ITS SR 3.0.4 are only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4. In addition, ITS LCO 3.0.4 and ITS SR 3.0.4 do not prohibit entry into a MODE or other specified condition if such entry is part of a shutdown of the unit.	LCO 3.0.4 and SR 3.0.4	3.0.4 and 4.0.4	Note 1
3.0 L.5	CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified	SR 3.0.2	4.0.2	Note 1

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ITS Section 3.0 – LCO and SR Applicability

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . . ' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . . ' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC M.2.			
3.0 L.6	CTS 4.0.3 states, in part, "The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours." ITS SR 3.0.3 states in part, "If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed." This changes the CTS by, 1) allowing a minimum of 24 hours and up to the specified Frequency to perform the missed Surveillance, provided a risk evaluation is performed for any Surveillance delayed greater than 24 hours, and 2) basing the time allowed to perform a missed	SR 3.0.3	4.0.3	Note 1

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DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	Surveillance before taking the Required Actions on the Surveillance Frequency instead of the allowed outage time.			

- Change Category:
- 1 - Relaxation of LCO Requirements
  - 2 - Relaxation of Applicability
  - 3 - Relaxation of Completion Time
  - 4 - Relaxation of Required Action
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Table L – Less Restrictive Changes  
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.1 L.1	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state that when the SDM is less than the limit, boration must be initiated immediately. ITS 3.1.1 Action A states that when SDM is less than the limit, boration must be initiated within 15 minutes. This changes the CTS by relaxing the Completion Time from “immediately” to 15 minutes.	3.1.1, ACTION A	3.1.1.1 and 3.1.1.2	3
3.1.1 L.2	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state that when the SDM is not within its limit, boration must be initiated and continued at $\geq 10$ gpm of 12,950 ppm boric acid solution or equivalent until the required SDM is restored. ITS 3.1.1 Action A states that with the SDM not within limit, initiate boration to restore SDM to within limit. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance from the Required Action.	3.1.1, ACTION A	3.1.1.1 and 3.1.1.2	4
3.1.1 L.3	CTS Surveillance 4.1.1.1.1.d requires verification that SDM is within its limit, “Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e below, with the control banks at the maximum insertion limit of Specification 3.1.3.6.” The ITS does not contain a similar requirement.	None	4.1.1.1.1.d	5
3.1.2 L.1	CTS 3.1.1.1 is applicable in MODES 1, 2, 3, and 4. ITS 3.1.2 is applicable in MODES 1 and 2. This changes the CTS by reducing the applicable MODES in which the core reactivity requirement must be met.	3.1.2 Applicability	3.1.1.1 Applicability	2

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7 - Relaxation Of Surveillance Frequency  
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Table L – Less Restrictive Changes  
ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.2 L.2	CTS 3.1.1.1 does not contain Actions to follow if the core reactivity balance Surveillance is not met. If the core reactivity balance Surveillance was not met, LCO 3.0.3 would be entered. LCO 3.0.3 requires the plant to be in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. ITS 3.1.2 contains Actions to follow if the core reactivity balance LCO is not met. If the LCO is not met, 7 days is provided to re-evaluate the core design and safety analysis, and determine that the reactor core is acceptable for continued operation and to establish appropriate operating restrictions and SRs. If these actions are not completed within the AOT, the plant must be in MODE 3 within 6 hours. This changes the CTS by providing 7 days to evaluate and provide compensatory measures for not meeting the core reactivity balance requirement and then requiring entry into MODE 3 instead of requiring an immediate shutdown and entry into MODE 5.	3.1.2 ACTIONS	None	4
3.1.2 L.3	CTS Surveillance 4.1.1.1.2 requires the overall core reactivity balance to be compared with the predicted value once per 31 EFPD. The CTS also requires the predicted reactivity values to be adjusted (normalized) to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. ITS SR 3.1.2.1 also requires the measured core reactivity to be compared to the predicted values every 31 EFPD, but the ITS SR is only required after 60 EFPD of core burnup. The ITS also allows the adjustment of the predicted values to the actual values prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. This changes the CTS by not requiring the at-power core reactivity comparison until core burnup reaches 60 EFPD.	SR 3.1.2.1	4.1.1.1.2	7

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

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

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

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

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

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ITS Section 3.1 – Reactivity Control Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L.8	CTS 4.1.3.1.1 requires the position of each rod to be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours. ITS SR 3.1.4.1 requires verification that the individual rod positions are within the alignment limit every 12 hours. This changes the CTS by eliminating the requirement to verify the individual rod positions to be within the alignment limit every 4 hours when the Rod Position Deviation Monitor is inoperable.	SR 3.1.4.1	4.1.3.1.1	7
3.1.4 L.9	CTS 3.1.3.4 states that the rod drop time must be measured from the 229 step withdrawn position. ITS 3.1.4.3 states the rod drop time must be verified from the fully withdrawn position. This changes the CTS by eliminating the rod step position equivalent to the fully withdrawn position.	3.1.4.3	3.1.3.4	6
3.1.5 L.1	CTS LCO 3.1.3.5 states, "All shutdown rods shall be limited in physical insertion as specified in the CORE OPERATING LIMITS REPORT." CTS 3.1.3.5, Action a, applies when one shutdown rod is inserted beyond the insertion limits and requires, within one hour, restoration of the rod to within the insertion limits or declaration of the rod to be misaligned and application of Specification 3.1.3.1. ITS LCO 3.1.5 states, "Each shutdown bank shall be within insertion limits specified in the COLR." ITS 3.1.5 does not contain actions for a single rod inserted below the insertion limit and single rod misalignment greater than 12 steps would fall under the requirement of ITS LCO 3.1.4. LCO 3.1.4 requires the rods to be aligned within 12 steps. This changes the CTS by eliminating the CTS 3.1.3.5 requirement to declare a single shutdown rod below the insertion limits misaligned, even if the rod is within 12 steps of the group alignment limits.	LCO 3.1.5	LCO 3.1.3.5, 3.1.3.5 Action a	1

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.5 L.2	CTS Surveillance 4.1.3.5 requires verification that each shutdown rod is within the insertion limit specified in the CORE OPERATING LIMITS REPORT within 15 minutes prior to initial control rod bank withdrawal during an approach to reactor criticality. ITS 3.1.5 does not require verification that the shutdown rods are above the insertion limits within 15 minutes prior to initial control bank withdrawal. This changes the CTS by eliminating the requirement that the shutdown banks be verified to be above the insertion limit within 15 minutes prior to withdrawing the first control bank.	None	4.1.3.5	5
3.1.5 L.3	CTS 3.1.3.5 does not contain an Action for a shutdown bank not within the insertion limit except Action b, which contains a number of qualifying conditions. Under the CTS, a shutdown bank not within the insertion limits and not meeting the qualifying conditions in CTS Action b, would result in an CTS 3.0.3 entry. CTS 3.0.3 allows one hour to prepare for a shutdown and requires the plant to be in MODE 3 within 7 hours. ITS 3.1.5, Condition A, applies with one or more shutdown banks not within limits for reasons other than Condition B (which is the same as CTS Action b). It allows 2 hours to restore the bank to within the insertion limits and then requires the plant to be in MODE 3 in 6 hours. This changes the CTS by allowing an additional hour (from 7 hours to 8 hours) to be in MODE 3 under this condition.	3.1.5, Condition A	3.1.3.5	3
3.1.6 L.1	CTS 4.1.3.6 requires the position of each control bank to be determined to be within the insertion limits at least once per 12 hours except during time intervals when the Rod Insertion Limit Monitor is inoperable, then verify the individual rod positions (indicated positions) or the group step counter demand position of each rod group to be within the insertion limits at least once per 4 hours. ITS SR 3.1.6.2 requires verification that each control bank insertion is within the limits in the COLR every 12 hours. This changes the CTS by eliminating the requirement to verify the control bank insertion to be within limits every 4 hours when the Rod Insertion Limit Monitor is inoperable.	SR 3.1.6.2	4.1.3.6	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L.1	CTS 3.1.3.2 states, "The shutdown and control rod position indicating system shall be OPERABLE with . . . each demand position indicator, 1 per group, accurate to within +/- 2 steps of demand position" CTS SR 4.1.3.2.2 requires each demand position indicator to be demonstrated OPERABLE by performing CHANNEL CHECKS every 7 days and every 92 days. ITS LCO 3.1.7 states, "The Rod Position Indication (RPI) System and the Demand Position Indication System shall be OPERABLE." This changes the CTS by eliminating the specific tolerance requirement and CHANNEL CHECK Surveillances on the demand position indicators.	LCO 3.1.7	3.1.3.2 and 4.1.3.2.2	1
3.1.7 L.2	CTS 3.1.3.2 states, "The shutdown and control rod position indicating system shall be OPERABLE with . . . the Automatic Rod Position Deviation Monitor with the alarm setpoint < 12 steps." ITS LCO 3.1.7 states, "The Rod Position Indication (RPI) System and the Demand Position Indication System shall be OPERABLE." This changes the CTS by eliminating the requirements on the Automatic Rod Position Deviation Monitor.	LCO 3.1.7	3.1.3.2	1
3.1.7 L.3	CTS 3.1.3.2 Action a.1 states that with a maximum of one individual rod position indicator channel per group inoperable, determine the position of the non-indicating rod indirectly by the moveable incore detectors at least once per 8 hours and immediately after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position. ITS 3.1.7, Action C.1 states, "One or more rods with inoperable position indicators have been moved in excess of 24 steps in one direction since the last determination of the rod's position, verify the position of the rods with inoperable position indicators by using the moveable incore detectors within 4 hours. This changes the CTS by allowing 4 hours to verify the rod position instead of requiring the verification immediately.	3.1.7, Action C.1	3.1.3.2 Action a.1	3

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L.4	CTS 4.1.3.2 requires each rod position indicator to be determined OPERABLE by performing a CHANNEL CHECK every 12 hours and a CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION at least once per 18 months. ITS SR 3.1.7.1 requires a CHANNEL CALIBRATION every 18 months. This changes the CTS by eliminating the CHANNEL CHECK and CHANNEL FUNCTIONAL TEST requirements.	SR 3.1.7.1	4.1.3.2	5
3.1.7 L.5	CTS 3.1.3.2 does not have an action for more than one Rod Position Indicator Channel is inoperable per group. CTS 3.0.3 would be entered in this condition. CTS 3.0.3 requires a shutdown to MODE 3 within 7 hours. ITS 3.1.7, Condition B, applies when more than one RPI per group is inoperable and requires the rods to be placed under manual control immediately, monitoring and recording of RCS T <sub>avg</sub> once per hour, verification of rod position using the movable incore detectors once per 8 hours, and restoration of all but one RPI to OPERABLE status within 24 hours. This changes the CTS by allowing operation for an additional 24 hours with more than one RPI per group inoperable.	3.1.7, Condition B	3.1.3.2	4
3.1.8 L.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. ITS 3.1.8 Actions state that when the primary grade water flow path are not isolated, positive reactivity additions must be suspended immediately, the primary grade water flow path must be isolated within 15 minutes and SR 3.1.1.1 must be performed within 1 hours. This changes the CTS by eliminating the Unit 1 Action that a unit in MODES 3 or 4 be shutdown to MODE 5 within 30 hours. The other changes to CTS 3.1.1.3.2 are discussed in DOCs A.3, M.1, and LA.1.	3.1.8 Actions	Unit 1 3.1.1.3.2	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.8 L.2	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% $\Delta k/k$ within 60 minutes. ITS 3.1.8 Actions state that when one or more valves are not secured in the closed position, positive reactivity changes 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 3.1.1.1 within 4 hours. This changes the Unit 2 CTS by allowing 4 hours to determine the SHUTDOWN MARGIN per SR 3.1.1.1.	3.1.8 Actions	Unit 2 3.1.1.3.2	3
3.1.9 L.1	CTS 4.10.3.2 requires that tests be performed on each Intermediate and Power Range channel within 12 hours prior to initiating PHYSICS TESTS. ITS SR 3.1.9.1 requires that the testing be performed prior to initiation of PHYSICS TESTS. This changes the CTS by eliminating the time period prior to initiation of PHYSICS TESTS within which the testing must be performed.	SR 3.1.9.1	4.10.3.2	7
3.1.9 L.2	ITS 3.9.1 states that the number of required channels for LCO 3.3.1, "RTS Instrumentation," Functions 2, 3, 6, and 18.d, may be reduced to "3" required channels, during the performance of PHYSICS TESTS. CTS 3.10.3 does not contain this allowance. This changes the CTS by reducing LCO requirements for the number of Power Range Neutron Flux channels from "4" to "3" during PHYSICS TESTS initiated in MODE 2.	LCO 3.9.1	None	1

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

Table L – Less Restrictive Changes  
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.1 L.1	CTS 3.2.2, Action a, states the Power Range Neutron Flux - High Trip setpoints must be reduced 1% for each 1% $F_Q^M(Z)$ exceeds its limit within 4 hours. ITS 3.2.1, Action A.2.2, requires the Power Range Neutron Flux - High trip setpoints be reduced $\geq 1\%$ for each 1% $F_Q^M(Z)$ exceeds its limit within 72 hours. This changes the CTS by extending the Completion Time from 4 hours to 72 hours.	3.2.1, Action A.2.2	3.2.2, Action a	3
3.2.1 L.2	CTS 3.2.2, Action b, states that when $F_Q^M(Z)$ exceeds its limit, identify and correct the cause of the out of limit condition prior to increasing THERMAL POWER above the reduced power limit. ITS 3.2.1, Action A.2.4, requires verification that $F_Q^M(Z)$ is within its limit prior to increasing THERMAL POWER above the reduced power limit. This changes the CTS by eliminating the requirement to identify the cause of the out of limit condition prior to increasing power above the reduced power limit.	3.2.1, Action A.2.4	3.2.2, Action b	4
3.2.2 L.1	CTS 3.2.3, Action a states that when $F_{\Delta H}^N$ exceeds its limit, reduce THERMAL POWER to less than 50% RTP within 2 hours and reduce the Power Range Neutron Flux - High trip setpoints to less than 55% of RTP within the next 4 hours. ITS 3.2.2, Actions A.1 and A.2 state that with $F_{\Delta H}^N$ not within this limit, reduce THERMAL POWER to $\leq 50\%$ RTP within 4 hours and reduce the Power Range Neutron Flux - High trip setpoints to $\leq 55\%$ RTP within 72 hours. This changes the CTS by allowing a 4 hour Completion Time to reduce power to $\leq 50\%$ RTP and 72 hours to reduce the trip setpoint.	3.2.2, Actions A.1 and A.2	3.2.3, Action a	3
3.2.2 L.2	CTS 3.2.3, Action b states that when $F_{\Delta H}^N$ exceeds its limit, demonstrate through incore mapping that $F_{\Delta H}^N$ is within its limit or reduce THERMAL POWER to less than 5% within the next 2 hours. ITS 3.2.2, Action B states that with the Required Action and associated Completion Time not met, be in MODE 2 within 6 hours. This changes the CTS by allowing a 6 hour Completion Time to reduce power to $< 5\%$ RTP.	3.2.2, Action B	3.2.3, Action b	3

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



Table L – Less Restrictive Changes  
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.3 L.1	CTS 3.2.1, Action a, states that when AFD is not within its limit, reduce THERMAL POWER to less than 50% within 30 minutes and reduce the Power Range Neutron Flux - High Trip setpoints to ≤ 55% of RTP within the next 4 hours. ITS 3.2.3, Action A.1, requires THERMAL POWER to be reduced to less than 50% within 30 minutes when AFD is outside of its limit. This changes the CTS by eliminating the requirement to reduce the High Flux Trip Setpoint to ≤ 55% within 4 hours.	3.2.3, Action A.1	3.2.1, Action a	4
3.2.3 L.2	CTS 4.2.1.1 requires the indicated AFD for each excore channel to be determined to be within its limits once per 7 days when the AFD Monitor is OPERABLE, and at least once per hour for the first 24 hours after restoring the AFD Monitor Alarm to OPERABLE status, and once per hour for the first 24 hours and once per 30 minutes thereafter when the AFD Monitor Alarm is inoperable. ITS SR 3.2.3.1 requires AFD to be verified within its limits for each OPERABLE excore channel every 7 days. This changes the CTS by eliminating all AFD Surveillance Frequencies based on the OPERABILITY of the AFD Monitor.	SR 3.2.3.1	4.2.1.1	7
3.2.4 L.1	CTS 3.2.4 states that the QPTR shall not exceed 1.02. CTS Action a provides actions for QPTR > 1.02 and ≤ 1.09 and CTS 3.2.4 actions b and c provide actions for QPTR > 1.09. CTS action b applies when QPTR > 1.09 due to misalignment of a RCCA and requires a power reduction of 3% RTP for every 1% QPTR exceeds 1.0 within 30 minutes and reduce power to < 50% RTP within 2 hours if QPTR is not restored to within limits. CTS action c applies when QPTR > 1.09 for any other reason and requires reducing power to < 50% RTP within 2 hours. ITS LCO 3.2.4 states that QPTR shall be ≤ 1.02. ITS 3.2.4 contains actions for QPTR > 1.02, but does not contain additional actions for QPTR > 1.09. This changes the CTS by eliminating additional actions for QPTR > 1.09.	3.2.4	3.2.4	4

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

Table L – Less Restrictive Changes  
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L.2	CTS 4.2.4.1 requires the QPTR to be verified to be within limit every 7 days with the QPTR alarm is OPERABLE and every 12 hours with the QPTR alarm is inoperable. ITS SR 3.2.4.1 requires verification that the QPTR is within limit every 7 days. This changes the CTS by eliminating the requirement to verify QPTR more frequently when the QPTR alarm is inoperable.	SR 3.2.4.1	4.2.4.1	7
3.2.4 L.3	CTS 3.2.4, Action a.1.b) (Unit 1) and Action a.2.(b) (Unit 2), states that when QPTR is not within its limit, reduce THERMAL POWER by at least 3% RTP for every 1% of indicated QPTR in excess of 1.0 and reduce the Power Range Neutron Flux - High Trip setpoints within the next 4 hours. ITS 3.2.4, Action A.1, requires THERMAL POWER to be reduced > 3% RTP for each 1% QPTR > 1.00. This changes the CTS by eliminating the requirement to reduce the High Flux Trip Setpoint.	3.2.4, Action A.1	3.2.4, Action a.1.b) (Unit 1) and Action a.2.(b) (Unit 2)	4

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

Table L – Less Restrictive Changes  
ITS Section 3.2 – Power Distribution Limits

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L.4	CTS 3.2.4, Action a.2 (Unit 1) states that with QPTR $\geq 1.02$ and $\leq 1.09$ , verify that QPTR is within its limit within 24 hours or reduce THERMAL POWER to less than 50% RTP within the next 2 hours and reduce the Power Range Neutron Flux - High Trip setpoints to $\leq 55\%$ RTP within the next 4 hours. CTS 3.2.4, Action a.1(a) and a.3 (Unit 2) states that with QPTR $\geq 1.02$ and $\leq 1.09$ , calculate QPTR at least once per hour until THERMAL POWER is reduced to less than 50% of RTP and verify that QPTR is within its limit within 24 hours or reduce THERMAL POWER to less than 50% RTP within the next 2 hours and reduce the Power Range Neutron Flux - High Trip setpoints to $\leq 55\%$ RTP within the next 4 hours. CTS 3.2.4, Action a.3 (Unit 1) and a.4 (Unit 2) state that the cause of the out of limit QPTR must be identified and corrected prior to increasing THERMAL POWER and subsequent operation above 50% RTP can proceed provided that the QPTR is verified to be within its limit at least once per hours for 12 hours or until verified acceptable at 95% or greater RTP. ITS 3.2.4, Action B, states that with the Required Actions and Associated Completion Times of Condition A not met, reduce THERMAL POWER to $\leq 50\%$ RTP within 4 hours. This changes the CTS by eliminating requirements to be $\leq 50\%$ RTP within a specified time of exceeding the LCO and substituting compensatory measures in Condition A, which if not met, result in a reduction in power.	3.2.4, Action B	3.2.4, Action a.2, a.3 (Unit 1), and Action a.1(a), a.3, and a.4 (Unit 2)	4
3.2.4 L.5	CTS Surveillance 4.2.4.1 states that QPTR shall be determined to be within the limit by calculating the ratio at least once per 7 days. ITS SR 3.2.4.1, Note 2, states that SR 3.2.4.2, which requires verification of QPTR using the movable incore detectors, may be performed in lieu of SR 3.2.4.1. This changes the CTS by allowing the movable incore detectors to be used to determine QPTR instead of the excore detectors.	SR 3.2.4.1, Note 2	4.2.4.1	6

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.		Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1	L.1	CTS Table 3.3-1 requires for various functions that Action 15 be entered for an inoperable channel in MODES 3*, 4*, and 5*. Note * states, "With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal." Action 15 states that an inoperable channel shall be returned to OPERABLE status within 48 hours or open the Reactor Trip Breakers (RTBs) within the next hour. ITS Table 3.3.1-1 for these functions requires ITS Action C to be entered. Action C states with one channel or train inoperable, restore the function to OPERABLE status in 48 hours or initiate action to fully insert all rods. The Rod Control System must be placed in a condition incapable of rod withdrawal within the next hour. The applicable MODES or other specified conditions for MODES 3, 4, and 5 are modified by Note <sup>(a)</sup> . Note <sup>(a)</sup> states, "With Rod Control System capable of rod withdrawal or one or more rods not fully inserted." This changes the CTS by not requiring the RTBs to be opened but allowing an alternative action to disable the Rod Control System.	Table 3.3.1-1 Note (a)	Table 3.3-1 Action 15 Note *	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.2	CTS 3.3.1.1 requires for an inoperable Power Range channel that Action 2 be entered. This Action requires the inoperable channel to be placed in trip within 72 hours, and both the THERMAL POWER $\leq 75\%$ and the Power Range Neutron Flux trip setpoint $\leq 85\%$ within the next 4 hours. The Action also provides an alternate option to reducing power and decreasing the trip setpoints. The option requires the channel to be placed in trip within 72 hours and the performance of a QPTR measurement every 12 hours. ITS 3.3.1 Condition D.1 requires for one Power Range Neutron Flux - High channel inoperable, the channel will be placed in trip within 72 hours and the THERMAL POWER will be reduced to $\leq 75\%$ within the next 6 hours. An alternative to this requirement is to place the channel in trip and perform a QPTR every 12 hours. This changes the CTS requirements by eliminating the requirement to reduce the Power Range Neutron Flux trip setpoint to $\leq 85\%$ within 78 hours.	3.3.1 Required Action D.1	3.3.1.1 Action 2	4
3.3.1 L.3	CTS 3.3.1.1 Action 2 provides an option to reduce power and decrease the trip setpoints when a Power Range channel is inoperable. The option requires the channel to be placed in trip within 72 hours or a QPTR measurement is performed every twelve hours. ITS 3.3.1 Required Action D.2 maintains the requirement for placing the channel in trip and performing the QPTR measurement. A Note is added to Required Action D.2.2 that allows the Power Range channel to be considered OPERABLE, for the purpose of calculating the QPTR, if the portion of the channel continues to provide the necessary input for the QPTR calculation. This modifies the CTS by allowing the Power Range to be considered OPERABLE, for the purposes of QPTR calculation, if the channel continues to provide a valid signal to determine the power distribution. This changes the CTS by allowing an action that is not contained in the CTS.	3.3.1 Required Action D.2.2 Note	None	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.4	CTS 3.3.1.1 Functional Unit 5, Neutron Flux Intermediate Range channels, in Table 3.3-1 states the Applicability for the instruments as Modes 1 <sup>###</sup> and 2. The <sup>###</sup> requires the channels to be OPERABLE, “Below the P-10 (Power Range Neutron Flux) setpoint.” If a channel becomes inoperable, Action 3 must be entered. CTS Action 3.b states with an inoperable Intermediate Range channel above P-6 but below P-10 restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-10 setpoint. CTS Action 3.c allows continued operation with an inoperable Intermediate Range channel if THERMAL POWER is greater than P-10. ITS 3.3.1 Function 4 Intermediate Range Neutron Flux in Table 3.3.1-1 lists the Applicable Modes or other specified conditions as MODE 1 <sup>(b)</sup> and 2 <sup>(c)</sup> . The superscript letters for the MODES denote the specified conditions. The Intermediate Range channels are required to be OPERABLE whenever reactor power is between MODE 2 <sup>(c)</sup> (Intermediate Range Neutron Flux interlock, P-6) and MODE 1 <sup>(b)</sup> (the Power Range Neutron Flux interlock, P-10). If an Intermediate Range channel becomes inoperable when reactor power is between P-6 and P-10, either ITS Required Actions F.1 or F.2 must be met. Required Action F.1 states that THERMAL POWER must be reduced to < P-6 within 24 hours. Required Action F.2 requires that THERMAL POWER be increased to > P-10 within 24 hours. This changes the CTS by allowing the reactor power to be increased to > P-10 (approximately 10% RTP) with an inoperable Intermediate Range channel with reactor power above the P-6 setpoint. This also changes the MODES of Applicability from MODE 1 <sup>###</sup> and 2 to specific values of the Power Range and Intermediate Range interlocks (P-10 and P-6).	Table 3.3.1-1	Table 3.3-1	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.5	CTS Table 3.3-1 Functional Unit 5 Neutron Flux Intermediate Range channels states if a channel becomes inoperable Action 3 must be entered. CTS Action 3.a states that when below P-6 restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 setpoint. CTS Action 3.b states with an inoperable Intermediate Range channel above P-6 but below P-10 restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above P-10. No allowance is provided for two inoperable channels, therefore LCO 3.0.3 must be entered in this condition. ITS Table 3.3.1-1 Function 4 Intermediate Range Neutron Flux states that Action G must be entered for two inoperable channels. ITS Action G states, "Two Intermediate Range channels inoperable," Required Actions G.1 and G.2 must be completed. Required Action G.1 states, "Suspend operations involving positive reactivity additions." Required Action G.2 states, "Reduce THERMAL POWER < P-6," within 2 hours. A Note modifies the Required Actions that states "Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM." This changes the CTS by allowing Required Actions with two Intermediate Range channels inoperable that are not currently allowed.	3.3.1 ACTION G	None	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.6	CTS Table 4.3-1 lists for the Power Range Low Setpoint and Intermediate Range channels, the surveillance requirements for a CHANNEL FUNCTIONAL TEST (CFT). The Frequency of the CFT for these functions is S/U <sup>(1)</sup> . S/U requires the surveillance must be performed prior to a reactor startup. Note <sup>(1)</sup> states, "If not performed in previous 31 days." The Source and Intermediate Ranges additionally require a quarterly test to be performed (Q <sup>(12)</sup> ). Note <sup>(12)</sup> states, "Quarterly Surveillance in MODE 3*, 4*, and 5* shall also include verification that Permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window." The movement of the phrase, "by observation of the permissive annunciator window," is addressed by DOC LA.6. The deletion of quarterly surveillance in MODES 3*, 4*, and 5* is addressed by DOC L.10. The movement of the verification of Permissives P-6 and P-10 is addressed by DOC A.29. ITS SR 3.3.1.8 for the Source, Intermediate, and Power Range Neutron Flux Low Setpoint channels require a CHANNEL OPERATIONAL TEST (COT) to be performed every 92 days. Additionally, a COT must be performed for these instrument channels prior to reactor startup if not performed within the previous 92 days. The COT must be performed for the Source Range within 4 hours after reducing power below the P-6 setpoint and the Power Range Low Setpoint and Intermediate Range channels must perform the COT within 12 hours after power is reduced below the P-10 setpoint. This changes the CTS by allowing 4 hours for the Source Range and 12 hours for the Power and Intermediate Ranges to perform the required test after entry into the applicable MODES or other specified conditions.	SR 3.3.1.8	Table 4.3-1	7

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



Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

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

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.9	CTS Table 4.3-1 lists the surveillance requirements for the Power Range Neutron Flux CHANNEL CALIBRATION as M <sup>(3)(6)</sup> . Note <sup>(3)</sup> states, “Compare incore to excore axial offset above 15 % RATED THERMAL POWER (RTP). Adjust channel if absolute difference ≥ 3 percent.” ITS Table 3.3.1–1 specifies SR 3.3.1.3 for the Overtemperature ΔT function. SR 3.3.1.3 states, “ Compare results of the incore detector measurements to NIS AFD. Adjust NIS channel if absolute difference >3%.” A Note modifies the SR which states, “Not required to be performed until 72 hours after THERMAL POWER is ≥ 15 % RTP.” The change from monthly to every 31 EFPD is addressed by DOC L.16. This changes the CTS by specifically stating that 72hours is allowed before requiring the completion of a comparison after THERMAL POWER equals or exceeds15 % RTP.	SR 3.3.1.3 NOTE 2	None	7

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

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

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.12	Not used.	N/A	N/A	N/A
3.3.1 L.13	CTS 3.3.1.1 in Table 3.3-1 lists the required number of channels for Reactor Trip Breakers (RTBs) to be OPERABLE. Action 1 must be entered if one train of either function becomes inoperable. Action 1 states, “with the number of channels OPERABLE one less than required by the minimum Channels OPERABLE requirement, be in HOT STANDBY within 6 hours;” ITS 3.3.1 in Table 3.3.1-1 states for the function a specific number of trains that are required to be OPERABLE. If a train of RTB becomes inoperable, Condition P must be entered. The Required Actions for Conditions P allows one hour to return an inoperable train to OPERABLE status, or six additional hours to reach MODE 3. This changes the CTS requirements by allowing one additional hour to return the inoperable train to OPERABLE status.	3.3.1 ACTION P	Table 3.3-1 Action 1	3
3.3.1 L.14	CTS 3.3.1.1 requirements listed in Table 3.3-1 for P-6, P-8, and P-13 specifies two limits for the Allowable Values. The P-6 function lists the setpoint as $1 \times 10^{-10}$ and allowable value as $< 3 \times 10^{-10}$ for increasing power. The P-8 interlock for decreasing power lists the setpoint and allowable value as 28% and >27%, respectfully. Decreasing power for the P-13 interlock, the setpoint and allowable value are stated as 8% and 7%. ITS 3.3.1 requirements in Table 3.3.1-1 for the Reactor Trip System interlocks P-6, P-8, and P-13 do not list the reset setpoints and allowable values in the specifications. This changes the CTS by not requiring these specific interlocks to state the reset values for Allowable Values.	None	Table 3.3-1	1

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

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

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.17	The CTS requires a CHANNEL FUNCTIONAL TEST for the Source Range Neutron Flux channels on a quarterly basis. Normally, if the reactor has been operating in MODE 1 for greater than 92 days, the surveillance should be performed prior to entering the MODE of Applicability on a reactor shutdown. The MODES of Applicability for these channels are listed as 2, 3, 4, and 5. To not perform the required surveillance prior to entry into the MODE of Applicability requires an exception to Surveillance Requirement 4.0.4. The CTS requirements do not contain the required exception. ITS SR 3.3.1.7 for the Source Range Neutron Flux channel requires a COT be performed every 92 days. This surveillance requirement is modified by a Note, which states, “Not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entry into MODE 3.” The applicable MODES for this requirement are listed as 2 <sup>(d)</sup> , 3 <sup>(a)</sup> , 4 <sup>(a)</sup> , and 5 <sup>(a)</sup> . Note <sup>(d)</sup> states, “Below the P-6 (Intermediate Range Neutron Flux) interlocks. Note <sup>(a)</sup> states, “With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.” This changes the CTS by allowing 4 hours, after entering MODE 3 from MODE 2, to perform the COT on the Source Range channels.	SR 3.3.1.7 Note	Table 3.3-1	6

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.18	CTS Table 3.3-1 requires for various functions that Action 15 be entered for an inoperable channel in MODES 3*, 4*, and 5*. Note * states, "With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal." Action 15 states that an inoperable channel be returned to OPERABLE status within 48 hours or open the Reactor Trip Breakers (RTBs) within the next hour. ITS Table 3.3.1-1 for Source Range function requires ITS Action J to be entered. Action J states with one channel inoperable, restore the function to OPERABLE status in 48 hours or initiate action to fully insert all rods in 48 hours and place the Rod Control System in a condition incapable of rod withdrawal within 49 hours. The applicable MODES or other specified conditions for MODES 3, 4, and 5 are modified by Note <sup>(a)</sup> . Note <sup>(a)</sup> states, "With Rod Control System capable of rod withdrawal or one or more rods not fully inserted." This changes the CTS by not requiring the RTBs to be opened but allowing an alternative action to disable the Rod Control System.	3.3.1 ACTION J	Table 3.3-1 Action 15	4
3.3.1 L.19	CTS Table 2.2-1, Notes 1 and 2, provide the RTS instrumentation trip setpoints formulas for the calculation of Overtemperature (OT) and Overpower (OP) $\Delta T$ functions. The values used for various constants specify exact number for each constant to be adjusted. ITS Table 3.3.1-1 Notes 1 and 2 provide the formulas for the calculation of Overtemperature and Overpower $\Delta T$ functions. The values for constants P', K <sub>1</sub> , K <sub>2</sub> , K <sub>3</sub> , K <sub>4</sub> , K <sub>5</sub> , K <sub>6</sub> , $\tau_1$ , $\tau_2$ , and $\tau_3$ are modified with less than or equal to ( $\leq$ ), or greater than or less to ( $\geq$ ) symbols to allow a tolerance. This changes the CTS by allowing the values of the constants to be set to a limit not currently allowed.	Table 3.3.1-1 Notes 1 and 2	Table 2.2-1, Notes 1 and 2	1

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.20	CTS 4.3.1.1.2 states, “The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months.” ITS Table 3.3.1-1 under the Surveillance Requirements column lists SR 3.3.1.16. This SR states, “Verify RTS RESPONSE TIME is within limits.” This SR is required for all RTS Functions except the following: (1) Manual Reactor Trip, (3.a) Power Range Neutron Flux High Positive Rate, (4) Intermediate Range Neutron Flux, (7) Overpower ΔT, (15) Steam/Feed Flow Mismatch and Low Steam Generator Water Level, (16) Turbine Trip, (17) SI input from ESF, (11) Reactor Coolant Pump Breaker Position Trip, (19) Reactor Trip Breakers, (20) RTB Undervoltage and Shunt Trip Mechanisms, and (21) Automatic Trip Logic. This changes the CTS by deleting the Response Time Testing requirements for the listed functions.	SR 3.3.1.16	4.3.1.1.2	5
3.3.1 L.21	DELETED			
3.3.1 L.22	Unit 1 CTS Table 4.3-1 Function 18, Turbine Trip on Low Auto Stop Oil Pressure or Turbine Stop Valve Closure states the related Surveillance is required as MODES 1 and 2. The Surveillance required is a CHANNEL FUNCTIONAL TEST with a listed 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 16, Turbine Trip on Low Auto Stop Oil Pressure or Turbine Stop Valve Closure is 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 changing the applicability of the Surveillance from MODES 1 and 2 to MODE 1 above the P-8 interlock.	Table 3.3.1-1 NOTE g	Table 4.3-1 Note (1)	2

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



Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.23	CTS Table 3.3-1 Function 2 Power Range Neutron Flux (PRNF) and Function 3 PRNF High Positive and Negative Rate trips state that Action 2 is to be entered for an inoperable channel. Action 2, Part a states that an inoperable channel must be placed in the tripped condition within 72 hours. Action 2, Part b allows the testing of additional channel with one channel inoperable. Action 2, Part c states that THERMAL POWER is to be limited to $\leq 75\%$ Rated Thermal Power (RTP) and the PRNF trip setpoints are to be reduced to $\leq 85\%$ RTP within 78 hours. Action 2, Part d provides instructions for determining the QUADRANT POWER TILT RATIO (QPTR) with an inoperable PRNF channel. ITS Function 3 PRNF rate trips, high positive or high negative states that Condition E be entered for an inoperable channel. Condition E.1 states "Place channel in trip," within 72 hours, or Condition E.2 requires that the unit be placed "in MODE 3," within 78 hours. Condition E.2 is addressed by DOC M.2. A Note modifies the Required Actions of Condition E. This Note allows the testing of an additional channel with one channel inoperable. This changes the CTS by not requiring the performance of a QPTR and not requiring power and flux trip setpoints to be reduced for an inoperable PRNF rate trip channel.	3.3.1 ACTION E	Table 3.3-1 Action 2, Part d	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.24	CTS Table 4.3–1 requires a CHANNEL FUNCTIONAL TEST for Function 6 Source Range Neutron Flux channels at a frequency of S/U <sup>(1)</sup> . S/U requires the surveillance to be performed prior to each reactor start up. Note <sup>(1)</sup> states, “If not performed within the previous 31 days.” This requirement is applicable in MODES 3*, 4*, and 5*. The * states, “With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.” ITS Function 5 Source Range Neutron Flux channels are required in MODES 3 <sup>(a)</sup> , 4 <sup>(a)</sup> , and 5 <sup>(a)</sup> to perform SR 3.3.1.7. Note <sup>(a)</sup> states, “With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.” The change from Note * to Note <sup>(a)</sup> is addressed by DOC L.11. The ITS SR requires a COT to be performed every 92 days. It is modified by a Note that states, “Not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entering MODE 3.” The change from 31 to 92 days is addressed by DOC L.11. This changes the CTS surveillance requirement by providing an allowance to perform the SR 4 hours after entering the applicable MODE.	SR 3.3.1.7 NOTE	Table 4.3-1 Note(1)	7

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.25	CTS Surveillance Requirements in Table 4.3-1 for Function 21.B, reactor trip bypass breaker, require a CHANNEL FUNCTIONAL TEST to be performed at a refueling (R) Frequency. The Frequency is modified by a Note <sup>(10)</sup> that states, “Automatic undervoltage trip.” Note <sup>(10)</sup> is addressed by DOC LA.4. ITS Table 3.3.1–1 Function 19, Reactor Trip Breakers <sup>(h)</sup> requires the performance of SR 3.3.1.4. Note <sup>(h)</sup> states, “Including any reactor trip bypass breakers that are racked in and closed for bypassing an RTB.” SR 3.3.1.4 requires the monthly testing (TADOT) on a Staggered Test Basis for the trip and bypass breakers. A Note that states, “This Surveillance must be performed on the trip bypass breaker immediately after placing the bypass breaker in service” modifies SR3.3.1.4. This changes the CTS by deleting the surveillance requirement performed on a refueling basis for the RTB bypass breaker.	SR 3.3.1.4 NOTE	Table 4.3-1 Note (10)	5

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.26	CTS Table 3.3-1 Functions 18.a (Low Auto Stop Oil Pressure) and 18.b (Turbine Stop Valve Closure) requires the functions to be OPERABLE in MODE 1 and Action 9 to be entered for an inoperable channel. Action 9 requires an inoperable channel be placed in trip within 72 hours or reduce power to less than P-8 setpoint within the next 4 hours. ITS Table 3.3.1-1 Function 16 Turbine Trip with Low Auto Stop Oil Pressure (16a) and Turbine Stop Valve Closure (16b) lists the applicable MODES as MODE 1 <sup>(8)</sup> . Note <sup>(8)</sup> states, “Above the P-8 (Power Range Neutron Flux) interlock.” The Table lists Condition N to be entered for an inoperable channel. Condition N states, “One Turbine Trip channel inoperable, Place channel in trip,” within 72 hours, or “Reduce THERMAL POWER < P-8,” within 76 hours. A Note modifies Condition N that states, “ The inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels.” This changes the CTS by adding an allowance that an inoperable channel may be bypassed for up to 12 hours for surveillance testing of other channels.	3.3.1 Condition N Note	Table 3.3-1 Action 9	4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.27	CTS Tables 3.3-1 and 4.3-1 list the MODES of applicability for the Intermediate Range function 5 as MODE 1 below the P-10 setpoint and MODE 2. Action 3 must be entered for an inoperable channel. Action 3-part b states "Above the P-6 setpoint, but below the P-10 setpoint, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-10 setpoint." ITS Table 3.3.1-1 Function 4 Intermediate Range lists the Applicable MODES or other specified conditions as MODES 1 <sup>(b)</sup> and 2 <sup>(c)</sup> . Note <sup>(b)</sup> states, "Below the P-10 (Power Range Neutron Flux) interlocks," and Note <sup>(c)</sup> requires, "Above the P-6 (Intermediate Range Neutron Flux) interlocks." Conditions F and G must be entered for an inoperable channel(s). Required Actions F.2 and G.2 limit THERMAL POWER for the unit to < P-6 setpoint. This changes the CTS by decreasing the applicability from MODE 2 to MODE 2 above the P-6 setpoint.	Table 3.3-1 NOTE (c)	Tables 3.3-1 and 4.3-1	2

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.28	CTS Table 3.3-1 Functions 9.) Pressurizer Pressure – Low, 11.) Pressurizer Water Level – High, 12.) Loss of Flow, 16.) Undervoltage – RCP Buses, 17.) Underfrequency – RCP Buses, 18.) Turbine Trip, and 20.) RCP Breaker Position are required to be OPERABLE. Functions 9 and 11 have applicable MODES of 1 and 2, and Functions 12, 16, 17, 18, and 20 have an applicability of MODE 1. Action 8 must be entered for an inoperable channel on Functions 9, 11, 12, 16, 17, and 20. Action 8 requires the inoperable channel to be placed into trip within 72 hours or the unit is required to be placed below P-7 interlock within 78 hours. Action 9 requires an inoperable channel for function 18, Turbine Trip, to be placed into trip within 72 hours or the unit is required to be placed below P-8 interlock within 76 hours. ITS Table 3.3.1–1 Functions 8.a) Pressurizer Pressure–Low, 9.) Pressurizer Water Level – High, 10.) Reactor Coolant Flow – Low, 11.) RCP Breaker Position, 12.) Undervoltage RCPs, and 13.) Underfrequency RCPs require the functions to be OPERABLE in MODE 1 above the P – 7 setpoint. ITS Note <sup>(1)</sup> states, “Above the P–7 (Low Power Reactor Trips Block) setpoint.” The Turbine Trip, Function 16 is required to be OPERABLE in MODE 1 above P–8 setpoint. ITS Note <sup>(6)</sup> states, “Above the P–8 (Power Range Neutron Flux) interlock.” Condition L is required to be entered for an inoperable channel for functions 8.a, 9, 10, 12, and 13. Condition L states for one channel inoperable, “Place channel in trip,” within 72 hours, or “Reduce THERMAL POWER to < P-7,” in 78 hours. Function 11 RCP Breaker Position requires Condition M to be entered for an inoperable channel. Condition M states, “Place channel in trip,” within 72 hours, or “Reduce THERMAL POWER to < P-7,” in 78 hours. Condition N is required to be entered if one Turbine Trip channel becomes inoperable. Condition N states, “Place channel in trip,” within 72 hours, or “Reduce THERMAL POWER < P–8,” within 76 hours. This changes the CTS by stating the applicability for these functions so that they are compatible with their Required Actions.	Table 3.3.1-1	Table 3.3-1	2

Change Category:

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.1 L.29	CTS 3.3.1.1 requirements for Functional Unit 6.C, Source Range Neutron Flux Shutdown, are stated in CTS Table 3.3-1. This requirement is applicable in MODES 3, 4, and 5 with the RTBs open and requires one source range channel to be OPERABLE. When the RTBs are closed and the rod control system is capable of rod withdrawal, the CTS requires two source range channels to be OPERABLE. ITS 3.3.1 requirement for the Source Range Neutron Flux, Function 5, is stated in ITS Table 3.3.1-1. The Table lists the applicability or other specified conditions as MODES 3(e), 4(e), and 5(e). Note (e) states, "With the Rod Control System incapable of rod withdrawal. In this condition, source range Function does not provide reactor trip but does provide indication." When the rod control system is capable of rod withdrawal, the CTS and the ITS require two source range channels to be OPERABLE. When the rod control system is not capable of rod withdrawal, the ITS requires one source range channel to be OPERABLE. This changes the CTS by requiring ITS Function 5 in MODES 3, 4, and 5 when the rod control system is incapable of rod withdrawal instead of MODES 3, 4, and 5 when the RTBs are open. This allows only one source range channel to be OPERABLE in conditions when the CTS would require two source range channels to be OPERABLE.	Table3.3.1-1 Note (e)	Table 3.3.1.1 Function 6(c)	2
3.3.2 L.1	CTS 3.3.2.1 requires the ESFAS instrumentation channels shown in Table 3.3-3 to be OPERABLE. Table 3.3-3 states for function 6(a), Auxiliary Feedwater Pump starts on manual initiation that the total number of channels is 2. The function is required to be OPERABLE in MODES 1, 2, and 3. For an inoperable channel, Action 21 must be entered. ITS 3.3.2 in Table 3.3.2-1 does not require the manual initiation function for AFW pump starts. This changes the CTS by deleting the requirements for manual initiation of AFW pump starts.	None	Table 3.3-3 function 6(a)	1

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.2	CTS requirement 3.3.2.1 for Steam Line Isolation, Functional Unit 4 in Table 3.3-3, requires the function to be OPERABLE with the capabilities to perform a Main Steam isolation. The isolation may be initiated from Manual, Automatic Actuation Containment Pressure – Intermediate High-High, and Steam Flow in Two Steam Lines – High coincident with either T <sub>ave</sub> Low-Low or Steam Line Pressure Low. The steam line isolation functions are required to be OPERABLE in MODES 1, 2, and 3 <sup>##</sup> . ITS LCO 3.3.2 in Table 3.3.2-1 lists the requirement for Steam Line Isolation as Function 4. This requires the function to be OPERABLE with initiation by Manual, Automatic Actuation Logic and Actuation Relays, Containment Pressure Intermediate High-High, High Steam Flow in Two Steam Lines with either T <sub>ave</sub> Low-Low or Steam Line Pressure Low. These initiators are required to be OPERABLE in MODES 1, 2 <sup>(d)</sup> , and 3 <sup>(d)</sup> . Notation <sup>(d)</sup> states, “Except when all MSIVs are closed and de-activated.” This changes the CTS by not requiring the instrumentation channels to be OPERABLE in MODES 2 <sup>(d)</sup> and 3 <sup>(d)</sup> .	Table 3.3.2-1 NOTE (d)	Table 3.3-3	2
3.3.2 L.3	CTS SR 4.3.2.1.3 provides for the Response Time Testing (RTT) of the ESF functions. This is applicable to the steam turbine driven pump start requirement of the CTS function 6 for the automatic start requirements. The AFW pumps are required to start on Steam Generator Water Level Low – Low, Loss of Offsite Power, the Trip of all Main Feedwater Pumps, and any SI signals. ITS SR 3.3.2.9 requires the verification of RTT to be within specific limits. A Note is added to the requirement that provides an exception for the turbine driven AFW pump. The allowance delays the required verification by 24 hours after Main Steam pressure reaches 1005 psig. This changes the CTS by allowing the RTT verification to be delayed for 24 hours after the unit reaches a stable condition for testing.	SR 3.3.2.9 NOTE	4.3.2.1.3	6

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



Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.4	CTS Table 4.3-2 notation (1) is associated with the manual initiation switches for Safety Injection, Containment Spray, Containment Isolation (Phase A and B), Steam Line Isolation, and the start of the AFW pumps. The notation requires that each manual actuation switch be tested to actuate the required function at least once per 18 months during shutdown. In ITS Table 3.3.2-1, for each of the listed functions, SR 3.3.2.7 states that a TADOT must be performed at a frequency of eighteen months. This changes the CTS by deleting the “during shutdown” requirement and requires the test be performed every 18 months.	SR 3.3.2.7	Table 4.3-2 NOTE (1)	7
3.3.2 L.5	CTS 3.3.2.1 requirements listed in Table 3.3-3 for P-11 specifies two limits for the Allowable Value. The P-11 function allowable value of: ≤ 2010 psig prevents manual block of Safety Injection (SI) on Low Low Pressurizer Pressure; and ≤ 1990 psig allows the manual block of SI on Low Low Pressurizer Pressure. ITS 3.3.1 requirements in Table 3.3.1-1 for Reactor Trip System interlock P-11 lists only the allowable value that prevents manual block of the function. This value is ≤ 2010 psig. This changes the CTS by eliminating the P-11 interlock value for allowing manual function block.	Table 3.3.2-1	Table 3.3.-3	1

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.6	CTS Table 3.3-3 for Functional Units 5.a and 5.b, Turbine Trip and Feedwater Isolation on Steam Generator (SG) Water Level – High-High and Automatic Actuation Logic and Actuation Relays, requires for each an applicability of MODES 1, 2, and 3 <sup>###</sup> . Notation <sup>###</sup> states, “Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” ITS Table 3.3.2 – 1 for Function 5, Turbine Trip and Feedwater Isolation, requires that Functions 5.a and 5.b, Automatic Actuation Logic and Actuation Relays and SG Water Level – High High, be OPERABLE in MODES 1, 2 <sup>(e)</sup> , and 3 <sup>(e)</sup> . Note <sup>(e)</sup> states, “Except when all Main Feedwater pump discharge valves or all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” This changes the CTS by modifying the MODES 2 and 3 applicability with the addition of the Main Feedwater (MFW) pump discharge valves to the list.	Table 3.3.2-1 NOTE (3)	Table 3.3-3 Note ###	2

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.2 L.7	CTS Table 3.3-3 for Functional Units 5.a and 5.b, Turbine Trip and Feedwater Isolation on Steam Generator (SG) Water Level – High-High and Automatic Actuation Logic and Actuation Relays, requires for each an applicability of MODES 1, 2, and 3 <sup>###</sup> . Notation <sup>###</sup> states, “Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” ITS Table 3.3.2 – 1 for Function 5, Turbine Trip and Feedwater Isolation, requires that Functions 5.a and 5.b, Automatic Actuation Logic and Actuation Relays and SG Water Level – High High, be OPERABLE in MODES 1, 2 <sup>(e)</sup> , and 3 <sup>(e)</sup> . Note <sup>(e)</sup> states, “Except when all Main Feedwater pump discharge valves or all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.” The Main Feedwater pump discharge valves addition is addressed by DOC L.6. This changes the CTS by stating the Functions 5.a and 5.b are not applicable in MODE 2 when appropriate valves are closed and provide the required safety function.	Table 3.3.2-1 Function 5	Table 3.3-3	2
3.3.3 L.1	CTS 3.3.3.6 Action a requires the restoration of PAM instrumentation channels within seven days whenever one required channel is inoperable or the unit to be shutdown within the next 12 hours. CTS 3.6.4.1 Action a requires the restoration of an inoperable hydrogen analyzer within thirty days with one analyzer inoperable. ITS 3.3.3 Conditions A and B require the restoration of post accident instrumentation channels within thirty days or the initiation of a special report. This changes the CTS by deleting the requirements for the unit to be in HOT SHUTDOWN within the next 12 hours with one inoperable channel for a Function that has two required channels, allowing an additional restoration time, and instead requiring a report to be made in accordance with Specification 5.6.6.	None	3.3.3.6 Action a 3.6.4.1 Action a	3,4

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.3 L.2	CTS 3.3.3.6 Action b requires the restoration of inoperable PAM instrumentation channels within forty-eight hours whenever both required channels for a Function are inoperable. CTS 3.6.4.1 Action b. allows 7 days to restore one hydrogen analyzer to OPERABLE status when both are inoperable. ITS 3.3.3 Condition C requires the restoration of inoperable PAM instrumentation channels within seven days. This changes the CTS by allowing an additional five days for restoration of an inoperable instrumentation channel for a Function that has two inoperable channels.	3.3.3 Condition C	3.6.4.1 Action b	3
3.3.3 L.3	CTS SR 4.6.4.1 states, in part, "Each hydrogen analyzer shall be demonstrated OPERABLE at least once per 92 days on a STAGGERED TEST BASIS by performing a CHANNEL CALIBRATION." Under the CTS definition of STAGGERED TEST BASIS, both hydrogen analyzer channels must be tested every 92 days in equal subintervals. ITS SR 3.3.3.2 states a CHANNEL CALIBRATION must be performed at a frequency of every 92 days. This changes the CTS for the hydrogen analyzer by eliminating the STAGGERED TEST BASIS (STB) requirement that the hydrogen analyzers be tested in equal subintervals of the Frequency.	SR 3.3.3.2	SR 4.6.4.1	7
3.3.3 L.4	Not used.	N/A	N/A	N/A
3.3.3 L.5	CTS 3.3.3.6 in Table 3.3-10 requires the following functions to be OPERABLE: 8) Refueling Water Storage Tank, 9) Boric Acid Tank Solution Level, 10) Auxiliary Feedwater Flow Rate, 12) PORV Position Indicator, 13) PORV Block Valve Position Indication, 14) Safety Valve Position Indication, and 16) Containment Water Level. ITS 3.3.3 does not require these functions to be OPERABLE. This changes the CTS by deleting these functions from the post accident monitoring functions.	None	Table 3.3-10 functions 8, 9, 10, 12, 13, 14 and 16	1

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

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

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.3 L.9	CTS Table 3.3-6 requires 2 channels of the Containment High Range Area Monitors to be OPERABLE. Surveillance Requirements of a CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, CHANNEL CALIBRATION are required to be performed per CTS Table 4.3-3. The ITS includes Surveillance Requirements for a CHANNEL CHECK and a CHANNEL CALIBRATION to be performed on PAM function 11. This changes the CTS by eliminating the CHANNEL FUNCTIONAL TEST for the PAM instrument.	None	Table 4.3-3	5
3.3.4 L.1	CTS 3.3.3.5 states that the auxiliary shutdown panel monitoring instrumentation listed in Table 3.3-9 shall be OPERABLE. Function 9 of the table lists the Relay Room Positive Ventilation requirement. This requires one channel to be OPERABLE and indicate from 0 to 0.5 inches of water pressure. A CHANNEL CHECK is required once a month and a CHANNEL CALIBRATION is required each refueling. ITS 3.3.4 in Table 3.3.4-1 does not require the Relay Room Positive Ventilation instrumentation channel to be OPERABLE. This changes the CTS requirements by eliminating the Relay Room Ventilation pressure from the required channel requirements.	None	Table 3.3-9 Function 9	1
3.3.4 L.2	Unit 2 CTS 3.3.3.5 requires in Action a, that an inoperable channel(s) will either be returned to OPERABLE status within 7 days, or the unit must be shutdown. Unit 1 CTS 3.3.3.5 requires in Action a, that an inoperable channel(s) will either be returned to OPERABLE status within 30 days, or the unit must be shutdown. ITS LCO 3.3.4 Action A states that with one or more required functions inoperable, the required function will be restored to OPERABLE status within 30 days. This changes the Unit 2 CTS requirements for restoring a required function from 7 to 30 days.	3.3.4 Action A	CTS 3.3.3.5 Action a	3

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

Table L – Less Restrictive Changes  
ITS Section 3.3 – Instrumentation

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.3.5 L.1	CTS Table 3.3-3 for ESFAS instrumentation states the total number of channels as three for the loss of power (LOP) functions (loss of voltage and degraded voltage). CTS Action 19 is required to be entered for an inoperable channel, and the inoperable channel is required to be placed in the tripped condition within 72 hours. ITS LCO 3.3.5 states the total number of required channels as three for each function. ITS Condition B states, "One or more Functions with two or more channels per bus inoperable, restore all but one channel to OPERABLE status in 1 hour." This changes the CTS to allow more than one channel for the functions to be inoperable	3.3.5 ACTION B	3.3-3 Action 19	4
3.3.5 L.2	CTS 3.3.2, Action 19, states that with the number of OPERABLE channels one less than the total number of channels, STARTUP and POWER OPERATION may proceed provided the inoperable channel is placed in trip within 72 hours. ITS 3.3.5 Action C states, "When the Required Action and associated Completion Time not met," immediately enter applicable Condition(s) and Required Action(s) for the associated EDG made inoperable by LOP EDG start instrumentation. This changes the CTS by allowing the associated EDG to be declared inoperable instead of the declaring the LOP function inoperable, entering LCO 3.0.3, and shutting down the unit.	3.3.5 ACTION C	3.3.2 Action 19	4
3.3.5 L.3	CTS Table 3.3-4 for function 7.a, Loss of Power 4160 Volt Emergency Bus Undervoltage (Loss of Voltage) states an Allowable Value of $\geq 2989$ volts. SR 3.3.5.2 states that a CHANNEL CALIBRATION is performed with an Allowable Value for the Loss of Voltage set to 2935 volts. This changes the CTS by decreasing the Allowable Value for the Loss of Voltage from 2989 to 2935 volts.	SR 3.3.5.2	Table 3.3-4	1

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.1 L.1	CTS 4.2.5.2 states that the Reactor Coolant System total flow rate shall be determined to be within its limit by measurement at least once per 18 months. ITS SR 3.4.1.4 requires measurement of the RCS total flow rate every 18 months and is modified by a Note which states, "Not required to be performed until 30 days after $\geq 90\%$ RTP." This changes the CTS by relaxing the Surveillance Frequency in order to allow entry into MODE 1 to perform the test and requires the test to be performed within 30 days after exceeding 90% RTP.	SR 3.4.1.4	4.2.5.2	7
3.4.2 L.1	CTS Surveillance 4.1.1.5 states that the RCS $T_{avg}$ shall be determined to be $\geq 541$ °F within 15 minutes prior to achieving reactor criticality and every 30 minutes when the RCS $T_{avg} < 547$ °F and the $T_{avg} - T_{ref}$ Deviation Alarm is not reset. ITS Specification 3.4.2 requires RCS $T_{avg}$ in each loop to be verified to be $\geq 541$ °F every 12 hours. Under ITS SR 3.0.4, a Surveillance must be performed within the specified Frequency prior to entering the MODE or other specified condition in the Applicability. This changes the CTS Surveillance Frequency by requiring that the RCS $T_{avg}$ for each loop be verified every 12 hours	SR 3.4.2.1	4.1.1.5	7
3.4.3 None	N/A	N/A	N/A	N/A
3.4.4 L.1	CTS 3.4.1.1 states that when the reactor coolant loop requirements are not met, the unit must be in HOT STANDBY within 1 hour. ITS 3.4.4 states that when the reactor coolant loop requirements are not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by relaxing the Completion Time from 1 hour to 6 hours.	3.4.4	3.4.1.1	3

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



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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.5 L.1	CTS 3.4.1.2, Note "*" states that all reactor coolant pumps may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. 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 LCO 3.4.5 Note 1 states that all reactor coolant pumps may be removed from operation provided no operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1. ITS 3.4.5, Action C states that if two required RCS loops are inoperable or the required RCS loop(s) are 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 RCS loops to operable status and operation. This relaxes the CTS Required Actions by revising 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.	LCO 3.4.5 Note 1 and Action C	3.4.1.2 Note "*" and Action b	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.5 L.2	CTS 4.4.1.2.1 states that the required RCPs, if not in operation, shall be determined to be OPERABLE once per 7 days by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.5.3 requires verification of correct breaker alignment and indicated power availability to the required pump not in operation every 7 days. It is modified by a Note which states, "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.5.3 Note	4.4.1.2.1	7
3.4.6 L.1	CTS 3.4.1.3, Action a, states that with less than the two required coolant loops OPERABLE, action must be immediately initiated to return the required loops to OPERABLE status as soon as possible and to be in COLD SHUTDOWN within 20 hours. ITS 3.4.6, Action A, states that when one required loop is inoperable, action must be initiated immediately to restore the required loop to OPERABLE status. Action A also requires the plant to be in MODE 5 within 24 hours, but only if an RHR loop is OPERABLE. This changes the CTS by providing an exception to the requirement to be in MODE 5 and allowing 24 hours instead of 20 hours to reach MODE 5.	3.4.6 Action A	3.4.1.3 Action a	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.6 L.2	CTS 4.4.1.3.2 states that the required pumps, if not in operation, shall be determined to be OPERABLE once per 7 days by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.6.3 requires verification of correct breaker alignment and indicated power availability to the required pump that is not in operation every 7 days. It is modified by a Note which states, "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.6.3 Note	4.4.1.3.2	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.6 L.3	CTS 3.4.1.3, Note "*" states that all reactor coolant pumps and RHR pumps may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. CTS 3.4.1.2, Action b , states that when no coolant loop is 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 LCO 3.4.6 Note 1 states that all reactor coolant pumps and RHR pumps may be removed from operation provided no operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1. ITS 3.4.6, Action B states that if two required loops are inoperable or the required loop(s) are 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 loop to operable status and operation. This relaxes the CTS Required Actions by revising 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.	LCO 3.4.6 Note 1 and Action B	3.4.1.3 Note "*" and 3.4.1.2 Action b	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.7 L.1	CTS 3.4.1.3 states that a coolant loop used to satisfy the LCO requirements must consist of an RHR subsystem or a reactor coolant loop, its associated steam generator, and reactor coolant pump (RCP). CTS Surveillance 4.4.1.3.4 requires verification that one RHR loop or reactor coolant pump is in operation every 12 hours. ITS 3.4.7 states that a steam generator with a secondary side water level of 17% may be used to satisfy the LCO requirements. CTS SR 4.4.1.3.3 also states this requirement. This changes the CTS by eliminating the requirement that an RCS loop used to meet the LCO must have an OPERABLE RCP. ITS Surveillance 3.4.7.1 does not require verification than a reactor coolant pump is in operation.	None	3.4.1.3, 4.4.1.3.3 and 4.4.1.3.4	1
3.4.7 L.2	ITS 3.4.7 contains a Note which allows one required RHR loop to be inoperable for up to 2 hours for surveillance testing provided that the other RHR loop is OPERABLE and in operation. This allowance does not exist in CTS 3.4.1.3.	LCO 3.4.7 Note	3.4.1.3	1
3.4.7 L.3	CTS 4.4.1.3.2 states that the required pumps, if not in operation, shall be determined to be OPERABLE once per 7 days by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.7.3 requires verification of correct breaker alignment and indicated power availability to the required pump that is not in operation every 7 days. It is modified by a Note which states, "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.7.3 Note	4.4.1.3.2	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.7 L.4	CTS 3.4.1.3, Note "*" states that all reactor coolant pumps and RHR pumps may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. CTS 3.4.1.2, Action b , states that when no coolant loop is 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 LCO 3.4.7 Note 1 states that all reactor coolant pumps and RHR pumps may be removed from operation provided no operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1. ITS 3.4.7, Action C states that if no required loops are OPERABLE or the required RHR 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 loop to operable status and operation. This relaxes the CTS Required Actions by revising 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.	LCO 3.4.7 Note 1 and Action C	3.4.1.3 Note "*" and Action b	4
3.4.8 L.1	ITS 3.4.8 contains a Note which allows one required RHR loop to be inoperable for up to 2 hours for surveillance testing provided that the other RHR loop is OPERABLE and in operation. This allowance does not exist in CTS 3.4.1.3.	LCO 3.4.8 Note	3.4.1.3	1

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.8 L.2	CTS 4.4.1.3.2 states that the required pumps, if not in operation, shall be determined to be OPERABLE once per 7 days by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.8.2 requires verification of correct breaker alignment and indicated power availability to the required pump that is not in operation every 7 days. It is modified by a Note which states, "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.8.2 Note	4.4.1.3.2	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.8 L.3	CTS 3.4.1.3, Note "*" states that all reactor coolant pumps and RHR pumps may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. CTS 3.4.1.3, Action b , states that when no coolant loop is 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 LCO 3.4.8 Note 1 states that all reactor coolant pumps and RHR pumps may be removed from operation provided no operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1. ITS 3.4.8, Action B states that if no required loops are OPERABLE or the required RHR 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 loop to operable status and operation. This relaxes the CTS Required Actions by revising 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.	LCO 3.4.8 Note 1 and Action B	3.4.1.3 Note "*" and 3.4.1.3 Action b	4
3.4.9 L.1	CTS 3.4.4, action b, requires that the plant be in HOT STANDBY with the reactor trip breakers open within 6 hours. ITS 3.4.9, Action A, also requires that the plant be in MODE 3 within 6 hours for this Condition, but requires that the rods be fully inserted and the Rod Control System be in a condition incapable of rod withdrawal. This changes the CTS by not specifically requiring that the RTBs be open.	3.4.9 Action A	3.4.4 Action b	4

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



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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.10 L.1	CTS 3.4.2 requires a safety valve to be OPERABLE in MODE 4. ITS 3.4.10 requires three safety valves to be OPERABLE in MODE 4 with all RCS cold leg temperatures > 235°F (Unit 1), 270°F (Unit 2). This changes the operating regime within MODE 4 in which pressurizer safety valves are required to be OPERABLE. The change in the number of required safety valves is discussed in DOC M.3	3.4.10	3.4.2	2
3.4.10 L.2	CTS 3.4.2 Action states that with no pressurizer safety valve OPERABLE in MODE 4, immediately suspend positive reactivity changes and place an OPERABLE RHR loop into operation. ITS 3.4.10 states that with one pressurizer safety valve inoperable in MODE 4 with all RCS cold leg temperature > 235 °F (Unit 1), 270°F (Unit 2), restore the valve to OPERABLE status within 15 minutes. If in MODE 4 the valve is not restored within that time, or if two or more pressurizer safety valves are inoperable, be in MODE 4 with any RCS cold leg temperature ≤ 235°F (Unit 1), 270°F (Unit 2) within 12 hours. This changes the CTS actions to be taken in MODE 4 when one or more pressurizer safety valves are inoperable.	3.4.10	3.4.2 Action	4
3.4.10 L.3	CTS LCOs 3.4.3.1 and 3.4.2 provide requirements on the pressurizer code safety valves in MODES 1, 2, 3, and 4. The ITS LCO 3.4.10 Applicability is modified by a Note which allows the lift settings to not be within the LCO limits during MODES 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions. The exception is allowed for 54 hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup. This changes the CTS by allowing entry into MODES 3 and 4 without verifying that the pressurizer code safety valve lift settings are within the LCO limits.	LCO 3.4.10 Applicability Note	3.4.2 and 3.4.3.1	2

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.10 L.4	CTS 3.4.3.1 states that with one pressurizer code safety valve inoperable, be in HOT SHUTDOWN within 12 hours. ITS 3.4.10 states that with one pressurizer safety valve inoperable, be in MODE 4 with any RCS cold leg temperature $\leq 235$ °F (Unit 1), 270 °F (Unit 2) within 24 hours. The change in the end condition is discussed in DOC M.2. This changes the CTS by allowing 24 hours vice 12 hours to reach the end condition.	3.4.10	3.4.3.1	3
3.4.11 L.1	CTS 4.4.3.2.2 requires testing of each block valve every 92 days. CTS 4.4.3.2.1.b.1 requires operating a PORV through one complete cycle of full travel at least once per 18 months. ITS SR 3.4.11.2 and 3.4.11.3 modify these CTS Surveillances with a Note which states, "Only required to be performed in MODES 1 and 2." This changes the CTS by allowing entry into MODE 3 prior to performing the Surveillance.	SR 3.4.11.2 and 3.4.11.3 Notes	4.4.3.2.2 and 4.4.3.2.1.b.1	7
3.4.11 L.2	CTS 3.4.3.2, Action B, applies when one or both block valves are inoperable. ITS 3.4.11, Action D and G, apply when one or both block valves, respectively, are inoperable. ITS 3.4.11, Actions D and G, are modified by a Note which states that the Required Actions are not applicable when the block valve is inoperable solely as a result of complying with Required Actions C.2 and F.2. ITS Required Actions C.2 and F.2 require power to be removed from the block valve and apply when the associated PORV is inoperable. This changes the CTS by eliminating the requirement to declare the block valve inoperable when power is removed because the associated PORV is inoperable.	None	3.4.3.2 Action B	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.11 L.3	CTS 3.4.3.2, Action A.3, states, "With one or both PORV(s) inoperable due to a malfunction in the PORV automatic control system, within 1 hour restore the affected automatic control system(s) to OPERABLE status or place and maintain the affected PORV(s) in manual control." CTS 4.4.3.2.1.a required performance of a Channel Functional Test every 31 days and CTS 4.4.3.2.1.b.3 requires a Channel Calibration of the actuation instrumentation every 18 months. ITS 3.4.11 does not require the PORV automatic control system for OPERABILITY. This changes the CTS by eliminating the LCO requirement and SRs for the PORV automatic control system.	None	3.4.3.2 Action A.3 4.4.3.2.1.a 4.4.3.2.1.b.3	1
3.4.11 L.4	CTS 4.4.3.2.2 states that each block valve shall be cycled unless the block valve is closed in order to meet the requirements of ACTION A.4 or A.5. ACTIONS A.4 and A.5 require the block valve to be closed for reasons other than excessive PORV seat leakage. ITS SR 3.4.11.2 states that each block valve shall be cycled, but it is modified by a Note stating that the SR is not required to be performed with the block valve closed in accordance with the Required Actions. This changes the CTS by not requiring a cycle of the block valve when the block valve is closed due to excessive PORV seat leakage.	SR 3.4.11.2	4.4.3.2.2	7
3.4.12 L.1	CTS 3.4.9.3, Action c, allows 8 hours to depressurize the RCS and establish an RCS vent when both PORVs are inoperable. ITS 3.4.12, Action G, allows to depressurize the RCS and establish an RCS vent when both PORVs are inoperable. This changes the CTS by allowing 12 hours vice 8 hours to depressurize and vent the RCS when both PORVs are inoperable.	3.4.12 Action G	3.4.9.3 Action c	3

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.12 L.2	CTS 3.4.9.3.e states that in the event either the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 5.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence. The ITS does not have a similar requirement. This changes the CTS by eliminating a Special Report.	None	3.4.9.3.e	8
3.4.13 L.1	CTS Surveillance 4.4.6.2.1.d requires the performance of a Reactor Coolant System water inventory balance at least once per 72 hours during steady state operation. ITS SR 3.4.13.1 also requires that RCS operational leakage be verified to be within its limits by performance of an RCS water inventory balance every 72 hours during steady state operation. In addition, ITS SR 3.4.13.1 contains a Note which states that the Surveillance is not required to be performed until 12 hours after establishment of steady state operation. This changes the CTS by providing an exception to the Surveillance Frequency.	SR 3.4.13.1 Note	4.4.6.2.1.d	7
3.4.13 L.2	CTS Surveillances 4.4.6.2.1.a, 4.4.6.2.1.b, and 4.4.6.2.1.e require monitoring of the containment atmosphere particulate radioactivity monitor and the containment sump inventory and discharge every 12 hours, and the reactor head flange leakoff temperature every 24 hours. The ITS does not contain these Surveillance Requirements. This changes the CTS by eliminating these Surveillance Requirements.	None	4.4.6.2.1.a, 4.4.6.2.1.b, and 4.4.6.2.1.e	5

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.14 L.1	CTS 3.4.6.2 is applicable in MODES 1, 2, 3, and 4. ITS 3.4.14 is applicable in MODES 1, 2, and 3, and MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. SR 3.4.14.1, Note 2, exempts RHR PIVs from the leakage surveillance when in the shutdown cooling mode of operation. This changes CTS by exempting the RHR isolation PIVs from the leakage requirements when those valves are open.	3.4.14: Applicability and SR 3.4.14.1Note 2	3.4.6.2	2
3.4.14 L.2	CTS 3.4.6.2 does not contain an ACTION for more than one flow path with RCS PIVs inoperable. In this condition, entry into LCO 3.0.3 is required. ITS 3.4.14 contains ACTION Note 1 which allows separate condition entry for each flow path. This changes the CTS by allowing the Completion Times to apply to each flow path and prevents an LCO 3.0.3 entry should more than one RCS PIV flow path be inoperable.	3.4.14 Action Note 1	3.4.6.2	4
3.4.14 L.3	CTS 3.4.6.2, Actions b and c, requires a shutdown to MODE 3 in 6 hours and MODE 5 in the following 30 hours when leakage from required RCS PIVs is greater than the limit. ITS 3.4.14, ACTION A allows 4 hours to restore RCS PIV leakage to within limit. If the RCS PIV leakage can not be restored within limit within 4 hours, the ITS requires a shutdown to MODE 3 in 6 hours and MODE 5 in the following 30 hours. This changes the CTS by allowing up to 4 hours to restore RCS PIV leakage to within limit instead of requiring an immediate shutdown.	3.4.14 Action A	3.4.6.2 Action c	4

Change Category:

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.14 L.4	CTS Surveillance 4.4.6.2.2.b requires testing of RCS PIVs prior to entering MODE 2 whenever the plant has been in Cold Shutdown for 72 hours or more and if leakage testing has not been performed in the previous 9 months. ITS SR 3.4.14.1 requires testing of RCS PIVs prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months. This changes the CTS by allowing shutdowns to MODE 5 from 3 to 7 days in length without requiring RCS PIV testing.	SR 3.4.14.1	4.4.6.2.2.b	7
3.4.14 L.5	CTS Surveillance 4.4.6.2.2.c requires testing of RCS PIVs following maintenance, repair, or replacement work on the valve. ITS 3.4.14 does not include this requirement. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	None	4.4.6.2.2.c	5
3.4.14 L.6	Unit 2 CTS Surveillance 4.4.6.2.2.d requires testing of RCS PIVs within 24 hours following a valve 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. This changes the CTS by allowing valve testing to not be performed if it would result in a repetitive testing loop.	SR 3.4.14.1 Note 3	4.4.6.2.2.d	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.14 L.7	Unit 1 CTS Surveillance 4.4.6.2.2 requires each RCS PIV specified in CTS Table 3.4-1 be demonstrated OPERABLE by verifying leakage to be within its limit. The Unit 1 leakage limit is 1 gpm to 5 gpm, depending of the results of past tests. In addition, the minimum differential test pressure must be 150 psid or greater. The Unit 2 CTS Surveillance 4.4.6.2.2 requires each RCS PIV specified in CTS Table 3.4-1 be tested in accordance with Specification 4.0.5 (the Inservice Test Program). This requirement is modified by a footnote to LCO 3.4.6.2.f which states that the leakage limit for any RHR system isolation valve shall be 5 gpm. ITS SR 3.4.14.1 requires verification of leakage from each RCS PIV required to be tested equivalent to 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig. This changes the Unit 1 and Unit 2 Surveillance acceptance criteria.	3.4.14.1	Footnote to LCO 3.4.6.2.f and 4.4.6.2.2	6
3.4.15 L.1	Not Used	N/A	N/A	N/A
3.4.15 L.2	CTS 3.4.6.1 ACTION does not include an exclusion allowing a delay in performing an RCS water inventory balance. ITS 3.4.15 REQUIRED ACTIONS A.1 and B.1.2 include NOTES that state, “Not required until 12 hours after establishment of steady state operation.” This changes the CTS by allowing 12 hours after establishment of steady state operation AND after entering the respective Conditions before an RCS water inventory balance must be performed.	3.4.15 Required Actions A.1 and B.1.2 Notes	3.4.6.1	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.15 L.3	CTS 3.4.6.1.a states, “The following Reactor Coolant System leakage detection systems shall be OPERABLE: a. The containment atmosphere particulate and gaseous radioactivity monitoring system, and...” ITS 3.4.15.b states, “The following RCS leakage detection instrumentation shall be OPERABLE: ...One containment atmosphere radioactivity monitor (gaseous or particulate).” This changes the CTS by requiring only one containment atmosphere radioactivity monitor, gaseous or particulate, instead of two.	3.4.15.b	3.4.6.1.a	1
3.4.15 L.4	CTS 3.3.3.1 Table 4.3-3 requires a monthly Channel Functional Test for the containment RCS leakage detection radiation monitors. ITS SR 3.4.15.2 requires a Channel Operational Test be performed every 92 days. This changes the CTS by increasing the Frequency for the test from monthly to 92 days.	SR 3.4.15.2	Table 4.3-3	7
3.4.16 L.1	CTS 3.4.8 is applicable in MODES 1, 2, 3, 4, and 5. ITS 3.4.16 is applicable in MODES 1 and 2, and MODE 3 with RCS T <sub>avg</sub> ≥ 500 °F. This changes the CTS by reducing the MODES in which the LCO is applicable.	3.4.16	3.4.8	2
3.4.16 L.2	Not Used	N/A	N/A	N/A
3.4.16 L.3	CTS Table 4.4-4, Item 1, requires gross activity determination at least once per 72 hours. ITS SR 3.4.16.1 requires verification that the reactor coolant gross specific activity ≤ 100 / $\overline{E}$ μCi/gm every 7 days. This changes the CTS by reducing the Frequency from 72 hours to 7 days.	SR 3.4.16.1	Table 4.4-4 Item 1	7

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



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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.16 L.4	CTS Table 4.4-4, Item 4, requires isotopic analysis for iodine once per 4 hours when the specific activity exceeds $100 / \bar{E}$ $\mu\text{Ci/gm}$ . The ITS does not contain this Action. This changes the ITS by eliminating a conditionally performed Surveillance when gross activity exceeds $100 / \bar{E}$ $\mu\text{Ci/gm}$ .	None	3.4.8 Action a and Table 4.4-4 Item 4	4
3.4.16 L.5	CTS Table 4.4-4, Item 3, requires radiochemical determination of $\bar{E}$ once per 6 months. Footnote * states that the sample is to be taken after a minimum of 2 EFPD and 20 days of POWER OPERATION have elapsed since the reactor was last subcritical for 48 hours or longer. ITS SR 3.4.16.3 requires $\bar{E}$ to be determined from a sample taken in MODE 1 after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours. ITS SR 3.4.16.3 is modified by a Note which states, "Not required to be performed until 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for $\geq 48$ hours. This changes the CTS by putting a limit, 31 days, on when the Surveillance must be performed after the requisite conditions are met.	SR 3.4.16.3 Note	Table 4.4-4 Item 3 and Footnote "*"	7

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.17 L.1	CTS 3.4.1.1 requires that all reactor coolant loops be in operation with power removed from the loop stop valve operators. CTS 3.4.1.1 does not contain an Action for power available to one or more of the loop stop valve operators and, in this condition, LCO 3.0.3 would be entered. ITS 3.4.17 requires that when power is available to one or more loop isolation valve operators that the power must be removed within 30 minutes. The Actions are modified by a Note that states that separate condition entry is allowed for each RCS loop isolation valve. If power is not removed within 30 minutes, LCO 3.0.3 would be entered. This changes the CTS by allowing 30 minutes per isolation valve to remove power from the isolation valve operator before entering LCO 3.0.3.	3.4.17 Actions Note	3.4.1.1	4

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.18 L.1	CTS 3.4.1.4 states that the boron concentration of an isolated loop is to be maintained greater than equal to the boron concentration corresponding to the SHUTDOWN MARGIN requirements of Specification 3.1.1.1 or 3.1.1.2 as applicable for the active volume of the Reactor Coolant System unless the loop has been drained for maintenance. CTS 3.4.1.4 Action contains the actions to be taken when the loop isolation valves are closed but the boron concentration of the isolated loop is less than required. CTS Surveillance 4.4.1.4 requires that the boron concentration of the isolated loop must be verified to be within limits at least once per 24 hours. ITS 3.4.18 states that the hot and cold leg isolation valves of a filled, isolated loop must remain closed if the boron concentration of the isolated loop is less than the boron concentration required to meet the SDM of LCO 3.1.1 or the boron concentration of LCO 3.9.1. If the loop isolation valves are opened without the isolated loop boron concentration requirement being met, the loop isolation valves must be closed. This changes the CTS LCO requirement (and the corresponding Action and Surveillance) by eliminating the ongoing requirement that the boron concentration of an isolated loop be equal to or greater than the concentration of the operating loops unless the loop has been drained for maintenance and applying requirements on boron concentration only when a loop isolation valve is to be opened. The addition to reference to LCO 3.9.1 is addressed in DOC A.2.	None	3.4.1.4 and 4.4.1.4	1 and 6

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.4.18 L.2	CTS Surveillance 4.4.1.6.3 requires that the source range neutron flux monitor be demonstrated OPERABLE by a CHANNEL FUNCTIONAL TEST within 8 hours prior to commencing isolated loop backfill and a CHANNEL CHECK at least once per 15 minutes during backfilling of an isolated loop. ITS 3.4.18 does not contain these requirements. This changes the CTS by eliminating a CHANNEL FUNCTIONAL TEST and periodic CHANNEL CHECKS from the process of backfilling a drained loop from the active RCS volume.	None	4.4.1.6.3	5
3.4.18 L.3	CTS LCO 3.4.1.5 and CTS LCO 3.4.1.6 require that the stop valves remain closed with A.C. power removed and its breaker locked open unless certain conditions are satisfied. The CTS LCO 3.4.1.5 Note *, CTS 3.4.1.5 Action, and CTS 3.4.1.6 Actions b and d also specify that A.C. power be removed from the valve(s) and the breaker locked open. ITS 3.4.18 and ITS 3.4.18 Action F state that an RCS loop shall remain isolated with power removed from the valve unless certain conditions are satisfied. This changes the CTS by removing the LCO requirement (and corresponding Action and Notes requirements) that the isolation valve breaker be locked open.	None	3.4.1.5 , 3.4.1.6, and Note to 3.4.1.5	1

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

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

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

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
CTS 3.7.9.2 L.2	CTS Surveillance 4.7.9.2.b.1 requires, every 31 days, the cycling of each testable, remote or automatically operated valve in the RHR subsystem flowpath through at least one complete cycle. CTS Surveillance 4.7.9.2.b.2 states that the correct position of each manual valve in the RHR subsystem flowpath that is not locked, sealed, or otherwise secured in position must be verified at least once per 31 days. CTS Surveillance 4.7.9.2.b.3 requires that the correct position of each remote or automatically operated valve in the RHR subsystems flowpath must be verified to be in the correct position at least once per 31 days. The ITS does not contain these requirements.	None	4.7.9.2.b.1, 4.7.9.2.b.2 and 4.7.9.2.b.3	5
CTS 3.7.9.2 L.3	CTS Surveillance 4.7.9.2.a requires that the RHR subsystem be demonstrated OPERABLE by verifying isolation of the RHR system prior to the Reactor Coolant System pressure exceeding 500 psig by closing and de-energizing both remote operated RHR suction isolation valves and locking the associated breakers. The ITS does not contain this requirement.	None	4.7.9.2.a	5
CTS 3.7.9.2 L.4	CTS 3.7.9.2 states that one RHR subsystem shall be OPERABLE in MODES 4 and 5. CTS 3.4.1.3 states that at least two coolant loops shall be OPERABLE and at least one must be in operation in MODES 4 and 5. The two coolant loops may consist of any combination of RCS and RHR loops. ITS 3.4.6 states that two loops consisting of any combination of RCS loops and RHR loops shall be OPERABLE and one loop shall be in operation. ITS 3.4.7 and 3.4.8 require on RHR subsystem to be OPERABLE in MODE 5. This changes the CTS by eliminating the requirement that one RHR subsystem be OPERABLE in MODE 4.	None	3.7.9.2	1

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

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

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
CTS 3.7.9.2 L.5	CTS 3.7.9.2 Action states that when no RHR subsystem is OPERABLE, immediate action must be taken to restore an RHR subsystem to OPERABLE status or maintain RCS temperature less than 350°F by use of alternate heat removal methods. ITS 3.4.6 states that when one required cooling loop is inoperable, immediate action must be taken to restore a second loop to OPERABLE status. That second loop may be an RHR loop or an RCS loop. ITS 3.4.7 and 3.4.8 states that if no RHR loop is OPERABLE in MODE 5, immediate action must be taken to restore the inoperable loop. This changes the CTS by eliminating the requirement to immediately restore an RHR loop to OPERABLE status in MODE 4. The requirement to maintain RCS temperature less than 350°F by alternate heat removal methods is unchanged as, in this context, the OPERABLE RCS loop is an alternate heat removal method and heatup above 350°F (i.e., to MODE 3) is prohibited by ITS LCO 3.0.4.	None	3.7.9.2	4

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

Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.1 L.1	The CTS 3.5.1 Applicability is MODES 1, 2, and 3. The MODE 3 applicability is modified by a footnote that states, “Pressurizer Pressure above 1000 psig. Power lock out of valves is not permitted in MODE 3 when below 1000 psig.” The ITS 3.5.1 Applicability is MODES 1 and 2, and MODE 3 with RCS pressure > 1000 psig. This changes the CTS by eliminating the CTS Applicability statement, “Power lock out of valves is not permitted in MODE 3 when below 1000 psig.”	3.5.1 Applicability	3.5.1 Applicability	2
3.5.1 L.2	CTS 3.5.1 Action a states that an inoperable accumulator must be restored to OPERABLE status within one hour, except as a result of a closed isolation valve. ITS 3.5.1 ACTION A.1 states that if one accumulator is inoperable due to boron concentration not within limits, it must be restored to OPERABLE status within 72 hours. This changes CTS by increasing the time one accumulator may be inoperable due to boron concentration not within limits from 1 hour to 72 hours.	3.5.1 Action A.1	3.5.1 Action a	3
3.5.1 L.3	CTS 3.5.1, Action b, requires that a unit be in HOT STANDBY within 1 hour and HOT SHUTDOWN within the next 12 hours when an accumulator is inoperable due to a closed accumulator isolation valve. ITS LCO 3.5.1 states that if an accumulator is inoperable for any reason other than an out of limit boron concentration, the accumulator must be restored to OPERABLE status within one hour. If the accumulator is not restored to OPERABLE status within one hour, the unit must be in MODE 3 in 6 hours and MODE 3 with RCS pressure ≤ 1000 psig in 12 hours. This changes the CTS by extending the time to enter MODE 3 with a closed accumulator isolation MOV from 1 hour to 7 hours. The time to exit the Applicability remains 13 hours from the time of the inoperability, and is addressed by Discussion of Change A.6.	3.5.1	3.5.1 Action b	3

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



Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.1 L.4	CTS Surveillance 4.5.1.b requires that the accumulator boron concentration be verified at least once per 31 days and within 6 hours after each solution volume increase of $\geq 5\%$ of tank volume. ITS SR 3.5.1.4 contains the same requirements, but it will not require the boron concentration to be measured if the solution volume increase was made from the Refueling Water Storage Tank (RWST).	SR 3.5.1.4	4.5.1.b	7
3.5.1 L.5	CTS Surveillance 4.5.1.d requires verification every 18 months that each accumulator isolation MOV opens automatically when RCS pressure exceeds 2010 psig and on receipt of a safety injection test signal. The ITS does not contain that requirement.	None	4.5.1.d	5
3.5.1 L.6	CTS Surveillance 4.5.1.c requires verification that the breaker supplying power to the accumulator isolation MOV is locked in the off position at least every 31 days when the RCS pressure is above 2000 psig. ITS SR 3.5.1.5 requires verification that power is removed from each accumulator isolation MOV at least every 31 days when the RCS pressure is above 2000 psig. This changes the CTS by not specifying in what manner electrical power is removed from the valve.	SR 3.5.1.5	4.5.1.c	6
3.5.2 L.1	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a safety injection test signal. ITS SR 3.5.2.5 and SR 3.5.2.6 state that automatic actuation of ECCS components may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from "safety injection" to "actuation" is discussed in LA.6.	SR 3.5.2.5 and 3.5.2.6	4.5.2.e.1 and 4.5.2.e.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.2 L.2	CTS 3.5.2 Action a states that when one ECCS train is inoperable, it must be returned to OPERABLE status within 72 hours. ITS 3.5.2 Action A states that when one or more trains are inoperable, restore the trains to OPERABLE status within 72 hours. ITS 3.5.2, Action C states that with less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, enter LCO 3.0.3 immediately. This changes the CTS by allowing combinations of equipment from each train to be credited as meeting the ECCS safety function provided 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. For example, under the CTS an inoperable HHSI pump in one train and an inoperable low head safety injection (LHSI) pump in the other train would require a 3.0.3 entry. Under the ITS, the same condition would allow 72 hours before requiring a shutdown because the remaining OPERABLE HHSI pump and LHSI pump are capable of producing the flow equivalent to a single OPERABLE train.	3.5.2 Actions A and C	3.5.2 Action a	4
3.5.2 L.3	CTS 3.5.2 Action b requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the total accumulated actuation cycles to date. ITS 3.5.2 does not include this requirement.	None	3.5.2 Action b	8
3.5.2 L.4	CTS 4.5.2.g.1 and 4.5.2.h describe tests that must be performed following repositioning of valves, maintenance, or modification to the ECCS. The ITS does not include these testing requirements.	None	4.5.2.g.1 and 4.5.2.h	5

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

Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.2 L.5	CTS Surveillance 4.5.2.d.1 requires a visual inspection of the containment sump and verification that the subsystems suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or corrosion. ITS SR 3.5.2.8 contains the same requirements, but it is only necessary to verify that the sump components show no evidence of abnormal corrosion. This changes CTS by only requiring verification of no abnormal corrosion versus corrosion.	SR 3.5.2.8	4.5.2.d.1	6
3.5.2 L.6	CTS 4.5.2.e.1 requires verification that ECCS automatic valves actuate to their correct position. ITS SR 3.5.2.5 requires verification that ECCS automatic valves in the flow path that are not locked, sealed or otherwise secured in position, actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.5.2.5	4.5.2.e.1	6
3.5.2 L.7	CTS Surveillance 4.5.2.g requires verification that specified manual valves are locked and tagged in the proper position for injection. ITS SR 3.5.2.7 requires verification that the specified ECCS throttle valves are secured in the correct position. This changes the CTS by not specifying that the valves be verified locked and tagged.	SR 3.5.2.7	4.5.2.g	6
3.5.2 L.8	ITS 3.5.2 LCO Note states, "In MODE 3, both safety injection (SI) flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14." CTS 3.5.2 does not include such a Note. This changes the CTS by allowing both trains of ECCS to be inoperable in MODE 3 for up to 2 hours for required pressure isolation valve testing per 3.4.14.1.	LCO 3.5.2 Note	None	1

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

Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.5.3 L.1	CTS 3.5.3, Action c requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the total accumulated actuation cycles to date. ITS 3.5.3 does not include this requirement.	None	3.5.3 Action c	8
3.5.3 L.2	CTS 3.5.3 Action a allows 20 hours to reach MODE 5 when a HHSI pump or its flow path from the refueling water storage tank is inoperable. ITS 3.5.3 Action B allows 24 hours to reach MODE 5. This change the CTS by extending the Completion Time from 20 to 24 hours.	3.5.3 Action B	3.5.3 Action a	3
3.5.4 L.1	The CTS 3.5.5 Action allows 1 hour to restore an inoperable RWST. ITS LCO 3.5.4, Action A allows 8 hours to restore the RWST to OPERABLE status if the inoperability is due to the RWST boron concentration or temperature not within limits. This changes CTS by increasing the Completion Time for the specified Conditions from 1 hour to 8 hours.	3.5.4 Action A	3.5.5 Applicability 3.5.5 Action B	3
3.5.5 L.1	CTS 3.4.6.2.e is applicable in MODES 1, 2, 3 and 4. If the requirements of the LCO are not met, Action b requires entering MODE 5 (Cold Shutdown) within 30 hours. ITS 3.5.5 is applicable in MODES 1, 2, and 3. If the requirements of LCO are not met, Action B requires entering MODE 4 in 12 hours. This changes the CTS by deleting MODE 4 from the MODES of Applicability and making corresponding changes to the ACTIONS and Completion Times.	3.5.5	3.4.6.2.e	2
3.5.5 L.2	CTS Surveillance 4.4.6.2.1.c requires measurement of the RCP seal injection flow when RCS pressure is $2235 \pm 20$ psig. ITS SR 3.5.5.1 will allow 4 hours to perform the Surveillance after RCS pressure stabilizes $\geq 2215$ psig and $\leq 2255$ psig. This changes the CTS by allowing 4 hours after RCS pressure is stabilized at normal operating pressure to perform the Surveillance.	SR 3.5.5.1	4.4.6.2.1.c	7

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

Table L – Less Restrictive Changes  
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

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

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.1 L.1	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:..." 1.6.2 All equipment hatches are closed and sealed." 3.6.3 states, "Each containment isolation valve shall be OPERABLE." This changes the CTS by not including an explicit reference to sealing the equipment hatches. The change associated with moving the reference to the equipment hatch to the Bases is addressed by DOC LA.1.	3.6.3	1.6	1
3.6.2 L.1	CTS 3.6.1.3 footnote "+" allows entry to the air lock to repair the inner air lock door, if inoperable. ITS 3.6.2 contains an Action NOTE that allows entry and exit to perform repairs on the affected air lock components. This changes CTS 3.6.1.3 by stating that exiting is allowed in addition to entry, and the entry can be for repairs on any affected air lock components, not just the inner air lock door.	3.6.2 Action Note	3.6.1.3, footnote +	4
3.6.2 L.2	CTS 3.6.1.3 Action b states, "With a containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed, restore the inoperable air lock to OPERABLE status within 24 hours, or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." This is the action that would be taken in the event of an inoperable air lock interlock mechanism. ITS 3.6.2 Condition B requires that with a containment air lock interlock mechanism inoperable, an OPERABLE door is verified closed in the affected air lock within 1 hour, an OPERABLE door is closed in the affected air lock, and an OPERABLE door is verified locked closed in the affected air lock once per 31 days. Required Action NOTES indicate that these Required Actions are not applicable if both doors in the same air lock are inoperable and Condition C is entered, and entry and exit of containment is permissible under the control of a dedicated individual. This changes the CTS by allowing indefinite operation with an inoperable air lock interlock mechanism, and allows entry and exit of containment under the control of a dedicated individual.	3.6.2, Action B Notes	3.6.1.3, Action b	4

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.2 L.3	CTS 3.6.1.3 does not provide an allowance for entry or exit through an air lock except for repair to the inner air lock door, if inoperable. ITS 3.6.2 Required Action A NOTE 2 states, "Entry and exit is permissible for 7 days under administrative controls if both air locks are inoperable." This changes CTS by allowing entry and exit of containment under specified criteria for any reason.	3.6.2, Action A, Note 2	3.6.1.3	4
3.6.2 L.4	CTS 3.6.1.3 does not address how to verify locked closed air lock doors in high radiation areas. ITS 3.6.2 Required Action A.3 contains a NOTE that provides an allowance for air lock doors in high radiation areas to be verified locked closed by administrative means when a containment air lock door or containment air lock interlock mechanism is inoperable. This changes CTS by allowing an air lock door in a high radiation area to be verified closed by administrative means.	3.6.2, Action A.3 Note	3.6.1.3	4
3.6.2 L.5	Not used.	N/A	N/A	N/A
3.6.2 L.6	CTS 4.6.1.3.b, which requires testing of the containment airlock interlock once per refueling outage. For North Anna, a refueling outage testing frequency is equivalent to 18 months. ITS SR 3.6.2.2 requires testing of the containment airlock interlock every 24 months. This changes the CTS by decreasing the Frequency for the containment airlock interlock test from every 18 months to every 24 months.	SR 3.6.2.2	4.6.1.3.b	7
3.6.3 L.1	CTS 4.6.3.1.1.b describes tests that must be performed prior to returning a valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements.	None	4.6.3.1.1.b	5

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.2	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...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by one of the specified methods within 4 hours. This changes CTS by increasing the time within which to take the Required Action from 1 hour to 4 hours.	3.6.3, Action A.1	3.6.5.1 Action	3
3.6.3 L.3	CTS 3.6.3.1 states, “With one or more of the (containment) isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and: isolate each affected penetration within 4 hours” by one of the means specified. ITS 3.6.3 Condition C includes a Note stating that Condition C only applies to penetration flow paths with only one containment isolation valve and a closed system. Action C.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the penetration flow path be isolated by one of the means specified within 72 hours. This changes the CTS by extending the Completion Time from 4 hours to 72 hours when the inoperable valve is used in conjunction with a closed system.	3.6.3, Condition C	3.6.3.1	3
3.6.3 L.4	CTS 3.6.5.1 Action states, “With the inside or outside isolation valve in the steam jet air ejector suction line not closed, restore the valve to the closed position...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. This changes CTS by only requiring the flow path be isolated by one of the specified methods, rather than requiring both valves be closed.	3.6.3, Action A.1	3.6.5.1, Action	4

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



Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.5	CTS 4.6.1.1.a, 4.6.5.1.1, and 4.6.5.1.2 require verification that specified containment penetrations are closed. ITS SR 3.6.3.1 and ITS SR 3.6.3.2 include similar requirements, but contain a Note that allows valves and blind flanges in high radiation areas to be verified administratively. This changes the CTS by allowing certain valves and blind flanges to not require physical verification.	SR 3.6.3.1 Note, SR 3.6.3.2 Note	4.6.1.1.a, 4.6.5.1.1, 4.6.5.1.2	6
3.6.3 L.6	CTS 4.6.1.1 states, "Primary CONTAINMENT INTEGRITY shall be demonstrated: a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions except for valves that are open under administrative control as permitted by Specification 3.6.3.1." The "*" footnote states, "Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days." CTS 4.6.5.1.2 states, "The steam jet air ejector suction line inside isolation valve shall be determined to be in the closed position prior to increasing the Reactor Coolant System temperature above 200°F." ITS SR 3.6.3.1 states, "Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls," every 31 days. SR 3.6.3.2 has similar controls for valves inside containment, but a different Frequency. This changes the CTS by not requiring valves locked, sealed or otherwise secured be verified closed as part of the Technical Specification Surveillance Requirements.	SR 3.6.3.1, SR 3.6.3.2	4.6.1.1, footnote *, 4.6.5.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.7	CTS 4.6.1.1 states, "Primary CONTAINMENT INTEGRITY shall be demonstrated: a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions except for valves that are open under administrative control as permitted by Specification 3.6.3.1." The "*" footnote states, "Except valves, blind flanges, and deactivate automatic valves which are located inside the containment and are locked sealed or otherwise sealed in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such surveillance need not be performed more often than once per 92 days." ITS SR 3.6.3.2 states, "Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls." The Frequency is prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. This changes the CTS for the valves inside containment by only requiring valves not locked, sealed or otherwise secured to be verified closed prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days, instead of every 31 days. Changes associated with not requiring verification of closure of valves which are locked, sealed, or otherwise secured, are addressed in DOC L.6.	SR 3.6.3.2	4.6.1.1 footnote *	7

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.8	CTS 4.6.5.1.2 states, “The steam jet air ejector suction line inside isolation valve shall be determined to be in the closed position prior to increasing the Reactor Coolant System temperature above 200°F.” ITS SR 3.6.3.2 states, “Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.” The Frequency is prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. This changes the CTS by adding the criteria to the Frequency that the verification may be performed up to 92 days prior to entering MODE 4 from MODE 5. Changes associated with valves which are locked, sealed, or otherwise secured are addressed by DOC L.6.	SR 3.6.3.2	4.6.5.1.2	7
3.6.3 L.9	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 the CTS by allowing any penetration, except for the exceptions noted, to be unisolated on an intermittent basis under administrative control, and not just locked or sealed closed valves. Changes associated with the exceptions to this allowance listed are addressed by DOC M.2.	3.6.3, Action Note 1	3.6.3.1	1

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.10	CTS 3.6.3.1 Action states, “With one or more of the isolation valves inoperable...b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange...” ITS 3.6.3 Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected isolation flow path be isolated by use of at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. This changes CTS by allowing penetration flow paths with two containment isolation valves that have one containment isolation valve inoperable, to use a check valve with flow through the valve secured as the means of isolating the penetration flow path.	3.6.3, Action A.1	3.6.3.1 Action	4
3.6.3 L.11	CTS 4.6.3.1.2 states, “Each containment isolation valve shall be demonstrated OPERABLE...by: a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position. b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.” ITS SR 3.6.3.4 states, “Verify each automatic power operated containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.” This changes the CTS by not requiring valves locked, sealed or otherwise secured in position be tested to automatically actuate to their isolation position. Changes associated with moving details to the Bases are addressed by DOC LA.3. Changes associated with allowing the use of an actual signal for conducting the Surveillance Requirement are addressed by DOC L.12.	SR 3.6.3.4	4.6.3.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.12	CTS 4.6.3.1.2 states, “Each containment isolation valve shall be demonstrated OPERABLE...by: a. Verifying that on a Phase A containment isolation test signal, each Phase A isolation valve actuates to its isolation position. b. Verifying that on a Phase B containment isolation test signal, each Phase B isolation valve actuates to its isolation position.” ITS SR 3.6.3.4 states, “Verify each automatic power operated containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.” This changes the CTS by not requiring valves locked, sealed or otherwise secured in position be tested to automatically actuate to their isolation position. Changes associated with moving details to the Bases are addressed by DOC LA.3. Changes associated with not requiring the Surveillance Requirement be conducted on valves locked, sealed, or otherwise secured in position are addressed by DOC L.11.	SR 3.6.3.4	4.6.3.1.2	6
3.6.3 L.13	CTS 4.6.3.1.3 states, “The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested...” ITS SR 3.6.3.3 states, “Verify the isolation time of each automatic power operated containment isolation valve is within limits.” This changes the CTS by deleting the reference to power operated containment isolation valves that may not be automatic.	SR 3.6.3.3	4.6.3.1.3	6
3.6.3 L.14	Not used.	N/A	N/A	N/A
3.6.3 L.15	CTS 3.6.3.1 states that with one or more isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration and restore the inoperable valve to OPERABLE status within 4 hours. ITS 3.6.3, ACTION D, states that with purge valve leakage not within limit, restore leakage within limit within 24 hours. This changes the CTS by relaxing the Completion Time for one or more inoperable purge valves from 4 hours to 24 hours.	3.6.3 Action D	3.6.3.1	3

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.3 L.16	CTS 4.6.1.1.a requires verification that all non-automatic containment isolation valves that are required to be closed are closed every 31 days. If a non-automatic valve that is supposed to be closed is found open, CTS 3.6.1.1 Action applies. That Action states, "Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours." ITS 3.6.3 ACTIONS do not differentiate between automatic and non-automatic valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected flow path. ITS 3.6.3 allows continued operation with the inoperable containment isolation valve, but if the Required Actions and associated Completion Times are not met, a shutdown to MODE 3 in 6 hours and MODE 5 in 36 hours is required. In addition, ITS 3.6.3 ACTIONS Notes 2, 3 and 4 allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for systems made inoperable by containment isolation valves, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage for a penetration flow path results in exceeding the overall containment leakage rate acceptance criteria. This changes the CTS by providing 1 hour, 4 hours or 72 hours to isolate a penetration flow path affected by an inoperable non-automatic containment isolation valve, and allowing continued operation with an inoperable non-automatic containment isolation valve. This also changes the CTS by allowing separate condition entry for each penetration flow path with an inoperable non-automatic containment isolation valve, requiring entry into the applicable Conditions and Required Actions for systems made inoperable by inoperable non-automatic containment isolation valves, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage through a penetration flow path due to an inoperable non-automatic containment isolation valve results in exceeding the overall containment leakage rate acceptance criteria.	3.6.3 ACTIONS	4.6.1.1.a	4

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change		ITS Requirement	CTS Requirement	Change Type
3.6.4    None	N/A		N/A	N/A	N/A
3.6.5    None	N/A		N/A	N/A	N/A
3.6.6    L.1	CTS Surveillance 4.6.2.1.c.1 requires verification that each automatic valve in the flow path actuates to its correct position on a containment - high-high pressure signal. ITS SR 3.6.6.3 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the containment - high-high pressure signal reference and addition of the actual or simulated actuation signal reference are addressed by Removed Detail and Less Restrictive changes respectively.		SR 3.6.6.3	4.6.2.1.c.1	6
3.6.6    L.2	CTS Surveillances 4.6.2.1.c.1 and 4.6.2.1.c.2 require verification of the automatic actuation of QS components on a containment high-high pressure signal. ITS SR 3.6.6.3 and SR 3.6.6.4 specify that the testing may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.3.		SR 3.6.6.3, SR 3.6.6.4	4.6.2.1.c.1, 4.6.2.1.c.2	6
3.6.7    L.1	CTS 3.6.2.2 ACTION b states that with two containment RS subsystems inoperable in one RS train, restore one inoperable subsystem to OPERABLE status within 72 hours. ITS 3.6.7 Condition C addresses two inside RS subsystems inoperable, allowing a COMPLETION TIME of 72 hours. This changes the CTS by allowing 72 to hours to restore one RS subsystem to OPERABLE status when two inside RS subsystems are inoperable instead of entering LCO 3.0.3.		3.6.7, Condition C	3.6.2.2 Action b	4

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.7 L.2	CTS 3.6.2.2, ACTION b states that with two RS subsystems inoperable in one RS train, one inoperable subsystem must be restored to OPERABLE status within 72 hours, or the unit be placed in HOT STANDBY within the next 6 hours, and COLD SHUTDOWN within the next 30 hours. CTS 3.6.2.2, ACTION c states that with the casing cooling tank inoperable, the tank must be restored to OPERABLE status within 72 hours, or the unit be placed in HOT STANDBY within the next 6 hours, and COLD SHUTDOWN within the next 30 hours. ITS 3.6.7 REQUIRED ACTION E.2 states that 84 hours is allowed to place the unit in MODE 5. This changes CTS by allowing 48 more hours to place the unit in MODE 5 when the Required Actions and associated Completion Times are not met.	3.6.7, Action E.2	3.6.2.2, Action b, Action c	3
3.6.7 L.3	CTS 4.6.2.2.1.c.1 and 4.6.2.2.1.c.2 require verification of the automatic actuation of RS components on a containment high-high pressure signal. ITS SR 3.6.7.6 states that automatic actuation of RS components may be performed with an actual or simulated actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.4.	SR 3.6.7.6	4.6.2.2.1.c.1, 4.6.2.2.1.c.2	6
3.6.7 L.4	CTS 4.6.2.2.1.c.2 requires verification that each automatic valve in the RS flow path actuates to its correct position on an actuation signal. ITS SR 3.6.7.6.a requires verification that each RS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to its correct position on an actuation signal. This changes the CTS by specifying that the verification applies only to automatic RS valves that are not locked, sealed, or otherwise secured in position.	SR 3.6.7.6	4.6.2.2.1.c.2	6

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



Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.8 L.1	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of Chemical Addition System automatic valves on a containment high-high test signal. ITS SR 3.6.8.4 specifies that the testing may be performed with an actual or simulated (i.e., test) actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from “containment high-high signal” to “actuation signal” is discussed in LA.3.	SR 3.6.8.4	4.6.2.3.c	6
3.6.8 L.2	CTS Surveillance 4.6.2.3.c requires verification that each automatic valve in the flow path actuates to its correct position on a containment high-high test signal. ITS SR 3.6.8.4 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the containment - high-high pressure signal reference and addition of the actual or simulated actuation signal reference are addressed by Removed Detail and Less Restrictive changes respectively.	SR 3.6.8.4	4.6.2.3.c	6
3.6.9 L.1	CTS 4.6.4.2.E requires performing a CHANNEL CALIBRATION of all instrumentation and control circuits on each hydrogen recombiner once per 18 months. ITS does not include this requirement. This changes the CTS by deleting a Surveillance Requirement.	None	4.6.4.2.E	5

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

Table L – Less Restrictive Changes  
ITS Section 3.6 - Containment Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.6.9 L.2	CTS 3.6.4.2 states, "With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours." ITS 3.6.9 Condition A requires one inoperable hydrogen recombiner be restored to OPERABLE status within 30 days. ITS 3.6.9 Condition B requires that with two hydrogen recombiners inoperable, "Verify by administrative means that the hydrogen control function is maintained," within one hour and once per 12 hours thereafter, and, "Restore one hydrogen recombiner to OPERABLE status," within 7 days. This changes the CTS by allowing both hydrogen recombiners to be inoperable for 7 days if the Required Actions are met, instead of entering CTS LCO 3.0.3.	3.6.9, Conditions A and B	3.6.4.2	3

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

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.1 L.1	CTS 3.7.1.1, Action a, provides for one or more main steam safety valves (MSSVs) to be inoperable with the unit operating in MODES 1, 2, and 3. The ACTION requires that within 4 hours the MSSV(s) be restored to OPERABLE status, or the Power Range Neutron Flux High Setpoint Trip(s) to be reduced in accordance with the requirements of Table 3.7-1. ITS 3.7.1, ACTIONS Note, states "Separate Condition entry is allowed for each MSSV." This changes the CTS by allowing separate condition entry for each inoperable MSSV.	3.7.1 Actions Note	3.7.1.1 Action a	Note 1
3.7.1 L.2	CTS 3.7.1.1 states that with one or more MSSVs inoperable, reduce the Power Range Neutron Flux - High trip setpoint within 4 hours. ITS 3.7.1, Action A, states that with one or more steam generators with one MSSV inoperable and the Moderator Temperature Coefficient (MTC) zero or negative at all power levels, reduce THERMAL POWER to ≤ 52% RTP within 4 hours. ITS 3.7.1, Action B, states that with one or more steam generators with one MSSV inoperable and the MTC positive at any power levels or one or more steam generators with two or more MSSVs inoperable, reduce THERMAL POWER to ≤ the % RTP listed in Table 3.7.1-1 and reduce the Power Range Neutron Flux - High reactor trip setpoint to less than the limit in Table 3.7.1-1. This changes the CTS by not requiring the Power Range Neutron Flux - High trip setpoint be reduced when only one MSSV per steam generators is inoperable and the MTC is zero or negative at all power levels.	None	3.7.1.1	4

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.1 L.3	CTS 3.7.1.1 states that with one or more MSSVs inoperable, reduce the Power Range Neutron Flux - High trip setpoint within 4 hours. ITS 3.7.1, Action B, also requires the Power Range Neutron Flux - High trip setpoint to be reduced, but is modified by at Note stating that this action is only required in MODE 1. This changes the CTS by only requiring the Power Range Neutron Flux - High trip setpoint be reduced when in MODE 1.	3.7.1 Action B	3.7.1.1	4
3.7.1 L.4	Not used.	N/A	N/A	N/A
3.7.1 L.5	CTS LCO 3.7.1.1 Table 3.7-2 lists the orifice size for the main steam safety valves. ITS 3.7.1 does not contain this information. This changes the CTS by eliminating the diameter of the MSSVs from the Technical Specifications.	None	Table 3.7-2	1
3.7.2 L.1	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all MSTVs are closed and deactivated. This changes the CTS by making the specification not applicable in MODES 2 and 3 when all MSTVs are closed and deactivated.	3.7.2 Applicability	3.7.1.5	2

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.2 L.2	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 Hot Shutdown (MODE 3) within the next 12 hours. ITS Action A allows 8 hours to restore an inoperable MSTV to OPERABLE status when in MODE 1, and an additional 6 hours to be in MODE 2. This changes the CTS Completion Time to restore an inoperable MSTV from 4 hours to 8 hours, and the required MODE from MODE 3 to MODE 2. The change in the time to enter MODE 3 from 16 hours to 14 hours is discussed in DOC M.5.	3.7.2 Action A	3.7.1.5 Actions	3
3.7.2 L.3	CTS 3.7.1.5 Actions allow only one MSTV to be inoperable in MODES 2 and 3. If more than one MSTV is inoperable; LCO 3.0.3 entry is required. ITS 3.7.2 Action C allows one or more main steam trip valves to be inoperable in MODES 2 and 3, and contains a Note which states, "Separate Condition entry is allowed for each MSTV." This changes the CTS by allowing more than one MSTV to be inoperable in MODES 2 and 3.	3.7.2 Action C Note	3.7.1.5 Actions	4
3.7.2 L.4	LCO 3.7.1.5 requires that the valves to be OPERABLE in MODES 1, 2, and 3. CTS 4.0.4 requires MSTVs to be tested prior to entry into the MODES of Applicability. ITS SR 3.7.2.1 contains a NOTE which allows entry into MODE 3 for the purpose of performing the required testing. This changes the CTS by allowing the plant to enter MODE 3 prior to the performance of the required testing.	SR 3.7.2.1 Note	3.7.1.5	7
3.7.3 None	N/A	N/A	N/A	N/A

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.4 None	N/A	N/A	N/A	N/A
3.7.5 L.1	CTS 4.7.1.2.c.1 and 4.7.1.2.c.2 require verification that each automatic valve actuates to its correct position and each AFW pump starts automatically upon receipt of an AFW actuation test signal. ITS SRs 3.7.5.3 and 3.7.5.4 will contain the same requirements, except the ITS requirements will permit the use of an actual or simulated test signal to initiate the component actuation.	SRs 3.7.5.3 and 3.7.5.4	4.7.1.2.c.1 and 4.7.1.2.c.2	4
3.7.5 L.2	CTS SR 4.7.1.2.b.1 provides for the surveillance testing of the AFW pumps. The requirement provides an exception to Specification 4.0.4 for the testing of the AFW steam turbine driven pump. Surveillance requirement 4.7.1.2.c.2 states at least once per 18 months verify each AFW pump will start automatically upon receipt of an auxiliary feedwater actuation test signal. A Note is added to ITS SRs 3.7.5.2 and 3.7.5.4 that allows a delay in the performance of required testing for the turbine driven AFW pump until the required steam pressure of 1005 psig is reached. This changes the CTS by providing an allowance for delaying the performance of required testing without requiring the turbine driven AFW pump to be declared inoperable.	SRs 3.7.5.3 and 3.7.5.4 Notes	4.7.1.2.b.1	6

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.3	CTS 3.7.1.2 Action a. requires all AFW pumps to be restored to an OPERABLE status within 72 hours for any condition of inoperability. ITS 3.7.5 ACTION A permits 7 days to restore the steam supply valve to an OPERABLE status when the steam turbine driven AFW pump is inoperable due to an inoperable steam supply valve or if one turbine driven AFW pump is inoperable following refueling when MODE 2 has not been entered.. This changes the CTS by extending the ACTION time from 72 hours to 7 days for the steam-driven pump in these conditions.	3.7.5 Action A	3.7.1.2 Action a	4
3.7.5 L.4	CTS SR 4.7.1.2.b requires the testing of the AFW pumps on a 92 day staggered test basis (STB). ITS SR 3.7.5.2 requires the AFW pumps tested in accordance with the Inservice Testing (IST) program. This changes the CTS requirements by allowing the testing of the AFW pumps on a three month basis and not specifically on a 92 day STB.	SR 3.7.5.2	4.7.1.2.b	7
3.7.5 L.5	CTS SR 4.7.1.2.d requires that the AFW system flow paths shall be demonstrated Operable prior to entry into MODE 3 following each COLD SHUTDOWN. This requires the flow testing of the AFW train from the ECST to the associated Steam Generator (SG). ITS SR 3.7.5.5 requires the flow path verification only when the unit has been in MODES 5, 6, or defueled for outages that last for a cumulative period of greater than 30 days. This change to the CTS eliminates performance of the SR for outages of less than 30 days.	SR 3.7.5.5	4.7.1.2.d	7

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.6	CTS 3.7.1.2 ACTION c. states with three AFW pumps inoperable, immediately initiate corrective action to restore at least one AFW pump to OPERABLE status as soon as possible. This ACTION does not require the plant to be shutdown or provide an exception to Specification 3.0.3. ITS ACTION D requires with three inoperable AFW trains in MODES 1, 2, or 3 initiate action to restore one AFW trains to OPERABLE status immediately. This also adds a Note which state that LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is OPERABLE. This changes the CTS requirements for the AFW system to not require a plant shutdown when all AFW trains are inoperable.	3.7.5 Action D	3.7.1.2 Action c	4
3.7.5 L.7	CTS Surveillance Requirement 4.7.1.2.c.1 requires the verification of the actuation for each AFW automatic valve in the flow path to its correct position. This is applicable for each valve on an AFW actuation test signal at least once per 18 months when the plant is shutdown. ITS SR 3.7.5.3 requires verifying that each AFW automatic valve not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal once every 18 months. This changes the CTS by only requiring the testing of AFW valves that are not locked, sealed or otherwise secured in position.	SR 3.7.5.3	4.7.1.2.c.1	6

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.5 L.8	CTS 3.7.1.2 ACTION a. states, “With one AFW pump inoperable, restore the required AFW pumps to OPERABLE status within 72 hours.” ITS 3.7.5 ACTION A states, “One steam supply to turbine driven pump inoperable, or one turbine driven AFW pump inoperable following refueling, restore the affected equipment to OPERABLE status within 7 days.” ACTION B requires, “One AFW train inoperable in MODE 1, 2, or 3 for any reason other than Condition A, restore AFW train to OPERABLE status within 72 hours.” ACTIONS A and B have a modified Completion Time that states, “10 days from the discovery of failure to meet the LCO.” This changes the CTS by allowing up to 10 days to have a combination of inoperable AFW trains.	3.7.5 Actions A and B	3.7.1.2 Action a	3
3.7.5 L.9	CTS 3.7.1.2 ACTION b. states that with two AFW pumps inoperable, be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. ITS Action C states, in part, that with two AFW trains inoperable, be in MODE 3 in 6 hours and MODE 4 in 18 hours. This changes the CTS by allowing 18 hours instead of 12 hours to be in MODE 4.	3.7.5 Action C	3.7.1.2 Action b	3
3.7.5 L.10	CTS 3.7.1.2 ACTION a. states that with one AFW pump inoperable, restore the pump to OPERABLE status within 72 hours or be in HOT SHUTDOWN (i.e., MODE 4) within 6 hours. ITS ACTION C states that if an inoperable AFW train is not restored, be in MODE 3 in 6 hours and MODE 4 in 18 hours. This changes the CTS by allowing 6 hours to be in MODE 3 instead of MODE 4 and allowing 18 hours to be in MODE 4.	3.7.5 ACTION C	3.7.1.2 ACTION a	3

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.6 L.1	CTS 3.7.1.2, Action b. states that if an inoperable ECST is not restored to OPERABLE status within 7 days, the plant must be in HOT SHUTDOWN within 24 hours. ITS 3.7.6, Action B, states that if an inoperable ECST is not restored to OPERABLE status within 7 days, the plant must be in MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal within 24 hours. This changes the time to be in MODE 4 without reliance on the steam generators for heat removal from 12 hours to 24 hours. The addition of the MODE 3 Completion Time is discussed in DOC M.2. The addition of the condition to be in MODE 4 without reliance on the steam generators for heat removal is discussed in DOC M.1.	3.7.6 Action B	3.7.1.2 Action b	3
3.7.7 L.1	CTS Table 4.7-1 item #1 requires that the gross activity determination be completed at least once per 72 hours. ITS 3.7.7 does not require any sampling to be performed to determine the gross activity of the secondary coolant. This changes the CTS by deleting the requirement for gross activity determination once per 72 hours.	None	Table 4.7-1, Item 1	5
3.7.8 L.1	CTS 4.7.4.1.c.1 and 4.7.4.1.c.2 require verification that SW System automatic valves actuate to their correct position. ITS SR 3.7.8.2 requires verification that SW System automatic valves in the flow path that are not locked, sealed or otherwise secured in position, actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by exempting valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.8.2	4.7.4.1.c.1 and 4.7.4.1.c.2	

Change Category:

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.8 L.2	Not used.	N/A	N/A	N/A
3.7.9 None	N/A	N/A	N/A	N/A
3.7.10 L.1	CTS 4.7.7.1 states, “Each control room emergency ventilation system shall be demonstrated OPERABLE: a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 hours with the heaters on.” ITS SR 3.7.10.1 states, “Operate each required MCR/ESGR EVS train for ≥ 10 continuous hours with the heaters operating.” The Frequency is every 31 days. This changes the CTS by removing the STAGGERED TEST BASIS requirement from the 31 day Frequency. The change moving details of the test to the Bases is addressed in a removed detail discussion of change.	SR 3.7.10.1	4.7.7.1	7
3.7.10 L.2	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 the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in a removed detail discussion of change.	SR 3.7.10.3	4.7.7.1.d.2	6

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.10 L.3	CTS 4.7.7.1.d.2 states, "Each control room emergency ventilation system shall be demonstrated OPERABLE:...At least once per 18 months by:...verifying that the system maintains the control room at a positive pressure of $\geq 0.04$ inch W.G. relative to the outside atmosphere at a system flow rate of 1000 cfm $\pm 10\%$ ." ITS SR 3.7.10.4 requires the same surveillance be performed every 18 months on a STAGGERED TEST BASIS. This changes the CTS by requiring the surveillance be performed every 18 months on a STAGGERED TEST BASIS instead of every 18 months. The change in the positive pressure required is addressed by DOC M.5.	SR 3.7.10.4	4.7.7.1.d.2	7

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.10 L.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...” 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 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. ITS 3.7.13, “MCR/ESGR Bottled Air System,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.10 Action A	3.7.7.1 Actions a and b	3
3.7.10 L.5	The ITS LCO 3.7.10 Note states, "The MCR/ESGR boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.7.7.1. This changes CTS by explicitly allowing the MCR/ESGR boundary to be opened intermittently under administrative control.	3.7.10 LCO Note	None	!

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.11 L.1	CTS 3.7.7.1 Action c allows 7 days to restore an inoperable air conditioning subsystem to OPERABLE status. ITS 3.7.11 allows 30 days to restore an inoperable air conditioning subsystem to OPERABLE status. This changes the CTS by increasing the time allowed to restore the inoperable components from 7 days to 30 days.	3.7.11	3.7.7.1 Action c	3
3.7.12 L.1	CTS 4.7.8.1 states, “Each ECCS PREACS train shall be demonstrated OPERABLE: a. At least once per 31 days on a STAGGERED TEST BASIS by: 1. Initiating, from the control room, Safeguards Area exhaust flow and Auxiliary Building Central exhaust flow through the auxiliary building HEPA filter and charcoal adsorber assembly and verifying that the ECCS PREACS train operates for at least 10 hours with the heater on.” ITS SR 3.7.12.1 states, “Operate each ECCS PREACS train for ≥ 10 continuous hours with the heaters operating.” The Frequency is every 31 days. This changes the CTS by removing the STAGGERED TEST BASIS requirement from the 31 day frequency. The change moving details of the test to the Bases is addressed in a removed detail discussion of change.	SR 3.7.12.1	4.7.8.1.a.1	3

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.12 L.2	CTS 4.7.8.1.d.2 requires demonstrating the SAVS OPERABLE every 18 months by, “Verifying that on a Containment Hi-Hi Test Signal, the system automatically diverts Safeguards Area exhaust flow...” ITS SR 3.7.12.4 states, “Verify Safeguards Area exhaust flow is diverted and each Auxiliary Building filter bank is actuated on an actual or simulated actuation signal.” The frequency is every 18 months. This changes the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in DOC LA.3.	SR 3.7.12.4	4.7.8.1.d.2	6

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.13 L.1	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 or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 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 3.7.10, “MCR/ESGR EVS-MODES 1, 2, 3, and 4,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.13 Action A	3.7.7.1 Actions a and b	3

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

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Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.13 L.2	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 3.7.13.3 states, “Verify each MCR/ESGR bottled air system train actuates on an actual or simulated actuation signal.” The Frequency is every 18 months. This changes the CTS by allowing the automatic actuation to be verified by either an actual or simulated actuation signal. The change moving the detail of what is verified by the surveillance and how it is performed to the Bases is addressed in a removed detail discussion of change.	SR 3.7.13.3	4.7.7.1.d.2	6
3.7.13 L.3	CTS 4.7.7.2.b states, “Each bottled air pressurization system shall be demonstrated OPERABLE :…At least once per 18 months by verifying that the system will supply at least 340 cfm of air to maintain the control room at a positive pressure of ≥ 0.05 inch W.G. relative to the outside atmosphere for at least 60 minutes.” ITS SR 3.7.13.4 requires the same surveillance be performed every 18 months on a STAGGERED TEST BASIS. This changes the CTS by requiring the surveillance be performed every 18 months on a STAGGERED TEST BASIS instead of every 18 months.	SR 3.7.13.4	4.7.7.2.b	7

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

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ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.13 L.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...” 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 3.7.13 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 3.7.10, “MCR/ESGR EVS-MODES 1, 2, 3, and 4,” has a similar Required Action A.1. This changes the CTS by allowing portions of both the MCR/ESGR bottled air system and the MCR/ESGR EVS to be inoperable for 7 days rather than 24 hours. Changes associated with identifying system train inoperabilities rather than whole systems are addressed by DOC M.2. Changes associated with not allowing both systems to be inoperable for 24 hours are addressed by DOC M.3. Changes associated with the MCR/ESGR bottled air system are addressed in ITS 3.7.13.	3.7.13 Action A	3.7.7.1 Actions a and b	3
3.7.13 L.5	The ITS LCO 3.7.13 Note states, "The MCR/ESGR boundary may be opened intermittently under administrative control." This allowance is not explicitly stated in CTS 3.7.7.1. This changes CTS by explicitly allowing the MCR/ESGR boundary to be opened intermittently under administrative control.	3.7.13 LCO Note	None	1
3.7.14 None	N/A	N/A	N/A	N/A

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.15 L.1	CTS 3.9.12 Applicability includes, "During irradiated fuel movement within the spent fuel pit." ITS 3.7.15 Applicability is, "During movement of recently irradiated fuel assemblies in the fuel building." All references in CTS 3.9.12 to irradiated fuel are changed to "recently" irradiated fuel. This changes the CTS by eliminating requirements for the FBVS during movement of fuel that is not recently irradiated.	3.7.15 Applicability	3.9.12 Applicability	2
3.7.15 L.2	CTS 4.9.12 states, "The above required fuel building ventilation system shall be demonstrated OPERABLE and discharging through at least one auxiliary building HEPA filter and charcoal adsorber assembly: a. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber assembly for 15 minutes...c. By performance of the Surveillance Requirements of Specification 4.7.8.1 b, c, d, e, and f." CTS LCO 3.9.12 and CTS Action a refer to the HEPA filter and charcoal adsorber assembly of the FBVS. ITS 3.7.15 does not include these requirements. This changes CTS by deleting the testing requirements for the fuel building filtration systems.	None	4.9.12.a and 4.9.12.c	5
3.7.15 L.3	CTS 3.9.12 Applicability includes, "b. During crane operation with loads over irradiated fuel in the spent fuel pit." CTS 3.9.12 Actions "a" and "b" address actions to take during "crane operation with loads over the spent fuel pit." ITS 3.7.15 does not include these requirements. This changes CTS by not requiring requirements be met for a portion of the current applicability.	None	3.9.12 Applicability b, 3.9.12 Actions a and b	2

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.16 L.1	CTS 3.9.11 states that the requirements on spent fuel pit water level are applicable, “Whenever irradiated fuel assemblies are in the spent fuel pit.” CTS 4.9.11 requires the water level in the spent fuel pit to be verified every 7 days when irradiated fuel assemblies are in the spent fuel pit. ITS 3.7.16 is applicable, “During movement of irradiated fuel assemblies in the fuel storage pool.” ITS SR 3.7.16.1 requires verification of the spent fuel pool water level every 7 days. This changes the CTS by restricting the applicability of the spent fuel pool water level specification and performance of the Surveillance to during the movement of irradiated fuel assemblies in the fuel storage pool.	3.7.16 Applicability and SR 3.7.16.1	3.9.11 and 4.9.11	2
3.7.16 L.2	CTS 3.9.11 ACTION states that when the spent fuel pool water level is not met, suspend all movement of fuel assemblies and crane operations with loads in the spent fuel pit areas and place the load in a safe condition, and restore the water level to within its limit within 4 hours. The CTS also states that Specification 3.0.3 is not applicable. ITS 3.7.16 REQUIRED ACTION A.1 states that when fuel storage pool water level is not within limit, immediately suspend movement of irradiated fuel assemblies in the fuel storage pool. A NOTE to REQUIRED ACTION A.1 states that LCO 3.0.3 is not applicable. This changes the CTS requiring the suspension of movement of only irradiated fuel, by eliminating actions related to crane operation over the spent fuel pool and eliminating the requirement to restore the water level within 4 hours.	3.7.16 Action A and Action A Note	3.9.11 Action	4
3.7.17 None	N/A	N/A	N/A	N/A

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.7 – Plant Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.7.18 None	N/A	N/A	N/A	N/A
3.7.19 L.1	CTS 4.7.3.1.b requires each component cooling water pump to be tested in accordance with Specification 4.0.5. ITS 3.7.19 does not contain this Surveillance. This changes the CTS by deleting a Surveillance Requirement.	None	4.7.3.1.b	5

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

Note 1 - Certain Less Restrictive changes for Section 3.7 did not fall into the categories used for the other Section. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.7.

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.1	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. If the redundant feature is not OPERABLE, a shutdown to a MODE in which the feature is not required must be started within one hour. ITS 3.8.1 Required Action A.2 requires the declaration of required feature(s), with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the new action is 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 24 hours before declaring a required feature inoperable, when an offsite source and a redundant required feature are inoperable.	3.8.1, Required Action A.2	3.0.5	3
3.8.1 L.2	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. If the redundant feature is not OPERABLE, a shutdown to a MODE in which the feature is not required must be started within one hour. ITS Required Action B.2 requires the declaration of required feature(s), with no EDG available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the new action is 4 hours from discovery of inoperable EDG on one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 4 hours before declaring a required feature inoperable, with ar. EDG and a redundant required feature inoperable.	3.8.1, Required Action B.2	3.0.5	3

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.3	CTS 3.8.1.1 Action b requires that within the next twenty-four hours of one EDG becoming inoperable, the other train's OPERABLE EDG must be started and fully loaded for one hour in accordance with CTS SR 4.8.1.1.2.a.4. This is required regardless of whether or not the inoperable EDG is restored to OPERABLE status. This is not required to be performed if the absence of any potential for common mode failure can be demonstrated for the OPERABLE EDG. ITS Action B.3 requires a determination that the OPERABLE EDG is not inoperable due to a common cause failure. This evaluation is required to be completed within twenty-four hours or the performance of ITS SR 3.8.1.2 is required. This Surveillance only requires the start of the OPERABLE EDG. This changes the CTS requirements by not requiring the OPERABLE EDG to be run at full load for one hour and eliminates the requirement that the test for the OPERABLE EDG be completed regardless of whether the inoperable EDG is restored to OPERABLE status.	3.8.1, Required Action B.3	3.8.1.1, Action b	4
3.8.1 L.4	CTS LCO 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. LCO 3.0.5 requires a unit shutdown to start within one hour with two offsite circuits inoperable. ITS 3.8.1 Required Action G.1 requires the declaration of required feature(s) with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the Required Action G.1 is 12 hours from discovery of no offsite power concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing 12 hours before declaring a required feature inoperable.	3.8.1, Required Action B.1	3.0.5	3

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.5	CTS surveillance requirement 4.8.1.1.2.a requires that each EDG be demonstrated OPERABLE in accordance with the frequency specified in Table 4.8-2 on a STAGGERED TEST BASIS (STB). CTS Table 4.8-2 specifies the test frequency based on the number of failures that have occurred in testing each EDG during the previous 20 or 100 tests. If the number of failures do not exceed the specified limit, testing is to be performed every 31 days. If failures occur above the specified limits, then testing is conducted every 7 days. ITS SR 3.8.1.2 states that each EDG be started and reach steady state voltage and frequency within a fixed Frequency of 31 days. This changes the CTS by eliminating the requirements to test on a staggered test basis and an increasing frequency of testing based on the number of test failures.	SR 3.8.1.2	4.8.1.1.2.a, Table 4.8-2	7
3.8.1 L.6	CTS requirements 4.8.1.1.2.d.3, 4, and 5 state that an EDG will respond to a loss of offsite power, an ESF actuation, and a loss of offsite power in conjunction with ESF actuation. These requirements do not specifically state that an actual or simulated signal may be used for the requirements. ITS SRs 3.8.1.10, 3.8.1.11, 3.8.1.12, and 3.8.1.17 state the EDG may be started for these requirements with an actual or simulated signal. This changes the CTS to allow either an actual or simulated signal to be credited in the performance of these requirements.	SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, and SR 3.8.1.17	4.8.1.1.2.d.3, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5	6
3.8.1 L.7	Unit 2 CTS requirement 4.8.1.1.1.b requires the demonstration of OPERABILITY for the alternate offsite circuit by the manual transferring of the onsite Class 1E power source from the normal circuit to the alternate circuit every 18 months with the plant shutdown. The ITS does not include this requirement for Unit 2. This change eliminates a CTS Surveillance.	None	Unit 2 4.8.1.1.1.b	5

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



Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.8	CTS Surveillance 4.8.1.1.2.e describes the testing that must be performed following any modification that could affect EDG interdependence. ITS 3.8.1 does not include these testing requirements.	None	4.8.1.1.2.e	5
3.8.1 L.9	CTS Surveillance Requirements 4.8.1.1.1 and 4.8.1.1.2 contain the requirements to perform various testing “during shutdown.” Surveillance Requirement for 4.8.1.1.2.d is required to be performed during shutdown. ITS SR 3.8.1.11 states in a Note that the required Surveillance shall not be performed in MODE 1 or 2. This changes the CTS requirements for testing of the AC sources by allowing the listed test to be performed in MODES 3 or 4.	SR 3.8.1.11 Note	4.8.1.1.1 and 4.8.1.1.2	6
3.8.1 L.10	CTS Surveillance Requirements 4.8.1.1.1 and 4.8.1.1.2 contain requirements to perform various testing “during shutdown.” ITS SRs 3.8.1.8, 3.8.1.12, and 3.8.1.13 add a Note that restricts performance of the SRs in MODES 1 and 2. The Note is modified with an allowance that the SR may be performed for the purpose of re-establishing OPERABILITY for inoperable equipment. This changes the CTS by allowing the specified surveillances to be performed in a MODE that is not currently allowed.	Note to SR 3.8.1.8, SR 3.8.1.12, and SR 3.8.1.13	4.8.1.1.1 and 4.8.1.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.11	CTS LCO 3.7.4.1, Service Water System – Operating, states, “Two service water loops (shared with the other unit) shall be OPERABLE with each loop consisting of two OPERABLE service water pumps (excluding auxiliary service water pumps) with their associated normal and emergency power supplies, and an OPERABLE flow path . . . .” Each unit’s service water system requirements consist of the above requirements for either unit operating in MODES 1, 2, 3, or 4. CTS LCO 3.7.3.1, Component Cooling Water System – Operating, requires three component cooling water subsystems (shared with the other unit) shall be OPERABLE. This requirement must be met with either unit is in MODES 1, 2, 3, or 4. ITS LCO 3.7.10 specifies the requirements for the Main Control Room (MCR) / Emergency Switchgear Room (ESGR) Habitability System. This system requires the MCR and ESGR fans on both units to be OPERABLE in MODES 1, 2, 3, and 4 and during the movement of recently irradiated fuel assemblies. ITS LCO 3.7.12 requires the fans from the Auxiliary Building central exhaust system to be OPERABLE to support the Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System. This could require a fan powered from the other unit to be required for this unit. The SW and CC pumps and the fans from the ventilation systems are components that may be required by either or both units. Therefore, these pumps and fans are classified as “shared components,” for the electrical power requirements. ITS LCO 3.8.1 Actions A, B, and C provide for an evaluation of all safety functions powered by this unit’s AC sources and provide 72 hours for an inoperable offsite circuit and up to 14 days for an inoperable EDG. ITS 3.8.1 Action D for one or more offsite circuit(s), and Actions E and F for an inoperable EDG on the other unit that is needed to support a shared components. This changes the CTS by allowing a shared components to be considered OPERABLE for up to 72 hours with a required offsite circuit(s) inoperable and up to 14 days for an inoperable EDG on the other unit.	LCO 3.7.10, LCO 3.7.12, LCO 3.7.19, LCO 3.8.1 Actions A, B, C, D, E, and F	3.7.4.1	4

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.12	CTS SR 4.8.1.1.2.d.2 states, “Verifying that the load sequencing timers are OPERABLE with times within the tolerances shown in Table 3.8-1.” If the requirement can not be met, the EDG is declared inoperable and the appropriate Action entered. ITS LCO 3.8.1.c requires the following AC electrical sources shall be OPERABLE with the sequencing timing relays for Train H and Train J. ITS Required Action K.1 states with one or more sequencing timing relay(s) inoperable, immediately enter appropriate Conditions and Required Actions for system, subsystem, or component made inoperable by sequencing timing relay(s). Required Action K.2.1 states, “Place the component(s) with the inoperable sequencing timing relay in a condition where it can not automatically load to the associated emergency electrical bus.” Required Action K.2.2 provides an option to declare the associated EDG inoperable. This changes the CTS requirements by allowing a system, subsystem or component served by an inoperable sequencing timing relay to be declared inoperable, instead of the electrical source(s).	LCO 3.8.1.c, Required Action K.2.1, Required Action K.2.2	4.8.1.1.2.d.2	1
3.8.1 L.13	CTS Surveillance Requirement 4.8.1.1.2.d.7 states, “Verifying that the auto-connected loads to each EDG do not exceed the 2000 hour rating of 3000 kw.” ITS 3.8.1 does not require the verification of loading limit to ensure OPERABILITY of the EDGs. This changes the CTS by deleting the surveillance requirement.	None	4.8.1.1.2.d.7	5

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.14	CTS 3.8.1.1 Action b states that the OPERABLE EDG must be demonstrated to be OPERABLE within 24 hours unless the absence of any potential common mode failure is demonstrated. This is required if the inoperable EDG inoperability is due to any cause "other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing," ITS Required Action B.3 states "Determine OPERABLE LCO 3.8.1.b EDG is not inoperable due to common cause failure." This changes the CTS by allowing a determination for common cause failure, instead of requiring a demonstration for a potential common mode failure, for the OPERABLE EDG.	3.8.1 Required Action B.3	3.8.1.1 Action b	4
3.8.1 L.15	CTS Surveillance Requirement 4.8.1.1.2 contains the requirement to perform various tests for the EDGs "during shutdown." ITS SRs 3.8.1.10, 3.8.1.11, 3.8.1.15, 3.8.1.16, and 3.8.1.17 are modified in a Note that states the Surveillance shall not normally be performed in specific MODES. An additional statement modifies the Note. It allows a full or partial Surveillance to be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. This changes the CTS requirements for testing of the EDGs by allowing the listed tests to be performed in MODES in which they are normally prohibited from being conducted.	Note to SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.15, SR 3.8.1.16, and SR 3.8.1.17	4.8.1.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.16	CTS 4.8.1.1.2.a.3 states, “Verifying the fuel oil transfer pump can be started and transfers fuel from the storage tank to the day tank.” This requirement shall be performed with a frequency specified in Table 4.8-2 on a Staggered Test Basis (STB). Table 4.8-2 states that the EDG test schedule is once per 31 days when the number of test failures is less than one in the past 20 valid tests, and once per 7 days if the number of test failures is two or more in the previous 20 valid tests. ITS SR 3.8.1.6 states, “Verify each required fuel oil transfer pump operates to transfer fuel oil from the storage tank to the day tank,” and the requirement is required to be performed every 92 days. This changes the CTS by decreasing the SR Frequency from 7 or 31 days on a STB to every 92 days.	3.8.1.6	4.8.1.1.2.a.3, Table 4.8-2	7
3.8.1 L.17	CTS 4.8.1.1.1.2.c states that every 184 days the EDG will be started within 10 seconds by one of the following signals on a rotating test basis. The signals are a simulated loss of offsite power, simulated loss of offsite power with an ESF actuation, and an ESF actuation. The start requires specific values of voltage and frequency to be obtained within specified limits. ITS SR 3.8.1.7 states that each EDG is started within 10 seconds every 184 days. The start requires specific values of voltage and frequency to be obtained within specified limits. This changes the CTS by eliminating the specific start signals.	SR 3.8.1.7	4.8.1.1.1.2.c	6
3.8.1 L.18	CTS Surveillance Requirement 4.8.1.1.2 contains the requirement to perform various testing “during shutdown.” ITS SR 3.8.1.18 removes the MODE restrictions for performing the required testing. This changes the CTS requirements for testing of the AC sources by allowing this test to be performed in any MODE.	SR 3.8.1.18	4.8.1.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.1 L.19	CTS surveillance requirements 4.8.1.1.2 a.4, c, d.3, d.4, d.5.b, d.6, d.10, and e state that the EDG shall be started and are modified by a note labeled **. The note requires the test to be conducted in accordance with the manufacturer's recommendations, "regarding engine prelube and warmup procedure, and as applicable regarding loading recommendations." ITS SRs 3.8.1.7, 3.8.1.10, 3.8.1.11, 3.8.1.14, 3.8.1.17, and 3.8.1.18 state this allowance as a Note to each SR. The Note states, "All EDG starts may be preceded by an engine prelube period." No loading requirements for the SRs have been included because they were not appropriate. This changes the CTS by not requiring the manufacturer's recommendations to be followed, because the ITS states that these recommendations "may" be followed.	Note to SR 3.8.1.7, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.14, SR 3.8.1.17, SR 3.8.1.18	Footnote ** to 4.8.1.1.2.a.4, 4.8.1.1.2.c, 4.8.1.1.2.d.3, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5.b, 4.8.1.1.2.d.6, 4.8.1.1.2.d.10, 4.8.1.1.2.e	6
3.8.1 L.20	CTS Surveillance Requirement 4.8.1.1.2.d.1 requires verification that an EDG provides power at the appropriate frequency and voltage following a load rejection. CTS 4.8.1.1.2.d states that this test is to be performed every 18 months "during shutdown." This Surveillance is performed during shutdown, but an identical test is performed at power following on-line EDG maintenance. ITS SR 3.8.1.9 does not restrict performance of the SR in any MODE. This changes the CTS by allowing the MODE 1, 2, 3 or 4 performance of the load rejection test to be credited for meeting the Surveillance.	SR 3.8.1.9	4.8.1.1.2.d.1	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.2 L.1	CTS 3.8.1.2 Action a requires with less than the minimum required A.C. electrical power sources of one train (one circuit, between the offsite transmission network and the onsite Class 1E distribution system, and one diesel generator) immediately suspend all operations involving specific tasks. These activities include CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.2 Action A.1 adds an allowance to this requirement. This allows the affected required feature(s) with no offsite power available to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This would allow the utilization of the feature(s) Required Actions while continuing with activities, such as a plant cooldown. The CTS requirements do not allow this provision.	3.8.2 Required Action A.1	3.8.1.2 Action a	4
3.8.2 L.2	CTS surveillance requirement 4.8.1.2 states, "The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1, 4.8.1.1.2, 4.8.1.1.3, and 4.8.1.1.4." ITS SR 3.8.2.1 states the required SRs but adds a Note which states, "The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.6, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15 and SR 3.8.1.16." This changes the CTS to allow specific surveillance requirements to not be performed on the required equipment during the time that only one offsite source and one EDG are required to be OPERABLE.	SR 3.8.2.1 Note	4.8.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.2 L.3	CTS Surveillance Requirement 4.8.1.2 states, “The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1, 4.8.1.1.2, 4.8.1.1.3, and 4.8.1.1.4.” ITS SR 3.8.2.1 states that the listed SRs are applicable. The list is composed of SRs 3.8.1.1, 3.8.1.2, 3.8.1.3, 3.8.1.4, 3.8.1.5, 3.8.1.6, 3.8.1.7, 3.8.1.9, 3.8.1.10, 3.8.1.12, 3.8.1.13, 3.8.1.14, 3.8.1.15, and 3.8.1.16. This changes the CTS by not requiring Surveillances 4.8.1.1.1.b, 4.8.1.1.2.d.4, 4.8.1.1.2.d.5, and 4.8.1.1.2.eto be performed on the AC circuit and EDG that are OPERABLE.	SR 3.8.2.1	4.8.1.2	6
3.8.2 L.4	CTS 3.8.1.2 Action a. specifies with less than the required AC electrical sources OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.2 Required Actions B.2.3 and C.3 modify this requirement and state, “Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.” This changes the CTS requirement by allowing operations that are a positive reactivity change.	3 8.2 Required Actions B.2.3 and C.3	3.8.1.2 Action a	4
3.8.2 L.5	CTS LCO 3.8.1.2 Applicability states, “loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel.” CTS 3.8.1.2 Action a. requires with less that the minimum required A.C. electrical power sources, all operations involving movement of loads over irradiated fuel assemblies shall be immediately suspended. ITS LCO and Actions of 3.8.2 do not specify these requirements. This changes the CTS by deleting the applicability during movement of loads over irradiated fuel assemblies.	None	3.8.1.2 Applicability 3.8.1.2 Action a	2

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



Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.2 L.6	The Applicability for CTS 3.8.2.1, AC sources, states, “during the movement of irradiated fuel assemblies.” The associated Action states with the required AC sources not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.5 Applicability states, “during the movement of recently irradiated fuel assemblies.” This changes the CTS by restricting the AC sources requirements to during the movement of fuel assemblies that have been recently irradiated.	LCO 3.8.5 Applicability	3.8.2.1 Applicability	2
3.8.3 L.1	CTS 3.8.1.1 requirements for diesel fuel oil states the fuel oil tanks will contain 45,000 gallons each to support the EDGs’ OPERABILITY requirements. If the volume is less than this amount, the associated EDGs are to be declared inoperable. ITS 3.8.3 Condition B allows 48 hours to restore a fuel oil level to 90,000 gallons, provided the level is 77,200 gallons or greater, before declaring the EDG(s) inoperable. This changes the CTS by allowing the diesel fuel oil requirement to decrease below the current limit.	3.8.3 Condition B	3.8.1.1	4
3.8.3 L.2	Not used.	N/A	N/A	N/A
3.8.3 L.3	CTS 3.8.1.1.2.b states that every 92 days a sample from the fuel oil storage tank is verified to be within acceptable limits. If this requirement can not be met, the associated EDGs are declared inoperable. ITS Action E states that with one or more EDGs with new fuel oil properties not within limits, 30 days is allowed to restore stored fuel oil properties within limits. This changes the CTS by allowing 30 days to restore fuel oil within required limits.	3.8.3 Action E	3.8.1.1.2.b	3

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.3 L.4	CTS 3.8.1.1.f allows one of the underground fuel oil storage tanks to be inoperable for inspection and repair provided certain conditions are met and the tank is restored within 7 days. If those conditions are not met or the tank is not restored within 7 days, both units must be in at least Hot Standby within the next 6 hours and Cold Shutdown within the following 30 hours. ITS 3.8.1, Condition A, allows one of the underground fuel oil storage tanks to be inoperable for inspection and repair provided certain conditions are met and the tank is restored within 7 days. If those conditions are not met or the tank is not restored within 7 days, ITS Condition F requires the associated EDGs to be declared inoperable immediately. Once the associated EDGs are declared inoperable, the appropriate Conditions and Required Actions of Specification 3.8.1 must be followed. ITS 3.8.1, Condition I, which applies with two EDGs inoperable, allows two hours to restore one EDG and then Condition L requires the unit to be in MODE 3 in 6 hours and MODE 5 in 36 hours. This changes the CTS by allowing an additional 2 hours to restore compliance with LCO 3.8.3 or LCO 3.8.1 if the Required Actions of Condition A are not met.	3.8.1 Condition A	3.8.1.1.f	4
3.8.4 L.1	CTS Surveillance Requirements 4.8.2.3.2 e. and 4.8.1.1.3 d. require verification at least every 60 months that the station and EDG battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. ITS SR 3.8.4.9 requires verification that the station and EDG battery capacity is $\geq 80\%$ of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. This changes the CTS by allowing a modified performance discharge test to be substituted for a performance discharge test.	SR 3.8.4.9	4.8.2.3.2.e 4.8.1.1.3.d	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.4 L.2	CTS Surveillance Requirements 4.8.2.3.2 b.2 and 4.8.1.1.3 b.2 require, for the station and EDG batteries that no visible corrosion is detected at either terminals or connectors within 7 days after a battery discharge below 110 volts or overcharge above 115 volts. The connection resistance of these items is limited to less than 150 micro-ohms. ITS SR 3.8.4.2 requires, for the station and EDG batteries, no visible corrosion at the battery terminal connections and connectors be detected, or the battery connection resistance is $\leq 1.5 \text{ E-4 ohms}$ for the inter-cell, inter-rack, inter-tier, or terminal connections. This changes the CTS by eliminating the verification of visible corrosion or connection resistance after a battery discharge or overcharge.	SR 3.8.4.2	4.8.2.3.2.b.2 and 4.8.1.1.3.b.2	6
3.8.4 L.3	CTS Surveillance Requirements 4.8.2.3.2 d, e, and f, and 4.8.1.1.3 d. and e. contain the requirement to perform various tests for batteries “during shutdown.” ITS SRs 3.8.4.8 and 3.8.4.9 are modified in a Note that states the Surveillance shall not normally be performed in specific MODES. An additional statement modifies the Note. It allows a partial Surveillance to be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. This changes the CTS requirements for testing of the EDGs by allowing the listed tests to be performed in MODES in which they are normally prohibited from being conducted.	SR 3.8.4.8, SR 3.8.4.9	4.8.2.3.2.d, 4.8.2.3.2.e, 4.8.2.3.2.f, 4.8.1.1.3.d 4.8.1.1.3.e.	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.4 L.4	CTS Surveillance Requirements 4.8.2.3.2 d. requires verification of the station battery capacity when the battery is subjected to a service test. ITS SR 3.8.4.8 requires verification that the station battery capacity when subjected to a service test. The SR is modified by Note 1 that states, "The modified performance discharge test in SR 3.8.4.9 may be performed in lieu of the service test in SR 3.8.4.8." This changes the CTS by allowing a modified performance discharge test to be substituted for a service test.	SR 3.8.4.8, Note 1	4.8.2.3.2.d	6
3.8.4 L.5	CTS Surveillance Requirement 4.8.2.3.2.c.3 specifies for the battery charger to supply 200 amps at 125 volts for at least 4 hours. ITS SR 3.8.4.6 states, "Verify each required station battery charger supplies $\geq 270$ amps at $\geq 125$ V for $\geq 4$ hours. This changes the CTS by allowing the battery charger voltage to be 125 volts or greater for the required surveillance test.	SR 3.8.4.6	4.8.2.3.2.c.3	6
3.8.4 L.6	CTS 4.8.2.3.2.c.2 and 4.8.1.1.3.c.2 require that the cell-to-cell and terminal connections for the station and EDG batteries be clean, tight and coated with anti-corrosion material. ITS SR 3.8.4.4 in part states, "For each required station and EDG battery . . . verify battery cell to cell and terminal connections are clean and coated with anti-corrosion material." This changes the CTS by deleting the "tight" requirement from the surveillance requirement.	SR 3.8.4.4	4.8.2.3.2.c.2, 4.8.1.1.3.c.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.5 L.1	CTS 3.8.2.2 Applicability includes, “During the movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel.” ITS 3.8.5 Applicability includes, “During the movement of recently irradiated fuel assemblies.” This changes the CTS by deleting the applicability requirement, “loads over irradiated fuel assemblies when no fuel assemblies are in the in the reactor vessel.” The addition of the word "recently" to the Applicability is discussed in DOC L.5.	3.8.5 Applicability	3.8.2.2 Applicability	2
3.8.5 L.2	CTS 3.8.2.2 Action requires that with less than the minimum DC sources OPERABLE operations, involving CORE ALTERATIONS or positive reactivity additions, be suspended immediately, and corrective action be initiated to restore the required DC source(s) as soon as possible. ITS 3.8.5 Required Action A.1.1 provides an alternative by allowing, “Declare affected required feature(s) inoperable immediately.” This changes the CTS by not requiring the immediate suspension of activities involving CORE ALTERATION or positive reactivity additions.	3.8.5 Required Action A.1.1	3.8.2.2 Action	4
3.8.5 L.3	CTS 3.8.2.2 Action states with less than the minimum DC sources OPERABLE immediately suspend positive reactivity changes. ITS 3.8.5 Required Action A.2.3 states “suspend reactivity changes that are more positive than necessary to meet the required SDM or refueling boron concentration limit.” This changes the CTS by allowing positive reactivity changes that are currently not allowed.	3.8.5 Required Action A.2.3	3.8.2.2 Action	4
3.8.5 L.4	CTS 4.8.2.2.2 for Unit 1 and 4.8.2.1.2 for Unit 2 state the required equipment shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.2. ITS SR 3.8.5.1 includes a Note stating that specified tests are not required to be performed. These include the following SRs: 3.8.4.7, 3.8.4.8, and 3.8.4.9. This changes the CTS by specifically stating that certain SRs are not required to be performed.	SR 3.8.5.1 Note	Unit 1 4.8.2.2.2, Unit 2 4.8.2.1.2	6

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.5 L.5	CTS 3.8.2.2 Applicability for the DC source requirement states during the movement of irradiated fuel assemblies. The associated Action states with the required DC buses not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.5 Applicability states during the movement of recently irradiated fuel assemblies. This changes the CTS by not applying the DC source requirements during the movement of fuel assemblies that have not been recently irradiated.	LCO 3.8.5 Applicability	3.8.2.2 Applicability	2
3.8.5 L.6	CTS 3.8.2.2 LCO states, “As a minimum, one of the following trains of AC and DC busses shall be OPERABLE and energized in the specified manner.” The LCO lists the equipment that makes up the H and J trains electrical subsystems. ITS LCOs 3.8.7 and 3.8.9 addresses the AC buses for shutdown conditions. ITS LCO 3.8.5 states, “DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, “Distribution System – Shutdown.” ITS LCO 3.8.10 requires the “necessary portions” of the DC power distribution subsystems to be OPERABLE to support equipment required to be OPERABLE. This changes the CTS by requiring only the necessary portions of the DC subsystem(s) to be OPERABLE, instead of one train.	LCO 3.8.5, LCO 3.8.7, LCO 3.8.9, LCO 3.8.10	LCO 3.8.2.2	I

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.6 L.1	CTS Table 4.8-3 notes (1) and (2) specify 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 restored to within limits within 7 days." ITS 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, Required Action A.2 requires the verification of battery cell parameters in Table 3.8.6-1 meet Category C limits and Required Action A.3 requires the restoration of battery cell parameters to Table 3.8.6-1 Category A and B limits. Category C limit verification is required within 24 hours and once per 7 days thereafter. The time limit for restoring the cell parameters to within the Category A and B limits is 31 days. This changes the CTS by allowing the Category A and B limits to be exceeded for a period of 31 days where the CTS only allows 7 days.	3.8.6 Condition A	Table 4.8-3 notes (1) and (2)	3

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.6 L.2	CTS Table 4.8-3 Battery Surveillance Requirement limits for the electrolyte level, in the Category A and B columns, is greater than the minimum level indication mark, and $\leq \frac{1}{4}$ inch mark above the maximum level indication mark. ITS Table 3.8.6-1 states for the Category A and B limits, "> Minimum level indication mark, and $\leq \frac{1}{4}$ inch above maximum level indication mark <sup>(a)</sup> ." Note <sup>(a)</sup> states, "It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing." This changes the CTS by allowing the electrolyte level to exceed the specified limit under specific conditions.	Table 3.8.6-1, Note (a)	Table 4.8-3	6
3.8.6 L.3	CTS Table 4.8-3, Battery Cell Parameters, note (c) states, "For any cell with voltage below the limit and electrolyte temperature > 3 °F from the average electrolyte temperature, correct the cell voltage for the average temperature." This note applies to Category B for the battery cells' float voltage of $\geq 2.13$ volts. ITS 3.8.6 does not require this correction. This changes the CTS by deleting the requirement for cell voltage to be corrected by temperature.	None	Table 4.8-3 Note ©	6
3.8.7 None	N/A	N/A	N/A	N/A
3.8.8 L.1	CTS 3.8.2.2 is applicable in MODES 5 and 6 and during movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel. CTS 3.8.2.2 Action also requires suspension of movement of loads over irradiated fuel assemblies. ITS 3.8.8 is applicable in MODES 5 and 6, and during movement of irradiated fuel assemblies. This changes the CTS by deleting the applicability during movement of loads over irradiated fuel assemblies and the associated required action.	3.8.8 Applicability	3.8.2.2 Applicability	2

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



Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.8 L.2	CTS 3.8.2.2 Action states that with less than the minimum required electrical busses OPERABLE, immediately suspend CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.8 Action A.1 adds an optional Action allowing the affected required feature(s), without the required buses, to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This allows the performance of the feature(s) Required Actions while continuing with unit operations, such as a plant cooldown. The CTS requirements do not allow this option.	3.8.8 Action A.1	3.8.2.2 Action	4
3.8.8 L.3	CTS 3.8.2.2 Action requires that with less than the required electrical busses OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.8 Required Action A.2.3 states, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing limited operations that include a positive reactivity change.	3.8.8 Required Action A.2.3	3.8.2.2 Action	4
3.8.8 L.4	CTS 3.8.2.2 Applicability for the inverter requirement states during the movement of irradiated fuel assemblies. The associated Action states with the required inverter not fully OPERABLE immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.8 Applicability states during the movement of recently irradiated fuel assemblies. This changes the CTS by excluding the inverter requirement during the movement of fuel assemblies that have not been recently irradiated.	3.8.8 Applicability	3.8.2.2 Applicability	2

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.9 L.1	CTS 3.8.2.1 Actions a and b state that one of the required buses may not be fully energized and each Action provides appropriate time for the inoperable bus to be re-energized. CTS 3.8.2.3 Action a states that with one 125-volt DC bus inoperable, restore the inoperable bus to OPERABLE status within 2 hours. ITS LCO 3.8.9 Conditions A, B, and C state that with one or more of the required AC electrical power distribution subsystems inoperable, DC, or AC vital buses are inoperable. The required buses must be restore to OPERABLE status within specified times. This changes the CTS by allowing more than one required electrical power distribution subsystems or buses to be inoperable.	3.8.9 Conditions A, B, and C	3.8.2.1 Actions a and b, 3.8.2.3 Action a	4
3.8.10 L.1	CTS 3.8.2.2 is applicable during MODES 5 and 6 and during movement of irradiated fuel assemblies or loads over irradiated fuel assemblies when no fuel assemblies are in the reactor vessel. CTS 3.8.2.2 Action also prohibits movement of loads over irradiated fuel assemblies. ITS 3.8.10 is applicable in MODES 5 and 6, and during movement of irradiated fuel assemblies. This changes the CTS by deleting from the applicability the movement of loads over irradiated fuel assemblies and the associated required action.	3.8.10 Applicability	3.8.2.2 Applicability	2
3.8.10 L.2	CTS 3.8.2.2 Action states that with less than the minimum required electrical busses OPERABLE, immediately suspend CORE ALTERATIONS, positive reactivity changes, and the movement, or movement of load over, irradiated fuel assemblies. ITS 3.8.10 Action A.1 adds an optional Action allowing the affected required feature(s), without the required buses, to be declared inoperable and enter the feature(s) Conditions and Required Actions requirements for the specific function. This would allow the performance of the feature(s) Required Actions while continuing with unit operations, such as a plant cooldown. The CTS requirements do not allow this option.	3.8.10 Action A.1	3.8.2.2 Action	4

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

Table L – Less Restrictive Changes  
ITS Section 3.8 – Electrical Power Systems

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Type
3.8.10 L.3	CTS 3.8.2.2 Action requires that with less than the required electrical busses OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.10 Required Action A.2.3 states, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing limited operations that includes a positive reactivity change.	3.8.10 Required Action A.2.3	3.8.2.2 Action	4
3.8.10 L.4	CTS 3.8.2.2 for the AC and DC distribution systems in shutdown is applicable during the movement of irradiated fuel assemblies. The associated Action states with the required systems not fully OPERABLE, immediately suspend all operations involving movement of irradiated fuel assemblies. ITS LCO 3.8.10 is applicable during the movement of recently irradiated fuel assemblies. This changes the CTS by excluding distribution systems during the movement of fuel assemblies that have not been recently irradiated.	3.8.10 Applicability	3.8.2.2 Applicability	2
3.8.10 L.5	CTS LCO 3.8.2.2 states, "As a minimum one of the following trains of AC and DC busses shall be OPERABLE . . ." This would require either the H or J train AC and DC buses to be OPERABLE. The H train specifies the two 120 VAC buses (1-1 and 2 or 2-1 and 2) are energized from their associated inverter. The J train similarly states that the two 120 VAC buses (1-3 and 4 or 2-3 and 4) are energized from their associated inverter. ITS LCO 3.8.10 states, "The necessary portion of AC, DC, and AC vital bus power distribution subsystems shall be OPERABLE to support the equipment required to be OPERABLE." This changes the CTS by requiring only the necessary portions of the AC, DC, and AC vital bus distribution subsystems to be OPERABLE.	LCO 3.8.10	LCO 3.8.2.2	1

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L.1	CTS 3.9.1 ACTION states that when the boron concentration requirement is not met, initiate and continue boration at $>10$ gpm of $> 12,950$ ppm boric acid solution or its equivalent until $K_{eff}$ is reduced to $\leq 0.95$ or the boron concentration is restored to $\geq 2300$ ppm, whichever is more restrictive. ITS 3.9.1 requires initiation of action to restore boron concentration to within limit. This changes the CTS by eliminating the specific requirements for the boric acid solution to be used to restore compliance with the LCO.	3.9.1 ACTIONS	3.9.1 Action	4
3.9.1 L.2	CTS 4.9.1.1 requires the LCO reactivity condition to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full length control rod located within the reactor pressure vessel, in excess of 3 feet from its fully inserted position. ITS 3.9.1 does not contain this Surveillance Requirement.	None	4.9.1.1	5
3.9.1 L.3	CTS 3.9.1 provides limits on the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal. ITS 3.9.1 modifies this requirement with a Note which states, "Only applicable to the refueling canal and refueling cavity when connected to the RCS." This changes the CTS by eliminating the applicability of the boron concentration limits on the refueling canal and refueling cavity when those volumes are not connected to the RCS.	LCO 3.9.1 Note	3.9.1	2

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.2 L.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% $\Delta k/k$ within 60 minutes. ITS 3.9.2 Actions state that 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 and Unit 2 CTS by eliminating the requirement to suspend positive reactivity additions and changes the Unit 2 CTS by allowing 4 hours to determine the SHUTDOWN MARGIN. The addition of the SHUTDOWN MARGIN measurement to the Unit 1 CTS is discussed in DOC M.1.	3.9.2 Actions	3.1.1.3.2	4
3.9.3 L.1	CTS 3.9.2 Action states that with less than two source range instrumentation channels OPERABLE, immediately suspend all operations involving positive reactivity changes. ITS 3.9.3 Action A.2 adds an allowance to this requirement, which states, "Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1." This allows positive reactivity changes provided they do not reduce the boron concentration below the refueling limit. This changes the CTS requirements by allowing a limited positive reactivity additions.	3.9.3, Action A.2	3.9.2 Action	4

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.3 L.2	CTS surveillance requirement 4.9.2 states that a CHANNEL FUNCTION TEST is required for the source range neutron flux monitors at least once per 7 days and within 8 hours prior to the initial start of CORE ALTERATIONS. ITS SRs do not require the performance of similar tests for the source range instruments. This changes the CTS by deleting the CHANNEL FUNCTIONAL TESTS every 7 days and within 8 hours of CORE ALTERATIONS.	None	4.9.2	5
3.9.3 L.3	CTS LCO 3.9.2 states that two source range neutron flux monitors shall be operating, each with continuous visual indication in the control room and one with audible indication in the containment. ITS LCO 3.9.3 states that two source range neutron flux monitors shall be OPERABLE. The movement of continuous visual indication in the control room is addressed by DOC LA.1. This changes the CTS by deleting the requirement for an audible indication in the containment from the source range neutron flux monitors.	LCO 3.9.3	LCO 3.9.2	1
3.9.4 L.1	CTS 3.9.4.c.1 states that one option for the status of a containment penetration is for it to be, "Closed by an isolation valve, blind flange, or manual valve." ITS 3.9.4.c.1 states that one option for the status of a containment penetration is, "Closed by a manual or automatic isolation valve, blind flange, or equivalent." As all isolation valves are either manual or automatic, the addition of this phrase to the CTS does not result in a change. This changes the CTS by eliminating the phrase "manual valve" and adding the option of having, "or equivalent," as the means of closing the penetration.	3.9.4.c.1	3.9.4.c.1	1

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.2	CTS 4.9.4 states that specified containment penetration surveillances shall be performed, “within 100 hours prior to the start of and at least once per 7 days during...” the specified conditions. ITS SR 3.9.4.1 do not include the, “within 100 hours prior to the start of” Frequency. ITS SR 3.0.1 states, “SRs shall be met during the MODES or other specified conditions in the Applicability for the individual LCOs, unless otherwise stated in the SR.” Therefore, under the ITS, the Surveillances must be met prior to the initiation of movement of recently irradiated fuel. This changes the CTS by eliminating the stipulation that the Surveillances be met within 100 hours prior to entering the MODE of Applicability.	SR 3.9.4.1	4.9.4	7
3.9.4 L.3	CTS 4.9.4 includes a surveillance Frequency of once per 7 days during specified times in the MODE of Applicability for testing Containment Purge and Exhaust System OPERABILITY. The ITS SR 3.9.4.2 Frequency for the same requirement is 18 months. This changes the CTS by changing the Surveillance Frequency from 7 days to 18 months.	SR 3.9.4.2	4.9.4	7
3.9.4 L.4	ITS LCO 3.9.4 Note states, “Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.” CTS 3.9.4 does not include such an allowance. This changes the CTS by allowing containment penetration flow paths to be unisolated under administrative controls during movement of recently irradiated fuel assemblies.	LCO 3.9.4 Note	None	1

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.5	CTS 3.9.4 is applicable during CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. ITS 3.9.4 is applicable during movement of recently irradiated fuel assemblies within containment. References to CORE ALTERATIONS in CTS 3.9.4 are eliminated in the Applicability, Action, and Surveillances. All references in CTS 3.9.4 to irradiated fuel are changed to "recently" irradiated fuel. This changes the CTS by eliminating requirements for containment closure during CORE ALTERATIONS and movement of fuel that is not recently irradiated.	3.9.4	3.9.4	2
3.9.4 L.6	CTS 3.9.4.c.2 requires open containment purge and exhaust valves to be capable of being closed by an OPERABLE automatic Containment Purge and Exhaust isolation valve. CTS Surveillance 4.9.4.b requires testing the Containment Purge and Exhaust isolation valves and system per the applicable portions of Specification 4.6.3.1.2 and 4.9.9. CTS Surveillance 4.6.3.1.2.c requires verifying every 18 months that on a Containment Purge and Exhaust isolation signal, each Purge and Exhaust valve actuates to its isolation position. ITS LCO 3.9.4.c.2 states that open containment purge and exhaust valves be capable of being closed by an OPERABLE isolation valve. ITS SR 3.9.4.2 requires verification that each required containment purge and exhaust valve actuates to the isolation position on manual initiation. This changes the CTS by eliminating the requirement that open containment purge and exhaust valves close automatically on a Containment Purge and Exhaust isolation signal.	LCO 3.9.4.c.2, SR 3.9.4.2	3.9.4.c.2, 4.9.4.b, 4.6.3.1.2.c	1
3.9.4 L.7	CTS 3.9.4.b, footnote *, part b.2, states that if both personnel airlock doors are open, there must be at least 23 feet of water above the top of irradiated fuel assemblies within the reactor pressure vessel during CORE ALTERATIONS excluding movement of fuel assemblies. The ITS does not have that restriction. This changes the CTS by eliminating the requirement on water level during CORE ALTERATIONS when both containment personnel airlock doors are open.	None	3.9.4.b, Footnote *, part b.2	1

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



Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.8	CTS 3.9.4.b is modified by a footnote * and part a of footnote * states that both doors of the containment personnel airlock may be open provided one door is capable of being closed "and that an individual is designated to close the door." ITS LCO 3.9.4 allows both doors of the containment personnel airlock to be open provided one door is capable of being closed. This changes the CTS by eliminating the requirement that "an individual is designated to close the door."	LCO 3.9.4	3.9.4.b, Footnote *, part a	1
3.9.5 L.1	CTS 3.9.8.1 states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.5 states that with the RHR loop requirements not met, within 4 hours secure the equipment hatch with at least four bolts, close one door in each installed air lock, and close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when the RHR requirements are not met.	3.9.5	3.9.8.1	4
3.9.5 L.2	CTS 4.9.8.1.2 states that an RHR loop must be verified to be in operation and providing the required flow at least once per 4 hours. ITS SR 3.9.5.1 requires verification that one RHR loop is operating and providing the required flow every 12 hours. This changes the CTS by reducing the Frequency for performing this Surveillance from 4 to 12 hours.	SR 3.9.5.1	4.9.8.1.2	7
3.9.5 L.3	CTS Surveillance 4.9.8.1.1 requires verification that each RHR loop is OPERABLE per Specification 4.0.5. ITS 3.9.5 does not contain this Surveillance.	None	4.9.8.1.1	5

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L.4	CTS 3.9.8.1 states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.5, Action A.1, states that with the RHR loop requirements not met, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in LCO 3.9.1, to be added to the RCS when the RHR requirements are not met.	3.9.5, Action A.1	3.9.8.1	4
3.9.6 L.1	CTS 3.9.8.2 states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.6 states that with no RHR loop in operation, within 4 hours secure the equipment hatch cover with at least four bolts, close one door in each installed air lock, and close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when no RHR loop is in operation.	3.9.6 ACTIONS	3.9.8.2	4
3.9.6 L.2	CTS 4.9.8.2.2 states that an RHR loop must be verified to be in operation and providing the required flow at least once per 4 hours. ITS SR 3.9.6.1 requires verification that one RHR loop is operating and providing the required flow every 12 hours. This changes the CTS by reducing the Frequency for performing this Surveillance from 4 to 12 hours.	SR 3.9.6.1	4.9.8.2.2	7
3.9.6 L.3	CTS Surveillance 4.9.8.2.1 requires verification that each RHR loop is OPERABLE per Specification 4.0.5. ITS 3.9.6 does not contain this Surveillance.	None	4.9.8.2.1	5

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L.4	CTS 3.9.8.2 states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. ITS 3.9.6, Action B.1, states that with the RHR loop requirements not met, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in LCO 3.9.1, to be added to the RCS when the RHR requirements are not met.	3.9.6, Action B.1	3.9.8.2	4
3.9.6 L.5	ITS 3.9.6 is modified by two LCO Notes. Note 1 allows all RHR pumps to be removed from operation for $\leq$ 15 minutes when switching from one train to another, provided several conditions are met. Note 2 allows one required RHR loop to be inoperable for up to 2 hours for Surveillance testing, provided that the other loop is OPERABLE and in operation. CTS 3.9.8.2 does not contain these allowances. This changes the CTS by providing allowing the LCO to not be met.	LCO 3.9.6 Notes	None	1
3.9.7 L.1	CTS 3.9.10.1 states that at least 23 feet of water must be maintained over the reactor pressure vessel flange in MODE 6 during movement of fuel assemblies within the containment. The 3.9.10.1 Action requires suspension of movement of fuel assemblies if the water level requirement is not met. ITS 3.9.7 states the refueling cavity water level shall be maintained $\geq$ 23 feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. ITS 3.9.7, Action A.2, requires the suspension of movement o irradiated fuel assemblies within containment. This changes the CTS restricting the applicability and Actions from movement of any fuel assemblies within containment to movement of irradiated fuel within containment. The change eliminating MODE 6 is discussed in DOC A.3.	LCO 3.9.7	3.9.10.1	2

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

Table L – Less Restrictive Changes  
ITS Section 3.9 – Refueling Operations

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.7 L.2	CTS 4.9.10.1 requires the refueling cavity water level to be determined to be within limit within 2 hours prior to the start of and at least once per 24 hours during movement of fuel assemblies. ITS SR 3.7.9.1 requires verification that the refueling cavity water level is within limit every 24 hours. This changes the CTS by reducing the Frequency for verifying refueling cavity water level from 2 hours before fuel movement to 24 hours before fuel movement.	SR 3.7.9.1	4.9.10.1	7

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

Table L – Less Restrictive Changes  
ITS Section 4.0 – Design Features

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
4.0 L.1	CTS 5.6.2 states that the spent fuel pit is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 288.83 feet Mean Sea Level, USGS datum. ITS 4.3.2 states, "The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 285 feet, 9 inches, Mean Sea Level, USGS datum." This changes the CTS by reducing the minimum design water level of the spent fuel pool from 288.83 feet to 285 feet, 9 inches.	4.3.2	5.6.2	Note 1

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

Note 1 - The Less Restrictive changes for Chapter 4.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Chapter 4 0.

Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.1	CTS Table 6.2-1 specifies that the shift crew may be one less than the minimum complement, except for the Shift Supervisor, for a period of time not to exceed 2 hours. CTS Table 6.2-1 also takes an exception that the provision for being less than minimum shift crew complement does not apply for any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. ITS 5.2.2.b does not make these exceptions to the requirements of 10 CFR 50.54 (m)(2)(i). This changes the CTS by allowing shift crew composition to be less than the manning requirements without specifying exceptions to this allowance.	5.2.2.b	Table 6.2-1	Note 1
5.0 L.2	CTS 6.9.1.5.c states the contents of an annual report to be submitted to the Nuclear Regulatory Commission which contains the results of specific activity analyses in which the primary coolant exceeded the limits of the RCS Specific Activity Specification. ITS 5.6 does not contain any requirements for such an annual report. This changes the CTS by not including the requirements for the annual report of specific activity analyses in which the primary coolant exceeded the limits of the RCS Specific Activity Specification.	None	6.9.1.5.c	8
5.0 L.3	CTS 6.2.2 states, "The Facility organization shall be as shown in the UFSAR." ITS 5.2.2 states, "The Facility organization shall include..." and describes the facility organization. This changes the CTS by deleting the requirement to have the description of the facility organization in the UFSAR.	None	6.2.2	Note 1

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

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.4	CTS 6.1.1 states, "The Site Vice President shall be responsible for overall facility operation. In his absence, the Manager - Station Operations and Maintenance shall be responsible for overall facility operation. During the absence of both, the Site Vice-President shall delegate in writing the succession to this responsibility." ITS 5.1.1 states, "The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence." This changes the CTS by not specifying the title of the person with responsibility for overall facility operation, and allowing the plant manager to delegate the responsibility to someone other than the Manager - Station Operations and Maintenance if that person is not absent	5.1.1	6.1.1	Note 1
5.0 L.5	CTS 6.1.2 states, "A management directive to this effect, signed by the Senior Vice President-Nuclear, shall be issued to all station personnel on an annual basis," regarding delegation of the control room command function. ITS 5.1.2 does not include such a requirement. This changes the CTS by deleting the requirement to issue a management directive annually.	None	6.1.2	Note 1

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

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.

Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.6	CTS 6.2.1.b states, "The Site Vice President shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant." CTS 6.2.1.c states, "The Vice President – Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety." CTS 6.15 states, "Changes to the ODCM:... b. Shall become effective after...the approval of the Site Vice President." CTS 6.3.1.3 states, "The Superintendent Operations shall hold..." CTS 6.3.1.1 states, "The Superintendent – Radiological Protection shall meet..." ITS 5.2.1.b substitutes "plant manager" for "Site Vice President," ITS 5.2.1.c substitutes "A specified corporate officer" for "The Vice President – Nuclear Operations," ITS 5.5.1.b substitutes "plant manager" for "Site Vice President," ITS 5.2.2.e substitutes "operations manager" for "Superintendent Operations," and ITS 5.3.1 substitutes "radiation protection manager" for "Superintendent – Radiological Protection." This changes the CTS by using less specific designations for the positions with the respective responsibilities.	5.2.1.b, 5.2.1.c, 5.5.1.b, 5.2.2.e and 5.3.1	6.2.1.b, 6.2.1.c, 6.1.5, 6.3.1.1 and 6.3.1.3	Note 1
5.0 L.7	CTS 6.9.1.1, CTS 6.9.1.2 and CTS 6.9.1.3, "Startup Reports," contains requirements for submitting a report following receipt of an operating license; installation of fuel that has a different design or has been manufactured by a different fuel supplier; modifications that may have altered the nuclear, thermal, or hydraulic performance of the unit; and amendments to the license involving planned increase in power operation. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.9.1.1, CTS 6.9.1.2 and CTS 6.9.1.3.	None	6.9.1.1, 6.9.1.2 and 6.9.1.3	8

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

Note 1 - Certain Less Restrictive changes for Chapter 5.0 did not fall into the categories used for the other Chapters. A specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.



Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.8	CTS Table 6.2-1 includes requirements on SS, SRO, RO, AO, and STA position manning for each unit that are beyond what is required by 10 CFR 50.54(m)(2)(i). The ITS does not include these conditions. This changes the CTS by deleting certain criteria regarding how manning is distributed.	None	Table 6.2-1	Note 1
5.0 L.9	CTS Table 6.2-1 requires that, with either or both units in MODE 1, 2, 3, or 4, four Auxiliary Operators (AOs) be part of the staff manning, two AOs assigned to each unit. CTS Table 6.2-1 requires that, with both units in MODE 5 or 6 or Defueled, two AOs be part of staff manning, one AO assigned to each unit. ITS 5.2.2.a states, "An auxiliary operator shall be assigned to each reactor containing fuel and an additional auxiliary operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4." When one or two units are in MODES 1, 2, 3, or 4, this changes the CTS by only requiring one AO be assigned for each reactor containing fuel rather than two, and only requiring one additional AO be assigned for each control room from which a reactor is operating. With both units shutdown or defueled, this changes the CTS by only requiring one AO be assigned to each unit containing fuel, rather than one AO be assigned for each unit regardless of whether or not it contains fuel. Other changes to the AO requirements are addressed by DOC M.24.	5.2.2.a	Table 6.2-1	Note 1
5.0 L.10	CTS Table 6.2-1, with regard to work hour procedures, states, "In addition, procedures will provide for documentation of authorized deviations from these guidelines and that the documentation is available for NRC review." ITS 5.0 does not include such a requirement. This changes the CTS by deleting a requirement to have a procedure for documentation of authorized deviations from the work hour guidelines and to have the documentation available for NRC review.	None	Table 6.2-1	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.11	CTS 6.2.2.c references requirements for a health physics technician. CTS 6.12.1, footnote "*" describes a Health Physics technician allowance. CTS 6.12.2 references a responsibility of the Shift Supervisor on duty and/or the Plant Health Physicist. ITS 5.2.2.d references a radiation protection technician, and ITS 5.7.1 references Radiation Protection personnel, and ITS 5.7.2 references the radiation protection shift supervisor, radiation protection manager or his or her designee responsibilities, respectively. This changes the CTS by changing the titles of the personnel in the specified positions to more generic titles.	5.2.2.d, 5.7.1 and 5.7.2	6.2.2.c, 6.12.1 footnote "*", and 6.12.2	Note 1
5.0 L.12	CTS 6.8.4 states that one of the programs to be established, implemented, and maintained is, "A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels." ITS 5.5.2 requires that the program minimize the same leakage. This changes the CTS by requiring the program provide controls to minimize instead of reduce leakage.	5.5.2	6.8.4	Note 1
5.0 L.13	ITS 5.7.2.f states, "Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device." CTS 6.12.2 does not include such an allowance. This changes the CTS by providing an additional method by which to control a high radiation area meeting the criteria of 5.7.2.	5.7.2.f	6.12.2	Note 1

Change Category:

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.14	ITS 5.5.14 provides criteria for the Safety Function Determination Program (SFDP), as referenced in ITS LCO 3.0.6. This provides an exception to ITS LCO 3.0.2 when a supported system LCO is not met solely due to a support system LCO not being met, such that the Conditions and Required Actions associated with this supported system are not required to be entered and there has been no loss of safety function. The CTS do not include such an exception to CTS LCO 3.0.2. This changes the CTS by including the criteria for an exception to CTS LCO 3.0.2.	5.5.14	3.0.2	2
5.0 L.15	CTS 6.9.1.4 requires annual reports described in CTS 6.9.1.5 be submitted prior to March 1 of each year. ITS 5.6.1 requires the Occupational Radiation Exposure Report to be submitted by April 30 of each year. This changes the CTS by allowing an additional 2 months to submit the Occupational Radiation Exposure Report each year.	5.6.1	6.9.1.4 and 6.9.1.5	Note 1
5.0 L.16	CTS 6.12.1 states for high radiation areas, "...entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit." ITS 5.7.1.b and ITS 5.7.2.b state for high radiation areas, "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 allowing an equivalent document to be used for access control. The addition of details required in the RWP is addressed by DOC M.4.	5.7.1.b and 5.7.2.b	6.12.1	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.17	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.” 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.” This changes the Unit 1 CTS by allowing personnel not qualified in radiation protection procedures, but escorted by such qualified individuals to use the exemption from the requirement for an RWP or equivalent while performing their assigned duties. Changing the term “Health Physics” to “radiation protection” is addressed by DOC L.11. Allowing personnel to use the exemption for reasons other than radiation protection duties is addressed by DOC L.34.	5.7.1.c	6.12 footnote “*”	Note 1
5.0 L.18	CTS Table 6.2-1 states the qualifications for the person that assumes the control room command function during the absence of the Shift Supervisor, and excludes the STA as a person who can assume that function. ITS 5.1.2 does not include this exclusion of the STA. This changes the CTS by allowing an STA that holds a valid SRO license to assume the control room command function during the absence of the Shift Supervisor.	5.1.2	Table 6.2-1	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
  - 2 - Relaxation of Applicability
  - 3 - Relaxation of Completion Time
  - 4 - Relaxation of Required Action
  - 5 - Deletion of Surveillance Requirement
  - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
  - 7 - Relaxation Of Surveillance Frequency
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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.19	CTS 6.4.1 states, "The Manager – Nuclear Training is responsible for ensuring that retraining and replacement training programs for the licensed facility staff meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4). Also, a retraining and replacement training program for non-licensed facility staff shall meet or exceed the recommendations of Section 5 of ANS 3.1 (12/79 Draft)*." CTS 6.4.1 footnote "*" states, "Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, "Quality Assurance Program, Operational Phase."" ITS 5.0 does not include these requirements. This changes the CTS by not specifying who is responsible for ensuring the requirements of 10 CFR 55.59(c) and 55.31(a)(4) are met, and not specifying requirements for non-licensed facility staff training.	None	6.4.1	Note 1
5.0 L.20	ITS 5.5.7.c states, "The provisions of SR 3.0.3 are applicable to inservice testing activities." CTS does not include an equivalent statement. This changes the CTS by allowing 24 hours or up to the limit of the Frequency, whichever is less, to perform inservice testing if it is discovered that the inservice testing requirements were not performed, instead of declaring the component inoperable.	5.5.7.c	None	7
5.0 L.21	ITS 5.6.1 allows dose assignments to various duty functions to be estimated using, among other things, an electronic dosimeter. CTS 6.9.1.5 does not include this allowance. This changes the CTS by including an electronic dosimeter as one of the ways by which dose assignments to various duty functions may be estimated.	5.6.1	6.9.1.5	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.22	Unit 1 CTS 4.4.5 Table 4.4-1 states that if an additional steam generator is in category C-3, one Action Required is, "Report to NRC & obtain approval prior to operation." ITS Table 5.5.8-2 for the same condition states, "Report to NRC pursuant to 5.6.7.c." This changes the CTS by not requiring obtaining NRC approval prior to operation in the event an additional steam generator is found to be in the category C-3.	Table 5.5.8-2	Table 4.4-1	Note 1
5.0 L.23	CTS 6.12.2 states, regarding areas in which the intensity of radiation is greater than 1000 mrem/hr, but less than 500 rads/hr at one meter from a radiation source or any surface through which radiation penetrates, "In addition, locked doors shall be provided to prevent unauthorized entry into such areas..." ITS 5.7.2 states, "...areas with radiation levels $\geq$ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry." This changes the CTS by allowing the doors to be guarded as an option to locking them.	5.7.2	6.12.2	Note 1
5.0 L.24	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..." This changes the CTS by not referencing the NRC policy statement guidelines regarding work hours as the source of guidance for limiting work hours.	5.2.2.d	Table 6.2-1	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.25	CTS 6.8.4.a.5 requires, "Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days." ITS 5.5.4 states, "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency." CTS does not include this provision. This changes the CTS by permitting a 25% extension of the interval specified in the Frequency.	5.5.4	6.8.4.a.5	7
5.0 L.26	CTS 6.9.1.6 states, "Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the Reactor Coolant System PORVs or safety valves, shall be submitted on a monthly basis..." ITS 5.6.4 states, "Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis..." This changes the CTS by deleting the requirement to include documentation of all challenges to the Reactor Coolant System PORVs or safety valves in the monthly report.	5.6.4	6.9.1.6	8

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.27	ITS 5.7.1.d.3 states that one of the options for devices an individual or group shall possess for radiation monitoring when entering a high radiation area with a dose rate not exceeding 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation is, "A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area." ITS 5.7.2.d.2 states that one of the options for devices an individual or group shall possess when entering a high radiation area with a dose rate exceeding 1.0 rem/hour at 30 Centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or any surface penetrated by the radiation is, "A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area." CTS 6.12.1 and 6.12.2 do not contain these options for an individual or group. This changes the CTS by providing an additional device an individual entering these high radiation areas must possess for radiation monitoring.	5.7.1.d.3 and 5.7.2.d.2	6.12.1 and 6.12.2	Note 1

Change Category:

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.28	CTS 6.12.1.b states that one of the optional criteria that allow entry into a high radiation area is, "An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit." ITS 5.7.1.d.4 states, "A self reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and, (i) be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or (ii) be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance." ITS 5.7.2.d.3 reads the same as ITS 5.7.1.d.4, except the last phrase, "communicate with individuals in the area who are covered by such surveillance," is replaced with the phrase, "communicate with and control every individual in the area." This changes the CTS by deleting the discussion of positive controls over activities and performing radiation surveillances with a requirement for the monitoring device to have continuous dose rate displays and the responsibility to control dose rates in the area, and an option to perform the monitoring of personnel remotely using the specified equipment and processes.	5.7.1.d.4 and 5.7.2.d.3	6.12.1.b	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.29	ITS 5.7.2.d.4 states that one of the options for devices that an individual or group shall possess when entering a high radiation area with a dose rate exceeding 1.0 rem/hour at 30 Centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or any surface penetrated by the radiation is, "In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area." CTS 6.12.1 and 6.12.2 do not contain these options for an individual or group. This changes the CTS by providing an additional option for devices an individual entering these high radiation areas must possess.	5.7.2.d.4	6.12.1 and 6.12.2	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.30	CTS 6.8.2 states, "Each new procedure of 6.8.1 above, except 6.8.1.d, 6.8.1.e, and 6.8.1.f shall be reviewed and approved by the SNSOC prior to implementation as set forth in administrative procedures. Procedures of 6.8.1.d, 6.8.1.e, and 6.8.1.f shall be reviewed and approved as set forth in the facility's Security Plan, Emergency Plan, and section 6.5.1.6.m of the Technical Specifications, respectively." CTS 6.8.1.d is Security Program implementation. CTS 6.8.1.e is Emergency Plan implementation. CTS 6.8.1.f is Fire Protection Program Implementation. CTS 6.8.3 states, "Procedure changes that require a safety evaluation shall also be reviewed and approved by SNSOC. All other changes shall be independently reviewed and approved as programmatically discussed in the Updated Final Safety Analysis Report." ITS 5.0 does not include statements like those in CTS 6.8.2 and 6.8.3 regarding review and approval of procedures of CTS 6.8.1.d, 6.8.1.e, 6.8.1.f, and review and approval of changes as described in the UFSAR. This changes the CTS by not specifying how these procedures are reviewed and approved.	None	6.8.2 and 6.8.3	Note 1

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

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Table L – Less Restrictive Changes  
ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.31	CTS 6.8.4.e.5 states that the radioactive effluent control program shall include "Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days." ITS 5.5.4.e states that the radioactive effluent control program shall include "Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology and parameters in the ODCM at least every 31 days." This changes the CTS by not requiring that a projection of the dose contribution for the current calendar quarter and the current calendar year be performed every 31 days.	5.5.4.e	6.8.4.e.5	Note 1
5.0 L.32	CTS 1.22 describes the Process Control Program (PCP). CTS 6.14 (Unit 1) and CTS 6.13 (Unit 2) specifies the change control for the PCP. CTS 6.8.1.g requires written procedures be established, implemented, and maintained to cover PCP implementation. The ITS does not specify requirements for the PCP. This changes the CTS by removing the requirements associated with the contents and maintenance of the PCP.	None	6.14 (Unit 1) and 6.13 (Unit 2)	Note 1
5.0 L.33	CTS 4.7.7.2.c states that the relative humidity at which the laboratory test samples of the charcoal adsorber are tested is 95%. ITS 5.5.10.c states that the relative humidity at which the laboratory test samples of the charcoal adsorber are tested is 70%. This changes the CTS by relaxing the criteria for the test of the charcoal adsorber to a 70% humidity level instead of 95%.	5.5.10.c	4.7.7.2.c	6

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

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ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.34	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." This changes the CTS by allowing personnel to be exempt from the RWP issuance requirement for any duties, not just for radiation protection. Changing the term "Health Physics" to "radiation protection" is addressed by DOC L.11. For Unit 1, allowing personnel not qualified in radiation protection procedures, but escorted by such qualified individuals, to use the exemption from the requirement for an RWP or equivalent while performing their assigned duties is addressed by DOC L.17.	5.7.1.c	6.12 footnote "*"	Note 1

- Change Category:
- 1 - Relaxation of LCO Requirements
  - 2 - Relaxation of Applicability
  - 3 - Relaxation of Completion Time
  - 4 - Relaxation of Required Action
  - 5 - Deletion of Surveillance Requirement
  - 6 - Relaxation Of Surveillance Requirement Acceptance Criteria
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ITS Section 5.0 – Administrative Controls

DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.0 L.35	CTS 6.8.4.a states that the program addressing leakage from portions of systems outside containment shall include, “(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.” ITS 5.5.2, Primary Coolant Sources Outside Containment, states that the program shall include, “b. Integrated leak test requirements for each system at least once per 18 months. The provisions of SR 3.0.2 are applicable.” This changes the CTS by changing the description of the frequency for the integrated leak test requirements to 18 months, and allowing the test to be performed within 1.25 times the 18 month interval. This interval could be longer or shorter than the “refueling interval” frequency.	5.5.2	6.8.4.a	7
5.0 L.36	CTS 4.4.10.1.2 states, “In addition to the requirements of Specification 4.0.5, at least one third of the main member to main member welds, joining A572 material, in the steam generator supports, shall be visually examined during each 40 month inspection interval.” The ITS does not contain this requirement. This changes the CTS by eliminating the Technical Specifications requirement for visual inspection of the steam generator supports.	N/A	4.4.10.1.2	5

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

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