

ATTACHMENT 5

Table R - Relocated Specifications and Removed Details

Table R – Relocated Specifications and Removed Details
ITS Section 1.0 – Use and Application

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
1.0 LA.1	Table 1.1	CTS Section 1.0, Table 1.1, "OPERATIONAL MODES," states that MODE 6 is restricted to reactivity conditions with $K_{eff} \leq 0.95$. ITS Section 1.1, Table 1.1-1, "MODES," does not contain that restriction.	ITS 3.9.1 Bases	ITS 5.5.13, Technical Specification Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 2.0 – Safety Limits

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
2.0 I.A.1	2.1.1 and Figure 2.1-1	CTS 2.1.1 requires that the combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature not exceed the limits in CTS Figure 2.1-1. ITS 2.1.1 states that the combination of THERMAL POWER, RCS highest loop average temperature, and pressurizer pressure shall not exceed the limits specified in the COLR and provides specific limits on DNBR and peak fuel centerline temperature. This changes the CTS by relocating cycle-specific parameter limits to the COLR. The limiting Safety Limit parameters are retained in the SL.	COLR	ITS 5.6.5, Core Operating Limits Report	5

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
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Table R – Relocated Specifications and Removed Details
ITS Section 3.0 – LCO and SR Applicability

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
None	N/A	N/A	N/A	N/A	N/A

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
- 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
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Table R – Relocated Specifications and Removed Details
ITS Section 3.1 – Reactivity Control Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.1.1 LA.1	3.1.1.1, 3.1.1.2, 4.1.1.1.1, and 3.1.1.2	CTS 3.1.1.1 states that the SHUTDOWN MARGIN shall be $\geq 1.77\% \Delta k/k$. CTS 3.1.1.2 states that the SHUTDOWN MARGIN shall be $\geq 1.77\% \Delta k/k$. The specific value of $1.77\% \Delta k/k$ also appears in the CTS 3.1.1.1 and CTS 3.1.1.2 Action, and in Surveillance 4.1.1.1.1 and 4.1.1.2. ITS 3.1.1 states that SHUTDOWN MARGIN shall be within the limits provided in the COLR. The Actions and Surveillance Requirements of ITS 3.1.1 also reference SDM values located in the COLR. This changes the CTS by relocating the SHUTDOWN MARGIN parameter limits to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.1.1 LA.2	4.1.1.1.1.e and 4.1.1.2.b	CTS Surveillances 4.1.1.1.1.e, and 4.1.1.2.b require determination that the SDM is within limit and specifically require the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.1.1 requires determination that SDM is within limit but does not describe the factors that must be considered in the calculation. This information is relocated to the Surveillance Bases. This changes the CTS by removing details on how the SDM calculation is performed from the specifications and placing the information in the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.1.2 LA.1	4.1.1.1.1.2, 4.1.1.1.1.e	CTS Surveillances 4.1.1.1.1.2 requires comparison of the actual and predicted core reactivity balance and specifically requires consideration of at least those factors stated in Specification 4.1.1.1.1.e. CTS 4.1.1.1.1.e requires determination of SDM and require the consideration of the	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

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ITS Section 3.1 – Reactivity Control Systems

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

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ITS Section 3.1 – Reactivity Control Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
		$\Delta k/k$ within 60 minutes. ITS 3.1.8, Action A.3, states this requirement as, "Perform SR 3.1.1.1" within 1 hour. ITS 3.1.1.1 requires verification that the SHUTDOWN MARGIN is within the limit provided in the COLR. This changes the CTS by moving the SHUTDOWN MARGIN value to the COLR.			
3.1.8 LA.2	3.1.1.3.2	Unit 1 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 1-CH-217 or b. 1-CH-220, 1 CH-241, FCV 1114B and FCV-1113B." Unit 2 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 2-CH-140 or b. 2-CH-160, 2 CH-156, FCV 2114B and FCV-2113B." ITS 3.1.8 states, "Each valve used to isolate primary grade water flow path shall be secured in the closed position." ITS 3.1.8 LCO Note states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." This changes the CTS by relocating the list of primary grade water flow path isolation valves to the ITS Bases. The other changes in CTS 3.1.1.3.2 are discussed in DOC A.2.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.1.9 None	N/A	N/A	N/A	N/A	N/A
CTS 3.1.1.3.1 R.1	3.1.1.3.1	CTS 3.1.1.3.1 requires a minimum reactor coolant system flow of 3000 gpm in all MODES. Various accident analyses assume adequate reactor coolant flow for heat removal and boron mixing. However, a specific flow rate is not assumed as an initial condition of any design basis accident or transient	Technical Requirements Manual	10 CFR 50.59	N/A

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ITS Section 3.1 – Reactivity Control Systems

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

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ITS Section 3.1 – Reactivity Control Systems**

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

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		Technical Requirements Manual.			
CTS 3.1.2.3 R.1	3.1.2.3	CTS 3.1.2.3 provides requirements on the charging pumps during shutdown when used as part of the boration system. The charging pumps in the boration system are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The charging pumps in the boration system are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. In the case of the boron dilution accident, the accident is addressed by preventing its occurrence or by terminating the event before the required shutdown margin is lost, not by boration. OPERABILITY of the charging pumps is required as part of the Emergency Core Cooling System, which is addressed in other specifications. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
CTS 3.1.2.4 R.1	3.1.2.4	CTS 3.1.2.4 provides requirements on the charging pumps during operation when used as part of the boration system. The charging pumps in the boration system are part of the Chemical and Volume Control System (CVCS) and provide the means to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin. The charging pumps in the boration system are not assumed to be OPERABLE to mitigate the consequences of a design basis accident or transient. The Emergency Core Cooling System (ECCS) is and Refueling Water Storage Tank are credited in the accident analyses. In the case of the boron	Technical Requirements Manual	10 CFR 50.59	N/A

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ITS Section 3.1 – Reactivity Control Systems

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

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- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
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**Table R – Relocated Specifications and Removed Details
ITS Section 3.1 – Reactivity Control Systems**

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

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
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Table R – Relocated Specifications and Removed Details
ITS Section 3.1 – Reactivity Control Systems

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

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
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**Table R – Relocated Specifications and Removed Details
ITS Section 3.2 – Power Distribution Limits**

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

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Table R – Relocated Specifications and Removed Details
ITS Section 3.2 – Power Distribution Limits

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

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ITS Section 3.2 – Power Distribution Limits

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		by relocating the amount by which $F_Q^M(Z)$ must be increased to the COLR.			
3.2.2 LA.1	3.2.3	CTS 3.2.3 states that $F_{\Delta H}^N$ shall be limited by an equation, which is contained in the LCO. All of the parameters in the CTS equation are specified in the CORE OPERATING LIMITS REPORT (COLR). ITS LCO 3.2.2 states, " $F_{\Delta H}^N$ shall be within the limits specified in the COLR." This changes the CTS by relocating the equation to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.2.3 None	N/A	N/A	N/A	N/A	N/A
3.2.4 LA.1	4.2.4.2	CTS Surveillance 4.2.4.2 states that the QPTR shall be determined to be within limit when above 75 % RTP with one Power Range Channel inoperable by using the movable incore detector to confirm that the normalized symmetric power distribution, obtained from 2 sets of 4 symmetric thimble locations or a full-core flux map, is consistent with the indicated QPTR at least once per 12 hours. ITS SR 3.2.4.2 states, "Verify QPTR is within limit using the movable incore detectors." ITS SR 3.2.4.2 is modified by a Note which states, "Not required to be performed until 12 hours after input from one or more Power Range neutron Flux channels are inoperable with THERMAL POWER > 75% RTP." This changes the CTS by relocating the details of how the movable incore detector system is used to determine QPTR by moving the phrase "the normalized symmetric power distribution, obtained from 2 sets of 4 symmetric thimble locations or a full-core flux map" to the Bases of the Surveillance.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

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

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

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.4	Table 4.3-1	CTS Table 4.3-1 contains surveillance requirements with Notes which provide information on the undervoltage and shunt trip circuits testing of the Reactor Trip Breakers (RTBs) and for the RTB bypass breakers in testing the automatic undervoltage trip during CHANNEL FUNCTIONAL TEST. The descriptive information to be moved is: CTS Note 8 “. . . shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip circuit(s).” CTS Note 10 “Automatic undervoltage trip.” CTS Note 11 “. . . shall independently verify the OPERABILITY of the undervoltage and shunt trip attachment of the Reactor Trip Breaker.” This information is contained in the Bases sections for SR 3.3.1.4 and SR 3.3.1.14. ITS retains the necessary SRs for the RTB and bypass RTB to be OPERABLE. This changes the CTS by moving the descriptive information from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.1 LA.5	Table 2.2-1	CTS Table 2.2-1 for the Limiting Safety System Settings specifies the formulas for Overtemperature and Overpower ΔT functions. ITS 3.3.1 in Table 3.3.1 – 1 lists the formulas for the Overtemperature and Overpower ΔT functions with a reference in each that the specific variables are contained in the Core Operating Limits Report (COLR). This changes the CTS by relocating specific parameters for the Overtemperature and Overpower ΔT functions from the Technical Specifications to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.6	Table 4.3-1 NOTE 12	CTS 3.3.1.1 Surveillance Requirement in Table 4.3-1 for the Intermediate Range channels requires a CHANNEL CHECK on a refueling basis, and shown by the designation of R ⁽¹²⁾ . Note 12 states, in part, "verification that the Permissives P-6 and P-10 are in their required state for existing plant conditions by observation of the permissive annunciator window." The requirement of verification for P-6 and P-10 is retained in ITS SR 3.3.1.8. This changes the CTS by moving the requirement of "observation of the permissive annunciator window," from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.7	2.2.1 Action	CTS 2.2.1 Action states, "with the RTS instrumentation setpoint less conservative than the Allowable Value, the instrumentation channel must be declared inoperable." With the channels inoperable, the applicable Action of ITS 3.3.1.1 shall be entered, and the channel's trip setpoint shall be adjusted to be consistent with the Trip Setpoint value to return the instrument to OPERABLE status. The information provides no specific requirement for each function, but only describes the mechanics of how to adjust the channel to provide the required reactor protection. This changes the CTS by moving the information relating to the Trip Setpoint from the TS to the ITS 3.3.1 Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2,3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.8	Table 2.2-1 footnote	CTS 2.2.1 in Table 2.2-1 provides in a footnote for Loss of Flow function, that the design flow per loop is one-third of the minimum setpoint allowable value RCS total flow rate requirement. The minimum flow rate requirement is stated in CTS Table 3.2-1. The CTS Allowable Value for Loss of Flow is stated in % of design flow per loop. ITS 3.3.1 does not include this information on design flow rate. This changes the CTS by moving the design information from the TS to the COLR, and using the indicated flow rate for the Allowable Value in ITS 3.3.1.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.3.1 LA.9	Table 2.2-1 Note 2	CTS Table 2.2-1 Note 2 provides the calculation for the Overpower ΔT setpoint, Functional Unit 8. This states that the function generated by the rate lag controller for T_{ave} dynamic compensation is given by the formula for τ_3 ($\tau_3 = S/1 + \tau_1 S$). Also specified is the time constant utilized in the rate lag controller for T_{ave} . ITS 3.3.1 Function 7, the Overpower ΔT formula does not include this information. This changes the CTS by moving the OPAT design information from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.1 LA.10	Table 2.2-1	CTS requirements stated in Table 2.2-1 for functions 13 and 14 describes the span of the instrument used to measure steam generator level to provide the trip setpoint and allowable value. ITS Table 3.3.1 does not include this information. This changes the CTS by moving the information for the function from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.11	Tables 2.2-1 and 3.3-1	The CTS lists in Tables 2.2-1 and 3.3-1 Allowable Values and Trip Setpoints. ITS 3.3.1 does not specify the Trip Setpoints. This changes the CTS by moving the Trip Setpoint from the TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.12	Table 4.3-1 NOTE 9	CTS surveillance requirement listed in Table 4.3-1 for the reactor bypass breaker states a Frequency of "M (9)." This requires the monthly testing of the bypass breaker in conjunction the RTS testing. Note 9 states, "Local manual shunt trip the reactor trip bypass breaker immediately after placing the bypass breaker into service, but prior to commencing reactor trip system testing or reactor trip breaker maintenance." ITS 3.3.1.4 is required to be performed on the RTB bypass breaker every 31 days on a STAGGERED TEST BASIS. This test would be required when the associated train of RTS is tested or that train RTB requires maintenance. This changes the CTS by moving the note explaining when to conduct a local manual shunt trip test from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.13	Table 4.3-1 Note 13	CTS Table 4.3-1 states in Note 13 to the Intermediate Range Surveillance Requirements that the detector plateau curves shall be obtained and evaluated on an R (refueling) Frequency. ITS Table 3.3.1-1 states Function 4 Intermediate Range that SR 3.3.1.11 is required. This changes the CTS by moving the requirement for performing detector plateau curves from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.1 LA.14	Table 2.2-1	CTS Table 2.2-1 states the Allowable Value for Function 11 Pressurizer Water Level – High is "93 % of instrument span." ITS Table 3.3.1-1 lists the Allowable Value for Function 9 Pressurizer Water Level – High is "93%." This changes the CTS by moving the design portion of the requirement "of instrument span," from the TS to the UFSAR.	UFSAR	10 CFR 50.59	1

Change Category:

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

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

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

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.1 LA.17	Table 2.2-1 Note 1	CTS Table 2.2-1 Functional Unit 7 states the requirement for the Overtemperature (OT) ΔT as Note 1. The Allowable Value for the function is calculated with the application of Note 3 to Note 1. A portion of Note 1 states that the gains set for the equation are selected based on measured instrument response obtained during plant startup testing. ITS Table 3.3.1-1 Function 6 requires the OT ΔT Allowable Value to be calculated via the formula stated in ITS Note 1. Note 1 in the ITS combines the CTS Notes 1 and 3 with modifications. ITS Note 1 does not contain the requirement "with gains to be selected based on measured instrument response during plant startup tests . . ." This changes the CTS by moving the information of the gain selection from the TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.2 LA.1	LCO 3.3.2.1 and Action a	CTS LCO 3.3.2.1 and Action a contain information about the ESFAS channels and interlocks setpoint requirements. The LCO states the setpoint will be set consistent with the Trip Setpoints listed in Table 3.3-4. Action a requires the setpoint to be set more conservatively than the value listed in the Allowable Value column of the same table in order for the function to be considered OPERABLE. ITS 3.3.2 does not contain this information. DOC LA.8 describes the relocation of the setpoint values to the Technical Requirements Manual (TRM). This changes the CTS by moving the information about determining trip setpoints consistent with the setpoint methodology from the TS to the TRM..	Technical Requirements Manual	10 CFR 50.59	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.2 LA.2	Table 4.3-2 NOTE (2)	CTS Table 4.3-2 specifies a requirement to perform a CHANNEL FUNCTIONAL TEST for the automatic actuation logic on various ESF functions on a monthly basis. The frequency (M) is modified by notation (2) which states, "Each train or logic channel shall be functionally tested at least every other 31 days up to and including input coil continuity testing to the ESF slave relays." ITS SRs 3.3.2.2 and 3.3.2.3 require the performance of the ACTUATION LOGIC TEST and the MASTER RELAY TEST every 31 days on a STAGGERED TEST BASIS. This changes the CTS by moving the requirement that the testing include input coil continuity testing to the ESF slave relays from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.3	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4, item 6.c, for the Allowable Values requirement contains information relating to the Steam Generator (SG) Water Level – Low Low trip. The requirement states that the Allowable Value is associated with the narrow range instrumentation span for each SG. ITS Table 3.3.2-1 (item 6.c) lists the requirements for the SG Water Level – Low Low Allowable Value but does not contain the information about the narrow range instrumentation span. This changes the CTS by moving the information about the narrow range instrumentation span from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.4	Table 3.3-3	CTS LCO 3.3.2.1 in Table 3.3-3 for the ESFAS interlocks P-11 and P-12 contains information in the Condition and Function sections which describes how the interlocks function. ITS Table 3.3.2-1 lists the functions and the necessary requirements to ensure OPERABILITY. This changes the CTS by moving the description about how the interlocks function from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.2 LA.5	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4 for the ESFAS instrumentation trip setpoints contains information describing the bus that is monitored to detect a station blackout. ITS Table 3.3.2-1 does not contain this information. This changes the CTS by moving the information describing the bus that is monitored to detect a station blackout from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.2 LA.6	Table 4.3-2 Note 3	Note 3 of CTS 3.3.2.1 Table 4.3-2 for the ESFAS containment pressure instrumentation surveillance requirement states that the CHANNEL FUNCTIONAL TEST shall include exercising the transmitter by applying either a vacuum or pressure to the appropriate side of the transmitter. ITS Table 3.3.2-1 for the testing of Containment pressure requires SR 3.3.2.4 to be performed. This changes the CTS by moving the information on how to conduct the SR from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.2 LA.7	Table 3.3-4	CTS LCO 3.3.2.1 in Table 3.3-4 item 5.a for the Allowable Value requirement contains information relating to the Steam Generator (SG) Water Level – High High trip. This states that the Allowable Values are associated with the narrow range instrumentation span for each SG. ITS Table 3.3.2-1 (item 5.a) lists the requirements for the SG Water Level – High High Allowable Values but does not contain the information about the narrow range instrumentation span. This changes the CTS by moving the information about the narrow range instrumentation span from the TS to the ITS Bases	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.2 LA.8	Table 3.3 – 3	CTS requirement listed in Table 3.3 – 3, for each ESFAS interlock function, an Allowable Value and a Setpoint column. ITS Table 3.3.2-1 includes only an Allowable Value column. This changes the CTS by moving the pressure setpoint setting from the TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.2 LA.9	4.3.2.1.2	Not used.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.2 LA.10	Table 3.3-3 Action 22	CTS Action 22 for Table 3.3-3 requires for applicable instrumentation channels that, "With less than the Minimum Channels OPERABLE, within one hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition." ITS 3.3.2 in Table 3.3.2-1 for Action J requires, "One or more channels inoperable, verify interlock is in required state for existing unit condition within one hour." The allowance provided by "determine by observation of the associated permissive annunciator window(s)" is not included in the ITS. This changes the CTS by moving the information for how to conduct the required testing from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

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

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

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.3 LA.2	4.6.4.1	CTS SR 4.6.4.1 states each hydrogen analyzer shall be demonstrated OPERABLE by performing a CHANNEL CALIBRATION using a sample gas containing a specified gas concentration for hydrogen mixed with nitrogen. ITS SR 3.3.3.2 requires the hydrogen analyzers have a CHANNEL CALIBRATION. This change moves the CTS sample gas requirements to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.3 LA.3	LCO 3.6.4.1	CTS LCO 3.6.4.1 states two independent containment hydrogen analyzers (shared with the other unit) shall be OPERABLE. ITS 3.3.3 PAM Instrumentation requires two channels of hydrogen analyzers to be OPERABLE. This change moves CTS information regarding the hydrogen analyzer being shared between units from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.3 LA.4	Table 3.3-6	CTS Table 3.3-6 Radiation Monitoring Instrumentation lists the alarm/trip setpoint and measurement range for the High Range Area Monitors. ITS 3.3.3 PAM Instrumentation requires two channels of High Range Area monitors but does not state the measuring range or alarm/trip setpoint. This change moves the measurement range and alarm/trip setpoint from the TS to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	1

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.4 LA.1	Table 3.3-9	CTS 3.3.3.5 LCO states that the auxiliary shutdown monitoring instrumentation channels in Table 3.3-9 shall be OPERABLE with readouts displayed external to the control room. CTS requirement in Table 3.3-9 lists the measuring range for each required channel and the location of the auxiliary shutdown panel where the instrumentation channel is remotely displayed. ITS LCO 3.3.4 states that the Remote Shutdown Instrumentation Functions shall be OPERABLE. This changes the CTS by moving the requirement for readouts displayed external to the control room, the location of the remote readouts (auxiliary shutdown panel) and the instrument channel ranges from the TS to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.4 LA.2	Table 3.3-9, Table 4.3-6	CTS 3.3.3.5 states that the auxiliary shutdown monitoring instrumentation in Table 3.3-9 shall be OPERABLE. CTS Table 4.3-6 lists the Surveillance Requirements for the functions in Table 3.3-9. ITS LCO 3.3.4 states that the Remote Shutdown Instrumentation Functions shall be OPERABLE. This changes the CTS by moving the list of monitoring equipment Tables 3.3-9 and 4.3-6 from the TS to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.3.5 LA.1	3.3.2.1 Action a	CTS 3.3.2.1 Action a requires that with an ESFAS instrumentation channel trip setpoint found less conservative than the value shown in the Allowable Values column of Table 3.3-4, the channel be declared inoperable and Action a be entered. ITS 3.3.5 LCO requires three channels per function to be OPERABLE and Action A requires an inoperable channel to be placed in trip within 72 hours. This changes the CTS by moving the discussion of the relationship between the Allowable Value and OPERABILITY from the Technical Specification to the Background section of the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.5 LA.2	Table 3.3-4, 3.3.2.1 LCO, Action a	CTS Table 3.3-4 functional unit 7, Loss of Power, lists the Trip Setpoints for the undervoltage and degraded voltage on the 4160-volt emergency bus. CTS 3.3.2.1 LCO and Action a state that the instrumentation channels' trip setpoints will be set, "consistent with the Trip Setpoint values." ITS 3.3.5 LCO and Actions do not contain these requirements. This changes the CTS by moving the Trip Setpoints and the trip setpoint adjustment, "consistent with the Trip Setpoint value," and details for establishing process settings from the Technical Specifications to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.3.5 LA.3	Table 4.3-2 NOTE (5)	CTS Table 4.3-2 requires a quarterly (Q) CHANNEL FUNCTIONAL TEST (CFT) of the Loss of Power function. The Surveillance Requirement is modified by Note (5), which states, "Each train or logic channel shall be functionally tested up to and including input coil continuity testing to the ESF relays." ITS SR 3.3.5.1 requires a TADOT to be performed every 92 days. The ITS does not contain the requirements of Note 5. This changes the CTS by moving the components tested by TADOT described in Note 5 to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.3.5 LA.4	4.3.2.1.2	Not used.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.5 LA.5	Table 3.3-3	CTS Table 3.3-3 for Engineered Safety Feature Actuation System (ESFAS) instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.2-1 states the channel requirement for each ESFAS function as, "REQUIRED CHANNELS." This changes the CTS by stating all of the channel requirements for each function as the required channels and moving the information of the number of channels to trip and the minimum channels needed to maintain the function OPERABLE to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.3.1 R.1	CTS 3.3.3.1	CTS 3.3.3.1 states the radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits. Portions of the Radiation Monitoring Instrumentation specification, as shown in the CTS markup, are addressed in ITS 3.4.15, RCS Leakage Detection Instrumentation, and ITS 3.3.3, Post Accident Monitoring (PAM) Instrumentation. Those portions are not addressed in this change. The Radiation Monitoring Instrumentation monitors radiation levels in selected plant locations and indicates abnormal or unusually high radiation levels. The radiation monitors are not assumed in the accident analyses to provide signals to prevent initiation of a DBA or transient or to mitigate a DBA or transient. The area radiation monitors do not meet the criteria for retention in the TS; therefore, it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.3.2 R.1	CTS 3.3.3.2	CTS 3.3.3.2 provides requirements on the Movable Incore Detector Instrumentation when required to monitor the flux distribution within the core. The Movable Incore Detector System is used for periodic surveillance of the power distribution, and for calibration of the excore detectors. The Movable Incore Detector Instrumentation do not meet the criteria for retention in the ITS; therefore, it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.3 R.1	CTS 3.3.3.3	CTS 3.3.3.3 for Unit 1 states the Seismic Monitoring Instrumentation shown in Table 3.3-7 shall be OPERABLE. The Seismic Monitoring Instrumentation is used to record data for use in evaluating the effect of a seismic event. The Seismic Monitoring Instrumentation is not used to mitigate a DBA or transient. The Seismic Monitoring Instrumentation do not meet the criteria for retention in the ITS; therefore, it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.4 R.1	CTS 3.3.3.4	CTS 3.3.3.4 for Unit 1 states the Meteorological Monitoring Instrumentation shown in Tables 3.3-8 and 4.3-5 shall be OPERABLE. The Meteorological Monitoring Instrumentation is used to record meteorological data for use in evaluating the effect of an accidental radioactive release from the plant. The Meteorological Monitoring Instrumentation is not used to mitigate a DBA or transient. The Meteorological Monitoring Instrumentation do not meet the criteria for retention in the ITS; therefore, it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.3.3.9 R.1	CTS 3.3.3.9	Unit 1 CTS 3.3.3.9 requires the OPERABILITY of the loose parts detection instrumentation which can detect loose metallic parts in the Reactor Coolant System in order to avoid damage to the Reactor Coolant System components. The Unit 2 Technical Specifications do not contain this Specification. The loose parts detection instrumentation do not meet the criteria for retention in the ITS; therefore, it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
3.3.3.11 R.1	CTS 3.3.3.11	CTS 3.3.3.11 requires the Explosive Gas Monitoring Instrumentation be OPERABLE. The Explosive Gas Monitoring Instrumentation is used to ensure that the oxygen limits of the Waste Gas Holdup System are not exceeded. The oxygen concentration limit in the Waste Gas Holdup Tank ensures that the concentration of potentially explosive gas mixtures in the Waste Gas Holdup System is maintained below the flammability limits. This instrumentation is not credited in preventing or mitigating any DBA or transient as the safety analysis concerning the Waste Gas Holdup System assumes a storage tank rupture with no mitigation. The Explosive Gas Monitoring Instrumentation does not meet the criteria for retention in the ITS; therefore, it will be relocated to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	N/A

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.1 LA.1	3.2.5	CTS 3.2.5 places limits on RCS T_{avg} , pressurizer pressure, and RCS total flow rate. ITS 3.4.1 states that the limits on RCS T_{avg} , pressurizer pressure, and RCS total flow rate shall not exceed the limits specified in the COLR or the minimum RCS flow rate specified in the LCO. This changes the CTS by relocating the cycle specific values of RCS T_{avg} , pressurizer pressure, and RCS total flow rate to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.4.2 None	N/A	N/A	N/A	N/A	N/A
3.4.3 LA.1	3.4.9.1	CTS 3.4.9.1 states that the RCS (except the pressurizer) temperature and pressure shall be limited. The LCO also contains limits on RCS heatup and cooldown rates. ITS 3.4.3 states that the RCS pressure, temperature, and RCS heatup and cooldown rates shall be maintained within limits. This changes the CTS by moving the exclusion of the pressurizer from the LCO to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

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

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

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.5 LA.2	4.4.1.2.2	CTS Surveillance 4.4.1.2.2 states that at least one required reactor coolant loop shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.5.1 states that the required reactor coolant loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the reactor coolant loops are circulating reactor coolant to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.6 LA.1	3.4.1.3.a	CTS 3.4.1.3 states that two coolant loops consisting of any combination of RCS loops and RHR loops shall be OPERABLE and contains a description of what constitutes an OPERABLE Reactor Coolant loop and Residual Heat Removal loop. ITS 3.4.5 requires two loops consisting of any combination of RCS loops and RHR loops to be OPERABLE. This changes the CTS by moving the details of what constitutes an OPERABLE loop to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.4.6 LA.2	4.4.1.3.4	CTS Surveillance 4.4.1.3.4 states that at least one Reactor Coolant pump or RHR loop shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.6.1 states that an RHR or RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the coolant loop is circulating reactor coolant to the Bases. Other changes to CTS Surveillance 4.4.1.3.4 are described in LA.3.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.6 LA.3	4.4.1.3.4.b	CTS Surveillance 4.4.1.3.4 states that at least once per 12 hours it must be verified that at least one coolant loop is in operation and circulating reactor coolant by verifying at least one RCP is in operation or at least one RHR loop is in operation. It goes on to provide minimum RHR flow rates dependent on RCS temperature or time since entry into MODE 3. ITS Surveillance 3.4.6.1 requires verification that one RHR or RCS loop is in operation every 12 hours. This changes the CTS by moving the RHR minimum flow requirements to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	3
3.4.7 LA.1	4.4.1.3.4	CTS Surveillance 4.4.1.3.4 states that at least one Reactor Coolant pump or RHR loop shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.7.1 states that an RHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the Bases. Other related changes are described in LA.3 and L.1.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.7 LA.2	4.4.1.3.4.b	CTS Surveillance 4.4.1.3.4.b states that at least once per 12 hours it must be verified that one RHR loop is in operation. It goes on to provide minimum RHR flow rates dependent on RCS temperature or time since entry into MODE 3. ITS Surveillance 3.4.7.1 requires verification that one RHR loop is in operation every 12 hours. This changes the CTS by moving the RHR minimum flow requirements to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.8 LA.1	4.4.1.3.4	CTS Surveillance 4.4.1.3.4 states that at least one Reactor Coolant pump or RHR loop shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.8.1 states that a required RHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the Bases. Other related changes are described in LA.2 and A.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.8 LA.2	4.4.1.3.4.b	CTS Surveillance 4.4.1.3.4.b states that at least once per 12 hours it must be verified that one RHR loop is in operation. It goes on to provide minimum RHR flow rates dependent on RCS temperature or time since entry into MODE 3. ITS Surveillance 3.4.8.1 requires verification that one RHR loop is in operation every 12 hours. This changes the CTS by moving the RHR minimum flow requirements to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	3
3.4.9 None	N/A	N/A	N/A	N/A	N/A
3.4.10 LA.1	3.4.3.1 and 3.4.2	CTS LCO 3.4.3.1 and LCO 3.4.2 are modified by a note that states that the pressurizer lift setting pressure shall correspond to ambient conditions of the valve at nominal temperature and pressure. The ITS does not contain this information and it is moved to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.11 LA.1	4.4.3.2.1.b.1	CTS 4.4.3.2.1.b.1 states that at least once per 18 months each PORV must be operated through one complete cycle of full travel during MODES 3 and 4. ITS SR 3.4.11.3 states that a complete cycle of each PORV must be made at a Frequency of 18 months. This changes the CTS by relocating the requirement to perform the testing in MODES 3 and 4 to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.12 LA.1	3.4.9.3 Action d	CTS 3.4.9.3, Action d, states that when the RCS is vented, the vent pathway must be verified at least once per 31 days when the pathway is provided by a valve(s) that is locked, sealed, or otherwise secured in the open position; otherwise, the vent pathway must be verified every 12 hours. ITS SR 3.4.12.4 states that an RCS vent must be verified open every 12 hours for unlocked open vent valve(s) and every 31 days for other vent paths. This changes the CTS by moving the detail that a vent valve may be considered locked open if it is sealed or otherwise secured in position to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2
3.4.13 LA.1	3.4.5	CTS 3.4.5 states, "Each steam generator in a non-isolated reactor coolant loop shall be OPERABLE." The ITS does not contain a similar requirement. However, the Bases for the RCS loop specifications which require one or more steam generators, Specifications 3.4.4, 3.4.5, 3.4.6, and 3.4.7, define an OPERABLE steam generator as one which is OPERABLE in accordance with the Steam Generator Tube Surveillance Program. This changes the CTS by moving the definition of an OPERABLE steam generator to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.4.14 LA.1	3.4.6.2.f and Table 3.4.1	CTS 3.4.6.2 contains a list of the RCS PIVs and their associated leakage limits. ITS 3.4.14 does not contain a list of the RCS PIVs and the leakage limits are located in SR 3.4.14.1. This changes the CTS by relocating the list of PIVs to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.4.14 LA.2	4.4.6.2.2	Unit 1 CTS 4.4.6.2.2 is modified by a footnote that states that, to satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria. ITS SR 3.4.14.1 does not contain this information. This changes the CTS by moving this information on how the Surveillance may be performed to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.4.15 LA.1	Table 3.3-6	CTS 3.3.3.1 Table 3.3-6 includes Measurement Ranges for the RCS Leakage Detection instrumentation. ITS does not include these details. This changes the CTS by moving these details to the UFSAR.	UFSAR	10 CFR 50.59	1
3.4.16 None	N/A	N/A	N/A	N/A	N/A
3.4.17 None	N/A	N/A	N/A	N/A	N/A
3.4.18 None	N/A	N/A	N/A	N/A	N/A
3.4.19 None	N/A	N/A	N/A	N/A	N/A

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.4.6.3 R.1	3.4.6.3	CTS 3.4.6.3 provides limits on primary to secondary leakage in addition to the limits in CTS 3.4.6.2 and ITS 3.4.13. These additional limits lower the amount of allowed primary to secondary leakage when the reactor is operating above 50% power and were implemented to reduce the probability of a steam generator tube rupture following the Unit 1 steam generator tube rupture event at North Anna Unit 1 on July 15, 1987. The CTS 3.4.6.2 leakage limits were continued to be used in the accident analysis, not the addition limits in CTS 3.4.6.3. The North Anna Units 1 and 2 steam generators have been replaced with models that are not susceptible to the fatigue induced cracks which resulted in the tube rupture. As a result, these additional limits are not needed to lower the probability of a steam generator tube rupture. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.4.6.4 R.1	3.4.6.4	CTS 3.4.6.4 states requirements on primary to secondary leakage detection systems. These leakage detection systems are in addition to those systems required by CTS 3.4.6.1 and ITS 3.4.15 and were installed to monitor the stringent primary to secondary leakage limits in CTS 3.4.6.3. These additional primary to secondary leakage detection systems were added to the Technical Specifications following the Unit 1 steam generator tube rupture (SGTR) event at North Anna Unit 1 on July 15, 1987. Subsequently, the North Anna Units 1 and 2 steam generators have been replaced and steam generator primary to secondary leakage is insignificant. As a result, the requirements in ITS 3.4.15 are sufficient to indicate significant abnormal RCS leakage. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.4.7 R.1	3.4.7	CTS 3.4.7 provides limits on the oxygen, chloride and fluoride content in the RCS to minimize corrosion. Minimizing corrosion of the RCS will reduce the potential for RCS leakage or failure due to stress corrosion, and ultimately ensure the structural integrity of the RCS. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.4.9.2 R.1	3.4.9.2	CTS 3.4.9.2 states that the pressurizer temperature shall be limited to a maximum heatup of 100°F or cooldown of 200°F in any one hour period and a maximum spray water temperature and pressurizer temperature differential of 320°F. The pressurizer temperature limits are placed on the pressurizer to prevent non-ductile failure. The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.4.10.1 R.1	3.4.10.1	CTS 3.4.10.1 provides requirements for the ASME Code Class 1, 2 and 3 components to ensure their structural integrity. These requirements are in addition to the requirements in CTS 4.0.5. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.4.11.1 R.1	3.4.11.1	CTS 3.4.11.1 provides requirements on the reactor vessel head vents. The reactor coolant head vents are provided to exhaust noncondensable gases or steam, which could inhibit core cooling, from the Reactor Coolant System. The reactor vessel head vents are not credited in any UFSAR accident analysis. The reactor vessel head vents are included in the Emergency Operating Procedures for mitigation of beyond design basis accidents. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

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

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.9.1 R.1	3.7.9.1	CTS 3.7.9.1 states that two residual heat removal (RHR) subsystems shall be OPERABLE in MODES 1, 2, and 3. The RHR System is used to remove decay heat from the reactor in MODES 4, 5, and 6. The RHR does not operate in MODES 1, 2 and 3 and must be isolated from the reactor coolant system in those MODES to prevent overpressurization of the RHR components. The RHR System serves no accident mitigation function in any MODE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.9.2 LA.1	4.7.9.2.c.1	CTS Surveillance 4.7.9.2.c.1 requires cycling of each remote or automatically operated valve in the RHR subsystem flowpath through at least one complete cycle of full travel every 18 months. ITS 3.4.6, 3.4.7, and 3.4.8 do not contain this requirement. This changes the CTS by relocating these Surveillances to the TRM.	Technical Requirements Manual	10 CFR 50.59	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.1	None	N/A	N/A	N/A	N/A
3.5.2	LA.1	3.5.2, 4.5.2.e.2	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.5.2	LA.2	4.5.2.g	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	2

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.2 LA.3	4.5.2.f	CTS Surveillance 4.5.2.f specifies that the HHSI pumps and LHSI pumps be tested in accordance with 4.0.5 (the Inservice Test Program) and that a specific developed head (i.e., developed head equals the discharge pressure minus the suction pressure) be met. ITS SR 3.5.2.4 requires the same testing, but the specific limits on developed head for each type of pump are maintained by the Inservice Test Program. This changes the CTS by moving the procedural details for meeting the Surveillance to the IS/IST Program.	IST	ITS 5.5.7, Inservice Testing Program	3
3.5.2 LA.4	4.5.2.c	CTS Surveillance 4.5.2.c requires a visual inspection for loose debris in containment prior to establishing containment integrity and within affected areas of the containment at the completion of each containment entry when containment integrity is established. ITS does not include this requirement. This changes the CTS by moving this requirement to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	3
3.5.2 LA.5	4.5.2.e.1 and 4.5.2.e.2	CTS Surveillance 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of the ECCS components every 18 months during shutdown. ITS SR 3.5.2.5 and SR 3.5.2.6 require this testing every 18 months. This changes CTS by moving the requirement that this testing be performed during shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.5.2 LA.6	4.5.2.e.1 and 4.5.2.e.2	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 do not specify the signal, but only specify an actuation signal. This changes CTS by moving the designated actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems (ECCS)

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.5.3 LA.1	3.5.3	CTS LCO 3.5.3 states that an ECCS subsystem shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. ITS 3.5.3 requires an ECCS train be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.5.4 None	N/A	N/A	N/A	N/A	N/A
3.5.5 None	N/A	N/A	N/A	N/A	N/A
3.5.6 LA.1	3.5.4.1	CTS 3.5.4.1 states that when the boron injection tank is inoperable, the tank must be restored to OPERABLE status within one hour or the reactor must be in HOT STANDBY and borated to a Shutdown Margin (SDM) equivalent to 1.77% $\Delta k/k$ at 200 °F within the next 6 hours. ITS 3.5.6, Actions A and B, contain similar requirements, but the specific value of SDM is relocated to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	3
CTS 3.5.4.2 R.1	3.5.4.2	CTS 3.5.4.2 states, "At least two independent channels of heat tracing shall be OPERABLE for the boron injection tank and for the heat traced portions of the associated flow paths." The ITS will not contain this requirement and it will be relocated to the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.1 LA.1	1.6.2	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:... 1.6.2 All equipment hatches are closed and sealed." 3.6.1 states, "Containment shall be OPERABLE." This changes the CTS by moving the reference to the equipment hatch being closed to the Bases. The change deleting the phrase "and sealed" is addressed by DOC L.1.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	2
3.6.1 LA.2	1.6.1	CTS 1.6 states, "CONTAINMENT INTEGRITY shall exist when:... 1.6.1 All penetrations required to be closed during accident conditions are either: a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1." CTS 1.6.5 states, "The sealing mechanism associated with each penetration (e.g. welds, bellows, or O-rings) is OPERABLE." This changes the CTS by moving the 1.6.1 and 1.6.5 portions of the definition to the 3.6.1 Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	2
3.6.2 LA.1	3.6.1.3.a and b	CTS LCO 3.6.1.3 parts a and b state what constitutes an OPERABLE containment air lock. ITS LCO 3.6.2 does not include this level of detail. Part a of this detail is moved to the Bases of the ITS. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.3 LA.1	4.6.3.1.2	CTS 4.6.3.1.2 states, "Each containment isolation valve shall be demonstrated OPERABLE during COLD SHUTDOWN or REFUELING MODE at least once per 18 months..." by means that include actuation of specified automatic valves and cycling of weight or spring loaded check valves not testable during unit operation. ITS Frequency of SR 3.6.3.5 and SR 3.6.3.6 is 18 months, and does not include the phrase, "...during COLD SHUTDOWN and REFUELING MODE..." This changes the CTS by moving the reference to the 18 month Frequency being based on the need to perform this Surveillance under the conditions that apply during a unit outage to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.3 LA.2	4.6.5.1.1	CTS 4.6.5.1.1 states, "The steam jet air ejector suction line outside isolation valve shall be determined to be in the closed position by visual observation..." ITS SR 3.6.3.1 does not include the reference to visual inspection. This changes the CTS by moving the detail of how the verification is performed to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.3 LA.3	4.6.3.1.2	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 moving the detail concerning which signals are used to conduct the Surveillance Requirement to the Bases. 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. Changes associated with allowing the use of an actual signal for conducting the Surveillance Requirement are addressed by DOC L.12.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.3 LA.4	4.6.1.1.d	CTS 4.6.1.1.d states, "Each time containment integrity is established after vacuum has been broken by pressure testing the butterfly isolation valves in the containment purge lines and the containment vacuum ejector line." ITS SR 3.6.3.4 states, "Perform leakage rate testing for containment purge valves with resilient seals." This changes the CTS by moving the details specifically naming butterfly valves and the containment vacuum air ejector line to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.4 None	N/A	N/A	N/A	N/A	N/A

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.5 LA.1	4.6.1.5.1	CTS 4.6.1.5.1 includes specific locations where containment temperatures are to be measured. ITS SR 3.6.5.1 does not include these details. This changes the CTS by moving the description of how compliance with the Technical Specification LCO is determined to the UFSAR.	UFSAR	10 CFR 50.59	3
3.6.5 LA.2	4.6.5.1	CTS 4.6.5.1 states, "The primary containment average air temperature shall be the weighted average of at least the minimum number of temperatures..." ITS SR 3.6.5.1 states, "Verify containment average air temperature is within limits." This changes the CTS by moving the requirement to take a weighted average of temperatures to perform the Surveillance Requirement to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.1	LCO 3.6.2.1	CTS LCO 3.6.2.1 states that two independent containment quench spray subsystems shall be OPERABLE. ITS 3.6.6 also requires two quench spray trains (i.e., subsystems) to be OPERABLE. This changes the CTS by moving the detail that the trains must be independent to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.6 LA.2	4.6.2.1.b	CTS SR 4.6.2.1.b states, "Verifying that on recirculation flow, each pump develops a discharge pressure of ≥ 123 psig when tested pursuant to Specification 4.0.5." ITS SR 3.6.6.2 states, "Verify each OS pump's developed head at the flow test point is greater than or equal to the required developed head." This changes the CTS by moving the required developed head limit from the Technical Specifications to the Inservice Test Program. The change to the description of the test being performed using recirculation flow is discussed in LA.5.	Inservice Test Program	ITS 5.5.7, Inservice Testing Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.6 LA.3	4.6.2.1.c.1, 4.6.2.1.c.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 do not specify the name of the signal, but only specify an actuation signal. This changes the CTS by moving the type of actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.4	4.6.2.1.d	CTS Surveillance 4.6.2.1.d states, "At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed." ITS SR 3.6.6.5 states, "Verify each spray nozzle is unobstructed." This changes the CTS by moving the details of the test to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.6 LA.5	4.6.2.1.b	CTS SR 4.6.2.1.b states, "Verifying that on recirculation flow, each pump develops a discharge pressure of ≥ 123 psig when tested pursuant to Specification 4.0.5." ITS SR 3.6.6.2 states, "Verify each QS pump's developed head at the flow test point is greater than or equal to the required developed head." This changes the CTS by moving the description that the test is performed using recirculation flow to the Bases of the Surveillance. The change moving the required developed head limit from the Technical Specifications is discussed in LA.2.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.1	3.6.2.2	CTS 3.6.2.2 states that two trains of containment RS shall be OPERABLE and contains a description of subsystems that each train consists of. ITS 3.6.7 states that four RS subsystems shall be OPERABLE, but the details of what constitutes an OPERABLE subsystem are moved to the Bases. This changes the CTS by moving the details of what constitutes a subsystem to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.7 LA.2	3.6.2.2.b	CTS LCO 3.6.2.2.b states that one casing cooling tank shared with both trains of RS shall be OPERABLE. ITS 3.6.7 states a casing cooling tank shall be OPERABLE, but the details regarding both trains sharing the tank are moved to the Bases. This changes the CTS by moving the detail that a casing cooling tank is shared by both trains of RS to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.7 LA.3	4.6.2.2.1.c.1	CTS 4.6.2.2.1.c.1 requires each containment RS subsystem and casing cooling subsystem be demonstrated OPERABLE by verifying that the casing cooling pump, and inside and outside RS pumps start automatically after a specified time delay. ITS SR 3.6.7.6 requires verification that the RS System pumps start automatically on an actuation signal, and does not contain the specific delay times. This changes CTS 4.6.2.2.1.c.1 by moving the specific delay times to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.4	4.6.2.2.1.c.1, 4.6.2.2.1.c.2	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 does not specify the signal, but only specifies an actuation signal. This changes CTS by moving the designated actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.7 LA.5	4.6.2.2.1.d	CTS 4.6.2.2.1.d requires each containment RS subsystem and casing cooling subsystem be demonstrated OPERABLE, "At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed." ITS SR 3.6.7.7 states, "Verify each spray nozzle is unobstructed." This changes the CTS by moving the details regarding the test method to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.8 LA.1	4.6.2.3.b.2	CTS Surveillance 4.6.2.3.b.2 requires verification of the concentration of NaOH solution in the chemical addition tank by chemical analysis. ITS SR 3.6.8.3 also requires verification of the NaOH solution concentration but does not specify how that verification is performed. This changes the CTS by moving the method of verification to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.2	4.6.2.3.c	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of the Chemical Addition System automatic valves every 18 months during shutdown. ITS SR 3.6.8.4 requires this testing every 18 months. This changes the CTS by moving the requirement that this testing be performed during shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.3	4.6.2.3.c	CTS Surveillance 4.6.2.3.c requires verification of the automatic actuation of the Chemical Addition System automatic valves on a containment high-high pressure test signal. ITS SR 3.6.8.4 will not specify the name of the signal, but will only specify an actuation signal. This changes the CTS by moving the type of actuation signal to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3
3.6.8 LA.4	4.6.2.3.d	CTS Surveillance 4.6.2.3.d requires verification of flow from the RWST and the chemical addition tank every 5 years using the drain lines in the cross connection between the tanks. ITS SR 3.6.8.5 also requires verification of the flow from each solution's flow path every 5 years. This changes CTS by moving the specific requirement to verify the flow through the drain lines in the cross connection between the respective tanks to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.6.9 LA.1	3.6.4.2	CTS 3.6.4.2 states, "Two separate and independent containment hydrogen recombiner systems," shared with Unit 2 or Unit 1 for the Unit 1 or Unit CTS, respectively, "shall be OPERABLE." ITS 3.6.9 states, "Two hydrogen recombiners shall be OPERABLE." This changes the CTS by moving the detail, "separate and independent," and the reference to the sharing of the systems between units to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	1
3.6.9 LA.2	4.6.4.2.a, 4.6.4.2.b, 4.6.4.2.c, 4.6.4.2.d	CTS 4.6.4.2.a, CTS 4.6.4.2.b, CTS 4.6.4.2.c, and CTS 4.6.4.2.d include detail for performance of a functional test, resistance to ground test, and visual examination. ITS SR 3.6.9.1, ITS SR 3.6.9.2, and ITS SR 3.6.9.3 together require that each of these three tests be performed. This changes CTS by moving the detail of how these tests are performed to the Bases.	Bases	ITS 5.5.13, Technical Specification Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.1 LA.1	3.7.1.1 Table 3.7-2	CTS 3.7.1.1, Table 3.7-2, is modified by a footnote that states, "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. ITS 3.7.1 does not contain this information. This changes the CTS by eliminating details on setting the lift pressure.	UFSAR	10 CFR 50.59	3
3.7.2	None	N/A	N/A	N/A	N/A
3.7.3	None	N/A	N/A	N/A	N/A
3.7.4	None	N/A	N/A	N/A	N/A
3.7.5 LA.1	3.7.1.2	CTS LCO 3.7.1.2 requires three independent AFW pumps and associated flow paths to be OPERABLE. This includes the motor driven AFW pumps powered from separate emergency buses, and the steam turbine driven AFW pump capable of being powered from an OPERABLE steam supply system. ITS LCO 3.7.5 will require "Three AFW trains to be OPERABLE"; it does not include design details or define the components that comprise an OPERABLE AFW train. This changes the CTS by removing description of the AFW system from the Technical Specifications (TS).	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.5 LA.2	4.7.1.2.c	CTS SR 4.7.1.2.c requires the testing of the automatic valves in the AFW flow path and the starting of the AFW pumps during shutdown. ITS SRs 3.7.5.3 and 3.7.5.4 require the testing for the pumps and a valve to ensure OPERABILITY is maintained. This change moves the requirement to perform the testing "during shutdown" from the Technical Specifications (TS).	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.6 LA.1	3.7.1.3	CTS ACTION b states the Condensate Storage Tank (CST) acts as a backup supply to the AFW pumps with a capacity of 300,000 gallons. ITS 3.7.6 requires the CST to be OPERABLE when the Emergency Condensate Storage Tank (ECST) is inoperable. This changes the CTS by deletion of specific tank capacity and restates the functional requirements.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.7 None	N/A	N/A	N/A	N/A	N/A
3.7.8 LA.1	3.7.4.1	CTS 3.7.4.1 states that two service water loops shall be OPERABLE and contains a description of what constitutes an OPERABLE loop. ITS 3.7.8 requires two service water (SW) System loops to be OPERABLE, but does not contain these details. This changes the CTS by moving the detail of what constitutes OPERABLE SW System loops to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.2	4.7.4.1.b	CTS Surveillance 4.7.4.1.b requires the measurement of any movement of the SW pumphouse and wing walls every 6 months. CTS 4.7.4.1.b gathers information used in evaluating compliance with CTS 3.7.12, "Settlement of Class 1 Structures." ITS 3.7.8 does not contain this requirement. This changes the CTS by moving the procedural detail of measuring SW pumphouse and wing wall movement to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.8 LA.3	4.7.4.1.c	CTS 4.7.4.1.c requires verification of the automatic actuation of SW System valves every 18 months during shutdown. ITS SR 3.7.8.2 requires verification of the automatic actuation of SW System valves every 18 months, but not the requirement that this testing be performed during shutdown. This changes the CTS by moving the reference to performing the SR when the plant is shutdown to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.8 LA.4	4.7.4.1.c.1	CTS 4.7.4.1.c.1 requires verification that each automatic valve actuates to its correct position on an actual or simulated safety injection signal. CTS 4.7.4.1.c.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated containment high-high signal. ITS SR 3.7.8.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by moving the name of the actuation signals to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.5	3.7.4.1 Action d	CTS 3.7.4.1 Action d contains a reference to a footnote which describes those activities that are considered service water system upgrades. ITS 3.7.8 does not contain the information in the footnote. This changes the CTS by moving the description of what constitutes service water system upgrades to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.8 LA.6	4.7.4.1.c.1	CTS 4.7.4.1.c.1 requires that each valve servicing safety related equipment actuate to its correct position on an actual or simulated signal. ITS SR 3.7.8.2 does not reference the servicing of safety related equipment. This changes CTS by moving the reference to safety related equipment to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.8 LA.7	4.7.4.1.d	CTS 4.7.4.1.d requires each SW pump to be tested in accordance with Specification 4.0.5. ITS 5.5.8, "Inservice Testing Program," provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. ITS 3.7.8 does not contain the specific Surveillance to test each SW pump in accordance with the Inservice Testing Program. This changes the CTS by removing a detailed listing of the components required to be tested in accordance with the Inservice Testing Program.	IST	ITS 5.5.7, Inservice Testing Program	3
3.7.9 LA.1	4.7.5.2	CTS 4.7.5.2 states data for calculating the leakage from the Service Water Reservoir shall be obtained and recorded at least once per 6 months. ITS 3.7.9 does not contain this requirement. This changes the CTS by moving the requirement to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.7.9 LA.2	3.7.5.1	CTS 3.7.5.1 requires that minimum water level for the ultimate heat sinks be measured to USGS datum, and average water temperature of the Service Water Reservoir be measured at the SW pump outlet. ITS SR 3.7.9.1 and SR 3.7.9.2 require verification of the parameters. This changes the CTS by not specifying the datum for mean sea level, or where the average Service Water Reservoir water temperature is measured.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.10 LA.1	4.7.7.1.a	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 moving the detail of how the surveillance is conducted to the Bases. The change deleting the STAGGERED TEST BASIS reference is addressed in DOC L.1.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.10 LA.2	4.7.7.1.d	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 moving the detail of what is verified by the Surveillance to the Bases. The change adding the, "actual or simulated actuation," phrase is addressed DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.11 None	N/A	N/A	N/A	N/A	N/A

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.12 LA.1	3.7.8.1	The Unit 1 CTS 3.7.8.1 states, "Two safeguards area ventilation systems (SAVS) shall be OPERABLE with: a. one SAVS exhaust fan b. one auxiliary building HEPA filter and charcoal adsorber assembly (shared with Unit 2)." In the Unit 2 CTS, the reference to the other unit states, "(shared with Unit 1)." ITS 3.7.12 states, "Two ECCS PREACS trains shall be OPERABLE." This changes the CTS by moving the details of what the subsystems consist of and the fact that the two units share portions of the system to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.12 LA.2	4.7.8.1.a.1	CTS 4.7.8.1.a.1 states that each SAVS system shall be demonstrated OPERABLE by, "Initiating, from the control room, flow through the auxiliary building HEPA filter and charcoal adsorber assembly and verifying that the SAVS operates for at least 10 hours with the heater on." ITS 3.7.12.2 states, "Actuate each ECCS PREACS train by aligning Safeguards Area exhaust flow and Auxiliary Building Central exhaust system flow through the Auxiliary Building HEPA filter and charcoal adsorber assembly." This changes the CTS by moving the fact that the system is actuated from the control room to the Bases. The changes associated with adding Auxiliary Building Central exhaust system components and flow are addressed by DOC M.1	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.12 LA.3	4.7.8.1.d.2	CTS 4.7.8.1.d.2 requires that part of demonstrating SAVS OPERABILITY is, "Verifying that on a Containment Hi-Hi Test Signal, the system automatically diverts Safeguards Area exhaust flow through the Auxiliary Building HEPA filter and charcoal adsorber assembly." 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." This changes the CTS by moving the detail regarding the specific signal used and flow paths to the Bases. The change adding the option of using an actual signal is addressed in DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.13 LA.1	3.7.7.1	Unit 2 CTS 3.7.7.1 states, "The following control room emergency habitability systems shall be OPERABLE:... b. The bottled air pressurization system*..." CTS 3.7.7.1 "*" states, "Shared with Unit 1." ITS 3.7.13 requires two MCR/ESGR bottled air system trains to be OPERABLE. This changes the CTS by moving the fact that the two units share the bottled air system to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.7.13 LA.2	4.7.7.1	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 moving the detail of what is verified by the Surveillance to the Bases. The change adding the, "actual or simulated actuation," phrase is addressed DOC L.2.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.7.13 LA.3	4.7.7.2	The Unit 1 CTS 4.7.7.2 states, "The bottled air pressurization system shall be demonstrated OPERABLE: a. At least once per 31 days by verifying that the system contains a minimum of 102 bottles of air (shared with unit 2) each pressurized to at least 2300 psig." In the Unit 2 CTS, the reference to the other unit states, "shared with unit 1." ITS SR 3.7.13.3 states, "Verify each required MCR/ESGR bottled air bank is pressurized to ≥ 2300 psig." ITS SR 3.7.13.4 states, "Verify each MCR/ESGR bottled air bank manual valve not locked, sealed, or otherwise secured and required to be open during accident conditions is open." The Frequency is every 31 days. This changes the CTS by moving the detail that the bottles are shared with the other unit and the number of bottles required to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.7.14 None	N/A	N/A	N/A	N/A	N/A
3.7.15 None	N/A	N/A	N/A	N/A	N/A
3.7.16 None	N/A	N/A	N/A	N/A	N/A
3.7.17 None	N/A	N/A	N/A	N/A	N/A
3.7.18 None	N/A	N/A	N/A	N/A	N/A
3.7.19 LA.1	3.7.3.1	CTS LCO 3.7.3.1 states that three CC subsystems, shared with the other unit, shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. Footnote "*" provides further details on what constitutes an operable subsystem. ITS 3.7.19 requires three CC subsystems to be OPERABLE. This changes CTS by moving the details of what constitutes an OPERABLE subsystem, including that the subsystems are shared between the units, to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.1.6 R.1	3.7.1.6	CTS 3.7.1.6 states that the structural integrity of the steam turbine assembly shall be maintained in MODES 1 and 2. The steam turbine assembly is used to provide the motive force for the main electrical generator. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.1.7 R.1	3.7.1.7	CTS 3.7.1.7 states that at least one turbine overspeed protection system shall be OPERABLE in MODES 1, 2, and 3. The turbine overspeed protection system is used to prevent a turbine overspeed condition that could result in turbine damage. The turbine overspeed protection system serves no accident mitigation function in any MODE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.2.1 R.1	3.7.2.1	CTS 3.7.2.1 states that the temperature of both the primary and secondary coolants in the steam generators shall be greater than 70° when the pressure of either coolant in the steam generator is greater than 200 psig at all times. The Steam Generator Pressure/Temperature Limitation serves no accident mitigation function in any MODE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.3.1	3.7.3.1	Not used.			

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.3.2 R.1	3.7.3.2	CTS 3.7.3.2 states that two component cooling water system (CC) loops shall be OPERABLE. It is applicable when both units are in MODES 5 or 6. The primary function of the CC System is to provide cooling water to the Residual Heat Removal (RHR) heat exchangers, but does not warrant its own LCO. If insufficient CC is available for RHR, RHR is declared inoperable and the Conditions and Actions for CC in CTS are the same as those for RHR. Unlike other Westinghouse plants, RHR does not share components with the Emergency Core Cooling System (ECCS), and thus does not play a role in DBA mitigation in MODES 1, 2, 3, and 4. Other plants use CC for DBA mitigation functions other than ECCS in MODES 1, 2, 3, and 4, but the CC system at NAPS does not. This makes the CC System at NAPS different from the CC System described in the ISTS, and retaining the CC requirement for MODES 5 and 6 for supporting RHR or any other components not assumed in DBA analysis is inappropriate. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.4.2 R.1	3.7.4.2	CTS 3.7.4.2 states that one service water loop shall be OPERABLE when both units are in MODES 5 or 6. The Service Water (SW) System in MODES 5 or 6 is used to provide cooling water to various safety and nonsafety related systems. Its principal safety function is to cool the Recirculation Spray (RS) heat exchangers which are not required to be OPERABLE in MODES 5 or 6. It also provides cooling water to the Component Cooling Water system (which supports no accident loads), the main control room coolers, instrument air compressors, and charging pump gearbox coolers. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.5.1.b R.1	3.7.5.1.b	CTS 3.7.5.1.b states that one of the ultimate heat sinks that shall be OPERABLE is the North Anna Reservoir with a minimum water level at or above elevation 244 Mean Sea Level, USCG Datum, and average water temperature of $\leq 95^{\circ}$ as measured at the condenser inlet. The North Anna Reservoir provides makeup to the Service Water Reservoir for 30 days after a Design Basis Accident (DBA) as necessary to maintain cooling water inventory, ensuring a continued cooling capability. The Service Water Reservoir is credited as the ultimate heat sink for the DBA. The Service Water Reservoir contains adequate water to provide at least 30 days of cooling to support simultaneous safe shutdown and cooldown of both units and their maintenance in a safe-shutdown condition. The Service Water Reservoir also provides sufficient cooling for at least 30 days in the event of an accident in one unit, to permit control of that accident and permit simultaneous safe shutdown and cooldown of the remaining unit and maintain them in a safe-shutdown condition. The North Anna Reservoir serves as a backup to the Service Water Reservoir. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.6.1 R.1	3.7.6.1	CTS 3.7.6.1 states the maximum elevation of the North Anna Reservoir. If this limit is exceeded, flood control measures are required to protect safety related equipment. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.10 R.1	3.7.10	CTS 3.7.10 states that snubbers shall be OPERABLE. The OPERABILITY of snubbers ensures that the Reactor Coolant System and other safety related fluid systems are adequately restrained and supported during an earthquake and are free to expand and contract during normal operation as the system temperature changes. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.11.1 R.1	3.7.11.1	CTS 3.7.11.1 states each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting materials or 5 microcuries of alpha emitting material, shall be free of greater than or equal to 0.005 microcuries of removable contamination. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.7.12.1 R.1	3.7.12.1 and Table 3.7-5	CTS 3.7.12.1 and Table 3.7-5 provide limits on the total and differential settlement of Class 1 structures. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
CTS 3.7.13 R.1	3.7.13	CTS 3.7.13 requires periodic measurement of the groundwater level at locations around the Service Water Reservoir. The groundwater level of the Service Water Reservoir is used to monitor long-term performance of the Service Water Reservoir dike. Failure to meet the requirements of the LCO does not result in the inoperability of the Service Water System. The ACTIONS direct that evaluations be performed to determine cause and consequences of the high groundwater level. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.1 LA.1	4.8.1.1.2.d.5.c	CTS SR 4.8.1.1.2.d.5.c states that all non-critical EDG trips will be bypassed on a loss of voltage on the emergency bus and/or a safety injection actuation signal. The non-critical trips do not include engine overspeed, generator differential, and EDG output breaker overcurrent. ITS 3.8.1.12 states, "Verify each EDG's automatic trip are bypassed on actual or simulated automatic start signal except engine overspeed and generator differential current. This changes the CTS specifically stating that the non-critical EDG trips are bypassed on any automatic start signal. The specific automatic start signals of a safety injection, a loss of voltage on the emergency bus, and a loss of voltage on the emergency bus with a safety injection actuation are moved to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.1 LA.2	4.8.1.1.2.a.5	CTS SR 4.8.1.1.2.a.5 requires the verification that each EDG is aligned to provide standby power to the associated emergency bus. ITS 3.8.1 SRs do not contain this requirement. This changes the CTS by deleting the requirement from the Technical Specifications and moving it to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.1 LA.3	N/A	Not used.	N/A	N/A	N/A
3.8.1 LA.4	4.8.1.1.2.d.2	CTS Surveillance Requirement 4.8.1.1.2.d.2 states at least once per 18 months during shutdown, verify that the load sequencing timers are OPERABLE with times within the tolerances shown in Table 4.8-1. ITS SR 3.8.1.16 requires the verification of each sequenced load block is within the design tolerance for each emergency load sequencing timer. This changes the CTS by moving the list of required setpoints, tolerances, and initiating signals from the Technical Specifications to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.5	N/A	Not used.	N/A	N/A	N/A

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.1 LA.6	4.8.1.1.2.d.9	CTS Surveillance Requirement 4.8.1.1.2.d.9 requires at least once per 18 months, during shutdown, the verification that the EDG lockout features of the remote local selection switch and the emergency stop switch prevent the EDG from starting. This changes the CTS by moving the requirement for verifying lockout feature requirements from the Technical Specifications to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.7	4.8.1.1.2.f	CTS requirement 4.8.1.1.2.f states once per 24 months during any mode of operation, each EDG will be subjected to a preventive maintenance inspection, in accordance with maintenance procedures appropriate for the diesel used for this class of service. The requirement is not appropriate for the Technical Specifications and is moved to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
3.8.1 LA.8	LCO 3.8.1.1	CTS LCO 3.8.1.1 describes the two required offsite circuits as, "physically independent" and the emergency diesel generators (EDGs) as "separate and independent." ITS LCO 3.8.1 describes the two offsite circuits as "qualified" and states the requirements for the EDGs as "two." The descriptive information, "physically independent" and "separate and independent" is not appropriate for the Technical Specification and is moved to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.1 LA.9	4.8.1.1.2.d.1	CTS Surveillance Requirement 4.8.1.1.2.d.1 requires verification that on a load rejection of 610 kW, the EDG frequency remains \leq 66 Hertz and recovers to a steady state voltage and frequency within specified limits. ITS SR 3.8.1.9 utilizes the phrase "single largest post-accident load" and the specific value of 610 kW is moved to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.2 None	N/A	N/A	N/A	N/A	N/A

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.3 LA.1	LCO 3.8.1.1.b.2, LCO 3.8.1.1.b.3, LCO 3.8.1.2.b.2, LCO 3.8.1.2.b.3	CTS LCO 3.8.1.1.b.2 and 3 and LCO 3.8.1.2.b.2 and 3 state a fuel oil system consisting of two underground tanks each containing a minimum of 45,000 gallons of fuel (This is a shared system with the other unit), and a separate fuel oil transfer system. The inoperability of the fuel oil system affects both units and both units would be required to shutdown if an inoperable fuel oil system were not restored to OPERABLE status within allowed outage times. ITS 3.8.3 does not state the specifics of the fuel oil system, such as the fact that the tanks are underground and that it is a shared system. This information is contained in the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.3 LA.2	3.8.1.1 Action f, and 3.8.1.2 Action b	CTS 3.8.1.1 Action f and 3.8.1.2 Action b require, with one underground fuel oil storage tank of 3.8.1.1.b.2 inoperable, the performance of Surveillance 4.8.1.1.4 or tank repairs, and that replacement fuel oil must be verified as available. This includes the verification of availability of 50,000 gallons of fuel oil and transportation that can deliver it within a 48-hour period. ITS 3.8.3 Condition A states, "One fuel oil storage tank not within limits," verify replacement oil is available, prior to removing tank from service. This changes the CTS by moving the details of transportation of 50,000 gallons of fuel oil within a 48-hour period from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3
3.8.3 LA.3	4.8.1.1.2.b	CTS Surveillance Requirement 4.8.1.1.2.b states that the fuel oil tank is within the acceptable limits specified in Table 1 of ASTM D975 when checked for viscosity, water, and sediment. ITS SR 3.8.3.2 verifies fuel oil properties and SR 3.8.3.4 checks for and removes accumulated water from each stored fuel oil tank. The Bases for SR 3.8.3.2 discusses viscosity and sediment. This changes the CTS by moving the requirements of viscosity and sediment from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	3

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.3 LA.4	3.8.1.1 Action f, 4.8.1.1.4	CTS 3.8.1.1 Action f allows the inoperability of one underground fuel oil tank for the performance of Surveillance Requirement 4.8.1.1.4 or tank repairs. CTS SR 4.8.1.1.4 requires each underground EDG fuel oil storage tank every 10 years to be drained, the sediment to be removed, and the tank to be inspected for integrity, and cleaned. ITS 3.8.3, Condition A, allows one fuel oil storage tank to be inoperable to perform inspection or repair. This changes the CTS by moving these requirements from the specification to the Technical Requirements Manual (TRM).	Technical Requirements Manual	10 CFR 50.59	3
3.8.4 LA.1	LCO 3.8.2.3	CTS LCO 3.8.2.3 describes the specific 125 volt DC buses and batteries, and associated chargers that define Trains H and J requirements. ITS LCO 3.8.4 does not contain these specific requirements and states that the Train H and J DC electrical power subsystems shall be OPERABLE. This changes the CTS by moving information from the Specifications to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.4 LA.2	4.8.2.3.2 f, 4.8.1.1.3.e	CTS surveillance requirements 4.8.2.3.2 f. and 4.8.1.1.3 e. describe the limits of degradation of batteries in terms of capacity. ITS SR 3.8.4.9 does not contain these specific requirements, but continues to require specific testing requirements to ensure battery OPERABILITY. This changes the CTS by moving information from the Specifications to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.4 LA.3	3.8.2.3, Action b	CTS Action b. states that when the 125 volt D.C. battery and /or its charger is inoperable, that they must be restored to OPERABLE status within 2 hours or the unit must be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Surveillance requirements for station and EDG batteries specify requirement for the batteries and chargers. ITS Action A requires both Trains of DC Sources to be OPERABLE and if one becomes inoperable, it must be restored within 2 hours or the unit be placed in MODE 3 in the next 6 hours and MODE 5 in the next 30 hours. This changes the CTS by moving the references to batteries and chargers from the specifications to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.5 LA.1	LCO 3.8.2.2	CTS LCO 3.8.2.2 lists the specific Train H and J requirements. These consist of the 4160-volt emergency buses, 480-volt buses, 120-volt AC buses, and 125-volt DC buses. ITS LCO 3.8.5 states that the DC electrical power subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown," shall be OPERABLE. ITS 3.8.5 does not contain the list of buses that makeup an electrical train. This changes the CTS by moving the makeup of the electrical train from the Technical Specifications to the ITS Bases of ITS LCO 3.8.9, "Distribution Systems-Operating."	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.6 LA.1	4.8.2.3.2 b.3	CTS surveillance requirement 4.8.2.3.2 b.3 states. "Average electrolyte temperature of a least 10 connected cells is above 60 °F." ITS Action B and SR 3.8.6.3 require the "electrolyte temperature of representative cells" to be > 60 °F. This changes the CTS by replacing "10" cells with "representative" cells and moving the 10 cell requirement from the Specification to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.6 LA.2	N/A	Not used.	N/A	N/A	N/A
3.8.7 LA.1	LCO 3.8.2.1 footnote	A footnote to CTS LCO 3.8.2.1 states, "Two inverters may be disconnected from their D.C. Busses for up to 24 hours as necessary, for the purpose of performing an equalizing charge on their associated batteries provided (1) their vital busses are energized, and (2) the remaining vital busses are energized from their associated inverters and connected to their associated D.C. Busses." ITS LCO 3.8.7 Notes to the Actions state that inverters may be disconnected from their associated DC bus for ≤ 24 hours to perform an equalizing charge on their associated battery under two conditions. Condition one, the associated AC vital bus is energized from its constant voltage source transformer. Condition two, all other AC vital busses are energized from their associated OPERABLE inverters. This changes the CTS by moving the requirement that the remaining vital busses are "connected to their associated D.C. Busses," from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.8 None	N/A	N/A	N/A	N/A	N/A

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.9 LA.1	LCO 3.8.2.1, LCO 3.8.2.3, 4.8.2.3.1	CTS LCO 3.8.2.1 states, "The following A.C. electrical busses shall be OPERABLE and energized . . ." CTS LCO 3.8.2.3 states, "The following D.C. bus trains shall be energized and OPERABLE . . ." CTS 3.8.2.1 Actions a and b state, " With one of the required AC or AC Vital Buses not energized, re-energized bus," within specific allowed outage times. Similarly, CTS SR 4.8.2.3.1 states, "Each D.C. bus train shall be determined OPERABLE and energized . . ." ITS LCO 3.8.9 states, "The Train H and Train J AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE." ITS SR 3.8.9 1 states, "Verify correct breaker alignments and voltage to required AC, DC, and AC vital bus electrical power distribution subsystems." This changes the CTS by moving the requirement for the buses to be energized with tie breakers open between redundant buses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.8.9 LA.2	LCO 3.8.2.1, LCO 3.8.2.3	CTS LCO 3.8.2.1 states, "The following A.C. electrical busses shall be OPERABLE . . .H and J A.C. emergency busses," with 4160, 480, and 120 VAC buses specified. CTS LCO 3.8.2.3 states that the Train A and Train B DC buses with specific designations. ITS 3.8.9 states, "Train H and Train J AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE." This changes the CTS by moving the specific names of the buses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.8.10 LA.1	LCO 3.8.2.2	CTS LCO 3.8.2.2 states, "The following A.C. electrical busses shall be OPERABLE . . . H and J A.C. emergency busses," with 4160, 480, and 120 VAC busses specified. ITS 3.8.10 states, "The necessary portion of AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE." This changes the CTS by moving description of the busses from the Specification to the Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
CTS 3.8.2.5 R.1	Unit 2 3.8.2.5	Unit 2 CTS 3.8.2.5 states the primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
CTS 3.8.2.6 R.1	Unit 2 3.8.2.6	Unit 2 CTS 3.8.2.6 states the thermal overload protection devices, integral with the motor starter, of each valve in the safety system shall be OPERABLE. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A
CTS 3.8.2.7 R.1	Unit 2 3.8.2.7	Unit 2 CTS 3.8.2.7 states that all circuits that have containment penetrations and are not required during reactor operations shall be de-energized. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	N/A

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
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Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
3.9.1 I.A.1	3.9.1	CTS 3.9.1 states that the boron concentration in MODE 6 shall be the more restrictive of a K_{eff} of 0.95 or a boron concentration of ≥ 2600 ppm for Unit 1 and ≥ 2300 ppm for Unit 2. ITS LCO 3.9.1 states that the boron concentration shall be within the limit specified in the COLR. This changes the CTS by relocating the MODE 6 boron concentration limit to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.9.2 I.A.1	Unit 2 3.1.1.3.2 Action	Unit 2 CTS 3.1.1.3.2 Action states that with the primary grade water flow path isolation valves not locked, sealed, or otherwise secured in the closed position, verify the SHUTDOWN MARGIN is greater than or equal to 1.77% $\Delta k/k$. ITS 3.9.2, Action A.4, states this requirement as, "Perform SR 3.9.1.1." ITS SR 3.9.1.1 requires verification that the RCS boron concentration is within the limit provided in the COLR. This changes the CTS by moving the SHUTDOWN MARGIN value to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	5
3.9.2 I.A.2	3.1.1.3.2	Unit 1 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 1-CH-217 or b. 1-CH-220, 1 CH-241, FCV 1114B and JCV-1113B." Unit 2 CTS 3.1.1.3.2 states "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities: a. 2-CH-140 or b. 2-CH-160, 2 CH-156, FCV 2114B and FCV-2113B." ITS 3.9.2 states, "Primary grade water flow paths shall be isolated from the RCS." ITS 3.9.2 LCO Note states, "Primary grade water flow path isolation valves may be opened under administrative control for planned boron dilution or makeup activities." This changes	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1

Change Category:

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

Table R – Relocated Specifications and Removed Details
 ITS Section 3.9 – Refueling Operations

		the CTS by relocating the list of primary grade water flow path isolation valves to the ITS Bases. The other changes in CTS 3.1.1.3.2 are discussed in DOC A.2.			
3.9.3 L.A.1	LCO 3.9.2	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. ITS 3.9.3 LCO states that two source range neutron flux monitors shall be OPERABLE. This changes the CTS by moving the requirement that each channel has a continuous visual indication the control room and with one audible indication in the containment from the specification to the ITS Bases.	Bases	ITS 5.5.13, Technical Specifications Bases Control Program	1
3.9.4 None	N/A	N/A	N/A	N/A	N/A
3.9.5 None	N/A	N/A	N/A	N/A	N/A
3.9.6 None	N/A	N/A	N/A	N/A	N/A
3.9.7 R.1	3.9.10.2	CTS 3.9.10.2 states that the refueling cavity water level must be at least 23 feet above the fuel during MODE 6 during movement of control rods within the reactor pressure vessel. Movement of control rods is not an initiator of any LPSAR accident analysis. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.3 R.1	3.9.3	CTS 3.9.3 states that the reactor must be subcritical for at least 150 hours prior to movement of movement of irradiated fuel in the reactor pressure vessel. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.5 R.1	3.9.5	CTS 3.9.5 states that direct communications shall be maintained between the control room and personnel at the refueling station during CORE ALTERATIONS. This	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
- 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
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Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

CTS 3.9.9 R.1	3.9.9	ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS. The prompt notification of the control room of a fuel handling accident is an assumption in the Fuel Handling Analysis. This prompt notification is used to ensure that the control room is isolated promptly and is necessary to meet the control room operator dose limits in General Design Criteria 19. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.7 R.1	3.9.7	CTS 3.9.7 places restriction on movement of loads over irradiated assemblies in the spent fuel pit in excess of 2500 pounds. This represents the working load of the fuel assembly plus gripper. The LCO ensures that in the event this load is dropped the activity release will be limited to that contained in a single fuel assembly and any possible distortion of fuel in the storage racks will not result in a critical array. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	Technical Requirements Manual	10 CFR 50.59	R
CTS 3.9.6 R.1	3.9.6	CTS 3.9.6 states that the manipulator crane and auxiliary hoist shall be used for movement of control rods or fuel assemblies and shall be OPERABLE during movement of control rods or fuel assemblies within the reactor pressure vessel. This specification ensures that the lifting device on the Manipulator Crane has adequate capacity to lift the weight of a fuel	Technical Requirements Manual	10 CFR 50.59	R

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting TS Requirements and Related Reporting
- 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
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Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations

		<p>assembly and a Rod Control Cluster Assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. This specification also ensures that the auxiliary hoist on the Manipulator Crane has adequate capacity for latching and unlatching control rod drive shafts. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.</p>			
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Change Category:

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

Table R – Relocated Specifications and Removed Details
 ITS Section 4.0 – Design Features

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
4.0 L.A.1	5.1	CTS 5.1 contains information on the site exclusion area, the low population zone, and unrestricted areas for radioactive gaseous and liquid effluents. CTS 5.1 includes Figure 5.1.1, Map Defining Unrestricted Areas for Radioactive Gaseous and Liquid Effluents, and Figure 5.1.2, Low Population Zone. The ITS does not contain this information. This changes the CTS by removing this information.	UFSAR	10 CFR 50.59	1
4.0 L.A.2	5.2	CTS 5.2 describes the reactor containment building. The ITS does not contain this information. This changes the CTS by eliminating the description of the containment.	UFSAR	10 CFR 50.59	1
4.0 L.A.3	5.3.1	CTS 5.3.1 contains details of fuel assembly design, such as number of fuel rods per fuel assembly, the fuel rod nominal active fuel length, and the initial core loading maximum enrichment. The ITS does not contain these details and, instead, provides a general statement which states, "Each assembly shall consist of a matrix of Zircaloy or ZIRLO fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO ₂) as fuel material." This changes the CTS by eliminating the detailed description of fuel assemblies.	UFSAR	10 CFR 50.59	1
4.0 L.A.4	5.3.2	CTS 5.3.2 contains details of control rod design, such as the nominal length of absorber material, percentage of each absorber material, and control rod cladding material. The ITS does not contain these details and, instead, provides a general statement which states, "The control material shall be silver indium cadmium as approved by the NRC." This changes the CTS by eliminating the detailed description of control rod assemblies.	UFSAR	10 CFR 50.59	1

Change Category:

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

North Anna Power Station

Table R – Relocated Specifications and Removed Details
 ITS Section 4.0 – Design Features

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
4.0 LA.5	5.2	CTS 5.2 describes the reactor coolant system. The ITS does not contain this information. This changes the CTS by eliminating the description of the reactor coolant system.	UFSAR	10 CFR 50.59	I
4.0 LA.6	5.5	CTS 5.5 describes the location of the meteorological tower. The ITS does not contain this information. This changes the CTS by eliminating the location of the meteorological tower.	UFSAR	10 CFR 50.59	I

Change Category:

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

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.1	6.8.1.i	CTS 6.8.1.i requires written procedures be established, implemented and maintained covering, "Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975." ITS 5.4.1.c does not include the Regulatory Guide references. This changes the CTS by moving the references to the Regulatory Guides to the UFSAR.	UFSAR	10 CFR 50.59	3
5.0 LA.2	5.7.1	CTS 5.7.1 states, "The components identified in Table 5.7-1 are designed and shall be maintained within the cyclic or transient limits of Table 5.7-1." CTS Table 5.7-1 contains the limits for component cyclic or transient limits and designs cycle or transient limits. ITS 5.5.5 states, "The components identified in the UFSAR, Section 5.2, are designed and shall be maintained within the cyclic or transient design limits." This changes the CTS by moving the limits specified in Table 5.7-1 to the UFSAR and calling them the cyclic or transient design limits.	UFSAR	10 CFR 50.59	1
5.0 LA.3	6.8.4.b	CTS 6.8.4.b, "In-Plant Radiation Monitoring," describes a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. ITS 5.0 does not require such a program. This change moves the requirements of CTS 6.8.4.b to the UFSAR.	UFSAR	10 CFR 50.59	Note 1

Change Category:

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

Note 1 - Certain Relocated Specifications and Removed Details 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 change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.4	6.2.3	CTS 6.2.3 specifies the function, composition, responsibility, and authority of the Station Nuclear Safety (SNS). ITS 5.2 does not contain this requirement. This changes the CTS by deleting the requirements of CTS 6.2.3 and relocating them to the QA Topical Report.	QA Topical Report	10 CFR 50.59	Note 1
5.0 LA.5	4.7.7.1 and 4.7.8.1	CTS 4.7.7.1 (Control Room Emergency Ventilation System) and 4.7.8.1 (Safeguards Area Ventilation System) specify the Surveillance Requirements and Frequencies for demonstrating OPERABILITY. ITS 5.5.10, "Ventilation Filter Testing Program (VFTP)" does not include some of the Surveillance Requirements and Frequencies specified in the CTS. This changes the CTS by moving these details to the VFTP.	VFTP	ITS 5.5.10, Ventilation Filter Testing Program (VFTP)	3
5.0 LA.6	6.5, 6.6.1.b, 6.8.2, 6.8.3, and 6.15.b	CTS 6.5, 6.6.1.b, 6.8.2, 6.8.3, and 6.15.b specify the function, composition, use of alternates, meeting frequency, quorum, responsibilities, authority, and records of the Station Nuclear Safety and Operating Committee (SNSOC) and the Management Safety Review Committee (MSRC). CTS 6.5 also specifies the use of consultants, reviews and audits for the MSRC. ITS 5.0 does not contain these requirements. This changes the CTS by relocating the requirements for the SNSOC and MSRC to the QA Topical Report.	QA Topical Report	10 CFR 50.59	Note 1

Change Category:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
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Note 1 - Certain Relocated Specifications and Removed Details 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 change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.7	3.11.1.4, 3.11.2.5 and 3.11.2.6	CTS 3.11.1.4, Liquid Holdup Tanks, imposes limits on the quantity of radioactive material contained in each tank. CTS 3.11.2.5, Explosive Gas Mixture, limits the oxygen concentration in the Waste Gas Decay Tanks to ensure that the concentration of potentially explosive gas mixtures in the Waste Gas Decay Tanks is maintained below the flammability limits for hydrogen and oxygen. CTS 3.11.2.6, Gas Storage Tanks, imposes limits on the quantity of radioactive material contained in each tank. ITS 5.5.11, "Explosive Gas and Storage Tank Radioactivity Monitoring Program," does not contain the specific requirements, Applicability, Actions, and Surveillance Requirements in CTS 3.11.1.4, CTS 3.11.2.5, and CTS 3.11.2.6. This changes the CTS by moving this information to the TRM.	Technical Requirements Manual	10 CFR 50.59	3
5.0 LA.8	6.8.4.g	CTS 6.8.4.g contains the requirements for the Configuration Risk Management Program. ITS 5.0 does not include requirements for the Configuration Risk Management Program. This changes the CTS by moving the requirements for the Configuration Risk Management Program to the UFSAR.	UFSAR	10 CFR 50.59	3
5.0 LA.9	6.9.1.7.e	CTS 6.9.1.7.e specifies the revisions and dates of the referenced methodologies, and the LCOs for which the referenced methodologies are used. ITS 5.6.5.b does not contain this level of detail. This changes the CTS by moving the specific methodology references for revisions, dates, and LCOs to the COLR.	COLR	ITS 5.6.5, Core Operating Limits Report	1

Change Category:

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

Note 1 - Certain Relocated Specifications and Removed Details 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 change.

Table R – Relocated Specifications and Removed Details
ITS Section 5.0 – Administrative Controls

DOC No.	CTS Requirement	Description of Relocated Requirements	Location	Change Control Process	Change Category
5.0 LA.10	6.8.4.f	CTS 6.8.4.f, "Radiological Environmental Monitoring Program," describes a program to monitor the radiation and radionuclides in the environs of the plant. ITS 5.0 does not require such a program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the ODCM.	ODCM	10 CFR 50.59	Note 1
5.0 LA.11		DELETED			
5.0 LA.12	4.6.1.1.c	CTS 4.6.1.1.c states, "After each closing of the equipment hatch, by leak rate testing the equipment hatch seals, with gas at P _a greater than or equal to 44.1 psig. Results shall be evaluated against the criteria of Specification 3.6.1.2.b as required by 10 CFR 50, Appendix J, option B, as modified by approved exemptions, and in accordance with the guidelines contained in Regulatory Guide 1.163, dated September 1995." ITS 5.0 does not include such a specific requirement for the equipment hatch. This changes the CTS by moving the reference leak rate testing for the equipment hatch to the Containment Leak Rate Testing Program (CLRTP).	CLRTP	10 CFR 50.59	3

Change Category:

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

Note 1 - Certain Relocated Specifications and Removed Details 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 change.