

Prairie Island Nuclear Generating Plant

Attachment 4

to

Supplement dated May 10, 2002

to License Amendment Request dated December 11, 2000

Conversion to Improved Technical Specifications (ITS)

SER Tables

Table A – Administrative Changes
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A1.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not revise or delete any technical requirements.	1.1	1.0
A1.0-01	Rewords CTS definitions of ACTIONS, CHANNEL CHECK, CORE ALTERATION, COLR, DOSE EQUIVALENT I-131, E-AVERAGE DISINTEGRATION ENERGY, OPERATIONAL MODE - MODE, OPERABLE - OPERABILITY, PTLR, QPTR, RTP, SDM, and STAGGERED TEST BASIS. These changes do not revise the meaning or intent of the current PI definitions.	1.1	1.0 ACTIONS, CHANNEL CHECK, CORE ALTERATION, COLR, DOSE EQUIVALENT I- 131, E-AVERAGE DISINTEGRATION ENERGY, OPERATIONAL MODE - MODE, OPERABLE - OPERABILITY, PTLR, QPTR, RTP, SDM, and STAGGERED TEST BASIS
A1.0-04	Rewords CTS definition of CHANNEL CALIBRATION to specifically reference testing of resistance temperature detectors or thermocouple sensors, allowing in place qualitative assessment of sensor behavior, and normal calibration of the remaining devices in the channel. These changes do not substantively change the Prairie Island methodology for calibration of plant instrumentation.	1.1	1.0 CHANNEL CALIBRATION
A1.0-05	Updates CTS reference for COLR in accordance with NRC approved LAR.	1.1	1.0 COLR

Table A – Administrative Controls
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A1.0-06	Rewords CTS wording and re-titles definition of CHANNEL FUNCTIONAL TEST to conform to CHANNEL OPERATIONAL TEST (COT). These changes do not substantively change the PI methodology for testing of these instruments.	1.1	1.0 CHANNEL FUNCTIONAL TEST
A1.0-08	Did not include CTS definition of LIMITING SAFETY SYSTEM SETTINGS. This is an Administrative change since the justification for not including LIMITING SAFETY SYSTEM SETTINGS is in the discussion of CTS.	NA	1.0 LSSS
A1.0-09	Rewords CTS definition of OPERABLE - OPERABILITY. Additional clarification was provided specifically allowing credit for both "normal or emergency power" instead of only stating normal power. These changes do not substantively change the definition of OPERABLE - OPERABILITY.	1.1	1.0 OPERABLE
A1.0-11	Rewords CTS definition of PHYSICS TESTS. The allowed power level for PHYSICS TESTS is now related to the definition of power level at which the MODE changes from MODE 2 to MODE 1.	1.1	1.0 PHYSICS TESTS
A1.0-12	Did not include CTS definition for PROTECTION INSTRUMENTATION AND LOGIC since it is not used in the ITS.	NA	1.0 PROTECTION INSTR & LOGIC
A1.0-18	Did not include CTS definition for SOURCE CHECK since it is addressed within the definition of CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST (COT).	NA	1.0 SOURCE CHECK
A1.0-19	Rewords CTS STAGGERED TEST BASIS by deleting the second paragraph which is consistent with rules and use of ISTS STAGGERED TEST BASIS. Any differences in use of this term between CTS and ITS are accounted for by changing instrument test Frequencies in Section 3.3.	1.1	1.0 STAGGERED TEST BASIS

Table A – Administrative Controls
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A1.0-21	Did not include CTS definition for STARTUP OPERATION since the CTS and ITS are consistent and all phases of plant operation are included within the definition of MODES listed in Table 1.1-1.	NA	1.0 STARTUP
A1.0-24	Clarifies use of Logical Connectors to aid in the understanding and use of the new format, presentation style, and establish positions not previously formalized. These changes do not involve any substantive changes in plant operations or testing.	1.2	NA
A1.0-28	Adds a section explaining the use of the Frequencies specified within the SRs to aid in the understanding and use of the ITS format, presentation style, and establish positions not previously formalized. This explanation does not involve any substantive change in plant operations or testing.	1.4	NA
A1.0-29	Rewords CTS clarifying that SRs can be suspended when the plant is not in the Mode of Applicability associated with the SR. The intent of the CTS and NUREG/ITS requirements are the same and no plant operating or testing requirement changes have been introduced.	1.4	4.1.D

Table L – Less Restrictive Changes
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L1.0-22	<p>Revises definition of operating MODES including MODE title changes.</p> <p>Redefines reactivity conditions to change MODES at 0.99 Keff rather than "Critical".</p> <p>Revises RATED THERMAL POWER (RTP) at which the MODE changes from MODE 2 to MODE 1 from 2% to 5%. This change also allows PHYSICS TESTS to be performed at power levels up to 5% RTP.</p> <p>Average reactor coolant temperature requirements remain functionally the same except that CTS MODE 5 was less than 200 °F and ITS is less than or equal to 200 °F. MODE 4 changed accordingly to interface with the new limit for MODE 5.</p> <p>Deletes Column entitled, "REACTOR VESSEL HEAD CLOSURE BOLTS FULLY TENSIONED", since this facet of the MODE definition is included in footnotes.</p>	Table 1.1-1	Table 1-1	1, 2

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No	Summary	Control Change Process	Location	CTS Sect	Change Type
LR1.0-03	Relocates elements of the definition for AUXILIARY BUILDING SPECIAL VENTILATION ZONE INTEGRITY.	5.5.12, Bases Control Program	Bases	1.0 ABSVZ INTEGRITY	2
LR1.0-07	Relocates elements of the definition for CONTAINMENT INTEGRITY.	5.5.12, Bases Control Program	Bases	1.0 CONTAINMENT INTEGRITY	2
LR1.0-14	Relocates definition for REPORTABLE EVENT, which is contained in 10CFR50.72 and 10CFR50.73.	10CFR50.59	TRM	1.0 REPORTABLE EVENT	3, 4
LR1.0-16	Relocates elements of the definition for SHIELD BUILDING INTEGRITY.	5.5.12, Bases Control Program	Bases	1.0 SHIELD BLDG INTEGRITY	2

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M1.0-02	Adds new definitions for ACTUATION LOGIC TEST, AXIAL FLUX DIFFERENCE (AFD), LEAKAGE, MASTER RELAYS, REACTOR TRIP SYSTEM (RTS) RESPONSE TIME, SLAVE RELAYS, and TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT).	1.1	1.0 ACTUATION LOGIC TEST, AXIAL FLUX DIFFERENCE (AFD), LEAKAGE, MASTER RELAY TEST, REACTOR TRIP SYSTEM (RTS) RESPONSE TIME, SLAVE RELAY TEST, and TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)
M1.0-13	Replaces CTS definition of CHANNEL RESPONSE TEST with REACTOR TRIP SYSTEM (RTS) RESPONSE TIME, which includes more details on testing.	1.1	1.0 CHANNEL RESPONSE TEST and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME
M1.0-17	Revises CTS definition for SHUTDOWN MARGIN to include new requirements in Technical Specifications.	1.1	1.0 SDM

Table M – More Restrictive Changes
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M1.0-26	Adds new requirements to Technical Specifications in Section 1.3, Completion Times to aid in the understanding and use of the new format and presentation style, and to establish rules of usage not previously formalized.	1.3	NA
M1.0-27	Replaces CTS 48 hour allowance to perform a SR if it cannot be performed until the plant enters the Mode of Applicability, with a more limiting specific allowable time or condition(s) for testing.	1.4	4.1.D

Table R – Relocated Specifications and Removed Details
ITS Chapter 1.0 – Use and Application
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Chapter 2.0 – Safety Limits
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A2.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not revise or delete any technical requirements.	LCO 2.0	LCO 2.0
A2.0-01	Minor format and wording changes have been made to CTS Section 2.1, 2.2.A, and 2.2.B. Which do not change the meaning, limits or otherwise change plant operation or testing.	LCO 2.1.1, 2.2.1, and 2.2.2	LCO 2.1, 2.1.B, 2.2, 2.2.A, and 2.2.B

Table L – Less Restrictive Changes
ITS Chapter 2.0 – Safety Limits
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Chapter 2.0 – Safety Limits
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR2.0-02	Relocates discussion clarifying that the thermal power is measured in ΔT on the curve.	5.5.12, Bases Control Program	Bases	LCO 2.1.A	2
LR2.0-03	Relocates detailed information for notifying the NRC of a Safety Limit violation in accordance with 10CFR50.72, a written report in accordance with 10CFR50.73 and cessation of operation until NRC authorization.	10CFR50.72, 10CFR50.73, and 10CFR50.59	TRM	LCO 2.2.C, 2.2.E and 2.2.F	3
LR2.0-04	Relocates detailed information requiring notification of corporate management and the chairman of the Safety Audit Committee within 24 hours.	10CFR50.59	TRM	LCO 2.2.D	3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Chapter 2.0 – Safety Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
NONE	NONE	NONE	NONE

Table R – Relocated Specifications and Removed Details
ITS Chapter 2.0 – Safety Limits
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 ©(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.0 – LCO Applicability/SR Applicability
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.0	LCO 3.0 and 4.0
A3.0-01	Rewords and restates CTS phraseology for LCOs 3.0.A, 3.0.B, and 3.0.C. These changes include 1) using standard MODES of Operation such as MODE 1 and etc. instead of POWER OPERATIONS, 2) dividing LCO 3.0.A into two separated LCOs; and 3) listing those specific LCOs providing exemptions to the applicable LCO. The CTS requirements are basically the same in ITS 3.0 Specifications.	LCO 3.0.1, 3.0.2, and 3.0.3	LCO 3.0.A, 3.0.B, 3.0.C, 3.0.C.1, and 3.0.C.2
A3.0-02	Clarifies CTS requirements for Completion Times to state the total time from when the Condition was first entered and use the MODE number. CTS and ITS Completion Times are the same. Any differences are addressed in a separate Discussion of Change.	LCO 3.0.3	LCO 3.0.C.1 and 3.0.C.2
A3.0-04	Clarifies that ITS 3.0.3 only applies in MODES 1, 2, 3, and 4 which is consistent with the intent of CTS.	LCO 3.0.3	3.0.C
A3.0-09	Clarifies CTS relationship between Technical Specification and non-Technical Specification systems which support ITS.	LCO 3.0.8	NA
A3.0-12	Clarifies CTS intent for the application of test exception LCOs for the purpose of performing PHYSICS TESTING. This change does alter any plant operations or technical requirements.	LCO 3.0.7	NA
A3.0-13	Clarifies and formalizes the use of the PI ITS for two units.	LCO 3.0.9	NA

Table A – Administrative Changes
Section 3.0 – LCO Applicability/SR Applicability
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.0-14	Retains CTS requirements for managing SR performance at PI based on a "fixed schedule" surveillance program. The ITS retains CTS requirements for the refueling cycle, limiting the refueling cycle to two years.	LCO 3.0.2	LCO 4.0.A.1 and 4.0.A.2
A3.0-17	Clarifies CTS requirements and limitations that the SRs shall be meet during the MODES or Other Specified Conditions in the Applicability for which the requirements of the LCO apply. This change does not impose any new requirements and is consistent with current practice at the PI plant.	LCO 3.0.1	LCO 4.0.B
A3.0-18	Rewords CTS requirements deferring entry into Required Actions. ITS wording allows delaying declaration that the LCO is not met rather than delaying only the ACTIONS. These changes are off-setting considerations and the intent remains the same.	LCO 3.0.3	LCO 4.0.B

Table L – Less Restrictive Changes
ITS Section 3.0 – LCO Applicability/SR Applicability
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.0-20	Relaxes CTS requirements allowing up to 24 hours for a missed SR. ITS allows 24 hours up to the stated interval with appropriate risk assessment justification.	LCO 3.0.3	LCO 4.0.B	3, 10

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.0 – LCO Applicability/SR Applicability
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.0 – LCO Applicability/SR Applicability
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.0-03	Adds new, more restrictive LCO requiring the plant to be in MODE 4 within 13 hours following entry into LCO 3.0.3.	LCO 3.0.3	LCO 3.0.C.1
M3.0-06	Adds new LCO restrictions, which preclude entry into a MODE or Other Specified Condition in the Applicability (MOSCA) when a LCO is not met. The new LOC 3.0.4 may impose restrictions on the changes in MOSCA which do not exist in the CTS.	LCO 3.0.4	NA
M3.0-07	Adds new LCO, which restricts current plant practices allowing equipment to be removed from service or declared inoperable to comply with ACTIONS.	LCO 3.0.5	NA
M3.0-11	Adds new LCO, which restricts current plant practices clarifying actions necessary to be taken when a system or support system that has its own LCO is inoperable. The supported system(s) are not required to be declared inoperable if they are inoperable due to support system inoperability. The supported systems' Conditions and Required Actions are not entered unless directed to do so by the support system's Required Actions.	LCO 3.0.6	NA
M3.0-16	Adds new SR supporting the ITS format changes and makes the ITS complete by not allowing plant operation or testing that will cause an unsafe condition.	LCO 3.0.2	LCO 4.0.A.1
M3.0-19	Adds new SR establishing the requirement that all applicable SRs shall be met before entry into a MODE or Other Specified Condition in the Applicability.	LCO 3.0.4	NA

Table R – Relocated Specifications and Removed Details
ITS Section 3.0 – LCO Applicability/SR Applicability
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.1-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.1.8	LCO 3.1.F, 3.10, SR 4.9, Table 4.1-2A and Table 4.1-1C
A3.1-01	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.1.3, Conditions A and B, LCO 3.1.1, and 3.1.5	LCO 3.1.F.1, 3.1.F.3.a, 3.10.A.1, and 3.10.D.1
A3.1-02	Did not include meaningless CTS statement resulting from the new ITS format. No new limits are added to the ITS and the CTS limits are stated in the ITS.	NA	LCO 3.1.F.1 and 3.1.F.3.a
A3.1-06	Did not include meaningless CTS statements which are not contained in the ITS. This change does not affect any operating limits or conditions.	NA	LCO 3.1.F.3.a
A3.1-08	Did not include duplicative CTS NRC reporting requirements which are also outlined and submitted in accordance with 10CFR50.72 and 10CFR50.73.	NA	LCO 3.1.F.3.c
A3.1-12	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, into the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	NA	LCO 3.10 and SR 4.9
A3.1-34	Restates CTS requirements for declaring a misaligned rod inoperable, however, both require verifying SDM, taking remedial action, and allowing the plant to continue to operate. This paragraph does not have any net change on plant operations under ITS requirements.	NA	LCO 3.10.E.2

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.1-36	Clarifies CTS operating practices allowing for Separate Condition Entry for each inoperable rod position indicator and demand position indicator.	LCO 3.1.7	LCO 3.10.F
A3.1-48	Restates CTS requirements declaring a misaligned rod being inoperable with the ITS requirement of declaring the rod of being misaligned. In either case, the plant would continue to operate, thus not making a difference in plant operations or impact.	LCO 3.1.4, Condition A	LCO 3.10.G.5
A3.1-52	Rewords CTS requirements for when a rod is trippable but not movable, verifying that the rod position is within insertion limits to the ITS wording of verification that the rod alignment is within limits. This wording change does not change the impact on plant operations.	LCO 3.1.4, Condition A	LCO 3.10.G.6
A3.1-54	Rewords CTS Action Statement from one or more inoperable rods to one or more misaligned rods. This change does not affect plant operations or any technical requirements.	LCO 3.1.4, Condition D	LCO 3.10.G.5
A3.1-57	Rewords CTS terminology "loss of stationary gripper coil voltage" with "beginning of decay of stationary gripper coil voltage". This terminology does not change the SR performance and clarifies CTS intent.	SR 3.1.4.3	LCO 3.10.H

Table L – Less Restrictive
ITS Section 3.1 – Reactivity Control Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.1-21	Eliminates CTS requirement to enter LCO 3.0.C which requires entering MODE 3 in 6 hours and MODE 5 in 36 hours. The ITS only requires the plant to go to MODE 3 in 6 hours and not continue to MODE 5 for the same Condition.	LCO 3.1.5	LCO 3.0.C, 3.0.C, and 3.10.D.1	4, 9
L3.1-23	Eliminates CTS requirements to comply with the control bank insertion limits when "approaching criticality". The ITS only requires meeting control bank insertion limits when in MODES 1 and 2 with $K_{eff} \geq 1.0$.	LCO 3.1.6	LCO 3.10.D.2	2
L3.1-26	Eliminates CTS requirements to enter LCO 3.0.C which requires entering MODE 3 in 6 hours and MODE 5 in 36 hours. The ITS only requires the plant to go to MODE 3 in 6 hours and not continue to MODE 5 for the same Condition.	LCO 3.1.6	LCO 3.0.C and 3.10.D	4, 9
L3.1-28	Eliminates CTS requirements for ITC, Rod Group Alignment, and RCS Minimum Temperature for Criticality requirements from being met during PHYSICS TESTS.	LCO 3.1.8, LCO 3.1.5 Note, and LCO 3.1.6 Note	LCO 3.10.D.3	2, 4
L3.1-63	Eliminates CTS OPERABILITY requirements for the Analog Rod Position Indication System in MODES 3, 4, and 5 when the reactor trip system breakers are closed and the control rod drive system is capable of rod withdrawal.	NA	Table 4.1-1C Function 2 Note 31	1, 2

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.1-64	Relaxes CTS requirements to functionally test the rod position indication "prior to each startup following shutdown in excess of two days if not done in the previous 30 days". The ITS requires this test to be performed "prior to criticality after each removal of the reactor head".	SR 3.1.7.1	Table 4.1-1C Note 30	3
L3.1-67	Increases CTS Completion Time for determining core power distribution from 2 hours to 8 hours.	LCO 3.1.4	LCO 3.10.E.1	6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.1 – Reactivity Control Systems
(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.1-03	Relocates the term, "with all rods withdrawn" to the COLR, which defines the conditions to which the specific rod withdrawal limits apply.	Methodology	COLR	LCO 3.1.F.1 and 3.1.F.2	1, 2
LR3.1-07	Relocates detailed methods of assuring that the control rods are maintained within the administrative withdrawal limits until a subsequent calculation verifies they have been restored to within limits.	5.5.12, Bases Control Program	Bases	LCO 3.1.F.3.b	2, 3
LR3.1-37	Relocates bank demand step detailed information which defines the capabilities of the control position indication system.	5.5.12, Bases Control Program	Bases	LCO 3.10.F.1	1, 2
LR3.1-43	Relocates the CTS definition of an inoperable rod for the associated Action Statements.	5.5.12, Bases Control Program	Bases	LCO 3.10.G.1	2
LR3.1-51	Relocates CTS detailed information that the potential ejected rod worth and associated transient power distribution peaking factors, including allowance for non-uniform fuel depletion in the neighborhood of the inoperable rod, shall be determined by analysis.	5.5.12, Bases Control Program	Bases	LCO 3.10.G.5	2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.1 – Reactivity Control Systems

(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.1-59	Relocates CTS detailed information for instrument surveillances on the rod bank insertion limit monitor, rod position deviation monitor, and additional logging of the rod positions when these monitors are inoperable.	10 CFR 50.59	TRM	LCO 3.10.1.1 and Table 4.1-1C Functions 1, 2, and 4, and Note 32	1, 2
LR3.1-65	Relocates CTS detailed information to measure rod drop times after each refueling, following maintenance or modification to the control rod drive system.	10CFR50.59	TRM	Table 4.1-2A Item 1	2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.1-04	Adds new LCO requirements that the lower ITC limits shall be met in MODES 1, 2, and 3.	LCO 3.1.3	LCO 3.1.F.1
M3.1-09	Adds new Required Action to address the EOC lower limit.	LCO 3.1.3, Conditions C and D	NA
M3.1-11	Adds new SRs to verify that the ITC is within the upper limit and to verify that the ITC will be within limits when RTP reaches 70%.	SR 3.1.3.1, 3.1.3.2, and 3.1.3.3	NA
M3.1-17	Adds a new SR to verify SDM is within limits every 24 hours.	SR 3.1.1.1	LCO 3.10.A.2
M3.1-18	Adds specific Required Actions and shutdown requirements when the core reactivity differs from the predicted value.	LCO 3.1.1 and 3.1.2, Conditions A and B	LCO 3.10.A.3 and SR 4.9
M3.1-19	Adds new SR to verify measured core reactivity is within limits prior to entering MODE 1 after each refueling outage.	SR 3.1.2.1	LCO 3.10.A
M3.1-22	Adds a new SR to verify every 12 hours that shutdown banks are within their insertion limits as specified in the COLR.	SR 3.1.5.1	LCO 3.10.D
M3.1-24	Adds new Condition and Required Actions to ensure that the control bank sequence and overlap limits shall be met or the unit must be placed in MODE 2 with $K_{eff} \geq 1.0$.	LCO 3.1.6	LCO 3.10.D.2

Table M – More Restrictive Changes
Section 3.1 – Reactivity Control Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.1-27	Adds new SRs to verify estimated critical control bank position is within limits in the COLR, verify control banks are within their insertion limits and verify sequence and overlap limits are met.	SR 3.1.6.1, 3.1.6.2, and 3.1.6.3	LCO 3.10.D.3
M3.1-29	Adds new SRs to perform a COT on power and intermediate range NIS channels, verify RCS lowest loop average temperature, verify Thermal Power and verify SDM is within limits.	SR 3.1.8.1, 3.1.8.2, 3.1.8.3, and 3.1.4.4	LCO 3.10.D.3
M3.1-31	Reduces CTS flexibility to perform the rod worth measurement in the N-1 condition.	NA	LCO 3.10.D.3
M3.1-32	Adds new Required Actions verifying that the SDM requirements are met or initiate boration if a cluster control assembly is misaligned from its bank by more than 24 steps.	LCO 3.1.4, Condition B	LCO 3.10.E.1
M3.1-38	Expands the MODE of Applicability from MODE 1 to include both MODES 1 and 2. CTS requires each channel of the RPI to be OPERABLE in MODE 1. The ITS extends the MODE of Applicability to MODE 2.	LCO 3.1.7	LCO 3.10.F.1, 3.10.F.2, 3.10.F.3, and 3.10.F.4
M3.1-42	Adds a new Action Statement for demand position indications.	LCO 3.1.7, Condition A	LCO 3.10.F
M3.1-44	Reduces operational flexibility by imposing a restriction that with one or more rods inoperable, restore the inoperable rod to OPERABLE within 6 hours or be in MODE 3, whereas the CTS would allow continued operation with one rod inoperable.	LCO 3.1.4, Condition A	LCO 3.10.G.2
M3.1-47	Adds requirements that whenever a rod is inoperable, the SDM requirements shall be met within one hour or initiate boration.	LCO 3.1.4, Condition A	LCO 3.10.G.3 and 3.10.G.4

Table M – More Restrictive Changes
Section 3.1 – Reactivity Control Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.1-53	Adds a new Condition and Required Actions that with one rod inoperable, the unit is to be in MODE 3 within 6 hours. The CTS would require the rod to be declared inoperable and operation can continue.	LCO 3.1.4, Condition C	LCO 3.10.G
M3.1-62	Reduces flexibility in that the ITS requires a normalization of the computed boron concentration as a function of burnup within 60 days whereas the CTS requires the same test to be performed without any time constraints.	SR 3.1.2.2	SR 4.9
M3.1-66	Changes the distance the control rods are required to be moved to 10 or more steps every quarter to demonstrate OPERABILITY whereas the CTS does not have specific distance for rod movement.	SR 3.1.4.2	Table 4.1-2A Item 2

Table R – Relocated Specifications and Removed Details
ITS Section 3.1 – Reactivity Control Systems
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.2-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.2	LCO 3.10 and Table 3.5.2.A
A3.2-01	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	LCO 3.2	LCO 3.10
A3.2-03	Replaces CTS symbols for hot channel factors with symbols consistent with ISTS.	LCO 3.2.1 and 3.2.2	LCO 3.10.B.1, 3.10.B.2, 3.10.B.3(a), 3.10.B.3(b), 3.10.B.3(d)1, and 3.10.B.3(d)2
A3.2-05	Did not include CTS Unit 1, Cycle 19 specific requirements which are no longer applicable.	NA	LCO 3.10.B.1, 3.10.B.3(d), and 3.11
A3.2-06	Did not include CTS SR phrase "whichever occurs first" since all SRs are required to be performed regardless of which condition occurs first.	SR 3.2.1.2, 3.2.1.1, 3.2.2.1, and 3.2.2.2	LCO 3.10.B.2
A3.2-22	Clarifies CTS by adding a Note to reverify that Fwq is within limits which is consistent with the intent of the CTS.	SR 3.2.1.2	LCO 3.10.B.3.d
A3.2-23	Restates CTS descriptions of when the specification is applicable with a more precise applicability defined as MODE 1 with power > 15% RTP which consistent with the intent of CTS.	LCO 3.2.3	LCO 3.10.B.4

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.2-26	Restates CTS requirement that the AFD is outside the target band when two or more operable excore channels indicate it is outside the target band for all power levels.	LCO 3.2.3	LCO 3.10.B.4, 3.10.B.5, and 3.10.B.6
A3.2-27	Rewords CTS Action Statement to more accurately define the ranges of applicability when there is a deviation between the AFD and Target Band. This change does not make any substantive changes in plant operation.	LCO 3.2.3	LCO 3.10.B.5 and 3.10.B.6
A3.2-33	Clarifies CTS Note allowing for extending the time the indicated AFD may deviate from the Target Band without penalty deviation time during the incore/excore calibration.	LCO 3.2.3	LCO 3.10.B.6(a)
A3.2-37	Clarifies CTS by using a more precise Applicability Statement which requires QPTR limits to be met in MODE 1 with the power > 50%.	LCO 3.2.4	LCO 3.10.C.1
A3.2-38	Did not incorporate CTS requirements to "correct" the QUADRANT POWER TILT RATIO (QPTR) if not within limits because restoring a limit is always an option.	NA	LCO 3.10.C.1a
A3.2-58	Clarifies CTS by adding a note stating that other means of determining QPTR can be one or more excore nuclear channel inputs inoperable.	SR 3.2.4.2	LCO 3.10.C.4

Table L – Less Restrictive Changes
ITS Section 3.2 – Power Distribution Limits
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.2-09	Deletes CTS requirements to determine the target flux difference and $F_{\Delta H}$ following power changes of 10% or more.	SR 3.2.1.1	LCO 3.10.B.2.b	3
L3.2-17	Reduces CTS operating restrictions for placing the unit in MODE 3 when the hot channel factors are not met. The ITS requires placing the unit in MODE 2 in the same Condition.	LCO 3.2.2, Condition B	LCO 3.10.B.1	2, 4
L3.2-18	Deletes CTS requirements for placing the plant in hot shutdown within 24 hours if the hot channel limits are not met. The ITS requires a specific reduction in power level and not a shutdown.	LCO 3.2.2, Condition A	LCO 3.10.B.3.c	2, 4
L3.2-24	Deletes CTS requirement that "at least three operable excore channels" shall be within the target band for AFD. The ITS requires that the AFD shall be considered outside the target band when two or more OPERABLE excore channels indicate AFD to be outside the target band.	LCO 3.2.3	LCO 3.10.B.4, 3.10.B.6.c, and 3.10.B.7	1
L3.2-28	Increases CTS Completion Time by an additional 15 minutes to allow for correcting the AFD when operating above 90% RTP.	LCO 3.2.3, Condition C	LCO 3.10.B.5	6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.2-32	Eliminates CTS requirements to reduce the high neutron flux setpoint when the AFD deviates from the Target Band for more than 1 hour when violated for two OPERABLE excore channels.	LCO 3.2.3	LCO 3.10.B.6.b	4
L3.2-44	Eliminates CTS Action Statements addressing remedial actions, including reduction in RTP and potential reactor shutdown, when QPTR limits are not met. The ITS only requires RTP reduction and not a reactor shutdown.	NA	LCO 3.10.C.2 and 3.10.C.3	4
L3.2-50	Relaxes CTS requirements for maintaining the hot channel factor within limits at all times, except for low power Physics Testing. The ITS only requires the hot channel factor limits to be met in MODE 1.	LCO 3.2.1	LCO 3.10.B.1	2

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.2 – Power Distribution Limits
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.2-04	Relocates specific equations for determining that the hot channel factor is within limits. These equations are NRC approved equations used for determining COLR limits.	Methodology	COLR	LCO 3.10.B.1, 3.10.B.2, 3.10.B.3(a), 3.10.B.3(b), 3.10.B.3(b)2, and 3.10.B.3(d)1	3
LR3.2-34	Relocates logging details related to inoperable AFD monitor alarms.	10CFR50.59	TRM	LCO 3.10.B.9	3
LR3.2-47	Relocates the number of moveable detectors and core thermocouples to be used per quadrant for determining core QTPR when one excore nuclear channel is inoperable.	5.5.12, Bases Control Program	Bases	LCO 3.10.C.4	3
LR3.2-48	Relocates detailed information related to rod position deviation monitors and quadrant power tilt monitors OPERABILITY.	10CFR50.59	TRM	LCO 3.10.I.2 and 3.10.I.3	1, 2

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.2 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.2-08	Adds specific time requirements to determine $F_q(Z)$ within 12 hours of reaching equilibrium conditions.	SR 3.2.1.2	LCO 3.10.B.2.b
M3.2-11	Adds new SRs to determine F_{cq} and $F_n\Delta H$ are within limits.	SR 3.2.1.1 and 3.2.2.1	3.10.B.2.c
M3.2-12	Adds a specific time of 72 hours to reset the high neutron flux trip set point and requires a power reduction within 15 minutes if the hot channel factor cannot be restored to within limits.	LCO 3.2.1, Condition A	LCO 3.10.B.3.a and 3.10.B.3(b)2
M3.2-13	Adds stricter power reduction requirements to the CTS if the hot channel factor exceeds the limits in COLR. Power is required to be reduced by a percentage specified in the COLR whereas, the ITS requires the power level to be reduced to $< 50\%$ and the neutron high flux trip set point to $\leq 55\%$ for the same condition.	LCO 3.2.1, Condition A	LCO 3.10.B.3(a)
M3.2-14	Deletes the option of placing the reactor in an equilibrium configuration when the hot channel factor is not within limits.	LCO 3.2.1, Condition B	LCO 3.10.B.3.b.1
M3.2-15	Reduces the time allow to place the reactor in MODE 3 from 24 hours to MODE 2 within 6 hours when the hot channel factors exceed specific limits in the COLR.	LCO 3.2.1, Condition C and LCO 3.2.2 Condition B	LCO 3.10.B.3.a
M3.2-16	Adds new Action Statements requiring performance of specific SRs and associated Frequencies to determine the hot channel factors.	LCO 3.2.1 and 3.2.2	LCO 3.10.B.3.a and 3.10.B.3.b
M3.2-19	Adds requirements to re-verify $F_q(z)$ is within limits after $F_q(z)$ has been multiplied by the appropriate factors in the COLR.	SR 3.2.1.2	LCO 3.10.B.3.d

Table M – More Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.2-31	Adds a Completion Time of 30 minutes to correct the AFD power levels at or above 50% RTP to 90% RTP. In addition a Note is added to require completion of this Required Action once it is entered.	LCO 3.2.3, Condition C	LCO 3.10.B.6(b)
M3.2-36	Adds new SR to verify the AFD is within limits on a 7 day Frequency.	SR 3.2.3.1	NA
M3.2-39	Adds restrictions on plant operations requiring the power level to be reduced by 3% for every 1% that the QPTR exceeds 1.0 whereas the CTS only requires that core power level be reduced by 2% for every 1% that the QPTR exceeds 1.0.	LCO 3.2.4, Condition A	LCO 3.10.C.1
M3.2-41	Revises or adds remedial actions for QPTR outside limits. A new Required Action requires the determination of the QPTR once per 12 hours; replaces requirements to maintain QPTR below 1.07 and perform monitoring and logging with performing additional SRs to verify specific hot channel factors, perform additional SR to ensure that the reactor is maintained in a safe configuration, re-evaluate safety analyses and confirm validity for operation prior to increasing power, requires the excore detectors are normalized to restore QPTR to within limits prior to increasing power above the limit, and finally provides an Action for power reduction below 50% RTP within 4 hours if the new Required Actions cannot be met.	LCO 3.2.4, Condition A	LCO 3.10.C.1
M3.2-43	Adds a new SR requiring performance of a calculation every 7 days verifying that QPTR is within limit.	SR 3.2.4.1	NA
M3.2-46	Increases the SR Frequency from daily to each shift or after each 10% power change. The presentation of this test requirement has also been revised to state "Note, not required to be performed until 12 hours after core is operating above 85% power with one or more excore nuclear channel inoperable".	SR 3.2.4.2	LCO 3.10.C.4
M3.2-51	Adds new requirement to determine Fwq 12 hours after achieving equilibrium thereby, allowing the core parameters to stabilize.	SR 3.2.1.2	LCO 3.10.B.2
M3.2-52	Adds new SR Note requiring verification of heat flux channel factors at the beginning of each cycle when an equilibrium power level has been achieved.	SRs 3.2.1	LCO 3.10.B.2

Table M – More Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.2-53	Adds new requirements to perform a SR on the nuclear enthalpy rise hot channel factor within 24 hours when the measured hot channel factor is not within the COLR limits.	LCO 3.2.1 and SR 3.2.2.1	LCO 3.10.B.3.a
M3.2-54	Adds Note requiring verification of the nuclear enthalpy hot channel factor when it is not within limits.	LCO 3.2.2, Condition A	LCO 3.10.B.3.a and 3.10.B.3.c
M3.2-55	Adds new SR requirements to verify nuclear enthalpy hot channel factor prior to exceeding 75% RTP and 24 hours after reaching greater than or equal to 95% RTP.	LCO 3.2.2, Condition A	LCO 3.10.B.3.c
M3.2-56	Adds new requirements reducing power below 15% RTP within 9 hours if the AFD is not within the acceptable region or the cumulative penalty deviation time is exceeded and the Thermal power was not reduced to > 50% RTP within 30 minutes	LCO 3.2.3, Condition D	LCO 3.10.B.6.b
M3.2-57	Adds a note allowing a target flux difference to be provided after each refueling outage based on design predictions.	SR 3.2.3.2	LCO 3.10.B.2

Table R – Relocated Specifications and Removed Details
ITS Section 3.2 – Power Distribution Limits
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
R3.2-49	Relocates CTS Specification for Core Surveillance Instrumentation. This specification has been relocated because it does not meet the NRC Policy Statement TS Selection Criteria for inclusion in the TS.	TRM	10CFR50.59	LCO 3.11.A	3, 5, 6

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431.	LCO 3.3	LCO 2.3, 3.5, 3.6, 3.7, 3.8, 3.10, 3.15, 4.1, Table 3.5-1, Table 3.5-2A, Table 3.5-2B, Table 3.15-1, Table 4.1-1A, Table 4.1-1B and Table 4.1-1C
A3.3-01	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, in the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	LCO 3.3	2.3, 3.5, and 4.1
A3.3-02 ^a	Did not include a CTS reference to another section.	NA	LCO 2.3.A.3.d
A3.3-04	Reformats CTS Tables consistent with ISTS.	NA	LCO 3.5.A, 3.5.B, 3.15.B, SR 4.1.A, 4.1.B and 4.1.C
A3.3-05	Revises CTS column heading to "Required Channels" to be consistent with the ISTS.	Table 3.3.1-1 and 3.3.2-1	Table 3.5-2A and 3.5-2B

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-07	Replaces specific CTS references with ITS references.	Table 3.3.1-1, FU 1 thru 19, and 3.3.2-1, FU 1 thru 9	Tables 3.5-2A, Table 3.5-2B, and Table 3.15-1
A3.3-08	Deletes CTS general collective titles of the applicable modes. The applicable Modes are specifically defined in the Table and do not need to be described in the function title.	Table 3.3.1-1, FU 5	Table 3.5-2A Function 6 and Table 4.1-1A Function 6
A3.3-09	Clarifies CTS requirements for the time delay and time range for the degraded voltage DG start time delay.	SR 3.3.4.3	Table 3.5-1 Function 10
A3.3-14	Reformatted CTS including the RTBs have been included in a Table Function named Reactor Trip Breakers instead of their own separate Function.	Table 3.3.1-1, FU 17, and Note h	Table 3.5-2A Functions 19 and 20 Note (d) and Table 4.1-1A Functions 19 and 20, Notes 15 and 16
A3.3-18	Reformatted CTS Action Statements to be consistent with ISTS.	LCO 3.3.1, Cond B, C, D, E, F, H, J, K, L, M, N, O, and Note 1, LCO 3.3.2, Cond B, C, D, E, F, G, H, I, J, and K, LCO 3.3.4,	Table 3.5-2A, Actions 1, 4, 5, 6, 7, 8, 11, and 33 and Table 3.5-2B Actions A, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
		Cond A, B, and C	
A3.3-19	Revises CTS title for reactor trip system consistent with ISTS by deleting "and Interlock".	Table 3.3.1-1, FU 19	Table 3.5-2A Function 18 and Table 4.1-1A Function 18
A3.3-21	Replaces CTS Action Statements Mode Titles with equivalent Mode numbers. In addition, the Completion Times have been reformatted to require actions in total hours instead of specific increments. The overall times have not changed.	LCO 3.3.1, Cond B, M, O, and P and LCO 3.3.2, Cond B, C, F, and G	Table 3.5-2A, Action 1, 7, 9, and 10, and Table 3.5-2B, Action 20, 23, 25, 27, and 28
A3.3-23	Did not include CTS statement that the IRNIs channel be restored to OPERABLE prior to increasing power above P-6. This requirement is included in ITS LCO 3.0.4 which provides the same restriction.	LCO 3.0.4 and LCO 3.3.1 Cond F	Table 3.5-2A Action 3
A3.3-28	Replaces specific CTS terminology "unblocked" with "blocked" when describing the reactor trip interlocks.	Table 3.3.1-1, FU 16, 16.b.2, 16.d, and 16.e.	LCO 2.3.B.1, 2.3.B.2, 2.3.B.4, and 2.3.B.5
A3.3-29	Reformats CTS presentation of shutdown tracks consistent with ISTS format.	LCO 3.3.1 Cond B, M, N, O, and P, LCO 3.3.2, Cond B, C, F, and G	Table 3.5-2A Actions 1, 7, 8, 9, and 10 and Table 3.5-2B Actions 20, 23, 25, and 28

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-34	Reformatted CTS requirements for inoperable RTBB to be OPERABLE prior to placing in service consistent with ISTS.	SR 3.3.1.4 Note 1	Table 3.5-2A Action 10
A3.3-35	Revises CTS title, "Automatic Actuation Relay Logic" to more accurately reflect PI design.	Table 3.3.2-1, FU 2, 2b, 3b, 4b, and 5b Table 3.3.5-1	Table 3.5-2B Functions 1e, 2c, 3.e, 4.f, 5e, 6d, and 7f Table 4.1-1B FU 1e, 2c, 3c, 4f, 5e, 6d, and 7f.
A3.3-38	Reformats CTS Note to be consistent with ISTS meaning that the function is not required below 2000 psig in the RCS.	Table 3.3.2-1, Note a	Table 3.5-2B note a and Table 4.1-1B Note 21
A3.3-39	Reformats CTS Note consistent with ISTS requiring the function of CVI OPERABLE during containment integrity and movement of irradiated fuel.	Table 3.3.5-1, Notes a, b, and Applicability	Table 3.5-2B Note b and Table 4.1-1B Note 26
A3.3-43	Reformats CTS Note restating the Applicability for when both MSIVs are closed.	Table 3.3.2-1 Note c	Table 3.5-2B note c and Table 4.1-1B Note 23
A3.3-47	Revises CTS Function Title deleting "4.16 kV" since it is redundant information.	Table 3.3.2-1, FU 6	Table 3.5-2B Function 7
A3.3-48	Clarifies CTS with wording consistent with ISTS.	Table 3.3.2-1, Note G	Table 3.5-2B Footnote and Table 4.1-1B

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-50	Revised CTS consistent with LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System."	NA	Table 3.5-2B Function 9 Action 34, 35, and 36
A3.3-51	Reformats CTS requirements from being subdivided into the turbine driven AFW and the motor driven AFW.	Table 3.3.2-1, FU 6e	Table 3.5-2B and Table 4.1-1B Function 7d
A3.3-54	Restates CTS required actions for systems normally blind flanged and not operating.	LCO 3.3.5, Cond B and C	Table 3.5-2B, Action 22
A3.3-55	Did not include CTS statement allowing one channel to be bypassed for up to 8 hours for surveillance testing since this is included with the AFW logic testing.	LCO 3.3.1, Condition I	Table 3.5-2B, Action 30
A3.3-62	Did not include CTS specific Objective statements which did not provide any technical requirements.	LCO 3.3.3	LCO 3.15
A3.3-63	Restates CTS requirements allowing the plant to start up with inoperable EM equipment.	LCO 3.3.3, Actions	LCO 3.15.C
A3.3-65	Restates CTS using ISTS descriptive terminology "Penetration Flow Path."	Table 3.3.3-1, FU 9	Table 3.15-1 Function 9
A3.3-66	Did not include unnecessary CTS descriptive verbiage.	Table 3.3.1-1, FU 15 and Table 3.3.3, Note c	Table 3.15.1 Action 5, 15, and 16 Note c
A3.3-68	Clarifies CTS adding a Note in the EM Table that each core exit thermocouple is a channel.	Table 3.3.1-1 Note c	NA

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-69	Clarifies CTS by providing a direction for operators to follow if they do not comply with specific Completion Times.	LCO 3.3.3, Cond H	NA
A3.3-72	Did not include CTS column title of Functional Test since this test has been replaced by other tests i.e., TADOT, COT, or ALT.	Table 3.3.1-1, FU 1 thru 19	Table 4.1-1A, FU 1 thru 20 and 4.1-1B, and 4.1-1C
A3.3-75	Restate CTS requirements for SRs for the calibration of the Power Range Neutron Flux High Setpoint.	Table 3.3.1-1, FU 6, 7, and 20	Table 4.1-1A Functions 2a, 7, and 8.
A3.3-81	Clarifies CTS requirements that setpoint verification is not required for the quarterly SR of the 4 kV RCP Bus undervoltage and underfrequency.	Table 3.3.1-1, FU 11 and 12	Table 4.1-1A Functions 15 and 16b
A3.3-84	Clarifies CTS requirements for response time testing of the automatic trip logic and reactor trip breakers.	Table 3.3.1-1, FU 17 and 19	Table 4.1-1A Functions 18 and 19
A3.3-85	Did not include CTS format for Frequency notations not included in the ISTS.	LCO 3.3	Table 4.1-1A, Table 4.1-1B and Table 4.1-1C
A3.3-94	Did not include unnecessary CTS descriptive wording.	SR 3.3.1.11, Note	Table 4.1-1A Note 7
A3.3-95	Restates CTS requirements for STAGGERED TEST BASIS consistent with ISTS.	SR 3.3.1.4, 3.3.1.5, and 3.3.2.2	Table 4.1-1A Note 9 and Table 4.1-1B Note 22

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-107	Did not include CTS Note referencing a specific Specification since it is no longer applicable.	NA	Table 4.1-1B Note 25
A3.3-109	Clarifies CTS by adding a Note requiring verification of the setpoint is not required by this SR.	SR 3.3.2.4, Note	NA
A3.3-114	Incorporated LAR, "Removal of Boric Acid" into the CTS.	NA	Table 4.1-1C Functions 5, 7, 9 and 12 and Note 33
A3.3-123	Did not include CTS Notes due to ISTS format.	NA	Table 4.1-1C Notes 35, 36, and 37
A3.3-126	Restates CTS references for TS 3.11 to ITS 3.2.4.2.	LCO 3.3.1, Cond D	LCO 3.10.C.4
A3.3-128	Clarifies CTS requirements that two automatic trip logic and reactor trip breakers are to be OPERABLE with the input to the RTS from each train considered to be a channel..	Table 3.3.1-1, FU 15, 17, and 19	Table 3.5-2A Function 17, 18 and 19
A3.3-130	Revises the CTS definition of the nomenclature and the values for f(Δ I) consistent with ISTS.	Table 3.3.1-1, FU 6, Note 1	LCO 2.3.A.2.d and 2.3.A.2.e
A3.3-133	Restates CTS requirements that undervoltage is a percentage of normal voltage to undervoltage is a percentage of rated bus voltage.	Table 3.3.1-1, FU 11a and 11b	LCO 2.3.A.2.g
A3.3-134	Clarifies CTS instrumentation ranges for measuring high pressurizer water level and low low steam generator water level which are specified as a percentage of narrow range.	Table 3.3.1-1, FU 9 and 13	LCO 2.3.A.3.a and 2.3.A.3.b

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-141	Restates CTS SR that a COT be performed on intermediate range and source range neutron instrumentation prior to reactor startup following each shutdown in excess of 2 days. The ITS requires the same SR Frequency only specified as 48 hours instead of a 2 days.	SR 3.3.1.8	Table 4.1-1A Notation 4
A3.3-142	Clarifies CTS applicability by specifically stating that once the plant is in Mode 3, the MSIVs can be shut thus exiting the Mode of Applicability which is consistent with ISTS.	LCO 3.3.2, Condition G	Table 3.5-2B Action 25
A3.3-143	Clarifies CTS requirements that the neutron detectors are excluded from CHANNEL CALIBRATION. This is consistent with current PI practices and ISTS requirements.	SR 3.3.3.1, 3.3.3.2, and LCO 3.3.5	Table 4.1-1C Footnote 41 and FU 23
A3.3-144	Restates CTS requirements for submitting a report to the NRC.	5.6.8, LCO 3.3.3, Cond C and J	Table 3.15 Action (a)1 and 3
A3.3-146	Clarifies CTS requirements ensuring that with one or more trains of radiation monitoring inoperable, operation may continue provided that the containment inservice purge supply and exhaust valves are closed.	LCO 3.3.5, Cond A and B	Table 3.5-2B, Action 22
A3.3-147	Reformats CTS requirements for CVI instrumentation.	LCO 3.3.5	LCO 3.6.D.2.c
A3.3-148	Restates CTS actions requiring that with one or more inservice purge Functions inoperable, enter applicable Conditions and Required Actions of LCO 3.6.3 for containment inservice purge valves made inoperable by isolation instrumentation.	LCO 3.3.5, Condition B	LCO 3.6.D.2.d
A3.3-149	Reformatted CTS consistent with ISTS wording.	LCO 3.3.5 and Applicability	LCO 3.8.A.1.j
A3.3-150	Clarifies CTS requirements by adding a Note stating that separate condition entry is allowed for each Function. This is consistent with PI current intent.	LCO 3.3.4, Condition A	Table 3.5-2B, Function 8.

Table A – Administrative Changes
ITS Section 3.3 – Power Distribution Limits
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.3-151	Clarifies CTS intent that if the automatic load sequencers are inoperable, specific actions are required to be taken.	LCO 3.3.4	Table 3.5-2B, Function 8
A3.3-155	Clarifies CTS requirements that the neutron detectors are excluded from response time testing.	Table 3.3.1-1, FU 2a, 2b, 3a, 3b, 5, 6, and 7 SR 3.3.1.16, Note	Table 4.1-1A Functions 2a, 2b, 3a, 5, 6, and 7

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-13	Revises CTS MODES of Applicability to be consistent with NUREG-1431, Rev. 1.	Table 3.3.1-1, FU 8a, 8b, 9, 10, 11, 12, 13, 14, notes e, f, and g LCO Cond B, D, I, K, M, and N	Table 3.5-2A, Action 1, 6, and Table 4.1-1A Functions 9, 11, 12, 13, 15, and 16	1
L3.3-22	Eliminates CTS requirement to enter LCO 3.0 C rather, the ITS provides specific Required Actions to be performed instead of a reactor shutdown upon entry into the subject Condition.	LCO 3.3.1, Cond D and E LCO 3.3.2, Cond D, E, and H	Table 3.5-2A, Action 2 and 6, Table 3.5-2B Actions 21, 24, and 29 And LCO 3.0.C	2, 9

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-24	Relaxes CTS requirements for restoring an inoperable intermediate range nuclear instrument channel to operable prior to increasing power above P-10 when the plant power level is between P-6 and P-10. The ITS requires that one intermediate range neutron flux channel is inoperable, the plant reduce power below the P-6 setpoint or requires the plant to increase power above P-10.	LCO 3.3.1 Cond D	Table 3.5-2A Paragraph (b)	4
L3.3-25	Eliminates CTS requirement to enter LCO 3.0 C for a single inoperable channel of neutron flux instruments. The ITS provides specific Required Actions to be performed instead of a reactor shutdown upon entry into the subject Condition.	LCO 3.3.1 Cond G	Table 3.5-2A Action 3 and LCO 3.0.C	4, 9
L3.3-30	Relaxes CTS requirements on stopping all operations involving positive reactivity changes when one source range neutron flux channel is inoperable. The ITS allows cooldown or boron dilution activities to continue as long as the reactivity is accounted for in the SDM.	LCO 3.3.1 Cond H	Table 3.5-2A Action 4	4
L3.3-31	Replaces CTS instrument setpoint values to be consistent with established allowable values consistent with the PI setpoint methodology. In many cases, the ITS values are less restrictive than what is contained in the CTS.	Table 3.3.1- 1, FU 2a, 3a, 3b, 8a, 8b, 10, 12, 16.b.2, 16.c, 16.d, 16.e, Table 3.3.2- 1 FU 6d, Table 3.3.3-	LCO 2.3.A.2.a, 2.3.A.2.b, 2.3.A.2.c, 2.3.A.2.g, 2.3.A.2.i, 2.3.B.2.b, 2.3.B.3, 2.3.B.4,	

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
		2 FU 1d, and 4c	Table 3.5-1, FU 3 and 5	
L3.3-33	Relaxes CTS Completion Time by one hour to restore an inoperable breaker to OPERABLE prior to initiating a plant shutdown.	LCO 3.3.1 Cond P	LCO 3.0.C and Table 3.5-2A Action 9 Part b and Action 10	6
L3.3-36	Eliminates CTS requirement for the automatic initiation of SI on a high containment pressure in Mode 4.	Table 3.3.2-1	Table 3.5-2B, FU 1e and Table 4.1-1B Function 1b and 2b	4
L3.3-37	Eliminates CTS requirement for the automatic initiation of containment spray on high containment pressure in Mode 4.	Table 3.3.2-1, FU 2c	Table 3.5-2B, FU 2b and Table 4.1-1B Function 2b	4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-42	Relaxes CTS requirements from requiring the MSIVs to be OPERABLE in Mode 2 for each subfunction of steam line isolation to not requiring this specification to be applicable when both MSIVs are closed.	Table 3.3.2-1, FU 4a, 4b, 4c, 4d, and 4e	Table 3.5-2B, FU 5 and Table 4.1-1B Function 5	1, 2
L3.3-45	Relaxes CTS requirements from requiring the Applicability in Mode 2 for each subfunction of feedwater isolation to not being applicable when all MFRVs and MFRV Bypass valves are closed and de-activated or isolated by a manual valve.	Table 3.3.2-1, FU 5a, 5b, 5c, and Note e	Table 3.5-2B, FU 6 and Table 4.1-1B Function 6, Note 29	1, 2
L3.3-53	Relaxes CTS requirements by allowing the radiation monitoring system to continue to operate for up to 4 hours with one train inoperable.	LCO 3.3.2, Cond A and B	Table 3.5-2B Action 22	4, 6
L3.3-67	Relaxes CTS requirements by allowing credit for a check valve with flow through the valve secured providing a containment leakage prevention barrier.	Table 3.3.3-1 Note a	Table 3.15-1 Note b	1, 4
L3.3-74	Eliminates CTS requirements for performing a response time test on the intermediate range neutron flux instrumentation each refueling.	Table 3.3.1-1, FU 4	Table 4.1-1A Function 5	3

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-82	Eliminates CTS requirements to calibrate the RCP breaker open function every refueling outage.	NA	Table 4.1-1A Function 16	3
L3.3-83	Relaxes CTS Frequency for testing the RCP breaker open trip instrumentation every 24 months instead of every shutdown in excess of 2 days.	Table 3.3.1-1, FU 11	Table 4.1-1A Function 16	3, 10
L3.3-86	Relaxes CTS Frequency from performing the SR prior to each startup following shutdown in excess of 2 days if not done in the previous 30 days to be performed prior to each startup if not done in the previous 92 days and every 92 days thereafter.	SR 3.3.1.8	Table 4.1-1A Notes 4 and 17	3, 10
L3.3-113	Replaces CTS weekly check of RWST level instrumentation with a monthly check. Also monthly functional test was deleted.	Table 3.3.3-1	Table 4.1-1C Function 8	3, 10
L3.3-117	Eliminates CTS requirement for the OTΔT and OPΔT functions being calibrated or OPERABLE in Mode 3.	NA	Table 4.1-1C Function 18 and Note 34	3, 10
L3.3-118	Eliminates CTS SRs for the hydrogen monitor channel check, calibration, and functional testing.	NA	Table 4.1-1C, FU 29	3

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-125	Relaxes CTS requirements for verification of the core quadrant power balance daily and 10% power changes when one excore nuclear channel is inoperable and power above 85% to verify core quadrant power balance every 12 hours.	LCO 3.3.1, Condition D	LCO 3.10.C.4	3, 10
L3.3-129	Relaxes CTS requirements which limits the applicability in Mode 2 to above P-6 instead of only Mode 2.	Table 3.3.1-1, FU 4 Note c, and Note k	Table 3.5-2A, FU 5 and Table 4.1-1A Function 5	2, 4
L3.3-132	Eliminates CTS column titles and associated limits for the "Channels to Trip" and "Minimum Channels Operable." This change is based on the new ISTS format.	Table 3.3.1-1 and Table 3.3.2-1	Table 3.5-2A and 3.5-2B	4
L3.3-135	Eliminates CTS requirements to enter LCO 3.0.C for two source range neutron flux channels inoperable. The ITS provides specific Required Actions to avoid an unnecessary reactor shutdown.	LCO 3.3.1 Cond I	Table 3.5-2A, Action 4 and LCO 3.0.C	4, 6, 10
L3.3-136	Relaxes CTS requirements for RTB being opened when one manual trip channel or one source range neutron flux channel is inoperable. The ITS provides specific actions to initiate action to fully insert all rods and place the rod control system in a condition incapable of rod withdrawal.	LCO 3.3.1 Cond C and J	Table 3.5-2A Action 5 and 8	4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-137	Relaxes CTS requirements for a core quadrant power balance to be performed when a power range neutron flux channel is inoperable and RTP is above 85%. The ITS only requires a determination that the core quadrant power balance when the power range neutron flux input to QPRT is inoperable.	LCO 3.3.1 Cond D	Table 3.5-2A Action 2c	4
L3.3-138	Relaxes CTS requirements for a quarterly verification in Modes 3, 4, and 5 that P-6 and P10 are in their required state with a COT on the source range neutron flux instrumentation. The ITS only requires verification that P-6 and P-10 are in their required state for existing plan conditions associated with the COT on power range.	Table 3.3.1-1, FU 5	Table 4.1-1A Function 6b	3, 10
L3.3-168	Relaxes CTS SR requirements for performing a CHANNEL CALIBRATION for the radiation monitors for Containment Purge System Frequency from prior to CORE ALTERATIONS to 24 months.			

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.3-46	Relocates CTS details for AFW manual initiation function.	10CFR50.59	TRM	Table 3.5-2B, FU 7 and Table 4.1-1B, Function 7a	1, 2, 3
LR3.3-96	Relocates CTS descriptive information for verification and performance of permissives.	5.5.12, Bases Control Program	Bases	Table 4.1-1A, Note 10	2, 3
LR3.3-101	Relocates CTS notes detailing "what and how" SRs are performed on the undervoltage and shunt trip mechanisms.	5.5.12, Bases Control Program	Bases	Table 4.1-1A, Notes 13 and 14	3
LR3.3-102	Relocates CTS details for the quadrant power tilt monitor alarm function in the control room.	10CFR50.59	TRM	Table 4.1-1A, Note 18	2
LR3.3-112	Relocates CTS details for the RHR pump flow function.	10CFR50.59	TRM	Table 4.1-1C, Function 6	1, 2
LR3.3-116	Relocates CTS details for channel check and functional testing requirements for the Coolant Flow RTD Bypass Flowmeter.	10CFR50.59	TRM	Table 4.1-1C, Function 18	3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.3 – Instrumentation
(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.3-127	Relocates CTS details for reactor coolant flow SR to be performed specifically at elbow taps.	5.5.12, Bases Control Program	Bases	LCO 2.3.A.2.f	1, 2
LR3.3-131	Relocates CTS descriptive information for the f delta I Function.	5.5.12, Bases Control Program	Bases	LCO 2.3.A.2.d	2, 3
LR3.3-139	Relocates CTS descriptive information for a single point comparison of incore to excore nuclear instrumentation for axial off-set.	10CF50.59	USAR	Table 4.1-1A, Note 6	2
LR3.3-154	Relocates CTS details in accordance with LAR.	NA	NA	Table 3.5-2B Function 6C and Table 4.1-1B Function 6C	2
LR3.3-156	Relocates CTS notes detailing "what and how" SRs are performed on the undervoltage and shunt trip mechanisms.	5.5.12, Bases Control Program	Bases	Table 4.1-1C Functions 15, 26, 27, and 28	3
LR3.3-157	Relocates CTS details for Containment Temperature Monitors.	10CFR50.59	TRM	Table 4.1-1C Function 30	2

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.3 - Instrumentation
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.3-12	Adds new requirements for when one or more Control Rods are not fully inserted.	Table 3.3.1-1, Note a	Table 3.5-2A Note a, Table 4.1-1 Note 1, Table 3.5-2A Note a, and Table 4.1-1A Note 1
M3.3-15	Adds a new Function to the CTS for the RTS interlocks, number of OPERABLE channels, Applicable MODES, Required Actions, and Surveillance Testing.	Table 3.3.1-1, FU 16 and LCO 3.3.1 Cond Q, R, and S	Table 3.5-2A and Table 4.1-1A Function 16
M3.3-16	Adds new requirements and operational constraints for RTB Undervoltage and Shunt Trip Mechanism.	Table 3.3.1-1, FU 17 and 18	Table 3.5-2A and Table 4.1-1A Function 19
M3.3-17	Modifies CTS Note providing additional restrictions for the reactor trip system OPERABILITY under specific plant conditions.	Table 3.3.1-1, Note h	Table 3.5-2A Note d and Table 4.1-1A Note 16
M3.3-26	Adds new Required Action to CTS to address when two source range neutron flux channels are inoperable.	LCO 3.3.1 Cond I	Table 3.5-1A, Action 4

Table M – More Restrictive Changes
ITS Section 3.3 –Instrumentation
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.3-32	Reduces CTS Completion Time to repair a diverse trip feature, place the breaker in bypass, or declare it inoperable from 48 hours to 6 hours.	Table 3.3.1-1 and LCO 3.3.1, Cond J and P	Table 3.5-2A Action 9
M3.3-40	Adds a new Allowable Value for the HI-HI Steam Generator Level to the CTS.	Table 3.3.2-1, FU 5b	Table 3.5-1 Function 11
M3.3-49	Adds new Mode of Applicability to the CTS requiring the feedwater isolation logic to be OPERABLE in MODE 3. The CTS does not have this Applicability.	Table 3.3.2-1, FU 5a	Table 3.5-2B Function 6d
M3.3-52	Adds new Applicability of "When associated DG is required to be OPERABLE by LCO 3.8.2, 'AC Sources – Shutdown' " to the CTS for the loss of power function.	LCO 3.3.4, Condition B	Table 3.5-2B Function 8
M3.3-57	Revises CTS Action Statement to take specific actions, thus affecting more equipment, when three channels per bus of degraded voltage or undervoltage are inoperable.	LCO 3.3.4, Cond C	Table 3.5-2B Action 33
M3.3-59	Adds new specification to the CTS for the DG load sequencers.	LCO 3.3.4, Condition B	LCO 3.7.A
M3.3-60	Adds new requirements to CTS to reduce power to Mode 4 within 18 hours or shutdown.	LCO 3.3.2, Cond G	Table 3.5-2B, Action 28
M3.3-61	Adds new Required Actions to the CTS for an inoperable DG load sequencer.	LCO 3.3.4 Conditions C and D	Table 3.5-2B, Action 33
M3.3-64	Eliminates CTS exception for not entering LCO 3.0.C. Elimination of this exception may require additional plant shutdowns.	LCO 3.3.3	LCO 3.0.C and 3.15.D

Table M – More Restrictive Changes
ITS Section 3.3 –Instrumentation
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.3-73	Increases CTS Frequency of performing a COT for power range, neutron flux-low, intermediate range, and source range instrumentation from no specific time to 12 hours.	Table 3.3.1-1, FU 2b, 4, and 5 SR 3.3.1.8 Note	Table 4.1-1A Function 2b, 5, 6a, and Note 10.
M3.3-87	Reduces CTS Frequency for the performance of the SR if the reactor goes to Mode 3 if not performed within the previous 31 days. The CTS only requires the SR if the unit was shutdown for more than 2 days.	SR 3.3.1.15	Table 4.1-1A Note 4
M3.3-88	Revises CTS Note to require performance of SR within 72 hours after RTP exceeds 15% and every 31 EFPD. The CTS does not provide any specific time to perform the SR.	SR 3.3.1.3	Table 4.1-1A Note 6
M3.3-91	Revises CTS Note requiring the SR to be performed within 12 hours of reaching 15%. The CTS does not have a specific time limit.	SR 3.3.1.2	Table 4.1-1A Note 5
M3.3-92	Revises CTS Note requiring performance of SR within 24 hours of reaching specific RTP. The CTS does not require any specific time to perform the SR.	SR 3.3.1.6	Table 4.1-1A Note 8
M3.3-105	Adds a new Note to CTS requiring verification that the time constants associated with the instrumentation are adjusted to prescribed values. The CTS does not require this SR.	SR 3.3.1.10 Note and SR 3.3.2.6 Note	Table 4.1-1A and 4.1-1B
M3.3-106	Adds restriction to CTS Mode of Applicability for the Feedwater Isolation Logic to Mode 3 except when the MFRVs and MFRV Bypass valves are closed.	Table 3.3.2-1	Table 4.1-1B Function 6d
M3.3-108	Adds new requirements to CTS for the reactor trip bypass breaker to be tested prior to placing it in service.	SR 3.3.1.4 Note	Table 4.1-1A note 16
M3.3-145	Reduces CTS Frequency from 24 hours to 12 hours for performing a channel check.	Table 3.3.5-1	Table 4.1-1B Function 4e

Table M – More Restrictive Changes
ITS Section 3.3 –Instrumentation
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.3-159	Adds new Specification to CTS for Control Room Special Ventilation System.	LCO 3.3.6	NA
M3.3-160	Adds new Specification to CTS for Spent Fuel Pool Special Ventilation System.	LCO 3.3.7	NA
M3.3-170	Adds new requirement to CTS to reduce power to Mode 4 for inoperable steam line isolation – manual channel.	LCO 3.3.2 Cond F	Table 3.5-2B Action 27
M3.3-171	Adds SR requirements to CTS for testing master and slave relays.	Table 3.3.1-1, SR 3.3.2.2, 3.3.2.7, and 3.3.2.8	Table 4.1-1B Function 1e, 2c, 3c, 5e, 6d, and 7f.
M3.3-172	Increases the CTS Allowable Value for the steam generator low-low level in accordance with Westinghouse NSAL 02-3.	Table 3.3.2-1, FU 6b and Table 3.3.1-1, FU 13	LCO 2.3.A.3.b

Table R – Relocated Specifications and Removed Details
ITS Section 3.3 – Instrumentation
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
R3.3-03	Relocates CTS Specification for Control Rod Stops.	TRM	10CFR50.59	LCO 2.3.C	1, 2
R3.3-115	Relocated various instruments in accordance with an approved LAR.	USAR	10CFR50.59	Table 4.1-1C Functions 13, 16, 17, 19, 20 and 31.	2, 6
R3.3-152	Relocated specific Functions for high temperature vent ducts.	TRM	10CFR50.59	Table 3.5-1 Function 8 and Table 4.1-1C Function 24	2, 6

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Relocated Redundant Requirements
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.4 – Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.4-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.4	LCO 3.1, 3.3, 3.10, Table 4.1-2A, Table 4.1-2B, Table 4.1-1C, 4.3 and 4.6
A3.4-03	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	LCO 3.4	LCO 3.1 and 4.3
A3.4-08	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY. The plant Modes to which this specification apply have not changed.	LCO 3.4	LCO 3.1.A.1.a(2), 3.1.A.1.b(1), 3.1.A.1.b (2), 3.1.A.1.c(1), 3.1.A.1.c(3), 3.1.A.1.d, 3.1.A.2.a(1), 3.1.A.2.a(2), 3.1.A.2.a(3), 3.1.A.2.b(1), 3.1.A.2.c(1), 3.1.A.2.c(1)(a), 3.1.A.2.c(1)(b), 3.1.A.2.c(1)(b)3, 3.1.B.1.b, 3.1.C.1, 3.1.C.2, 3.1.C.2.d, 3.1.C.3, 3.1.D.2, 3.1.D.2.a, 3.1.D.2.b, 3.10.J and 4.3.

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.4-14	Did not include CTS statement that "STARTUP OPERATION which is duplicative to ITS general rules for use and applicability governing how the plant may operate. Among these rules is Specification 3.0.4 which, unless specifically excepted, does not allow the plant to startup with inoperable TS required equipment.	NA	LCO 3.1.A.1.b(2), 3.1.A.2.a(2), 3.1.A.2.b(1) and 3.1.A.2.c(1)(b)
A3.4-18	Did not include CTS actions which are defined by the format of ITS.	NA	LCO 3.1.A.1.b(3)
A3.4-22	Did not include CTS requirements for the plant to shut down which are provided by ITS format.	NA	LCO 3.1.A.1.b(3)
A3.4-28	Divides CTS Specification requiring two methods of cooling the RCS to be operable with one in operation when in MODE 4 and MODE 5, loops filled into two separate Specifications.	LCO 3.4.7	LCO 3.1.A.1.c
A3.4-39	Revises CTS format to be consistent with the ITS. The format for CTS and ITS fundamentally differ in the presentation of shutdown tracks but the Completion Time requirements are the same.	LCO 3.4.3, LCO 3.4.9, Conditions A, B, and C, LCO 3.4.11, Conditions D, E, and G, LCO 3.4.14, Conditions B, C, and D, and LCO 3.4.15	LCO 3.1.A.2.a(2). 3.1.A.2.a(3), 3.1.A.2.c.(1)(b)(1), 3.1.A.2.c.(1)(b)(3), 3.1.B.1.b and 3.1.C.2
A3.4-46	Incorporates CTS allowance for pressurizer safety valves to be 2485 psig \pm 3% when tested for operability.	LCO 3.4.10	LCO 3.1.A.2.b (1)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.4-49	Did not include CTS required action since it is included based on ITS format.	NA	LCO 3.1.A.2.c (1)(b)(1), 3.1.A.2.c(1)(b)(3), 3.1.A.2.c(1)(b)(4), and 3.1.A.2.c(1)(b)(5)
A3.4-61	Revises CTS requirements for maintaining RCS pressure and temperature limits by dividing them into two sets of action statements. This change also includes changing to the NUREG-1431 use of MODES to define plant conditions rather than use of prose descriptions. These are editorial and format changes and do not change PI operating practices or intent.	LCO 3.4.3	LCO 3.1.B.1.b
A3.4-71	Clarifies CTS requirements to immediately enter into LCO 3.0.3, which is the appropriate action if no leakage detection instrumentation is OPERABLE. This is consistent with current PI practices.	LCO 3.4.16	LCO 3.1.C.1 and 3.1.C.2.d
A3.4-73	Clarifies CTS LEAKAGE requirements making it consistent with the ITS definition of LEAKAGE. This change is consistent with PI current operating practices.	LCO 3.4.14, Conditions A and C	LCO 3.1.C.2.a
A3.4-77	Did not include CTS requirements since it is included in the ITS format.	NA	LCO 3.1.C.2.d
A3.4-78	Revises CTS requirements for inservice steam generator tube inspection to include in ITS Section 5.5. No technical changes are associated with this change.	3.4.14, Condition D and SR 3.4.14.2	LCO 3.1.C.2.e and SR 4.12
A3.4-83	Clarifies CTS Applicability to be consistent with the ITS format.	LCO 3.4.12 and 3.4.13	LCO 3.3.A.3 and 3.3.A.4
A3.4-99	Revises CTS SR Frequency general statement from prior to resuming power after each refueling to every 24 months.	SR 3.4.15.1	SR 4.3

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No	Summary	ITS Section	CTS Section
A3.4-100	Clarifies CTS requirements for RCS total flow rate. Only editorial changes were made and no parameter, technical or operational changes made.	SR 3.4.1.4	LCO 3.10.J
A3.4-102	Replaces CTS statement, "whenever the reactor coolant system average temperature is below 350 F" with the ITS equivalency of MODE 4. The temperature limit of 350 F in the CTS is the same as ITS Mode 4.	LCO 3.4.6	LCO 3.1.A.1.c (1)
A3.4-103	Replaces CTS statement, "whenever the reactor coolant system average temperature is below 350 F" with the ITS equivalency of MODE 5 with RCS loops filled. The temperature limit of below 350 F in the CTS is enveloped in the ITS Mode 5 with RCS loops filled.	LCO 3.4.11	LCO 3.1.A.1.c (1)
A3.4-104	Editorially revises CTS action statement for only one OPERABLE method of removing decay heat. The actions are the same in both CTS and ITS .	LCO 3.4.12 and 3.4.13	LCO 3.1.A.1.c (2)
A3.4-105	Editorially revises CTS shutdown requirements with one method of decay heat removal inoperable. The Actions and Completion Times in both the CTS and ITS are the same, no technical or operational changes have been made to this requirement.	LCO 3.4.12 and 3.4.13	LCO 3.1.A.1.c (2)
A3.4-106	Editorially revises CTS requirement with no methods of removing decay heat. CTS and ITS actions and Completion Times remain the same.	LCO 3.4.13	LCO 3.1.A.1.c (3)
A3.4-107	Editorially revises CTS requirements for defining the acceptable methods for removing decay heat. CTS and ITS allow the use of the same decay heat removal system or a combination of the two to meet the LCO requirements.	LCO 3.4.11	LCO 3.1.A.1.c (1)
A3.4-110	Clarifies intent of CTS requirements by adding a note stating that the Required Actions do not have to be entered if sole reason for the block valves being declared inoperable is a result of power being removed to comply with other Required Actions. No operational or technical changes are associated with this change.	LCO 3.4.11	LCO 3.1.A.2.c (1) and 3.1.A.2.c(1)(b)(4)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.4-111	Clarifies intent of CTS requirements by adding a Note that with both block valves inoperable, restore one block valve to OPERABLE status within 2 hours, if sole reason for the block valves being declared inoperable is a result of power being removed to comply with other Required Actions. No operational or technical changes are associated with this change.	LCO 3.4.11	LCO 3.1.A.2.c (1)(b)(5)
A3.4-112	Clarifies CTS requirements that the Primary System Leakage be evaluated daily, but not required to be performed until 12 hours after establishment of steady state operation. Performance of this SR at steady state conditions is standard PI operating practice and consistent with the intent of the CTS.	SR3.4.14.1	Table 4.1-2A Item 9
A3.4-113	Clarifies CTS requirements by adding a Note stating that the SR is to be performed in MODES 1 and 2 for the Pressurizer PORV Block. Performance of this SR in MODE 3 is standard PI operating practice and consistent with the intent of the CTS.	SR 3.4.11.1	Table 4.1-2A Item 6
A3.4-114	Clarifies CTS requirements by adding a Note stating that the SR is to be performed in MODES 1 and 2 to functionally test the PORVs. Performance of this SR in MODE 3 is standard PI operating practice and consistent with the intent of the CTS.	SR 3.4.11.2	Table 4.1-2A Item 7
A3.4-120	Editorially revises CTS requirements that two methods of decay heat removal be OPERABLE when the reactor is in MODE 5. With only one OPERABLE method of removing decay heat, initiate prompt action to restore two OPERABLE methods of removing decay heat. The ITS requires two loops of decay heat removal be OPERABLE when the reactor is in MODE 5. With one required loop inoperable and one RHR loop OPERABLE, immediately initiate action to restore a second loop to OPERABLE status. Since the only changes were editorial, the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.11 and 3.4.12	LCO 3.1.A.1.c (2)
A3.4-121	Editorially revises CTS requirements for two methods of decay heat removal be OPERABLE when the reactor is in MODE 5. These changes were editorial; the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.11 and 3.4.12	LCO 3.1.A.1.c (2)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.4-122	Editorially revises CTS Required Actions with no methods of removing decay heat. These changes were editorial; the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.13	LCO 3.1.A.1.c (3)
A3.4-124	Editorially revises CTS requirement by combining the SR and Footnote and replacing power operation with MODE 1.	SR 3.4.17.3	Table 4.1-2B Item 3
A3.4-125	Editorially revises CTS requirement for performing this SR at reactor power with MODE 1.	SR 3.4.17.2	Table 4.1-2B Item 2
A3.4-127	Did not include CTS requirements that reactor vessel head be removed. This flexibility exits the specification Applicability as defined in ITS.	NA	LCO 3.3.A.3(b)

Table L – Less Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-02	Relaxes CTS requirements by deleting the limitation for the pressurizer pressure limits during an increase in power. The ITS applies this limit to both increasing and decreasing power.	LCO 3.4.1	LCO 3.10.J	2
L3.4-05	Increases CTS Completion Time from 4 to 6 hours for reducing power to MODE 2.	LCO 3.4.1	LCO 3.10.J	6
L3.4-16	Increases the CTS Completion Time from 6 hours to 12 hours for reducing RCS temperature below 350 F, if an inoperable reactor coolant loop cannot be restored to OPERABLE.	LCO 3.4.5, Conditions A and B	LCO 3.1.A.1.b(2)	6
L3.4-36	Relaxes CTS requirements allowing one RHR loop to be inoperable for surveillance testing while the other RHR loop is OPERABLE and in operation.	LCO 3.4.7 and 3.4.8 Note 2	LCO 3.1.A.1.d	1, 3, 4
L3.4-47	Eliminates CTS requirement for one pressurizer safety valve to be operable when the head is on the reactor vessel.	NA	LCO 3.1.A.2.b (2)	1
L3.4-48	Eliminates CTS requirement for the PSVs to meet the LCO lift setting limits in MODE 3, when the plant is starting up, to allow adjusting the settings under hot conditions.	LCO 3.4.10 Note	LCO 3.1.A.2.b (1)	2, 3, 4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-50	Increases CTS Completion Time from 8 hours to 12 hours to place the plant in MODE 5 when the RCS temperature is greater than the SI pump disable temperature and less than the OPPS enable temperature.	LCO 3.4.12, Conditions D and E	LCO 3.1.A.2.c (2)(a) and 3.1.A.2.c.(2)(b)	6
L3.4-68	Relaxes CTS requirements of requiring a plant shutdown in the event that one of the means of leakage detection were inoperable. The ITS provides specific Required Actions and remedial actions in the event one or both means of leakage detection are inoperable and not just requiring a plant shutdown.	LCO 3.4.16, Conditions A, B, C, and D	LCO 3.1.C.1	4, 6
L3.4-79	Relaxes CTS Completion Time from 1 hour to 4 hours to isolate the flow path of a PIV with leakage outside the allowed limits and 72 hours to restore the PIV to within limits.	LCO 3.4.15, Condition C	LCO 3.1.C.3	4, 6
L3.4-82	Eliminates CTS requirements for RCS specific activity limits when the RCS temperature is below 500 F and above cold shutdown.	NA	LCO 3.1.D.3 and Table 4.1-2B Item 4a	2, 4
L3.4-86	Increases CTS SR interval from 18 to 24 month interval for PORV functional testing and emergency pressurizer heater power supply.	SR 3.4.11.2	SR 4.6.C and Table 4.1-2A Item 7	8

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-87	Increases CTS requirements for PIV leakage from 1.0 to 0.5 gpm per inch of nominal valve size up to 5 gpm maximum.	SR 3.4.15.1	SR 4.3	3
L3.4-88	Increases CTS SR interval from 5 times per week to once per week for RCS gross activity determination.	SR3.4.17.1	Table 4.1-2B Item 1	3, 10
L3.4-91	Eliminates CTS requirement to sample once per 4 hours when specific activity exceeds 100/E uCi/gram.	LCO 3.4.17	Table 4.1-2B Item 4a	3, 10
L3.4-109	Increases CTS Completion Time for restoring an inoperable Pressurizer Safety Valve to OPERABLE from 12 hours to 24 hours.	LCO 3.4.10	LCO 3.1.A.2.b (1)	6
L3.4-118	Relaxes CTS actions to de-energize all control rod drive mechanisms in the event that both RCPs are inoperable or not in operation. The ITS does not restrict the plant to only using one method, as the CTS, of placing the control rod drive system in a condition incapable of rod withdrawal.	LCO 3.4.5	LCO 3.1.A.1.b(3)	4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-126	Relaxes the CTS requirement for both an RCP and its associated SG as an acceptable method of decay heat removal. The ITS only requires the SG as an acceptable method of decay heat removal and does not require its associated RCP.	LCO 3.4.6 and 3.4.7	LCO 3.1.A.1.c (1)	1, 4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.4 – Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.4-01	Relocates CTS specific limits for RCS Tave and pressurizer pressure to the COLR.	Methodology	COLR	LCO 3.10.J	1, 2, 3
LR3.4-24	Relocates descriptive information of what equipment is included in a system. This information is needed to assist in making OPERABILITY determinations.	5.5.12, Bases Control Program	Bases	LCO 3.1.A.1.c(1), 3.1.A.1.c(2), 3.1.A.1.d(1), and 3.1.A.2.a(1)	1, 2
LR3.4-53	Relocates specific status of block valve and back up air supply charge for the PORVs since they are included through the definition of OPERABILITY.	5.5.12, Bases Control Program	Bases	LCO 3.1.A.2.c (2) and 3.1.A.2.c(3)	1, 2
LR3.4-74	Relocates descriptive information explaining that the results of the evaluations for the sources of leakage are to be used for continued safe operation.	5.5.12, Bases Control Program	Bases	LCO 3.1.C.2.b	2, 3
LR3.4-94	Relocates the RCS Radiochemistry and RCS Tritium activity requirements since these items are not significant in limiting SGTR offsite dose.	10CFR50.59	TRM	Table 4.1-2B Items 5 and 6 and Note 2	2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive Changes
ITS Section 3.4- Reactor Coolant System
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.4-96	Relocates CTS details to measure RCS boron concentration at power.	10CFR50.59	TRM	Table 4.1-2B Item 8 Note 4	3
LR3.4-97	Relocates CTS list of Primary Coolant System Pressure Isolation Valves and test methodology.	5.5.12, Bases Control Program	Bases	SR 4.3	1, 3
LR3.4-98	Relocates details for performing SR for Pressurizer Heaters.	5.5.12, Bases Control Program	Bases	SR 4.6.C	1, 2, 3
LR3.4-101	Relocates CTS details to perform an engineering evaluation for determining the effects of the out-of-limit condition on the structural integrity of the RCS.	5.5.12, Bases Control Program	Bases	LCO 3.1.B.1.b	2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.4 – Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.4-04	Replaced CTS prose description of the conditions of applicability adding specific ITS MODES which impose plant equipment requirements earlier in the plant startup evolution.	LCO 3.4.4	LCO 3.1.A.1.a(1)
M3.4-06	Adds a restriction to CTS for RCS loop inoperability during low power PHYSICS TESTS requiring power level to be less than P-7 in addition to providing an associated action statement.	LCO 3.4.18	LCO 3.1.A.1.a(1)
M3.4-07	Adds SRs to the CTS to be performed during low power PHYSICS TESTS.	SR 3.4.18.1 and 3.4.18.2	3.1.A.1.a(1)
M3.4-11	Adds new SR to verify each RCS loop is in operation while at power.	SR 3.4.4.1	3.1.A.1.a(2)
M3.4-12	Adds APPLICABILITY constraints to the CTS prose descriptions resulting in new actions and additional requirements being placed on plant operations.	LCO 3.4.5	LCO 3.1.A.1.b
M3.4-13	Adds new requirements to the CTS requiring both RCS loops to operate if the Rod Control System is capable of rod withdrawal or only one loop is required to operate if the Rod Control System is not capable of rod withdrawal.	LCO 3.4.5	LCO 3.1.A.1.b(1)
M3.4-17	Adds new Actions to the CTS which address one RCS loop not in operation with the reactor trip breakers closed and the Rod Control System capable of rod withdrawal.	LCO 3.4.5, Condition C	LCO 3.1.A.1.b(3)
M3.4-21	Adds new SRs to the CTS verifying that the required RCS loop is in operation, the SG is capable of decay heat removal, and power is available to the RCP that is not operating.	SR 3.4.5.1, 3.4.5.2, and 3.4.5.3	3.1.A.1.b(3)
M3.4-26	Adds new specific operability requirements to the CTS requiring that the SG is capable of decay heat removal.	LCO 3.4.7	LCO 3.1.A.1.c(1)

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.4-31	Adds new SRs requiring verification that the required RHR or RCS loop is in operation, the SG is capable of decay heat removal, and power is available to the required RHR or RCP that is not operating.	SR 3.4.6.1, 3.4.6.2, and 3.4.6.3	NA
M3.4-32	Adds new SRs requiring verification that one RHR loop is in operation, the SG is capable of decay heat removal, and power is available to the RHR pump that is not operating.	SR 3.4.7.1, 3.4.7.2, and 3.4.7.3	NA
M3.4-33	Adds Required Action that when both RHR loops are inoperable, suspend operations involving reduction in RCS boron concentration.	LCO 3.4.8, Condition B	LCO 3.1.A.1.d
M3.4-34	Restricts CTS from allowing an RHR pump to be shutdown for 1 hour to allow an RHR pump to be shutdown for 1 hour in an 8 hour period.	LCO 3.4.8, Note 1	LCO 3.1.A.1.d(1)
M3.4-37	Adds SRs to require verification that one RHR loop is in operation and verify power is available to the RHR pump that is not operating.	SR 3.4.8.1 and 3.4.8.2	NA
M3.4-38	Restricts CTS from allowing an RHR pump to be shutdown for 1 hour to allow an RHR pump to be shutdown for 1 hour in an 8 hour period.	LCO 3.4.6 and LCO 3.4.7 Note 1	LCO 3.1.A.1.d
M3.4-41	Increases CTS operational restrictions by lowering the pressurizer high water level Allowable Value below the level required in the CTS to assure that there is a steam bubble in the pressurizer.	LCO 3.4.9	LCO 3.1.A.2.a(1)
M3.4-42	Eliminates CTS flexibility by deleting the 1 hour allowed to initiate actions necessary for shutdown.	LCO 3.4.9, Condition A, LCO 3.4.14, Conditions C and D	LCO 3.1.A.2.a(3), 3.1.C.2.c, 3.1.C.2.d and 3.1.C.2.e
M3.4-43	Adds new Required Actions for the possibility that the pressurizer is inoperable.	LCO 3.4.9, Condition A	LCO 3.1.A.2.a(3)

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.4-44	Adds a new SR requiring periodic verification that the pressurizer water level is $\leq 90\%$.	SR 3.4.9.1	NA
M3.4-45	Restricts CTS APPLICABILITY by requiring two RCS PSVs to be operable whenever both RCS cold leg temperatures are greater than the OPPS enable temperature specified in the PTLR. This requires more components to be operable for more plant conditions.	LCO 3.4.10 and 3.4.10, Condition B	LCO 3.1.A.2.b(1)
M3.4-51	Adds new Action Statements and restrictions requiring immediate action to be taken for the Condition of one or two SI pumps being capable of injecting into the RCS. The CTS would allow 1 hour to take action instead of being required to immediately take action.	LCO 3.4.12 and 3.4.13, Condition A	LCO 3.1.A.2.c(2) and 3.1.A.2.c(3)
M3.4-52	Adds a new Required Action, Completion Time, and SR restrictions to the CTS for ECCS accumulator isolation.	LCO 3.4.12 and 3.4.13, Condition B, and SR 3.4.13.1, 3.4.13.2, 3.4.13.3, and 3.4.13.4	LCO 3.1.A.2.c(2) and 3.1.A.2.c(3)
M3.4-54	Adds new SRs and associated Frequencies requiring verification that only one (or no) SI pump capable of injecting, RCS is vented and PORV block valves are open as applicable for the MODES of operation and the method of providing overpressurization protection.	SR 3.4.12.1, 3.4.12.2, 3.4.12.3, 3.4.13.1, 3.4.13.2, 3.4.13.3, and 3.4.13.4	NA
M3.4-57	Adds a new Specification, LCO, Conditions, and SRs for RCS Minimum Temperature for Criticality.	LCO 3.4.2 and SR 3.4.2.1	NA
M3.4-62	Adds Frequency of 72 hours for evaluating the integrity of the RCS following an out-of-limit condition.	LCO 3.4.3, Condition A	LCO 3.1.B.1.b

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.4-63	Adds new Required Actions for out-of-limit conditions when the RCS is below 200 °F.	LCO 3.4.3, Condition C	LCO 3.1.B.1.b
M3.4-64	Adds new SR to verify that RCS pressure, temperature and heatup and cooldown rates are within the specified limits.	SR 3.4.3.1	NA
M3.4-72	Adds SRs to perform Channel Checks, COTs and Calibrations of containment radiation monitors and Calibration of sump pump run time instrumentation.	SR 3.4.16.1, 3.4.16.2, 3.4.16.3, and 3.4.16.4	NA
M3.4-81	Adds a Frequency of every 4 hours for verifying that the limits of dose equivalent I-131 primary coolant specific activity limit are within limits.	LCO 3.4.17, Condition A	LCO 3.1.D.2.a
M3.4-84	Increases the Frequency to perform the functional test of the OPPS from each refueling outage to monthly when the RCS temperature is below the LTOP enable temperature.	SR 3.4.12.4	Table 4.1-1C Item 25
M3.4-85	Adds a Frequency of 12 hours to perform the OPPS mitigation SR.	SR 3.4.12.4	Table 4.1-1C Note 38
M3.4-108	Adds Frequency requirements to perform a RCS flow test within 72 hours after reaching 90% RTP.	SR 3.4.1.3	LCO 3.10.J
M3.4-117	Adds a specific limit of 31 days to the CTS for initial performance of RCS Radiochemistry E determination.	SR 3.4.17.3	Table 4.1-2B Note 1
M3.4-123	Eliminates CTS flexibility by requiring that the block valves be restored to OPERABLE and does not provide an alternate option of placing the PORVs in manual as in the CTS.	LCO 3.4.10	3.1.A.2.c (1)(b)5

Table R – Relocated Specifications and Removed Details
ITS Section 3.4 – Reactor Coolant System
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
R3.4-56	Relocated CTS reactor vessel head vent system LCO, Required Actions, and associated Surveillances.	TRM	10CFR50.59	LCO 3.1.A.3 and SR 4.18	2, 5, 6
R3.4-66	Relocated CTS pressurizer heatup and cool down Specification including LCO, Required Actions, and Surveillances.	PTLR	NRC approval of methodology	LCO 3.1.B.2	1, 2, 5, 6
R3.4-67	Relocated CTS steam generator pressure/temperature limits specification.	PTLR	NRC approval of methodology	LCO 3.1.B.3	1, 2, 5, 6

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.5-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.5.2	LCO 3.3, Table 4.1-2B, and 4.5
A3.5-01	Revises specific CTS details of RWST OPERABILITY requirements for volume and boron concentration to an SR.	LCO 3.5.4	LCO 3.3.A.1.a
A3.5-04	Revises CTS details for the ECCS Accumulators OPERABILITY requirements for volume, boron concentration, nitrogen cover pressure, and verification that the isolation valves are open to the SRs.	LCO 3.5.1	LCO 3.3.A.1.b
A3.5-07	Replaces CTS Applicability Statement to exclude MODE 4.	LCO 3.5.2	LCO 3.3.A.1.c
A3.5-15	Replaces CTS Action Statement for Accumulator inoperability to exclude boron concentration events.	LCO 3.5.1	LCO 3.3.A.2.e
A3.5-17	Clarifies CTS requirements for entering a shutdown track is one ECCS train is inoperable and the other train cannot supply 100% flow.		
A3.5-20	Incorporates NRC approved LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System," submitted April 17, 2000.	SR 3.5.4.2	LCO 3.3.A.1.a, Table 4.1-2B, 4.5.B.3.a, and 4.5.B.3.c
A3.5-22	Did not include CTS reference to the IST Program using a Specification number with the actual title of IST.	NA	SR 4.5.B.1.a

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.5-301	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	LCO 3.5	LCO 3.3 and SR 4.5
A3.5-302	Revises CTS Specification titles for Safety Injection and Residual Heat Removal System, and ECCS Safety Injection System to ECCS.	LCO 3.5 and SR 3.5.2.5	LCO 3.3.A, SR 4.5.B.1.a, and 4.5.B.3.f
A3.5-303	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY.	LCO 3.5.2	LCO 3.3.A.1 and 3.3.A.2
A3.5-304	Replaces CTS OPERABILITY range for accumulator volume and nitrogen cover pressure expressed in terms of a median value plus or minus the allowable variation by the equivalent simple range over which the parameters are acceptable.	SR 3.5.1.2	LCO 3.3.A.1.b(3)
A3.5-306	Clarifies CTS requirements, "any one of the following conditions of inoperability may exist . . ." This requirement prevents two or more of the listed conditions from existing at the same time. In the ITS, these conditions may be in more than one specification. The SFDP provides a mechanism to assure that entry into multiple TS Conditions will not result in loss of safety function.	SR 3.5.2	LCO 3.3.A.2
A3.5-307	Incorporates NRC approved LAR titled, "Increase ECCS Accumulator Allowed Outage Time to 24 hours."	LCO 3.5.1	LCO 3.3.A.2.e
A3.5-309	Clarifies CTS Actions to be taken if both accumulators were inoperable. ITS specifically has a Condition requiring entry into LCO 3.0.3. The CTS would require entry into LCO 3.0.C since there would not be a specific Action Statement for both accumulators being inoperable.	SR 3.5.1.1	LCO 3.3.A.1.b.(1)
A3.5-316	Incorporates both PI specific valve numbers with their associated Westinghouse valve numbers. Both numbers are utilized in the control room.	SR 3.5.2.1	LCO 3.3.A.1.g (1) and (2)

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.5-09	Reduces CTS requirements for two trains of ECCS in MODE 4 down to the SI pump disable temperature to be OPERABLE. The ITS only requires one train of ECCS to be OPERABLE in MODE 4 above the SI pump disable temperature.	LCO 3.5.3	NA	1, 2, 4
L3.5-13	Reduces CTS shutdown requirements of MODE 5 within 36 hours to MODE 4 in 12 hours in the event that one or more trains of ECCS are inoperable for longer than 72 hours.	LCO 3.5.2	LCO 3.3.A.2	4, 6
L3.5-16	Increases CTS allowed outage time from 1 hour to 72 hours for boron concentration in one accumulator to be outside its limits.	LCO 3.5.1	NA	6
L3.5-19	Increases CTS Completion Time from 1 hour to 8 hours to restore the RWST boron concentration to within its limits.	LCO 3.5.4	NA	6, 9
L3.5-25	Increases CTS SR interval from 18 to 24 months for throttle valve position verification.	SR 3.5.2.7	SR 4.5.B.3.g.3	8

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.5-310	Relaxes CTS requirements adding a Note allowing, in MODE 3, both SI pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing.	SR 3.4.15.1	LCO 3.3	1, 4, 6
L3.5-315	Relaxes CTS requirements allowing combinations of ECCS components or subsystems to be inoperable provided at least 100% ECCS flow equivalent of a single ECCS train remains OPERABLE.	LCO 3.5.2	LCO 3.3.A.2.f	4, 6, 9
L3.5-317	Eliminates CTS OPERABILITY requirements for valve position monitor lights for SI valves and RHR valves, and requires valve position monitor lights and alarms to be OPERABLE for ECCS accumulator valves.	NA	LCO 3.3.A.1.g and 3.3.A.2.g	1, 4

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.5 – Emergency Core Cooling Systems
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.5-11	Relocates specific details for controlling valve position changes.	5.5.12, Bases Control Program	Bases	LCO 3.3.A.1.f	2, 3
LR3.5-14	Relocates specific details on system components, which could be inoperable.	5.5.12, Bases Control Program	Bases	LCO 3.3.A.2.a, 3.3.A.2.b, 3.3.A.2.c, and 3.3.A.2.d	1, 2
LR3.5-21	Relocates specific test parameters, conditions and acceptance criteria.	5.5.12, Bases Control Program	Bases	SR 4.5.A.1.a and 4.5.A.1.b	2, 3
LR3.5-23	Relocates details to test specific components such as pumps and valves.	5.5.7, IST Program	IST Program	SR 4.5.B.1.a	3, 4
LR3.5-24	Relocates details for verifying ECCS throttle valve stop position after each stroking or maintenance.	10CFR50.59	TRM	SR 4.5.B.3.g.1	2, 3
LR3.5-26	Relocates details for performing ECCS post-modification flow tests.	10CFR50.59	TRM	SR 4.5.B.3.h	1, 2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.5-02	Adds new SR requiring verification of the RWST water volume every 7 days.	SR 3.5.4.1	NA
M3.5-03	Adds a new requirement establishing the upper limits for boron concentration in the RWST to 3500 ppm.	SR 3.5.4.2	LCO 3.3.A.1.a
M3.5-05	Adds new SRs requiring verification that the isolation valves are fully open, the water volume is within limits, the cover pressure is within limits and power is removed from the ECCS accumulator isolation valves.	SR 3.5.1.1, 3.5.1.2, 3.5.1.3, and 3.5.1.5	NA
M3.5-06	Revises CTS requirements stating the SI pumps, RHR pumps, and RHR heat exchangers are to be OPERABLE. The ITS requires the ECCS Trains to be OPERABLE which not only envelopes the CTS equipment but is more inclusive of other equipment than the specific requirements of the CTS.	LCO 3.5.2	LCO 3.3.A.1.c, 3.3.A.1.d, and 3.3.A.1.e
M3.5-08	Adds new SRs requiring verification of ECCS MOV positions, non-MOV positions, MOV breaker positions and containment sumps clear of debris.	SR 3.5.2.1, 3.5.2.2, 3.5.2.3, and 3.5.2.8	NA
M3.5-10	Adds new SRs to verify valve position, verify power has been removed for specific valves, verify ECCS throttle valves are in their correct position, and verify ECCS sump suction inlet is not restricted by debris.	SR 3.5.3.1	NA
M3.5-18	Adds CTS requirements to remove power from ECCS accumulator isolation valves instead of just relying upon monitor lights and alarms.	NA	LCO 3.3.A.1.g (3)

Table M – More Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.5-308	Reduces CTS Completion Time to place the reactor in Mode 3 by 1 hour. CTS LCO 3.0.C allows 1 hour to initiate reactor shutdown, an additional 6 hours to be in MODE 3 and another 30 hours (total 37 hours) to be in MODE 5. The ITS would require the reactor be placed in MODE 3 within 6 hours and ≤ 1000 psig within 12 hours.	LCO 3.5.1	LCO 3.3.A.1
M3.5-311	Reduces CTS Completion Time allowance when entering LCO 3.0.C. CTS LCO 3.0.C would allow 1 hour to plan for shutdown, 7 hours to be in MODE 3 and 37 hours to be in MODE 5. The ITS requires the unit to be in MODE 3 within 6 hours and be in MODE 5 within 36 hours.	LCO 3.5.4	LCO 3.3.A.1.a
M3.5-312	Adds new LCO, for ECCS RHR and SI subsystems. The CTS does not require any specific time to restore the RHR or SI subsystem to OPERABLE therefore requiring entry into LCO 3.0.C. CTS LCO 3.0.C allows 1 hour to initiate reactor shutdown, an additional 6 hours to be in MODE 3 and another 30 hours (total 37 hours) to be in MODE 5. ITS allows 24 hours to be in MODE 5.	LCO 3.5.3	LCO 3.3.A.1
M3.5-313	Adds new Required Action, Completion Time, and associated shutdown track for the RWST if it cannot be returned to OPERABLE status within the associated Completion Time.	LCO 3.5.4	LCO 3.3.A.2
M3.5-314	Adds new Condition requiring that if one or more trains of ECCS are inoperable for longer than the 72 hours, the plant must be placed in Mode 3 within 6 hours and Mode 4 within 12 hours. The ITS requires reducing RCS temperatures to Mode 4 in 12 hours instead of 30 hours to be in Mode 4 which is allowed by the CTS.	LCO 3.5.2	LCO 3.3.A.2

Table R – Relocated Specifications and Removed Details
ITS Section 3.5 – Emergency Core Cooling Systems
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.6-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431. These changes do not change or delete any technical requirements.	LCO 3.6	LCO 1.0, 3.3.B, Table TS.3.5-1, 3.6, Table TS.4.1-1C, Table TS.4.1-2B, SR 4.4, and 4.5
A3.6-03	Replaces general CTS prose descriptions with equivalent ITS MODES of APPLICABILITY. The plant Modes to which this specification apply have not been changed.	LCO 3.6	LCO 3.3.B.1, 3.3.B.2, 3.6.A.1, 3.6.A.2, 3.6.B.1, 3.6.C.2, 3.6.D.2, 3.6.G, 3.6.H.1, 3.6.I.1, 3.6.I.2, 3.6.J.1, 3.6.J.2, 3.6.K.1, 3.6.K.2, 3.6.L.1, 3.6.M.1, 3.6.M.2.c, 3.6.M.3, and Table 4.1-1C Note 39, SR 4.4.G and 4.4.H.

Table A – Administrative Changes
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.6-05	Revise CTS CONTAINMENT INTEGRITY Definition Items 1, 3 and 4 to include in various ITS Specifications and SRs.	LCO 3.6.1, 3.6.2, and 3.6.3	1.0 CONTAINMENT INTEGRITY
A3.6-09	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	NA	LCO 3.6, SR 4.4, and 4.5
A3.6-11	Revises CTS wording for defined times for Required Actions. The ITS defines all action times from the time the first initiated action occurs. Thus the ITS is equivalent to the CTS Required Action time.	LCO 3.6	LCO 3.3.B.2, 3.6.A.2, 3.6.G, 3.6.I.2, 3.6.J.2, 3.6.K.2, 3.6.M.2.c and 3.6.M.3
A3.6-19	Clarification of the CTS is provided for guidance for multiple valves in multiple penetrations is provided in an equivalent Note allowing separate Condition entry for each containment flow path.	LCO 3.6.3, Note 2	LCO 3.6.C.1
A3.6-22	Clarifies intent of CTS for inoperable or leaking barriers. These provisions are the same as PI current practice therefore these changes are administrative.	LCO 3.6.3, Notes 3 and 4	LCO 3.6.C.1
A3.6-23	Clarifies CTS by adding a Note to apply the requirements to those penetrations which do not use a closed system as a barrier.	LCO 3.6.3, Condition A	LCO 3.6.C.3
A3.6-24	Clarifies CTS by including the clause, "penetration flow paths with one" to those penetration flow paths with a single inoperable barrier. The Condition for a penetration flow path with two inoperable barriers is addressed separately.	LCO 3.6.3, Condition C	LCO 3.6.C.3

Table A – Administrative Changes
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.6-26	Clarifies CTS wording which allows a valve to be deactivated when a containment isolation valve is inoperable.	LCO 3.6.3	LCO 3.6.C.3.(b)
A3.6-42	Clarifies CTS stating that entry into LCO 3.6.1 is required if airlock leakage exceeds the Containment Leakage Rate Test Program acceptance criteria. This is the same action the plant would take under the CTS.	LCO 3.6.2	LCO 3.6.M
A3.6-48	Clarifies CTS by providing two Notes. These changes are editorial and are consistent with PI operating practices and technical requirements.	SR 3.6.2.1	SR 4.4.A.2 and 4.5.A.2.a
A3.6-49	Clarifies intent of CTS actions for two inoperable doors in an air lock if both doors in the same air lock are inoperable.	LCO 3.6.2, Conditions A and B	LCO 3.6.M.1
A3.6-54	Clarifies CTS SR Frequency for a functional test of the containment vacuum breakers to be provided quarterly consistent with current PI procedures.	SR 3.6.8.1	Table 4.1-1C Function 10
A3.6-62	Restates CTS requirements for the inservice purge penetration leakage.	LCO 3.6.8	LCO 3.6.B.3
A3.6-77	Clarifies CTS requirements by entering a reactor shutdown track per LCO 3.0.C.	LCO 3.6.3, Conditions D, and E	LCO 3.6.D.2.e
A3.6-80	Clarifies CTS requirements for testing of containment spray and spray additive valves. These changes do not change the type or number of valves which are tested under CTS.	SR 3.6.6.4	SR 4.5.B.3.f

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-12	Increases CTS Completion Time from 36 to 84 hours to place the unit in MODE 5 for an inoperable containment spray train or inoperable spray additive system.	LCO 3.6.5, Condition B	LCO 3.3.B.2	6
L3.6-21	Relaxes CTS requirements from being capable of closing containment isolation valves under administrative control within one minute to allowing penetrations to be unisolated intermittently.	LCO 3.6.3	LCO 3.6.C.1	4, 6
L3.6-27	Increases CTS flexibility by allowing two additional options for isolating a penetration barrier.	LCO 3.6.3, Condition B	LCO 3.6.C.3.(c)	4
L3.6-28	Relaxes CTS requirements allowing a startup to commence with one hydrogen recombiner inoperable by stating LCO 3.0.4 is not applicable.	LCO 3.6.7, Condition A	LCO 3.6.L	1, 4
L3.6-33	Increases CTS Completion Time from 4 to 72 hours to isolate a penetration flow path with an inoperable isolation barrier when a closed system provides the other containment isolation boundary.	LCO 3.6.3, Condition C	LCO 3.6.C.3.(c)	6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-43	Relaxes CTS requirements by allowing passage through an inoperable air lock door for up to seven days if both air locks are inoperable.	LCO 3.6.2, Condition A	LCO 3.6.M.2	4, 6, 9
L3.6-46	Relaxes CTS requirements by allowing verification of locked air lock doors in high radiation areas by administrative means.	LCO 3.6.2, Conditions A and B	LCO 3.6.M.2.b	4
L3.6-53	Increase CTS SR interval from monthly to 184 days to test the caustic standpipe NaOH concentration.	SR 3.6.6.3	Table 4.1-2B Item 11	10
L3.6-63	Relaxes CTS requirements by allowing the system test to be initiated by an actual or simulated signal instead of just a simulated signal.	SR 3.1.5.3, 3.1.5.4, 3.6.3.7, 3.6.5.5, 3.6.5.6, 3.6.5.7, 3.6.6.4, and 3.6.8.1, 3.6.3.7	SR4.4.B.3.c, 4.4.C, 4.4.E, 4.5.A.2.a, and 4.5.B.3.f	3

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-74	Relaxes CTS requirements for declaring an air lock door inoperable based on the interlock mechanism.	LCO 3.6.3, Condition B	LCO 3.6.M.3	4
L3.6-75	Relaxes CTS requirements for initiating a reactor shutdown when one air lock is inoperable and an inoperability on the other air lock by allowing separate Condition entry for each air lock thus delaying or avoiding a reactor shutdown.	LCO 3.6.2	LCO 3.6.M	3
L3.6-76	Relaxes CTS requirements for requiring both access doors to be closed by allowing one door being verified closed.	SR 3.6.10.1	1.0	4
L3.6-81	Eliminates CTS requirements for allowing one of several conditions of inoperability existing at one time to allowing simultaneous inoperabilities for the same equipment.	LCO 3.6.5	LCO 3.3.B.2	4, 9
L3.6-83	Relaxes CTS requirements to enter CTS 3.0.C if two valves in the vacuum breaker system were inoperable with respect to their vacuum relief function. The ITS will allow the plant to continue operation if two valves in the same train are inoperable with respect to their two containment isolation valves in the same train are inoperable.	LCO 3.6.5	LCO 3.6.B.2, 3.6.B.3, and 3.0.C	1, 9

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-87	Increases CTS SR interval from 18 to 24 months for testing the Shield Building Ventilation System initiated from a safety injection signal.	3.6.9.3	4.4.B.3.c	8
L3.6-90	Relaxes CTS requirements by allowing entry into both the VBT and Containment Isolation Valve TS in the event of an VBT inoperability.	3.6.3 and 3.6.8	3.6.B.1 and 3.6.B.2	4, 6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.6-01	Relocates CTS definition of Containment Integrity and specific details that the hatch must be closed and sealed.	5.5.12, Bases Control Program	Bases	1.0	2
LR3.6-02	Relocates specific CTS details for shield building integrity.	5.5.12, Bases Control Program	Bases	1.0	2
LR3.6-06	Relocates specific CTS details for the Spray Additive Tank which are also included in the applicable SR statements.	5.5.12, Bases Control Program	Bases	LCO 3.3.B.1.c	1, 2
LR3.6-07	Relocates specific CTS controls on containment cooling valve positions.	5.5.12, Bases Control Program	Bases	LCO 3.3.B.1.d and 3.3.B.1.e	2, 3
LR3.6-16	Relocates specific CTS details for the vacuum breaker system components required for OPERABILITY.	5.5.12, Bases Control Program	Bases	LCO 3.6.B.1	1, 2
LR3.6-36	Relocates specific CTS details for the 36-inch containment purge system and 18-inch containment inservice purge system including provision for the isolation valves to isolate, and meet containment leakage rate acceptance criteria, or the system is to be blind flanged.	5.5.12, Bases Control Program	Bases	LCO 3.6.D.1, 3.6.D.2.a, 3.6.D.2.c, and 3.6.D.2.e	1, 2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.6-56	Relocates specific CTS details for how the SBVS quarterly test is to be conducted and the input assumptions.	10CFR50.59	TRM	SR 4.4.B.1 and Figure 4.4-1	2, 3
LR3.6-57	Relocates specific CTS details for conducting the ventilation filter tests.	5.5.10, Ventilation Filter Test Program	VFTP	SR 4.4.B.3.a, 4.4.B.3.b, 4.4.B.4.a, 4.4.B.4.b, 4.4.B.4.c, and 4.4.B.5	1, 2, 3
LR3.6-64	Relocates specific CTS details for how each hydrogen recombiner SR is to be performed.	5.5.12, Bases Control Program	Bases	SR 4.4.1.a, 4.4.1.b, and 4.4.1.c	2, 3
LR3.6-66	Relocates specific CTS details for conducting the containment spray system SR test along with its associated acceptance criteria.	5.5.12, Bases Control Program	Bases	SR 4.5.A.2.a and 4.5.A.2.c	1, 3
LR3.6-67	Relocates specific CTS details for conducting the containment fan cooler unit SR tests along with its associated specific parameters to be monitored.	5.5.12, Bases Control Program	Bases	SR 4.5.A.3	1, 3
LR3.6-71	Relocates specific CTS details for conducting the containment spray pump SR tests along with their associated acceptance criteria.	5.5.7, IST Program	IST	SR 4.5.B.1.a	1, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.6-72	Relocates specific CTS details for conducting the Containment Fan Motor SR test along with its associated specific parameters to be monitored.	5.5.12, Bases Control Program	Bases	SR 4.5.B.2	1, 3
LR3.6-73	Relocates specific CTS details for spray additive tank valve testing.	5.5.7, IST Program	IST Program	SR 4.5.B.3.d	4

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.6-04	Restricts CTS LCO by requiring an ECCS Train to be OPERABLE instead of only requiring specific components.	LCO 3.6.5	LCO 3.3.B.1.a and 3.3.B.1.b
M3.6-13	Adds new SR requiring verification of containment spray system valve positions if the valves are not locked sealed or otherwise secured in position.	SR 3.6.5.1	NA
M3.6-14	Adds new SRs requiring verification of spray additive system valve positions if the valves are not locked, sealed, or otherwise secured in position and verification of spray additive tank solution volume.	SR 3.6.6.1 and 3.6.6.2	NA
M3.6-17	Revises CTS to include all containment isolation valves instead of just selected valves.	LCO 3.6.3	LCO 3.6.C.1
M3.6-29	Eliminates CTS flexibility of allowing 1 hour to initiate a reactor shutdown when LCO 3.0.C is entered.	LCO 3.6.9	LCO 3.6.H
M3.6-31	Adds a new requirement to verify that penetration flow paths are isolated.	LCO 3.6.3	LCO 3.6.C.3.c
M3.6-32	Adds a new requirement for isolation of penetration flow paths with two inoperable penetration barriers. The CTS would allow 4 hours to perform this whereas, the ITS only allows 1 hour.	LCO 3.6.3, Condition B	LCO 3.6.C.3
M3.6-34	Adds SRs requiring verification that the 36-inch containment purge blind flange is installed, that penetrations outside containment required to be closed post-accident are closed if not locked, sealed, or otherwise secured, that penetrations inside containment required to be closed post-accident are closed if not locked, sealed, or otherwise secured, and automatic isolation valve closure time.	SR 3.6.3.1, 3.6.3.3, 3.6.3.4, and 3.6.3.5	NA
M3.6-37	Adds a new SR requiring verification that one shield building door in each access opening is closed during plant conditions requiring shield building integrity.	SR 3.6.10.1	NA

Table M – More Restrictive Changes
ITS Section 3.6 – Containment Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.6-38	Eliminates CTS flexibility of allowing 1 hour to prepare for a reactor shutdown. Instead the ITS requires the plant to initiate shutdown when the Required Actions and associated Completion Times are not met.	LCO 3.6.3, Condition E	LCO 3.6.C.3
M3.6-39	Eliminates CTS flexibility of allowing 1 hour to prepare for a reactor shutdown if a recombiner is inoperable for more than 30 days. Instead the ITS requires the plant to initiate shutdown when the Required Actions and associated Completion Times are not met.	LCO 3.6.7, Condition B	LCO 3.6.L.2
M3.6-41	Adds new SR requiring verification that containment pressure is within limits.	SR 3.6.4.1	NA
M3.6-44	Adds a Completion Time that in one hour verify that the OPERABLE air lock door is closed.	LCO 3.6.2, Condition A	LCO 3.6.M.2.a
M3.6-51	Adds new requirements to immediately verify containment leakage rates and 1 hour to verify that one air lock door is closed.	LCO 3.6.2, Condition C	LCO 3.6.M.3
M3.6-52	Adds a new SR requiring verification only one air lock door can be opened at a time.	SR 3.6.2.2	NA
M3.6-61	Reduces CTS flexibility replacing terminology of a circuit with a train. A train may include more equipment than a circuit.	SR 3.6.9.1	SR 4.4.B.4.d
M3.6-68	Adds a new requirement generating additional actions that if the secondary containment bypass leakage is not within limits, restore to within limits, within 4 hours.	LCO 3.6.3 Condition D	LCO 3.6.B.3
M3.6-82	Adds a new Note which requires entry into the "Containment Integrity" Specification when vacuum breaker isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.	LCO 3.6.8	LCO 3.6.B.3

Table M – More Restrictive Changes
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.6-89	Eliminates CTS flexibility by restricting the time allowed for one containment fan cooler train and one containment spray train to be out of service to 10 days from discovery of failure to meet the LCO. The CTS does not require such a limitation.	LCO 3.6.5, Conditions A and C	LCO 3.3.B.2.a and 3.3.B.2.b
M3.6-91	Reduces CTS Completion Time from 8 hours to 1 hour to correct the temperature of the containment shell or temperature differential between the containment air temperature and shield building annulus.	LCO 3.6.1, Condition A	LCO 3.6.J.2 and 3.6.K.2

Table R – Relocated Specifications and Removed Details
ITS Section 3.6 – Containment Systems
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.7-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.7	LCO 3.3.C, Table TS.3.5-2B, 3.6.D, 3.7, 3.7.A.5(a), 3.8.B, 3.13, Table TS.4.1-2A, Table TS.4.1-2B, SR 4.4.B, 4.5, 4.7, 4.8, 4.14, 4.15, and 4.20
A3.7-01	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	NA	LCO 3.4, 3.13, SR 4.7, 4.8, 4.14, 4.15 and 4.20
A3.7-02	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.7.1, 3.7.4, 3.7.5, 3.7.7, and 3.7.12	LCO 3.4.A, 3.4.B, 3.4.D.1, 3.3.C.1.a, 3.3.D, 3.6.E and 3.6.F
A3.7-04	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 Cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, and 3.7.10 Cond A and C	LCO 3.4.A.2, 3.4.B.2, 3.3.C.1.b, 3.3.D.2 and 3.13.A.2

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.7-05	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 Cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, 3.7.10 Cond A, C, F, 3.7.12 Cond B and C, and 3.7.14 Cond A	LCO 3.4.A.2, 3.4.B.2, 3.4.D, 3.3.C.1.b, 3.3.D.2, 3.13.A.2 and 3.6.E.1.
A3.7-06	Clarifies CTS defined times for required actions from the time a new action is initiated. The ITS defines all action times from the time the first initiated action occurs. Thus, the ITS is equivalent to the CTS required action time.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, 3.7.10 Cond F, and 3.7.12 Cond B and C	LCO 3.4.A.2, 3.4.B.2,, 3.3.C.1.b, 3.3.D.2, 3.13.A.2 and 3.6.E.1.
A3.7-09	Includes AFW requirements for two units operating in the ITS LCO such that the requirements are the same for each operating unit. Therefore, a separate statement for two unit operation is not required. This change is consistent with the intent of the CTS.	LCO 3.7.5	LCO 3.4.B.1.b
A3.7-20	Divides CTS requirements contained in one specification into separate specifications in the ITS. This is consistent with PI operational practices.	LCO 3.7.6 Cond B	LCO 3.4.B.2
A3.7-21	Clarifies CTS requirements for completion of turbine driven AFW pump testing. This is consistent with current PI operating practices.	LCO 3.7.5.2 Note	LCO 3.4.B.2.a

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.7-36	Did not include CTS specifications stating requirements for single unit or two unit operations. This is included in the intent of the ITS and does not change any operational practices.	NA	LCO 3.3.C.1
A3.7-44	Restates CTS requirements for safeguards CL pump inoperability to state "No safeguards pumps OPERABLE for one train . . ." This statement is substantively the same as the CTS requirements with no change in operational practices.	LCO 3.7.8 Cond B	LCO 3.3.D.2.a
A3.7-45	Rewords CTS requirements to further align with ISTS phraseology.	LCO 3.7.8 Cond B	LCO 3.3.D.2.a.(1) and (2)
A3.7-47	Rewords CTS requirements to further align with ISTS phraseology in addition to including the requirements into the ITS.	LCO 3.7.8 Cond C	LCO 3.3.D.2.b(1) and (2)
A3.7-57	Clarifies CTS Action Statements for CRSVS during plant operation (MODES 1, 2, 3, and 4) and irradiated fuel handling operations. This is consistent with PI operating practices.	LCO 3.7.10 Cond D and E	LCO 3.13.A.1 and 3.13.A.2
A3.7-62	Restates CTS requirements for Auxiliary Building Special Ventilation Zone Integrity in ITS 3.7.12 requirements for the ABSVS; thus the title of this section is also revised.	LCO 3.7.12 Cond B and C	LCO 3.6.E.1
A3.7-66	Rewords CTS applicability by expanding it beyond involving a spent fuel cask containing fuel to state the boron concentration is to be maintained at 1800 ppm at all times when spent fuel is stored in the spent fuel pool. This change is consistent with PI operating practices.	LCO 3.7.16	LCO 3.8.B.1.C
A3.7-74	Restates CTS LCO 3.0.C which is equivalent to ITS LCO 3.0.3.	LCO 3.7.13 Action Notes, 3.7.16 Cond A, and 3.7.17 Cond A	LCO 3.8.D.4 and 3.8.E.1
A3.7-77	Restates CTS title of this specification to be consistent with the title of ITS 3.7.17.	LCO 3.7.17	LCO 3.8.E.1

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.7-78	Restates CTS title and terminology within this specification to be consistent with the title and terminology in ITS 3.7.16. No technical or operational changes have been made as a result of this change.	LCO 3.7.16 and SR 3.7.16.2	LCO 3.8.E.2 and Table 4.1-2B FU 13
A3.7-83	Restates CTS requirements for testing MSIV closure time upon receipt of an actuation signal by dividing it into two ITS SRs.	SR 3.7.2.2	SR 4.7
A3.7-94	Rewords CTS statement that test shall be performed within 24 hours of entering power operation. POWER OPERATION in this context has been defined as MODE 1 in accordance ITS definitions.	LCO 3.7.5.2 and 3.7.5.4 Note	SR 4.8.A.8 Note
A3.7-97	Rewords CTS specification with an explicit requirement to verify that each pump starts. This is consistent with the acceptance criteria PI uses for this test.	LCO 3.7.7.3	SR 4.5.A.4
A3.7-105	Restates CTS requirements to test the auxiliary building normal ventilation system isolation valves with the SR. This change does not result in any operational or technical changes to the CTS.	LCO 3.7.12.4	SR 4.4.E
A3.7-113	Restates CTS Frequency from refueling outage to 24 months. The CTS defines the Frequency for refueling outage as not to exceed 24 months. Therefore, the CTS and ITS are consistent and no technical or operational changes are made.	LCO 3.7.7.2, 3.7.7.3, and 3.7.8.5	SR 4.5.A.4.a, 4.5.A.5.a, 4.5.B.3.e, 4.5.A.B.3.f.

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-03	Increases CTS Completion Time from requiring entry into a reactor shutdown track to allowing 4 hours to restore the inoperable MSSV to operable status before beginning preparations to shut the plant down.	LCO 3.7.1 Cond A	LCO 3.4.A.1 and 3.0.C	6, 9
L3.7-07	Increases CTS Completion Time from 48 hours to 7 days for one SG PORV to be inoperable and 1 hour for two SG PORVs inoperable instead of entering a reactor shutdown track as would be required by the CTS.	LCO 3.7.4 Cond A and B	LCO 3.4.A.2.a and 3.0.C	6, 9
L3.7-11	Relaxes CTS requirements by considering the AFW operable during alignment and operation for SG level control if capable of being manually realigned to the AFW mode of operation.	LCO 3.7.5	LCO 3.4.B.1.c	1, 3, 4
L3.7-22	Increases CTS Completion Time from 72 hours to 7 days and 10 days from discovery of failure to meet the LCO with one steam supply to the turbine driven AFW pump inoperable .	LCO 3.7.5 Cond A	LCO 3.4.B.2	6
L3.7-25	Increases CTS Completion Time from 48 hours to 7 days to restore an inoperable CST to OPERABLE.	LCO 3.7.6 Cond A	LCO 3.4.B.2.c	6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-50	Relaxes CTS requirements by allowing the safeguards diesel generators and CL pumps to have their fuel oil supply below the required limits for 48 hours and 9 days from discovery of the failure to meet the LCO with an appropriate track for declaring them inoperable.	LCO 3.7.8	LCO 3.3.D.1.d and 3.7.A.5(a)	4, 6
L3.7-54	Relaxes CTS MODES of APPLICABILITY requirements for the Control Room Special Ventilation System being OPERABLE at all times to only MODES 1, 2, 3, and 4.	LCO 3.7.10	LCO 3.13.A.1	2
L3.7-56	Relaxes CTS APPLICABILITY requirements from during CORE ALTERATONS to irradiated fuel handling operations.	LCO 3.7.10 Cond D	LCO 3.13.A.1 and 3.13.A.2	2
L3.7-72	Eliminates CTS requirements to demonstrate operability of the redundant SFPSVS train when one train is inoperable.	LCO 3.7.13 Cond A and B	LCO 3.8.D.2	4
L3.7-85	Eliminates CTS requirements to demonstrate RCS full flow test each refueling shutdown.	SR 3.7.5.2	SR 4.8.A.1	3
L3.7-88	Eliminates CTS requirement to verify the position of valves that are locked in position.	NA	SR 4.8.A.6	3
L3.7-89	Eliminates CTS requirement to verify the normal AFW flow path to the SGs after each cold shutdown.	NA	SR 4.8.A.7	3

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-91	Increases CTS SR interval from 18 to 24 months for verifying AFW system automatic actuation.	SR 3.7.5.3 3.7.5.4	SR 4.8.A.8	8
L3.7-92	Relaxes CTS requirements by requiring verification of valve position for those valves that are not locked, sealed, or otherwise secured in position.	SR 3.7.5.3, 3.7.7.2, 3.7.7.3, and 3.7.8.3	SR 4.8.A.8 4.5.A.4, and 4.5.A.5	3
L3.7-93	Increases CTS flexibility by allowing credit to be taken for the performance of the SR by using either a test or actual signal.	SR 3.7.2.2, 3.7.5.4, 3.7.7.2, 3.7.8.5, 3.7.10.3, 3.7.12.4, and 3.7.13.3	SR4.7, 4.8.A.8, 4.5.A.4, 4.5.A.5, 4.14.A.2, 4.4.B.3.c, 4.4.E, 4.14.A.2, and 4.15.A.2	3
L3.7-95	Increases CTS interval from monthly to quarterly for testing of the SG PORVs.	SR 3.7.4.1	SR4.8.B	10
L3.7-101	Increases CTS SR interval from 18 to 24 months to test the automatic initiation of the Control Room Special Ventilation System.	SR 3.7.10.3	SR 4.4.2.B.3, 4.14.A, and 4.15.A	8

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-103	Increases CTS SR interval from at least once per operating cycle to 24 months on a staggered test basis to test the Control Room Special Ventilation System.	SR 3.7.10.4 and 3.7.13.4	4.14.B.1.c and 4.15.B.1.c	8
L3.7-114	Relaxes CTS requirements for entering into LCO 3.0.C when two MSIVs are inoperable at the same time by allowing separate Condition entry for each MSIV.	LCO 3.7.2 Cond C	Table 3.5-2B Action 27 and 3.0.C	4
L3.7-117	Eliminates CTS requirements of only allowing one of several conditions of inoperability existing at one time to allow simultaneous inoperabilities for the same equipment.	LCO 3.7.7 Cond B	LCO 3.3.C.1.b	4, 9
L3.7-118	Relaxes CTS requirements initiating a reactor shutdown if the control room boundary is not intact to allowing the boundary to be intermittently open under administrative controls. In addition, the ITS allows two CRSVS trains to be inoperable for 24 hours, due to control room boundary in MODES 1, 2, 3, and 4.	LCO 3.7.10 Cond B	LCO 3.13.A.1	1, 2, 9

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.7-17	Relocates specific CTS details of the OPERABILITY requirements for the condensate storage tank, including backup water supply requirements.	5.5.12, Bases Control Program	Bases	LCO 3.4.B.1.d	2, 3
LR3.7-18	Relocates specific CTS details of the OPERABILITY requirements for AFW system motor operated and manual valves, and condensate cross connect valve to the AFW system.	10CFR50.59	TRM	LCO 3.4.B.1.e, 3.4.B.1.f and 3.4.B.1.g	2, 3
LR3.7-19	Relocates CTS details on the conditions of inoperability for the AFW pump and associated valves.	5.5.12, Bases Control Program	Bases	LCO 3.4.B.2.a	2
LR3.7-24	Relocates specific CTS details for the motor driven AFW pump, piping and system valves.	5.5.12, Bases Control Program	Bases	LCO 3.4.B.2.b	2, 3
LR3.7-28	Relocates specific CTS details of inoperability conditions for the AFW backup supply of water from the cooling water system.	5.5.12, Bases Control Program	Bases	LCO 3.4.B.2.d	1, 2, 3
LR3.7-29	Relocates CTS details of inoperability conditions for AFW system valves. The ITS AFW system OPERABILITY and associated ACTIONS envelopes these requirements.	5.5.12, Bases Control Program	Bases	LCO 3.4.B.2.e	2, 3
LR3.7-38	Relocates CTS definition of specific components required to be OPERABLE. In the ITS, the specific equipment is included in the ITS in accordance with the definition of OPERABILITY.	5.5.12, Bases Control Program	Bases	LCO 3.3.C.1.a.(2) and 3.3.C.1.b(1)	1, 2

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.7-41	Relocates CTS details for equipment required to define two OPERABLE trains. In the ITS the specific equipment is included in accordance with the definition of OPERABILITY.	5.5.12, Bases Control Program	Bases	LCO 3.3.C.2	1, 2, 3
LR3.7-43	Relocates CTS details of equipment required to define two OPERABLE trains. In the ITS, the definition of OPERABILITY would include the additional equipment in addition of relocating details for the non-safeguards CL pumps.	10CFR50.59	TRM	LCO 3.3.D.1.a, and 3.3.D.1.c	1, 2, 3
LR3.7-63	Relocates specific CTS details of inoperability conditions and controls for the ABSVS.	5.5.12, Bases Control Program	Bases	LCO 3.6.E.2 and 3.6.E.3	2, 3
LR3.7-64	Relocates CTS details of supporting equipment for operability of ABSVS. In the ITS, LCO and associated ACTIONS envelopes these requirements.	5.5.12, Bases Control Program	Bases	LCO 3.6.F.1	2, 3
LR3.7-67	Relocates CTS details to continuously monitor radiation levels in the SFP area during fuel handling.	10CFR50.59	TRM	LCO 3.8.B.1.a	2, 3
LR3.7-68	Relocates CTS details to test fuel handling cranes prior to fuel handling.	10CFR50.59	TRM	LCO 3.8.B.1.b	2, 3
LR3.7-82	Relocates specific CTS details for the surveillance interval for the Steam Line Isolation - Manual Functional test.	NRC review of Program	IST	SR 4.7	3, 4

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.7-84	Relocates specific CTS schedule for performing the AFW pump SR test.	NRC review of Program	IST	SR 4.8.A.1	3, 4
LR3.7-86	Relocates CTS details for the SR testing of the AFW system discharge and motor-operated valves.	NRC review of Program	IST	SR 4.8.A.3 and 4.8.A.4	3, 4
LR3.7-87	Relocates CTS details that the AFW SR control board indications and visual indication operate properly.	5.5.12, Bases Control Program	Bases	SR 4.8.A.5	2, 3
LR3.7-98	Relocates specific CTS details for testing of Component Cooling Water System using control room indication.	5.5.12, Bases Control Program	Bases	SR 4.5.A.4.b, 4.5.A.5.a, 4.5.B.1.b, 4.5.B.1.c, 4.5.B.3.e, 4.4.B.2, and 4.4.B.3.c	2, 3
LR3.7-99	Relocates specific CTS details for inspecting each component cooling water diesel.	10CFR50.59	TRM	SR 4.5.A.5.b	3
LR3.7-100	Relocates specific CTS details for the ABSVS to actuate on a high radiation signal.	5.5.12, Bases Control Program	Bases	SR 4.4.B.3.c	2, 3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.7-102	Relocates specific CTS details for conducting the ventilation filter tests.	5.5.10, Ventilation Filter Test Program	VFTP	SR 4.14.A.1, 4.14.B, 4.4.B.3, 4.4.B.4, 4.4.B.5, 4.15.A.1, 4.15.B.1, 4.15.B.2, and 4.15.B.3	2, 3
LR3.7-112	Relocates specific CTS details to sample the Secondary coolant gross Beta-Gamma activity and Secondary coolant chemistry.	10CFR50.59	TRM	Table 4.1-2B Items 14, 16, and Note 6	3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.7-08	Increases the amount of equipment required to be OPERABLE to support the AFW system. The ITS requires entire train of AFW to be OPERABLE and not just selected equipment within the system.	LCO 3.7.5 Cond C and 3.7.6 Cond B	LCO 3.4.B.1.a and 3.4.B.2
M3.7-12	Adds new SR requiring verification that the AFW valves are locked, sealed or otherwise secured in position, are in the correct position.	SR 3.7.5.1	NA
M3.7-13	Adds a new LCO requiring two MSIVs to be OPERABLE.	LCO 3.7.2	NA
M3.7-14	Adds new Specification requiring two MFRVs and associated bypass valves to be operable.	LCO 3.7.3	NA
M3.7-15	Adds SRs requiring verification of the isolation time for the MFRV and MFRV bypass valves on an actual or simulated signal.	SR 3.7.3.1 and 3.7.3.2	NA
M3.7-16	Increases the CST volume of water required to 100,000 gallons for each unit.	LCO 3.7.6	LCO 3.4.B.1.d
M3.7-23 ¹	Increases the amount of equipment required to be OPERABLE to support the AFW system. The ITS requires entire train of AFW to be OPERABLE and not just selected equipment within the system.	LCO 3.7.5 Cond A and B	LCO 3.4.B.2.a
M3.7-26	Adds a new requirement to verify the cooling water supply availability within four hours and every 12 hours thereafter.	LCO 3.7.6 Cond A	LCO 3.4.B.2.c
M3.7-27	Adds a new SR requiring verification of the CST inventory every 12 hours.	SR 3.7.6.1	NA
M3.7-30	CTS requires the plant to shutdown to MODE 4 if the secondary chemistry is not within limits. The ITS requires the plant to shutdown to MODE 5.	LCO 3.7.14 Cond A	LCO 3.4.D

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.7-35	Eliminates CTS flexibility allowing one hour to prepare for initiating a reactor shutdown. The ITS deletes the one hour preparation time and requires initiation of reactor shutdown sooner.	LCO 3.7.14 Cond A	LCO 3.4.D
M3.7-37	Increases the amount of equipment required to be OPERABLE, by the CTS, to support the CC system. The ITS requires entire train of CC to be OPERABLE and not just selected equipment within the system.	LCO 3.7.7 Cond B	LCO 3.3.C.1.a.(1) and 3.3.C.1.b(1)
M3.7-39	Adds a new SR requiring verification that CC valves in flow paths to safety related equipment that are not locked, sealed, or otherwise secured in position, are in the correct position.	SR 3.7.7.1	NA
M3.7-42	Reduces CTS flexibility of listing the specific equipment required to be OPERABLE for the Cooling Water System by requiring the entire train of Cooling Water to be OPERABLE.	LCO 3.7.8	LCO 3.3.D.1
M3.7-46	Adds a specific Completion Time to the CTS of 4 hours to verify the vertical motor driven CL pump is operable.	LCO 3.7.8 Cond C	LCO 3.3.D.2.b and (2)
M3.7-48	Adds a new SR to the CTS requiring verification that CL valves in flow paths to safety related equipment that are not locked, sealed, or otherwise secured in position, are in the correct position.	SR 3.7.8.1	NA
M3.7-49	Adds a specific Completion Time to the CTS of 4 hours to verify with one Safeguards Traveling Screen inoperable, verify the sluice gate position.	LCO 3.7.9 Cond A	LCO 3.3.D.2.c
M3.7-51	Adds a specific Completion Time to the CTS of one hour to verify the sluice gate position.	LCO 3.7.9 Cond A	LCO 3.3.D.2.d
M3.7-52	Adds a specific Completion Time to the CTS of 1 hour to verify the sluice gate position.	LCO 3.7.9 Cond C	LCO 3.3.D.2.e

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.7-53	Adds new SR to the CTS requiring verification that the safeguards traveling screens are operable.	SR 3.7.9.1	NA
M3.7-55	Eliminates CTS flexibility allowing 1 hour to prepare for initiating a reactor shutdown. The ITS deletes the 1 hour preparation time and requires initiation of reactor shutdown sooner.	LCO 3.7.10 Cond F	LCO 3.13.A.1
M3.7-58	Eliminates CTS flexibility allowing two hours to stop fuel handling and placing the OPERABLE CRSVS train inservice. ITS requires these actions to be initiated immediately.	LCO 3.7.10 Cond E	LCO 3.13.A.1
M3.7-59	Adds new Specification, Required Actions and SRs requiring two safeguards chilled water trains to be operable.	LCO 3.7.11 Cond D	NA
M3.7-60	Adds new SR requiring monthly verification that the CL diesel fuel oil supply meets the required limits.	SR 3.7.8.3	NA
M3.7-61	Adds SRs requiring verification that each SCWS train actuates on an actual or simulated actuation signal in addition to the OPERABILITY of the SCWS components.	SR 3.7.11.1 and 3.7.11.2	NA
M3.7-65	Eliminates CTS flexibility of allowing one hour to prepare for initiating a reactor shutdown. The ITS deletes the one hour preparation time and requires initiation of reactor shutdown sooner.	LCO 3.7.12 Cond C	LCO 3.6.F.2
M3.7-73	Reduces the Completion Time to suspend movement of irradiated fuel from unlimited to immediately.	LCO 3.7.13	LCO 3.8.D.3
M3.7-75	Adds a new Specification requiring the fuel storage pool water level to exceed 23 feet over the top of irradiated fuel seated in the storage racks during irradiated fuel movement.	LCO 3.7.15	NA
M3.7-76	Adds a new SR requiring verification of the fuel pool level during movement of irradiated fuel.	SR 3.7.15.1	NA
M3.7-104	Increases CTS SR requirements from only requiring the Control Room Ventilation circuits to be operated monthly to operating the entire system.	SR 3.7.10.1, 3.7.12.1, and 3.7.13.1	SR 4.14.B.4, 4.4.B.4.d and 4.15.B.4

Table M – More Restrictive Changes
ITS Section 3.7 – Plant Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.7-107	Adds a new SR requiring verification of each fuel assembly prior to moving the assembly.	SR 3.7.17.1	SR 4.20
M3.7-108	Reduces CTS interval for performing the RCS activity level SR from every six months when the activity level is less than 10% of the limit, to every 31 days regardless the activity level.	SR 3.7.14.1	Table 4.1-2B Item 15 and Note 5
M3.7-109	Restricts CTS allowed outage time for the AFW equipment to a maximum of 10 days from discovery of failure to meet the LCO.	LCO 3.7.5 Cond B	LCO 3.4.B.2.a
M3.7-110	Restricts CTS allowed outage time for the Cooling Water pump or header to a maximum of 10 days from discovery of failure to meet the LCO.	LCO 3.7.8 Cond B and C	LCO 3.3.D.2.a and 3.3.D.2.b
M3.7-115	Increases the CTS volume of fuel oil supply required for the CL diesel from 19,000 to 19,500 gallons.	LCO 3.7.8	LCO 3.3.D.1.d
M3.7-116	Adds a new SR requiring the SG PORV block valves be manually cycled every 24 months.	SR 3.7.4.2	SR 4.8.B
M3.7-119	Adds Completion Time for closing an inoperable MSIV in 8 hours before initiating the shutdown track whereas the CTS does not provide any Completion Time.	LCO 3.7.2 Cond D	Table 3.5-2B Action 27
M3.7-121	Increases CTS requirements from requiring two PORVs OPERABLE to requiring two OPERABLE PORV lines. The ITS will require more equipment to be OPERABLE.	LCO 3.7.4	LCO 3.4.A.1.b

Table R – Relocated Specifications and Removed Details
ITS Section 3.7 – Plant Systems
(Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
R3.7-32	Relocated CTS Steam Exclusion System LCO and SR requirements.	TRM	10CFR50.59	LCO 3.4.C and SR 4.8.C	2, 5, 6
R3.7-69	Relocated CTS requirement to limit the number of recently discharged fuel assemblies stored in the small pool (Pool 1).	TRM	10CFR50.59	LCO 3.8.C	1, 5, 6
R3.7-79	Relocated CTS snubber LCO and SR requirements.	TRM	10CFR50.59	LCO 3.12, SR 4.13-1	2, 5, 6
R3.7-81	Relocated CTS requirements for periodic testing of the turbine stop valves, governor valves and intercept valves.	TRM	10CFR50.59	Table 4.1-2A	2, 5, 6
R3.7-106	Relocated Specification requirements to inspect AB crane lifting devices prior to handling heavy loads.	TRM	10CFR50.59	SR 4.19	2, 5, 6

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.8-01	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, into the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	LCO 3.8	LCO 3.7 and SR 4.6
A3.8-10	Did not include CTS requirements for all engineered safety features equipment associated with the OPERABLE DG to be OPERABLE. These requirements are "built in" the format of the ITS and LCO 3.0.6.	LCO 3.0.6 and LCO 3.8.1 Cond B and D	LCO 3.7.B.1 and 3.7.B.3
A3.8-13	Clarifies CTS requirements entering LCO 3.0.C due to the CTS into lack of have any specific Required Actions for the subject Condition. ITS does provide a specific Condition which is to enter LCO 3.0.3.	LCO 3.8.1 Condition G	LCO 3.0.C
A3.8-15	Reformats various CTS requirements by specifically identifying which Specification (s) apply for various plant conditions.	LCO 3.8.1, Condition D	VARIOUS
A3.8-17	Reformats CTS to ITS format and verbiage. In addition, ITS implements LCO 3.0.6 (SFDP) which is consistent with current operating practices of PI.	LCO 3.0.6, 3.8.1 Cond F, 3.8.4 Cond D, 3.8.7 Cond C, and 3.8.9 Cond A	LCO 3.7.B

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.8-20	Reformats and clarifies CTS requirements for two reactor protection instrument AC inverters inoperable.	LCO 3.8.7, Condition A and B	LCO 3.7.B.9
A3.8-22	Clarifies CTS by adding a specific Required Action to enter LCO 3.0.3 in the event that two trains with inoperable distribution subsystems result in a loss of safety function. This is consistent with the intent and practices of PI. Since the CTS does not have any specific Actions for this Condition, the plant would enter LCO 3.0.C.	LCO 3.0.3, and LCO 3.8.9, Condition E	LCO 3.0.C
A3.8-23	Clarifies CTS requirements for the service building electrical power subsystem components when being used for the safeguards DC electrical power subsystems during a plant outage. This is consistent with current plant procedures plant design, and past operating practices.	LCO 3.8.5	LCO 3.7.B
A3.8-25	Revises CTS fuel oil storage tank level to specify the total available fuel oil quantity. This change provides an accurate description of the PI design.	SR 3.8.3.1	SR 4.6.A.1.b
A3.8-30	Clarifies CTS statements by stating that only one DG be started at a time. This is current PI operating practices.	SR 3.8.1.3 Note 3	SR 4.6.A.1
A3.8-38	Did not include CTS non-pertinent information.	NA	SR 4.6.A.1.e, 4.6.A.2.c, and 4.6.A.3.b.2
A3.8-39	Clarifies CTS by specifically stating the requirements to verify fuel oil properties of new and stored fuel oil. This is consistent with current plant procedures and practices.	SR 3.8.3.2	SR 4.6.A.1.c
A3.8-40	Did not include non-pertinent CTS information by specifically stating that the fuel oil transfer pump is started and operating. If the pump is operating then it has been started.	NA	SR 4.6.A.1.d

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.8-51	Did not include non-pertinent CTS information.	NA	SR 4.6.A.1.e
A3.8-53	Clarifies CTS requirements by replacing the word tested with verify.	SR 3.8.4.1	SR 4.6.B.1
A3.8-56	Did not include CTS descriptive wording for MODES 1, 2, 3, and 4.	NA	LCO 3.7.A
A3.8-57	Clarifies CTS wording requiring determination that the OPERABLE DG is not inoperable due to common cause failure.	LCO 3.8.1 Condition B	LCO 3.7.B
A3.8-58	Revises CTS adding specific verbiage to more accurately reflect PI testing of the DGs.	SR 3.8.1.2	SR 4.6.A.1.e
A3.8-60	Reformatted CTS SR clarifying voltage and frequency testing requirements.	SR 3.8.1.6	SR 4.6.A.2.a
A3.8-62	Clarifies CTS requirements for the battery discharge test. For batteries during the first refueling and once every 5 years thereafter.	SR 3.8.6.6	SR 4.6.B.4
A3.8-63	Clarifies CTS that one 4 kV safeguards bus and/or its associated 480V bus including associated MCC may be inoperable or not fully energized for 8 hours provided the 4 kV safeguards bus and its associated 480V safeguards buses are verified to be OPERABLE and the DGs and safeguards equipment associated with the redundant train are OPERABLE.	LCO 3.8.9 Cond A	LCO 3.7.B.6
A3.8-68	Clarifies CTS intent by stating that if the DG fuel oil cannot be restored to within limits, declare the DGs inoperable and enter the applicable Conditions and Required Actions of LCO 3.7.8.	LCO 3.8.3, Condition D	NA

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.8-07	Eliminates CTS requirements for entry into LCO 3.0.C since there is not any specific Actions for feature(s) supported by an inoperable DG. The ITS provides specific Required Actions eliminating entry into LCO 3.0.3.	NA	LCO 3.7.B.1, 3.7.B.4, and 3.7.B.6.1, 3.0.C	4, 9
L3.8-09	Eliminates CTS requirements for the associated DG(s) to be tested within 24 hours if an offsite path is inoperable. The ITS does not require the DG testing and only requires verification of the other offsite path.	NA	LCO 3.7.B.2, 3.7.B.3, 3.7.B.3**, 3.7.B.4, 3.7.B.5, 3.7.B.6, and 3.7.B.9	3, 4
L3.8-11	Increases CTS Completion Time from 12 hours to 24 hours when two required paths from the grid to the 4 kV safeguards distribution system are inoperable.	LCO 3.8.1	LCO 3.7.B.4	6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.8– Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.8-12	Relaxes CTS requirements allowing 48 hours to restore fuel oil supply instead of declaring the DGs inoperable when the fuel oil gets to a specific level.	LCO 3.8.1 and 3.8.3 Cond A	LCO 3.7.A.5	6
L3.8-16	Relaxes CTS requirements of declaring supported equipment inoperable and potential shutdown by implementing ITS LCO 3.0.6 (SFDP).	LCO 3.8.9 Cond A, B and E	LCO 3.7.B.6	1, 4
L3.8-28	Relaxes CTS SR testing by allowing the performance of a modified start test for the DG.	SR 3.8.1.2 Notes 1 and 3	SR 4.6.A.1.e	3
L3.8-29	Increases CTS flexibility by not invalidating a SR if there is a momentary transient outside the load range of the DG.	SR 3.8.1.3 Notes 2, 3, and 4	SR 4.6.A.1.e	3
L3.8-35	Increases CTS Frequency from 18 months to 24 months for various testing of the DG.	SR 3.8.1.10	SR 4.6.A.3	8

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table L – Less Restrictive Changes
ITS Section 3.8– Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.8-36	Relaxes CTS requirements allowing credit to be taken for an actual signal to initiate the protective function being tested.	SR 3.8.1.10	SR 4.6.A.3.b and e	3
L3.8-46	Eliminates CTS SR for verifying the station battery fuses are good when the battery charger is running.	NA	SR 4.6.B.5	3
L3.8-59	Relaxes CTS requirements for testing the DG upon the associated DG failure to start. The ITS allows an evaluation to be performed to verify that the failure was not due to common cause.	LCO 3.8.1 Cond B	LCO 3.7.B.1	3, 4
L3.8-61	Eliminates CTS testing requirement that the DG be manually synchronized and loaded to a specific rating in less than 60 seconds and operate for at least one hour every 6 months.	NA	SR 4.6.A.2.b	3, 10

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.8 – Electrical Power Systems
(Summaries not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.8-02	Relocates CTS descriptive details on plant design for the electrical buses, DGs, and instrument panels.	10CFR50.59	USAR	LCO 3.7.A, 3.7.A.2, 3.7.A.3, 3.7.A.4, 3.7.A.5, 3.7.A.6, 3.7.A.7, and 3.7.B.9	1, 2
LR3.8-34	Relocates CTS SR details inspecting DG in accordance with procedures prepared per manufacturer's recommendations.	10CFR50.59	TRM	SR 4.6.A.3.a	3
LR3.8-37	Relocates CTS details for SR requirements for during the loss of offsite power in conjunction with a SI signal test, that operation of the emergency lighting system shall be ascertained.	10CFR50.59	TRM	SR 4.6.A.3.b.3	3
LR3.8-43	Relocates CTS details about testing battery cells, Frequency, and recording data.	10CFR50.59	TRM	SR 4.6.B.1, 4.6.B.2, and 4.6.B.3	3
LR3.8-44	Relocates CTS details about testing the DG full load carrying capability of the continuous rating for the emergency DG and information about its continuous rating.	10CFR50.59 and 5.5.12 Bases Control Program	USAR and Bases	SR 4.6.A.3.c	3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table LR – Less Restrictive – Relocated Details
ITS Section 3.8 – Electrical Power Systems
 (Summaries not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.8-45	Relocates CTS SR details verifying that all electrical connections are tight.	10CFR50.59	Battery Maintenance Program	SR 4.6.B.4	3

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.8-04	Adds new shutdown Specifications to CTS.	LCO 3.8.2, 3.8.5, 3.8.6, 3.8.8, and 3.8.10	NA
M3.8-06	Adds Required Action to CTS that within 24 hours determine OPERABLE DG is not made inoperable due to a common mode failure.	LCO 3.8.1 Condition B	3.7.B.1
M3.8-14	Adds new Specification to CTS for Diesel Fuel Oil testing.	LCO 3.8.3 Condition B, C, and D	NA
M3.8-18	Adds Completion Time requirements of 2 hours to CTS for verifying associated battery, other train charger, and DG and safeguards equipment on the other train.	LCO 3.8.4 Condition A	LCO 3.7B.7
M3.8-19	Adds a 2 hour Completion Time to CTS for verifying the other battery and both battery chargers are OPERABLE.	LCO 3.8.4 Condition B	LCO 3.7.B.8
M3.8-21	Adds new second Completion Time to CTS of 16 hours from discovery of failure to meet LCO for the reactor protection instrument AC panel.	LCO 3.8.9 Conditions B and C	NA
M3.8-24	Adds new SR Frequency to CTS from discharging the batteries every 5 years to verify battery capacity of the battery > 80% of the manufacturer's rating every 5 years and 12 month when the battery shows degradation, or reached 85% of the expected life.	SR 3.8.6.6	SR 4.6.B.4
M3.8-27	Adds new SR to CTS verifying correct breaker alignment and indicated power availability for each qualified path every 7 days.	SR 3.8.1.1	NA

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.3-31	Adds SR requirements to CTS stating that another SR shall be performed immediately following, without shutdown, the DG test.	SR 3.8.1.3 Note 4	SR 4.6.A.1.e
M3.8-41	Adds new SRs to CTS for the shutdown Specifications.	LCO 3.8.2, 3.8.5, 3.8.6, 3.8.8, and 3.8.10	NA
M3.8-42	Adds new SRs to CTS verifying correct breaker alignments and voltage to safeguards AC, DC, and reactor protection instrument AC electrical power distribution subsystems within 7 days.	SR 3.8.9.1 and 3.8.10.1	NA
M3.8-47	Adds new SR to CTS requiring verification that each battery charger supplies a specific current rating and float voltage every 24 months.	SR 3.8.4.2	NA
M3.8-49	Adds new SR to CTS to verify correct inverter voltage and alignment to the Reactor Protection Instrumentation AC panels every 7 days.	SR 3.8.7.1	NA
M3.8-50	Increases CTS SR Frequency from every 3 months to monthly for verifying the water level in the battery cell.	SR 3.8.6.3	SR 4.6.B.2
M3.8-52	Increases CTS SR Frequency from testing the batteries monthly to every 7 days.	SR 3.8.4.1	SR 4.6.B.1

Table M – More Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.8-55	Increases CTS SR requirements. CTS requires the buses, which verify the DGs start, whereas the ITS requires the loads for the DG to be verified.	SR 3.8.1.10	SR 4.6.A.3.b.2
M3.8-64	Increases CTS requirements by adding a second Completion Time of 14 days from discovery of failure to meet the LCO when one DG and one offsite path are inoperable.	LCO 3.8.1 Cond B	LCO 3.7.B.1 and 3.7.B.2
M3.8-65	Adds new requirements to CTS that with one DC electrical power subsystem inoperable , for other reasons, restore DC electrical power subsystem to OPERABLE within 2 hours.	LCO 3.8.4 Condition C	NA
M3.8-66	Adds new SR to CTS requiring a battery service test to verify design requirements of the DC electrical power system.	SR 3.8.4.3	NA
M3.8-67	Increases CTS requirements by adding a second Completion Time of 16 hours from discovery of failure to meet the LCO.	LCO 3.8.9 Cond A and B	LCO 3.7.B.6
M3.8-69	Adds a new SR to CTS requiring that on a 24 month basis, either by a simulated or actual loss of offsite power, the DG start on auto-start.	SR 3.8.1.11	SR 4.6.A.3.b.1

Table R – Relocated Specifications and Removed Details
ITS Section 3.8 – Electrical Power Systems
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.9-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431.	LCO 3.9	Table TS.1-1, 3.8, Table TS.4.1-2A, and Table TS.4.1-2B
A3.9-02	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	LCO 3.9	LCO 3.8
A3.9-03	Revises CTS format such that each specification in the Refueling Operations Section contains its own Applicability and the CTS specifications are marked up to correspond to these Applicabilities.	LCO 3.9	LCO 3.8.A.1
A3.9-05	Rewords CTS by adding the words "when connected " and "limits are met" clarifying the intent of the CTS.	LCO 3.9.1	Table 1-1
A3.9-06	Clarifies CTS that containment closure requires four bolts required to hold the equipment hatch in place when it is considered closed which is consistent with the CTS.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-07	Restates CTS requirements which allow for at least one isolation valve to be OPERABLE (that is by automatic closure) or locked.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-10	Rewords CTS requirements for isolation of lines which penetrate containment and provide a direct path from containment atmosphere to the outside atmosphere.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-12	Rewords CTS requirements making minor editorial changes.	LCO 3.9.4	LCO 3.8.A.1.a.2

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A3.9-14	Did not include CTS clause, "following a fuel handling accident in containment" as the basis for requiring an OPERABLE air lock or operating containment fan coil. It is understood that the purpose of this Specification is to mitigate the consequences of a fuel handling accident in containment since that is the regulatory basis for a Refueling Operations LCO.	NA	LCO 3.8.A.1.a.2.b
A3.9-26	Restates CTS Applicability statements consistent with the ISTS.	LCO 3.9	LCO 3.8.A.1.d
A3.9-28	Restates CTS applicability of this specification to apply to movement of fuel assemblies "in containment".	LCO 3.9.2	LCO 3.8.A.1.e
A3.9-47	Clarifies CTS Action Statements to incorporate the Applicability changes for each individual specification were discussed previously.	LCO 3.9.2, Condition A, 3.9.3, 3.9.4, Condition A, 3.9.5, Condition A. and 3.9.6	LCO 3.8.A.2 and 3.8.A.3
A3.9-48	Restates CTS requirements allowing for not reducing boron concentration.	LCO 3.9.5 and 3.9.6	LCO 3.8.A.3
A3.9-50	Clarifies CTS requirements for equipment hatch and penetration closure.	LCO 3.9.5 and 3.9.6	LCO 3.8.A.3
A3.9-52	Clarifies CTS required actions for when the one RHR pump is not operating and the water level is below 20 ft above the reactor vessel flange.	LCO 3.9.2	LCO 3.8.A.2

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.9-04	Relaxes CTS requirements from considering accidents postulated to occur during core alteration, inadvertent criticality (inadvertent loading of, and subsequent operation with a fuel assembly in an improper location) to only considering the fuel handling accident.	LCO 3.9.4	LCO 3.8.A.1.a	2
L3.9-31	Eliminates CTS requirements to verify water level prior to moving fuel or control rods. The ITS only requires water level to be verified prior to commencing movement of fuel.	SR 3.9.2.1	LCO 3.8.A.1.e, Table 4.1-2A Test 5	3
L3.9-34	Eliminates CTS requirement from allowing the operating RHR pump to be shut down for up to one hour to facilitate movement of fuel or core components to allow the RHR pump to be shutdown for one hour for any reason.	LCO 3.9.6	LCO 3.8.A.1.f	1, 4, 6
L3.9-49	Reduces CTS Frequency from daily to 3 days for verification of boron concentration.	LCO 3.9.1.1	Table 4.1-2B, Note 5	10
L3.9-54	Relaxes CTS requirements requiring two RHR loops OPERABLE to allowing one pump to be inoperable for up to 2 hours for SR testing.	LCO 3.9.6, Note 2	LCO 3.8.A.1.g	1, 4, 6

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR3.9-01	Relocates specific SDM details for all analyzed plant refueling conditions.	Methodology	COLR	Table 1-1	1
LR3.9-13	Relocates specific CTS details for equipment needing to be OPERABLE following a fuel handling accident in containment.	5.5.12, Bases Control Program	Bases	LCO 3.8.A.1.a.(2)(b)(i) and 3.8.A.1.a.(2)(b)(iv)	1, 2, 3
LR3.9-17	Relocates specific CTS details for containment radiation monitors, which provide monitoring for personnel safety.	10CFR50.59	TRM	LCO 3.8.A.1.b	1, 2
LR3.9-18	Relocates specific CTS details for the neutron flux monitor to have continuous visual indication in the control room.	5.5.12, Bases Control Program	Bases	LCO 3.8.A.1.c	1
LR3.9-27	Relocates specific CTS details to maintain 23 feet of water above the reactor vessel flange during movement of control rods out of the reactor vessel.	10CFR50.59	TRM	LCO 3.8.A.1.e	2
LR3.9-44	Relocates specific CTS details for communication between the control room and containment.	10CFR50.59	TRM	LCO 3.8.A.1.h	2
LR3.9-46	Relocates CTS restriction for moving fuel prior to 100 hours after the reactor is subcritical.	10CFR50.59	TRM	LCO 3.8.A.1.i	2

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Section 3.9 – Refueling Operations
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.9-08	Adds new Condition, Required Actions, Completion Times, and SRs if the boron concentration is not within limits.	LCO 3.9.1, Condition A	Table 1-1
M3.9-16	Adds SRs requiring verification of containment purge and inservice purge penetration status every 7 days and verification of inservice purge valve actuation every 24 months.	SR 3.9.4.1 and 3.9.4.2	LCO 3.8.A.1.a.2.b.iv
M3.9-21	Expands the CTS MODE of APPLICABILITY for monitoring the core subcritical neutron flux from whenever the core geometry is changed to MODE 6.	LCO 3.9.3, Applicability	LCO 3.8.A.1.c
M3.9-22	Adds an Action Statement requiring additional verification of boron concentration once per 12 hours if both neutron flux monitors are inoperable.	LCO 3.9.3, Condition B	LCO 3.8.A.1.c
M3.9-23	Adds an Action Statement requiring additional verification of boron concentration once per 12 hours if the audible count rate indication is not operable.	LCO 3.9.3, Condition C	LCO 3.8.A.1.c
M3.9-24	Adds SRs requiring a CHANNEL CHECK every 12 hours and a CHANNEL CALIBRATION every 24 months of the neutron flux monitors.	SR 3.9.3.1 and 3.9.3.2	LCO 3.8.A.1.c
M3.9-32	Expands CTS Applicability from requiring one RHR pump to be OPERABLE and operating during CORE ALTERATIONS to requiring one RHR pump OPERABLE and operating during all of MODE 6.	LCO 3.9.5 and 3.9.6	LCO 3.8.A.1.f
M3.9-33	Eliminates CTS flexibility of allowing an RHR pump to be shutdown for up to 1 hour over an unlimited period to one hour per 8 hour period.	LCO 3.9.5, Note	LCO 3.8.A.1.f
M3.9-36	Adds a new SR requiring verification every 12 hours that the RHR loop is in operation.	SR 3.9.5.1	NA

Table M – More restrictive Changes
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M3.9-37	Increases CTS MODE of APPLICABILITY from specific operations during MODE 6 to whenever the unit is in MODE 6.	LCO 3.9.6	LCO 3.8.A.1.g
M3.9-43	Adds SRs requiring verification that one RHR loop is in operation every 12 hours and verify proper breaker alignment and power available to the other RHR pump every 7 days.	SR 3.9.6.1 and 3.9.6.2	NA
M3.9-51	Adds new requirements to verify that the containment purge system will isolate when a required RHR pump is not operating.	LCO 3.9.5, and 3.9.6	LCO 3.8.A.3
M3.9-53	Eliminates CTS flexibility of allowing an RHR pump to be shutdown for up to one hour over an unlimited period to one hour per 8 hour period in addition to adding restrictions on temperature, and dilution and draining operations.	LCO 3.9.6, Note 1	LCO 3.8.A.1.f

Table R – Relocated Specifications and Removed Details
ITS Section 3.9 – Refueling Operations
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Chapter 4.0 – Design Features
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A4.0-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NURGE-1431.	4.3.1	5.1, 5.3, and 5.6
A4.0-02	Revises CTS description of the reactor core to conform to ISTS format.	4.2	5.3.A
A4.0-06	Revises CTS requirements to include a statement for the spacing of new fuel storage and change references to other sections of the CTS to agree with the ITS location of the information.	4.3.1	5.6.A
A4.0-07	Includes a new statement specifying that the spent fuel pool design prevents draining the pool which replaces CTS statements.	4.3.2	5.6.B
A4.0-09	Revises CTS description of fuel storage capacity.	4.3.3	5.6.D
A4.0-11	Includes reference to TN-40 earlier in the paragraph.	4.3.1	5.6.A.3

Table L – Less Restrictive Changes
ITS Chapter 4.0 – Design Features
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L4.0-03	Relaxes CTS intent by limiting fuel assemblies to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases.	4.2	5.3.A	7

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Chapter 4.0 – Design Features
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR4.0-01	Relocates CTS descriptive information for the containment design features.	10CFR50.59	USAR	5.2	1
LR4.0-04	Relocates description for the RCS and reactor protection systems to the USAR, but will not be transcribed verbatim to the USAR.	10CFR50.59	USAR	5.3.B and 5.3.C	1
LR4.0-08	Relocates description of the spent fuel storage design features.	10CFR50.59	USAR	5.6.B and 5.6.C	1

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Chapter 4.0 – Design Features
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
NONE	NONE	NONE	NONE

Table R – Relocated Specifications and Removed Details
ITS Chapter 4.0 – Design Features
 (Summaries not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication

Table A – Administrative Changes
ITS Chapter 5.0 – Administrative Controls
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A5.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	5.1	6.1
A5.0-04	Restates CTS requirements to the Steam Generator (SG) tube surveillance Program as an administrative control requirement.	5.0	4.12.A
A5.0-05	Restates CTS requirements for Steam Generator (SG) tube surveillance Program in the administrative controls.	5.0	4.12.E
A5.0-06	Revises section, paragraph, numbering, and punctuation.	5.0	6.0
A5.0-07	Rewords CTS requirements to be consistent with 10CRF50.59.	5.0	6.5.L.2.b
A5.0-11	Did not include CTS requirements for shift manning since they are included in 10 CFR50.54(m)(i)(iii) and 50.54(k).	NA	6.2.B
A5.0-12	Replaces CTS specific personnel job titles with general job titles.	5.0	6.2 and 6.5
A5.0-13	Revises CTS minor wording changes to make it consistent with ISTS as currently modified by travelers.	5.2.2.b	6.2 and 6.4
A5.0-14	Did not include CTS containment spray system (CS), by design, as one of the example systems in the primary coolant sources outside containment.	NA	6.5.B
A5.0-16	Clarifies to assure proper understanding when complying with 10 CFR 55.4 requirements.	5.3	6.3
A5.0-24	Revises requirements with respect to the applicability of CTS 4.0.A and 4.0.B to properly interface with the ITS SR 3.0.3 requirements and 10 CFR 50 Appendix J.	5.5.14	6.5.M

Table A – Administrative Changes
ITS Chapter 5.0 – Administrative Controls
(Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
A5.0-26	Clarifies reporting requirements stating that a single submittal may be made for the plant combining sections common to a two unit plant.	5.6.1	6.6.A, 6.6.B and 6.6.C
A5.0-27	Did not include CTS requirements for monthly reporting of challenges to the pressurizer power operated relief valves or pressurizer safety valves.	NA	6.6.D
A5.0-28	Includes COLR reference to latest Prairie Island Plant approved steam line break methodology.	5.5.5	6.5.E
A5.0-31	Replaces CTS list of limits and corresponding TS with a new list of ITS specifications which reference the COLR. Each of these ITS specifications either corresponds to a CTS which references the COLR or justification was previously provided in the appropriate ITS package for relocating the limit to the COLR.	5.6.5	6.6.E
A5.0-32	Replaces CTS list of TS referencing the PTLR with a new list of ITS specifications which reference the PTLR. Each of these ITS specifications either corresponds to a CTS which references the PTLR or justification was previously provided in the appropriate ITS package for relocating the limit to the PTLR.	5.6.6	6.6.F
A5.0-33	Revises CTS requirements for high radiation area updating the acceptable alternate controls to those given in 10 CFR 20.1601 which provide an equivalent level of radiation protection to that currently provided.	5.7	6.7
A5.0-34	Revises CTS Section titles to agree with the recommendations of Regulatory Guide 8.38 which will assure that adequate protection is provided without unnecessary radiation exposure.	5.7.1 and 5.7.2	6.7.A and 6.7.B
A5.0-36	Restates PI requirements for battery monitoring and maintenance.	5.5.15	6.5
A5.0-38	Restates CTS reporting requirement for EM as an administrative report.	5.0	5.6

Table L – Less Restrictive Changes
ITS Chapter 5.0 – Administrative Controls
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L5.0-21	Increases CTS flexibility in scheduling by incorporating the provisions of ITS SR 3.0.2 and SR 3.0.3 to the Radioactive Effluent Controls Program.	5.5.4	6.5.D	10

CHANGE TYPES

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action
5. Relaxation of CTS Reporting Requirements
6. Relaxation of Completion Time
7. Deletion of Requirements Redundant to Regulations or Design Information
8. Relaxation of Surveillance Frequency from 18 months to 24 months
9. Relaxation of CTS 3.0.C Requirements
10. Relaxation of SR Frequency

Table LR – Less Restrictive – Relocated Details
ITS Chapter 5.0 – Administrative Controls
 (Not listed sequentially)

DOC No.	Summary	Control Change Process	Location	CTS Sect	Change Type
LR5.0-01	Relocates CTS ASME Section XI Inservice Inspection (ISI) requirements including definition of corrective measures and record keeping requirements.	NRC approval	ISI	4.2.A.1, 4.2.B, and 4.2.C	4,
LR5.0-02	Relocates CTS requirements for inservice testing to the Inservice Testing (IST) Program.	5.5.7, Inservice Testing Program, NRC approval	IST	4.2.A.2	4
LR5.0-03	Relocates CTS requirements for reactor coolant pump flywheel inspection to Administrative Controls Section 5.5, Reactor Coolant Pump Flywheel Inspection Program.	5.5.6, Reactor Coolant Pump Flywheel, 10CFR50.59	RCPFIP	Table 4.2-1 and 6.5.F	4
LR5.0-22	Relocates CTS requirements for testing of safety related ventilation filters to the Ventilation Filter Test Program (VFTP), a new program in the ITS Administrative Controls Section 5.5.	5.5.9, Ventilation Filter Testing Program	VFTP	6.5.I	4

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References

Table M – More Restrictive Changes
ITS Chapter 5.0 – Administrative Controls
 (Not listed sequentially)

DOC No.	Summary	ITS Section	CTS Section
M5.0-17	Adds CTS requirements by incorporating the requirements of the "new" 10 CFR Part 20.	5.5.4	6.5.D
M5.0-23	Adds a new program, Safety Function Determination Program, requiring a system OPERABILITY evaluation be performed whenever LCO 3.0.6 is entered.	5.5.13	NA
M5.0-37	Adds a new requirement specifying that the duty shift manager shall hold an SRO license.	5.2.2.c	6.2

Table R – Relocated specifications and Removed Details
ITS Chapter 5.0 – Administrative Controls
 (Not listed sequentially)

DOC No.	Summary	Location	Change Control Process	CTS Sect	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPES

1. Details of System Design and System Description including Design Limits
2. Description of System or Plant Operation
3. Procedural Details for Meeting TS Requirements and Relocated Reporting Requirements
4. Redundant Requirement References
5. Relocated Specification not meeting 10 CFR 50.36 (c)(2)(ii) criteria
6. Relocated Specification/Surveillance Requirement/ Administrative Control Requirement
7. Performance Required for Indication