ATTACHMENT 2

Table A - Administrative Changes Matrix

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	1.0	1.0, 4.1.A footnote *, 4.2.A footnote *, RETS 1.0
A2	The CTS introductory note, which discusses the reasons for the Definitions, is replaced with a more specific "Note" in ITS Section 1.1, before the first definition.	1.0	1.0
A3	Deleted reportable event definition.	N/A	1.0.A
A4	The definition of Cold Condition has been incorporated into the MODES Table as MODE 4.	Table 1.1-1	1.0.C, 1.0.I.3.b
A5	Adds Sections 1.2, Logical Connector, 1.3, Completion Times, and 1.4 Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2, 1.3, 1.4	N/A
A6	Deletes CTS definitions of Functional Test, Instrument Channel, Protective Actuation, Protective Function, Simulated Automatic Actuation, Sensor, Limiting Condition for Operation (LCO), Limiting Safety System Setting (LSSS), Reactor Vessel Pressure, Transition Boiling, Electrically Disarmed Control Rod, Rated Recirculation Flow, Top of Active Fuel, Rod Density, Purge-Purging, and Venting, and deletes RETS definitions of Instrument Channel Calibration, Instrument Channel Functional Test, Instrument Check, Logic System Functional Test, Member(s) of the Public, Off Gas Treatment System, Operable, Process Control Program (PCP), Rated Thermal Power, Solidification, Source Check, Treatment, and Unrestricted Area, since Specifications referring to them no longer contain their use, or no longer are retained in the FitzPatrick ITS.	N/A	1.0.F.1, 1.0.F.3, 1.0.F.8, 1.0.F.9, 1.0.F.11, 1.0.F.13, 1.0.G, 1.0.H, 1.0.P, 1.0.U.4, 1.0.V, 1.0.Y, 1.0.Z, 1.0.AA, 1.0.AB, and 1.0.AC; RETS 1.0.B, 1.0.C, 1.0.D, 1.0.E, 1.0.F, 1.0.G, 1.0.I, 1.0.J, 1.0.K, 1.0.M, 1.0.N, 1.0.O, and 1.0.P

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	Revises the wording for the definition of Instrument Channel Calibration to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" actuation, alarm, or trip function, and conversely, some channels may have a "required" display function. Therefore, the word "required" has been included. In addition, specific CHANNEL CALIBRATION requirements for RTDs and thermocouples are added to the definition of Instrument Channel Calibration. Also, the definition of Instrument Channel Calibration has been modified to provide an allowance to perform the test "by means of any series of sequential, overlapping, or total channel steps."	CHANNEL CALIBRATION definition	1.0.F.2
A8	The phrase "or actual," in reference to the injected signal for the Instrument Channel Functional Test, has been added as an explicit option to the currently required simulated signal. Revises the wording for the definition of Instrument Channel Functional Test to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" alarm and/or initiating action, therefore, the word "required" has been included. Also, the definition of Instrument Channel Functional Test has been modified to provide an allowance to perform the test "by means of any series of sequential, overlapping, or total channel steps."	CHANNEL FUNCTIONAL TEST definition	1.0.F.5
A9	Revises the wording for the definition of LSFT to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" relay, contact, trip unit, or solid state logic element, and conversely, some channels may have a "required" display function. Therefore, the word "required" has been included.	LOGIC SYSTEM FUNCTIONAL TEST definition	1.0.F.7
A10	The MCPR and MFLPD definitions have been revised for clarity and for consistency with the ISTS wording.	MINIMUM CRITICAL POWER RATIO and MAXIMUM FRACTION OF LIMITING POWER DENSITY definitions	1.0.U.1, 1.0.U.2, and 1.0.U.3
A11	Modifies the definition of Operable to a) change the word "or" in reference to cooling or seal water to "and"; b) change the word "or" in reference to other auxiliary equipment to "and"; and c) changes the word "and" in reference to normal and emergency electrical power sources to "or". Currently, when one source is not available, the definition of Operable alone requires the supported features to be declared inoperable. However, CTS LCO 3.0.E allows the features to be considered Operable provided at least one source of power is still available and their redundant features are Operable. CTS LCO 3.0.E requirements are incorporated into ITS LCO 3.8.1 ACTIONS for when a diesel or offsite power source is inoperable.	OPERABLE-OPERABILITY definition	1.0.J
A12	Deletes the portion of the Rated Power definition that refers to a steady state nuclear steam supply output, since this is consistent with the license condition (the license condition refers to a specific reactor power level only).	RATED THERMAL POWER definition	1.0.N
A13	Modifies the definition of Staggered Test Basis, allowing the minimum Surveillance interval to be specified in the Surveillance Requirements' Frequency column of the applicable LCOs, independent of the number of subsystems.	STAGGERED TEST BASIS definition	1.0.X

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A14	The definitions of Primary Containment Isolation Actuation Instrumentation Response Time and RPS Response Time have been modified with an allowance to not measure the response times of certain components, provided that the components and methods for verification have been previously reviewed and approved by the NRC.	RPS RESPONSE TIME and ISOLATION INSTRUMENTA-TION RESPONSE TIME	1.0.F.6, 1.0.F.10, 4.1.A footnote *, 4.2.A footnote *
A15	Adds the definitions of ACTIONS, AVERAGE PLANAR LINEAR HEAT GENERATION RATE, LEAKAGE, LINEAR HEAT GENERATION RATE, SHUTDOWN MARGIN, THERMAL POWER, and TURBINE BYPASS SYSTEM RESPONSE TIME.	ACTIONS, AVERAGE PLANAR LINEAR HEAT GENERATION RATE, LEAKAGE, LINEAR HEAT GENERATION RATE, SHUTDOWN MARGIN, THERMAL POWER, TURBINE BYPASS SYSTEM RESPONSE TIME definitions	N/A
A16	The Primary Containment Isolation Actuation Instrumentation Response Time definition for the Main Steam Isolation Valves (MSIV) has been modified to address the ISOLATION INSTRUMENTATION RESPONSE TIME of all isolation valves.	ISOLATION INSTRUMENTA-TION RESPONSE TIME	1.0.F.6
A17	Adds the average reactor coolant temperature, the reactor vessel head closure bolt tensioning, and that fuel is in the vessel requirements to the definition of Mode.	MODE definition	1.0.I
A18	Deletes the definition of Surveillance Frequency Notation/Intervals since the all SR Frequencies in the FitzPatrick ITS are directly specified.	N/A	1.0.T
A19	Deletes the definition of Trip System since it is not necessary.	N/A	1.0.F.12
A20	Deletes the definition of Operating since it is not necessary.	N/A	1.0.K
A21	Deletes the definitions of Operating Cycle and Refueling Outage since all SR Frequencies in the FitzPatrick ITS are directly specified as a time (e.g., 24 months).	N/A	1.0.L, 1.0.Q

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A22	Deletes the definitions of Primary Containment Integrity and Secondary Containment Integrity; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section.	N/A	1.0.M, 1.0.S
A23	Deletes the definition of Safety Limits since it is duplicative of 10 CFR 50.36 and ITS Chapter 2.0.	N/A	1.0.R
A24	The definitions of Refuel Mode, Run Mode, Shutdown Mode (cold and hot shutdown), and Startup/Hot Standby have been included in the ITS MODES Table.	Table 1.1-1	1.0.I.1, 1.0.I.2, 1.0.I.3, 1.0.I.4
A25	Deletes the portion of the Refuel Mode definition stating that the refueling interlocks are in service when the mode switch is in the refuel position.	N/A	1.0.I.1
A26	Deletes the portion of the Run Mode definition that the Reactor Protection System is energized with APRM protection (excluding the 15% high flux trip) and the RBM interlocks are in service when the mode switch is in the run position.	N/A	1.0.I.2
A27	Deletes the portions of the Startup/Hot Standby definition that the low pressure main steam line isolation valve closure trip is bypassed, the Reactor Protection System is energized with APRM (15 percent), and IRM neutron monitoring system trips and control rod withdrawal interlocks are in service when the mode switch is in the startup/hot standby position.	N/A	1.0.I.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	2.0	1.1, 1.2, 6.7
A2	The CTS requirement, that in the event of a SL violation reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i), has been deleted, since it is duplicative of 10 CFR 50.36.	N/A	6.7.(A)
A3	The Applicability of the Reactor Coolant System Pressure Safety Limits has been changed from "at any time when irradiated fuel is present in the reactor vessel" to "in all MODES."	2.1.2	1.2.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	3.0	3/4.0
A2	The CTS phrase "Limiting Conditions for Operation...shall be applicable..." has been replaced with the phrase "LCOs shall be met..." In addition the ITS identifies specific exceptions to other LCO Applicabilities thus eliminating any interpretations that may be required, and avoiding any confusion.	LCO 3.0.1	3.0.A
A3	The CTS words that state that the LCO is complied with if the Actions are completed (within the specified time interval) or if the LCO is restored prior to the time interval expiring have been reworded to be consistent with the format of other LCO 3.0 Specifications. In addition, the ITS identifies specific exceptions to other LCO Applicabilities thus eliminating any interpretations that may be required, and avoiding any confusion.	LCO 3.0.2	3.0.B
A4	A phrase has been added to the CTS for clarity. The ITS includes the phrase "LCO 3.0.3 is only applicable in MODES 1, 2, and 3." This phrase has been added since CTS provides no guidance in this area. No further ACTIONS would be required to be performed if the plant were already in MODE 4 or 5 since the CTS only requires the plant to be placed in MODE 4.	LCO 3.0.3	3.0.C
A5	Two CTS Surveillance Requirements, 4.0.A and 4.0.C have been combined to form ITS SR 3.0.1. ITS SR 3.0.1 rewords the current requirements to be consistent with the format of other LCO 3.0 Specifications. ITS SR 3.0.1 also adds clarifying words specifying that "failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." CTS implies that failure to meet the Surveillance means failure to meet the LCO, however ITS SR 3.0.1 provides this information in a clearer manner.	SR 3.0.1	4.0.A, 4.0.C
A6	The CTS allows the Surveillance Frequency to be extended by 25% each Surveillance interval. The ITS rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. The ITS also adds the sentence "Exceptions to this Specification are stated in the individual Specifications," to acknowledge the explicit use of exceptions in various Surveillances. The basic application of the 25% extension to routine Surveillances is maintained.	SR 3.0.2	4.0.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	When it is determined that a Surveillance Requirement has not been performed, the CTS provides allowances for delay into the ACTIONS requirements for up to 24 hours for those specifications which include out of service times of less than 24 hours. The CTS has been revised to explicitly state the required ACTIONS if the Surveillance is not performed within the delay period or if the Surveillance is performed within the delay period but it is not met. The ITS requires the LCO to be immediately declared not met, and the applicable Condition(s) to be entered if the Surveillance is not performed within the delay period. The ITS also requires these same actions when the Surveillance is performed within the delay period but is not met.	SR 3.0.3	4.0.C
A8	The CTS does not permit entry into a MODE or other specified condition when an LCO is not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Exceptions to these requirements are stated in the individual specifications. The ITS rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. In addition, ITS LCO 3.0.4 states that the LCO is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.	LCO 3.0.4	3.0.D
A9	The CTS states that this LCO is an exception to LCO 3.0.B (ITS 3.0.2). The ITS includes these requirements and also adds clarifying words specifying that the exception to LCO 3.0.2 is for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY. This clarification eliminates any interpretations that may be required, and avoids any confusion.	LCO 3.0.5	3.0.F
A10	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate actions to be taken when a single inoperability (e.g., a support system) also results in the inoperability of one or more related systems (e.g., supported system(s)). The existing Technical Specifications and various NRC guidance documents have not provided a consistent approach to the combined support/supported inoperability.	LCO 3.0.6	N/A
A11	A requirement has been added to CTS 3.0.C that requires entry into LCO 3.0.3 when directed by the associated ACTIONS. This requirement is not included in the CTS since no specification explicitly directs entry into CTS 3.0.C. Since the ITS also uses this method of entry into LCO 3.0.3, this statement must be included. Changes to Specifications to explicitly require direct entry into LCO 3.0.3 (e.g., ITS 3.5.1) in the ITS if certain conditions are not met, are discussed in the Discussion of Changes for the specific Specification.	LCO 3.0.3	3.0.C

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SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A12	The CTS does not permit entry into a MODE or other specified condition when an LCO's Surveillances have not been met within the applicable interval or as otherwise stated. The ITS rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. In addition, the ITS states that the SR is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.	SR 3.0.4	4.0.D
A13	Not used.	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.3.A.1
A2	The CTS requires a sufficient number of control rods to be Operable so that the core could be made subcritical in the most reactive condition during the operating cycle with the strongest control rod fully withdrawn and all other operable control rods fully inserted. The ITS 3.1.1 LCO has been editorially rewritten to require the Shutdown Margin (SDM) to be $\geq$ 0.38% Δk/k, with the highest worth control rod analytically determined.	LCO 3.1.1	3.3.A.1
	3.1.2, REACTIVITY ANOMALIES		
A1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.3.D, 3.3.E
A2	The CTS in part requires that if Reactivity Anomalies exceed the limit, the reactor will be shutdown "until the cause has been determined, and corrective actions have been taken as appropriate." These words have been deleted; however, the proposed deletion of these words will not change this requirement since the ITS requires that the plant be shutdown to MODE 3 within 84 hours of finding Core Reactivity differences not within limits, and the ability to change MODES is generically controlled by the provisions of LCO 3.0.4 which states in part that "when an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."	3.1.2 ACTIONS A and B, LCO 3.0.4	3.3.D
A3	The Frequency for the Reactivity Anomalies Surveillance of "During the Startup test program" has been deleted from the CTS since this test program has already occurred and will not be repeated again.	N/A	4.3.D
A4	CTS 4.3.D is revised to replace the term "reactivity monitoring" with "reactivity measuring." Core reactivity is a calculated value and is not displayed as a continuous readout, which is analogous to a "monitored" value. Rather core reactivity is "measured" by considering actual control rod densities and performing appropriate calculations.	SR 3.1.2.1	4.3.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.3, CONTROL ROD OPERABILITY		
A1	Editorial changes, reformatting, and revised numbering. In addition, the ITS Control Rod Operability Specification explicitly includes all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion. The ITS also explicitly includes the following: a) All inoperable control rods (except stuck rods) are required to be fully inserted and disarmed; b) A control rod is considered "inoperable" and "stuck" if it is incapable of being inserted. Requirements are retained to preserve Shutdown Margin for this situation and the control rod is required to be disarmed; c) A control rod is considered "slow" when it is capable of providing the scram function, but may not be able to meet the assumed time limits. The scram reactivity used in the safety analysis allows for a specified number of slow rods. d) Special considerations are provided for non-conformance to the banked position withdrawal sequence (BPWS), due to inoperable control rods, at $\leq$ 10% of Rated Thermal Power. Also, ITS 3.1.3 Action Table Note, "Separate Condition entry is allowed for each control rod," and a Note to ITS 3.1.3 Required Action for Condition A and Required Action C, which allows for bypassing the Rod Worth Minimizer (RWM) if necessary for continued operation, have been exclusively included.	3.1.3, 3.1.3 ACTIONS Note, 3.1.3 Condition A and Required Action C.1 Notes	3/4.3.A.2, 3/4.3.B.1, 3/4.3.B.2, 3/4.3.C.3
A2	The CTS requires that the plant can not be restarted after finding stuck control rods "unless (1) investigation has shown that the cause of the failure is not a failed control rod drive collet housing, and (2) adequate shutdown margin testing has been demonstrated as required by Specification 4.3.A. If investigation shows that the cause of the control rod failure is a cracked collet housing, or if this possibility cannot be ruled out, the reactor shall not be restarted until the affected control rod drive has been replaced or repaired." This requirement has been deleted since it is duplicative of the requirements of ITS LCO 3.0.4.	N/A	3.3.A.2.a
A3	The CTS requires that for stuck control rods a SDM test be performed "to demonstrate under this condition that the core can be made subcritical for any reactivity condition during the remainder of the operating cycle with the analytically determined, highest worth control rod capable of withdrawal, fully withdrawn, and all other control rods capable of insertion, fully inserted." The ITS requires SR 3.1.1.1 to be performed if a rod is withdrawn and can not be inserted (stuck). SR 3.1.1.1 is the proposed SDM test. In the proposed ITS, the definition for SDM requires in part that "all control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM." Therefore the present requirements of the CTS have been incorporated into the definition of SDM.	SR 3.1.1.1, definition of SDM	4.3.A.2.d

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS LCO requirement that control rods be coupled to the drive is presented in ITS SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE.	SR 3.1.3.5	3.3.B.1
A5	The CTS LCO requires that control rods with scram times greater than those permitted in CTS 3.3.C.3 be declared inoperable. The requirement that maximum control rod scram insertion time to notch position 4 be ≤ 7 seconds is presented in ITS SR 3.1.3.4, making it a requirement for control rods to be considered Operable.	SR 3.1.3.4	3.3.A.2.c, 3.3.C.3
A6	The statement in CTS 3.3.B.1 that this requirement does not apply in the refuel condition when the reactor is vented, and that two control rods may be removed as long as Specification 3.3.A.1 is met, has been deleted since it duplicates an identical and more appropriately placed requirement in CTS 3.10.A.5 (ITS 3.10.6).	N/A	3.3.B.1
3.1.4, CONTROL ROD SCRAM TIMES			
A1	Editorial changes, reformatting, and revised numbering.	3.1.4	3/4.3.C, 3.3.E
A2	CTS 4.3.C.1 requires the Rod Worth Minimizer (RWM) to be Operable during scram time testing when below 10% RTP. However, CTS 3.3.B.3 already requires the RWM to be Operable when in Startup or Run MODES and less than 10% RTP. Therefore, this requirement is duplicative of the requirement in ITS 3.3.2.1 and is deleted from ITS 3.1.4.	Table 3.3.2.1-1 Function 2 Applicability	4.3.C.1
A3	In CTS 3.3.C.3, the maximum insertion time is specified in terms of "90% insertion". Scram times are measured from signals generated by switches corresponding to control rod notch positions. The proposed change will specify scram insertion time limits (in ITS Table 3.1.4-1 Note 2) in terms of "notch position" within a specified number of seconds. This terminology is consistent with the other scram time limits specified in CTS 3.3.C.1 and CTS 3.3.C.2.	Table 3.1.4-1 Note 2	3.3.C.3
3.1.5, CONTROL ROD SCRAM ACCUMULATORS			
A1	Editorial changes, reformatting, and revised numbering.	3.1.5	3.3.A.2.d, 4.3.A.2.c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS requirement governing control rod drive (CRD) hydraulic control unit (HCU) accumulators is not associated with an Applicability statement governing when the accumulator and the associated rod must be Operable. However, the Applicability is assumed to be MODES 1 and 2 since the current default actions in CTS 3.3.A.2.e are to be in Hot Shutdown in 12 hours. Therefore, the ITS Applicability is MODES 1 and 2.	3.1.5	3.3.A.2.d
A3	A new Note has been added to the CTS ("Separate Condition entry is allowed for each control rod scram accumulator") to provide more explicit instructions for proper application for the new ACTIONS for Technical Specification compliance. In conjunction with ITS 1.3 - "Completion Times," this Note provides direction consistent with the intent of the existing ACTIONS for inoperable control rod accumulators.	3.1.5 ACTIONS Note	3.3.A.2.d
3.1.6, ROD PATTERN CONTROL			
A1	Editorial changes, reformatting, and revised numbering.	3.1.6	3.3.B.3.e, 3.3.B.3.f
A2	The CTS requires that if the requirements of BPWS can not be met, "the reactor shall not be restarted." This requirement has been deleted since it is duplicative of the requirements of ITS LCO 3.0.4.	N/A	3.3.B.3.f
3.1.7, STANDBY LIQUID CONTROL SYSTEM			
A1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.4
A2	CTS 3.4.C states that the solution temperature including the pump suction piping temperature has to be maintained above the temperature limits; however, CTS 4.4.C.2 only requires the solution temperature to be checked daily. The ITS has two separate surveillances, which require that both the temperature of the sodium pentaborate solution and the pump suction piping be verified every 24 hours. Since the intent of the CTS Surveillance is to check both locations, this change clarifies this intent.	SR 3.1.7.2, SR 3.1.7.3	3.4.C, 4.4.C.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.1.8	3.3.E, 4.3.A.2.b, 4.3.A.2.e, 4.3.C.3
A2	The requirement to fully cycle the scram discharge volume vent and drain valves is covered by two duplicate Surveillances in the CTS. The ITS combines these tests into one surveillance. In addition, since the 92 day surveillance frequency in one of the CTS requirements is consistent with the Inservice Testing Requirements, the ITS Frequency is "In accordance with the Inservice Testing Program".	SR 3.1.8.2	4.3.A.2.e, 4.3.C.3.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)		
A1	Editorial changes, reformatting, and revised numbering.	3.2.1	3/4.5.H
A2	CTS 3.5.H requires the APLHGR be within limits "during power operations." CTS 4.5.H only requires the limit to be checked when thermal power is ≥ 25% RTP. In addition, consistent with these requirements, if APLHGR is not restored to within limits when thermal power is ≥ 25% RTP, the current actions of CTS 3.5.H require power to be reduced to < 25% RTP. Therefore, the ITS Applicability for the APLHGR specification is "THERMAL POWER ≥ 25% RTP".	3.2.1 Applicability	3/4.5.H
A3	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the APLHGR is returned to within the prescribed limits". The phrase "or until the APLHGR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.5.H
	3.2.2, MINIMUM CRITICAL POWER RATIO (MCPR)		
A1	Editorial changes, reformatting, and revised numbering.	3.2.2	3.1.B, 4.1.C, 4.1.D
A2	CTS 3.1.B requires the MCPR be within limits of the COLR "during power operations." CTS 4.1.C only requires the limit to be checked when thermal power is ≥ 25% RTP. In addition, consistent with these requirements, if MCPR is not restored to within limits when thermal power is ≥ 25% RTP, the current actions of CTS 3.1.B require power to be reduced to < 25% RTP. Therefore, the ITS Applicability for the MCPR specification is "THERMAL POWER ≥ 25% RTP".	3.2.2 Applicability	3.1.B, 4.1.C
A3	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the MCPR is returned to within the prescribed limits". The phrase "or until the MCPR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.1.B
	3.2.3, LINEAR HEAT GENERATION RATE (LHGR)		
A1	Editorial changes, reformatting, and revised numbering.	3.2.3	3/4.5.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS requires the reactor power be reduced "to less than 25% of rated power within the next four hours or until the LHGR is returned to within the prescribed limits". The phrase "or until the LHGR is returned to within the prescribed limits" is not included in the ITS, since it is redundant to ITS LCO 3.0.2.	N/A	3.5.I
	3.2.4, APRM GAIN AND SETPOINT		
A1	Editorial changes, reformatting, and revised numbering.	3.2.4	4.1.B
A2	Notes are added that indicate the proper relationship with respect to when the SRs are required. These Notes provide clarification and do not change any technical requirement of the Specification.	SR 3.2.4.1 Note, SR 3.2.4.2 Note	4.1.B
A3	The CTS requires the determination of MFLPD on a daily basis during reactor power operation at ≥ 25% RTP. The APRM high flux scram settings must be adjusted if necessary as specified in the Core Operating Limits Report (COLR). ITS SR 3.2.4.1 will require the verification that MFLPD is within limits (consistent with LCO 3.2.4.a). ITS SR 3.2.4.2 requires the verification that each required APRM Neutron Flux — High (Flow Biased) Allowable Value specified in the COLR is made applicable (i.e., LCO 3.3.1.1, "Reactor Protection System Instrumentation," Function 2.b of Table 3.3.1.1-1 Allowable Value is reduced by the ratio of FRTP to MFLPD) or that each required APRM gain be adjusted as specified in the COLR (i.e., such that the APRM readings are ≥ 100% times MFLPD). This change clarifies the option to adjust the APRM gains instead of lowering the APRM Neutron Flux (Flow Biased) Allowable Value since this adjustment will equally compensate for any local flux peaking when any MFLPD is greater than the FRTP.	SR 3.2.4.1, SR 3.2.4.2	4.1.B

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SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.1.1	2.1.A.1.a, 2.1.A.1.b, 2.1.A.1.c, 2.1.A.2, 2.1.A.3, 2.1.A.4, 2.1.A.5, 2.2.1.A, 3/4.1.A, Tables 3.1-1, 4.1-1, and 4.1-2
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.1.1 ACTIONS Note	Table 3.1-1 Notes 1.a and 1.b
A3	The CTS Trip Level Settings (changed to Allowable Value) for the Mode Switch in Shutdown, Manual Scram, IRM Inoperative and APRM Inoperative Functions have been changed to NA in the ITS, since there are no Allowable Values.	Table 3.3.1.1-1 Allowable Values for Functions 1.b, 2.d, 10, and 11	Table 3.1-1 Trip Functions 1, 2, 4, and 8
A4	One of the optional actions for when an APRM Flow Referenced Neutron Flux channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is Mode 1. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A
A5	One of the optional actions for when an APRM Fixed High Neutron Flux channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is Mode 1. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	Not used.	N/A	N/A
A7	CTS Table 3.1-1 requires the High Reactor Pressure, High Drywell Pressure, and Reactor Low Water Level Functions to be Operable in the Refuel Mode. However, Note 7 to the Table effectively states that these Functions are not required to be Operable when the reactor is subcritical and the reactor water temperature is less than 212 degrees F. In addition, Note 9 states that the High Reactor Pressure is not required in the Refuel Mode when the reactor pressure vessel head is not bolted to the vessel, which is the normal condition during Refueling. Thus, in the ITS these three Functions are not required when in MODE 5.	N/A	Table 3.1-1, including Notes 7 and 9
A8	CTS Table 3.1-1 Note 8 permits the High Drywell Pressure Function to be inoperable when primary containment integrity is not required in the Refuel and Startup Modes. Primary containment integrity in the ITS is always required when in MODE 2. Thus the ITS does not include the MODE 2 portion of this Note. In addition, the requirement for High Drywell Pressure Function in Refuel (MODE 5) has not been included as described in DOC A7 above. Therefore, the ITS does not include the MODE 5 portion of the Note.	N/A	Table 3.1-1 Note 8
A9	One of the optional actions for when a Turbine Control Valve Fast Closure or Turbine Stop Valve Closure channel is inoperable is to insert all Operable rods within 4 hours (i.e., being in MODE 3). The ITS does not include this action since the CTS (and ITS) Applicability for the Function is $\geq$ 29% RTP. Thus entry into Mode 3 is not really required.	N/A	Table 3.1-1 Note 3.A
A10	The CTS states that functional tests and calibrations are not required on the part of the system that is not required to be operable or are tripped. If tests are missed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.1-1 Note 3, Table 4.1-2 Note 2
A11	Not used.	N/A	N/A
A12	The CTS specifies that the instrumentation channel functional test will consist of injecting a simulated electrical signal into the instrument channels for certain channels. This explicit allowance is not retained in the ITS since it is duplicative of the current and proposed CHANNEL FUNCTIONAL TEST definition.	CHANNEL FUNCTIONAL TEST definition	Table 4.1-1 Note 4

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A13	Not used.	N/A	N/A
A14	The CTS specifies that Response Time Testing and conformance to the test acceptance criteria for the remaining channel components includes trip unit and relay logic. This requirement is not explicitly included in the ITS since the definition of RPS RESPONSE TIME and the Response Time SR ensure the proper testing is performed.	RPS RESPONSE TIME definition, SR 3.3.1.1.15	4.1.A footnote *
A15	The explicit requirement to perform a quarterly Functional Test of the High Water Level in Scram Discharge Instrument Volume Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.1-1 Functional Test requirement for Trip Function 14
A16	The CTS specifies that the Trip Level Setting (changed to Allowable Value) of the IRM High Flux Function is ≤ 96% of full scale. In the ITS, the Allowable Value for this Function is ≤ 120/125 divisions of full scale, which is equivalent to 96% of full scale.	Table 3.3.1.1-1 Function 1.a Allowable Value	Table 3.1-1 Trip Function 3 Trip Level Setting
A17	The CTS specifies that a Functional test of the RPS Channel Test switches are required to be performed. However, a clarification is added that this test is to exercise the automatic scram contactors by either the RPS channel test switches or by performing a functional test of any automatic scram function. For clarity, the ITS requires performance of a functional test of the automatic scram contactors (DOC LA9 justifies relocation of methods to perform the functional test).	SR 3.3.1.1.4	Table 4.1-1 Trip Function 3 Functional Test Frequency, including Note 1
A18	The CTS specifies that the APRM Flow Referenced Neutron Flux Scram Trip Setting shall be adjusted during single loop operation when required by Specification 3.5.J (The actual requirement is specified in CTS 3.5.K). This cross reference is not included in the ITS since it is redundant to the requirements in CTS 3.5.K (and maintained in the ITS).	N/A	2.1.A.1.c(1)

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A19	The CTS "Trip Level Setting" and "limiting safety system trip settings" are changed to "Allowable Value" in the ITS, since the CTS trip level settings and limiting safety system trip settings are considered Allowable Values.	Table 3.3.1.1-1 Allowable Values	Table 3.1-1 Trip Level Setting, 2.1.A limiting safety system trip settings
A20	The CTS does not have a specific CHANNEL CALIBRATION requirement for the APRM and IRM RPS Functions. However, the CTS does have a 92 day CHANNEL CALIBRATION requirement for the APRM and IRM Control Rod Block Functions. Therefore, consistent with this CTS requirement and with current practice, a Surveillance Requirement is included as ITS SR 3.3.1.1.9 to perform a CHANNEL CALIBRATION on IRM Functon 1.a and APRM Functions 2.a, 2.b, and 2.c every 92 days.	SR 3.3.1.1.9	Table 4.2-3 Instrument Calibration Test for Functions 1, 2, 3, and 4
3.3.1.2, SRM INSTRUMENTATION			
A1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.3.B.4, 3/4.10.B
A2	The CTS requirement for SRM response of 3 cps is based on a signal to noise ratio of $\geq$ 2:1. For clarity, the signal to noise ratio is specified in the ITS.	SR 3.3.1.2.4	4.3.B.4
A3	The CTS does not have a specific CHANNEL CALIBRATION requirement for the SRM indication. However, the CTS does have a 92 day CHANNEL CALIBRATION for the MODE 2 SRM Control Rod Block Function. Therefore, consistent with this CTS requirement and with current practice, a Surveillance Requirement is included as ITS SR 3.3.1.2.7 to perform a CHANNEL CALIBRATION every 92 days.	SR 3.3.1.2.7	Table 4.2-3 Instrument Calibration Test for Function 8

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	2.1.A.1.d, 3/4.2.C, Tables 3.2-3 and 4.2-3, 3/4.3.B.3, 3/4.3.B.5
A2	The requirements of the Rod Worth Minimizer (RWM) have been moved from a separate Specification in the CTS to the ITS Control Rod Block Specification.	3.3.2.1	3/4.3.B.3
A3	Not used.	N/A	N/A
A4	The explicit requirement to perform a quarterly Functional Test of the RBM - Upscale and RBM - Downscale Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST. In addition, the CTS Note that is associated with the channel functional test (This instrument is exempt...) is deleted from the CTS since the CHANNEL FUNCTIONAL TEST is not required to be performed.	CHANNEL CALIBRATION definition	Table 4.2-3 Instrument Functional Test requirement for Functions 6 and 7, including Note 5
A5	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-3 Note 4
A6	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the RETS appropriately discuss the requirements.	N/A	3/4.D

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	ITS SR 3.3.2.1.8 adds an explicit requirement for a CHANNEL CALIBRATION of the recirculation loop flow signal portion of the RBM Upscale Function (which is flow biased). The flow signal provided to the RBM Upscale Function is the same signal provided to the APRM Newton Flux - High (Flow Bias) Function. A Note is added to ITS SR 3.3.2.1.5 and SR 3.3.2.1.8 to explain which SR performs the flow signal calibration.	SR 3.3.2.1.5, SR 3.3.2.1.8	Table 4.2-3
	3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.2.F, Tables 3.2-6 and 4.2-6
A2	The CTS provides the option of either restoring the inoperable instrument channel to operable status or placing the inoperable channel in the tripped condition when one of the required feedwater pump turbine and main turbine trip instruments is inoperable. The ITS does not include the option to restore the inoperable channel to Operable status, since the option of restoring inoperable instruments to an operable status is always permitted in the Technical Specifications.	N/A	Table 3.2-6 Note 1a
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.2.2 ACTION Note	Table 3.2-6 Note 1
A4	The CTS provides an explicit allowance to inject a simulated electrical signal into the measurement channel as close to the sensor as practicable to satisfy the requirements of the Instrument Channel Functional Test. This explicit allowance is not retained in the ITS since it is duplicative of the current Instrument Channel Functional Test definition in the CTS and the ITS CHANNEL FUNCTIONAL TEST definition.	CHANNEL FUNCTIONAL TEST definition	Table 4.2-6 Note 2
A5	The CTS specifies that the limiting condition for operation for the instrumentation that provide a feedwater pump trip and main turbine trip are given in Table 3.2-6 and requires the feedwater pump turbine and main turbine trip instrumentation to be calibrated in accordance with CTS Table 4.2-6. This cross-reference to the Tables has been deleted since the ITS does not include a Table. All of the technical requirements of the CTS Tables are included in the ITS LCO and Surveillances.	3.3.2.2	3/4.2.F

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.2.2.3	Table 3.2-6 Trip Level Setting
	3.3.3.1, PAM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.3.1	3/4.2.H, Tables 3.2-8 and 4.2-8
A2	The ITS Applicability is specifically stated as MODES 1 and 2, consistent with the CTS applicability of Run and Startup/Hot Standby modes.	3.3.3.1 Applicability	Table 3.2-6 Note J
A3	The requirement that the Containment High Range Radiation Monitor Function provides an automatic isolation of the containment vent and purge valves is being moved to ITS 3.3.6.1, Primary Containment Isolation Instrumentation.	3.3.6.1	Table 3.2-8 footnote *
A4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.1 ACTIONS Note 2	Table 3.2-8 Notes A and F
A5	The ITS includes an ACTION that directs entry into the appropriate Conditions referenced in ITS Table 3.3.3.1-1 when two channels in the same Function are inoperable and the Completion Time for restoration of one required channel has expired. The ACTION has been added since not all Functions have the same ACTIONS when the required channels are not restored.	3.3.3.1 ACTION D	N/A
A6	The CTS Table Instrument Functional Test is not applicable to any of the PAM instrumentation retained in the ITS (as indicated by "N/A" in the CTS). Therefore, the Instrument Functional Test requirement is not included in the ITS.	N/A	Table 4.2-8

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.3.2, REMOTE SHUTDOWN SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.3.3.2	3/4.2.J, Table 3.2-10
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.2 ACTIONS Note 2	3.2.J.2, 3.2.J.3
A3	Not used.	N/A	N/A
A4	The CTS requires a channel check on all the required instrument channels (not control switches). The ITS requires a CHANNEL CHECK for each required instrument channel that is normally energized, since no specific acceptance criteria would apply to the CHANNEL CHECK if an instrument channel were de-energized (since the instruments would not be indicating). However, this change does not modify any current requirements since all the existing channels are either energized or are a directly reading parameter.	SR 3.3.3.2.1	Table 3.2-10
	3.3.4.1, ATWS-RPT INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.2.G, Tables 3.2-7 and 4.2-7
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.1 ACTIONS Note	Table 3.2-7 Note 1
A3	Not used.	N/A	N/A
A4	Not used.	N/A	N/A
A5	Not used.	N/A	N/A

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	CTS Table 3.2-7 Footnote ** provides guidance in applying the Required Actions of CTS Table 3.2-7 Note 1.b. This Footnote is not retained in the ITS.	N/A	Table 3.2-7 Footnote **
A7	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.4.1.4	Table 3.2-7 Trip Level Setting
A8	The CTS specifies that the limiting condition for operation for the instrumentation that provide a recirculation pump trip are given in Table 3.2-7 and requires the recirculation pump trip instrumentation to be functionally tested, calibrated, and logic tested in accordance with CTS Table 4.2-7. This cross-reference to the Tables has been deleted since the ITS does not include a Table. All of the technical requirements of the CTS Tables are included in the ITS LCO and Surveillances.	3.3.4.1	3/4.2.G
A9	Not Used	N/A	N/A
	3.3.5.1, ECCS INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.2.B, Tables 3.2-2 and 4.2-2, 4.5.A.1.f, 4.5.A.3
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.1 ACTIONS Note	Table 3.2-2 Notes 1 through 9
A3	The ITS includes an ACTION that directs entry into the appropriate Conditions referenced in ITS Table 3.3.5.1-1 when one or more channels are inoperable. The ACTION has been added since not all Functions have the same ACTIONS.	3.3.5.1 ACTION A	N/A

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the RETS appropriately discuss the requirements.	N/A	3/4.2.D
A5	The CTS includes a note that states "This instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel." This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.2-2 Note 5
A6	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-2 Note 4
A7	The column title "Total Number of Instrumentation Channels Provided by Design for Both Trip Systems" is proposed to be changed to a per Function basis in the ITS rather than the current per Trip System basis. Therefore, except as otherwise noted, the number of channels in the proposed column will be changed to identify the number of channels associated with the new ITS Function.	Table 3.3.5.1-1	Table 3.2-2
A8	The details in the CTS Table 3.2-2 "Total Number of Instrumentation Channels Provided by Design for Both Trip Systems" column identifying which systems are supported by the CTS Trip Functions have been deleted (e.g., Core Spray and RHR). ITS Table 3.3.5.1-1 is arranged to identify each Function providing support to a specific ECCS System. Therefore, all the Trip Functions in CTS Table 3.2-2 providing a support Function to the Core Spray System, Low Pressure Injection System (LPCI), High Pressure Coolant Injection (HPCI) System and the Automatic Depressurization System (ADS) Trip System A and B are now associated with the specific System in ITS Table 3.3.5.1-1, thus it is not necessary to identify this cross reference to each system.	Table 3.3.5.1-1	Table 3.2-2
A9	CTS Table 3.2-2 Item 12 identifies specific start timer setpoints for the "1st Pump" and "2nd Pump" for RHR (LPCI) Loops A and B. In ITS Table 3.3.5.1-1 Function 2.f, the specific LPCI pumps (e.g., A, D) are identified and are associated along with the appropriate Allowable Values.	Table 3.3.5.1-1 Function 2.f	Table 3.2-2 Item No. 12

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A10	CTS 3.2.B requires the Core and Containment Cooling System instrumentation to be Operable whenever the system(s) it initiates or controls are required to be operable as specified in CTS 3.5. In the ITS, the Applicability is specifically stated in the ECCS Instrumentation Table, in lieu of referencing the ECCS System Specification. The ITS Applicability is consistent with the CTS system Applicability, except as modified by the DOCs in ITS 3.5.1 and ITS 3.5.2.	Table 3.3.5.1-1	3.2.B
A11	A Note has been included in the ITS to clarify that the action is only applicable to ITS 3.3.5.1 Functions 3.a and 3.b, consistent with the intent of the CTS action.	3.3.5.1 Required Action B.2 Note	Table 3.2-2 Note 1.A
A12	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.5.1-1 Allowable Value	Table 3.2-2 Trip Level Setting
A13	The explicit requirement to perform a quarterly Functional Test of the Drywell Pressure (non-ATTS), ADS - LPCI and CS Pump Discharge, and HPCI Suction Source Level Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-2 Functional Test requirement for Instrument Channels 2a), 5, and 6
A14	The CTS divides the Surveillance Requirements for Drywell Pressure and Reactor Pressure Functions as non-Analog Transmitter Trip System (ATTS) components and ATTS components. The ITS does not specify this explicitly in the ITS Table as each of the Functions are listed separately along with the associated Surveillance Requirements.	Table 3.3.5.1-1 Functions 1.b, 2.b, 2.h, and 3.b	Table 4.2-2 Instrument Channels 2a) and 2b)
A15	The CTS requirement that a calibration of the timers is included in the LSFT has been deleted, since it is duplicative of the CTS requirement (and maintained in the ITS) to perform a Channel Calibration of the timers.	N/A	Table 4.2-2 Note 9

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A16	The CTS specifies that the Condensate Storage Tank Low Level setting must be ≥ 59.5 inches above the tank bottom. The ITS does not specify the reference point since it is implied by the associated name of the Function (Condensate Storage Tank Level). In addition, the CTS specifies that the Suppression Pool High Level setting must be ≤ 6 inches above normal level, with the normal Suppression Pool Water Level, as specified in CTS 3.7.A.1, being from 13.88 to 14.00 feet. The ITS is clarified to specifically state the Allowable Value as ≤ 14.5 feet, consistent with the CTS.	Table 3.3.5.1-1 Functions 3.d and 3.e	Table 3.2-2 Item No. 17 and 18
	3.3.5.2, RCIC SYSTEM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.2.B, Tables 3.2-2 and 4.2-2, 4.5.E.1.f
A2	CTS 3.2.B requires the RCIC System instrumentation to be Operable whenever the RCIC System is required to be operable as specified in CTS 3.5. In the ITS, the Applicability is specifically stated as MODES 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, in lieu of referencing the RCIC System Specification. The ITS Applicability is consistent with the CTS system Applicability.	3.3.5.2	3.2.B
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.2 ACTIONS Note	Table 3.2-2 Notes 1, 4, and 9
A4	The ITS includes an ACTION that directs entry into the appropriate Conditions referenced in ITS Table 3.3.5.1-1 when one or more channels are inoperable. The ACTION has been added since not all Functions have the same ACTIONS.	3.3.5.2 ACTION A	N/A
A5	The CTS states that instrument checks (i.e., channel checks) are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.2-2 Note 4

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The CTS includes a note that states "This instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel." This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.2-2 Note 5
A7	The explicit requirement to perform a quarterly Functional Test of the RCIC Suction Source Level Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-2 Functional Test requirement for Instrument Channel 6
A8	The CTS provides a cross reference to the Radiological Effluent Technical Specification (Appendix B) for those Radiation Monitoring Systems which provide an Isolation and Initiation Function. This cross reference has been deleted since the RETS appropriately discuss the requirements.	N/A	3/4.2.D
A9	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.5.2-1 Allowable Value	Table 3.2-2 Trip Level Setting
A10	The CTS specifies that the Condensate Storage Tank Low Level setting must be $\geq$ 59.5 inches above the tank bottom. The ITS does not specify the reference point since it is implied by the associated name of the Function (Condensate Storage Tank Level).	Table 3.3.5.2-1 Function 3	Table 3.2-2 Item No. 16

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	1.2.2, 2.1.A.8, 2.2.2, 3/4.2.A, Tables 3.2-1, 3.2-2, 3.2-8, 4.1-1, 4.1-2, 4.2-1, 4.2-2, and 4.2-8
A2	The CTS specifies that Response Time Testing and conformance to the test acceptance criteria for the remaining channel components includes trip unit and relay logic. This requirement is not explicitly included in the ITS since the definition of RPS RESPONSE TIME and the Response Time SR ensure the proper testing is performed.	ISOLATION INSTRUMENTATION RESPONSE TIME definition, SR 3.3.6.1.8	4.2.A note *
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.6.1 ACTIONS Note 2	Table 3.2-1 Notes 1, 2, and 3, Table 3.2-8 Note A.
A4	The CTS provides the option of either restoring the inoperable instrument channel to operable status or placing the inoperable channel in the tripped condition when there are two required instruments of a Trip Function inoperable. The ITS does not include the option to restore the inoperable channel to Operable status, since the option of restoring inoperable instruments to an operable status is always permitted in the Technical Specifications.	N/A	Table 3.2-1 Note 1.b.3)
A5	The CTS Note that allows 6 hours to perform a surveillance for those functions utilizing a two-out-of-two taken once logic has been clarified in the ITS by identifying the actual Functions involved (e.g., ITS table 3.3.6.1 Functions 2.d and 2.g).	3.3.6.1 SR Note 2	Table 3.2-1 Note 2.a

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The requirement in the CTS to declare the affected system inoperable when the penetration is isolated is an unnecessary reminder that other Technical Specifications may be affected. This is essentially a "cross reference" between Technical Specifications and has not been included in the ITS.	N/A	Table 3.2-1 Note 3.F
A7	The Reactor Water Cleanup (RWC) System, High Pressure Coolant Injection (HPCI) Steam Line, and Reactor Core Isolation Cooling System (RCIC) Steam Line Area Temperature Functions specified in CTS Table 3.2-1 have been separated to indicate the actual areas in which the channels are designed to monitor.	Table 3.3.6.1-1 Functions 3.d, 3.e, 3.f, 3.g, 3.h, 3.i, 4.d, 4.e, 4.f, 5.a, 5.b, and 5.c)	Table 3.2-1 Trip Functions 11, 16, and 20
A8	The explicit requirement to perform a quarterly Functional Test of the SDC Reactor High Pressure, RWCU Area High Temperature, Main Steam Line High Radiation, and HPCI/RCIC High Exhaust Diaphragm Pressure Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-1 Functional Test for Instrument Channels 1, 6, 8, and 12
A9	The CTS states that instrument checks, instrument functional tests, and calibration tests are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.1-1 Note 3, Table 4.1-2 Note 2,Table 4.2-1 Note 4
A10	The CTS includes notes that state that this instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel. This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.1-1 Note 4, Table 4.2-1 Note 5
A11	The CTS requirement that a calibration of the timers is included in the LSFT has been deleted, since none of the Primary Containment Isolation logic includes any time delay relays or timers.	N/A	Table 4.2-1 Note 9

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A12	The CTS Table 4.2-1 Note 8 cross reference to Table 4.1-2 is deleted since the Logic System Functional Testing requirements of the Reactor Low Water Level (Level 3) and Drywell Pressure — High Functions are directly included in ITS 3.3.6.1.	SR 3.3.6.1.8	Table 4.2-1 Note 8
A13	Not used.	N/A	N/A
A14	Not used.	N/A	N/A
A15	The CTS identifies actions based on whether the inoperable channels are common to RPS or not common to RPS. The Actions have been clarified in the ITS by identifying the actual Functions involved.	3.3.6.1 ACTION A	Table 3.2-1 Notes 1.a.1), 1.a.2), 1.b.3)(a), and 1.b.3)(b)
A16	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.6.1 Allowable Value	Table 3.2-1 Trip Level Setting
A17	The CTS requires 2 Main Steam Line High Flow channels to be Operable per trip system. The title of the Function is "Main Steam Line High Flow." This term represents the flow in each of the four steam lines. Therefore, the current requirement is interpreted to be 2 channels per main steam line (MSL), per trip system, for a total of 16 channels. For clarity, in the ITS Table, the Function will require 2 channels per MSL.	Table 3.3.6.1-1 Function 1.c	Table 3.2-1 Trip Function 9
3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION			
A1	Editorial changes, reformatting, and revised numbering.	3.3.6.2	3/4.2.A, Tables 3.2-1, 4.1-1, 4.1-2, 4.2-1, RETS 3/4.8, RETS Tables 3.10-1 and 3.10-2

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.6.2 ACTIONS Note	Table 3.2-1 Notes 1, 2, and 3, RETS Table 3.10-1 Notes a and d
A3	The CTS identifies actions based on whether the inoperable channels are common to RPS. The Actions have been clarified in the ITS by identifying the actual Functions involved.	3.3.6.2 ACTION A	Table 3.2-1 Notes 1.a.1) and 1.b.3)(a)
A4	The CTS provides the option of either restoring the inoperable instrument channel to operable status or placing the inoperable channel in the tripped condition when there are two required instruments of a Trip Function inoperable. The ITS does not include the option to restore the inoperable channel to Operable status, since the option of restoring inoperable instruments to an operable status is always permitted in the Technical Specifications.	N/A	Table 3.2-1 Note 1.b.3)
A5	The CTS states that instrument checks, instrument functional tests, and calibration tests are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	Table 4.1-1 Note 3, Table 4.1-2 Note 2, RETS Table 3.10-2 Note a
A6	The CTS includes notes that state that this instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the instrument channel. This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	Table 4.1-1 Note 4, RETS Table 3.10-2 Note i
A7	The CTS requirement that a calibration of the timers is included in the LSFT has been deleted, since none of the Secondary Containment Isolation logic includes any time delay relays or timers.	N/A	Table 4.2-1 Note 9

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	The explicit requirement to perform a quarterly Functional Test of the Refuel Area Exhaust and Reactor Building Area Exhaust Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	RETS Table 3.10-2 instrument channel functional test for instrument channels 2 and 3
A9	The CTS Note requirement that "there shall be two operable or tripped trip systems for each Trip Function, except as provided below" has been deleted since the other CTS Notes provide sufficient guidance to take when channels are inoperable. In the ITS, the requirements in ITS Table 3.3.6.2-1 and the ACTIONS clearly define the appropriate requirements when channels are inoperable in the ITS.	N/A	Table 3.2-1 Note 1
A10	The RETS requires the Standby Gas Treatment (SGT) System actuation instrumentation to be Operable to support the SGT System and the CTS requires the SGT System to be Operable whenever secondary containment integrity is required. In the ITS, the reference to the SGT System Specification is not used; the actual MODES and other specified conditions are specified, consistent with the Applicability in the ITS SGT System Specification.	Table 3.3.6.2-1 Functions 3 and 4 Applicability	RETS Table 3.10-1

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A11	CTS RETS Table 3.10-1 Note (c) requires to stop handling the refueling equipment or Note (d) requires the isolation of the Secondary Containment and to start the Standby Gas Treatment (SGT) System when the requirements for the Refuel Area Exhaust Monitor are not met. The option to only stop handling the refueling equipment is not retained in the ITS since it does not provide adequate protection during all MODES of plant operation. If operating in MODE 1, stopping this operation (stop handling the refueling equipment) will not provide sufficient protection for all postulated events during power operation. The requirement that this equipment must be Operable during handling the refueling equipment is retained in the Applicability of ITS 3.3.6.2-1, Footnote b, consistent with the current Applicability requirements in CTS RETS 3.8 (see A10). ITS Table 3.3.6.2-1 requires this Function to be Operable during MODES 1, 2 and 3 and Footnote b requires this Function to be Operable during CORE ALTERATIONS and during movement of irradiated fuel assemblies in secondary containment. Therefore, the proposed Applicability will ensure the equipment is Operable during the conditions of postulated events. In addition, the ITS 3.3.6.2 ACTIONS will provide adequate compensatory actions when this instrumentation is inoperable. Changes to the actions in CTS RETS Table 3.10-1 Note (d) are discussed in M3 and L4, therefore, this change is considered administrative.	N/A	RETS Table 3.10-1 Note c
A12	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	Table 3.3.6.2-1 Allowable Value	Table 3.2-1 Trip Level Setting
A13	The RETS details identifying how the Logic System Functional Test is to be performed (i.e., where possible using test jacks) has been deleted since it is duplicative of the ITS definition for Logic System Functional Test.	LOGIC SYSTEM FUNCTIONAL TEST definition	RETS Table 3.10-2 Note f

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.7.1, CREVAS SYSTEM INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.7.1	3.11.A.1, 3.11.A.2, 4.11.A.3, RETS 3.10, RETS Tables 3.10-1 and 3.10-2
A2	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.7.1.2	RETS Table 3.10-1
A3	Not used.	N/A	N/A
A4	The explicit requirement to perform a quarterly Functional Test of the CREVAS Air Inlet Radiation High Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	RETS Table 3.10-2 instrument channel functional test for instrument channel 7
A5	The CTS states that instrument checks, instrument functional tests, and calibration tests are not required when the instruments are not required to be operable or are tripped. This explicit requirement is not retained in the ITS since these allowances are already included in CTS 4.0.A (and retained in ITS SR 3.0.1).	SR 3.0.1	RETS Table 3.10-2 Note a
A6	The CTS includes notes that state that this instrumentation is exempt from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel. This definition is covered by the ITS CHANNEL FUNCTIONAL TEST and does not need to be specified in this Specification.	CHANNEL FUNCTIONAL TEST definition	RETS Table 3.10-2 Note i

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A7	The RETS provides a conversion factor to convert the Main Control Room Ventilation Monitor reading of counts per minute (cpm) to microcuries per centimeter cubed (μCi/cc). This conversion factor is not retained in ITS since the Allowable Value units is maintained in cpm.	N/A	RETS Table 3.10-1 Note i
A8	The RETS specifies that the limiting condition for operation for the instrumentation that provide a CREVAS System trip are given in RETS Table 3.10-1 and requires the CREVAS System trip instrumentation to be surveilled in accordance with RETS Table 3.10-2. This cross-reference to the Tables has been deleted since the ITS does not include a Table. All of the technical requirements of the RETS Tables are included in the ITS LCO and Surveillances.	LCO 3.3.7.1	RETS 3.10
	3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.7.2	Tables 3.2-1 and 4.2-1, RETS 3.9, RETS Tables 3.10-1 and 3.10-2
A2	The requirement in CTS RETS 3.9.b to isolate the vacuum pump (or air removal pump) when the limits of CTS RETS Table 3.10-1 have been exceeded has been deleted since the associated actions for the Main Steam Line Radiation — High Function in CTS RETS Table 3.10-1 Note (h) along with its reference to CTS Appendix A Table 3.2-1 provide the appropriate actions.	N/A	RETS 3.9.b
A3	The Table presentation of the LCO requirements has been changed such that the ITS does not use Tables; the ITS LCO statement includes the CTS LCO requirements from the Tables.	LCO 3.3.7.2	Table 3.2-1, RETS Table 3.10-1
A4	The RETS cross-reference to the Actions in Table 3.2-1 has been deleted, since the actions for the air removal pump are all in one ITS Specification.	N/A	RETS Table 3.10-1 Note h

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A5	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.7.2 ACTIONS Note	CTS Table 3.2-1 Notes 1 and 3.E, RETS Table 3.10-1 Note h
A6	The CTS reference to those trip functions which are not common to RPS has been deleted since the Main Steam Line Radiation — High Function is not common to RPS.	N/A	Table 3.2-1 Notes 1.a.2 and 1.b.3.b)
A7	The CTS term PCIS initiation capability has been changed to condenser air removal pump isolation capability in the ITS since this Specification is concerning the condenser air removal pump isolation.	Surveillance Requirements Note	Table 3.2-1 Note 2.b
A8	The explicit requirement to perform a quarterly Functional Test of the Main Steam Line Radiation - High Function is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-1 instrument functional test for instrument channel 8
A9	The RETS cross-reference to the Surveillances in Table 4.2-1 has been deleted, since the Surveillances for the air removal pump are all in one ITS Specification.	N/A	RETS Table 3.10-2 Note g
A10	The RETS requirement that a calibration of the timers is included in the LSFT has been deleted, since the Main Steam Line Radiation - High Function does not include any time delay relays or timers.	N/A	RETS Table 3.10-2 Note h
A11	The CTS Note requirement that "there shall be two operable or tripped trip systems for each Trip Function, except as provided below" has been deleted since the ITS requirements in the ITS LCO and the ACTIONS clearly define the appropriate requirements when channels are inoperable in the ITS.	N/A	Table 3.2-1 Note 1

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
A12	The ITS includes a Note to preclude placing the channel in trip if the associated isolation valve is inoperable. This clarification has been made since there is no system specification for the condenser air removal pump isolation valves and therefore the appropriate ACTIONS associated with valve inoperabilities are included in this Specification.	3.3.7.2 Required Action A.2 Note	N/A
A13	The RETS cross-reference to the Surveillances in RETS Table 3.10-2 has been deleted, since the Surveillances for the air removal pump are all in one ITS Specification.	N/A	RETS 3.9
A14	The CTS "Trip Level Setting" is changed to "Allowable Value" in the ITS, since the CTS trip level settings are considered Allowable Values.	SR 3.3.7.2.2	Table 3.2-1 Trip Level Setting
A15	The ITS is clarified by a Note that excludes the calibration of the radiation detectors associated with the Main Steam Line Radiation — High Function during the quarterly test (once every 3 months). This is consistent with the CTS, since the current requirements only require an instrument channel alignment (CHANNEL CALIBRATION) every 3 months using a current source, which implies the radiation detector is excluded from this Surveillance.	SR 3.3.7.2.2 Note	Table 4.2-1 Note 11
3.3.7.3, ESW SYSTEM INSTRUMENTATION			
A1	Editorial changes, reformatting, and revised numbering.	3.3.7.3	3/4.11.D
A2	The CTS includes both instrumentation and the system components of the ESW System in one Specification. The ITS splits the requirements into two Specifications, one for the instrumentation and one for the system. Therefore, a specific ITS LCO statement has been provided for the instrumentation.	LCO 3.3.7.3	3/4.11.D
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.7.3 ACTIONS Note	3.11.D

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.8.1, LOP INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3.2.I, Tables 3.2-2 and 4.2-2
A2	Not used.	N/A	N/A
A3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.8.1 ACTIONS Note	Table 3.2-2 Note 10
A4	The CTS requires a "Minimum No. of Operable Instrument Channels Per Trip System." The ITS clarifies this by using the term "Required Channels Per Bus." This specifies the number of channels required to be Operable to ensure an EDG subsystem or EDG will start when required. In addition, the CTS Table column "Total Number of Instrument Channels Provided by Design for Both Trip Systems" has been deleted since only one trip system exists for each emergency bus.	Table 3.3.8.1-1	Table 3.2-2
A5	The ITS includes a Note to clarify which SRs are required to be performed on each of the LOP instrument Functions.	Surveillance Requirements Note 1	Table 4.2-2
A6	The explicit requirement to perform a quarterly Functional Test of the 4 kV Emergency Bus Under Voltage Functions is not included in the ITS, since the CTS (and ITS) require a CHANNEL CALIBRATION at the same Frequency, and the ITS definition of CHANNEL CALIBRATION requires a CHANNEL FUNCTIONAL TEST.	CHANNEL CALIBRATION definition	Table 4.2-2 instrument functional test requirement for instrument channel 7

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.8.2, RPS ELECTRIC POWER MONITORING		
A1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.9.G
A2	The CTS provides the option of either restoring the inoperable monitoring assembly to Operable status or removing the associated RPS power supply from service when an assembly is inoperable. The ITS does not include the option to restore the inoperable assembly to Operable status, since the option of restoring the inoperable assembly to an operable status is always permitted in the Technical Specifications.	N/A	3.9.G.1, 3.9.G.2
A3	The CTS "setpoints" is changed to "Allowable Value" in the ITS, since the CTS setpoints are considered Allowable Values.	SR 3.3.8.2.2, SR 3.3.8.2.3	4.9.G.2

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, RECIRCULATION LOOPS OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.4.1	3.5.J, 3.5.K
A2	Although not stated in the CTS, Thermal Hydraulic Stability applies for both two loop and single loop operation. This clarification is reflected in the ITS LCO, which requires operations to be outside the "Exclusion Region" of the power-to-flow map in both two loop and one loop operation, and in the associated Action.	LCO 3.4.1, 3.4.1 ACTION A	3.5.J.1.a
A3	The CTS 3.5.K.1 cross-reference to CTS 1.1.A has been deleted since the proposed Safety Limit is applicable at all times. As currently written, the safety limit would not be required to be met for up to 8 hours after a single loop is in service. This is not the intent and would not be utilized in this manner. In addition, the CTS 3.5.K.1 cross-reference to the APRM Flow Referenced Neutron Flux control rod block in CTS 2.1.A and in 3.2.C have been deleted since the function has been relocated from the Technical Specifications (see DOCs for LCO 3.3.2.1).	N/A	3.5.K.1
	3.4.2, JET PUMPS		
A1	Editorial changes, reformatting, and revised numbering.	3.4.2	3/4.6.G
A2	The wording in the CTS was changed to require verification that one of the criteria be met, rather than require verification that none of the conditions exist simultaneously.	SR 3.4.2.1	4.6.G, 4.6.G.A.b
A3	The CTS places requirements on individual jet pump differential pressure variation from the average of all jet pump differential pressures. The ITS places requirements on individual jet pump differential pressure variation from established patterns. This change is consistent with the recommendations provided in General Electric Service Information Letter (SIL) No. 330, Jet Pump Beam Cracks," and NUREG/CR-3052, "Closeout of IE Bulletin 80-07: BWR Jet Pump Assembly Failure." Since the jet pump diffuser to lower plenum differential pressure or relationship of one jet pump to the loop average is repeatable, both methods of comparison are considered equivalent.	SR 3.4.2.1	4.6.G.3

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.3, SAFETY/RELIEF VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.6.E, 2.2.1.B
A2	The CTS Applicability is "during reactor power operating conditions and prior to startup from a cold condition, or whenever reactor coolant pressure is greater than atmosphere and temperature greater than 212°F." The CTS Applicability of "during reactor power operating conditions," and "whenever reactor coolant pressure is greater than atmosphere and temperature greater than 212°F," are encompassed by the ITS MODES of Applicability (MODES 1, 2, and 3). The CTS Applicability, "prior to startup from a cold condition," is consistent with CTS 3.0.D and ITS LCO 3.0.4, which require that an LCO be met prior to entry into the MODE or other specified condition in the Applicability, and therefore are not required to be specified in ITS 3.4.3.	3.4.3 Applicability	3.6.E.1
A3	CTS 3.6.E.1 specifies that the Automatic Depressurization System (ADS) valves shall be OPERABLE as required by CTS 3.5.D. This statement is a cross-reference that another Specification is also Applicable, and is not necessary to be in the ITS.	N/A	3.6.E.1
A4	The CTS is revised to reflect that only each "required" S/RV need be manually opened, since the CTS states that only 9 of 11 S/RVs are required to be OPERABLE.	SR 3.4.3.2	4.6.E.4
A5	Not used.	N/A	N/A
	3.4.4, RCS OPERATIONAL LEAKAGE		
A1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.6.D
A2	The requirement to record the reactor coolant leakage rate is not included in the ITS, since this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records).	N/A	4.6.D.1

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION		
A1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.2.E, 3/4.6.D.4
A2	The CTS specifies that the limiting conditions for operation for the instrumentation that monitors drywell leak detection are given in CTS Table 3.2-5. The ITS LCO explicitly specifies the RCS leakage detection instrumentation required to be Operable (i.e., Drywell Drain Sump Monitoring System, one channel of the drywell continuous atmospheric particulate system, and one channel of the drywell continuous atmospheric gaseous system, a Table is not used in the ITS. Therefore, this change deletes a cross reference to a Table which is not included in the ITS. Similarly, reference to CTS Table 4.2-5 has been deleted since in the ITS, a specific table is not used.	3.4.5	3.2.E, 4.2.E
A3	CTS Table 3.2-5 Note 2, which refers to another Specification (CTS 3.6.D) for the associated Action requirements, does not need not be repeated in the ITS since the associated actions of this Specification have been incorporated in ITS 3.4.5.	N/A	Table 3.2-5 Note 2
A4	CTS Table 4.2-5 Note 4, states that instrument checks are not required when these instruments are not required to be operable or are tripped. This Note is not included in the ITS because the Surveillances to which the Note applies have been deleted and also because there is no trip position for this instrumentation.	N/A	Table 4.2-5 Note 4
A5	The Instrument Functional Test Frequency of the Floor Drain Sump Flow Integrator identified in Note 1 to Table 4.2-5 has been simplified to once every 31 days. The allowance to be able to change the surveillance frequency by submitting failure rate data to the NRC is always an option and is not necessary for inclusion in the ITS.	SR 3.4.5.2	Table 4.2-5 Note 1
	3.4.6, RCS SPECIFIC ACTIVITY		
A1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.6.C
A2	The requirement in CTS 4.6.1.b to perform an isotopic analysis of a sample of reactor coolant has been reworded to match the current wording in CTS 3.6.C.1. ITS SR 3.4.6.1 will require the verification that the reactor coolant DOSE EQUIVALENT I-131 specific activity is $\leq$ 0.2 μCi/gm.	SR 3.4.6.1	4.6.C.1.b

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SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN			
NONE	NONE	NONE	NONE
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN			
NONE	NONE	NONE	NONE
3.4.9, RCS P/T LIMITS			
A1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.6.A
A2	The CTS does not state any Applicability requirements. However, the limitations imposed by the CTS apply at all times, therefore, it can be implied that the Specification is also Applicable "At all times," as stated in the ITS Applicability.	3.4.9 Applicability	3/4.6.A
A3	CTS 3.6.A.5.a is clarified by adding a NOTE that requires a determination be made whether the RCS is acceptable for continued operation whenever the P/T limit is not met, regardless of whether compliance with the LCO is restored. This change only provides clarification, because CTS 3.6.A.5.a effectively contains this requirement.	3.4.9 Condition A Note	3.6.A.5.a
A4	The CTS provides actions appropriate for placing the facility in a condition outside the MODE(S) of Applicability when the Applicability is MODES 1, 2, and 3. Since certain PT limits apply even when not in MODES 1, 2, and 3, a new ITS Action was added, as described in DOC M4. Due to this addition, to clarify the use and application of applying the appropriate action depending on the MODE of operation, the specific clarification "in MODES 1, 2, or 3" is added.	3.4.9 Condition A	3.6.A.5
A5	Not used.	N/A	N/A

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SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The requirement to record the various P/T limit temperatures and pressures is not included in the ITS, since this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records).	N/A	4.6.A.1, 4.6.A.2, 4.6.A.3, 4.6.A.4, 4.6.A.6
A7	Thermal stresses on vessel components are dependent upon the temperature difference between the idle loop coolant and the RPV coolant. ITS SR 3.4.9.5 ensures the temperature difference between the idle loop and the RPV coolant is acceptable. The CTS requirements to monitor the temperature difference between an idle loop and an operating loop are unnecessary and are deleted since they are redundant to the loop-to-coolant requirement of ITS SR 3.4.9.5. However, in accordance with procedures and as discussed in the Bases for ITS SR 3.4.9.4, the loop-to-coolant temperature check may use the operating loop temperature as representative of "coolant temperature".	N/A	3/4.6.A.6.c
A8	The Frequency of the CTS requirements to verify the reactor vessel head flange and flange temperatures are within limits is either every 12 hours or 30 minutes when the reactor vessel head flange falls below a prescribed limit. Therefore, the first required Surveillance is 12 hours or 30 minutes after the specified temperature is reached. In the ITS a Note has been added to clarify that the Surveillances are not required to be performed until 30 minutes after RCS temperature ≤ 100°F or 120°F, respectively, consistent with the CTS requirements.	SR 3.4.9.7 Note, SR 3.4.9.8 Note	4.6.A.1.a, 4.6.A.1.b
A9	Not used.	N/A	N/A
CTS 3/4.6.F, STRUCTURAL INTEGRITY			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS - OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.5.1	3/4.5.A, 3/4.5.C, 3/4.5.D, 3/4.5.G, 4.6.E.3, 4.6.E.4, Table 4.2-2, 3/4.9.F
A2	Existing specifications governing Operability and Surveillance Testing of Core Spray, Low Pressure Coolant Injection, High Pressure Coolant Injection, and Automatic Depressurization System are proposed to be combined into one specification, in recognition of the interdependence of the Operability requirements of these systems in meeting the assumptions of the design basis loss of coolant accident. In addition, supporting requirements concerning maintenance of filled discharge piping and the LPCI MOV independent power supply have been included along with the Surveillances of the ECCS.	3.5.1	3/4.5.A, 3/4.5.C, 3/4.5.D, 3.5.G, 3.9.F.1
A3	The CTS requires a simulated automatic actuation test of CS, LPCI, and HPCI. The ITS maintains this Surveillance, but includes a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance. This Note, therefore, is explicit recognition that the ITS Surveillance can be satisfied by a series of overlapping tests. Since surveillance testing of CS, LPCI, and HPCI do not presently require actual injection, and are all currently satisfied by a series of overlapping tests, the addition of the Note excluding vessel injection/spray is an administrative change. In addition, the CTS requires a simulated actuation test to be performed on the ADS valves. A Note is proposed to be added to exclude valve actuation, similar to the ECCS pumps Notes.	SR 3.5.1.10, SR 3.5.1.11	4.5.A.1.a, 4.5.A.3, 4.5.C.1, 4.5.D.1
A4	The CTS specifically state that the High Pressure Coolant Injection (HPCI) System and Automatic Depressurization System (ADS) valves are not required to be Operable during low power physics testing and during reactor operator (criticality) training provided the reactor coolant temperature ≤ 212°F. However, the CTS does not require the HPCI System to be Operable when the reactor coolant temperature is ≤ 212°F and does not require the ADS valves to be Operable in cold condition (i.e., reactor coolant temperature is ≤ 212°F). Therefore, these explicit redundant requirements are not retained in the ITS.	N/A	3.5.C.2, 3.5.D.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A5	Not used.	N/A	N/A
A6	The CTS requires that following any period where the LCPI or CS subsystems have not been maintained in a filled condition; the discharge piping of the affected subsystem shall be vented from the high point of the system and water flow observed prior to declaring the subsystem operable. This requirement has not been included in the ITS since it is redundant to the ITS SR 3.0.1 requirements.	SR 3.0.1	4.5.G.2
A7	The CTS requires that the "reactor shall not be started up with the RHR System supplying cooling to the fuel pool" and that "the RHR System shall not supply cooling to the spent fuel pool when the reactor coolant temperature is above 212°F." These statements are not necessary since ITS LCO 3.0.4 ensures that the LPCI subsystems are Operable (as required by another specification) prior to entering MODE 3.	LCO 3.0.4	3.5.A.4
A8	The CTS does not have a specific ACTION to enter LCO 3.0.C if sufficient ECCS subsystems are inoperable. However, entry into LCO 3.0.C is implicit, since ACTIONS are not provided for all instances of inoperabilities. In the ITS, a specific ACTION has been added that delineates when ITS LCO 3.0.3 is to be entered. In addition, the CTS requires that "the reactor shall be brought to cold condition within 24 hours" when both LPCI independent power supplies are made or found to be inoperable. This specific default action has been changed to require entry into LCO 3.0.3 since the plant will be outside of its design basis in the condition. This portion of the change may be considered as more restrictive, but since the current Completion Times in CTS 3.9.F.3 and CTS 3.0.C are equivalent, this change is classified as administrative.	3.5.1 ACTION H	3.5.A, 3.5.C, 3.5.D, 3.9.F.3
A9	The requirements in CTS 3.5.A.3.b and CTS 4.5.A.3.b concerning the LPCI cross tie valves have been simplified into one Surveillance in the ITS that requires the verification that the valves are closed and power is removed from the electrical valve operator every 31 days. The details on how this is performed have been relocated to the Bases in accordance with DOC LA4.	SR 3.5.1.4	3.5.A.3.b, 4.5.A.3.b
A10	The CTS requires the associated ECCS pump (i.e., LPCI, CS, and HPCI) to be declared inoperable for the purposes of satisfying CTS 3.5.A and 3.5.C, when the associated pump discharge piping cannot be maintained in a filled condition. This explicit cross reference is not required in the ITS since this CTS requirement is included along with the requirements of the associated system.	N/A	3.5.G.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A11	CTS 4.5.G.1 requires the discharge piping of the required ECCS subsystem to be vented every month prior to the testing of the LPCI and CS subsystems. This explicit requirement to perform the surveillance prior to the testing of the LPCI and CS subsystems has been deleted. The requirement to perform this surveillance every 31 days is sufficient to ensure the discharge piping is full whenever the system is required to be Operable. This change is necessary since the ECCS subsystems flow rate Surveillances (e.g., CTS 4.5.A.1.b) are no longer tested every month. The Frequency of these Surveillances have been changed to "In accordance with the Inservice Testing Program" in recently approved Technical Specification Licensing Amendment 241. CTS 4.5.G.1 should have been modified during the process of the change. This will make the Surveillance consistent with other parts of the CTS and is therefore considered to be administrative since the current Surveillance Frequency is every 31 days.	N/A	4.5.G.1
A12	The requirement in CTS 3.9.F.2.a that operations may continue only if the other LPCI independent power supply battery including its battery charger, and distribution system is Operable has been deleted. The ITS includes ACTIONS for when two LPCI subsystems are inoperable, thus this ACTION covers the inverter and bus. In addition, the requirements of the battery and battery charger are included in ITS 3.8.4, while the requirements of battery cell parameters are included in ITS 3.8.6. ITS 3.8.4 requires the associated LPCI subsystem to be declared inoperable immediately when the LPCI independent power supply battery or battery charger are inoperable. When a battery cell parameter is not within limits, either the battery is still Operable, or if not then the ACTIONS of ITS 3.8.6 require the associated LPCI battery to be declared inoperable (which will result in the associated LPCI subsystem being declared inoperable). Therefore, the specific requirement is not necessary to be included in the ITS.	N/A	3.9.F.2.a
A13	Not used.	N/A	N/A
3.5.2, ECCS - SHUTDOWN			
A1	Editorial changes, reformatting, and revised numbering.	3.5.2	3/4.5.F, 3/4.5.G, Table 4.2-2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS does not directly address the OPERABILITY status of LPCI during alignment and operation for decay heat removal. The ITS includes a Note that states that one LPCI subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. This allowance is consistent with the CTS Bases description, which states that a LPCI subsystem operating in the shutdown cooling mode of RHR is considered operable for the ECCS function if it can be realigned manually (either remote or local) to the LPCI mode and is not otherwise inoperable.	SR 3.5.2.4 Note	4.5.F Bases description
A3	The CTS requires two low pressure Emergency Core Cooling subsystems to be Operable when work is being performed with the potential for draining the vessel and requires one low pressure Emergency Core Cooling subsystem to be Operable when no work is being performed with the potential for draining the reactor vessel. The ITS is identical although the format of presentation of these requirements are different. The ITS requires two low pressure ECCS injection/spray subsystems to be Operable. It does not distinguish whether work is being performed with the potential for draining the reactor vessel (OPDRVs). If no OPDRVs are occurring and only one ECCS injection/spray subsystem is Operable, the Specification is met since ITS ACTION B allows continuous operation in this condition.	LCO 3.5.2, 3.5.2 ACTION B	3.5.F.1, 3.5.F.2
A4	The CTS requirement to establish Secondary Containment Integrity has been changed in the ITS to a) initiate action to restore secondary containment to OPERABLE status, b) initiate action to restore one standby gas treatment subsystem to OPERABLE status, and c) initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated. The CTS definition of Secondary Containment Integrity has been deleted as discussed in the Discussion of Changes for ITS Chapter 1.0. These three proposed Required Actions will ensure all aspects of secondary containment integrity are maintained.	3.5.2 Required Actions D.1, D.2, and D.3	3.5.F.4
A5	The CTS requires the associated ECCS pump (i.e., LPCI and CS) to be declared inoperable for the purposes of satisfying Specifications 3.5.A, 3.5.C and 3.5.E, when the associated pump discharge piping cannot be maintained in a filled condition. This explicit cross reference is not included in the ITS since this CTS requirement is included along with the requirements of the associated system.	N/A	3.5.G.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	CTS 4.5.G.1 requires the discharge piping of the required ECCS subsystem to be vented every month prior to the testing of the LPCI and CS subsystems. This explicit requirement to perform the surveillance prior to the testing of the LPCI and CS subsystems has been deleted. The requirement to perform this surveillance every 31 days is sufficient to ensure the discharge piping is full whenever the system is required to be Operable. This change is necessary since the ECCS subsystems flow rate Surveillances (e.g., CTS 4.5.A.1.b) are no longer tested every month. The Frequency of these Surveillances have been changed to "In accordance with the Inservice Testing Program" in recently approved Technical Specification Licensing Amendment 241. CTS 4.5.G.1 should have been modified during the process of the change. This will make the Surveillance consistent with other parts of the CTS and is therefore considered to be administrative since the current Surveillance Frequency is every 31 days.	SR 3.5.2.3	4.5.G.1
A7	The CTS requires a simulated automatic actuation test of CS and LPCI. The ITS maintains this Surveillance, but includes a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance. This Note, therefore, is explicit recognition that proposed SR 3.5.2.6 can be satisfied by a series of overlapping tests. Since surveillance testing of CS and LPCI do not presently require actual injection, and are all currently satisfied by a series of overlapping tests, the addition of the Note excluding vessel injection/spray is an administrative change.	SR 3.5.2.6 Note	Table 4.2-2 Note 7
A8	The CTS requires that following any period where the LCPI or CS subsystems have not been maintained in a filled condition; the discharge piping of the affected subsystem shall be vented from the high point of the system and water flow observed prior to declaring the subsystem operable. This requirement has not been included in the ITS since it is redundant to the ITS SR 3.0.1 requirements.	SR 3.0.1	4.5.G.2
3.5.3, RCIC SYSTEM			
A1	Editorial changes, reformatting, and revised numbering.	3.5.3	3/4.5.E, 3/4.5.G
A2	The CTS requires the RCIC pump to be declared inoperable when the associated pump discharge piping cannot be maintained in a filled condition. This explicit cross reference is not required in the ITS since this CTS requirement is included along with the requirements of the RCIC System.	N/A	4.5.G.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	The CTS requires a simulated automatic actuation test of the RCIC System. The ITS maintains this Surveillance, but includes a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance. This Note, therefore, is explicit recognition that the ITS Surveillance can be satisfied by a series of overlapping tests. Since surveillance testing of RCIC does not presently require actual injection, and is currently satisfied by a series of overlapping tests, the addition of the Note excluding vessel injection is an administrative change.	SR 3.5.3.5 Note 2	4.5.E.1.a
A4	Not used.	N/A	N/A
A5	The CTS specifically state that the RCIC System is not required to be Operable during low power physics testing and during reactor operator (criticality) training provided the reactor coolant temperature ≤ 212°F. However, the CTS does not require the RCIC System to be Operable when the reactor coolant temperature is ≤ 212°F. Therefore, this explicit redundant requirement is not retained in the ITS.	N/A	3.5.E.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, PRIMARY CONTAINMENT		
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	1.0.M, 3/4.7.A.2, 3.7.A.5.e, 3.7.A.8, 4.7.A.1, 4.7.A.3, 4.7.A.5.d
A2	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.1 requires that the primary containment shall be OPERABLE.	LCO 3.6.1.1	3.7.A.2
A3	The CTS requirement to perform required visual examination and leakage rate testing of the Primary Containment has been modified to include an exception for primary containment air lock testing, since in the ITS, the air lock testing is included in another Specification (ITS 3.6.1.2).	SR 3.6.1.1.1	4.7.A.2.a
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS		
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	1.0.M, 3.7.A.2, 3.7.A.8, 4.7.A.2.a
A2	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.2 requires that the primary containment air locks shall be OPERABLE.	3.6.1.2	3.7.A.2
A3	The ITS Surveillance that requires leakage rate testing of the air locks includes a Note that states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This Note is consistent with the CTS 1.0.M Primary Containment Integrity condition requirement that at least one door in each air lock is closed and sealed.	SR 3.6.1.2.1 Note 1	1.0.M, 4.7.A.2.a

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	Not used.	N/A	N/A
A5	The ITS includes a Note that requires the applicable Conditions and Required Actions of ITS 3.6.1.1, Primary Containment, to be entered when air lock leakage exceeds the overall Primary Containment leakage rate acceptance criteria. This Note establishes the need to consider the Primary Containment OPERABILITY if the air lock leakage acceptance criteria is not being met. This change is consistent with the relationship of containment integrity and air lock OPERABILITY established in the CTS definition of Containment Integrity. In addition, the ITS leakage rate test is modified by a Note that states the "Results shall be evaluated against criteria applicable to SR 3.6.1.1.1". ITS SR 3.6.1.1.1 is the primary containment leakage rate test and will ensure that air lock leakage is properly accounted for in determining the combined Type B and C primary containment leakage, consistent with the CTS requirements.	3.6.1.2 ACTIONS Note 3, SR 3.6.1.2.1 Note 2	1.0.M, 4.7.A.2.a
3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES (PCIV)			
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.3	1.0.M, Table 4.2-1, 3.7.A.2, 3/4.7.D, 3.7.A.8, 4.7.A.2.b, 4.7.A.2.c, 4.7.B.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	Three Notes have been included in the ITS that are consistent with the intent of the CTS. ITS 3.6.1.3 Note 2, which allows separate Condition entry for each penetration flow path, provides explicit instructions for proper application of the ACTIONS for Technical Specification compliance. In conjunction with the proposed Specification 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing ACTIONS for inoperable isolation valves. ITS 3.6.1.3 Note 3, to enter applicable Conditions and Required Actions for systems made inoperable by PCIVs, establishes the need to verify individual system OPERABILITY based on the affect of an INOPERABLE PCIV. This requirement is consistent with individual CTS Surveillance Requirements to verify valve OPERABILITY and/or correct position. ITS 3.6.1.3 Note 4, to enter the applicable Conditions and Required Actions of ITS 3.6.1.1, Primary Containment, when PCIV leakage exceeds the overall Primary Containment leakage rate acceptance criteria, establishes the need to consider the Primary Containment OPERABILITY if the PCIV leakage acceptance criteria is not being met. This change is consistent with the relationship of containment integrity and PCIV OPERABILITY established in the CTS 1.0.M definition of Containment Integrity. In addition, Note 4 clarifies that "systems" include the primary containment. Since proposed LCO 3.0.6 waives the requirement to cascade, the intent of the CTS would not necessarily apply. The clarification provided by the Note is consistent with the intent and interpretation of the existing Technical Specifications.	3.6.1.3 ACTIONS Notes 2, 3, and 4	3/4.7.D
A3	The CTS requirement, when one PCIV is inoperable, to maintain at least one isolation valve operable in each affected penetration that is open, is not explicitly included in the ITS. The ITS is equivalent through its Conditions and Notes for one and two or more inoperable PCIVs in a penetration.	3.6.1.3 Condition B	3.7.D.2
A4	The CTS requirement, when a PCIV is inoperable, to "restore the inoperable valve(s) to operable status," has been deleted since this is always an option and does not need to be specified in the ITS.	N/A	3.7.D.2.a
A5	The CTS requirement to record the results of the PCIV position verification is not included in the ITS, since it is duplicative of the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests/verifications, and compliance with 10 CFR 50 Appendix B is required by the JAFNPP Operating License.	N/A	4.7.D.2
A6	Not used.	N/A	N/A
A7	Not used.	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	The ITS provides an exception for reactor building-to-suppression chamber vacuum breakers, in that they are not included in the PCIV Specification. Although, reactor building-to-suppression chamber vacuum breakers isolate primary containment penetrations, they are excluded from this specification since reactor building-to-suppression chamber vacuum breakers OPERABILITY requirements are currently specified in another CTS Specification and retained in a separate ITS Specification. Along with this change, the explicit requirement in the CTS that all instrument line excess flow check valves must be Operable has not been specifically stated in the ITS LCO statement, since the valves are considered PCIVs.	LCO 3.6.1.3	3.7.D.1
A9	The CTS requirement to test PCIVs that are power operated and automatically initiated for simulated automatic initiation per the IST Program is being revised to more accurately present the requirements as intended. Since the IST Program does not specify the method used to initiate a test for closure timing, the ITS verification that each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal is provided. The Frequency of 24 months has been included consistent with the IST Program and the requirements of CTS Table 4.2-1 (Note 7), Primary Containment Isolation System Instrumentation Test Calibration Requirements.	SR 3.6.1.3.7	4.7.D.1.a
A10	CTS 4.7.D.1.c, which specifies that all normally open power operated isolation valves (except for the main steam isolation valves) shall be fully closed and reopened at a Frequency in accordance with the IST Program, is encompassed by CTS 4.7.D.1.a. Therefore, the ITS includes a single Surveillance for these two requirements; the redundancy is unnecessary.	SR 3.6.1.3.5	4.7.D.1.a, 4.7.D.1.c
A11	The CTS reference to "Primary Containment Integrity" has been deleted since the CTS definition of Primary Containment Integrity in CTS 1.0.M is incorporated into ITS 3.6.1.1, 3.6.1.2 and 3.6.1.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.1.3 requires that the primary containment isolation valves shall be OPERABLE.	3.6.1.3	3.7.A.2
3.6.1.4, DRYWELL PRESSURE			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.6.1.5, DRYWELL AIR TEMPERATURE			
NONE	NONE	NONE	NONE
3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS			
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.6	3/4.7.A.4, 3.7.A.8
3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS			
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.7	3/4.7.A.5, 3.7.A.8
A2	The ITS includes a Note that the vacuum breakers are not required to be closed " when performing their intended function," in recognition that the automatic cycling of the vacuum breakers does not violate the intent of the CTS LCO.	SR 3.6.1.7.1 Note 2	3/4.7.A.5
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION SYSTEM			
NONE	NONE	NONE	NONE
3.6.1.9, RHR CONTAINMENT SPRAY SYSTEM			
A1	Editorial changes, reformatting, and revised numbering.	3.6.1.9	3/4.5.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The ITS includes the phrase "or can be aligned to the correct position" in recognition that the required lineup for ECCS OPERABILITY requires the RHR System to be in a lineup other than that necessary to perform the containment spray function and that the containment spray function is manually actuated (requiring repositioning of valves and starting of the RHR pump by the operator), consistent with CTS interpretation and practices.	SR 3.6.1.9.1	4.5.B.1.e
A3	The CTS Surveillance that requires the pump operability and flow rate test on the RHR pumps references another CTS Surveillance with respect to the Frequency. The Frequency in the other CTS Specification is in accordance with the Inservice Testing Program. The ITS does not include the cross-reference; but includes the actual Frequency (in accordance with the Inservice Testing Program).	SR 3.6.1.9.2	4.5.B.1.a
A4	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHR containment spray component is inoperable. These explicit verifications have all been deleted.	N/A	4.5.B.3
3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE			
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.7.A.1, 3.7.A.8, Table 4.2-8
A2	Not used.	N/A	N/A
A3	CTS 4.7.A.1 requires the torus temperature to be monitored as specified in CTS Table 4.2-8. The Frequency of the Surveillance in CTS Table 4.2-8 is daily. The ITS does not include the cross-reference; but includes the actual Frequency (24 hours).	SR 3.6.2.1.1	4.7.A.1, Table 4.2-8
A4	During testing that adds heat to the suppression pool, the CTS requires the pool temperature to be continuously recorded until heat is terminated or in lieu of continuously recording, the operator shall log the temperature every 5 minutes. In the ITS, the continuous recording or logging requirement is not included, since it is duplicative of the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests/verifications, and compliance with 10 CFR 50 Appendix B is required by the JAFNPP Operating License.	N/A	4.7.A.1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A5	The CTS requires the maximum water temperature of the suppression pool to be ≤ 95°F during normal power operation. The CTS also defines "Reactor Power Operation" to be any operation with the Reactor Mode Switch in the Startup/ Hot Standby or Run position with reactor critical and above 1% rated thermal power. The ITS requires the suppression pool average temperature to be ≤ 95°F when THERMAL POWER is > 1% RTP and "no testing that adds heat to the suppression pool is being performed." The addition of the words concerning testing (no testing) is considered an administrative change since testing is accounted for in the suppression pool temperature limits in the CTS. The exclusion of the details concerning the Reactor Mode Switch position and whether or not the reactor is critical is also considered to be an administrative change, since the ITS Applicability, the MODES Table, and the requirement that the LCO is applicable when THERMAL POWER is > 1% RTP are sufficient.	LCO 3.6.2.1.a	3.7.A.1.c. (1)
3.6.2.2, SUPPRESSION POOL WATER LEVEL			
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.7.A.1, 3.7.A.8
A2	CTS 4.7.A.1 requires the torus water level to be monitored as specified in CTS Table 4.2-8. The Frequency of the Surveillance in CTS Table 4.2-8 is daily. The ITS does not include the cross-reference; but includes the actual Frequency (24 hours).	SR 3.6.2.2.1	4.7.A.1, Table 4.2-8
3.6.2.3, RHR SUPPRESSION POOL COOLING			
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.5.B
A2	The ITS includes the phrase "or can be aligned to the correct position" in recognition that the required lineup for ECCS OPERABILITY requires the RHR System to be in a lineup other than that necessary to perform the containment spray function and that the containment cooling function is manually actuated (requiring repositioning of valves and starting of the RHR pump by the operator), consistent with CTS interpretation and practices.	SR 3.6.2.3.1	4.5.B.1.e

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHR suppression pool cooling component is inoperable. These explicit verifications have all been deleted.	N/A	4.5.B.3
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE			
A1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.7.A.7
A2	The CTS cross-reference to the requirements in Table 4.2-8 are not included since they are redundant to the normal instrumentation requirements.	N/A	4.7.A.7.a
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION			
A1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.7.A.6
A2	The CTS cross-reference to the requirements in Table 4.2-8 are not included since they are redundant to the normal instrumentation requirements.	N/A	4.7.A.6.a
3.6.3.2, CAD SYSTEM			
NONE	NONE	NONE	NONE
3.6.4.1, SECONDARY CONTAINMENT			
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.1	1.0.S, 3/4.7.C

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.1 Applicability	3.7.C.1
A3	The CTS Surveillance Requirements to perform preoperational and other tests during the first operating cycle are deleted since preoperational testing and the first refueling cycle has already been completed.	N/A	4.7.C.1.a, 4.7.C.1.b
A4	The CTS reference to "Secondary Containment Integrity" has been deleted since the CTS definition of Secondary Containment Integrity in CTS 1.0.S is incorporated into ITS 3.6.4.1, 3.6.4.2 and 3.6.4.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.4.1 requires that the secondary containment shall be OPERABLE.	LCO 3.6.4.1	3.7.C.1
A5	Not used.	N/A	N/A
	3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES		
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	1.0.S, Table 4.2-1, 3.7.C, RETS Table 3.10-2
A2	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.2 Applicability	3.7.C.1
A3	ITS 3.6.4.2 Note 3, to enter applicable Conditions and Required Actions for systems made inoperable by SCIVs, establishes the need to verify individual system OPERABILITY based on the affect of an INOPERABLE SCIV. This requirement is consistent with individual CTS Surveillance Requirements to verify valve OPERABILITY and/or correct position.	3.6.4.2 ACTIONS Note 3	3.7.C

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS reference to "Secondary Containment Integrity" has been deleted since the CTS definition of Secondary Containment Integrity in CTS 1.0.S is incorporated into ITS 3.6.4.1, 3.6.4.2 and 3.6.4.3 and is no longer maintained as a separate definition in the ITS. ITS 3.6.4.2 requires that the secondary containment isolation valves shall be OPERABLE.	LCO 3.6.4.2	3.7.C.1
A5	Not used.	N/A	N/A
A6	The detail in the RETS identifying how the Logic System Functional Test (LSFT) is to be performed (i.e., where possible using test jacks) has not been included in the ITS since the definition of LSFT provides the necessary guidance.	LSFT definition	RETS Table 3.10-2 Note f
	3.6.4.3, STANDBY GAS TREATMENT SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.6.4.3	1.0.S, 3/4.7.B, 3.7.C, Table 4.2-1, RETS Table 3.10-2
A2	The CTS requirements for ventilation filter testing are moved to ITS 5.5.8 "Ventilation Filter Testing Program (VFTP)". ITS SR 3.6.4.3.2 requires that the SGT filter testing be performed in accordance with the Ventilation Filter Testing Program to determine the Operability of the SGT System.	SR 3.6.4.3.2, 5.5.8	4.7.B.1.a, 4.7.B.1.b, 4.7.B.1.c
A3	The CTS Applicability is clarified in the ITS (by stating when it is applicable, not when it is not applicable) to be MODES 1, 2, and 3, during movement of irradiated fuel assemblies in the secondary containment, during Core Alterations, and during OPDRVs. In addition, the CTS requirements that CTS 3.3.A, Shutdown Margin be met have been deleted since they are duplicative of the requirements of ITS 3.1.1, SHUTDOWN MARGIN (SDM).	3.6.4.3 Applicability	3.7.B.1, 3.7.C.1
A4	The CTS requires manual operability of the bypass valve for Standby Gas Treatment (SGT) subsystem filter cooling to be demonstrated (for each subsystem). The ITS requires cycling of each SGT subsystem filter cooling cross-tie valve (cooler bypass valve), consistent with the current practice and interpretation.	SR 3.6.4.3.4	4.7.B.1.e
A5	The CTS requires the redundant SGT subsystem to be verified to be operable immediately and daily thereafter when an SGT subsystem is inoperable. This explicit verification has been deleted.	N/A	4.7.B.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The detail in the RETS identifying how the Logic System Functional Test (LSFT) is to be performed (i.e., where possible using test jacks) has not been included in the ITS since the definition of LSFT provides the necessary guidance.	LSFT definition	RETS Table 3.10-2 Note f
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, RHRSW SYSTEM		
A1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.5.B
A2	The CTS footnote that provides an additional 4 days to operate with an inoperable RHRSW subsystem during the installation of modification 00-125 has not been included in the ITS since the modification is complete.	N/A	3.5.B.3 footnote *
	3.7.2, ESW SYSTEM and UHS		
A1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.11.D, 3/4.11.E
A2	The CTS allows 7 days of operation with one Emergency Service Water (ESW) System inoperable. The ITS includes a Note that would require the applicable Conditions and Required Actions of ITS 3.8.1, "AC Sources — Operating, "to be entered for the Emergency Diesel Generator (EDG) subsystem made inoperable by ESW. This Note is an exception to proposed LCO 3.0.6 which ensures proper ACTIONS are taken for an inoperable EDG subsystem. This Note is consistent with the current requirements, since the CTS only allows 7 days of operation if the operable Emergency Diesel Generator System is demonstrated to be operable immediately and daily thereafter.	3.7.2 Required Action A.1 Note	3.11.D.2
A3	The ESW instrumentation surveillance requirements have been moved to ITS 3.3.7.3, "Emergency Service Water (ESW) System Instrumentation".	3.3.7.3	4.11.D.1.e, 4.11.D.1.f
A4	The CTS requirements for intake deicing heaters have been included with the requirements of ESW and the Ultimate Heat Sink (UHS), since the intake deicing heaters help to ensure adequate flow to the ESW and Residual Heat Removal System.	3.7.2	3/4.11.E
A5	The CTS requires the intake deicing heaters to be Operable when intake water temperature is less than or equal to 37°F. When these heaters are inoperable the default action is to be in the cold condition (MODE 4). In the ITS, the Applicability of the deicing heaters is MODE 1, 2 and 3, consistent with the requirements of the ESW System. In addition, the ITS includes a Note in the applicable surveillances related to the heaters that these SRs are not required to be met at lake temperatures > 37°F.	3.7.2 Applicability, SR 3.7.2.3, SR 3.7.2.5, SR 3.7.2.6	3.11.E

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SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	The CTS requires the weekly verification of the six heater feeder ammeters. The ITS requires the verification of the "required" deicing heater feeder current for each division of deicing heaters. Since the CTS only requires 18 out of 88 heaters to be OPERABLE (modified by DOC M3), there is no reason to require the measurement of all heater feeder ammeters.	SR 3.7.2.3	4.11.E.1
A7	The CTS requires a valve alignment check every 31 days. The ITS includes a Note that clarifies that the isolation of flow to an individual component does not necessarily render the ESW System inoperable; only the individual component is considered inoperable. This is consistent with current practice and the intent of the CTS.	SR 3.7.2.4 Note	4.11.D.1.c
A8	The CTS requirements to monitor the individual heater current once every 6 months has been changed to require the verification of the required deicing heater power, consistent with current practice and the intent of the CTS.	SR 3.7.2.5	4.11.E.2
3.7.3, CREVAS SYSTEM			
A1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.11.A
A2	The specific CTS requirements for the periodic verification of the filter trains associated with the Control Room Emergency Ventilation Air Supply (CREVAS) System have been moved to ITS 5.5.8, the Ventilation Filter Testing Program (VFTP). This ITS Specification will include a Surveillance that will require performing CREVAS System filter testing in accordance with the VFTP.	SR 3.7.3.2, 5.5.8	4.11.A.1.a, 4.11.A.1.b, 4.11.A.1.c, 4.11.A.2
3.7.4, CONTROL ROOM AC SYSTEM			
NONE	NONE	NONE	NONE

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SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS		
A1	Editorial changes, reformatting, and revised numbering.	3.7.5	RETS 3.5, RETS Tables 3.10-1 and 3.10-2
A2	The RETS specifies the limitations and surveillance requirements for gross radioactivity (beta and/or gamma) rate of noble gases. The ITS only places limitations on the gross gamma activity rate of the noble gases instead of "beta and/or gamma". The option to measure the beta rate of activity has been deleted since JAFNPP utilizes the gross gamma approach which is consistent with industry practice.	LCO 3.7.5, SR 3.7.5.1	RETS 3.5.a (LCO and SR sections)
	3.7.6, MAIN TURBINE BYPASS SYSTEM		
NONE	NONE	NONE	NONE
	3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL		
A1	Editorial changes, reformatting, and revised numbering.	3.7.7	3/4.10.C
	CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES		
NONE	NONE	NONE	NONE
	CTS 3/4.11.C, BATTERY ROOM VENTILATION		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC SOURCES - OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.8.1	3.9.A, 3/4.9.B, 3/4.9.C.2, 3.0.E
A2	The CTS specifies the conditions under which the EDG system is required will be simulated to demonstrate that the pair of diesel generators will start, accelerate, force parallel and accept the emergency loads in the prescribed sequence. The ITS is clarified to require verification that the diesel generator, in response to loss of power signal in conjunction with an ECCS initiation signal will auto-start from a standby condition and energize as required permanently connected loads within the required time and auto-connected emergency loads in the prescribed sequence.	SR 3.8.1.12	4.9.B.4
A3	The CTS monthly requirement to start, accelerate, force parallel and load each pair of EDGs and run until both EDGs are at steady state temperature conditions has been divided into two separate Surveillance Requirements; a start test and a load test. In addition, due to this splitting, the ITS includes a Note to clarify the requirement that the load test must be preceded by and immediately follow, without shutdown, a successful start test.	SR 3.8.1.2, SR 3.8.1.3 including Note 4	4.9.B.1
A4	The CTS requires that the paralleled EDG pair be loaded until both EDGs are at steady state temperature conditions. The ITS requires that the loaded EDG pair be run for ≥ 60 minutes, since this is the minimum run time to stabilize engine temperatures.	SR 3.8.1.3	4.9.B.1
A5	The CTS includes a LCO statement related to the Diesel Fuel Oil Transfer System OPERABILITY. The ITS does not include a specific LCO statement, as it is part of the AC Sources LCO statement, and is ensured by an ITS Surveillance Requirement.	LCO 3.8.1	3.9.C.2
A6	The CTS does not provide specific Actions for the condition of three or more AC sources inoperable and therefore entry into CTS 3.0.C is required. Since the ITS format allows multiple Conditions to be entered simultaneously, with three or more AC sources inoperable, ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. However, consistent with the CTS default to CTS 3.0.C, ITS 3.8.1 ACTION G will require direct entry into ITS LCO 3.0.3.	3.8.1 ACTION G	3.9.B
A7	The wording in the CTS related to the criteria for determining whether a potential common cause EDG failure exists is editorially changed in the ITS to require a determination of whether the other Operable EDG and EDG subsystems are not inoperable due to common cause failure.	3.8.1 Required Action B.3.1	4.9.B.5.a, 4.9.B.5.b, 4.9.B.5.c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A8	The ITS includes a Note in certain EDG Surveillances to allow all EDG subsystem starts to be preceded by an engine prelube period to minimize wear and tear on the EDGs during testing. This is consistent with the CTS since the EDGs at JAFNPP are not immediately loaded upon startup and run in a continuous prelube mode of operation. In addition, the Note to ITS SR 3.8.1.2 also allows a warmup period prior to loading. This is consistent with current practices since the EDGs are not immediately loaded upon startup, but are allowed to warmup for a short time after startup while the operation staff performs post startup EDG checks.	SR 3.8.1.2, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12	4.9.B.1, 4.9.B.4
A9	The CTS provides an allowance that the 7 day allowed outage time for a single offsite circuit can be extended to 14 days (for line #3 and associated transformer only) during the period from 9/9/01 through 9/23/01. Since the time period has been exceeded, this allowance is not applicable anymore, and is not included in the ITS	N/A	CTS 3.9.B.1 footnote*
3.8.2, AC SOURCES - SHUTDOWN			
A1	Editorial changes, reformatting, and revised numbering.	3.8.2	3.9.D
A2	The CTS requirement for one offsite power source and one Emergency Diesel Generator (EDG) subsystem OPERABLE, whenever any work is being done which has the potential for draining the vessel, secondary containment is required, or core or containment cooling is required is editorially changed in the ITS to require the AC power sources to be OPERABLE when required to support ITS LCO 3.8.8, "Distribution Systems — Shutdown". Actual changes to the requirements are discussed elsewhere.	LCO 3.8.2 and Applicability	3.9.D
A3	The ITS includes a Note that requires the applicable Condition and Required Actions of ITS LCO 3.8.8, "Distribution Systems — Shutdown" be entered when any required division is de-energized as a result of Condition A. While the CTS does not explicitly require this in this Specification, this is consistent with the requirements of the CTS (definition of Operability).	3.8.2 Required Action A Note	Definition of Operability
3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR			
A1	Editorial changes, reformatting, and revised numbering.	3.8.3	3/4.9.C.1, 3.9.C.3, 4.9.B.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	Consistent with the CTS, the ITS includes a Note that specifically allows separate Condition entry for each EDG. In conjunction with ITS Section 1.3, Completion Times, this Note provides explicit instructions for proper application of the new Specification. It is intended that each Required Action be applied separately for each affected EDG regardless of whether it had been applied previously for inoperable diesel fuel oil, lube oil or starting air functions.	3.8.3 ACTIONS Note	3.9.C.3
3.8.4, DC SOURCES - OPERATING			
A1	Editorial changes, reformatting, and revised numbering.	3.8.4	3/4.9.E, 3/4.9.F
A2	The CTS requirement that operations may continue only if the other battery including its battery charger is Operable has not been included in the ITS, since the ITS requires the Division 1 and 2 125 VDC electrical power subsystems to be Operable, the ITS Bases specifies that this consists of both a battery and a charger, and there is no other ITS Condition that allows operation to continue with two 125 VDC electrical power subsystems.	N/A	3.9.E.2.a
A3	When one LPCI MOV independent power supply becomes unavailable, the CTS allows 7 days of operation consistent with the actions in CTS 3.5.A.2 for an inoperable LPCI subsystem. Since a LPCI MOV independent power supply subsystem is a support system for a LPCI subsystem, the ITS action is to "Declare the associated LPCI subsystem inoperable."	3.8.4 ACTION C	3.9.F.2
A4	The CTS requirement to be in cold shutdown within 24 hours if both station batteries are found to be inoperable is not retained as a specific action in the AC Sources - Operating Specification. In the ITS, entry into 3.0.3 will be required. Since the actions required by CTS 3.0.C are the same as the CTS actions stated above, this change is considered administrative (see ITS Chapter 3.0 DOCs for changes to CTS 3.0.C).	LCO 3.0.3	3.9.E.3
A5	For clarity and consistency, the CTS term "in service", when referring to the state of the DC Sources, has been replaced in the ITS with the term "OPERABLE."	LCO 3.8.4	3.9.E.1, 3.9.F.1
3.8.5, DC SOURCES - SHUTDOWN			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.6, BATTERY CELL PARAMETERS		
A1	Editorial changes, reformatting, and revised numbering.	3.8.6	3.9.E.1, 3.9.F.1, 4.9.E.1, 4.9.E.2, 4.9.F.1, 4.9.F.2
A2	The CTS includes the battery cell parameters as attributes of the DC Sources. In the ITS, a specific LCO statement is provided for the battery cell parameters.	LCO 3.8.6	3.9.E.1, 3.9.F.1
A3	The CTS requires the voltage of each cell to be measured to nearest 0.01 V. The ITS is clarified to include the actual float voltage requirements in Table 3.8.6-1 (i.e. 2.13 V and 2.07 V), which is specified at a level of measurement tolerance corresponding to 0.01 V.	Table 3.8.6-1	4.9.E.2.a, 4.9.F.2.a
A4	Consistent with the CTS, the ITS includes a Note that specifically allows separate Condition entry for each battery. In conjunction with ITS Section 1.3, Completion Times, this Note provides explicit instructions for proper application of the new Specification. It is intended that each Required Action be applied separately for each affected battery regardless of whether it had been applied previously for inoperable battery cell parameters.	3.8.6 ACTIONS Note	3.9.E, 3.9.F
	3.8.7, DISTRIBUTION SYSTEMS - OPERATING		
A1	Editorial changes, reformatting, and revised numbering.	3.8.7	3.9.A, 3.9.E
A2	For clarity and consistency, the CTS terms "in service" and "energized", when referring to the state of the DC Sources, have been replaced in the ITS with the term "OPERABLE."	LCO 3.8.7	3.9.A2, 3.9.E.1
A3	The ITS includes a new ACTION for the loss of AC buses and for loss of 125 VDC buses requiring entry into LCO 3.0.3 if two or more electrical power distribution subsystems are inoperable that result in a loss of function. This is consistent with the CTS, since any AC or DC electrical power distribution subsystem inoperability currently requires entry into CTS LCO 3.0.C.	3.8.7 ACTION D	3.0.C

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SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN			
NONE	NONE	NONE	NONE

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SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, REFUELING EQUIPMENT INTERLOCKS		
A1	Editorial changes, reformatting, and revised numbering.	3.9.1	3/4.10.A
A2	CTS is proposed to be broken into two parts: ITS 3.9.1, "Refueling Equipment Interlocks" which covers in-vessel fuel movement only, with the reactor mode switch in refuel; and, ITS 3.9.2, "Refuel Position One-Rod-Out Interlock" which covers control rod withdrawal during MODE 5.	3.9.1	3/4.10.A
A3	The CTS is applicable "during Core Alterations" but then modifies this with the statement "except as specified in 3.10.A.5, 3.10.A.6, 3.10.A.7 and 3.10.D below." In the ITS, this cross reference to other Specifications is not included in the Applicability statement.	N/A	3.10.A.1
A4	The CTS requires the hoist load switch on the service platform hoist to be set at less than or equal to 400 lbs whenever it is to be used for handling fuel. This requirement is not incorporated in the ITS, since the service platform is no longer utilized at JAFNPP. In fact the service platform has been removed from the plant and any discussion of the service platform, or associated hoist has been eliminated from UFSAR, Section 7.6 which discusses the refueling interlocks.	N/A	3.10.A.4
	3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK		
A1	Editorial changes, reformatting, and revised numbering.	3.9.2	3/4.10.A
A2	CTS is proposed to be broken into two parts: ITS 3.9.1, "Refueling Equipment Interlocks" which covers in-vessel fuel movement only, with the reactor mode switch in refuel; and, ITS 3.9.2, "Refuel Position One-Rod-Out Interlock" which covers control rod withdrawal during MODE 5.	3.9.2	3/4.10.A
A3	The CTS is applicable "during Core Alterations" but then modifies this with the statement "except as specified in 3.10.A.5, 3.10.A.6, 3.10.A.7 and 3.10.D below." In the ITS, this cross reference to other Specifications is not included in the Applicability statement.	N/A	3.10.A.1
	3.9.3, CONTROL ROD POSITION		
A1	Editorial changes, reformatting, and revised numbering.	3.9.3	3.10.A.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	The CTS requires that fuel not be loaded into the reactor core unless all control rods are fully inserted. Implicit in this requirement is that, if all control rods are not fully inserted, action must be immediately taken to suspend loading of fuel assemblies into the core. In the ITS, an ACTION is added to explicitly require immediate suspension of loading of fuel assemblies into the core in the event that one or more control rods are not fully inserted.	3.9.3 ACTION A	3.10.A.2
3.9.4, CONTROL ROD POSITION INDICATION			
NONE	NONE	NONE	NONE
3.9.5, CONTROL ROD OPERABILITY - REFUELING			
NONE	NONE	NONE	NONE
3.9.6, REACTOR PRESSURE VESSEL WATER LEVEL			
NONE	NONE	NONE	NONE
3.9.7, RESIDUAL HEAT REMOVAL - HIGH WATER LEVEL			
NONE	NONE	NONE	NONE
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION		
A1	Editorial changes, reformatting, and revised numbering.	3.10.1	3/4.12.A
A2	The cross references to LCO 3.5.F, "ECCS — Cold Shutdown", and LCO 3.9, "Auxiliary Electrical Systems", respectively have been deleted. The requirements of these Specifications will be normally required in MODE 4 in the associated applicable Specifications of ITS Sections 3.5 and 3.8, therefore the cross references to these Specifications is not necessary.	N/A	3.12.A.1, 3.12.A.5
A3	The ITS includes a clarification to permit the suspension of the requirements of ITS 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling — Cold Shutdown." In addition, the ITS includes a clarification to change the temperature specified in Table 1.1-1 for MODE 4 to "NA". These clarifications have been made to clearly define the allowances of the proposed Specification, consistent with current practice and interpretation of the CTS.	LCO 3.10.1	3.12.A
A4	The CTS allows the reactor to be considered to be in COLD SHUTDOWN with reactor coolant temperature between 212°F and 300°F. The Applicability of the ITS is MODE 4 with average reactor coolant temperature > 212°F (the limit of 300°F has been relocated to the Technical Requirements Manual (TRM) in accordance with DOC LA1). Thus the ITS uses the inequality sign in lieu of the term "between."	LCO 3.10.1	3.12.A
	3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING		
NONE	NONE	NONE	NONE
	3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN		
NONE	NONE	NONE	NONE
	3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING		
A1	Editorial changes, reformatting, and revised numbering.	3.10.5	3/4.10.D
A2	The CTS provides restrictions on control rod and control rod drive maintenance. The ITS includes a restriction on all other CORE ALTERATIONS during the performance of this Special Operations LCO. This addition is considered administrative since CORE ALTERATIONS are addressed in CTS 3.10 (CTS 3.10.A.2 prohibits any fuel loading operations since all other control rods must be fully inserted unless loading in accordance with a spiral on-load. Since the spiral on-load allows refueling interlocks to be bypassed only in those cells which contain no fuel, fuel loading operations are not permitted when the plant is operating within CTS 3.10.D).	3.10.5.d	3.10.D
A3	The CTS includes cross references to other requirements concerning the removal of more than two control rods. These cross references are not included in the ITS since they are redundant to other LCOs.	N/A	3.10.D.2, 4.10.D.2
A4	The CTS allows two control rods to be withdrawn from the reactor core to perform maintenance. Therefore, since maintenance is allowed to be performed, the withdrawn control rods may not be Operable. In the ITS, this is covered by the Applicability, which is MODE 5 with LCO 3.9.5 not met.	3.10.5 Applicability	3.10.D
	3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING		
A1	Editorial changes, reformatting, and revised numbering.	3.10.6	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7
A2	The ITS includes an ACTION to 1) suspend withdrawal/removal of the control rod and removal of the CRD, 2) suspend loading of fuel assemblies, and 3) initiate action to insert all control rods in core cells containing fuel, or to satisfy the requirements of the LCO. The CTS only implies these actions (the control rods and CRDs can only be removed if the LCO requirements are met).	3.10.6 ACTION A	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A3	CTS 3.10.A.5.d requires fuel on-loading operations to be suspended until CTS 3.10.A.2 is satisfied. The requirement of CTS 3.10.A.2 is that fuel loading can commence if all control rods are fully inserted except as permitted by CTS 3.10.A.7. CTS 3.10.A.7 specifies the requirements of a spiral on-load. These cross references are not included in the ITS since the requirements of CTS 3.10.A.7 (spiral on-loading) have been incorporated directly in this ITS LCO and the refueling requirement of CTS 3.10.A.2 (fuel loading can commence if all control rods are fully inserted) is incorporated into ITS 3.9.3.	LCO 3.10.6.c, LCO 3.9.3	3.10.A.5.d
A4	The CTS requires the fuel assemblies, situated in the control cell of the control rod to be withdrawn, to be removed. This implies all other control rods are inserted since they would not be allowed to be withdrawn if operating under this LCO. For clarity, the ITS includes an explicit requirement that all other control rods in core cells containing one or more fuel assemblies be fully inserted.	LCO 3.10.6.b	3.10.A.5.b
A5	The CTS requires the verification that the control cell contains no fuel before the corresponding control rod is withdrawn whenever the reactor mode switch is in the refuel position and refueling interlocks are bypassed. This allowance is included in both the ITS LCO and a Surveillance Requirement.	LCO 3.10.6.a, SR 3.10.6.1	4.10.A.2
A6	The ITS adds an explicit Applicability, consistent with the intent of the CTS. This Applicability is MODE 5 with LCO 3.9.3, LCO 3.9.4, and LCO 3.9.5 not met. LCO 3.9.3, "Control Rod Position" requires all rods to be fully inserted. LCO 3.9.4, "Control Rod Position Indication" requires each control rod "full-in" position indication channel to be OPERABLE. LCO 3.9.5, "Control Rod OPERABILITY - Refueling" requires each withdrawn control rod to be OPERABLE. During multiple control rod withdrawals these requirements can not be met for those rods which are to be withdrawn.	3.10.6 Applicability	3/4.10.A.2, 3.10.A.5, 3.10.A.6, 3.10.A.7
3.10.7, CONTROL ROD TESTING - OPERATING			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.8, SHUTDOWN MARGIN TEST - REFUELING		
A1	Editorial changes, reformatting, and revised numbering.	3.10.8	3.6.E.3, Table 3.1-1, 3.5.B.5, 3.2.A, Table 3.2-1, 3.7.A.2, 3.7.A.4.a, 3.7.A.5.a, 3.7.D.1
A2	The explicit allowances in the CTS to allow S/RVs and components of the Containment Cooling Mode of the RHR System to be inoperable have been deleted since these allowances are permitted implicitly in the proposed Applicability of ITS 3.4.3 (for S/RVs), ITS 3.6.1.9 (for RHR Containment Spray), and 3.6.2.3 (for RHR Suppression Pool Cooling) and 3.7.1 (for RHR Service Water), and ITS 3.10.8.	3.4.3 Applicability, 3.6.1.9 Applicability, 3.6.2.3 Applicability, 3.7.1 Applicability, 3.10.8	3.6.E.3, 3.5.B.5
A3	The CTS provides an allowance that the provisions of CTS 3.0.D are not applicable when an S/RV is inoperable. The intent of this allowance was to allow the Safety/Relief Valves to be inoperable and allow entry into the low power physics testing or reactor operator training as allowed by the CTS. This explicit allowance has not been included in the ITS, as it is not necessary (CTS 3.0.D is only applicable when changing into modes of operation where the S/RVs are required to be Operable, and, in the case of the S/RVs, they are not required to be Operable during the specified conditions, therefore the explicit allowance is not required.)	N/A	3.6.E.4
A4	The requirements of CTS Table 3.1-1 for APRM Neutron Flux-Startup and APRM Inoperative have been moved to ITS LCO 3.10.8.a (ITS LCO 3.3.1.1, "Reactor Protection System Instrumentation", MODE 2 requirements for Function 2.a and 2.d of Table 3.3.1.1-1). This change is consistent with the modifications as discussed in the Discussion of Changes for ITS 3.3.1.1. In addition, the Surveillances required for these instruments have also been included in ITS 3.10.8.	LCO 3.10.8.a, SR 3.10.8.1	Table 3.1-1 Trip Functions APRM Neutron Flux-Startup and Fixed High Neutron Flux, including Note 7

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A1	Editorial changes, reformatting, and revised numbering.	4.0	5.0, RETS 1.0.L, RETS Figure 5.1-1
A2	Not used.	N/A	N/A
A3	The CTS allows use of fuel assemblies of designs that are approved by the NRC. In lieu of this, the ITS provides additional description of the various types of fuel designs (fuel assemblies with water rods, zirconium filler rods or stainless steel filler rods) allowed to be loaded in the core.	4.2.1	5.2.1
A4	The CTS states that the types of metal used in the control rods is described in UFSAR Section 3.4. In lieu of this reference, the ITS states that the control material shall be boron carbide or hafnium as approved by the NRC. This change provides clarifying information regarding the types of metal used in control rods, consistent with the UFSAR description.	4.2.2	5.2.2
A5	Not used.	N/A	N/A
A6	The CTS states that the nominal center to center distance between fuel assemblies placed in the storage racks are in accordance with the requirements of UFSAR Section 9.3. In lieu of this reference, the ITS provides the additional information referenced in UFSAR Section 9.3 for the two different storage rack types and dimensions.	4.3.1.1.c	5.5.1.1.c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, RESPONSIBILITY		
A1	Editorial changes, reformatting, and revised numbering.	5.1	6.0, 6.1, RETS 7.1
A2	The details of CTS 6.0, "Administrative Controls," which describe the content and use of the succeeding Specifications are being deleted, since the Administrative Controls are adequately covered by the subsequent ITS Specifications that are retained.	N/A	6.0
A3	The CTS title "Site Executive Officer" and RETS title "Resident Manager" are revised in the ITS by replacing plant specific management titles with generic titles as generally provided in ANSI N18.1-1971.	5.1.1	6.1, RETS 7.1.a
A4	The CTS statement that the Site Executive Officer is responsible for safe operation of the plant is revised. The ITS states that the plant manager (as modified by DOC A3) shall be responsible for overall plant operation, and establishes the requirement to designate, in writing, a successor.	5.1.1	6.1
	5.2, ORGANIZATION		
A1	Editorial changes, reformatting, and revised numbering.	5.2	6.2, Table 6.2-1, 6.3.2, 6.3.3, RETS 7.1.b
A2	Various CTS titles/terms are revised in the ITS by replacing plant specific management/personnel titles with generic titles as generally provided in ANSI N18.1-1971 and specifying the location of documentation is provided in the UFSAR. The specific replacements are: a) plant manager for Site Executive Officer, b) chief nuclear officer for Chief Nuclear Officer, c) radiation protection for Health Physics, d) radiation protection technician for an individual qualified in radiation protection procedures, e) operations manager for Operations Manager, and f) assistant operations manager for Assistant Operations Manager.	5.2	6.2, Table 6.2-1
A3	The responsibilities of the chief nuclear officer in the CTS are revised in the ITS to clarify that this individual "shall have corporate responsibility for overall plant nuclear safety."	5.2.1.c	6.2.1.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A4	The CTS statement that the Site Executive Officer is responsible for overall plant operation is editorially revised in the ITS to state that the plant manager (as modified by DOC A2) shall be responsible for overall safe operation of the plant.	5.2.1.b	6.2.1.2
A5	The CTS requirements that the STA be on site, and permits the STA position to be combined with one of the SRO positions, provided the individual meets the dual role SRO/STA qualification requirements are not included in the ITS since these issues are adequately addressed in the "Commission Policy Statement on Engineering Expertise on Shift," published in the October 28, 1985 Federal Register (50 FR 43621).	N/A	Table 6.2-1, including footnote *
A6	The CTS requires an SRO or an SRO with a license limited to fuel handling to directly supervise all CORE ALTERATIONS. This requirement is adequately addressed in 10 CFR 50.54(m)(2)(iv), and need not be repeated in the ITS.	N/A	6.2.2.2
A7	The CTS requires that the Shift Manager and Control Room Supervisor hold an SRO license and that the Senior Nuclear Operator and the Nuclear Control Operator hold an SRO or an RO license. Operator licensing requirements for these positions are adequately addressed in 10 CFR 50.54(l) and 10 CFR 55.2, and need not be repeated in the ITS.	N/A	6.2.2.5
A8	The CTS requirement concerning the STA qualifications is editorially revised in the ITS to clarify that the STA provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant, consistent with the guidance provided in NUREG-0737, the Commission Policy Statement on Engineering Expertise on Shift, and NRC Information Notice 93-8.	5.2.2.f	6.3.2
A9	The CTS requires that the STA meet the requirements of either Option 1 (combined SRO/STA position) or Option 2 (continued use of STA position); and that, when invoking Option 1, the STA role may be filled by the Shift Manager or the Control Room Supervisor. These details are adequately addressed in the "Commission Policy Statement on Engineering Expertise on Shift," and need not be repeated in the ITS.	N/A	6.3.2
A10	The CTS requires that any qualification deviations will be justified to the NRC prior to an individual's filling of one of the identified positions. This requirement is adequately addressed in the federal regulations (e.g., 10 CFR 50.54, 10 CFR 50.120) and need not be repeated in the ITS.	N/A	6.3.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.3, PLANT STAFF QUALIFICATIONS		
A1	Editorial changes, reformatting, and revised numbering.	5.3	6.3.1
A2	Not used.	N/A	N/A
A3	The CTS reference to staff positions shown in FSAR Figure 13.2-7 (Plant Staff Organization) has been deleted. The ITS retains the requirement for staff qualifications of ANSI N18.1-1971 but does not require the identification of the location of the plant organization chart.	N/A	6.3.1
A4	The ITS includes clarification that the minimum staffing requirements stipulated in 10 CFR 50.54(m) for personnel actively performing the functions of licensed Senior Reactor Operators (SROs) and Reactor Operators (ROs), can be exceeded without requiring a license amendment provided the SRO or RO functions and duties are divided and rotated in a manner which provided each SRO or RO with meaningful and significant opportunity to maintain proficiency.	5.3.2	N/A
	5.4, PROCEDURES		
A1	Editorial changes, reformatting, and revised numbering.	5.4	6.8, RETS 7.2
A2	The CTS requires that written procedures be implemented for programs specified in Appendix B, Radiological Effluent Technical Specifications (RETS), Section 7.2. This specification is not retained in the ITS because the specific programs specified in RETS 7.2 are retained in ITS 5.4.1.c and 5.4.1.e.	N/A	6.8.(A).4
A3	The RETS requires procedures be implemented for the Process Control Program (PCP). The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Since these types of procedures are also required by the CTS, which references Regulatory Guide 1.33, and are retained by the ITS, it is not necessary to specifically identify them again in the ITS.	N/A	RETS 7.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.5, PROGRAMS AND MANUALS		
A1	Editorial changes, reformatting, and revised numbering.	5.5	Facility Operating License 2.C(4), 1.0.T, 4.0.E, 4.7.B.1.a, 4.7.B.1.b, 4.7.B.1.c, 4.11.A.1, 4.11.A.2, 6.10.(B).6, Table 6.10-1, 6.17, 6.19, 6.20, 6.21, 6.22, RETS 1.0.H, RETS 2.5
A2	The CTS programmatic requirements for the Offsite Dose Calculation Manual (ODCM) have been editorially revised in the ITS.	5.5.1	6.17
A3	Not used.	N/A	N/A
A4	Not used.	N/A	N/A
A5	CTS 6.20.D, which states that Specification 4.0.B is not applicable to the Primary Containment Leakage Rate Testing Program is not retained in the ITS since ITS Section 3.0/4.0 do not apply to the Administrative Controls Section unless otherwise stated. In addition, for clarity, the ITS includes a reference to the prohibition of the modification of the testing Frequencies required by 10 CFR 50, Appendix J.	5.5.6.e	6.20.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A6	ITS 5.5.4, "Radioactive Effluent Controls Program" has been added. ITS 5.5.4 establishes programmatic controls to ensure compliance with applicable regulatory requirements. The program captures the existing requirements for control of radioactive effluents contained in the CTS Radiological Environmental Technical Specifications (RETS), which are proposed to be removed and relocated, consistent with Generic Letter 89-01, to the ODCM (see RETS DOCs).	5.5.4	N/A
A7	The CTS requires that inservice testing (IST) of pumps and valves be performed in accordance with Section XI of the ASME Code and applicable Addenda as required by 10 CFR 50.55a, except where relief has been requested. It further requires that the program be based on an NRC approved edition of the Code, and that performance of IST activities is in addition to other specified SRs. These requirements are adequately addressed in 10 CFR 50.54, 10 CFR 50.55a, and the ASME Code, and need not be repeated in the ITS.	N/A	4.0.E.1, 4.0.E.4
A8	The ITS includes a programmatic description of ITS Specification 5.5.7, "Inservice Testing Program." This program captures the existing requirements for inservice testing of certain ASME Code Class 1, 2, and 3 pumps and valves as required for plants licensed prior to January 1, 1971, which are contained throughout the CTS in various SRs. These individual Surveillances are appropriately addressed to reflect this change.	5.5.7	N/A
A9	The CTS requirement that specifies the inservice testing activities required by the Code and applicable Addenda shall be applicable as defined in Technical Specification 1.0.T, has been deleted, since CTS 1.0.T has been deleted. The ITS maintains only those Surveillance Frequencies consistent with the terminology and Frequency used in the ASME Boiler and Pressure Vessel Code and applicable to the IST Program.	5.5.7.a	4.0.E.2, 1.0.T

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A10	RETS 2.5, Maximum Activity in Outside Tanks, requirement has been placed in ITS 5.5.9, Explosive Gas and Storage Tank Radioactivity Monitoring Program. As such, CTS 6.22 has been supplemented in the ITS with a general program statement that addresses storage tank radioactivity monitoring to ensure appropriate controls of these requirements are maintained. In addition, CTS RETS 2.5 contains descriptive programmatic "Objective" statements concerning the maximum quantity of radioactivity allowed in outdoor storage tanks that do not have catch basins. This objective is stated in terms of limiting the quantity of radioactivity to ensure that in the event of uncontrolled release of the contents of tanks, that certain specified limits of 10 CFR 20 would not be exceeded. CTS RETS 2.5 also contains "Specifications" which address the maximum quantity of radioactive material allowed (10 curies, excluding Tritium and dissolved or entrained noble gases) and specifies surveillance to verify that the applicable tanks' contents are within the 10 curie limit as a means of achieving the specified objective 10 CFR 20 limits. Instead of specifying the curie limit for radioactivity in CTS RETS 2.5, the proposed ITS 5.5.9.b limits the allowed quantity of radioactivity contained in outdoor liquid storage tanks by addressing the maximum effluent concentration (excluding Tritium and dissolved or entrained noble gases) at the nearest potable water and surface water supplies beyond the site boundary in the event of uncontrolled release of the contents of the tanks. In ITS 5.5.9.b these effluent concentration limits are expressed as 10 times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001—20.2402.	5.5.9.b	6.22, RETS 2.5
A11	The CTS programmatic requirements for the Configuration Risk Management Program (CRMP) have been editorially changed for consistency with new ITS terminology.	5.5.13	6.21
A12	The CTS includes Surveillance Requirements (SRs) on the SGT and CREVAS Systems filter trains. CTS 4.0.B and 4.0.C currently apply to these SRs. In the ITS, these SRs are in the Administrative Controls Chapter. Since ITS SR 3.0.2 and 3.0.3 do not apply to the Administrative Controls Chapter of the ITS unless otherwise stated, the ITS includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to clarify that the allowances for Surveillance Frequency extensions do apply.	5.5.8	4.7.B, 4.11.A
A13	The ITS is clarified such that the term "following painting, fire, or chemical release that could adversely affect the ability of the charcoal to perform its intended function," refers to the charcoal filter system.	5.5.8	4.7.B.1.c, 4.11.A.2
5.6, REPORTING REQUIREMENTS			
A1	Editorial changes, reformatting, and revised numbering.	5.6	6.9, RETS 7.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A2	CTS 6.9.A, "Routine Reports," requires that, "The following reports shall be submitted in accordance with 10 CFR 50 unless otherwise noted." The ITS requires that, "The following reports shall be submitted in accordance with 10 CFR 50.4." This change provides a more specific citation of the regulation involved.	5.6	6.9.A
A3	The Occupational Radiation Exposure Report is editorially modified.	5.6.1	6.9.A.2, RETS 7.3.c
A4	The RETS provides a narrative description of the material required to be included in the Radioactive Effluent Release Report and the Annual Radiological Environmental Operating Report. The ITS requires that the material provided in the reports be consistent with the objectives of the ODCM, the PCP, and with 10 CFR 50.36a and 10 CFR 50, Appendix I. In making this change, many of the details provided in the RETS are not retained in the ITS, since they are already covered within the cited programs and regulations.	5.6.2, 5.6.3	RETS 7.3.c, RETS 7.3.d
A5	RETS 7.3.a and 7.3.b are not retained in the ITS since these Specifications only cross reference other specifications.	N/A	RETS 7.3.a, RETS 7.3.b
A6	The CTS requires that a report of the results of the first five years of performance of the non-destructive inspections listed in CTS Table 4.6-1 of CTS 4.6.F, Structural Integrity, be submitted to the NRC within three months of the completion of the fifth year of the program. This Specification is not retained in the ITS since the inspection activities have been performed with satisfactory results, and the report submitted to the NRC.	N/A	6.9.B.1
A7	The CTS reference to the MCPR low flow adjustment factor K_f has been deleted. It is not necessary to identify this particular function since the process of determining the MCPR in the COLR includes the requirement to multiply the MCPR by the appropriate K_f.	N/A	6.9.A.4.a
A8	The CTS reference to flow biased APRM rod blocks has been deleted since this function is not in the ITS.	N/A	6.9.A.4.a
A9	ITS 5.6.6 has been added. This new Specification requires a special report to be submitted for Post Accident Monitoring Instrumentation when Required Actions and associated Completion Times cannot be met or more than one channel is inoperable for specific instrumentation. Since the report is referenced in Actions B and F of ITS 3.3.3.1, Post Accident Monitoring Instrumentation, the change is considered administrative.	5.6.6	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A10	The CTS details concerning distribution of the COLR are being deleted since the details are a duplication of the document distribution requirements of 10 CFR 50.4.	N/A	6.9.A.4.d
A11	The CTS details regarding the revision number and date of the topical reports used to determine the core operating limits are being deleted since the complete identification of the topical reports used to prepare the COLR are to be identified in the COLR.	N/A	6.9.A.4.b
	5.7, HIGH RADIATION AREA		
A1	Editorial changes, reformatting, and revised numbering.	5.7	6.11, 6.11(A)
	CTS 6.0, ADMINISTRATIVE CONTROLS		
A1	CTS 6.6.A contains requirements regarding notification and submittal of reports to the NRC pursuant to the requirements of 10 CFR 50.73. These reporting requirements are specified within the cited regulations and need not be repeated in the ITS.	N/A	6.6.A
A2	CTS 6.12 requires that an industrial security program be maintained throughout the life of the plant in accordance with the provisions of the Plant Security Plan. Security requirements are adequately addressed in 10 CFR 73.55, and need not be repeated in the ITS.	N/A	6.12
A3	CTS 6.15 requires that by June 30, 1982, all safety-related electrical equipment be environmentally qualified in accordance with the Division of Operating Reactors (DOR) Guidelines or NUREG-0588. It further requires that complete and auditable environmental qualification records be available and maintained at a central location by December 1, 1980. These requirements have been satisfactorily met. Environmental qualification requirements are adequately addressed in 10 CFR 50.49, and need not be repeated in the ITS.	N/A	6.15
A4	The following intentionally blank CTS pages have been deleted: 254e, 254f, 257, 259, 260, and 262 through 284.	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
RETS 2.1, LIQUID EFFLUENT MONITORS			
NONE	NONE	NONE	NONE
RETS 2.2, CONCENTRATION OF LIQUID EFFLUENTS			
NONE	NONE	NONE	NONE
RETS 2.3, DOSE FROM LIQUID EFFLUENTS			
NONE	NONE	NONE	NONE
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS			
NONE	NONE	NONE	NONE
RETS 3.1, GASEOUS EFFLUENT MONITORS			
NONE	NONE	NONE	NONE
RETS 3.2, GASEOUS DOSE RATES			
NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM			
NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM			
NONE	NONE	NONE	NONE
RETS 5.0, TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLE			
NONE	NONE	NONE	NONE
RETS 6.1, MONITORING PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.2, LAND USE CENSUS PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM			

ATTACHMENT 3

Table M - More Restrictive Changes Matrix

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The status of the reactor vessel head closure bolts (all fully tensioned or one or more not fully tensioned) has been added to the CTS definitions of Cold Condition, Refuel Mode, Hot Shutdown and Cold Shutdown. The added head closure status in the CTS definitions addresses plant conditions satisfying more than one MODE. The intent of this change is to provide clarity and completeness in avoiding any potential misinterpretation.	Table 1.1-1	1.0.C, 1.0.I.1, 1.0.I.3.a, 1.0.I.3.b
M2	Deleted the CTS Hot Standby definition limitations on reactor coolant temperature and pressure. The ITS definition will not restrict MODE 2 to only when temperature is above 212°F or reactor pressure is less than 1040 psig.	Table 1.1-1	1.0.D
M3	ITS Section 1.3 describes Completion Times in order to direct the ITS user on how to correctly apply Completion Times in the ITS. One specific requirement in Section 1.3 describes the use of Completion Times for the case in which two subsystems become inoperable concurrently without a note which allows the Conditions to be entered separately. In this case, if one subsystem were restored (within the Completion Time for two subsystems inoperable), the shorter of 24 hours or the remainder of the subsystem's completion time (for one subsystem inoperable) is allowed to restore the other subsystem to OPERABLE status. Currently, depending on the situation, JAFNPP may take the remainder of the Completion Time of the subsystem which is inoperable even if this time is greater than 24 hours. Thus, the addition of this more restrictive requirement of Section 1.3.	1.3	N/A
M4	CTS defines "Reactor Power Operation" to be any operation with the Reactor Mode Switch in the Startup/Hot Standby or Run position with the reactor critical and above 1% rated thermal power. In addition, CTS 1.0.I and 1.0.I.2 define the Run Mode to be when the Reactor Mode Switch is in the Run position and reactor system pressure is at or above 850 psig. In the ITS, these explicit definitions are not retained, however; the CTS LCOs which currently reference these Modes will use the terms MODE 1 (Reactor Mode Switch in Run) and MODE 2 (Reactor Mode Switch in Startup/Hot Standby) as reflected in ITS Table 1.1-1. Since the requirement that the reactor must be critical and above 1% rated thermal power has been deleted, and since the pressure limitation has been removed for the Run Mode Applicability, this change is considered more restrictive on plant operations since the CTS LCOs which currently reference these definitions will be applicable even if the reactor is not critical, even if thermal power is at or below 1% rated thermal power, and even if reactor pressure is below 850 psig.	Table 1.1-1	1.0.O, 1.0.I, 1.0.I.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The Applicability for the Reactor Water Level Safety Limit has been changed from when the reactor is in the shutdown condition to all Modes.	2.1.1.3	1.1.D
M2	A new requirement has been added if a safety limit is not met. This new requirement will stipulate that "compliance with all SLs" be restored within 2 hours. In addition, a 2 hour time limit is being added to "insert all insertable control rods" if a safety limit is exceeded.	2.2.1, 2.2.2	6.7, 6.7.(A)

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires the unit be placed in COLD SHUTDOWN (MODE 4) within 24 hours if the LCO or action requirements cannot be satisfied because of circumstances in excess of those addressed in the Specifications. The ITS requires that the plant take action within 1 hour to initiate the shutdown, be in MODE 2 in 7 hours, be in MODE 3 in 13 hours, and be in MODE 4 in 37 hours. Since this change requires the plant to take action within 1 hour and to be at interim conditions, MODE 2 in 7 hours and MODE 3 in 13 hours, this portion of the change is more restrictive.	LCO 3.0.3	3.0.C
M2	The CTS does not address Frequencies specified as once. The ITS includes the phrase "For Frequencies specified as "once," the above interval extension does not apply." This is because the interval extension concept is based on scheduling flexibility for repetitive performance and these Surveillances are not repetitive in nature and essentially have no interval as measured from the previous performance. This change precludes the ability to extend these performances.	SR 3.0.2	4.0.B

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
M1	The CTS requires inoperable control rods to be positioned so that CTS 3.3.A.1 (ITS LCO 3.1.1) is met. No specific time limit is provided. If SDM is not met while the plant is in MODE 1 or 2, the ITS Actions will require the SDM to be restored in 6 hours or be in MODE 3 in the following 12 hours. If SDM is not met in MODE 4 or 5, the ITS Actions require action to be initiated immediately to insert all insertable control rods (in the core cells containing fuel if in MODE 5), to immediately suspend CORE ALTERATIONS (if applicable), and to initiate actions within 1 hour to restore secondary containment, SGT System and the Secondary Containment Isolation Valves (SCIVs) to Operable status.	3.1.1 ACTIONS A, B, C, D, and E	3.3.A.2.e
M2	The CTS requires that SDM be verified following a refueling outage. The ITS requires SDM to be verified once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement and prior to each in vessel fuel movement during the fuel loading sequence. Therefore, a finite time (4 hours after criticality) is now provided to verify SDM following a refueling outage. In addition, a new Surveillance Frequency for SDM verification has been added to clarify the requirements necessary for assuring SDM during the refueling process.	SR 3.1.1.1	4.3.A.1
	3.1.2, REACTIVITY ANOMALIES		
M1	The CTS Applicability has been expanded from during "power operation" to "MODES 1 and 2."	3.1.2	3.3.D
M2	The CTS requirement that the plant be placed in cold shutdown within 24 hours if the Reactivity Anomaly requirements are not met, is being deleted (see DOC L2). The ITS will require the plant to be in MODE 3 (i.e., outside the Applicability requirements) within 12 hours if the Required Action and associated Completion Time of Condition A are not met.	3.1.2 Required Action B.1	3.3.E
M3	The CTS requires a comparison of the critical rod configurations to the expected configuration during startup following refuel outages. ITS SR 3.1.2.1 requires a verification that the core reactivity difference between the measured rod density and the predicted rod density is within $\pm$ 1% $\Delta k/k$ once within 24 hours after reaching equilibrium conditions following startup after fuel movement within the reactor pressure vessel or control rod replacement (1st frequency). This change is more restrictive since the proposed surveillance is explicit on the Frequency (24 hours after reaching equilibrium conditions) and provides an additional condition for performing the surveillance (control rod replacement).	SR 3.1.2.1	4.3.D

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.3, CONTROL ROD OPERABILITY		
M1	The CTS requires an inoperable control rod or an uncoupled control rod to be disarmed, but does not provide a finite time to complete the action, nor does it require the control rods to be inserted prior to disarming. In addition, the CTS allows a control rod inoperable due to a scram time greater than 7 seconds to not be disarmed, provided it can be inserted. The ITS requires that if a rod is considered inoperable for any reason (including excessive scram time), it must be fully inserted within 3 hours (unless it is stuck) and disarmed within 4 hours.	3.1.3 Required Actions C.1 and C.2	3.3.A.2.b, 3.3.A.2.c, 3.3.B.1
M2	The CTS allows the plant to restart and continue operation with multiple stuck control rods if: 1) collet housing failure is eliminated as a potential cause; 2) sufficient control rods remain operable to make the core subcritical with the most reactive rod fully withdrawn (i.e., SDM is maintained); and 3) the stuck rod is disarmed. The ITS will require Hot Shutdown (MODE 3) within 12 hours when more than one control rod is stuck but not fully inserted, regardless of the reasons for the stuck control rods.	3.1.3 Required Action B.1	3.3.A.2.a
M3	The CTS requires that control rods be "exercised one notch," which could be met by withdrawing the control rod one notch. The ITS requires control rods to be "inserted" at least one notch, in lieu of the existing requirement for "exercising."	SR 3.1.3.2, SR 3.1.3.3	4.3.A.2.a
M4	The control rod exercise Surveillance initial condition "when operating above 30 percent power" is changed to "THERMAL POWER is greater than the LPSP of the RWM." Since the LPSP is set well below the 30% RTP level (the RWM must be operable equal to and less than 10% RTP), this change is more restrictive than present requirements but does not impose any safety concerns since at power levels above the LPSP notch insertions will not impact the requirements of the Banked Position Withdrawal Sequence.	3.1.3 Required Action A.3 Completion Time, SR 3.1.3.2 and SR 3.1.3.3 Notes	4.3.A.2.a
M5	The CTS requires that inoperable (and stuck) control rods be positioned such that SDM requirements are maintained. The CTS also requires the reactor to be in Cold Shutdown within 24 hours (see DOC L6) when a control rod is first found to be stuck. The ITS 3.1.3 includes additional requirements that: a) with one stuck rod, SDM be verified within 72 hours; b) with more than one stuck rod, the reactor be in Hot Shutdown within 12 hours; and c) with one or more inoperable control rods, each inoperable control rod must be inserted. In addition, if the first or third requirement listed above cannot be met the reactor must be placed in MODE 3 in 12 hours.	3.1.3 Required Actions A.4, B.1, C.1, and E.1	3.3.A.2.e

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	The CTS specifies a maximum scram time, but does not include an explicit Surveillance with an appropriate Frequency that verifies the maximum scram time. The ITS includes a Surveillance with an appropriate Frequency (in accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4).	SR 3.1.3.4	3.3.C.3
	3.1.4, CONTROL ROD SCRAM TIMES		
M1	The CTS gives the Applicability of minimum scram times as "in the reactor power operation condition," which is defined as greater than 1% RTP. The ITS has minimum scram times limits applicable during MODES 1 and 2.	3.1.4 Applicability	3.3.C.1
M2	Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 10, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds.	LCO 3.1.4, Table 3.1.4-1	3.3.C
M3	An additional Surveillance is added to perform scram time tests on all control rods prior to exceeding 40% RTP after each reactor shutdown ≥ 120 days.	SR 3.1.4.1	N/A
M4	Two Surveillance Requirements are added requiring a scram time test after work on a control rod or CRD that could affect the scram time (SRs 3.1.4.3 and 3.1.4.4 2nd Frequency) and after fuel movement within affected core cells (SR 3.1.4.4 1st Frequency). SR 3.1.4.3 will require a scram time test, which may be done at any pressure, prior to declaring a control rod Operable (and thus, enabling its withdrawal during a startup). SR 3.1.4.4 will require a scram time test after reactor pressure has reached ≥ 800 psig and prior to exceeding 40% RTP. To allow testing at less than normal operating pressures, a requirement for scram time limits at < 800 psig (any reactor steam dome pressure) is included. ITS 3.1.4-1 Note (b) indicates that the scram times as a function of reactor steam dome pressure must be within established limits when reactor steam dome pressure is < 800 psig.	SR 3.1.4.3, SR 3.1.4.4, Table 3.1.4-1 Note (b)	N/A
M5	The CTS requirement to place the plant in the cold shutdown condition within 24 hours if the scram time limits are not met has been changed in the ITS to require the plant to be in MODE 3 within 12 hours.	3.1.4 Required Action A.1	3.3.E

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	Changes the pressure at which the control rods must be tested from > 950 to ≥ 800 psig, corresponding to the limiting pressure for CRD scram testing for the FitzPatrick CRD System.	SR 3.1.4.2, SR 3.1.4.4	4.3.C.1, 4.3.C.2
3.1.5, CONTROL ROD SCRAM ACCUMULATORS			
M1	The CTS requires a check of the status of the pressure and level alarms for each control rod scram accumulator once per week. The ITS adds the acceptance criteria for accumulator pressure (≥ 940 psig).	SR 3.1.5.1	4.3.A.2.c
3.1.6, ROD PATTERN CONTROL			
M1	The CTS requires the control rod patterns to be equivalent to those prescribed by the BPWS "if the reactor is in the run or startup mode at less than 10% rated thermal power". The ITS Applicability requires that Operable control rods comply with the requirements of BPWS in "MODES 1 and 2 with THERMAL POWER ≤ 10% RTP". Thus the new Applicability requires the control rod pattern to comply with BPWS at 10% RTP, whereas the CTS does not.	3.1.6 Applicability	3.3.B.3.f
M2	The ITS adds an SR to verify all Operable control rods comply with BPWS every 24 hours.	SR 3.1.6.1	N/A
3.1.7, STANDBY LIQUID CONTROL SYSTEM			
M1	The CTS requires the verification that all valves (manual, power operated, or automatic) in the system flowpath that is not locked, sealed or otherwise secured in position is in the correct position. There are no power operated or automatic valves in the system except for the explosive valves. This Surveillance is included as ITS SR 3.1.7.6 for all manual valves, and a new requirement has been added to verify the continuity of each explosive charge.	SR 3.1.7.4, SR 3.1.7.6	4.4.A.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS requires verification that heat traced piping between the SLC storage tank and the pump suction is unblocked (by manually initiating the system, except explosive valves, and pump boron solution from the SLC storage tank through the recirculation path) once every 24 months. The ITS requires verification that heat traced piping between the SLC storage tank and the pump suction is unblocked once per 24 months and includes an additional Frequency of "Once within 24 hours after piping temperature is restored within the limits of Figure 3.1.7-2."	SR 3.1.7.9	4.4.A.3
M3	The CTS has requirements for checking the concentration of sodium pentaborate in the SLC Tank after certain events which could affect boron concentration occur (adding water to tank, adding boron to tank, or if temperature of solution in tank drops below the temperature limit). The CTS does not specify any time requirement for performing these checks. The ITS adds a time limit of 24 hours into the requirement to check sodium pentaborate concentration after additions to the SLC Tank are made (water or sodium pentaborate). The ITS also adds a second time requirement to check the concentration within 24 hours after solution temperature is restored within limits.	SR 3.1.7.5	4.4.C.1
M4	The CTS requires that the enrichment of the Boron-10 (in the SLC tank) be checked once per 24 months, but the CTS contains no requirement for checking the Boron-10 enrichment of sodium pentaborate being added to the tank. In addition to the above requirement, the ITS will also require that a Boron-10 enrichment verification be done prior to adding sodium pentaborate to the tank. Since the enrichment of a batch/lot of sodium pentaborate will not change with time, a single isotopic test of any given batch/lot can suffice as the required analysis for any number of mixings and additions from that batch/lot.	SR 3.1.7.10, SR 3.1.7.11	4.4.C.4
M5	The CTS requires the firing of SLC primer assemblies prior to being installed into the plant, but does not require firing of the primer assemblies during the flow test. The ITS will require the firing of an installed primer assembly as part of the SLC flow test to ensure the primer assembly opens the associated SLC valve.	SR 3.1.7.8	4.4.A.4, 4.4.A.5
3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE		
M1	The CTS requires that APLHGR be determined "daily during reactor operation at ≥ 25% rated thermal power." The ITS Frequency is "within 12 hours after ≥ 25% RTP AND 24 hours thereafter". This change requires the first APLHGR determination within 12 hours while the current specification requires the same determination be made within 24 hours after RTP ≥ 25% RTP.	SR 3.2.1.1	4.5.H
	3.2.2, MINIMUM CRITICAL POWER RATIO		
M1	The CTS requires that MCPR be determined "daily during reactor operation at ≥ 25% rated thermal power." The ITS Frequency is "within 12 hours after ≥ 25% RTP AND 24 hours thereafter". This change requires the first MCPR determination within 12 hours while the current specification requires the same determination be made within 24 hours after RTP ≥ 25% RTP.	SR 3.2.2.1	4.1.C
M2	The CTS requires the verification of the MCPR operating limits to be performed as specified in the Core Operating Limits Report. The ITS specifies the MCPR limits must be determined within 72 hours after each completion of ITS SR 3.1.4.1, SR 3.1.4.2 and SR 3.1.4.4 (control rod scram time testing). This new requirement is similar to current practice as specified in the COLR but imposes more specific Surveillance Frequencies.	SR 3.2.2.2	4.1.D
	3.2.3, LINEAR HEAT GENERATION RATE		
M1	The CTS requires that LHGR be determined "daily during reactor operation at ≥ 25% rated thermal power." The ITS Frequency is "within 12 hours after ≥ 25% RTP AND 24 hours thereafter". This change requires the first LHGR determination within 12 hours while the current specification requires the same determination be made within 24 hours after RTP ≥ 25% RTP.	SR 3.2.3.1	4.5.I
	3.2.4, APRM GAIN AND SETPOINT		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires that MFLPD be determined "daily during reactor power operation at ≥ 25% rated thermal power". The ITS Frequency is "within 12 hours after ≥ 25% RTP AND 24 hours thereafter". In addition, the CTS for MFLPD also has requirements to adjust APRM setpoints if necessary in accordance with the COLR with the same Frequency as the MFLPD determination. The ITS establishes a specific Frequency of every 12 hours. These changes require the first MFLPD determination within 12 hours while the current specification requires the same determination be made within 24 hours after RTP ≥ 25% RTP, and the APRM setpoint adjustment is required at a 12 hour Frequency and not the 24 hour Frequency presently permitted.	SR 3.2.4.1, SR 3.2.4.2	4.1.B

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS INSTRUMENTATION		
M1	The CTS allows the Scram Discharge Volume High Function to be bypassed when the mode switch is in refuel or shutdown. The ITS requires this Function to be OPERABLE in MODE 5 whenever any control rod is withdrawn from a core cell containing one or more fuel assembles.	Table 3.3.1.1-1 Function 7 footnote (a)	Table 3.1-1 Note 4
M2	The CTS requires 3 channels of Scram Discharge Volume High Water Level to be OPERABLE in each Trip System. In the ITS, the Scram Discharge Water Level Function has been divided into two Functions, the Scram Discharge Instrument Volume Water Level - Differential Pressure Transmitter/Trip Unit and -Level Switch, each which require 2 channels to be OPERABLE in each Trip System (for a total of 4 channels per trip system for these Functions).	Table 3.3.1.1-1 Functions 7.a and 7.b	Table 3.1-1 Trip Function 12
M3	The CTS requires 4 channels of Main Steam Line Isolation Valve Closure to be OPERABLE in each Trip System. In the ITS, 8 channels are required to be OPERABLE in each Trip System.	Table 3.3.1.1-1 Function 5	Table 3.1-1 Trip Function 13
M4	The ITS includes a new Surveillance Requirement to perform Logic System Functional Tests every 24 months for the following Functions: a) IRM Neutron Flux — High (MODE 2 and MODE 5(a)); b) IRM Inop (MODE 2 and MODE 5(a)): c) APRM Neutron Flux — High (Startup) (MODE 2); d) APRM Neutron Flux — High (Flow Biased): e) APRM Neutron Flux — High (Fixed); f) APRM Inop (MODE 1 and MODE 2); g) Reactor Pressure — High; h) Reactor Vessel Water Level — Low (Level 3); i) Main Steam Isolation Valve — Closure; j) Drywell Pressure — High; k) SDV Water Level — High (MODE 1, MODE 2, and MODE 5(a)); l) Turbine Stop Valve — Closure; m) Turbine Control Valve Fast Closure, EHC Trip Oil Pressure-Low; n) Reactor Mode Switch — Shutdown Position (MODE 1, MODE 2, and MODE 5(a)); and o) Manual Scram (MODE 1, MODE 2, and MODE 5(a)).	SR 3.3.1.1.13	N/A
M5	The ITS includes a new Surveillance Requirement to perform Channel Checks every 12 hours for the Functions listed below: a) IRM Neutron Flux — High (MODE 2 and MODE 5(a)); b) APRM Neutron Flux — High (Startup) (MODE 2); c) APRM Neutron Flux — High (Fixed) (MODE 1); and d) APRM Neutron Flux — High (Flow Biased) (MODE 1).	SR 3.3.1.1.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	The CTS Channel Check Frequency is increased from daily to every 12 hours in the ITS for the following Functions: a) Reactor Pressure — High; b) Drywell Pressure — High; c) Reactor Vessel Water Level — Low (Level 3); d) Scram Discharge Volume Water Level-High (DP transmitter/trip unit); and e) Turbine First Stage Pressure Permissive.	SR 3.3.1.1.1	Table 4.1-1 Channel Check Frequency
M7	A new Surveillance Requirement has been added to verify SRM and IRM channels overlap prior to fully withdrawing SRMs.	SR 3.3.1.1.5	N/A
M8	The CTS specifies that the response time of the reactor protection system trip functions listed shall be demonstrated to be within its limit once per 24 months. Each test shall include at least one channel in each trip system. All channels in both trip systems shall be tested within two test intervals. In the ITS, the RPS RESPONSE TIME test must be performed every 24 months on a STAGGERED TEST BASIS. In addition, a Note to this SR specifies that "n" equals 2 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. Therefore, the ITS will require all channels requiring response time testing to be tested in two (2) surveillance intervals. This change is more restrictive since at least eight (8) ITS 3.3.1.1 Function 5 (Main Steam Isolation Valve — Closure) channels and four (4) ITS 3.3.1.1 Function 8 (Turbine Stop Valve — Closure) channels must be tested each interval instead of one channel in each trip system required by the CTS.	SR 3.3.1.1.15	4.1.A
M9	Not used	N/A	N/A
M10	The CTS requires a heat balance for APRM High Flux Output Signal calibration; however, no acceptance criteria is provided. The ITS requires that the absolute difference between the APRM channels and the calculated power be ≤ 2% RTP plus any gain adjustment required by LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint" while operating at ≥ 25% RTP.	SR 3.3.1.1.2	Table 4.1-2 Calibration Frequency for Instrument Channel 2
M11	Not used	N/A	N/A
M12	The CTS requires actuation of the MSIV Closure limit switches and Turbine Stop Valve Closure pressure switches by normal means every 24 months. The ITS requires an actual Channel Calibration of these instruments every 24 months to ensure channel OPERABILITY.	SR 3.3.1.1.12	Table 4.1-2 Note 4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M13	A new Surveillance Requirement has been added to verify, every 24 months, the Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, EHC Oil Pressure — Low Functions are not bypassed when THERMAL POWER is ≥ 29 % RTP.	SR 3.3.1.1.14	N/A
M14	The CTS requires a comparison of the IRM channels with the APRM channels on a controlled shutdown. However, the requirement is only associated with the IRM High Flux Function. In the ITS, this Surveillance is associated with not only the IRM Neutron Flux-High, but also the APRM Neutron Flux-High (Startup). In addition, a Note is included in the ITS that states the SR is only required to be met during entry into MODE 2 from MODE 1 since this is when the IRM and APRM channels are designed to overlap with one another. Currently, the Surveillance implies that the calibration is to be performed on controlled shutdowns only.	SR 3.3.1.1.6	Table 4.1-2 Calibration Frequency for Instrument Channel 1
M15	The CTS actions for the APRM Inoperative Function provides an option of either inserting all Operable rods within 4 hours (being in MODE 3), or reducing power to the IRM range and placing the reactor mode selector switch in startup (being in MODE 2) within 8 hours if the APRM Inoperative Function has less than the minimum number of Operable channels per trip system. The ITS requires entry into MODE 3 since the APRM Inoperative Function is required in MODES 1 and 2.	3.3.1.1 ACTION G	Table 3.1-1 Notes 3.A and 3.B
M16	Not used.	N/A	N/A
M17	The CTS requires the plant to be in Startup within 8 hours when CTS Table 3.3-1 Notes 1 and 2 (as applicable) are not met for inoperable APRM Flow Referenced Neutron Flux or APRM Fixed High Neutron Flux High channels. The ITS will require the plant to be in MODE 2 within 6 hours, a decrease of 2 hours.	3.3.1.1 Action F	Table 3.3-1 Note 3.B
3.3.1.2, SRM INSTRUMENTATION			
M1	The CTS require two Source Range Monitors (SRMs) to be Operable whenever control rods are withdrawn for startup. The ITS will require three SRMs to be Operable at all times in MODE 2 until the flux level is sufficient to maintain the Intermediate Range Monitor on Range 3 or above.	Table 3.3.1.2-1 Function 1, including footnote (a)	3.3.B4 4.3.B.4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	A new requirement is being added to require 2 SRM channels to be Operable at all times in MODE 3 and MODE 4 because the SRMs are the primary indication of neutron flux levels in these MODES. In addition, an appropriate ACTION and Surveillance Requirements have also been added.	Table 3.3.1.2-1, 3.3.1.2 ACTION D, SR 3.3.1.2.3, SR 3.3.1.2.4, SR 3.3.1.3.6, SR 3.3.1.2.7	N/A
M3	The CTS requires a count rate verification "prior to control rod withdrawal for startup or during refueling." The CTS also requires a count rate verification "prior to making alterations to the core" and daily thereafter. The ITS will requires periodic verification of the SRM count rate at least once per 24 hours while in MODE 2 when IRMs are on Range 2 or below and every 12 hours during CORE ALTERATIONS.	SR 3.3.1.2.4	4.3.B.4, 4.10.B
M4	Two new MODE 2 (when IRMs are on Range 2 or below) Surveillance Requirements are being added. The new Surveillances will require a) performance of an SRM Channel Check every 12 hours; and b) performance of an SRM Channel Functional Test and determination of signal to noise ratios every 31 days. In addition, the Channel Functional Test Surveillance is modified by a Note that will allow deferral of this Surveillance until 12 hours after the IRMs are on Range 2 or below when the reactor is being shutdown.	SR 3.3.1.2.1, SR 3.3.1.2.6	N/A
M5	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required SRM is inoperable. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.3.1.2 Required Action C.1	N/A
M6	A new Surveillance Requirement is being added to verify every 12 hours during CORE ALTERATIONS that the SRMs are properly located.	SR 3.3.1.2.2	N/A
M7	A new Surveillance Requirement is being added to state that the 3 cps count rate requirement is based on a signal to noise ratio of $\geq$ 2:1. Currently, the CTS just list the count rate requirement but does not specify what signal to noise ratio it is based upon.	SR 3.3.1.2.4	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M8	The CTS does not specify any Required Actions if SRM Operability requirements in MODE 5 are not satisfied. The ITS includes Required Actions if less than the required number of SRMs are Operable in MODE 5. If one or more required SRMs are inoperable when in MODE 5, the ITS will require that CORE ALTERATIONS be terminated and action be taken immediately to fully insert all control rods in core cells containing one or more fuel assemblies.	3.3.1.2 ACTION E	N/A
M9	A new MODE 5 Surveillance Requirement has been added to perform a Channel Calibration every 92 days. In addition, the Surveillance has been modified by a Note that excludes the neutron detectors from calibration requirements.	SR 3.3.1.2.7	4.10.B
M10	The CTS requires the SRMs to be functionally tested prior to making Core Alterations. The ITS requires a CHANNEL FUNCTIONAL TEST be performed every 7 days when in MODE 5, which includes Core Alterations. In addition, the ITS also requires the determination of the signal to noise ratio (as modified by the SR Note).	SR 3.3.1.2.5	4.10.B
M11	The CTS requires the SRMs to be checked for neutron response prior to Core Alterations and checked daily thereafter. The ITS requires the performance of a CHANNEL CHECK every 12 hours during MODE 5 (which includes Core Alterations).	SR 3.3.1.2.1	4.10.B
3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION			
M1	A new Function has been included in the ITS. 2 channels of the Rod Block Monitor-Inop Function are now required to be Operable consistent with the Applicability with the other Rod Block Monitor Functions. In addition, appropriate ACTIONS and Surveillance Requirement have also been added.	Table 3.3.2.1-1 Function 1.b, 3.3.2.1 ACTIONS A and B, SR 3.3.2.1.1, SR 3.3.2.1.4	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	A new Function has been included in the ITS. 2 channels of the Rod Block function of Reactor Mode Switch — Shutdown Position must be Operable whenever the Mode Switch is in the Shutdown position. In addition, an appropriate ACTION and a Surveillance Requirement have also been added.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7	N/A
M3	The CTS provides a restoration time of 7 days when one RBM channel is inoperable. The ITS will only allow 24 hours for the same condition.	3.3.2.1 Required Action A.1	Table 3.2-3 Note 2 Action B.a)
M4	A new Surveillance has been added to verify, every 92 days, that the RBM-Upscale and -Downscale Functions are not bypassed at Thermal Power ≥ 30% RTP and when a peripheral control rod is not selected.	SR 3.3.1.2.4	N/A
M5	A new Surveillance Requirement is being added to perform, every 92 days, a CHANNEL FUNCTIONAL TEST in MODE 1 when Thermal Power is ≤ 10% to ensure the RWM is Operable with the reactor mode switch in RUN.	SR 3.3.2.1.3	N/A
M6	A new Surveillance Requirement is being added to verify every 24 months that the Rod Worth Minimizer is not bypassed when Thermal Power is ≤ 10%.	SR 3.3.2.1.6	N/A
3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION			
None	None	None	None
3.3.3.1, PAM INSTRUMENTATION			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The required number of channels for all CTS PAM instrumentation Functions maintained in the ITS is being increased from 1 channel to 2 channels in the ITS. In addition, the CTS allows 30 days to restore the one required channel (i.e., both channels are inoperable, since only one of the two is required to be Operable). Under the same conditions (both required channels inoperable), the ITS will only allow 7 days to restore one of the channels. Also, the ITS limits the time one of the two required channels can be inoperable to 30 days, and if not restored, requires a special report to be submitted to the NRC.	Table 3.3.3.1-1 Functions 1 through 6 and 8 through 10 Required Channels, 3.3.3.1 ACTIONS A, B, and C	Table 3.2-8 Instruments 4 through 14 Minimum no. of Operable Channels Required, Table 3.2-8 Notes A and F
M2	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required PAM channel is not restored to Operable status with the allowed time. In the ITS, MODE 3 must be met within 12 hours.	3.3.3.1 Required Action E.1	Table 3.2-8 Note A
M3	A new PAM Function has been included in the ITS. 2 channels per penetration flow path of the Penetration Flow Path PCIV position Function are required to be Operable in MODES 1 and 2, except only one is required for those penetrations with only one installed control room indicator and none are required if the penetration flow path is properly isolated. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.3.3.1 Applicability, Table 3.3.3.1-1 Function 7, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.3	N/A
M4	A new PAM Function has been included in the ITS. 2 channels of the Drywell Water Level Function are required to be Operable in MODES 1 and 2. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.3.3.1 Applicability, Table 3.3.3.1-1 Function 11, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.3	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.3.2, REMOTE SHUTDOWN SYSTEM		
M1	The CTS Applicability is "Run and Startup/Hot Standby" modes. The CTS definition of Hot Standby includes operation with coolant temperature > 212 °F. In the ITS, the Applicability is MODES 1 and 2, which includes a control rod withdrawn (for the purposes of starting up) when < 212 °F.	3.3.3.2 Applicability	3.2.J
M2	The CTS provides an allowance that the requirements of CTS 3.2.J (the Remote Shutdown instrument and control circuit LCO) do not apply if the component actuated by a required control circuit is inoperable. This explicit allowance is not included in the ITS and is being deleted. If operating in MODES 1 and 2, all of the controls appearing in the ITS must be Operable to support equipment that has been tested in accordance with its associated Surveillance Requirements and is also considered Operable. If this is not the case, then the specified control will not be able to support the required safe shutdown safety functions defined in the Bases of ITS 3.3.3.2. If a component actuated by a required Remote Shutdown Circuit is inoperable and the other Technical Specifications allow continuous operation without this component (e.g., Safety/Relief Valves), then this component should be restored to Operable status within 30 days since the Remote Shutdown safe shutdown requirements may not be met. In most cases, the Completion Times of other Specifications (e.g., ITS 3.5.1, ECCS) will govern the allowed out of service time when required mechanical or electrical equipment are inoperable, since the times provided in the other Specifications are normally less than Remote Shutdown LCO Completion Times.	N/A	3.2.J.5
M3	With one or more required remote shutdown instrumentation circuits inoperable, the CTS provides an option to establish an alternate method of monitoring the parameter within 30 days and to restore the required instrument circuit to operable status within 90 days. With one or more required control circuits inoperable, the CTS provides an option to place the component actuated by that control circuit in the safe shutdown configuration. These options have not been included in the ITS; the restoration of the inoperable components is required.	N/A	3.2.J.2.b, 3.2.J.3.b
	3.3.4.1, ATWS-RPT INSTRUMENTATION		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS.	SR 3.3.4.1.1	Table 4.2-7 Channel Check Frequency
M2	The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A7) for the Reactor Pressure High Trip Function from ≤ 1155 psig to ≤ 1153 psig.	SR 3.3.4.1.4	Table 3.2-7 Trip Level Setting for the Reactor Pressure High Trip Function
M3	The ITS includes a Note that precludes placing a channel in trip to meet the required actions if the inoperable channel is the result of an inoperable breaker, since this would not adequately compensate for the inoperability.	3.3.4.1 Required Action A.2 Note	N/A
	3.3.5.1, ECCS INSTRUMENTATION		
M1	The CTS minimum number of Operable Channels for the Condensate Storage Tank Level - Low Trip Function has been increased from 2 channels to 4 channels in the ITS, since there are two condensate storage tanks, and each have 2 channels.	Table 3.3.5.1-1 Function 3.d	Table 3.2-2 Item No. 17
M2	Five new Functions have been included in the ITS: a) Core Spray Pump Discharge Flow — Low (Bypass); b) Core Spray Pump Discharge Pressure — High (Bypass); c) Low Pressure Coolant Injection Pump Discharge Flow — Low (Bypass); d) High Pressure Coolant Injection Pump Discharge Flow — Low (Bypass); and e) High Pressure Coolant Injection Pump Discharge Pressure — High (Bypass). In addition, and appropriate ACTION and Surveillance Requirements have also been added.	Table 3.3.5.1-1 Functions 1.e, 1.f, 2.g, 3.f, and 3.g, 3.3.5.1 ACTION E, SR 3.3.5.1.3, SR 3.3.5.1.5, SR 3.3.5.1.6	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for the reactor water level high and low, drywell pressure high, and reactor pressure low Instrument Channels.	SR 3.3.5.1.1 for Functions 1.a, 1.b, 1.c, 2.a, 2.b, 2.c, 2.d, 2.e, 3.a, 3.b, 3.c, 4.a, 4.c, 5.a, and 5.c	Table 4.2-2 Instrument Check Frequency for Instrument
M4	Not used.	N/A	N/A
M5	Not used.	N/A	N/A
M6	The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A12) for the Reactor Low Level (inside shroud) Trip Function from $\geq$ 0.0 inches to $\geq$ 1.0 inches.	Table 3.3.5.1-1 Function 2.e Allowable Value	Table 3.2-2 Item No. 5 Trip Level Setting
3.3.5.2, RCIC SYSTEM INSTRUMENTATION			
M1	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for the reactor water level high and low Instrument Channels.	SR 3.3.5.2.1 for Functions 1 and 2	Table 4.2-2 Instrument Check Frequency for Instrument Channel 1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	A new Function has been added. The ITS requires 1 channel of the RCIC Manual initiation Function to be Operable in MODE 1 and MODES 2 and 3 with reactor steam dome pressure > 150 psig. In addition, appropriate ACTIONS and a Surveillance Requirement have also been added.	3.3.5.2 Applicability, Table 3.3.5.2-1 Function 4, 3.3.5.2 ACTIONS C and E, SR 3.3.5.2.6	N/A
M3	The CTS minimum number of Operable Channels for the Condensate Storage Tank Level - Low Trip Function has been increased from 2 channels to 4 channels in the ITS, since there are two condensate storage tanks, and each have 2 channels.	Table 3.3.5.2-1 Function 3	Table 3.2-2 Item No. 16
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION			
M1	The CHANNEL FUNCTIONAL TEST Frequency is being increased from every 24 months (R) in the CTS to every 92 days in the ITS for the containment high range radiation monitor. In addition, a LOGIC SYSTEM FUNCTIONAL TEST 24 month Surveillance is also being added for this Function.	SR 3.3.6.1.2 and SR 3.3.6.1.7 for Table 3.3.6.1-1 Function 2.c	Table 4.2-8 Instrument Functional Test Frequency for Instrument 4
M2	The ITS includes a new Applicability of MODES 4 and 5 for the RHR SDC Reactor Vessel Water Level - Low Function. Also, the ITS includes a Note that only one trip system is required in MODES 4 and 5, provided the RHR SDC System integrity is maintained. In addition, an appropriate ACTION has also been added.	Table 3.3.6.1-1 Function 6.b (including Note e), 3.3.6.1 ACTION J	Table 3.2-1 Trip Function 1
M3	Not used.	N/A	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS specifies that the main steam isolation valve actuation instrumentation response time for the specified trip functions must be demonstrated to be within its limit once per 24 months. Each test shall include at least one channel in each trip system. All channels in both trip systems shall be tested within two test intervals. In the ITS, the ISOLATION INSTRUMENTATION RESPONSE TIME test must be performed every 24 months on a STAGGERED TEST BASIS. In addition, a Note to this SR specifies that "n" equals 2 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. Therefore, the ITS will require all channels requiring response time testing to be tested in 2 surveillance intervals. This change is more restrictive since 2 channels must be tested each interval for Functions 1.a and 1.b while 8 channels must be tested each interval for Function 1.c instead of one channel in each trip system required by the CTS.	SR 3.3.6.1.8	4.2.A
M5	Not used.	N/A	N/A
M6	The required number of OPERABLE channels in each trip system for HPCI and RCIC Steam Line Low Pressure and HPCI and RCIC Turbine High Exhaust Diaphragm Pressure Functions are increased from 1 in the CTS to 2 in the ITS.	Table 3.3.6.1-1 Functions 3.b, 4.b, 3.c, and 4.c	Table 3.2-1 Trip Functions 14, 15, 18, and 19
M7	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required instrumentation channel is not restored/tripped within the allowed times. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.3.6.1 Required Actions D.2.1 and H.1	Table 3.2-1 Note 3.A
M8	The Completion Time provided to close the affected isolation valves is decreased from 4 or 8 hours in the CTS to 1 hour in the ITS.	3.3.6.1 Required Action F.1	Table 3.2-1 Notes 3.C, 3.D, and 3.E
M9	The CHANNEL CHECK Frequency is being increased from daily in the CTS to every 12 hours in the ITS for various primary containment isolation instrument channels.	SR 3.3.6.1.1	Tables 4.1-1, 4.2-1, and 4.2-8

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M10	The required number of OPERABLE channels in each trip system for the containment high range radiation monitor Function are increased from 1 in the CTS to 2 in the ITS. In addition, the CTS allowed restoration time from the one channel has been changed from 30 days to 24 hours in the ITS. Also, since both channels are currently required to be Operable, an allowance is necessary to perform the associated Surveillances while in the applicable modes consistent with other Primary Containment Isolation Functions. Therefore, an ITS Note will delay entry into the associated Conditions and Required Action for 6 hours as long as isolation capability is maintained.	Table 3.3.6.1-1 Function 2.c, 3.3.6.1 ACTION A, Note 2 to Surveillance Requirements	Table 3.2-8 Instrument 4, including Note A
M11	A new Function has been added. The ITS requires 2 channels of the SLC System Initiation Function to be Operable in MODES 1 and 2. In addition, appropriate ACTIONS and a Surveillance Requirement have also been added.	Table 3.3.6.1-1 Function 5.d, including footnote d, 3.3.6.1 ACTIONS A, B, and I	N/A
M12	The CTS allowance to delay entry into the associated Limiting Conditions for Operation and required action for 6 hours during the performance of instrumentation surveillances when primary containment isolation valves are placed in an inoperable status has not been included in the ITS.	N/A	Table 3.2-1 Note 2
M13	The CTS Applicability of the primary containment isolation instrumentation is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the primary containment isolation instrumentation must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	Table 3.3.6.1-1	3.2.A, Table 3.2-1 Note 1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M14	The CTS Trip Level Setting (changed to Allowable Value as discussed in DOC A16) for the following Functions have been changed: HPCI Steam Line Low Pressure, Main Steam Line Leak Detection High Temperature, HPCI and RCIC Steam Line/Area Temperature, RWCU System Equipment Area Temperature, Reactor High Pressure (SDC), RCIC Turbine High Exhaust Diaphragm Pressure, RCIC Turbine Steam Line High Flow, HPCI Turbine High Exhaust Diaphragm Pressure, and RCIC Steam Line Low Pressure.	Table 3.3.6.1-1 Allowable Values for Functions 1.e, 3.b, 3.c, 3.d, 3.e, 3.f, 3.g, 3.h, 3.i, 3.j, 4.a, 4.b, 4.c, 4.d, 4.e, 4.f, 5.a, 5.b, 5.c, 5.d, and 6.a	Table 3.2-1 Trip Level Setting for Trip Functions 3, 10, 11, 14, 15, 16, 17, 18, 19, and 20
M15	CTS Table 3.2-1 Note 3.B requires the main steam lines to be isolated within 8 hours when CTS Table 3.2-1 Notes 1 and 2 (as applicable) are not met for inoperable Main Steam Line Low Pressure channels. However, the Main Steam Line Low Pressure channels are only required to be Operable in the Run Mode (MODE 1), as stated in CTS Table 3.2-1 Note 5. As stated in CTS 3.0.A, once the plant is placed in the Startup/Hot Standby Mode (MODE 2), the Main Steam Line Low Pressure channels are no longer required to be Operable; thus the requirement in CTS Table 3.2-1 Note 3.B to isolate the main steam lines is no longer required. Effectively, the CTS requires the plant to be placed in MODE 2 within 8 hours. The ITS provides an Action consistent with the Applicability of the Main Steam Low Pressure channels; it requires the plant to be placed in MODE 2. However, in lieu of the CTS time of 8 hours to complete this action, the ITS requires MODE 2 to be reached in 6 hours, a decrease of 2 hours.	3.3.6.1 Action E	Table 3.2-1 Note 3.B

3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	A new Applicability for the Reactor Vessel Water Level - Low, refuel area Exhaust Monitor, and Reactor Building Area Exhaust Monitor Functions is being added. These Functions are now required to be Operable during operations with a potential for draining the reactor vessel.	Table 3.3.6.2-1 Functions 1, 3, and 4	Table 3.2-1 Trip Function 1, RETS Table 3.10-1 Trip Functions 1 and 2
M2	The CTS requires the Trip Level Setting of the Refuel Area Exhaust Monitor and Reactor Building Area Exhaust Monitor Functions to be in accordance with the methods and procedures of the ODCM. In the ITS, the actual Allowable Values are provided, not a cross reference to the ODCM.	Table 3.3.6.2-1 Allowable Values for Functions 3 and 4	RETS Table 3.10-1 Trip Level Setting for Trip Functions 1 and 2
M3	The RETS requires the isolation of the secondary containment and to start the SGT System when the associated instrumentation is found to be inoperable; however, no finite completion time is provided. In the ITS a 1 hour completion time is provided to complete the actions.	3.3.6.2 Required Actions C.2.1 and C.2.2	RETS Table 3.10-1 Note (d)
M4	The CHANNEL CHECK Frequency is being increased from daily in the CTS/RETS to every 12 hours in the ITS for the secondary containment isolation instrument channels.	SR 3.3.6.2.1	Table 4.1-1, RETS Table 3.10-2
M5	A new Surveillance Requirement is added for the Refuel Area Exhaust Monitor. The ITS requires performance of a Logic System Functional Test every 24 months.	SR 3.3.6.2.6 for Table 3.3.6.2-1 Function 4	N/A
M6	The CTS allowance to delay entry into the associated Limiting Conditions for Operation and required action for 6 hours during the performance of instrumentation surveillances when primary containment isolation valves are placed in an inoperable status has not been included in the ITS.	N/A	Table 3.2-1 Note 2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M7	The CTS Applicability of the primary containment isolation instrumentation is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the secondary containment isolation instrumentation must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	Table 3.3.6.2-1	3.2.A, Table 3.2-1 Note 1
3.3.7.1, CREVAS SYSTEM INSTRUMENTATION			
M1	The CTS Applicability of the CREVAS System instrumentation is whenever the reactor water temperature is above 212 °F and fuel is being handled. The Applicability in the ITS is MODES 1, 2 and 3, during Core Alterations, during movement of irradiated fuel in the secondary containment, and during operations with a potential for draining the reactor vessel. The ITS adds new Applicability requirements that the CREVAS System instrumentation must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F, during control rod movement in MODE 5, and during operations with a potential for draining the reactor vessel.	3.3.7.1 Applicability	3.11.A.1, 3.11.A.2. RETS 3.10
M2	The CHANNEL CHECK Frequency for the CREVAS air intake radiation - high Function is being increased from daily in the RETS to every 12 hours in the ITS.	SR 3.3.7.1.1	RETS Table 3.10-2
M3	The CTS requires the initiation of the Control Room Emergency Ventilation Air Supply (CREVAS) System in the isolate mode of operation when the Control Room Air Intake Radiation channel is inoperable; however, no finite completion time is provided. In the ITS, a completion time of 1 hour is provided for this action, and an optional action is also provided. This action is to declare both CREVAS subsystems inoperable within 1 hour in lieu of placing the system in the isolate mode.	3.3.7.1 ACTION A	3.11.A.2, RETS Table 3.10-1 Note (g)
3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CHANNEL CHECK Frequency for the Main Steam Line High Radiation Function is being increased from daily in the CTS to every 12 hours in the ITS.	SR 3.3.7.2.1	Table 4.2-1 Instrument Check Frequency for Instrument Channel 8
3.3.7.3, ESW SYSTEM INSTRUMENTATION			
M1	An Allowable Value has been added for the ESW pressure instrumentation channels.	SR 3.3.7.3.1	N/A
3.3.8.1, LOP INSTRUMENTATION			
M1	A new Surveillance Requirement has been added to require a Logic System Functional Test of the LOP Instrumentation every 24 months.	SR 3.3.8.1.2	N/A
M2	The CTS does not provide an Applicability for the LOP Instrumentation. The ITS adds the Applicability requirements of MODES 1, 2, and 3, and when the associated emergency diesel generator is required to be Operable by LCO 3.8.2.	3.3.8.1 Applicability	N/A
3.3.8.2, RPS ELECTRIC POWER MONITORING			
M1	The CTS does not provide any actions if the RPS monitoring assemblies are inoperable in MODE 5 with a control rod withdrawn for a core cell containing one or more fuel assemblies. The ITS adds an appropriate ACTION that requires action to be initiated immediately to insert any withdrawn control rod in cells containing fuel.	3.3.8.2 ACTION D	N/A
M2	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if a required RPS electric power monitoring assembly is not restored or taken out of service with the allowed time. In the ITS, MODE 3 must be met within 12 hours.	3.3.8.2 ACTION C	3.0.C

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS setpoint (changed to Allowable Value as discussed in DOC A3) for the alternate power supply undervoltage Function has been changed from > 108 V in the CTS to ≥ 109.9 V in the ITS.	SR 3.3.8.2.3	4.9.G.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, RECIRCULATION LOOPS OPERATING		
M1	CTS 3.5.J is applicable when the reactor is in the run mode. ITS 3.4.1 is applicable in MODES 1 and 2. This change is necessary since there is significant energy in the core in MODE 2 and postulated design basis accidents may occur in this condition.	3.4.1	3.5.J
M2	A new requirement has been added, which requires that the recirculation loop jet pump flow mismatch with both recirculation loops in operation be within the specified limits. Appropriate ACTIONS and an SR has also been added.	LCO 3.4.1, 3.4.1 ACTIONS B and C, SR 3.4.1.2	N/A
M3	An SR has been added to verify operation is outside the "Exclusion Region" of the power-to-flow map specified in the COLR every 12 hours. The SR ensures the reactor THERMAL POWER and core flows are within appropriate parameter limits to prevent uncontrolled power oscillations. At low recirculation flows and high reactor power, the reactor exhibits increased susceptibility to thermal hydraulic instability. In addition, a Note is included which states that this SR is only required to be performed in MODE 1 because during plant operation in MODE 2 the APRM Neutron Flux-High (Startup) Function of ITS 3.3.1.1 will prevent entry into the "Exclusion Region."	SR 3.4.1.1	N/A
	3.4.2, JET PUMPS		
M1	The CTS requires that, if a jet pump is determined to be inoperable, that the reactor be placed in Cold Shutdown within 24 hours. CTS 3.0.A states that "Limiting Conditions for Operation and Action requirements shall be applicable during the Operational Conditions (modes) specified for each specification." CTS 3.6.G is applicable in the Startup/Hot Standby and Run MODES; therefore, the requirement to place the plant in Cold Shutdown is not applicable after reaching the Hot Shutdown mode, and the CTS essentially allows 24 hours to reach Hot Shutdown. The ITS requires that, if one or more jet pumps are inoperable, the plant be placed in MODE 3 in 12 hours. The ITS effectively reduces the time to reach Mode 3 from 24 hours to 12 hours.	3.4.2 ACTION A	3.6.G

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS requires that certain conditions do not occur simultaneously. Two of these conditions are, (1) the two recirculation loops have a flow imbalance of ≥ 10% when the pumps are operated at the same speed, and (2) the indicated value of core flow rate varies from the value derived from loop flow measurements by > 10%. The ITS specifies one condition that may be used to verify operability of the jet pumps to be, "recirculation pump flow to speed ratio and recirculation loop jet pump flow to recirculation pump speed ratio both differ by ≤ 5% from established patterns." This change imposes new requirements on recirculation pump flow to speed ratio and recirculation loop jet pump flow to recirculation pump speed ratio.	SR 3.4.2.1	4.6.G
	3.4.3, SAFETY/RELIEF VALVES		
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours if the minimum number of Operable safety/relief valves is not met. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.4.3 Required Action A.1	3.6.E.2
M2	The CTS requires the safety/relief valves to be manual opened every 24 months. The ITS requires this same manual opening, but also requires the actuation to be initiated on a Staggered Test Basis for each valve solenoid. This will ensure that both solenoids will be tested every 48 months.	SR 3.4.3.2	4.6.E.4
	3.4.4, RCS OPERATIONAL LEAKAGE		
M1	The CTS is revised to adopt the requirement that no Reactor Coolant System (RCS) pressure boundary LEAKAGE exist, and should it occur, to be in MODE 3 in 12 hours and in MODE 4 in 36 hours.	LCO 3.4.4.a, 3.4.4 ACTION C	3.6.D1
M2	The CTS requires that the source of an increase in leakage be identified within 4 hours. The ITS requires that the source of an increase in LEAKAGE be verified not to be service sensitive type 304 or type 316 austenitic stainless steel within 4 hours. This change seeks to ensure that new or additional RCS LEAKAGE is not the result of intergranular stress corrosion cracking (IGSCC) in the reactor coolant pressure boundary (RCPB).	3.4.4 Required Action B.2	3.6.D.3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS requires the reactor coolant leakage into the primary containment to be within limits anytime irradiated fuel is in the reactor vessel and the reactor coolant temperature is above 212°F. The ITS Applicability is during MODES 1, 2 and 3. The CTS requirement to be Operable when the reactor coolant temperature is greater than 212°F only covers ITS MODES 1 and 3. Therefore, the addition of MODE 2 is an additional requirement not explicitly established in the CTS.	3.4.4 Applicability	3.6.D
	3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION		
M1	CTS Table 4.6-2 does not require performance of an Instrument Functional Test, and requires that a Sensor Check be performed once per day for the Containment Atmosphere Monitoring System channels. The ITS requires that a CHANNEL CHECK be performed at a Frequency of 12 hours and a CHANNEL FUNCTIONAL TEST be performed at a Frequency of 31 days. This change imposes more frequent performance of the CHANNEL CHECK and adds the new requirement to perform a CHANNEL FUNCTIONAL TEST.	SR 3.4.5.1, SR 3.4.5.2	Table 4.6-2
M2	CTS 3.6.D.4 requires the operability of the Primary Containment Sump Monitoring System and the Continuous Atmosphere Monitoring System. CTS 3.6.D.5 provides the appropriate actions if the Primary Containment Sump Monitoring System is inoperable and CTS 3.6.D.6 provides the appropriate actions if the Continuous Atmosphere Monitoring System (particulate and gaseous) is inoperable. The CTS does not provide any restrictions if both the Primary Containment Sump Monitoring System and the Continuous Atmosphere Monitoring System (particulate and gaseous) are inoperable at the same time. The ITS includes an ACTION that requires ITS LCO 3.0.3 be entered immediately if all leakage detection systems are inoperable.	3.4.5 ACTION E	N/A
	3.4.6, RCS SPECIFIC ACTIVITY		
M1	A new action has been added that will require the determination of DOSE EQUIVALENT I-131 every 4 hours whenever the DOSE EQUIVALENT I-131 specific activity limit is exceeded. Currently, the CTS does not require this action.	3.4.6 Required Actions A.1 and B.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS requires the reactor to be placed in the cold shutdown condition (MODE 4) within 24 hours if the iodine concentration exceeds the equilibrium limit by more than a factor of 10. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.4.6 Required Action B.2.2.1	N/A
M3	The Frequency to perform an isotopic analysis of a sample of reactor coolant every 31 days has been changed to at least once per 7 days.	SR 3.4.6.1	4.6.C.1.b
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN			
M1	A new Specification is being added requiring two RHR shutdown cooling subsystems to be Operable in MODE 3 with reactor steam dome pressure less than the shutdown cooling permissive pressure. Appropriate Actions and a Surveillance Requirement are also being added. Currently, no Specification exists.	3.4.7	N/A
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN			
M1	A new Specification is being added requiring two RHR shutdown cooling subsystems to be Operable in MODE 4. Appropriate Actions and a Surveillance Requirement are also being added. Currently, no Specification exists.	3.4.8	N/A
3.4.9, RCS P/T LIMITS			
M1	The CTS requires that RCS pressure and temperature be recorded within 30 minutes prior to withdrawal of control rods to bring the reactor critical. The ITS requires this verification to be performed within 15 minutes prior to control rod withdrawal for the purpose of achieving criticality.	SR 3.4.9.2	4.6.A.4
M2	The CTS requires that, in the event the RCS pressure and temperature limits are exceeded, it be determined that the RCS remains acceptable for continued operation. There is no Completion Time associated with this requirement. The ITS requires that this determination be made in 72 hours.	3.4.9 Required Action A.2	3.6.A.5

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS requires that certain RCS differential temperature measurements be recorded within 30 minutes prior to startup of an idle recirculation loop. The ITS require that these differential temperature measurements be verified within 15 minutes prior to startup of an idle recirculation loop.	SR 3.4.9.3, SR 3.4.9.5	4.6.A.6
M4	The CTS does not provide any actions to be taken if a P/T limit is not met in MODES other than MODES 1, 2, and 3. The ITS includes a new action that requires action be initiated immediately to restore the parameters to within limits and to determine, prior to entering MODE 2 or 3, whether the RCS is acceptable for continued operation.	3.4.9 ACTION C	N/A
CTS 3/4.6.F, STRUCTURAL INTEGRITY			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS - OPERATING		
M1	The CTS permits up to 10 days of continuous operation from the time steam becomes available until HPCI Surveillances need to be performed. The Notes to the applicable ITS Surveillances will allow only 12 hours from the time reactor steam pressure and flow are adequate to perform the test. The 12 hours is deemed to be adequate to perform the testing involved without impacting plant operation.	SR 3.5.1.8 Note, SR 3.5.1.9 Note, SR 3.5.1.10 Note 1	4.5.C
M2	The CTS requires that HPCI deliver at least 4,250 gpm (modified by DOC L7) is being divided into two separate Surveillance Requirements. The first ITS Surveillance will require a demonstration of the HPCI pump capability at nominal conditions (970 to 1040 psig in the reactor steam dome). Reactor pressures of ≥ 970 psig and ≤ 1040 psig represents a nominal value at rated conditions within the CTS required band for testing. This pressure range represents conditions of lower driving pressure for the HPCI turbine and thus, a more restrictive condition under which to provide the required flow. The second ITS Surveillance will require a demonstration of the HPCI pump capability ≤ 165 psig. Reactor pressure of ≤ 165 psig is near the lower limit (i.e., ≥ 150 psig) of operability/capability of the HPCI turbine, yet provides a 15 psig range above the lower limit in which to conduct the test. CTS required that the HPCI test confirm the capability of the pump at 150 psig. As a practical consideration, the test is performed when sufficient pressure is available at near 150 psig. To require the test at ≤ 150 psig would be to require a test of the capability of the pump outside the required operability range.	SR 3.5.1.8, SR 3.5.1.9	4.5.C.1
M3	The CTS requires that at least 5 of the 7 ADS valves be Operable. The ITS requires that at least 6 of the ADS valves be Operable. The proposed change also adds two Actions that do not exist in the CTS. The first Action contains requirements for what to do if one of the six required ADS valves is inoperable. The Action allows up to 14 days to restore the inoperable ADS valve. The second ACTION limits continued reactor operation to 72 hours when there is a simultaneous inoperability of one required ADS valve (one of the six required ADS valves) and one low pressure ECCS (CS or LPCI) subsystem or one LPCI pump inoperable in each subsystem. These requirements are more restrictive because current requirements would allow continued plant operation under the same conditions.	LCO 3.5.1. 3.5.1 ACTIONS E and F	3.5.D.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the ACTIONS or Completion Times associated with an inoperable LPCI or CS System cannot be satisfied, when the ACTIONS associated with an inoperable HPCI or ADS System cannot be satisfied, and when both LPCI independent power supplies are made or found to be inoperable. This specific default action has been interpreted to also require entry when the ACTIONs or Completion Times associated with one inoperable LPCI independent power supply are not met since no other exists. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.5.1 Required Actions B.1 and G.1	3.5.A.6 3.5.C.1.6 3.5.D.2 3.9.F.3
M5	The CTS requires that recirculation pump discharge valves be demonstrated Operable (capable of being closed) following "any period of reactor cold shutdown exceeding 48 hours". This requirement is proposed to be replaced in the ITS by a Surveillance that requires that recirculation pump discharge valve Operability verification be performed once each startup prior to exceeding > 25% RTP. Recirculation pump discharge valves are not required while the plant is shutdown. The requirement to perform the verification once each startup prior to exceeding 25% RTP is more restrictive than the existing requirement to perform the test since the test will now be required to be performed within 31 days of any startup not just a startup from a Cold Shutdown that exceeded 48 hours.	SR 3.5.1.6	4.5.A.5
M6	A new requirement to verify the ADS pneumatic supply header pressure has been added to the ITS.	SR 3.5.1.3	N/A
M7	A new requirement to verify that each inverter output voltage is ≥ 576 V and ≤ 624 V while supplying the respective bus has been added.	SR 3.5.1.5	4.9.F.7
M8	The CTS states that the reactor shall not be made critical unless both LPCI MOV Independent Power Supplies are operable. This is effectively MODES 1 and 2. The ITS requires the low pressure core injection subsystems to be Operable in MODES 1, 2 and 3. Since the operability of the LPCI MOV Independent Power Supply affects the OPERABILITY of the associated LPCI subsystem, the operability requirements of LPCI MOV Independent Power Supplies have been extended to MODE 3.	3.5.1 Applicability	3.9.F.1
M9	The CTS requires the safety/relief valves to be manually opened every 24 months. The ITS requires this same manual opening, but also requires the actuation to be initiated on a Staggered Test Basis for each valve solenoid. This will ensure that both solenoids will be tested every 48 months.	SR 3.5.1.13	4.6.E.4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M10	The CTS requires all recirculation pump discharge valves to be Operable prior to reactor startup (or closed if permitted elsewhere in these specifications). The ITS and associated Surveillance Requirement also require all recirculation pump discharge valves to be Operable. However, if this requirement can not be met, then the Surveillance requires the associated recirculation pump discharge valve to be "de-energized" in the closed position. Requiring the inoperable recirculation pump discharge valve to also be "de-energized" in the closed position represents an additional restriction on plant operation.	SR 3.5.1.6	3.5.A.5
M11	The CTS requires the HPCI System discharge piping to be vented from the high point of the system whenever HPCI is lined up to take suction from the condensate storage tank (CST) on a monthly basis. In the ITS, this requirement must be met whenever HPCI is required to be Operable whether it is aligned to the CST or the suppression pool.	SR 3.5.1.1	4.5.G.3
M12	CTS 3.5.A.1 and 3.5.A.3 require the Core Spray (CS) and Low Pressure Coolant Injection (LPCI) Systems, respectively to be Operable whenever irradiated fuel is in the reactor vessel and prior to reactor startup from cold shutdown (this covers MODES 1, 2 in the ITS). CTS 3.5.A specifies requirements for the LPCI cross tie valves whenever reactor water temperature is greater than 212°F (this covers MODES 1, 3, and portions of MODE 2 operations). In addition, CTS 3.5.A.5 specifies requirements for the recirculation pump discharge valves prior to reactor startup (this covers MODE 1 and 2 in the ITS). The ITS Applicability for these components and Systems (Applicability of ITS 3.5.1) are MODES 1, 2 and 3. This change is more restrictive since the Applicability of all portions of the CS and LPCI subsystems have been changed to cover all three plant operating modes.	3.5.1 Applicability	3.5.A.1, 3.5.A.3, 3.5.A.3.b, 3.5.A.5
M13	An actual or simulated automatic isolation test has been added to the requirements of CTS Table 4.2-2 Item 3 (Part 2) (Containment Cooling Subsystem) to ensure both a Logic System Functional Test as well as an actual or simulated automatic isolation test is performed for all associated Low Pressure Coolant Injection (LPCI) System Functions currently included in Table 3.2-2 and 4.2-2. The new Surveillance will ensure CTS Table 3.2-1 Items 5 and 6 (ITS Table 3.3.5.1-1 Functions 2.e and 2.h, Reactor Vessel Shroud Level (Level 0) and Containment Pressure - High) are properly tested throughout their operating sequence.	SR 3.5.1.10	N/A
3.5.2, ECCS - SHUTDOWN			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	CTS 3.5.F.4 requires the Secondary Containment Integrity to be established within 8 hours if any of the other actions in CTS 3.5.F.4 are not met (e.g., suspend OPDRVs, restore at least one ECCS low pressure injection/spray subsystem to Operable status). If Secondary Containment Integrity is not established, no other actions are provided. The ITS requires similar a similar action to establishing Secondary Containment Integrity (as modified by DOC A4), except that in lieu of 8 hours to establish Integrity, the action is to "initiate action." This will ensure actions are continued to establish secondary containment integrity, even is not established within 8 hours.	3.5.2 Required Actions D.1, D.2, and D.3	3.5.F.4
M2	The CTS permits both Core Spray (CS) subsystems to be considered operable in MODES 4 and 5 when the subsystems are taking a suction from the CSTs. The ITS allows only one CS subsystem to be considered operable when taking a suction from the CSTs during operations with the potential for draining the vessel (OPDRVs).	SR 3.5.2.2.b Note	4.5.F.4
M3	CTS 3.5.F.3 provides an exception to the ECCS low pressure applicability requirements in CTS 3.5.F.1 and 3.5.F.2 whenever the reactor vessel head is removed, the cavity is flooded, the spent fuel gates are removed and water level above the fuel is in accordance with CTS 3.10.C. CTS 3.10.C requires the level to be 33 feet above the bottom of the spent fuel storage pool. The corresponding Applicability of the ITS is MODE 5, except with the spent fuel storage gate removed and the reactor vessel water level $\geq$ 22 ft 2 inches above the top of the reactor vessel flange. This corresponds to an increase of over 4 ft from the CTS requirement.	3.5.2 Applicability	3.5.F.3
M4	The CTS requires the suspension of all operations with the potential for draining the vessel (OPDRV) when the requirements of CTS 3.5.F.1, 3.5.F.2 or 3.5.F.3 are not satisfied. However, a completion time is not specified. The ITS is explicit and requires to initiate action to suspend OPDRVs immediately.	3.5.2 Required Action C.1	3.5.F.4
3.5.3, RCIC SYSTEM			
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) and pressure less than 150 psig within 24 hours when the ACTIONS or Completion Times associated with the inoperable RCIC System cannot be satisfied. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.5.3 Required Action B.1	3.5.E.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS permits up to 10 days of continuous operation from the time steam becomes available until RCIC Surveillances need to be performed. The Notes to the applicable ITS Surveillances will allow only 12 hours from the time reactor steam pressure and flow are adequate to perform the test. The 12 hours is deemed to be adequate to perform the testing involved without impacting plant operation.	SR 3.5.3.3 Note, SR 3.5.3.4 Note, SR 3.5.3.5 Note 1	4.5.E.1
M3	The CTS requires that RCIC deliver at least 400 gpm is being divided into two separate Surveillance Requirements. The first ITS Surveillance will require a demonstration of the RCIC pump capability at nominal conditions (970 to 1040 psig in the reactor steam dome). Reactor pressures of ≥ 970 psig and ≤ 1040 psig represents a nominal value at rated conditions within the CTS required band for testing. This pressure range represents conditions of lower driving pressure for the RCIC turbine and thus, a more restrictive condition under which to provide the required flow. The second ITS Surveillance will require a demonstration of the RCIC pump capability ≤ 165 psig. Reactor pressure of ≤ 165 psig is near the lower limit (i.e., ≥ 150 psig) of operability/capability of the RCIC turbine, yet provides a 15 psig range above the lower limit in which to conduct the test. CTS required that the RCIC test confirm the capability of the pump at 150 psig. As a practical consideration, the test is performed when sufficient pressure is available at near 150 psig. To require the test at ≤ 150 psig would be to require a test of the capability of the pump outside the required operability range.	SR 3.5.3.3, SR 3.5.3.4	4.5.E.1.d
M4	The CTS requires the RCIC System discharge piping to be vented from the high point of the system whenever RCIC is lined up to take suction from the condensate storage tank (CST) on a monthly basis. In the ITS, this requirement must be met whenever RCIC is required to be Operable whether it is aligned to the CST or the suppression pool.	SR 3.5.3.1	4.5.G.3
M5	Not used.	N/A	N/A
M6	Not used.	N/A	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, PRIMARY CONTAINMENT		
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment is inoperable. In the ITS (after a short restoration time as discussed in DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.1 Required Action B.1	3.7.A.8
M2	The CTS requires the drywell to suppression chamber leak rate to be verified. The ITS includes a new requirement that if two consecutive leak tests fail, the leak test must be repeated every 12 months until two consecutive leak tests pass. Two consecutive test failures would indicate unexpected primary containment degradation, and increasing the Frequency to once every 12 months establishes the acceptability of the drywell to suppression chamber leakage sooner.	SR 3.6.1.1.2 second Frequency	N/A
M3	The CTS Applicability of the Primary Containment is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.1 Applicability	3.7.A.2
M4	The CTS requirement that the drywell to suppression chamber leak rate test be conducted at 1 psid is being changed to a differential pressure of ≥ 1 psi.	SR 3.6.1.1.2	4.7.A.5.d
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS		
M1	The CTS requirement that requires at least one door in each air lock is closed and sealed is being revised to require both air lock doors be OPERABLE in the ITS. In addition, appropriate ACTIONS have been added for when one of the two doors is inoperable.	LCO 3.6.1.2, 3.6.1.2 ACTION A	3.7.A.2, 1.0.M
M2	A New Surveillance Requirement has been added to verify that only one door in the primary containment air lock can be opened at a time. In addition, a new ACTION has been added to cover the case when an interlock mechanism is inoperable. Currently, the CTS does not require the interlock mechanism to be Operable.	3.6.1.2 ACTION B, SR 3.6.1.2.2	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment Air Lock(s) is inoperable. In the ITS (after the appropriate restoration times as discussed in DOCs M1, M2, and L3), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.2 Required Action D.1	3.7.A.8
M4	The CTS Applicability of the Primary Containment Air Locks is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment Air Locks must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.2 Applicability	3.7.A.2
	3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES		
M1	The CTS Applicability of the Primary Containment Isolation Valves is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the Primary Containment Isolation Valves must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F. In addition, the ITS includes an Applicability of "When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation."" This effectively adds a MODES 4 and 5 requirement for the RHR SDC isolation valves. Due to this addition, a new ACTION has been added for these valves.	3.6.1.3 Applicability, 3.6.1.3 ACTION G	3.7.D.1
M2	The CTS surveillance that tests for proper operation of the instrument line EFCVs does not include an acceptance criteria. The ITS specifies an acceptance criteria that the EFCVs actuate to the isolation position on a simulated instrument line break.	SR 3.6.1.3.8	4.7.D.1.b
M3	The CTS surveillance that tests and times the closure of the MSIVs does not include a closure time. The ITS specifies an MSIV closure time of $\geq$ 3 seconds and $\leq$ 5 seconds.	SR 3.6.1.3.6	4.7.D.1.d

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The ITS includes four new Surveillance Requirements to a) verify (each 31 days) each PCIV manual isolation valve, or blind flange that is located outside of primary containment and not locked, sealed or otherwise secured and is required to be closed during accident conditions is closed; b) verify (prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days) each PCIV manual isolation valve, or blind flange that is located inside of primary containment and not locked, sealed or otherwise secured and is required to be closed during accident conditions is closed; c) verify (each 31 days) continuity of the traversing incore probe (TIP) shear isolation valve explosive charge; and d) remove and test (each 24 months on a STAGGERED TEST BASIS) the explosive squib from each shear isolation valve of the Tip System.	SR 3.6.1.3.2, SR 3.6.1.3.3, SR 3.6.1.3.4, SR 3.6.1.3.9	N/A
M5	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Primary Containment Isolation Valves are not restored to Operable status within certain time limits. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.3 Required Action F.1	3.7.D.3
M6	The CTS requires that LPCI and Core Spray Systems air operated testable check valves to be leak tested, with the limit ≤ 11 scfm per valve when pneumatically tested at ≥ 45 psig at ambient temperature. The pneumatic test limit is being decreased to ≤ 10 scfm as shown in the Bases for the applicable SR (limits moved to Bases as described in DOC LA1).	SR 3.6.1.3.11	4.7.A.2.c
M7	The CTS requirement that 27MOV-120 (the 12 inch, full-flow valve) be verified closed when containment integrity is established, and then once per month, is being replaced in the ITS with a requirement to verify that each 20 and 24 inch primary containment purge and vent valve is closed every 31 days, since the purge and vent valves are the actual primary containment isolation valves (PCIVs) associated with these penetrations. In addition, the CTS allows inerting and de-inerting operations only with valve 27MOV-121 (the 6 inch, low flow valve), it is understood that the primary containment purge and vent valves must be opened for these operations. Therefore, the ITS includes a Note that allows these operations to occur as long as the full-flow line (27MOV-120) is closed and one or more SGT System reactor building suction valves are open. This provides protection for the SGT filter trains from over pressure concerns. This change is considered more restrictive since the primary containment vent and purge valves are required to be closed when these operations are not underway.	SR 3.6.1.3.1, including Note	3.7.B.4, 4.7.B.4
3.6.1.4, DRYWELL PRESSURE			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	A new Specification requiring drywell pressure to be ≤ 1.95 psig is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.6.1.4	N/A
	3.6.1.5, DRYWELL AIR TEMPERATURE		
M1	A new Specification requiring drywell air temperature to be ≤ 135°F is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.6.1.5	N/A
	3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS		
M1	The CTS allows 7 days to restore an inoperable reactor building-to-suppression chamber vacuum breaker provided primary containment integrity is maintained. In the ITS, restoration is required within 72 hours.	3.6.1.6 ACTION A and C	3.7.A.4.b
M2	A new Surveillance Requirement has been added to verify that the reactor building-to-suppression chamber vacuum breakers are closed.	SR 3.6.1.6.1	N/A
M3	A new Surveillance Requirement has been added to verify that the reactor building-to-suppression chamber self actuating vacuum breakers are capable of opening at a differential pressure of ≤ 0.5 psid.	SR 3.6.1.6.4	N/A
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable reactor building-to-suppression chamber vacuum breaker is not met or when two vacuum breakers are inoperable. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.6 Required Action E.1	3.7.A.8
M5	The CTS requires a functional test of the instrumentation associated with the suppression chamber-reactor building vacuum breakers every 92 days, and also requires the setpoint to be at ≤ 0.5 psi. The ITS requires a CALIBRATION (instead of a function test) of each air operated vacuum breaker differential pressure instrument channel, including a verification that the setpoint is ≤ 0.5 psid. This change is more restrictive since it will require a complete check of each instrument loop and the sensor.	SR 3.6.1.6.3	4.7.A.4.b 3.7.A.4.a

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	The CTS Applicability of the reactor building-to-suppression chamber vacuum breakers is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the reactor building-to-suppression chamber vacuum breakers must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.6 Applicability	3.7.A.4.a 3.7.A.2
M7	The CTS identifies that two reactor building-to-suppression chamber vacuum breakers shall be OPERABLE. The ITS LCO requires each of the two vacuum breakers (the self actuated valve and the air operated valve) in each of the two vacuum relief lines shall be OPERABLE. The CTS identifies the Required Actions if one reactor building-to-suppression chamber vacuum breaker is inoperable (without specifying whether the vacuum relief or the containment isolation function of the valve is inoperable). The CTS has been modified to specifically address inoperability of the containment isolation function of one vacuum breaker valve. If more than one vacuum breaker is inoperable (or the actions and associated completion times are not met), the default action of the CTS must be entered which requires the reactor be placed in the cold condition within the following 24 hours. The CTS has been modified by providing additional more restrictive actions that specifically address the inoperability of containment isolation functions and vacuum relief of the vacuum breaker valves in each of the vacuum relief lines. The ITS ACTIONS: a) addresses inoperability of the containment isolation function of two (both) vacuum breakers in a line and consistent with ITS 3.6.1.3, ACTION B, 1 hour is allowed to correct the loss of containment capability; b) addresses the inoperability of the vacuum relief function of one vacuum relief line due to one or more vacuum breaker valves in the line not being capable of opening (while the vacuum relief function is maintained by the vacuum relief valves in the other line) and 72 hours is allowed to correct the condition; and c) addresses loss of the vacuum relief function of two (both) vacuum relief lines and 1 hour is allowed to correct the condition.	LCO 3.6.1.6, 3.6.1.6 ACTIONS A,B, C, and D	3.7.A.4.a, 3.7.A.4.b
3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS			
M1	A new Surveillance Requirement has been added to verify that each suppression chamber-to-drywell vacuum breaker is closed every 14 days.	SR 3.6.1.7.1	N/A
M2	The CTS allows 7 days to restore an inoperable suppression chamber-to-drywell vacuum breaker. In the ITS, restoration is required within 72 hours.	3.6.1.7 ACTION A	3.7.A.5.c, 3.7.A.5.g

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS requires an inoperable vacuum breaker (i.e., an open vacuum breaker) to be locked closed; however no specific time is provide to close the vacuum breaker. The ITS will require the open vacuum breaker to be closed within 2 hours. The requirement to lock the vacuum breaker closed is not included in the ITS, since once the open vacuum breaker is closed, it is now considered Operable.	3.6.1.7 ACTION B	3.7.A.5.g
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable suppression chamber-to-drywell vacuum breaker is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.7 Required Action C.1	3.7.A.8
M5	The CTS Applicability of the suppression chamber-to-drywell vacuum breakers is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression chamber-to-drywell vacuum breakers must be Operable at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.1.7 Applicability	3.7.A.4.a
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION (MSLC) SYSTEM			
M1	A new Specification requiring two MSLC subsystem to be Operable is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.6.1.8	N/A
3.6.1.9, RHR CONTAINMENT SPRAY			
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable RHR containment spray subsystem is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.1.9 Required Action C.1	3.5.B.4
M2	The CTS requires a pump operability and flow rate test, but no acceptance criteria is provided. The ITS includes a specific flow rate and flow path.	SR 3.6.1.9.2	4.5.B.1.a

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE		
M1	The ITS includes a new action to verify temperature is ≤ 110 °F once per hour when the temperature has exceeded 95 °F and no testing that adds heat to the suppression pool is being performed.	3.6.2.1 Required Action A.1	N/A
M2	The ITS includes new actions if the temperature is > 110 °F. In addition to requiring a reactor scram (which is consistent with the CTS requirements), the ITS will require suppression pool temperature to be verified ≤ 120 °F once per 30 minutes and that the reactor be placed in MODE 4 within 36 hours.	3.6.2.1 Required Actions D.2 and D.3	N/A
M3	The CTS requires that, during reactor isolation conditions, the reactor pressure vessel be depressurized to less than 200 psig if pool temperature reaches 200 °F. The ITS requires the depressurization action regardless of whether or not the reactor is isolated. In addition, the ITS requires the depressurization to 200 psig to be completed within 12 hours and for the plant to be in MODE 4 within 36 hours.	3.6.2.1 ACTION E	3.7.A.1.c.(4)
M4	The CTS Applicability of the suppression pool average temperature is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression pool average temperature must be within limits at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.2.1 Applicability	3.7.A.1
	3.6.2.2, SUPPRESSION POOL WATER LEVEL		
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the suppression pool water level limits are not met. In the ITS (after the appropriate restoration time as modified by DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.2.2 Required Action B.1	3.7.A.8

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS Applicability of the suppression pool water level is whenever the reactor is critical or when the reactor water temperature is above 212 °F and fuel is in the reactor vessel. The Applicability in the ITS is MODES 1, 2 and 3, which adds a new Applicability requirement that the suppression pool water level must be within limits at all times in MODE 2 even prior to any plant startup when reactor coolant temperature may be below 212 °F.	3.6.2.2 Applicability	3.7.A.1
3.6.2.3, RHR SUPPRESSION POOL COOLING			
M1	The CTS requires a pump operability and flow rate test, but no acceptance criteria is provided. The ITS includes a specific flow rate and flow path.	SR 3.6.2.3.2	4.5.B.1.a
M2	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Required Actions and associated Completion Times for an inoperable RHR suppression pool cooling subsystem is not met. In the ITS (after the appropriate restoration times), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.2.3 Required Action C.1	3.5.B.4
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE			
NONE	NONE	NONE	NONE
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION			
NONE	NONE	NONE	NONE
3.6.3.2, CAD SYSTEM			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	A new Specification requiring two CAD subsystems to be Operable is included in the ITS, consistent with the accident analysis assumptions. Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.6.3.2	N/A
	3.6.4.1, SECONDARY CONTAINMENT		
M1	The ITS includes an additional Applicability, during operations with a potential for draining the reactor vessel. An appropriate ACTION has also been added.	3.6.4.1 Applicability, 3.6.4.1 Condition C, 3.6.4.1 Required Action C.3	3.7.C.1
M2	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Secondary Containment is inoperable. In the ITS (after a short restoration time as discussed in DOC L1), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.4.1 Required Action B.1	3.7.C.2
M3	The CTS requires that if the Secondary Containment is inoperable, procedures shall be initiated to suspend activity that can reduce the shutdown margin and movement of irradiated fuel in the reactor building; however, no specific time limit to start or complete the actions is provided. The ITS will require immediate suspension of these activities.	3.6.4.1 Required Actions C.1 and C.2	3.7.C.2
M4	The CTS requires a demonstration of the secondary containment capability to maintain 1/4 inch of water vacuum in the secondary containment; however, no specific time duration for the test is provided. The ITS requires the test to be conducted for 1 hour.	SR 3.6.4.1.4	4.7.C.1.c
M5	The CTS requires a demonstration of the secondary containment capability to maintain 1/4 inch of water vacuum in the secondary containment using one filter train; however the test does not require testing the capability of both SGT trains. One SGT train could be used to perform the test over the life of the plant. The ITS requires the use of both SGT trains on a staggered test basis (i.e., each SGT train will be tested every two refueling outage cycles).	SR 3.6.4.1.4	4.7.C.1.c

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	A new Surveillance Requirement is being added to verify that the secondary containment vacuum is ≥ 0.25 inches water gauge every 24 hours.	SR 3.6.4.1.1	N/A
M7	A new Surveillance Requirement is being added to verify all secondary containment hatches are closed and sealed every 31 days.	SR 3.6.4.1.2	N/A
M8	A new Surveillance Requirement is being added to verify one secondary containment access door is closed in each access opening every 31 days.	SR 3.6.4.1.3	N/A
	3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES		
M1	The CTS only requires the automatic dampers to be Operable. The ITS requires all secondary containment isolation valves, which includes manual valves and blind flanges to be Operable In addition, appropriate ACTIONS for these valves have also been added.	LCO 3.6.4.2, ACTIONS A, B, C, and D	1.0.S.3
M2	The ITS includes an additional Applicability, during operations with a potential for draining the reactor vessel. An appropriate ACTION has also been added.	3.6.4.2 Applicability, 3.6.4.2 Required Action D.3	3.7.C.1
M3	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the Secondary Containment isolation Valves are inoperable. In the ITS (after a short restoration time as discussed in DOCs L3 and L4), an intermediate condition, MODE 3, must be met within 12 hours.	3.6.4.2 Required Action C.1	N/A
M4	The CTS requires that if the Secondary Containment isolation valves are inoperable, procedures shall be initiated to suspend activity that can reduce the shutdown margin and movement of irradiated fuel in the reactor building; however, no specific time limit to start or complete the actions is provided. The ITS will require immediate suspension of these activities.	3.6.4.2 Required Actions D.1 and D.2	3.7.C.2
M5	The ITS includes an additional action when a secondary containment valve is inoperable and the associated penetration has been isolated. The ITS will require a verification that the penetration is isolated every 31 days.	3.6.4.2 Required Action A.2	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	A new Surveillance Requirement has been added to verify each SCIV actuates to the isolation position on an actual or simulated Refuel Area Exhaust Monitor signal.	SR 3.6.4.2.3	N/A
M7	A new Surveillance has been added to verify, every 31 days, that each secondary containment isolation manual valve and blind flange that is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed.	SR 3.6.4.2.1	N/A
M8	A new Surveillance Requirement has been added to verify the isolation time of each power operated automatic SCIV is within limits every 92 days.	SR 3.6.4.2.2	N/A
	3.6.4.3, SGT SYSTEM		
M1	The ITS includes an additional Applicability, during operations with a potential for draining the reactor vessel. An appropriate ACTION has also been added.	3.6.4.3 Applicability, 3.6.4.3 Conditions C and E, 3.6.4.3 Required Actions C.2.3 and E.3	N/A
M2	The CTS allows 31 days to restore a SGT subsystem when one is inoperable during refuel or cold shutdown. The ITS will only allow 7 days to restore the inoperable SGT subsystem.	3.6.4.3 ACTION A	3.7.B.2.b
M3	The CTS requires the reactor to be placed in a cold condition (MODE 4) when the inoperable SGT subsystem is not restored to Operable status within the allowed time; however, no time limit is provided for placing the plant in MODE 4. In the ITS, a 36 hour time limit is provided, and an intermediate condition, MODE 3, must be met within 12 hours.	3.6.4.3 ACTION B	3.7.B.3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS requires the reactor to be placed in a cold condition (MODE 4) when both SGT subsystems are inoperable while in MODE 1, 2, or 3; however, no time limit is provided for placing the plant in MODE 4. In the ITS, an entry into LCO 3.0.3 will be required, which will require action to be initiated within 1 hour to place the plant in MODE 2 within 7 hours, MODE 3 within 12 hours, and MODE 4 within 36 hours.	3.6.4.3 ACTION D	3.7.B.3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M5	When the requirements of CTS 3.7.B.1 (both SGT subsystems required to be Operable) or 3.7.B.2 (plant operation is allowed to continue for a limited time period with one inoperable SGT subsystem provided the redundant SGT subsystem is verified Operable) cannot be met, CTS 3.7.B.3 requires an immediate plant shutdown and the suspension of fuel handling operations. If CTS 3.7.B.3 cannot be met, entry into CTS 3.O.C is permitted and the plant must be in COLD SHUTDOWN within 24 hours. Therefore, if the plant is operating in MODE 1, 2, or 3 and also handling fuel in the secondary containment, the CTS will require the plant to shutdown but not necessarily require the suspension of fuel handling since the default action (CTS 3.0.C) does not address suspension of fuel handling operations. Similarly, if CTS 3.7.B.3 can not be met during fuel handling operations while the plant is shutdown, default to CTS 3.0.C would not require any action to be taken since the plant would have previously been shutdown and suspension of fuel handling is not required by CTS 3.0.C. In ITS 3.6.4.3, if one SGT subsystem is inoperable and not restored to an Operable status within the allowed time (ITS 3.6.4.3, Required Action A.1 and associated Completion Time), while operating in MODE 1, 2, or 3 during fuel handling operations, ITS 3.6.4.3 ACTION B requires a plant shutdown and ITS 3.6.4.3, CONDITION C is concurrently applicable and ACTION C Note does not allow default to ITS 3.0.3 (since default to ITS 3.0.3 would allow Required Action C.1 (or Actions C.2.1, C.2.2, and C.2.3) to be bypassed). Therefore, the proposed addition of ITS 3.6.4.3, ACTION C Note, is an additional restriction that requires that the activities addressed in Required Action C.1 (or Required Actions C.2.1, C.2.2, and C.2.3) be taken rather than be bypassed by defaulting to ITS 3.0.3. In a similar manner, if the Required Actions and Completion Time of ACTION A can not be met during fuel handling operations while shutdown (MODE 4 or 5), the addition of proposed ITS 3.6.4.3, ACTION C Note does not allow default to ITS 3.0.3 and thus is a restriction that is not contained in CTS. In addition ITS 3.6.4.3, Required Action E.1 requires the immediate suspension of movement of irradiated fuel assemblies in the secondary containment, if both SGT subsystems are inoperable. The proposed addition of the Note to CTS 3.7.B.3 (ITS 3.6.4.3 Required Action E.1 Note), which states that LCO 3.0.3 is not applicable, is also a more restrictive change that requires the suspension of irradiated fuel handling operations since default to ITS 3.0.3 is not allowed. Addition of the Note to ITS 3.6.4.3, ACTION C and Required Action E.1, provides clarification and is necessary because although defaulting to LCO 3.0.3 would require the reactor to be shutdown it would not require the suspension of the activities with the potential for releasing radioactive material to the secondary containment. Not allowing LCO 3.6.4.3, ACTION C, and Required Action E.1 to be bypassed by entry in LCO 3.0.3 ensures the suspension of these activities will be addressed, thus placing the plant in a condition that minimizes risk. Therefore, this change is more restrictive but necessary to minimize the probability of release when the secondary containment is not Operable.	3.6.4.3 Required Action C Note, 3.6.4.3 Required Action E.1 Note	3.7.B.3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M6	A new Surveillance Requirement is being added to operate each SGT subsystem for ≥ 10 continuous hours with heaters operating every 31 days.	SR 3.6.4.3.1	N/A
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, RHRSW SYSTEM		
M1	The CTS requires the reactor to be placed in a cold condition (MODE 4) within 24 hours when the ACTIONS or Completion Times associated with inoperable RHRSW pump(s)/subsystem(s) cannot be satisfied. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.7.1 Required Action E.1	N/A
M2	The CTS allows 7 days of operation with RHR service water subsystem inoperable. The ITS includes a Note that would require the applicable Conditions and Required Actions of ITS 3.4.7, "RHR Shutdown Cooling System - Hot Shutdown" to be entered for an RHR SDC subsystem made inoperable by the inoperable RHR Service Water System. This Note is an exception to proposed LCO 3.0.6, which ensures proper ACTIONS are taken for RHR shutdown cooling.	3.7.1 Required Action C.1 Note	N/A
	3.7.2, ESW SYSTEM and UHS		
M1	The CTS requires the reactor to be placed in a cold condition within 24 hours when the ACTIONS or Completion Times associated with inoperable ESW subsystem(s) or inoperable deicing heater(s) cannot be satisfied. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.7.2 Required Action C.1	N/A
M2	Two Surveillance Requirements have been added to verify the water level in each ESW pump screenwell (ensuring that adequate level for ESW pump submergence exists) and to verify the Ultimate Heat Sink temperature (ensuring the temperature of water to the required coolers is consistent with analyses).	SR 3.7.2.1, SR 3.7.2.2	N/A
M3	The CTS requires a minimum of 18 out of 88 heaters to be operable to maintain required flow for the ESW and RHRSW Systems. This requirement is not explicit as to whether heaters in both divisions are required. The ITS requires (in the Bases) that 18 heaters associated with each division are required to be Operable, for a total of 36 heaters.	3.7.2.4 3.7.2.5 3.7.2.6	3.11.E
	3.7.3, CREVAS SYSTEM		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS requires both of the control room emergency ventilation air supply fans and fresh air filter trains to be available whenever the reactor coolant is greater than 212°F and when fuel is handled. The ITS Applicability is during MODES 1, 2 and 3, during the movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS and during operations with a potential of draining the reactor vessel (OPDRVs). The ITS Applicability covers additional modes of operation.	3.7.3 Applicability	3.11.A.1
M2	The CTS requires each control room emergency ventilation air supply fans and dampers to be tested for operability every 3 months; no time duration is specified for the test. The ITS requires the operation of each CREVAS subsystem every 92 days for a time period of greater than or equal to 15 minutes, where each CREVAS subsystem includes testing of the air handling unit fans and recirculation exhaust fans in addition to the air supply booster fans and dampers.	SR 3.7.3.1	4.11.A.1
M3	The CTS allows one emergency ventilation air supply fan and or filter (CREVAS subsystem) to be inoperable for 14 days. After this 14 day period, CTS 3.0.C must be entered since no specific default action exists in the CTS; therefore the plant must be placed in COLD SHUTDOWN within 24 hours. The ITS limits the time one CREVAS subsystem can be inoperable to 7 days, and then, if the unit is in MODES 1, 2, or 3, requires a shutdown to MODE 3 within 12 hours and to MODE 4 within 36 hours. If the plant is moving irradiated fuel in the secondary containment, performing CORE ALTERATIONS, or performing OPDRVs, then the ITS will require the immediate placement of the OPERABLE subsystem in the isolate mode of operation or to immediately suspend movement of irradiated fuel assemblies in the secondary containment, immediately suspend CORE ALTERATIONS and to immediately initiate action to suspend OPDRVs. A Note has been included to proposed ACTION D), which provides an exception to CTS 3.0.C (ITS LCO 3.0.3) if the Required Actions can not be met. This clarification was necessary because defaulting to LCO 3.0.3 would require the reactor to be shutdown but would not require the suspension of the activities that have the potential for releasing radioactivity that might require isolation of the control room and operation of CREVAS in the isolate mode.	3.7.3 ACTIONS A, C, and D	3.11.A.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS allows reactor or refueling operations to continue for 3 days with both control room emergency ventilation subsystems inoperable. After this time period the plant must be in a cold shutdown within 24 hours and any handling of irradiated fuel, core alterations, and operations with a potential for draining the reactor vessel shall be suspended as soon as practicable. The ITS does not allow this condition to occur; an shutdown will be required if both CREVAS subsystems are inoperable due to actual inoperability of the CREVAS subsystems. However, the ITS allows 24 hours to restore an inoperable control room boundary in MODES 1, 2, and 3. Failing to restore the boundary following these provisions, the plant is required to be in cold shutdown within 36 hours. In addition, the ITS provides an intermittent allowance to administratively open the control room boundary (which impacts both division of CREVAS).	3.7.3 LCO Note, 3.7.3 ACTIONS B, C, E, and F	3.11.A.3
M5	The CTS requires the main control room emergency ventilation air supply system capacity to be tested every 18 months to assure that it is within 10% of the design value of 1000 cfm. The ITS will require a verification that each CREVAS subsystem can maintain a positive pressure of $\geq$ 0.125 inches of water gauge relative to atmosphere and turbine building during the isolate mode of operation at a flow rate of $\geq$ 900 scfm and $\leq$ 1100 scfm every 18 months on a STAGGERED TEST BASIS (added per DOC L1).	SR 3.7.3.3	4.11.A.5
M6	The CTS requires the suspension of any handling of irradiated fuel, whenever both control room emergency ventilation systems are inoperable. If this action cannot be completed LCO 3.0.C must be entered and a plant shutdown is required. The ITS includes a Note that provides an exception to ITS LCO 3.0.3 if the Required Actions can not be met. This clarification was necessary because defaulting to LCO 3.0.3 would require the reactor to be shutdown but would not require the suspension of the activities that have the potential for releasing radioactivity that might require isolation of the control room and operation of the CREVAS System in the isolate mode.	3.7.3 ACTION E Note	3.11.A.3, 3.0.C
3.7.4, CONTROL ROOM AC SYSTEM			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	A new Specification is added that delineates specific requirements for operability of the Control Room Air Conditioning System. This system is necessary to assure the habitability of the control room in a post design basis accident environment. The new Specification requires two subsystems to be OPERABLE in MODES 1, 2 and 3; during the movement of irradiated fuel assemblies in the secondary containment; during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRV). Appropriate ACTIONS and a Surveillance Requirement have been added.	3.7.4	N/A
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS			
M1	The RETS (Surveillance Requirement) requires the gross activity to be determined within 4 hours following an increase of greater than 50% (factoring out increases due to changes in thermal power level) in the nominal steady state fission gas release. In the ITS, this frequency has been changed to include an increase equivalent to 50%. This is an inconsequential change that is considered more restrictive since technically it increases the range of releases to be considered.	SR 3.7.5.1	RETS 3.5.a.2 (SR section)
M2	The RETS (Surveillance Requirement) allows the gross radioactivity rate of noble gases from the SJAE to be determined by sampling either at the discharge of the SJAE (prior to dilution and/or discharge) or at the recombiner discharge (prior to delay of the offgas to reduce the total radioactivity). The second sample point allowance is not being included in the ITS. The sample must be taken at the discharge of the SJAE, consistent with the LCO statement.	N/A	RETS 3.5.a (SR section)
3.7.6, MAIN TURBINE BYPASS SYSTEM			
M1	A new Specification requiring the Main Turbine Bypass System to be Operable has been added. The Specification requires the Main Turbine Bypass System to be Operable or LHGR and MCPR penalties to be applied. This Specification will help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting LHGR and MCPR if the event were to occur during power operation. Appropriate ACTIONS and Surveillance Requirements have also been added.	3.7.6	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL		
M1	The CTS requires the spent fuel storage pool level be maintained at a minimum level of 33 ft (equivalent to 17 feet above the top of irradiated fuel assemblies seated in the spent fuel storage racks). The ITS requires this level to be maintained at 21 ft 7 inches over the top of irradiated fuel assemblies seated in the spent fuel storage pool. This will ensure that the consequences of a refueling accident over the spent fuel pool storage pool will remain within the bounds of the refueling accident described in UFSAR, Section 14.6.1.4.	LCO 3.7.7, SR 3.7.7.1	3.10.C
M2	The CTS does not provide any specific actions when the LCO is not met. Therefore when the LCO is not met, CTS 3.0.C must be entered and the reactor placed in COLD SHUTDOWN within 24 hours. This shutdown requirement has been deleted as discussed in DOC L3 for this Specification and a more appropriate ACTION is provided. The ITS will immediately require the suspension of movement of irradiated fuel in the spent fuel pool; thus, an accident cannot occur.	3.7.7 ACTION A	3.1.0.C
	CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES		
NONE	NONE	NONE	NONE
	CTS 3/4.11.C, BATTERY ROOM VENTILATION		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC SOURCES - OPERATING		
M1	The CTS requires the LCO to be met prior to making the reactor critical, which effectively implies MODES 1 and 2. The ITS Applicability requires AC sources be OPERABLE in MODES 1, 2, and 3.	3.8.1 Applicability	3.9.A
M2	Six new Surveillance Requirements have been added. The ITS requires a) a verification that each day tank contains $\geq$ 327 gallons of fuel oil every 31 days; b) a check for and removal of accumulated water from each day tank every 31 days; c) a verification of automatic and manual transfer of plant power supply from the normal station service transformer to each offsite circuit every 24 months (note: only required if the offsite circuit is not energizing its respective 4.16 kV emergency bus); d) a verification that each EDG subsystem rejects a load greater than or equal to a load equivalent to one core spray pump every 24 months; e) a verification that each EDG pair operating within the power factor limit (except when grid conditions will not permit, and then as close to the limit as practicable) operates for $\geq$ 2 hours loaded from 105% to 110% of the continuous rating, and for 6 hours loaded from 90% to 100% of the continuous rating every 24 months; and f) a verification that the interval between each sequenced load block is greater than or equal to the minimum design interval every 24 months.	SR 3.8.1.4, SR 3.8.1.5, SR 3.8.1.7, SR 3.8.1.8, SR 3.8.1.11, SR 3.8.1.13	N/A
M3	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if the corresponding AC sources are not restored within the associated completion times. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.8.1 Required Action F.1	N/A
M4	The ITS includes additional actions to limit the time the LCO is not met. When an AC Source is inoperable, the ITS includes a second Completion Time of 21 days from the discovery of failure to meet the LCO, which imposes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO.	3.8.1 Required Actions A.3 and B.4	N/A
M5	Not used.	N/A	N/A
M6	Not used.	N/A	N/A
M7	The CTS requires a demonstration of the ability of each EDG subsystem to start, accelerate, and force parallel; however, no acceptance criteria are provided. The ITS requires the EDG subsystem also meet specific values for time, voltage and frequency.	SR 3.8.1.2	4.9.B.1
M8	The CTS requirement to load each EDG monthly does not restrict this test from being performed on more that one EDG subsystem at a time. The ITS includes a restriction on performing this test on more than one EDG at a time.	SR 3.8.1.3 Note 3	4.9.B.1

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M9	Two new 24 month Surveillances have been added. The ITS will require a) a verification that, on an actual or simulated loss of offsite power signal, the emergency bus is de-energized, load shedding occurs, and each EDG subsystem will auto-start from standby condition and properly energize and maintain energized the respective emergency buses/loads; and b) a verification that, on an actual or simulated ECCS initiation signal, each EDG subsystem will auto-start from standby condition and properly operate unloaded, and the emergency buses stay energized from offsite power and the loads properly auto-start.	SR 3.8.1.9, SR 3.8.1.10	N/A
M10	Not used.	N/A	N/A
M11	The CTS requires a demonstration of the ability, under required conditions (loss of power signal, ECCS initiation signal, loss of power signal in conjunction with ECCS signal), of each EDG subsystem to start, accelerate, force parallel and accept emergency loads in the prescribed sequence; however, no specific acceptance criteria is specified. The ITS requires the EDG subsystem meet specific values for time, voltage, frequency and loading duration.	SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.12	4.9.B.4
M12	A new 7 day Surveillance has been added to verify the offsite circuit breaker alignment and power availability.	SR 3.8.1.1	N/A
M13	The CTS does not specify which EDG fuel oil transfer pumps must be OPERABLE. The ITS will require each diesel generator to have at least one transfer pump capable to transfer oil from its corresponding storage tank to day tank automatically. If this requirement is not met the associated diesel generator must be declared inoperable. In addition, the CTS allows 30 days to restore an inoperable transfer pump. The ITS will require the EDG to be declared inoperable, thus 14 days will be allowed to restore an inoperable pump. In addition CTS 3.9.C.2.c has been deleted since the association between the fuel oil transfer system will now correspond to the associated EDG and not the EDG subsystem.	LCO 3.8.1, SR 3.8.1.6	3.9.C.2.b, 3.9.C.2.c 4.9.C.2
3.8.2, AC SOURCES - SHUTDOWN			
M1	The CTS does not specify what the one required offsite power source must be powering. The ITS specifies that offsite AC power sources must be available to supply power to all equipment required to be OPERABLE by ITS LCO 3.8.8. Thus the ITS LCO could require two offsite circuits if both class 1E AC electrical power distribution divisions are required.	LCO 3.8.2.a and b	3.9.D

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS does not specify what the one required EDG subsystem must be powering. The ITS specifies that the EDG subsystem must be capable of supplying power to one division of the equipment required to be OPERABLE by ITS LCO 3.8.8.	LCO 3.8.2.c	3.9.D
M3	The ITS adds a new Applicability of during movement of irradiated fuel assemblies in the secondary containment. This condition could include while being in MODE 1, 2, or 3, or when there is no fuel in the vessel.	3.8.2 Applicability	N/A
M4	Due to the addition of the new Applicability described in DOC M3 above, the ITS include a Note that states LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODES 4 or 5, LCO 3.0.3 is not applicable and would not specify any action. If moving irradiated fuel assemblies while in MODES 1, 2, or 3, the fuel movement is independent of reactor operations and the inability to suspend movement in accordance with the ITS 3.8.2 Required Actions would not be sufficient reason to require a reactor shutdown.	3.8.2 ACTIONS Note	N/A
M5	The CTS does not include any Surveillances for verifying the Operability of AC Sources during cold shutdown or refueling. The ITS includes appropriate Surveillances to ensure the Operability of the required AC sources.	SR 3.8.2.1	N/A
3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR			
M1	The CTS allows 48 hours to restore the fuel oil level to the 7 day limit, when a fuel oil tank is less than the 7 day limit. The ITS will allow the same 48 hours, but will only allow the time if the fuel oil level in the tank is greater than the six day limit. If the six day limit is not met or the 48 hours is exceeded, then the ITS will require the associated EDG to be declared inoperable. In addition, the ITS specifies the fuel oil limit on a per EDG basis versus the CTS method of on a per EDG subsystem basis.	3.8.3 Action A, 3.8.3 ACTION F, SR 3.8.3.1	3.9.C, 3.9.C.3
M2	New requirements are added to maintain a proper amount of lube oil inventory for EDG operation. Appropriate LCO requirements, ACTIONS, and a Surveillance Requirement have been added.	LCO 3.8.3, 3.8.3 ACTIONS B and F, SR 3.8.3.2	N/A
M3	In the ITS, the new and stored fuel oil properties are in a separate LCO, thus a new LCO statement is provided. In addition, a new Surveillance and attendant ACTIONS are provided to ensure the new and stored fuel oil properties are tested and maintained in accordance with the Diesel Fuel Oil Testing Program.	LCO 3.8.3, 3.8.3 ACTIONS C, D, and F, SR 3.8.3.3	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M4	The CTS includes the starting air as an attribute of the EDGs. In the ITS, the starting air requirements are in a separate LCO, thus a new LCO statement is provided. In addition, the proper ACTIONS for when starting air is inoperable has been added. Also, the CTS does not have a specific requirement for the starting air pressure. The ITS includes the proper starting air pressure needed to support EDG Operability.	LCO 3.8.3, 3.8.3 ACTIONS E and F, SR 3.8.3.4	4.9.B.2
	3.8.4, DC SOURCES - OPERATING		
M1	The CTS requires the LCO to be met prior to making the reactor critical, which effectively implies MODES 1 and 2. The ITS Applicability requires AC sources be OPERABLE in MODES 1, 2, and 3.	3.8.4 Applicability	3.9.E.1, 3.9.F.1
M2	The CTS allows 7 days total per calendar month to restore an inoperable 125 VDC battery. The ITS only allows 8 hours to restore an inoperable DC electrical power subsystem.	3.8.4 ACTION A	3.9.E.2
M3	The CTS requires a measurement of overall battery voltage; however, no acceptance criteria is provided. The ITS includes float voltage limitations for the 125 VDC and 419 VDC batteries.	SR 3.8.4.1	4.9.E.1, 4.9.F.1
M4	The CTS requires a 125 VDC battery charger performance test; however, no acceptance criteria is provided. The ITS includes the required current, voltage, and time duration of the 125 VDC battery charger performance test.	SR 3.8.4.2	4.9.E.6
M5	Not used.	N/A	N/A
M6	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if the inoperable DC source is not restored within the associated completion time. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.8.4 Required Action B.1	N/A
	3.8.5, DC SOURCES - SHUTDOWN		
M1	A new Specification is being added requiring one 125 VDC electric power subsystem to be operable and capable of supplying one division of the onsite Class 1E DC Electrical Power Distribution System required by proposed LCO 3.8.8, "Distribution Systems — Shutdown". Appropriate ACTIONS and a Surveillance Requirement have also been added.	3.8.5	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.6, BATTERY CELL PARAMETERS		
M1	The CTS requires that the reactor shall not be made critical unless both station batteries (including the battery cell parameters) and both LPCI MOV Independent Power Supplies (including the battery cell parameters) are in service, which effectively implies MODES 1 and 2. The ITS requires the battery cell parameters to be within limits when the associated DC electrical power subsystems are required to be Operable. Thus, the 125 VDC battery cell parameters are now required in MODES 1, 2, 3, 4, and 5, and during movement of irradiated fuel assemblies in the secondary containment, and the 419 VDC battery cell parameters are now required in MODES 1, 2, and 3.	3.8.6 Applicability	3.9.E.1, 3.9.F.1
M2	The CTS does not address requirements for a battery cell parameter not within limits. The ITS provides an ACTION for when one or more battery cell parameters are not within Category A or B limits.	3.8.6 ACTION A	N/A
M3	The CTS does not address requirements for a battery cell parameter not within limits. The ITS provides an ACTION for when the battery cell parameters of a battery cell not meeting Category A or B limits are not restored, one or more batteries with average electrolyte temperature of the representative cells not within limits, or one or more batteries with one or more battery cell parameters are not within Category C values.	3.8.6 ACTION B	N/A
M4	The ITS includes a new requirement to verify the electrolyte level of connected battery cells (pilot cells and all cells) meets the Category A and B limits. The pilot cells are checked weekly and all cells are checked quarterly.	SR 3.8.6.1, SR 3.8.6.2	N/A
M5	The ITS establishes electrolyte level, float voltage, and specific gravity limits for each pilot cell and each connected cell. Currently, no limits are specified in the CTS.	Table 3.8.6-1	N/A
M6	The CTS requires cell temperature to be measured; however, no specific acceptance criteria is provided. The ITS includes a specific limit for battery cell temperature.	SR 3.8.6.3	4.9.E.2.c, 4.9.F.2.c
	3.8.7, DISTRIBUTION SYSTEMS - OPERATING		
M1	The CTS requires the LCO to be met prior to making the reactor critical, which effectively implies MODES 1 and 2. The ITS Applicability requires AC sources be OPERABLE in MODES 1, 2, and 3.	3.8.7 Applicability	3.9.A, 3.9.E
M2	A new 7 day Surveillance Requirement has been added to verify correct breaker alignment and voltage to required AC and 125 VDC electrical power distribution subsystems.	SR 3.8.7.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	The CTS requires the reactor to be placed in cold shutdown (MODE 4) within 24 hours if an AC or DC distribution subsystem is inoperable. In the ITS, an intermediate condition, MODE 3, must be met within 12 hours.	3.8.7 Required Action C.1	N/A
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN			
M1	A new Specification is being added requiring the necessary portions of the AC and 125 VDC electrical power distribution subsystems to be Operable to support equipment required to be Operable. An appropriate ACTION and a Surveillance Requirement have also been added.	3.8.8	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, REFUELING EQUIPMENT INTERLOCKS		
M1	The CTS requires testing of refueling interlocks, but does not specify the actual interlocks by name. In the ITS, each actual refueling equipment interlock, by name, is listed in the Surveillance Requirement.	SR 3.9.1.1	4.10.A.1
	3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK		
M1	The CTS requires that the reactor mode switch be locked in the Refuel position during core alterations, but no Surveillance Requirement is provided to periodically verify this requirement. In the ITS. a new Surveillance Requirement will require verification every 12 hours that the mode switch remains locked in the "Refuel" position.	SR 3.9.2.1	N/A
M2	The CTS does not provide specific actions to take when the one-rod-out interlock is inoperable. In the ITS, a new ACTION requires the immediate suspension of control rod withdrawal and action to be immediately initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	3.9.2 ACTION A	N/A
	3.9.3, CONTROL ROD POSITION		
M1	The CTS requires that all control rods be inserted prior to loading fuel, but no Surveillance Requirement is provided to periodically verify this requirement. In the ITS, a new Surveillance Requirement will require verification that all control rods are fully inserted when loading fuel assemblies in the core every 12 hours.	SR 3.9.3.1	N/A
	3.9.4, CONTROL ROD POSITION INDICATION		
M1	A new Specification concerning Control Rod Position Indication is added. The new Specification will require that the control rod "full-in" position indication for each control rod be Operable when in MODE 5, which helps to ensure that safety analysis assumptions of UFSAR, Section 14.5.4.3, "Control Rod Removal Error During Refueling" and Section 14.5.4.4, "Fuel Assembly Insertion Error During Refueling" are satisfied. An appropriate ACTION and Surveillance Requirement are also added.	3.9.4	N/A
	3.9.5, CONTROL ROD OPERABILITY - REFUELING		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	A new Specification concerning Control Rod Operability during refueling is added. The new Specification will require that each withdrawn control rod must be Operable when in MODE 5, which helps ensure control rod scram capability exists and constitutes a more restrictive change. An appropriate ACTION and Surveillance Requirements are also added.	3.9.5	N/A
3.9.6, REACTOR PRESSURE VESSEL WATER LEVEL			
M1	A new Specification concerning reactor vessel water level is added. The new Specification requires that Reactor Pressure Vessel (RPV) water level be ≥ 22 ft 2 inches above the top of the RPV flange during the movement of fuel assemblies and control rods within the RPV flange, since this helps ensure that the doses at the site boundary will be within limits and constitutes a more restrictive change. An appropriate ACTION and Surveillance Requirement are also added.	3.9.6	N/A
3.9.7, RESIDUAL HEAT REMOVAL - HIGH WATER LEVEL			
M1	A new Specification for the RHR shutdown cooling (SDC) subsystem in MODE 5 is added. The new Specification requires that one RHR SDC subsystem be Operable in MODE 5 with water level ≥ 22 ft 2 inches above the top of the RPV flange. Appropriate ACTIONS and a Surveillance Requirement are also added.	3.9.7	N/A
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL			
M1	A new Specification for the RHR shutdown cooling (SDC) subsystems in MODE 5 is added. The new Specification requires that two RHR shutdown cooling subsystems be Operable in MODE 5 with water level < 22 ft 2 inches above the top of the RPV flange. Appropriate ACTIONS and a Surveillance Requirement are also added.	3.9.8	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION			
NONE	NONE	NONE	NONE
3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING			
NONE	NONE	NONE	NONE
3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN			
NONE	NONE	NONE	NONE
3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN			
NONE	NONE	NONE	NONE
3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING			
M1	The CTS allows two control rods to be withdrawn from the reactor for maintenance. The ITS allows only one control rod to be withdrawn and subsequently removed from a core cell containing one or more fuel assemblies. The number of control rods allowed to be withdrawn (with fuel assemblies not removed from around the control rod) has been reduced to one. The removal of more than one control rod will be controlled in accordance with ITS 3.10.6. In addition, since only one control rod may be withdrawn, the CTS separation criteria requirement has been deleted and the ITS includes a new requirement to have all other control rods fully inserted. In addition, a Surveillance Requirement has been added to verify all control rods, other than the control rod withdrawn for the removal of the associated CRD, are fully inserted every 24 hours.	LCO 3.10.5.a, SR 3.10.5.1	3.10.D.1
M2	The CTS requires the disarming of the control rods immediately facing and diagonally adjacent to the control rods to be withdrawn. The ITS increase this requirement to include all control rods in a 5 x 5 array centered on the withdrawn control rod. In addition, a Surveillance Requirement has been added to verify the specified control rods are disarmed every 24 hours.	LCO 3.10.5.b, SR 3.10.5.2	3.10.D.1.b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M3	Two new Surveillances have been added. ITS SR 3.10.5.3 will require the verification that a control rod block is inserted and ITS SR 3.10.5.5 will require that no other CORE ALTERATIONS are in progress every 24 hours.	SR 3.10.5.3, SR 3.10.5.5	N/A
M4	The CTS does not provide any actions of the LCO requirements are not met. The ITS includes an ACTION that will require the immediate suspension of the CRD mechanism removal and the immediate initiation of action to fully insert all control rods or to initiate immediate action to satisfy the requirements of this LCO.	3.10.5 ACTION A	N/A
3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING			
M1	The CTS requires the verification that the control cell contains no fuel before the corresponding control rod is withdrawn; however, no periodic frequency is required. The ITS requires the verification that the four fuel assemblies are removed from the core cells associated with each control rod or CRD removed at a surveillance frequency of 24 hours.	SR 3.10.6.1	4.10.A.2
M2	Two new Surveillance Requirements have been added. SR 3.10.6.2 requires verification every 24 hours that all other control rods in core cells containing one or more fuel assemblies to be fully inserted and SR 3.10.6.3 requires verification every 24 hours that fuel assemblies being loaded are in compliance with an approved spiral reload sequence. Currently, these Surveillances are not required in the CTS.	SR 3.10.6.2, SR 3.10.6.3	N/A
3.10.7, CONTROL ROD TESTING - OPERATING			
NONE	NONE	NONE	NONE
3.10.8, SHUTDOWN MARGIN TEST - REFUELING			
M1	The CTS does not require safety/relief valves (S/RVs) to be Operable during reactor operator training with the reactor coolant temperature ≤ 212°F and with the reactor vessel vented (MODE 4) or with the reactor vessel head removed (MODE 5). In addition, the CTS does not require the Containment Cooling Mode of the RHR System to be Operable with reactor coolant temperature ≤ 212°F. These exceptions to the current operability requirements are not included in the ITS.	N/A	3.6.E.3, 3.5.B.5

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M2	The CTS does not require safety/relief valves to be Operable during low power physics testing with the reactor coolant temperature $\leq$ 212°F and with the reactor vessel vented. The current Applicability is considered to be MODE 4 in the ITS however there is no requirement to have the reactor vessel vented (see Discussion of Changes for ITS Chapter 1.0). This exception to allow this testing in MODE 4 is not included in the ITS.	N/A	3.6.E.3
M3	The CTS does not require safety/relief valves to be Operable during low power physics tests. In addition, the CTS does not require components of the Containment Cooling Mode of the RHR System. Currently, there are no specific requirements to perform a low power physics tests in the CTS other than shutdown margin demonstrations in CTS 4.3.A.1. Low power physics tests were completed during the startup test program. ITS 3.10.8 allows the performance of a SDM test during MODE 5 with the reactor mode switch in the startup/hot standby position. Since SDM tests are considered the only low power physics tests permitted by the ITS, this change is considered more restrictive since a License Amendment must be processed prior to the performance of any specified low power physics test.	N/A	3.6.E.3, 3.5.B.5
M4	The CTS requires all operable control rods to be inserted within four hours when the requirements of the APRM Neutron Flux-Startup or APRM Inoperative function are not met. The ITS requires the reactor mode switch to be placed in the shutdown or refuel position immediately.	3.10.8 ACTION B	Table 3.1-1 Note 3.A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The CTS defines the exclusion area boundary to be approximately a 3,200 ft. radius corresponding to the closest distance from the reactor building, with the exception of the lake shoreline, to the exclusion area boundary consistent with 10 CFR 100.3. The ITS specifies that the Site and the Exclusion Area Boundaries are as shown in Figure 4.1-1, which expands the dimensions of the Exclusion Area. The area shown in ITS Figure 4.1-1 is consistent with: CTS RETS Definition 1.0.L, of the Site Boundary, which refers to CTS RETS Figure 5.1-1 for a map of the Site Boundary; UFSAR Section 2.1.1 which states that exclusion distances for the NMP-JAF site are approximately 3000 ft to the east, over a mile to the west, and about one and one-half miles to the southern site boundary; and the James A. FitzPatrick Emergency Plan which explicitly identifies the Exclusion Area as the Entergy and NMPC property surrounding the Protected Area in which the licensee has the authority to determine all activities including exclusion or removal of personnel and property from the area, all of which correspond to the combined site boundary for the James A. FitzPatrick-Nine Mile Point site.	4.1.1	5.1.2, RETS 1.0.L, RETS Figure 5.1-1
M2	The CTS does not currently describe the Low Population Zone. The ITS includes the Specification for the Low Population Zone (LPZ), which is identified as a 4 mile radius around the Nine Mile Point Nuclear Station Unit 1 stack.	4.1.2	N/A
M3	The CTS does not identify the elevation, for the minimum water level, to which the spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining. The ITS includes the Specification, which identifies the minimum design elevation, 344 feet 6 inches, to which the spent fuel storage pool can be drained with the gates not installed (which is the normal condition of the spent fuel storage pool during refueling operations). At the minimum design elevation, the fuel will remain covered as required by Regulatory Guide 1.13, Revision 1.	4.3.2	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, RESPONSIBILITY		
M1	Not used.	N/A	N/A
M2	The ITS adds a requirement that the plant manager or his designee approve each proposed test, experiment, and modification to systems or equipment that affect nuclear safety prior to implementation.	5.1.1	N/A
M3	ITS 5.1.2 has been added to require that the shift supervisor be responsible for the control room command function, and that in the absence of the shift supervisor from the control room, an individual with an active SRO license be designated to assume the control room command function when the plant is in MODE 1, 2, or 3. An individual with an active SRO license or RO license can be designated to assume the control room command function when the plant is in MODE 4 or 5.	5.1.2	N/A
	5.2, ORGANIZATION		
M1	The CTS allows up to 2 hours to restore the shift crew to the minimum complement in the event of illness or unexpected absence. The ITS allows the same amount of time (2 hours), however immediate action must be taken to restore the shift crew composition to within the minimum requirements.	5.2.2.b, 5.2.2.c	6.2.2.4
	5.3, PLANT STAFF QUALIFICATIONS		
NONE	NONE	NONE	NONE
	5.4, PROCEDURES		
M1	Two classifications of procedures are added to the ITS which, although currently exist, are not required by the current Technical Specifications. The ITS requires establishing, implementing and maintaining a) emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33, and b) all programs specified in ITS 5.5.	5.4.1.b, 5.4.1.e	N/A
	5.5, PROGRAMS AND MANUALS		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M1	The ITS adds a requirement that the ODCM shall become effective only after approval of the plant manager.	5.5.1.c.2	N/A
M2	New testing requirements for the filter trains (SGT and CREVAS Systems) are being added. The ITS adds the following new requirements: a) (SGT only) filter train heater testing be in accordance with ANSI N510-1975, which includes a new requirement that each phase current be within 5% of one another; b) (SGT only) the new condition following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system is being added to the filter efficiency testing; c) (SGT only) to demonstrate particulate filter efficiency in accordance with Sections C.5.a and C.5.c of Regulatory Guide 1.52, Rev 2, and at a flow rate of 5400 to 6600 scfm; d) (SGT only) to demonstrate charcoal filter removal efficiency in accordance with Sections C.5.a and C.5.d of Regulatory Guide 1.52, Rev 2, and at a flow rate of 5400 to 6600 scfm; e) (CREVAS only) the requirement for the pressure drop across the filter system to be less than 5.8 inches of water at a system flowrate of 900 to 1100 scfm; f) (CREVAS only) the new conditions; after each complete or partial replacement of the HEPA filter, after any structural maintenance on the HEPA filter housing that could affect the filter system efficiency, and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system are being added to the HEPA filter efficiency testing; g) (CREVAS only) to demonstrate the di-octylphtalate test for particulate filter efficiency for particulate greater than 0.3 micron in accordance with Sections C.5.a and C.5.c of Regulatory Guide 1.52, Rev 2, and at a flow rate of 900 to 1100 scfm; h) (CREVAS only) the new conditions; after each complete or partial replacement of the charcoal adsorber filter; after removal of a charcoal adsorber sample; after any structural maintenance on the charcoal adsorber housing that could affect the filter system efficiency, and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system are being added to the charcoal adsorber filter efficiency testing; and i) (CREVAS only) to demonstrate charcoal filter halogen removal efficiency in accordance with Sections C.5.a and C.5.d of Regulatory Guide 1.52, Rev 2, and at a flow rate of 900 to 1100 scfm.	5.5.8, 5.5.8.a, 5.5.8.b, 5.5.8.d, 5.5.8.e	4.7.B.1.a.2, 4.7.B.1.b, 4.7.B.1.b.1, 4.7.B.1.b.2, 4.11.A.1.a, 4.11.A.1.b, 4.11.A.1.c
M3	ITS 5.5.10, "Diesel Fuel Oil Testing Program," which establishes testing and sampling requirements, and acceptance criteria, in accordance with ASTM Standards, for both stored fuel oil and new fuel oil, is being added. ITS 5.5.10 establishes additional requirements relative to new fuel oil testing and to determine that particulate concentration for diesel fuel oil is $\leq$ 10 mg/l every 31 days.	5.5.10	N/A
M4	ITS 5.5.11, "Technical Specifications (TS) Bases Control Program," is added. This Program provides a controlled mechanism for processing changes to the Bases of the Technical Specifications.	5.5.11	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M5	ITS 5.5.12, "Safety Function Determination Program (SFDP)," is added. This program ensures that any loss of safety function is detected and that appropriate actions are taken.	5.5.12	N/A
M6	New requirements concerning the ODCM are added. The ITS specifies that the ODCM will contain radioactive effluent controls and radiological environmental monitoring activities and descriptions of information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release reports. In addition expanded requirements of the ODCM identify monitoring activities and report requirements, and establish content and format for documenting licensee-initiated changes.	5.5.1	N/A
M7	The ITS, specifies that the systems covered by the Primary Coolant Sources Outside Containment Program are Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling and Standby Gas Treatment. Currently, the actual systems are not specified.	5.5.2	Facility Operating License 2.C.4
5.6, REPORTING REQUIREMENTS			
M1	The CTS requires submittal of an Annual Occupational Exposure Tabulation on an annual basis. The ITS requires that an Occupational Radiation Exposure Report be submitted by April 30 of each year. This change adopts a specific date for submittal of a report.	5.6.1	6.9.A.2.a
M2	The CTS requires that the Monthly Operating Report should be submitted by the 15th of each month. The ITS changes the word "should" to "shall."	5.6.4	6.9.A.3
5.7, HIGH RADIATION AREA			
NONE	NONE	NONE	NONE
CTS 6.0, ADMINISTRATIVE CONTROLS			
NONE	NONE	NONE	NONE
RETS 2.1, LIQUID EFFLUENT MONITORS			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
RETS 2.2, CONCENTRATION OF LIQUID EFFLUENTS			
NONE	NONE	NONE	NONE
RETS 2.3, DOSE FROM LIQUID EFFLUENTS			
NONE	NONE	NONE	NONE
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS			
NONE	NONE	NONE	NONE
RETS 3.1, GASEOUS EFFLUENT MONITORS			
NONE	NONE	NONE	NONE
RETS 3.2, GASEOUS DOSE RATES			
NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES			
NONE	NONE	NONE	NONE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM			
NONE	NONE	NONE	NONE
RETS 5.0, TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLES			
NONE	NONE	NONE	NONE
RETS 6.1, MONITORING PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.2, LAND USE CENSUS PROGRAM			
NONE	NONE	NONE	NONE
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM			
NONE	NONE	NONE	NONE