ATTACHMENT 4

Table L - Less Restrictive Changes Matrix

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The definition of Core Alteration is revised so that the term will only apply to those activities that create the potential for a reactivity excursion and warrant special precautions or controls. Currently, a Core Alteration is defined as "the act of moving any component in the region above the core support plate, below the upper grid and within the shroud." The normal control rod movement (using the control rod hydraulic system) and the movement of in-core instrumentation are specifically exempted from the definition. The ITS definition for CORE ALTERATIONS will only apply to those activities that affect reactivity within the reactor vessel with the head removed and fuel in the vessel. Specifically, under the revised definition, in-vessel movement of instruments, cameras, lights, tools, etc., will not be classified as CORE ALTERATIONS. It should also be noted that control rod movement is not considered a CORE ALTERATION provided there are no fuel assemblies in the associated core cell. In addition, the proposed definition has also been modified by providing an allowance that the suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.	CORE ALTERATIONS definition	1.0.B	1
L2	The specific contact numbers in the definitions of Primary Containment Isolation Actuation Instrumentation Response Time and Reactor Protection System Response Time are deleted.	N/A	1.0.F.6, 1.0.F.10	3
L3	The CTS definition of Instrument Channel Functional Test requires the injection of a simulated signal into the instrument. The words "or actual" in reference to the injected signal, have been included in the ITS definition of CHANNEL FUNCTIONAL TEST. Some CHANNEL FUNCTIONAL TESTS can be performed by insertion of the actual signal into the logic (e.g., rod block interlocks). For others, there is no reason why an actual signal would preclude satisfactory performance of the test. Use of an actual signal instead of the existing requirement, which limits use to a simulated signal, will not affect the performance of the channel. OPERABILITY can be adequately demonstrated in either case since the channel itself cannot discriminate between "actual" or "simulated".	CHANNEL FUNCTIONAL TEST definition	1.0.F.5	3
L4	The CTS definition of Instrument Channel Functional Test requires, the injection of a simulated signal "into the instrument primary sensor where possible." This requirement has been changed in the ITS definition of CHANNEL FUNCTIONAL TEST to allow the signal to be injected "as close to the sensor as practicable."	CHANNEL FUNCTIONAL TEST definition	1.0.F.5	3
L5	The CTS definition of Cold Shutdown requires the reactor vessel to be vented. The ITS definition of MODE 4 does not include this requirement.	Table 1.1-1	1.0.I.3.b	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The power transient safety limit has been deleted since failure to meet this safety limit does not necessarily indicate that an actual safety limit has been exceeded.	N/A	1.1.C	1
L2	The reactor vessel water level safety limit is being reduced by 12 inches.	2.1.1.3	1.1.D	1
L3	The time to report a safety limit violation to the NRC has been extended from immediately to 1 hour, in accordance with 10 CFR 50.72. In addition, since the requirement is covered by 10 CFR 50.72, it is not included in the ITS.	N/A	6.7.(B)	6, 9
L4	The Safety Limit Applicability at low power or low flow is changed from reactor pressure ≤ 785 psig or core flow ≤ 10% of rated to reactor pressure < 785 psig or core flow < 10% of rated. The Applicability for the MCPR Safety Limit is relaxed from reactor pressure > 785 psig and core flow > 10% of rated to reactor pressure ≥ 785 psig and core flow ≥ 10% of rated.	2.1.1.1, 2.1.1.2	1.1.A, 1.1.B	2
L5	The Shutdown Cooling Safety Limit is being deleted since it is covered by the Shutdown Cooling System Isolation Reactor Pressure - High instrumentation Allowable Value.	3.3.6.1 Function 6.a	1.2.2	1

CHANGE TYPE

1. Relaxation of LCO Requirement
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4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the unit to 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 Specification. The ITS allows 37 hours to be in MODE 4.	LCO 3.0.3	3.0.C	6
L2	The CTS has had the following sentence added, "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance." The ITS includes this statement to provide the consistency in scheduling flexibility for all performances of periodic requirements, whether they are Surveillances or Required Actions. The intent remains to perform the activity, on the average, once during each specified interval.	SR 3.0.2	4.0.B	6
L3	When it is determined that a Surveillance was not performed, the CTS allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage time limits of the ACTION requirements are less than 24 hours. The ITS continues to allow a delay, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance Frequency, whichever is greater. This change allows the delay to apply to any Surveillance, instead of just those specifications with ACTION requirements of less than 24 hours.	SR 3.0.3	4.0.C	3
L4	The CTS allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage times of the ACTION requirements are less than 24 hours. The ITS allows an increase in the delay time of up to the limit of the specified Surveillance Frequency. However, a delay of greater than 24 hours is only allowed provided a risk evaluation is performed and the risk impact of delaying the Surveillance is managed.	SR 3.0.3	4.0.C	3

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
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4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time

7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.1, SHUTDOWN MARGIN			
NONE	NONE	NONE	NONE	NONE
	3.1.2, REACTIVITY ANOMALIES			
L1	The CTS does not provide an explicit restoration time when Reactivity Anomalies is not met. The ITS provides a Completion Time of 72 hours for the core reactivity difference to be restored to within limits (normally required to perform an analysis to determine the reason for the reactivity difference).	3.1.2 ACTION A	3.3.D	6
L2	The CTS requirement to be in a cold condition within 24 hours if the reactivity anomaly requirement is not met is being deleted, since the CTS Applicability for this Specification is only power operation (and CTS 3.0.A only requires the ACTIONS to be met during the LCOs Applicability).	N/A	3.3.E	5
L3	The CTS requires the shutdown margin to be verified within limits every full power month (approximately 708 MWD/T). In the ITS, the Frequency has been changed to every "1000 MWD/T during operations in MODE 1" after the first performance (the first performance requirement is described in DOC M3).	SR 3.1.2.1	4.3.D	3
	3.1.3, CONTROL ROD OPERABILITY			
L1	Currently in the CTS, a stuck control rod (not fully inserted) that may be stuck as a result of a collet housing failure or for some other reason requires that the reactor be in a cold shutdown condition within 24 hours. No allowance is provided for repair prior to entering the shutdown statement. The ITS allows continued operation with a stuck control rod and the requirement to be in Cold Shutdown has been deleted. With a single withdrawn control rod stuck, the remaining Operable control rods are capable of providing the required scram and shutdown reactivity. In addition, to ensure that local scram reactivity assumptions are maintained in this condition, stuck control rod separation criteria must be verified immediately and the stuck control rod must be disarmed within 2 hours to prevent damaging the control rod drive.	3.1.3 ACTION A	3.3.A.2.a	4, 5
L2	The existing CTS surveillance requires that all partially or fully withdrawn control rods be exercised at least once per week. The ITS Surveillances will differentiate between fully and partially withdrawn rods. Fully withdrawn rods will still be exercised once per 7 days. However, partially withdrawn rods will be exercised once per 31 days.	SR 3.1.3.2 SR 3.1.3.3	4.3.A.2.a	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	Currently in the CTS, if three or more control rods are inoperable but not stuck, all operable control rods must be exercised once every 24 hours. The ITS requirement for control rods that are inoperable but not stuck is to fully insert and disarm the inoperable rod(s). There will be no requirement to exercise the operable rods to verify their operability other than the normal surveillance requirements.	3.1.3 Required Actions C.1 and C.2	4.3.A.2.a	3
L4	Currently in the CTS, if one or more control rods are stuck, all operable control rods must be exercised "at least every 24 hours." In the ITS, after discovery of a stuck rod, all withdrawn control rods are required to be exercised only once within 24 hours when Thermal Power is greater than the low power setpoint of the RWM.	3.1.3 Required Action A.3	4.3.A.2.a	3
L5	The CTS requirement for the CRD housing support to be in place has been deleted since it is included in the Operability requirements for control rods in the ITS.	LCO 3.1.3	3/4.3.B.2	1
L6	CTS 3.3.A.2.a requires the plant to be brought to Cold Shutdown within 24 hours when the requirements for "Inoperable Control Rods" cannot be met. This implies the Applicability of CTS 3.3.A.2.a to be Modes 1, 2 and 3. The Applicability in ITS 3.1.3 is Modes 1 and 2 and the default condition has been changed to Mode 3 as reflected in ITS 3.1.3 Required Actions B.1 and E.1.	3.1.3 Applicability, 3.1.3 Required Actions B.1 and E.1	3.3.A.2.a	2, 5
	3.1.4, CONTROL ROD SCRAM TIMES			
L1	The CTS requires that 10% of the operable control rods be scram time tested at "16 week intervals." This 16 week interval equates to 112 days. The ITS Frequency for scram time testing a representative sample of control rods is "120 days cumulative operation in MODE 1." Thus, during plant operation the frequency is being extended for 8 days.	SR 3.1.4.2	4.3.C.2	3
L2	The CTS requires an evaluation to be made, whenever scram time surveillances are performed, to provide reasonable assurance that proper control rod drive performance is being maintained. This requirement is essentially a performance tracking requirement to help ensure control rod scram times are maintained within limits and is deleted.	N/A	4.3.C.2	3
L3	The CTS requirement to be in a cold condition within 24 hours when the Scram Insertion Times are not met is being deleted. A new requirement to be in MODE 3 in 12 hours has been added, as described in DOC M5. This action will place the plant outside the Applicability of CTS 3.3.C.1 (reactor power operation).	N/A	3.3.E	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requirement to perform scram time testing at saturation temperatures has been deleted. This change will allow scram time testing to be performed during reactor hydrostatic pressure testing when the reactor vessel is not at saturated conditions.	N/A	4.3.C.1	3
3.1.5, CONTROL ROD SCRAM ACCUMULATORS				
L1	The CTS requires control rods with inoperable accumulators be considered inoperable immediately. The ITS allows a short out of service time (up to 8 hours, depending upon the number of inoperable accumulators and the reactor pressure) for the accumulators prior to declaring the associated control rods inoperable. In addition, the option to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient is also added. The option for declaring the control rod with an inoperable accumulator "slow" is restricted to control rods not previously known to be slow.	3.1.5 ACTIONS A, B, C, and D	3.3.A.2.d	4
L2	The CTS requires a check of the status of the pressure and level alarms for each control rod scram accumulator once per week. This requirement has been deleted. The ITS does include a requirement to verify accumulator pressure is within limits as described in DOC M1.	N/A	4.3.A.2.c	3
3.1.6, ROD PATTERN CONTROL				
L1	The CTS requires all rod movement to be stopped except by scram if control rod patterns and sequence of withdrawal or insertion limits are not established such that the control rod drop accident limit of 280 cal/g is not exceeded. The ITS requires associated control rod(s) to be moved to the correct position or declared inoperable within 8 hours if one or more control rods is not in compliance with BPWS. However, the number of OPERABLE control rods not in compliance with the prescribed sequence is limited to 8, to prevent the operator from attempting to correct a control rod pattern that significantly deviates from the prescribed sequence. In addition, any of the 8 control rods that cannot be restored to its correct position within 8 hours must then be declared inoperable and fully inserted within 3 hours.	3.1.6 ACTIONS A and B	3.3.B.3.f	4
3.1.7, STANDBY LIQUID CONTROL SYSTEM				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	CTS requires that the Standby Liquid Control System be Operable during a period when fuel is in the reactor and prior to startup from cold condition. The current Applicability corresponds to MODES 1, 2 and can also imply MODES 3, 4 and 5 with any control rod withdrawn. This system need not be Operable when the reactor is in the cold condition, control rods are fully inserted and CTS 3.3.A (Reactivity Limitations) is met. Therefore, the ITS Applicability is only MODES 1 and 2.	3.1.7 Applicability	3.4.A	2
L2	The CTS includes an action to restore certain components (e.g., tank heaters) or variables (e.g., sodium pentaborate volume-concentration and temperature requirements) within 8 hours or take action to be in hot shutdown in the next 12 hours. All the components or variables discussed in this CTS action will cause both subsystems of the SLC System to be inoperable. However, the list is not all inclusive of the possible events which could lead to both subsystems being inoperable. The ITS adds an ACTION to allow the entire SLC System (e.g., both pumps) to be inoperable for any reason up to 8 hours prior to requiring a plant shutdown. The 8 hours provides time to restore minor problems (e.g., some pump inoperabilities) prior to requiring a plant shutdown.	3.1.7 ACTION B	3.4.C	5
L3	The CTS requires that when a SLC subsystem or component becomes inoperable, the redundant subsystem or component be verified to be OPERABLE immediately and daily thereafter. The ITS does not have this cross system check. This change will allow credit to be taken for normal periodic Surveillances as a verification of OPERABILITY and availability of the remaining SLC subsystem.	N/A	4.4.B	4
L4	The CTS requires that each SLC subsystem "valve (manual, power operated, or automatic) in the system flowpath that is not locked, sealed or otherwise secured in position, is in the correct position" once per 31 days. The ITS requires that "each SLC subsystem manual valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position, or can be aligned to the correct position" every 31 days. The proposed change permits the SLC subsystem to be considered OPERABLE as long as the valves can be manually realigned to their correct position.	SR 3.1.7.6	4.4.A.1	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	The CTS requires that every 24 months demineralized water be injected into the reactor vessel to test that valves (except explosive valves) not checked by the recirculation test are not clogged. This test involves testing entire subsystems; including portions common to both subsystems as well as non-common portions. As such, testing either subsystem can satisfy the necessary testing for the common portions of both subsystems. To accomplish this, the ITS requires the verification of flow through one SLC subsystem from the pump into the reactor pressure vessel every 24 months on a STAGGERED TEST BASIS (i.e., such that the subsystems used for the test are alternated each 24 months). Since the CTS could be inferred to require testing both subsystems each 24 months, this change is a relaxation in the frequency of testing an individual subsystem (i.e., on the Staggered Test Basis). In addition, the CTS requries replacing both primer assemblies every 24 months. The ITS will only require replacing one primer assembly every 24 months; the one that has been fired during performance of the flow test. Over the course of two surveillance intervals (48 months), both primer assemblies will be required to be replaced.	SR 3.1.7.8	4.4.A.4, 4.4.A.5	3
	3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES			
L1	CTS 4.3.A.2.b, CTS 4.3.A.2.e and CTS 4.3.C.3 include requirements for SDV vent and drain valves. These requirements are currently associated with control rod operability. The default action for CTS 4.3.A.2.b and 4.3.A.2.e is to be in Hot Shutdown (Mode 3) in 12 hours (CTS 3.3.A.2.e.2), while the default action for CTS 4.3.C.3 is to be in a cold condition within 24 hours (CTS 3.3.E). These default actions are not consistent. In the ITS, all the requirements for SDV vent and drain valves are included in one Specification for consistency. In the ITS, the SDV vent and drain valves are only required to be Operable in MODES 1 and 2. In MODES 1 and 2, a scram may be required; therefore the SDV vent and drain valves must be Operable. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied.	3.1.8 Applicability and ACTION C	3.3.A.2.e.2, 3.3.E, 4.3.A.2.b, 4.3.A.2.e, 4.3.C.3	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	The CTS contains Surveillance Requirements for SDV vent and drain valves but the CTS do not provide specific actions if SDV vent and drain valves are inoperable (other than to shut the plant down). The primary safety function of the SDV vent and drain valves is to isolate the SDV during a scram to contain the reactor coolant leakage past the CRD seals. This isolation function can be satisfied with only one valve OPERABLE in each line or the line is isolated. Therefore, the ITS provides actions to: a) Allow 7 days to isolate an inoperable SDV vent or drain valve provided at least one valve in each line is Operable; b) Establish an 8 hour limit when both valves in a line are inoperable and, allowing the option of isolating the line during this time; c) Require the plant to be placed in MODE 3 in 12 hours if any Required Action and associated Completion Time is not met (see DOC L1); d) Recognize that the SDV vent and drain valves are normally open to prevent accumulation of water in the SDV from leakage. Therefore, a Note is added to the ITS ACTIONS, allowing periodic opening of the affected line for draining and venting of the SDV; and e) Provide a Note at the start of the ACTIONS Table (Separate Condition entry is allowed for each SDV vent and drain line) to provide more explicit instructions for proper application of the Actions for ITS 1.3, "Completion Times." Each SDV line is tested independently and allowed a specified period of time to confirm it isolated or capable of isolation, or restore the complete function of the line.	3.1.8 ACTIONS A, B, and C, 3.1.8 ACTIONS Notes 1 and 2	4.3.A.2.b, 4.3.A.2.e, 4.3.C.3	5

CHANGE TYPE

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5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE	NONE
	3.2.2, MINIMUM CRITICAL POWER RATIO			
L1	The CTS requires that MCPR be determined following any change in power level or distribution that would cause operation with a limiting control rod pattern as described in the Bases for Specification 3.3.B.5. The proposed change deletes this Surveillance Frequency, but retains the 24 hour Surveillance Frequency for determining the MCPR value. Since operation with a limiting control rod pattern is, in this case, operating on the operating limit MCPR, the condition is extremely unlikely and the Surveillance would seldom be required.	N/A	4.1.C	3
	3.2.3, LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE	NONE
	3.2.4, APRM GAIN AND SETPOINT			
L1	CTS 4.1.B includes a daily surveillance requirement to determine MFLPD whenever reactor power is ≥ 25% RTP and to make any necessary adjustments to APRM high flux scram trip settings. When the surveillance is not met CTS 3.0.C must be entered and the plant must be in COLD SHUTDOWN within 24 hours since there is no specific LCO or action for not meeting CTS 4.1.B. ITS LCO 3.2.4 and ACTIONS A and B have been added to the current requirements in CTS 4.1.B. The requirements of ITS LCO 3.2.4 are consistent with the requirements in CTS 4.1.B (except as modified by DOCs A3, M1 and R1). ACTION A will allow 6 hours to satisfy the requirements of LCO 3.2.4. If this Required Action and associated Completion Time can not be met, ACTION B will require a reduction in power to < 25% RTP within 4 hours.	LCO 3.2.4, ACTIONS A and B	4.1.B, 3.0.C	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

CHANGE TYPE

1. Relaxation of LCO Requirement
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5. Relaxation of Required Actions to Exit Applicability
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TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.1.1, RPS INSTRUMENTATION			
L1	The CTS Applicability of Mode 5 (i.e., reactor is subcritical, fuel is in the vessel and the reactor temperature is less than 212 °F) for the Mode Switch in Shutdown, Manual Scram, and IRM High Flux Trip Functions and the CTS Applicability of Mode 5 for the IRM Inoperative Function, is being relaxed. In the ITS, the above Functions are only required to be Operable in Mode 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	Table 3.3.1.1-1 for Functions 1.a, 1.b, 10, and 11	Table 3.1-1 Trip Functions 1, 2, 3, and 4, including Note 7	2
L2	The CTS provides 4 hours to reach Mode 3 (all rods inserted). In the ITS, the time to reach Mode 3 is 12 hours.	3.3.1.1 Required Action G.1	Table 3.1-1 Note 3.A	6
L3	The CTS (for Mode Switch in Shutdown, Manual Scram, IRM High Flux, IRM Inoperative, and High Water Level in Scram Discharge Volume Functions) requires the insertion of all operable control rods if the channels are not restored or tripped within the allowed completion times. In the ITS, when in MODE 5, only control rods in core cells containing one or more fuel assemblies are required to be inserted.	3.3.1.1 Required Action H.1	Table 3.1-1 Note 3.A	4
L4	The CTS requires the APRM Neutron Flux - Startup and APRM Inoperative Functions to be Operable in MODE 5. The ITS does not require these Functions during Mode 5 operations.	N/A	Table 3.1-1 Trip Functions 5 and 8, including Note 7, 2.1.A.1.b	2
L5	The CTS requirement associated with the Main Steam Isolation Valve Closure Function to insert all Operable control rods (be in MODE 3) within 4 hours is being relaxed. The ITS will require the plant to be in MODE 2 within 6 hours when the Main Steam Isolation Valve Closure Function is inoperable and not restored, or channels tripped, within the required Completion Times, consistent with the Applicability.	3.3.1.1 Required Action F.1	Table 3.1-1 Note 3.A	4
L6	The design details that identify the reliability group (A, B or C) to which each instrument belongs for functional testing has not been included in the ITS.	N/A	Table 4.1-1 (including Note 6), Table 4.1-2 (including Note 1)	3
L7	The details that identify those portions of the instrument channel which require functional testing and the details that identify the type of test equipment used to perform a channel calibration have been deleted.	N/A	Table 4.1-1	3
L8	The details concerning testing the automatic scram contactors after maintenance is not included in the ITS since it is adequately covered by SR 3.0.1.	SR 3.0.1	Table 4.1-1 Note 1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L9	Not used.	N/A	N/A	N/A
L10	The ITS includes a Note to allow entry into Mode 2 from Mode 1 for up to 12 hours prior to requiring the Channel Functional Test to be performed on the IRM High Flux, IRM Inop, and APRM Neutron Flux - High (Startup) Functions.	SR 3.3.1.1.3 Note	N/A	3
L11	The details relating to the Instrument I.D. numbers for the RPS Instrumentation are not included in the ITS.	N/A	4.1.A	3
L12	The ITS includes a Note that states the APRM heat balance calibration Surveillance is not required to be performed until 12 hours after Thermal Power ≥ 25% RTP.	SR 3.3.1.1.2 Note	N/A	3
L13	The CTS Frequency for performing the APRM heat balance calibration is being changed from once per day in the CTS to once per 7 days in the ITS.	SR 3.3.1.1.2	Table 4.1-2 Calibration requirement for Instrument Channel 2	3
L14	The Trip Settings/Trip Level Settings (changed to Allowable Value in DOC A19) are being changed a) for the Turbine Stop Valve Closure Function from ≤ 10% valve closure in the CTS to ≤ 15% valve closure in the ITS; and b) for the Turbine Control Valve Fast Closure Function from > 500 psig and < 850 psig in the CTS to ≥ 500 psig and ≤ 850 psig in the ITS.	Table 3.3.1.1-1 Allowable Values for Functions 8 and 9	2.1.A.3, 2.1.A.4, Table 3.1-1 Trip Level Setting for Trip Functions 14 and 15	1
3.3.1.2, SRM INSTRUMENTATION				
L1	The CTS does not provide any actions if the required SRMs are inoperable in Mode 2; thus a shutdown to cold shutdown is required. In the ITS, 4 hours will be allowed to restore the 3 required SRM channels to Operable prior to requiring a shutdown. Also, when there are no Operable SRMs, the ITS will further require suspension of all control rod withdrawal (and continue to allow the 4 hours to restore the inoperable SRMs).	3.3.1.2 ACTIONS A and B	N/A	5
L2	The CTS requires two SRMs to be Operable; one in the core quadrant where fuel or control rods are being moved and one in an adjacent quadrant. If a spiral offload or spiral reload is being performed, the ITS will allow only 1 SRM to be Operable, provided that the fueled region includes only that SRM detector. An appropriate SR has been added to ensure this condition, and a Note included to allow one SRM to satisfy multiple location requirements.	Table 3.3.1.2-1 footnote (b), SR 3.3.1.2.2.a, SR 3.3.1.2.2 Note 2	3.10.B	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS requires SRM operability to be verified during spiral reload by using a portable external source every 12 hours until the required amount of fuel is loaded to maintain 3 cps. An alternative is provided to load a maximum of four fuel assemblies in different cells containing control blades around each SRM to obtain the required 3 cps. The ITS includes a Note that relaxes the 3 cps requirement with less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies in the associated core quadrant.	SR 3.3.1.2.4 Note	3.10.B.4	3
L4	With the SRM requirements not met, the CTS requires a shutdown to cold shutdown (Mode 4). In the ITS, a shutdown only to Mode 3 is required.	3.3.1.2 Required Action C.1	LCO 3.0.C	5
	3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION			
L1	The requirements when one RBM channel is inoperable concerning verifying operations are not on a limiting control rod pattern or if not, then ensuring control rod withdrawal is blocked, when one RBM channel is inoperable have been deleted.	N/A	Table 3.2-3 Note 2 Action B.a), 3.3.B.5	5
L2	The CTS requirement to perform an instrument check on the RBM - Upscale and - Downscale Functions has been deleted.	N/A	Table 4.2-3 Instrument Check requirements for Instrument Channels 6 and 7	3
L3	The CTS requires a demonstration of the rod block function of the RWM (i.e., a Channel Functional Test) be performed during a startup prior to the start of control rod withdrawal. In the ITS, the Frequency for the RWM Channel Functional Test is specified as 92 days. Thus if two startups are performed within 92 days of each other, a test prior to the second startup will not be required. In addition, a Note to the ITS Surveillance allows the test to be performed up to 1 hour after withdrawal of the first control rod.	SR 3.3.2.1.2	4.3.B.3.a.(4)	3
L4	The Frequency to verify the correctness of the RWM program sequence during startup prior to the start of control rod withdrawal and during shutdown prior to attaining 10% rated power during rod insertion has been changed in the ITS to require the verification only prior to declaring RWM OPERABLE following loading of the Sequence into RWM.	SR 3.3.2.1.8	4.3.B.3.a, 4.3.B.3.b	3
L5	The ITS includes a Note that excludes the neutron detectors from the RBM - Upscale and - Downscale Functions Channel Calibration Surveillance.	SR 3.3.2.1.5 Note	N/A	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L6	The CTS requires the performance of a functional test on the RBM channels when a limiting control rod pattern exists prior to the withdrawal of the designated rod(s). This Surveillance has been deleted.	N/A	4.3.B.5	3
L7	The ITS includes a Note that modifies the RBM Applicability requirements, such that the RBM channels are not required to be Operable when a peripheral control rod is selected (since the RBM is automatically bypassed in this condition).	Table 3.3.2.1-1 footnote (a)	N/A	2
L8	The requirement to prepare and submit a report to the NRC within 30 days of a plant startup with the RWM inoperable has been deleted.	N/A	3.3.B.3.d	9
3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION				
L1	The explicit requirement to perform an Instrument Functional Test once every 24 months during each refueling outage has been deleted since a Channel Calibration is required on a 24 month Frequency and a 92 day Channel Functional Test is already required.	N/A	Table 4.2-6 Note 1.a	3
L2	The CTS requires a reduction in Thermal Power if the inoperable channels are not restored/tripped within the allowed times. In the ITS an additional option is provided if the inoperable channel(s) are the result of inoperable feedwater pump turbine or main turbine stop valve. If this is the case, then the ITS will allow removal of the affected stop valve(s) from service in lieu of reducing power.	3.3.2.2 Required Action C.1 (including Note)	N/A	5
3.3.3.1, PAM INSTRUMENTATION				
L1	The details relating to the Instrument I.D. numbers for the PAM Instrumentation are not included in the ITS.	N/A	Table 3.2-8	1
L2	The CTS requires the Containment High Range Radiation Monitors to be Operable in Run, Startup/Hot Standby, and Hot Shutdown (Modes 1, 2, and 3). In the ITS, the Mode 3 requirement is not maintained; the monitors are only required in MODES 1 and 2.	3.3.3.1 Applicability	Table 3.2-8 Note H	2
L3	The CTS precludes Mode changes if a PAM instrument is inoperable. The ITS includes a Note that allows Mode changes with a PAM instrument inoperable (i.e., LCO 3.0.4 is not applicable).	3.3.3.1 ACTIONS Note 1	N/A	7

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires the plant to be in cold shutdown within 24 hours when the one required containment high range radiation monitor has not been restored to operable status within 30 days. In the ITS, when both required containment high range monitors are inoperable and not restored within the allowed time, in lieu of a plant shutdown, a special report is required to be submitted to the NRC.	3.3.3.1 Required Action F.1	Table 3.2-8 Note A	5
L5	Not used.	N/A	N/A	N/A
L6	The CTS Channel Check Frequency is being changed from daily in the CTS to every 31 days in the ITS.	SR 3.3.3.1.1	Table 4.2-8 Instrument Check requirement	3
L7	A Note has been added to allow a channel to be Inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	Surveillance Requirements Note	N/A	6
	3.3.3.2, REMOTE SHUTDOWN SYSTEM			
L1	A Note has been added to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances.	Surveillance Requirements Note	N/A	6
L2	The CTS requirement to perform a Functional Test on each required remote shutdown system control circuit is proposed to be changed to verify each required Remote Shutdown System transfer switch and control switch performs the intended function. This change includes changing the manner of performance of this SR from operating each actuated component from the associated control panel (e.g., Remote Shutdown Panel) to allowing performance of a continuity check to confirm Operability (as specified in the Bases).	SR 3.3.3.2.2 (including Bases description)	Table 3.2-10 Functional Test requirement	3
	3.3.4.1, ATWS-RPT INSTRUMENTATION			
L1	The CTS allows 72 hours to place an inoperable instrument channel in trip if one channel is inoperable for one or more Trip Functions. The ITS will allow 14 days to restore the channel to operable status or to place the associated channel in trip.	3.3.4.1 Required Actions A.1 and A.2	Table 3.2-7 Note 1.a	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	When two or more channels are inoperable for one or more Functions, the CTS requires that the instrument channel(s) in one trip system and/or that trip system be in the tripped condition within 6 hours and requires the remaining channel in the other trip system to be restored to Operable status within 24 hours. In addition, the CTS will allow only one hour to restore trip capability for each Function. In the ITS, if two channels are inoperable for the same Function and trip capability is maintained, 14 days is allowed to restore or trip the channel. In addition, if only one Trip Function's capability is lost, the ITS will allow the restoration of ATWS-RPT trip capability in 72 hours. When both Trip Function's capability is lost, the ITS provides 1 hour to restore ATWS-RPT trip capability for one Trip Function, consistent with the CTS.	3.3.4.1 ACTIONS A, B, and C	Table 3.2-7 Note 1.b	4
L3	The CTS requires the plant be placed in the startup/hot standby mode (Mode 2) if the inoperable channels are not restored/tripped within the allowed times. In the ITS, an additional option is provided if the inoperable channel(s) are the result of an inoperable RPT breaker. If this is the case, then the ITS will allow removal of the affected recirculation pump from service in lieu of being in Mode 2.	3.3.4.1 Required Action D.1 (including Note)	N/A	5
	3.3.5.1, ECCS INSTRUMENTATION			
L1	Not used.	N/A	N/A	N/A
L2	The CTS requires restoration of an inoperable CS or LPCI Reactor Pressure-Low (Injection Permissive) channel; placing the channel in the tripped condition is not allowed. In the ITS, the inoperable channels are allowed to be placed in the tripped condition during MODE 4 or 5 operations.	3.3.5.1 ACTION B	Table 3.2-2 Note 6	4
L3	The CTS Reactor Pressure — Low (Recirculation Discharge Valve Permissive) Function is currently required to be Operable whenever the associated Low Pressure Coolant Injection (LPCI) System is required to be Operable (Modes 1, 2, 3, 4, and 5). In the ITS, the Function is only required to be Operable in MODE 1, 2 and 3 when the associated discharge valve is open.	Table 3.3.5.1-1 Function 2.d, including footnote (c)	3.2.B, Table 3.2-2 Item No. 24	2
L4	The CTS require action to be taken in 1 hour upon discovery of loss of initiation capability for the LPCI and CS Systems. In the ITS, these same actions are only required to be taken during MODES 1, 2 and 3.	3.3.5.1 Required Action B.1 Notes 1 and 2, 3.3.5.1 Required Action C.1 Notes 1 and 2	Table 3.2-2 Notes 2.A and 6.A	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	Not used.	N/A	N/A	N/A
L6	The Trip Level Settings (changed to Allowable Value in DOC A12) are being changed a) for the Containment High Pressure Function from > 1 psig and < 2.7 psig in the CTS to ≥ 1 psig to ≤ 2.7 psig in the ITS; b) for the Reactor Low Pressure (injection permissive) Function from ≥ 450 psig in the CTS to ≥ 410 psig and ≤ 490 psig in the ITS; and c) for the Reactor Low Pressure (recirculation discharge valve permissive) Function from 285 psig to 335 psig in the CTS to ≥ 295 psig in the ITS.	Table 3.3.5.1-1 Allowable Values for Functions 1.c, 2.c, 2.d, and 2.h	Table 3.2-2 Trip Level Setting for Item Nos. 6, 9, and 24	1
L7	The Trip Level Settings (changed to Allowable Value in DOC A12) are being changed a) for the Core Spray Pump Start Time Function from 11 ± 1.34 seconds in the CTS to ≤ 12.34 seconds in the ITS; and b) for the RHR Pump Start Timers Function from 1.25 ± 0.26 seconds for the first pump in loops A and B and 6.0 ± 0.73 seconds for the second pump in loops A and B in the CTS to ≤ 1.51 seconds for the A and D pumps and ≤ 6.73 seconds for the B and C pumps in the ITS.	Table 3.3.5.1-1 Allowable Values for Functions 1.d and 2.f	Table 3.2-2 Trip Level Settings for Item Nos. 11 and 12	1
3.3.5.2, RCIC SYSTEM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION				
L1	The CTS Safety Limit and actions when operating the RHR System in the Shutdown Cooling Mode are incorporated into the SDC Reactor Pressure-High Isolation Function. As such the ITS Applicability for the Function is only MODES 1, 2, and 3, and the actions if the channels are inoperable and not tripped within allowed time is to isolate the affected penetration.	Table 3.3.6.1-1 Function 6.a, 3.3.6.1 ACTION F	1.2.2, 2.2.2	1, 2
L2	The details relating to the Instrument I.D. numbers for the primary containment isolation instrumentation are not included in the ITS.	N/A	4.2.A, Table 3.2-8 Instrument 4	1
L3	The CTS Applicability for the SDC Reactor Low Water Level Function is MODES 1, 2, and 3 (when primary containment is required). The ITS does not include the Modes 1 and 2 Applicability for this Function. In addition, the CTS requirement that the Drywell Pressure High Function be Operable in Modes 1, 2, and 3 for the SDC isolation is also not included in the ITS.	Table 3.3.6.1-1 Function 6.b	Table 3.2-2 Trip Functions 1 and 5	1, 2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable RWCU reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L5	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable SDC reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, immediate action must be initiated to restore the channels to Operable status or to isolate the RHR SDC System.	3.3.6.1 ACTION J	Table 3.2-1 Note 3.A	5
L6	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable recirculation loop sample and recirculation pump seal purge penetrations reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L7	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable Main Steam Lines and drains reactor water level low channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, an optional action is provided to allow the affected main steam line to be isolated within 12 hours.	3.3.6.1 Required Action D.1	Table 3.2-1 Note 3.A	5
L8	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable hydrogen and oxygen sample lines and gaseous/particulate sample supply and return lines reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 1 hour.	3.3.6.1 ACTION F	Table 3.2-1 Note 3.A	5
L9	The CTS requires the isolation of the affected main steam lines within 8 hours when the inoperable main steam line high flow and condenser vacuum low channels are not tripped within the allowed times. In the ITS, in lieu of isolating the affected lines within 8 hours, an optional action is provided to place the plant in Mode 3 within 12 hours and Mode 4 within 36 hours.	3.3.6.1 Required Actions D.2.1 and D.2.2	Table 3.2-1 Notes 3.B and 3.G	5
L10	When more than one channel associated with a trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the associated Function. These actions must be taken even if primary containment isolation capability is maintained. The ITS will not include this requirement; 12 or 24 hours will be allowed (depending upon whether or not the channel is common to RPS) to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L11	The CTS provides 24 hours to reach cold shutdown (Mode 4). In the ITS, the time to reach Mode 4 is 36 hours.	3.3.6.1 Required Actions D.2.2 and H.2	Table 3.2-1 Note 3.A	6
L12	The CTS provides 8 hours to close the MSIVs. In the ITS, the time to close the MSIVs is 12 hours.	3.3.6.1 Required Action D.1	Table 3.2-1 Notes 3.B and 3.G	6
L13	Not used.	N/A	N/A	N/A
L14	The details that identify those portions of the instrument channel which require functional testing and the details that identify the type of test equipment used to perform a channel calibration have been deleted.	N/A	Tables 4.1-1 and 4.1-2	3
L15	Not used.	N/A	N/A	N/A
L16	The Trip Level Settings (changed to Allowable Value in DOC A16) for the HPCI Turbine Steam Line High Flow Function is changed from ≤ 160 inches of water dP in the CTS to ≤ 168.24 inches of water dP in the ITS.	Table 3.3.6.1-1 Allowable Value for Function 3.a	Table 3.2-1 Trip Level Setting for Trip Function 13	1
L17	The Trip Level Settings (changed to Allowable Value in DOC A16) for the Main Steam Line High Flow Function is changed from ≤ 140% of rated steam flow in the CTS to ≤ 125.9 psid in the ITS.	Table 3.3.6.1-1 Allowable Value for Function 1.c	Table 3.2-1 Trip Level Setting for Trip Function 9	1
L18	The ITS includes an allowance to open, under administrative controls, penetration flow paths closed to comply with the Actions.	3.3.6.1 ACTIONS Note 1	N/A	4
L19	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable TIP System reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the affected penetration flow path(s) must be isolated within 24 hours. Due to this change, the TIP System Functions listed above are called out as separate line items in the ITS.	3.3.6.1 ACTION G, Table 3.3.6.1-1 Functions 7.a and 7.b	Table 3.2-1 Note 3.A	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION			
L1	When more than one channel associated with a trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the associated Function. These actions must be taken even if secondary containment isolation capability is maintained. The ITS will not include this requirement; 12 hours will be allowed to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6
L2	The CTS requires the plant to be in cold shutdown in 24 hours when the inoperable reactor water level low or drywell pressure high channels are not tripped within the allowed times. In the ITS, in lieu of a shutdown when the channels are not tripped, the associated secondary containment penetration flow paths must be isolated and the associated SGT subsystems must be placed in operation within 1 hour, or the associated features (SCIVs and SGT subsystems) must be declared inoperable within 1 hour.	3.3.6.2 ACTION C	Table 3.2-1 Note 3.A	5
L3	Not used.	N/A	N/A	N/A
L4	The RETS requires the associated secondary containment penetration flow paths to be isolated and the associated SGT subsystems to be placed in operation when the inoperable refuel area exhaust monitors or reactor building area exhaust monitors channels are not restored to Operable status within the allowed times. In the ITS, in lieu of the requirements above when the channels are not restored, an optional action is provided to declare the associated features (SCIVs and SGT subsystems) inoperable within 1 hour.	3.3.6.2 Required Actions C.1.2 and C.2.2	RETS Table 3.10-1 Note d	5
L5	Not used.	N/A	N/A	N/A
L6	Not used.	N/A	N/A	N/A
L7	The details that identify those portions of the instrument channel which require functional testing and an instrument check and the detail of the method of calibration have been deleted.	N/A	Tables 4.1-1 and 4.1-2, RETS Table 3.10-2	3
L8	The RETS requires both trip systems to have at least one operable or tripped refuel area radiation monitor and reactor building area radiation monitor channel; however no actions are provided if trip capability is lost. The ITS includes an ACTION to allow 1 hour to restore isolation capability, if it is not maintained.	3.3.6.2 ACTION B	RETS Table 3.10-1	4
	3.3.7.1, CREVAS SYSTEM INSTRUMENTATION			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE
	3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION			
L1	The RETS requires the mechanical vacuum pump to be capable of being automatically isolated and secured whenever the main steam isolation valves are open. The Applicability is very broad and includes MODES 1, 2, 3, 4 and 5. Also, the CTS requires the function to be operable whenever the primary containment integrity is required by CTS 3.7.A.2, which is essentially Modes 1, 2, and 3. The Applicability of the ITS will be during MODES 1 and 2 with any condenser air removal pump not isolated and any main steam line not isolated, since this is when the vacuum pumps need to be isolated. In addition, the CTS requires the air removal pumps to be isolated when the main steam line high radiation channels are inoperable and not tripped. In lieu of this action, the ITS provides an optional action to isolate the main steam lines or to be in Mode 3.	3.3.7.2 Applicability, 3.3.7.2 Required Actions C.2 and C.3	RETS 3.9.a, Table 3.2-1 Notes 1 and 3.E	2, 5
L2	When more than one channel associated with the main steam line high radiation trip function is inoperable, the CTS requires action to be taken within 6 hours to place the channel(s) in trip in one trip system or to take the required actions specified in the Table for the Function. These actions must be taken even if condenser air removal pump isolation capability is maintained. The ITS will not include this requirement; 24 hours will be allowed to trip an inoperable channel provided isolation capability is maintained. If it is not, then the 1 hour action in the CTS and ITS will apply.	N/A	Table 3.2-1 Note 1.b.2) and footnote **	4, 6
L3	The CTS provides 8 hours to isolate the mechanical vacuum (air removal) pump. In the ITS, the time to isolate the air removal pump is 12 hours.	3.3.7.2 Required Action C.1	Table 3.2-1 Note 3.E	6
L4	The RETS stipulates a "simulated" automatic actuation test of the condenser air removal pump isolation shall be performed. The ITS allows use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that the air removal pump isolates on the proper signal.	SR 3.3.7.2.4	RETS Table 3.10-2 Note f	3
L5	The details identifying how the Logic System Functional Test is to be performed (i.e., where possible using test jacks) has been deleted.	N/A	RETS Table 3.10-2 Note f	3
	3.3.7.3, ESW SYSTEM INSTRUMENTATION			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS does not provide any specific actions for when the instrumentation is inoperable, thus the actions for inoperable ESW subsystems must be taken. Since each channel provides input to both ESW subsystems, both subsystems would have to be declared inoperable; and since the CTS does not provide any actions for both ESW subsystems inoperable, a shutdown per LCO 3.0.C would be required. In lieu of this shutdown action, the ITS provides three ACTIONS that allows operation to continue with inoperable channels if certain conditions are met. If one or more channels are inoperable, 24 hours is allowed to place the inoperable channels in trip. If isolation capability is not maintained in both trip systems, then 1 hour is permitted to restore initiation capability. Finally, if the two above listed actions are not met, then the associated ESW subsystem(s) must be declared inoperable.	3.3.7.3 ACTIONS A, B, and C	LCO 3.0.C	5
L2	The ITS includes a Note that allows placing a channel in an inoperable status solely for the performance of required Surveillances, without entering the associated Conditions and Required Actions for up to 6 hours provided the associated Function maintains initiation capability.	Surveillance Requirements Note	N/A	4
L3	The CTS requirement to perform an ESW instrumentation check once per day has been deleted, since there are no pressure indicators or recorders associated with this instrumentation.	N/A	4.11.D.1.e	3
L4	The CTS requires the Emergency Diesel Generator (EDG) System be demonstrated Operable immediately and at least daily thereafter if the ESW System (i.e., the ESW instrumentation) is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	3
L5	The CTS requires the Emergency Diesel Generator System emergency loads be verified Operable immediately and at least daily thereafter if the ESW System (i.e., the ESW instrumentation) is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	3
	3.3.8.1, LOP INSTRUMENTATION			
L1	The CTS Trip Level Settings (changed to Allowable Values) for the 4.16 kV Emergency Bus Undervoltage Loss of Voltage, Degraded Voltage, and Time Delay Functions have been changed in the ITS, consistent with recent setpoint calculations.	Table 3.3.8.1-1 Allowable Values for Functions 1.a, 1.b, 2.a, 2.b, and 2.c	Table 3.2-2 Trip Level Settings for Item Nos. 19, 20, 21, 22, and 23	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.8.2, RPS ELECTRIC POWER MONITORING			
L1	The CTS does not provide specific Applicability requirements for the RPS electric power monitoring assemblies (EPAs); however, the CTS Bases for this Specification and Amendment 76 to the JAFNPP Operating License specify that this protection is for the RPS. CTS Table 3.1-1 requires the RPS instrumentation to be Operable when in the refuel, startup and run modes. The CTS Applicability can be implied to be Modes 1, 2 , and 5. In the ITS, the Applicability for the RPS Electric Power Monitoring is MODES 1 and 2, and MODES 3, 4, and 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies; the assemblies are now only required in Mode 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. The MODES 3 and 4 requirement is necessary due to an allowance in ITS 3.10.3 and ITS 3.10.4 that allows a single control rod to be withdrawn in MODE 3 or 4.	3.3.8.2 Applicability	3.9.G Bases, Amendment 76, Table 3.1-1	2
L2	The time to remove the associated power supply from service when both RPS electric power monitoring assemblies are inoperable is being extended from 30 minutes in the CTS to 1 hour in the ITS.	3.3.8.2 Required Action B.1	3.9.G.2	6
L3	The CTS does not provide any actions if the associated power supply is not removed from service; thus a plant shutdown to cold shutdown (Mode 4) is required. In the ITS, the plant is only required to be placed in Mode 3, consistent with the Applicability.	3.3.8.2 ACTION C	N/A	5
L4	The CTS requires that at least one RPS division be powered from its respective motor generator while in MODE 1. If both RPS divisions are powered from the alternate power supply, there is a 7 day allowable outage time to restore at least one of the motor generator power supplies to Operable status, or the reactor is required to be placed in a cold condition within the next 24 hours. This requirement and action are not included in the ITS.	N/A	3.9.G.3	1, 4
L5	The CTS stipulates a "simulated" automatic actuation test of the RPS Electric Power Monitoring Assemblies shall be performed. The ITS allows use of an "actual" actuation signal (as identified in the Bases), in addition to the simulated automatic actuation signal, for verifying that the RPS Electric Power Monitoring Assemblies actuate on the proper signal.	SR 3.3.8.4, including Bases	4.9.G.2	3

CHANGE TYPE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.1, RECIRCULATION LOOPS OPERATING			
L1	The ITS allows the requirements of the LCO to not be met for reasons other than Condition A (i.e., thermal hydraulic stability) for up to 24 hours. In this same condition, the CTS would require restoration of requirements within 8 hours or would require a plant shutdown within the following 12 hours. This change relaxes the effective allowed outage time to 24 hours to comply with the LCO when the reason for non-compliance is not related to thermal hydraulic stability.	3.4.1 ACTION B	3.5.K.1, 3.11.A	6
	3.4.2, JET PUMPS			
L1	The CTS is revised by adopting two Notes that relax the Frequency by allowing a 4 hour delay to perform the Surveillance after the associated recirculation loop is in operation and a delay in performance of the Surveillance until 24 hours after the plant exceeds 25% RTP. The first Note permits a delay because the Surveillance can only be performed during recirculation loop operation, and the 4 hour period provides a reasonable time period in which to establish conditions appropriate for data collection and evaluation. The second Note permits a delay in performing the Surveillance until the plant exceeds 25% RTP, because during low flow conditions, jet pump noise approaches the threshold response of the flow instrumentation, which precludes collection of repeatable and meaningful data.	SR 3.4.2.1 Notes 1 and 2	4.6.G, 4.6.G.A.b	3
L2	The CTS requires that individual jet pump differential pressure not vary from the average of all jet pump differential pressures by more than 10%. The ITS requires that the differential pressure variation from established patterns be not more than 20%. 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." SIL-330 recommends the 10% criteria be used for plants designed with individual jet pump flow indicators. When measured by jet pump diffuser-to-lower plenum differential pressure, the equivalent criteria is 20% due to the relationship between flow and differential pressure. Since JAFNPP utilizes jet pump differential pressures measurement, the variance allowed should be 20%.	SR 3.4.2.1	4.6.G.3	3
	3.4.3, SAFETY/RELIEF VALVES			
L1	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, the time allowed for the plant to reduce temperature to be in MODE 4, is extended to 36 hours.	3.4.3 Required Action A.2	3.6.E.2	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.4, RCS OPERATIONAL LEAKAGE			
L1	The unidentified leakage rate increase limit is changed to be applicable only in MODE 1 instead of the current MODES 1, 2, and 3 (i.e., is at operating pressure after a period of 24 hours). An unidentified LEAKAGE increase of > 2 gpm within the previous 24 hour period indicates a potential flaw in the RCPB and must be quickly evaluated to determine the source and extent of the LEAKAGE. As the plant starts up and increases pressure, leakage will occur due to the increased pressure. Thus, an increase is detected, and if greater than the limit, could require a plant shutdown, even though there is no safety problem. This proposed change will not require the limit to be applied until MODE 1 is achieved, which is when reactor pressure has effectively stabilized at nominal operating pressure.	LCO 3.4.4.d	3.6.D.1.b	2
L2	The CTS requires that total leakage not exceed 25 gpm. The ITS requires that total LEAKAGE not exceed specified limits when averaged over the previous 24 hour period. Thus the ITS allows the instantaneous leakage to be greater than 25 gpm, as long as the average is less than 25 gpm.	LCO 3.4.4.c	3.6.D.1.c	1
L3	The CTS requires that the source of an increase in the leakage be identified within 4 hours. The ITS provides an additional option to allow the operators to reduce the leakage (or leakage increase) to within acceptable limits within the same 4 hours.	3.4.4 Required Action B.1	3.6.D.3	4
	3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION			
L1	The CTS allows continued operation for 30 days if only one monitor of the Continous Atmospheric Monitoring System (gaseous or particulate) is inoperable. The CTS also requires a grab sample to be taken every 24 hours during the 30 day period. If both are inoperable, a shutdown per CTS 3.0.C is required. The ITS will allow one of the two monitors to be inoperable indefinitely, provided SR 3.4.5.1, a CHANNEL CHECK, is performed on the remaining Operable Containment Atmospheric Monitoring System monitor, every 8 hours. The ITS will also allow both Containment Atmospheric Monitoring Systems monitors to be inoperable for 30 days, provided a grab sample is taken every 12 hours. Also, to be consistent with the format of the ITS, the term "one channel" is used in the ITS in lieu of defining in the LCO section of the Bases that the System is OPERABLE if only one of the two gaseous monitors (channels) and one of the two particulate monitors (channels) are OPERABLE.	LCO 3.4.5, 3.4.5 ACTIONS B and C	3.6.D.4, 3.6.D.6	1, 6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	The CTS requires that an inoperable sump monitoring system be restored to OPERABLE status within 24 hours. The ITS requires an inoperable drywell sump monitoring system be restored to OPERABLE status within 30 days. However, this 30 day Completion Time is allowed provided RCS unidentified and total LEAKAGE can still be determined every 4 hours.	3.4.5 ACTION A	3.6.D.5	6
L3	A statement that LCO 3.0.4 is not applicable for the condition of the drywell floor drain sump monitoring system inoperable or both drywell atmospheric monitors inoperable has been added as a Note to the ITS ACTIONS. Currently, this allowance is not provided.	3.4.5 ACTIONS A and C Notes	N/A	7
L4	The CTS requirement that an instrument check be performed on the drywell floor drain sump monitor once per day is not included in the ITS.	N/A	Table 4.2-5	3
L5	The drywell equipment drain sump monitoring system functions to quantify identified leakage. Since the purpose of ITS 3.4.5, RCS Leakage Detection Instrumentation, is to provide instrumentation requirements for early identification of unidentified leakage, the drywell equipment drain sump monitoring system requirements have been deleted.	N/A	3.6.D.4, 3.6.D.5, 4.6.D.4, Table 3.2-5, Table 4.2-5	1
L6	A Note has been added to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other Leakage Detection System channel is OPERABLE.	Surveillance Requirements Note	N/A	6
	3.4.6, RCS SPECIFIC ACTIVITY			
L1	The CTS requires that the reactor not be operated more than 5% of its annual power operation with the reactor coolant specific activity in excess of 0.2 μCi/gm DOSE EQUIVALENT I-131. This requirement is not adopted in the ITS, in accordance with the recommendations in Generic Letter 85-19, Reporting Requirements on Primary Coolant Iodine Spikes.	N/A	3.6.C.1	1
L2	The CTS requires that, if the iodine concentration exceeds the equilibrium limit by more than a factor of 10, or if the equilibrium limit is not met within 48 hours, the reactor be placed in a cold condition (MODE 4) within 24 hours. The ITS requires the plant to be in MODE 4 in 36 hours, essentially extending the time to reach MODE 4 by 12 hours.	3.4.6 Required Action B.2.2.2	3.6.C.1, 3.6.C.5	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS Applicability is effectively MODES 1, 2, and 3 (while no actual Applicability is specified, the Actions require entry into Mode 4). The ITS Applicability is MODE 1, and MODES 2 and 3 with any main steam line not isolated, since in MODES 2 and 3 with the main steam lines isolated, an escape path does not exist for release of radioactive material from the reactor coolant to the environment in the event of a main steam line break outside of primary containment. In addition, consistent with the change in the Applicability, an option is provided to isolate the main steam lines instead of commencing a reactor shutdown if the limits are not restored within the applicable completion time.	3.4.6 Applicability, 3.4.6 Required Action B.2.1	3.6.C	2, 4
L4	A statement that LCO 3.0.4 is not applicable for the condition of the specific activity not within limit but ≤ 2.0 μCi/gm DOSE EQUIVALENT I-131 has been added as a Note to the ITS. Currently, this allowance is not provided.	3.4.6 ACTION A Note	N/A	7
L5	The requirements to analyze for gross gamma activity have been deleted. In addition, the requirement to perform a quantitative determination of I-131 and I-133 if the total iodine concentration is in excess of 0.002 μCi/ml as indicated by the results of these surveillances is also deleted.	N/A	4.6.C.1.a, 4.6.C.1.c, 4.6.C.1.d, 4.6.C.1.e	3
L6	The CTS requires that the isotopic analysis of a sample of reactor coolant be taken at least once a month. A Note has been added that will require the SR to be performed only in MODE 1, since the level of fission products generated in MODES 2 and 3 is much less than those generated during power operation and, therefore, the limits are not challenged.	SR 3.4.6.1 Note	4.6.C.1.b	3
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.4.9, RCS P/T LIMITS				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires verification, when Reactor Coolant System temperature is > 140°F, that the temperature differential between the RCS and the reactor vessel bottom head, and between the RCS and an idle recirculation loop, are within limits prior to startup of the idle recirculation loop. In the ITS, these requirements are modified by a Note which states that these P/T verifications are only required to be met in MODES 1, 2, 3, and 4 during recirculation pump startup. Therefore, the overall Applicability of the Specification is reduced since the surveillances are no longer required in MODE 5 with temperatures > 140°F.	SR 3.4.9.3 Note 1, SR 3.4.9.5 Note	4.6.A.6	2, 3
L2	The CTS requires the temperature differential between the reactor coolant system and the reactor vessel bottom head drain line be ≤ 145°F during a recirculation pump startup . The ITS 3.4.9 maintains this Surveillance, but provides the option, in lieu of this Surveillance, to verify the active recirculation pump flow exceeds 40% of rated pump flow or the active recirculation pump has been operating below 40% rated flow for a period no longer than 30 minutes.	SR 3.4.9.3 Note 2, SR 3.4.9.4	3.6.A.6.a	3
CTS 3/4.6.F, STRUCTURAL INTEGRITY				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.1, ECCS - OPERATING			
L1	CTS requirements for actuation testing of CS, LPCI, HPCI, and ADS stipulate a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirements for verifying that each ECCS subsystem actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirements.	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.a, Table 4.2-2 Note 7	3
L2	CTS 4.5.A.2 requires the immediate verification that the remaining Core Spray (CS) subsystem and both low pressure coolant injection (LPCI) subsystems are Operable whenever it is determined that one CS subsystem is determined to be inoperable. It also requires the verification that the remaining CS subsystem is Operable daily thereafter. CTS 4.5.A.3.a requires the immediate and daily verification that the remaining LPCI subsystem and both CS subsystems are Operable whenever it is determined that one LPCI subsystem is determined to be inoperable. It also requires the verification that the remaining CS subsystem is Operable daily thereafter. CTS 4.5.C.1.a requires that both LPCI subsystems, both CS subsystems, and the ADS System actuation logic be verified to be Operable immediately when it is determined that HPCI is determined to be inoperable. It also requires that the RCIC System and the ADS System logic be verified to be Operable daily thereafter. When it is determined that two ADS valves are inoperable, CTS 4.5.D.2.a requires the ADS System actuation logic for the operable ADS valves and the HPCI System be verified to be Operable immediately and at least weekly thereafter. Finally, CTS 4.5.D.2.b requires that when it is determined that more than two relief/safety valves of the ADS are inoperable, the HPCI System shall be verified to be Operable immediately. These explicit verifications have all been deleted.	N/A	4.5.A.2, 4.5.A.3.a, 4.5.C.1.a, 4.5.D.2.a 4.5.D.2.b	4
L3	The pressure at which ADS is required to be Operable is proposed to be increased from > 100 psig to > 150 psig to provide consistency with the Operability requirements for HPCI. Along with this change the default action of the CTS to reduce pressure to less than 100 psig has been changed to reduce reactor steam dome pressure to ≤ 150 psig consistent with the Applicability.	3.5.1 Applicability, 3.5.1 Required Action G.2	3.5.D.1.a, 3.5.D.2	2
L4	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for LPCI or CS cannot be satisfied, requires that the reactor be in the cold condition and reactor pressure be reduced to less than 150 psig within 24 hours when the ACTIONS for HPCI cannot be satisfied, requires that the reactor be placed in the cold condition and that reactor pressure be reduced to less than 100 psig (modified by DOC L3) within 24 hours when the Required Actions for inoperable ADS valves cannot be satisfied, and 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 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. The ITS extends the time allowed for the plant to reduce pressure or be in MODE 4 from 24 hours to 36 hours.	3.5.1 Required Actions B.2 and G.2	3.5.A.6, 3.5.C.1.b, 3.5.D.2, 3.9.F.3	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	The CTS allows continued operation for a maximum of 7 days after HPCI only is determined to be inoperable. The ITS allows continued operation for a maximum of 14 days under the same conditions.	3.5.1 Required Action C.1	3.5.C.1.a	6
L6	The CTS allows continued operation for a limited time if HPCI is inoperable only if the ADS subsystem, the RCIC System, both LPCI subsystems and both core spray subsystems are Operable. The ITS will allow continued operation for 72 hours if HPCI and one low pressure ECCS subsystem are inoperable or HPCI and one LPCI pump in each LPCI subsystem are inoperable.	3.5.1 ACTION D	3.5.C	4
L7	The flow rates specified in the CTS for the Low Pressure Injection System and the High Pressure Injection System have been decreased from 8910 gpm to 7700 gpm and from 4250 gpm to 3400 gpm, respectively, consistent with the values used in the plant specific LOCA analysis reflected in NEDC-31317P (James A. FitzPatrick Nuclear Power Plant SAFER/GESTR-LOCA Loss of Coolant Accident Analysis).	SR 3.5.1.7, SR 3.5.1.8	4.5.A.3, 4.5.C.1	3
L8	The CTS requires that with one low pressure coolant injection pump inoperable in each subsystem, the plant be shutdown in accordance with the CTS 3.0.C, implying that the plant is outside design basis. This condition is not outside design basis, thus the ITS allows continued operation for 7 days in this condition.	3.5.1 Condition A (second part)	3.5.A.3.a	5
L9	The details in the CTS related to the specific inverter buses (MCC-155 and MCC-165) required to be in service are not necessary to ensure the LPCI inverter and buses remain Operable. Therefore, they have not been included in the ITS.	N/A	3.9.F.1	1
L10	The CTS requires, if one independent power supply becomes inoperable, the inoperable independent power supply be isolated from its associated LPCI MOV bus, and this bus be manually switched to its alternate power source. If this cannot be met, CTS 3.0.C must be entered and the plant must be in Cold Shutdown within 24 hours. This requirement has not been included in the ITS since another CTS section (CTS 3.5.A.2) allows a 7 day Completion Time for any other LPCI subsystem inoperability with no other compensatory actions.	N/A	3.9.F.2.a	4
L11	The CTS requires the performance of additional Surveillances on the OPERABLE LPCI MOV Independent Power Supply System if one LPCI MOV Independent Power Supply System is inoperable. The ITS does not include these additional Surveillance Requirements.	N/A	3.9.F.2.b	4
L12	The ITS includes a Note that allows the LPCI subsystems to be considered OPERABLE during alignment and operation in decay heat removal below the RHR cut in permissive in MODE 3, if capable of being manually realigned and not otherwise inoperable. Currently, this is not allowed in the CTS; the LPCI subsystem must be considered inoperable in this condition.	SR 3.5.1.2 Note	N/A	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L13	The CTS requires "all" Automatic Depressurization System (ADS) pilot valves to be opened during the performance of the simulated automatic actuation test. The ITS requires the verification that ADS actuates on an actual (as modified by DOC L1) or simulated automatic initiation signal, and will only require the pilot valves (solenoids) associated with six Operable ADS valves to be tested during the performance of the Surveillance, since only "required" equipment must be OPERABLE to satisfy the conditions of the LCO.	SR 3.5.1.11	4.5.D.1	3
L14	The CTS requires pressure to be reduced to less than 150 psig if HPCI is not restored to Operable status within the allowed time. The ITS requires reactor steam dome pressure to be reduced to ≤ 150 psig under the same condition. This change is slightly less restrictive since a reduction in reactor steam dome pressure to only 150 psig will be considered as satisfying the requirement, whereas in the CTS reactor steam dome pressure must be reduced to < 150 psig.	3.5.1 Required Action G.2	3.5.C.1.b	4
L15	The CTS requires that HPCI flow be demonstrated "against a system head corresponding to a reactor vessel pressure of 1195 to 150 psig." The ITS requires a demonstration of required HPCI flow "against a system head corresponding to reactor pressure." Adopting the ITS wording for the low pressure test results in testing requirements analogous to the CTS specification and current testing practices at the low end of the HPCI operability band. Adopting the ITS wording for the high end of the HPCI operability band, however, constitutes a less restrictive change.	SR 3.5.1.8, SR 3.5.1.9	4.5.C.1.b	3
3.5.2, ECCS - SHUTDOWN				
L1	The CTS requires immediate suspension of OPDRVs when one of the two required low pressure ECCS subsystems are inoperable. The ITS will allow 4 hours to restore one required ECCS injection/spray subsystem to OPERABLE status, since the remaining OPERABLE subsystem can provide sufficient vessel flooding capability to recover from an inadvertent vessel draindown.	3.5.2 ACTION A	3.5.F.4	6
L2	The CTS requires the suppression pool water level and Condensate Storage Tank (CST) level to be verified to be within the specified limits once per 8 hours. The ITS will require these verifications every 12 hours.	SR 3.5.2.1, SR 3.5.2.2	4.5.F.3, 4.5.F.4	3
L3	The CTS requires the suspension of Core Alterations when the requirements of CTS 3.5.F.1, 3.5.F.2 or 3.5.F.3 are not met. The ITS does not retain any ECCS operability requirements during Core Alterations.	N/A	3.5.F.4	2

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	CTS requirements for actuation testing of CS and LPCI stipulate a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirements for verifying that each required CS and LPCI subsystem actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirements.	SR 3.5.2.6	Table 4.2-2 Note 7	3
L5	The flow rate specified in the CTS for the Low Pressure Injection System has been decreased from 8910 gpm to 7700 gpm, consistent with the values used in the plant specific LOCA analysis reflected in NEDC-31317P (James A. FitzPatrick Nuclear Power Plant SAFER/GESTR-LOCA Loss of Coolant Accident Analysis).	SR 3.5.2.5	4.5.F.1	3
	3.5.3, RCIC SYSTEM			
L1	The CTS allows continued operation for a maximum of 7 days after RCIC only is determined to be inoperable. The ITS allows continued operation for a maximum of 14 days under the same conditions.	3.5.3 Required Action A.2	3.5.E.1	6
L2	The CTS requires that the reactor be in the cold condition and reactor pressure be reduced to less than 150 psig within 24 hours when the ACTIONS for RCIC cannot be satisfied. The ITS extends the time allowed for the plant to reduce pressure from 24 hours to 36 hours.	3.5.3 Required Action B.2	3.5.E.2	6
L3	The CTS requirement for actuation testing of RCIC stipulates a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirement for verifying that the RCIC System actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirement.	SR 3.5.3.5	4.5.E.1.a	3
L4	The CTS requires that the HPCI System be verified to be Operable daily whenever the RCIC System is inoperable. This explicit verification has been deleted.	N/A	4.5.E.2	4
L5	The CTS requires pressure to be reduced to less than 150 psig if RCIC is not restored to Operable status within the allowed time. The ITS requires reactor steam dome pressure to be reduced to ≤ 150 psig under the same condition. This change is slightly less restrictive since a reduction in reactor steam dome pressure to only 150 psig will be considered as satisfying the requirement, whereas in the CTS reactor steam dome pressure must be reduced to < 150 psig.	3.5.3 Required Action B.2	3.5.E.2	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L6	The CTS requires that RCIC flow be demonstrated "against a system head corresponding to a reactor vessel pressure of 1195 to 150 psig." The ITS requires a demonstration of required RCIC flow "against a system head corresponding to reactor pressure." Adopting the ITS wording for the low pressure test results in testing requirements analogous to the CTS specification and current testing practices at the low end of the RCIC operability band. Adopting the ITS wording for the high end of the RCIC operability band, however, constitutes a less restrictive change.	SR 3.5.3.3, SR 3.5.3.4	4.5.E.1.d	3

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.1, PRIMARY CONTAINMENT			
L1	The CTS does not provide any time to restore the primary containment to Operable status if it is found to be inoperable. In the ITS, 1 hour is allowed to restore primary containment to OPERABLE status prior to the commencement of a plant shutdown.	3.6.1.1 ACTION A	3.7.A.2	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.1 Required Action B.2	3.7.A.8	6
L3	The Frequency for performing a visual inspection of the accessible interior surfaces of the drywell and above the water line of the torus (suppression chamber) for evidence of deterioration is being changed from every 24 months to three times in a ten year period in the ITS. The ITS will effectively require the visual inspection to be performed prior to each Type A test and two additional times during each 10 year interval.	SR 3.6.1.1.1	4.7.A.1	3
	3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS			
L1	The ITS includes a Note to permit entry through a closed or locked air lock door (closed due to an inoperable door in the associated air lock) for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the proposed Bases.	3.6.1.2 ACTIONS Note 1	N/A	4
L2	The ITS includes a Note to permit entry through a closed or locked air lock door (closed due to an inoperable door in the associated air lock) for any purpose for up to 7 days. The proposed allowance will have strict administrative controls, which are detailed in the proposed Bases.	3.6.1.2 Required Action A Note 2	N/A	4
L3	A new ACTION is included in the ITS for when a primary containment air lock is inoperable for reasons other than one primary air lock door inoperable or a primary containment air lock interlock mechanism inoperable. The ITS will allow up to 24 hours to restore the inoperable air lock under this condition, provided the primary containment is not rendered inoperable by the air lock inoperability.	3.6.1.2 ACTION C, 3.6.1.2 ACTIONS Note 3	N/A	4, 6
L4	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.2 Required Action D.2	3.7.A.8	6
L5	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each air lock."	3.6.1.2, 3.6.1.3 ACTIONS Note 2	3.7.A.4	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES			
L1	The CTS stipulates a "simulated" automatic actuation test of the PCIVs shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each PCIV actuates on an automatic isolation signal.	SR 3.6.1.3.7	4.7.D.1.a, Table 4.2-1 Note 7	3
L2	Not used.	N/A	N/A	N/A
L3	The CTS does not provide specific ACTIONS for those open penetrations with two or more inoperable PCIVs (except due to a leakage problem); thus the plant must be in cold shutdown within 24 hours. In the ITS, 1 hour is allowed to isolate the affected penetration flow path prior to requiring a plant shutdown.	3.6.1.3 ACTION B	3.7.D.3	5
L4	The CTS does not provide specific ACTIONS for those open penetrations that have only one PCIV and the PCIV is inoperable; thus the plant must be in cold shutdown within 24 hours. In the ITS, 4 hours is provided if the inoperable PCIV is not an EFCV or not in a closed system and 72 hours is provided if the inoperable PCIV is an EFCV or is in a closed system, to isolate the penetration prior to requiring a plant shutdown. In addition, a periodic verification of the isolated penetration is required every 31 days.	3.6.1.3 ACTION C	3.7.D.3	5
L5	The CTS allows 4 hours to isolate a penetration when one PCIV in the penetration is inoperable. In the ITS, 8 hours is allowed to isolate a main steam line penetration.	3.6.1.3 Required Action A.1, second Completion Time	3.7.D.2.b	6
L6	The ITS includes an additional method of isolating a penetration when a PCIV is inoperable. The ITS will allow the penetration to be isolated by use of a check valve with flow through the valve secured.	3.6.1.3 Required Action A.1	N/A	4
L7	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.3 Required Action F.2	3.7.D.3, 3.7.A.8	6
L8	The periodic verification that a penetration is isolated (when isolated to comply with other actions) is changed from a daily recording requirement in the CTS to a monthly verification or a verification "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, for isolation devices inside primary containment" in the ITS.	3.6.1.3 Required Action A.2 and C.2	4.7.D.2	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L9	The CTS does not provide specific ACTIONS for those MSIVs that are inoperable due to a leakage problem; thus the plant must be in cold shutdown within 24 hours. In the ITS, 8 hours are allowed to restore MSIV leakage to within limits prior to requiring a plant shutdown.	3.6.1.3 ACTION D	3.7.A.8	5
L10	The CTS does not provide specific ACTIONS for the air operated testable check valves associated with the LPCI and CS systems injection penetrations that are inoperable due to a leakage problem; thus the plant must be in cold shutdown within 24 hours. In the ITS, 72 hours are allowed to restore the leakage to within limits prior to requiring a plant shutdown.	3.6.1.3 ACTION E	3.7.A.8	5
L11	The CTS requires a verification that a penetration flow path with an inoperable PCIV is isolated. The ITS includes Notes that allow the verification to be performed administratively for isolation devices that are in high radiation areas and for isolation devices that are locked, sealed, or otherwise secured.	3.6.1.3 Required Actions A.2 and C.2 Note, SR 3.6.1.3.2 Notes 1 and 2, SR 3.6.1.3.3 Notes 1 and 2	4.7.D.2	3, 4
L12	The CTS identifies the plant specific valve numbers for the air operated testable check valves associated with the LPCI and CS systems injection penetrations. The ITS does not include these plant specific valve numbers.	N/A	4.7.A.2.c	3
L13	The CTS requirement to demonstrate the leakage rate of the Low Pressure Coolant Injection (LPCI) System and Core Spray System injection penetration air operated testable check valves is within limits once per 24 months is changed in the ITS to be every 30 months (and the 30 month test interval may be extended to 60 months with satisfactory test performance), as part of the Type C testing required by the Primary Containment Leakage Rate Testing Program.	SR 3.6.1.3.11	4.7.D.2.c	3
3.6.1.4, DRYWELL PRESSURE				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, DRYWELL AIR TEMPERATURE				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS				
L1	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each line."	3.6.1.6 ACTIONS Note	N/A	4
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.6 Required Action E.2	3.7.A.8	6
3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS				
L1	The CTS requires that "When it is determined that one vacuum breaker is inoperable for fully closing when operability is required, the operable breakers shall be exercised immediately, and every 15 days thereafter until the inoperable valve has been returned to normal service." This requirement has not been included in the ITS.	N/A	4.7.A.5.b	3
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.7 Required Action C.2	3.7.A.8	6
L3	Not used.	N/A	N/A	N/A
L4	The Frequency of the exercising of each Suppression Chamber-to-Drywell vacuum breaker through an open-close cycle is being extended from "monthly" in the CTS to "In Accordance with the Inservice Testing (IST) Program" (i.e., 92 days) in the ITS.	SR 3.6.1.7.2	4.7.A.5.a	3
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.6.1.9, RHR CONTAINMENT SPRAY				
L1	Not used.	N/A	N/A	N/A

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.1.9 Required Action C.2	3.5.B.4	6
L3	The Frequency for performance of an air test on the containment spray header and nozzles has been extended from 5 years in the CTS to 10 years in the ITS.	SR 3.6.1.9.3	4.5.B.1.f	3
L4	The CTS requires two Residual Heat Removal (RHR) pumps to be Operable in each containment spray mode subsystem. In the ITS, only one RHR pump, as indicated in the Bases, will be required to be Operable in each RHR containment spray subsystem.	LCO 3.6.1.9 (including bases)	3.5.B.1	1
L5	No actions are provided in the CTS for when two RHR containment spray subsystems are inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION is provided to allow both RHR containment spray subsystems to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.6.1.9 ACTION B	N/A	5
	3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE			
L1	No specific actions are provided in the CTS for when the suppression pool temperature is exceeding the temperature limit during normal power operation (i.e., not due to testing); thus a plant shutdown to cold shutdown is required. In the ITS, 24 hours is allowed to restore the suppression pool temperature to ≤ 95 °F, provided the temperature is ≤ 110 °F and no testing that adds heat to the suppression pool is in progress.	3.6.2.1 Required Action A.2	3.7.A.1	5
L2	No specific actions are provided in the CTS for when the suppression pool temperature is exceeding the temperature limit during normal power operation; thus a plant shutdown to cold shutdown is required. In the ITS, after the time allowed to restore the suppression pool temperature to within limits described in DOC L1 has expired, 12 hours are allowed to reduce power to ≤ 1% RTP (i.e., the ITS does not require a shutdown to cold shutdown).	3.6.2.1 ACTION B	3.7.A.8	5
L3	The CTS requires an external visual inspection of the suppression chamber whenever there is indication of relief valve operation with the local suppression pool temperature reaching 160°F or greater and the primary coolant system pressure greater than 200 psig. This Surveillance is not included in the ITS.	N/A	4.7.A.1	3
L4	The CTS requires monitoring suppression pool temperature when "there is indication of relief valve operation or testing which adds heat to the suppression pool." The ITS only requires increased monitoring of the suppression pool temperature during testing; the requirement to monitor when there is indication of relief valve operation is not included in the ITS unless it is associated with a specific test.	SR 3.6.2.1.1	4.7.A.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L5	In the CTS, if the testing limit of 105 °F (95 °F plus the 10 °F increase allowed during testing) is exceeded, the CTS requires the reactor to be placed in the cold condition within 24 hours. In the ITS, if the suppression pool temperature exceeds 105 °F, then testing must be immediately suspended and 24 hours is then allowed to restore temperature to ≤ 95 °F prior to requiring a plant shutdown.	3.6.2.1 Required Actions A.2 and C.1	3.7.A.1.c.(2), 3.7.A.8	5
	3.6.2.2, SUPPRESSION POOL WATER LEVEL			
L1	No specific actions are provided in the CTS for when the suppression pool water level is not within the limits; thus a plant shutdown to cold shutdown is required. In the ITS, 2 hours is allowed to restore the water level to within limits prior to requiring a plant shutdown.	3.6.2.2 ACTION A	3.7.A.8	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.2.2 Required Action B.2	3.7.A.8	6
	3.6.2.3, RHR SUPPRESSION POOL COOLING			
L1	Not used.	N/A	N/A	N/A
L2	The CTS requires two Residual Heat Removal (RHR) pumps to be Operable in each suppression pool cooling mode subsystem. In the ITS, only one RHR pump, as indicated in the Bases, will be required to be Operable in each RHR suppression pool cooling subsystem.	LCO 3.6.2.3 (including bases)	3.5.B.1	1
L3	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.2.3 Required Action C.2	3.5.B.4	6
L4	No actions are provided in the CTS for when two RHR suppression pool cooling subsystems are inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION is provided to allow both RHR suppression pool cooling subsystems to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.6.2.3 ACTION B	N/A	5
	3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE			
L1	The Frequency to monitor the drywell-to-suppression chamber differential pressure has been changed from once per 8 hours in the CTS to once per 12 hours in the ITS.	SR 3.6.2.4.1	4.7.A.7.a	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION				
NONE	NONE	NONE	NONE	NONE
3.6.3.2, CAD SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, SECONDARY CONTAINMENT				
L1	The CTS does not provide any time to restore the secondary containment to Operable status if it is found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if the secondary containment is inoperable. In the ITS, 4 hours is allowed to restore secondary containment to OPERABLE status prior to the commencement of a plant shutdown.	3.6.4.1 ACTION A	3.7.C.2	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.4.1 Required Action B.2	3.7.C.2	6
L3	The CTS requires the Reactor Coolant System to be vented in order for secondary containment to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L4	The requirement to perform the secondary containment capability test "prior to refueling" is not included in the ITS since the normal periodic Surveillance Frequency is sufficient.	N/A	4.7.C.1.c	3
L5	CTS 3.7.C.2 requires all four conditions of CTS 3.7.C.1 to be met if secondary containment is inoperable. If secondary containment is inoperable when moving irradiated fuel while operating in MODE 1, 2, or 3, CTS requires plant shutdown and cooldown actions within 24 hours (CTS 3.7.C.1.a and 3.7.C.1.b) in addition to suspension of movement of irradiated fuel (CTS 3.7.C.1.d). In ITS, for the same set of conditions (that is, if secondary containment is inoperable when operating in MODE 1, 2, or 3 and while moving irradiated fuel) the addition of the Note to ITS 3.6.4.1 Required Action C.1 allows plant operation to continue for the 4 hour period allowed by ITS 3.6.4.1 ACTION A, prior to entering any action that requires plant shutdown and cooldown (ITS 3.6.4.1 ACTION B).	3.6.4.1 Required Action C.1 Note	3.7.C.2	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES			
L1	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in MODE 4.	3.6.4.2 Required Action C.2	3.7.C.2	6
L2	The ITS includes a Note that allows penetration flow paths to be unisolated intermittently under administrative controls, if they were closed to comply with actions.	3.6.4.2 ACTIONS Note 1	N/A	4
L3	The CTS does not provide any time to restore one inoperable secondary containment isolation valve in a penetration to Operable status if it is found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if a secondary containment isolation valve is inoperable. In the ITS, 8 hours is allowed to isolate the affected secondary containment penetration prior to the commencement of a plant shutdown.	3.6.4.2 ACTION A	3.7.C.2	5
L4	The CTS does not provide any time to restore both inoperable secondary containment isolation valves in a penetration to Operable status if they are found to be inoperable. The CTS requires the plant to be in essentially cold shutdown within 24 hours if any secondary containment isolation valves are inoperable. In the ITS, 4 hours is allowed to isolate the affected secondary containment penetration prior to the commencement of a plant shutdown.	3.6.4.2 ACTION B	3.7.C.2	5
L5	The CTS requires the Reactor Coolant System to be vented in order for secondary containment isolation valves to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L6	Not used.	N/A	N/A	N/A
L7	The CTS/RETS stipulates a "simulated" automatic actuation test of the SCIVs shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each SCIV actuates on an automatic isolation signal.	SR 3.6.4.2.3	Table 4.2-1 Note 7, RETS Table 3.10-2 Note 7	3
L8	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path."	3.6.4.2 ACTIONS Note 2	N/A	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L9	In the CTS, if secondary containment is inoperable (due to SCIV inoperability) during movement of irradiated fuel, or during CORE ALTERATIONS, while operating in MODE 1, 2, or 3, CTS requires plant shutdown and cooldown actions within 24 hours (CTS 3.7.C.1.a and 3.7.C.1.b) in addition to suspension of CORE ALTERATIONS and suspension of movement of irradiated fuel (CTS 3.7.C.1.c and CTS 3.7.C.1.d respectively). In ITS the addition of the Note to ITS 3.6.4.2, Required Action D.1, precludes entry into ITS 3.0.3 (and thus the plant shutdown Actions of ITS 3.0.3 are not available) while ITS 3.6.4.2 Required Action A.1 or Required Action B.1, allow plant operation to continue for 8 hours or 4 hours, respectively, prior to entering any action that requires plant shutdown and cooldown (ITS 3.6.4.2 ACTION C).	3.6.4.2 Required Actions D.1 Note	N/A	5
	3.6.4.3, STANDBY GAS TREATMENT SYSTEM			
L1	The CTS prohibits irradiated fuel handling operations and operations that could reduce the shutdown margin (i.e., CORE ALTERATIONS) if the inoperable SGT subsystem is not restored to Operable status within the allowed completion time. In the ITS, in lieu of suspending these activities, the option exists to place the OPERABLE SGT subsystem in operation.	3.6.4.3 Required Action C.1	N/A	5
L2	Not used.	N/A	N/A	N/A
L3	The CTS requires the Reactor Coolant System to be vented in order for the SGT system to not be required. The ITS does not include this requirement.	N/A	3.7.C.1.b	2
L4	The CTS/RETS stipulates a "simulated" automatic actuation test of the SGT subsystems shall be performed. The ITS allows for use of an "actual" isolation signal, in addition to the simulated automatic isolation signal, for verifying that each SGT subsystem actuates on an automatic initiation signal.	SR 3.6.4.3.3	Table 4.2-1 Note 7, 4.7.B.1.d, RETS Table 3.10-2 Note f	3
L5	Not used.	N/A	N/A	N/A
	CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM			
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.1, RHRSW SYSTEM			
L1	The CTS allows operation to continue for 30 days with one RHR service water pump inoperable provided that during such 30 days all remaining components of the containment cooling mode subsystems are operable. This means that all four RHR pumps are OPERABLE as well as the remaining RHR service water pumps. The ITS does not include this requirement, since other LCOs and ACTIONS contain the proper actions to take if other components of the containment cooling mode become inoperable.	N/A	3.5.B.2, 3.5.B.3	4
L2	The CTS does not provide specific ACTIONS for two Residual Heat Removal (RHR) service water subsystems inoperable for reasons other than one inoperable pump in each subsystem. Thus, a shutdown is required by CTS 3.0.C and the plant must be placed in a cold condition within 24 hours. In the ITS, when both RHRSW subsystems are inoperable for reasons other than one pump in each subsystem inoperable, 8 hours is allowed to restore one RHR service water subsystem to OPERABLE status.	3.7.1 ACTION D	3.0.C	6
L3	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for RHRSW inoperabilities cannot be satisfied. The ITS extends the time allowed for the plant to be in MODE 4 from 24 hours to 36 hours.	3.7.1 Required Action E.2	3.5.B.4	6
L4	The CTS requires the remaining components of the containment cooling mode subsystems to be verified to be operable immediately and daily thereafter when an RHRSW component is inoperable. These explicit verifications have all been deleted.	N/A	4.5.B.2, 4.5.B.3	4
L5	The CTS requires that each RHRSW subsystem "valve (manual, power operated, or automatic) in the flowpath that is not locked, sealed or otherwise secured in position, is in the correct position" once per 31 days. The ITS requires that "each RHRSW manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position" every 31 days. The proposed change permits the RHRSW subsystem to be considered OPERABLE as long as the valves can be manually realigned to their correct position.	SR 3.7.1.1	4.5.B.1.e	3
	3.7.2, ESW SYSTEM and UHS			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requirement for actuation testing of the ESW System stipulates a simulated automatic actuation test shall be performed. The phrase "actual or," in reference to the automatic initiation signal, has been added to the ITS Surveillance Requirement for verifying that the ESW System actuates on an automatic initiation signal. This allows satisfactory automatic system initiations to be used to fulfill the Surveillance Requirement.	SR 3.7.2.7	4.11.D.1.a	3
L2	The CTS requires the Emergency Diesel Generator System emergency loads be verified Operable immediately and at least daily thereafter if the ESW System is inoperable. These explicit verifications have all been deleted.	N/A	3.11.D.2	4
L3	The CTS requires that the reactor be in the cold condition within 24 hours when the ACTIONS for ESW and Ultimate heat sink inoperabilities cannot be satisfied. The ITS extends the time allowed for the plant to be in MODE 4 from 24 hours to 36 hours.	3.7.2 Required Action C.2	3.11.D.3, 3.0.C	6
L4	The CTS requires the Emergency Diesel Generator (EDG) System be demonstrated Operable immediately and at least daily thereafter if the ESW System is inoperable. These explicit verifications have all been deleted. The ITS will only require a single verification (through the EDG Technical Specification ACTIONS) of EDG Operability, either through an evaluation or demonstration, within 24 hours.	3.8.1 Required Actions B.3.1 and B.3.2	3.11.D.2	4
L5	The CTS requirement to monitor individual heater current whenever large deviations are identified in the feeder checks has been deleted.	N/A	4.11.E.2	3
3.7.3, CREVAS SYSTEM				
L1	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 allow the test to be performed on a STAGGERED TEST BASIS, such that each subsystem is tested every 36 months instead of the current 18 months.	SR 3.7.3.3	4.11.A.5	3
3.7.4, CONTROL ROOM AC SYSTEM				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS			
L1	The RETS requires the plant to isolate the SJAE or all main steam lines within the next 12 hours if the SJAE release rate is not below the trip level within 72 hours. The ITS includes an additional option allowing the plant to be in MODE 3 within 12 hours and in MODE 4 within 36 hours, in lieu of isolating the SJAE or main steam lines.	3.7.5 Required Actions B.3.1 and B.3.2	N/A	4
L2	The RETS 3.5.a (LCO) specifies that the limits of gross radioactivity rate of noble gases is given on Table 3.10-1. RETS Table 3.10-1 specifies the trip level setting for the SJAE Radiation Monitors as 500,000 μCi/sec. This LCO limit has been increased from 500,000 to 600,000 μCi/sec consistent with the value used in the Offgas System Failure accident of UFSAR, Section 11.4.7.2.	LCO 3.7.5, SR 3.7.5.1	RETS 3.5.a (LCO section), RETS Table 3.10-1	1
L3	The RETS requires that the Survelilance that determines the gross gamma activity rate is within limit must be current prior to entry into the mode of applicability in accordance with CTS 3.0.D. In the ITS, a Note clarifies when the surveillance must be performed. The Note specifies that the surveillance is not required to be performed until 31 days after any main steam line is not isolated and the SJAE are in operation since in this condition radioactive fission gases may be in the Main Steam Offgas System at significant rates.	SR 3.7.5.1 Note	RETS 3.5.a (SR section)	3
	3.7.6, MAIN TURBINE BYPASS SYSTEM			
NONE	NONE	NONE	NONE	NONE
	3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL			
L1	The CTS requires the spent fuel storage pool level to be greater than or equal to the minimum level whenever irradiated fuel is stored in the spent fuel storage pool. The ITS Applicability is during movement of irradiated fuel assemblies in the spent fuel storage pool, consistent with the assumptions of the bounding design basis refueling accident described in UFSAR, Section 12.2A.6 Event 10 and UFSAR, Section 14.6.1.4.	3.7.7 Applicability	3/4.10.C	2
L2	The CTS requires the spent fuel storage pool level to be recorded daily. The ITS requires the verification of the spent fuel storage level every 7 days.	SR 3.7.7.1	4.10.C	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	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. The requirement to shutdown is not maintained in the ITS (see DOC M1 for new ACTION). In addition, the ITS includes a Note that states LCO 3.0.3 is not applicable to the new ACTION. This Note is necessary because defaulting to ITS LCO 3.0.3 would require the reactor to be shutdown but would not require suspension of movement of irradiated fuel which would preclude a refueling accident from occurring over the spent fuel pool.	3.7.7 ACTION A Note	3.0.C	4
CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES				
NONE	NONE	NONE	NONE	NONE
CTS 3/4.11.C, BATTERY ROOM VENTILATION				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.1, AC SOURCES - OPERATING			
L1	The CTS does not provide a specific Action for the condition of one inoperable offsite circuit and one inoperable EDG subsystem. Therefore, if this Condition existed the plant would be required to enter LCO 3.0.C and place the plant in cold shutdown in 24 hours. The ITS includes a new ACTION that provides 12 hours to restore either the inoperable EDG or the inoperable offsite circuit in this condition prior to requiring a plant shutdown.	3.8.1 ACTION D	N/A	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4.	3.8.1 Required Action F.2	3.9.B.1, 3.9.B.2, 3.9.B.3, 3.9.B.4, 3.0.E	6
L3	The CTS requires that each EDG subsystem be force paralleled and loaded to 5200 kW, and load sharing capability checked. The ITS will require each EDG subsystem be paralleled with normal, reserve, or backfeed power and each EDG be loaded and operated at a load ≥ 2340 kW and ≤ 2600 kW. Thus the change essentially provides a load range of 2340 kW to 2600 kW (and does not use the term "load sharing"), whereas the CTS required a specific limit of 2600 kW per EDG.	SR 3.8.1.3	4.9.B.1	3
L4	The CTS stipulates a simulated automatic actuation test to demonstrate that the pair of diesel generators will start, accelerate, force parallel, and accept the emergency loads in the prescribed sequence. The ITS allows for use of an "actual" automatic initiation signal, in addition to the simulated automatic actuation signal, for verifying that each EDG starts on an automatic initiation signal.	SR 3.8.1.9, SR 3.8.1.10, SR 3.9.1.12	4.9.B.4	3
L5	The CTS provides a Completion Time of 8 hours when an EDG subsystem is inoperable to demonstrate, by manual start and force paralleling, the availability of the OPERABLE EDG subsystem or determine that the inoperability is due to preplanned maintenance or testing, an inoperable support system with no potential common mode failure, or an independently testable component with no potential common mode failure. In the ITS, the Completion Time has been extended to 24 hours to verify the remaining EDG is not inoperable due to a common cause failure.	3.8.1 Required Actions B.3.1 and B.3.2	4.9.B.5	6

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L6	The CTS has an action that allows for operation to continue for 60 days with one inoperable fuel oil transfer pump associated with a Diesel Generator subsystem provided the remaining fuel oil transfer pumps are demonstrated OPERABLE immediately and weekly thereafter. This action implies that all EDG subsystem fuel oil transfer pumps are required to be Operable. Each individual diesel generator is provided with an independent fuel oil system consisting of a main fuel oil storage tank, a day tank and two full-capacity motor-driven pumps which are designed to transfer fuel oil from the storage tank to the associated day tank automatically. Therefore, in the ITS, only one pump is required to be OPERABLE for each EDG, as stated in the Bases. Therefore, this specific CTS action has been deleted.	N/A	3.9.C.2.a	1
L7	CTS 3.0.E requires the plant to be in cold shutdown within 24 hours when a redundant feature is inoperable and the reserve or onsite power source of a system, subsystem, train, component or device is inoperable. The ITS will allow: a) 24 hours from discovery of no offsite power to one division concurrent with inoperability of redundant required feature(s) to declare required feature(s) with no offsite power available inoperable when the required feature(s) are inoperable; b) 4 hours from discovery of one inoperable EDG subsystem concurrent with inoperability of redundant required feature(s) to declare the required features supported by the inoperable EDG subsystem inoperable when the redundant required feature(s) are inoperable; and c) 12 hours from discovery of two offsite circuits inoperable concurrent with inoperability of redundant required feature(s) to declare required feature(s) inoperable when the redundant required feature(s) are inoperable. The ITS provides a restoration time whereas the CTS did not allow any restoration time, and the ITS allows the affected features to be declared inoperable and to take the actions of the individual Specifications in lieu of the automatic shutdown required by the CTS.	3.8.1 Required Actions A.2, B.2, and C.1	3.0.E	5
L8	The ITS includes a Note that allows gradual loading of the EDG as recommended by the manufacturer during the monthly load test.	SR 3.8.1.3 Note 1	N/A	3
L9	The ITS includes a Note that allows momentary load transients to be outside the load range and not invalidate performance of the monthly load test.	SR 3.8.1.3 Note 2	N/A	3
	3.8.2, AC SOURCES - SHUTDOWN			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires, when the required EDG subsystem and offsite power source are not Operable, suspension of all work that could cause draining of the reactor vessel, suspension of core alterations, suspension of handling of irradiated fuel assemblies in the secondary containment, initiating action to restore the inoperable AC source, and declaring required core and containment systems inoperable. In the ITS, when an offsite circuit is inoperable, the option of either suspending the above activities (and immediately initiating action to restore the offsite circuit to Operable status) or declaring the associated equipment that is not receiving offsite power inoperable is provided. In addition, when the EDG is inoperable, the option to declare the associated equipment inoperable is not allowed.	3.8.2 ACTIONS A and B	3.9.D	4
	3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR			
L1	The CTS allowance, to continue reactor operation indefinitely, if the affected fuel oil storage tank level is manually measured at least once per day when the fuel oil storage tank level indicator is found to be inoperable for any reason, is not retained in the ITS, since the fuel oil storage tank indicator is not an attribute of fuel oil Operability (the ITS requires the fuel oil level to be determined - the manner in which this is performed is not required to be specified in the ITS).	N/A	3.9.C.1	1
L2	The CTS allows that, if the available diesel fuel decreases below the required quantity as a result of operation of the diesel generators to meet Technical Specification requirements, Specification 3.0.C does not apply, and 48 hours are allowed to restore the required diesel fuel supply. In the ITS, 48 hours is provided to restore the diesel fuel supply to within limits, regardless of the reason it is not within limits.	3.8.3 ACTION A	3.9.C.3	4
L3	The CTS requires the EDG starting air compressor to be checked for operation and its ability to recharge air receivers. In the ITS, only the air receiver pressure is required to be verified to be within limits. The manner in which the air receivers are recharged is not an attribute of starting air Operability.	N/A	4.6.B.2	1, 3
	3.8.4, DC SOURCES - OPERATING			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the pilot cell voltage, specific gravity, overall voltage, and temperature to be measured immediately and daily thereafter for the Operable battery and requires the availability of the unaffected Emergency Diesel Generator System to be demonstrated, when one 125 VDC battery is inoperable. Similarly, the CTS requires the performance of additional Surveillances on the Operable LPCI MOV independent power supply subsystem if one LPCI MOV independent power supply subsystem is inoperable. These verifications are not required in the ITS.	N/A	3.9.E.2.b, 3.9.E.2.c, 3.9.F.2.b	3
L2	Not used.	N/A	N/A	N/A
L3	The CTS allows power operation to continue with an inoperable 125 VDC battery if the distribution system associated with the Operable 125 VDC electrical power subsystem battery is Operable. Similarly, the CTS allows power operation to continue with an inoperable LPCI independent power supply if the inverter and distribution system associated with the Operable LPCI independent power supply is Operable. The ITS does not retain these explicit requirements, since other Technical Specifications adequately control the Operability of the distribution subsystems.	N/A	3.9.E.2.a, 3.9.F.2.a	4
L4	No actions are provided in the CTS for when a 125 VDC battery charger is inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, a new ACTION (encompassed by the inoperable 125 VDC source ACTION) is provided to allow one charger to be inoperable for up to 8 hours prior to requiring a plant shutdown.	3.8.4 ACTION A	N/A	5
L5	The CTS requirement to open the battery charger output breakers once per month and observe performance for proper operation has been deleted since the 125 VDC battery charger output breaker is not required to open during any accident sequence.	N/A	4.9.E.7	3
L6	The CTS requires that if one independent power supply becomes inoperable, the inoperable independent power supply must be isolated from its associated LPCI MOV bus, and this bus be manually switched to its alternate power source. If this cannot be met, a plant shutdown to cold shutdown is required. This requirement is not maintained in the ITS since the CTS allows a 7 day Completion Time for any other LPCI subsystem inoperability with no other compensatory actions.	N/A	4.9.F.2.c	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L7	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4. In addition, the CTS requires the plant to be in cold shutdown within 24 hours if both LPCI MOV Independent Power Supplies are inoperable. In the ITS, the associated LPCI subsystems must be declared inoperable, and once declared inoperable, 36 hours is provided to place the plant in Mode 4.	3.8.4 Required Actions B.2 and C.1	3.9.E, 3.9.F.3, 3.9.F.2	6
L8	The CTS requirement to perform CTS 4.9.E.3 and 4.9.E.4 during shutdown has been included in the ITS. However, the ITS includes an allowance that portions of the Surveillance can be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced and that credit for unplanned events can be taken to satisfy this SR.	SR 3.8.4.3 SR 3.8.4.4	4.9.E.3, 4.9.E.4	3
3.8.5, DC SOURCES - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.8.6, BATTERY CELL PARAMETERS				
L1	Not used.	N/A	N/A	N/A
L2	The CTS requirement to measure electrolyte temperature of each pilot cell every 7 days is not being included in the ITS.	N/A	4.9.E.1, 4.9.F.1	3
L3	The CTS requirement to measure the temperature of every fifth cell every 92 days, is being changed. The ITS requires the average electrolyte temperature of representative cells (10% of the total) be verified within limits every 92 days. This change reduces the number of cells tested from 12 to 6 based on a total of 60 cells in the 125 VDC batteries and from 38 to 19 based on a total of 186 cells in the 419 VDC LPCI MOV independent power supply batteries.	SR 3.8.6.3	4.9.E.2.c, 4.9.F.2.c	3
3.8.7, DISTRIBUTION SYSTEMS - OPERATING				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	No actions are provided in the CTS for when an AC or 125 VDC distribution bus is inoperable; thus a plant shutdown to cold shutdown is required. In the ITS, new ACTIONS are provided to: a) allow AC distribution buses to be inoperable for up to 8 hours, provided a loss of function does not occur, prior to requiring a plant shutdown; and b) allow one 125 VDC distribution bus to be inoperable for up to 8 hours prior to requiring a plant shutdown. In addition, a maximum time the LCO cannot be met is also provided (16 hours).	3.8.7 ACTIONS A and B	N/A	5
L2	When a plant shutdown is required, the CTS requires the plant to be in cold shutdown (Mode 4) within 24 hours. In the ITS, 36 hours are provided to place the plant in Mode 4.	3.8.7 Required Action C.2	3.0.C	6
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.1, REFUELING EQUIPMENT INTERLOCKS			
L1	The CTS requires a functional test required following any repair work associated with the interlock. This specific post maintenance testing is not retained in the ITS.	N/A	4.10.A.1	3
L2	The CTS Applicability for the refueling interlocks is "during Core Alterations". The ITS Applicability is "during in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position". The ITS Applicability requires that the refueling equipment interlocks be Operable only during those situations when the interlocks are assumed to operate to prevent inadvertent criticality, i.e., in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position. In addition, a new default ACTION has been added for the condition when one or more required refueling equipment interlocks are inoperable. Two options are provided; a) the immediate suspension of in-vessel fuel movement with equipment associated with the inoperable interlocks, or b) the immediate insertion of a control rod withdrawal block and the immediate verification that all control rods are fully inserted.	3.9.1 Applicability, 3.9.1 Required Actions A.1 and A.2	3.10.A.1	2, 4
L3	The CTS requires the refueling interlocks be functionally tested prior to any fuel handling with the head off and at a weekly interval thereafter. The ITS does not include the "prior to" frequency since it is redundant to the SR 3.0.1 requirements.	N/A	4.10.A.1	3
	3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK			
L1	The CTS Applicability for the one-rod-out interlock is "during Core Alterations". The ITS Applicability is "MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn." The ITS Applicability requires that the "one-rod-out interlock" be operable only during those situations when the interlock is assumed to operate to prevent inadvertent criticality, i.e., the mode switch in refuel and any control rod withdrawn.	3.9.2 Applicability	3.10.A.1	2
L2	The CTS requires the one-rod-out interlock be functionally tested prior to any fuel handling with the head off and at a weekly interval thereafter. The ITS includes a Note that allows deferring the performance of this functional test "until one hour after any control rod is withdrawn." This allowance is necessary because the test is performed by entering the applicable condition (i.e., a control rod must be withdrawn from its full-in position) and attempting to withdraw a second control rod.	SR 3.9.2.2 Note	4.10.A.1	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The CTS requires a functional test required following any repair work associated with the interlock. This specific post maintenance testing is not retained in the ITS.	N/A	4.10.A.1	3
L4	The CTS requires the refueling interlocks be functionally tested prior to any fuel handling with the head off and at a weekly interval thereafter. The ITS does not include the "prior to" frequency since it is redundant to the SR 3.0.1 requirements.	N/A	4.10.A.1	3
3.9.3, CONTROL ROD POSITION				
NONE	NONE	NONE	NONE	NONE
3.9.4, CONTROL ROD POSITION INDICATION				
NONE	NONE	NONE	NONE	NONE
3.9.5, CONTROL ROD OPERABILITY - REFUELING				
NONE	NONE	NONE	NONE	NONE
3.9.6, REACTOR PRESSURE VESSEL WATER LEVEL				
NONE	NONE	NONE	NONE	NONE
3.9.7, RESIDUAL HEAT REMOVAL - HIGH WATER LEVEL				
NONE	NONE	NONE	NONE	NONE
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 Months to 24 Months

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION			
L1	The CTS requires the inservice leak and hydrostatic testing operations to be suspended immediately when the requirements of CTS 3.12.A are not met. The ITS includes an alternative action to allow entry into the applicable Conditions of the affected LCO if any requirement of ITS LCO 3.10.1 is not met. In addition, a Note has been added to clarify that if an affected Specifications ACTIONS state to be in MODE 4, this includes reducing average coolant temperature to ≤ 212°F. Along with this change a NOTE has been added to the ACTIONS Table which allows separate Condition entry for each requirement of the LCO. In conjunction with proposed Specification 1.3 - "Completion Times," the Note ("Separate condition entry ...") and the Conditions of ITS 3.10.1 provide more explicit direction for the use of the ITS.	3.10.1 ACTIONS Note, 3.10.1 Required Action A.1, including Note	3.12.A.6	4, 5
L2	The CTS requires the plant to immediately reduce coolant temperature to less than 212°F whenever any requirement of CTS 3.12.A is not met. The ITS requires the reduction in reactor coolant temperature to ≤ 212°F. The Applicability of this Specification is when reactor coolant temperature is > 212°F, therefore, reducing the coolant temperature as specified in the ITS places the plant outside the Applicability of this Specification.	3.10.1 Required Action A.2.2	3.12.A.6	5
	3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING			
L1	ITS 3.10.2 is added to allow reactor mode switch interlock testing to be conducted by placing the reactor mode switch in run, startup/hot standby, or refuel as applicable, while in MODES 3, 4, or 5 and not consider the plant to be in MODE 1 or 2, as applicable. This testing can proceed only if there are no Core Alterations in progress, and if all control rods remain fully inserted in core cells containing one or more fuel assemblies. When these two conditions are met, the situation is equivalent to maintaining the reactor mode switch in shutdown. Control rods are not required to be inserted in empty core cells (i.e., those containing no fuel) because, with one or more core cells in this configuration, the Shutdown Margin is actually greater than when all control rods and all fuel assemblies are inserted.	3.10.2	N/A	1
	3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	ITS 3.10.3 has been added to allow the reactor mode switch to be placed in the refuel position, allow a single control rod to be withdrawn, and still be considered to be in MODE 3, provided certain MODE 5 requirements are met. Currently, rods are not allowed to be withdrawn while in MODE 3. These additional requirements ensure that the one-rod-out interlock is Operable so that: 1) only the one rod is withdrawn, 2) all other control rods are fully inserted, and 3) RPS and control rod MODE 5 operability requirements are met or all other rods in a 5 x 5 array centered on the withdrawn rod are disarmed, allowing a modification to the way in which SDM is met. These additional requirements effectively compensate for the reactor mode switch not being in the shutdown position with a rod withdrawn.	3.10.3	N/A	1
3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN				
L1	ITS 3.10.4 has been added to allow the reactor mode switch to be placed in the refuel position, allow a single control rod to be withdrawn and its associated control rod drive removed, and still be considered to be in MODE 4, provided certain MODE 5 requirements are met. Currently, rods are not allowed to be withdrawn while in MODE 4. These additional requirements ensure that the one-rod-out interlock is Operable or a control rod withdrawal block is inserted so that: 1) only the one rod is withdrawn, 2) all other control rods are fully inserted, and 3) RPS and control rod operability MODE 5 requirements are met or all other rods in a 5 x 5 array centered on the withdrawn rod are disarmed, allowing a modification to the way in which SDM is met. These additional requirements effectively compensate for the reactor mode switch not being in the shutdown position with a rod withdrawn.	3.10.4	N/A	1
3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The CTS requires the reactor mode switch to be locked in the refuel position and all refueling interlocks operable except for those necessary to perform the demonstration and maintenance described in CTS 4.10.D.1 when two control rods are withdrawn to perform maintenance. The ITS will allow the requirements of LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.9.2, "Refuel Position One-Rod-Out Interlock"; and LCO 3.9.4, "Control Rod Position Indication" be suspended in MODE 5 to allow the removal of a single CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies, provided the following requirements are met: 1) all other control rods are fully inserted (as modified by DOC M1); 2) all other control rods in a five by five array centered on the withdrawn control rod are disarmed (as modified by DOC M2); 3) a control rod withdrawal block is inserted and LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 5 requirements, may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod (as modified by DOC L2); and 4) no other CORE ALTERATIONS are in progress (as modified by DOC A2). This ITS LCO will not require the Operability of any refueling interlock and will not require the mode switch to be locked in the refuel position. In addition, since the requirements of ITS LCOs 3.9.1 and 3.9.2 may be suspended during the application of this Special Operations LCO, the associated Surveillances of these LCOs are not applicable; therefore, the CTS requirement to perform the Surveillance Requirements of CTS 4.10.A.1 have also been deleted.	LCO 3.10.5	3.10.D.1.a, 4.10.D.1.a	1, 3
L2	The CTS requires the performance of a shutdown margin (SDM) demonstration and that adequate margin is maintained during the maintenance with the analytically determined strongest worth operable control rod fully withdrawn. This demonstration shall be performed after CTS 3.10.D.1 has been satisfied, but prior to the withdrawal of the control rods for maintenance. The CTS also allows up to two control rods with fuel assemblies loaded into the associated core cells to be withdrawn. Therefore, adequate SDM should be maintained throughout the maintenance work with these two rods and the analytically determined strongest worth operable control rod withdrawn. The SDM demonstration is currently required to be performed prior to performing any maintenance. The ITS requires SR 3.1.1.1, the SDM verification, to be performed in accordance with its associated surveillance frequency. The ITS allows withdrawal of only one control rod from core cells containing fuel (as modified by DOC M1). Withdrawal/removal of multiple control rods is only allowed in accordance with ITS 3.10.6, and then, only if all four fuel assemblies have been removed from the core cells associated with each control rod or control rod drive being removed. ITS SR 3.1.1.1 requires SDM to be verified to be within limits prior to each in-vessel fuel movement during a fuel loading sequence and once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement. In addition, the ITS 3.10.5.c allows the SDM verification to be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod. This change is less restrictive in two ways. SDM can be verified in accordance with the Frequency of SR 3.1.1.1 instead of demonstrated prior to maintenance and the verification can be met by allowing the single control rod to be withdrawn to be assumed to be the highest worth control rod.	LCO 3.10.5.c, SR 3.10.5.4	3.10.D.1.b, 4.10.D.1.b	1, 3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L3	The ITS includes an allowance to suspend the requirements for automatic scram capability during control rod and control rod drive maintenance. The ITS explicitly states that the requirements of LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"; LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring"; and LCO 3.9.5, "Control Rod OPERABILITY" may be suspended in MODE 5 to allow the removal of a single control rod sequent removal associate CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies provided: 1) all other control rods are fully inserted (as modified by DOC M1); 2) all other control rods in a five by five array centered on the withdrawn control rod are disarmed (as modified by DOC M2); 3) a control rod withdrawal block is inserted and LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 5 requirements, may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod (as modified by DOC L2); and 4) no other CORE ALTERATIONS are in progress.	LCO 3.10.5	N/A	1
3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING				
L1	During the removal or withdrawal of multiple control rods during refueling, the CTS requires the reactor mode switch to be locked in the Refuel position and the refueling interlocks associated with all control cells containing fuel are Operable. In addition, the CTS requires the refueling interlocks to be Operable for any control cell which contains fuel during spiral off-load or on-load. These requirements are not included in the ITS. ITS only requires that the reactor be in MODE 5 (mode switch in either shutdown or refuel) while the full-in position signal is defeated for multiple control rods that are withdrawn or removed.	LCO 3.10.6	3.10.A.5.a, 3.10.A.5.c, 3.10.A.6.a, 3.10.A.7.d	1
3.10.7, CONTROL ROD TESTING - OPERATING				
L1	ITS 3.10.7 has been added to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing, provided the banked position withdrawal sequence (BPWS) requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or reactor engineer. These two requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA). An appropriate ACTION and Surveillance Requirement have also been added.	3.10.7	N/A	1
3.10.8, SHUTDOWN MARGIN TEST - REFUELING				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The allowances in CTS 3.6.E.3 (S/RVs) to allow the equipment to be inoperable during low power physics tests provided that reactor coolant temperature is ≤ 212°F and the reactor vessel is vented (see M2) or the reactor vessel head is removed has been changed to MODE 5 with the reactor mode switch in startup/hot standby position (ITS 3.10.8 Applicability). In addition, the allowances in CTS 3.5.B.5 to allow component(s) of the Containment Cooling Mode of the RHR System to be inoperable during low power physics tests provided that reactor coolant temperature is ≤ 212°F has been changed in a similar manner. Similar changes have been made to Specifications associated with the primary containment (CTS 3.7.A.2), reactor building-to-suppression chamber vacuum breakers (CTS 3.7.A.4), suppression chamber-to-drywell vacuum breakers (CTS 3.7.A.5), primary containment isolation valves (CTS 3.7.D.1), and primary containment isolation functions (CTS 3.2.A and Table 3.2-1 Note 1). In these Specifications, explicit reference that the test must be performed at atmospheric pressure and at power levels not to exceed 5 MWt has been deleted. These changes are less restrictive in two ways: a) the first change deletes the explicit requirement to maintain reactor coolant temperature ≤ 212°F; and b) the second change involves a change in the definition made to the definition of the refuel mode.	3.10.8 Applicability	3.6.E.3, 3.5.B.5, 3.7.A.2, 3.7.A.4, 3.7.A.5, 3.7.D.1, 3.2.A, Table 3.2-1 Note 1	2
L2	The CTS requires equipment to be Operable during startup. There is no explicit definition of startup in the CTS 1.0, however, there is a definition for startup/hot standby. This definition has been modified as MODE 2 in the ITS as discussed in the Discussion of Changes for ITS Chapter 1.0. However, in the CTS, whenever the mode switch is placed in the startup/hot standby position all Technical Specification equipment required during startup must be Operable. ITS 3.10.8 allows the mode switch to be placed in startup/hot standby while the plant can still be considered to be in MODE 5 to allow SDM testing (which requires more than one control rod to be withdrawn), provided certain MODE 2 requirements are met. This change is less restrictive since certain CTS requirements will not be required to be operable to perform this Special Operations LCO. ITS 3.10.8 will additionally require the following requirements to be met: (a) LCO 3.3.1.1, "Reactor Protection System Instrumentation", MODE 2 requirements for Functions 2.a and 2.d of Table 3.3.1.1-1 (as modified by DOC A4); (b) LCO 3.3.2.1, "Control Rod Block Instrumentation", MODE 2 requirements for Function 2 of Table 3.3.2.1-1, with the Banked Position Withdrawal Sequence requirements of SR 3.3.2.1.8 changed to require the control rod sequence to conform to the SDM test sequence, or conformance to the approved control rod sequence for the SDM test is verified by a second licensed operator or other qualified member of the technical staff; (c) each withdrawn control rod shall be coupled to the associated CRD; (d) all control rod withdrawals during out of sequence control rod moves shall be made in notch out mode; (e) no other CORE ALTERATIONS are in progress; and (f) CRD charging water header pressure ≥ 940 psig. Also, appropriate ACTIONS and Surveillance Requirements have been added.	3.10.8	3.5.A, 3.5.J, 3.6.B, 3.6.G, 3.3.B.3, 3.3.A	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L1	The ITS includes an allowance for a limited number of lead test assemblies that have not completed representative testing to be placed in non-limiting core regions. This allowance provides recognition of a specific kind of special test with lead test assemblies that may be performed.	4.2.1	N/A	1
L2	The CTS requires that each fuel assembly consist of Zircaloy clad fuel rods. The ITS also allows the use of either Zircaloy or ZIRLO clad fuel rods. The allowance to use either Zircaloy or ZIRLO clad fuel rods has been generically approved by the NRC. In addition, prior to use of ZIRLO fuel clad, the ITS requires that JAFNPP analyze the fuel design using NRC approved codes and methods and also ensure that the fuel design complies with all safety design bases.	4.2.1	5.2.1	1

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	5.1, RESPONSIBILITY			
NONE	NONE	NONE	NONE	NONE
	5.2, ORGANIZATION			
L1	Not used.	N/A	N/A	N/A
	5.3, PLANT STAFF QUALIFICATIONS			
NONE	NONE	NONE	NONE	NONE
	5.4, PROCEDURES			
NONE	NONE	NONE	NONE	NONE
	5.5, PROGRAMS AND MANUALS			
L1	The CTS requirement that certain SGT System filter tests be performed at a Frequency of "at least once during each scheduled secondary containment leak rate test," is not retained in the ITS.	N/A	4.7.B.1.b	3
L2	The CTS CREVAS filter bank pressure drop tests, HEPA filter in-place DOP tests, and the charcoal adsorber in-place bypass leakage tests and the SGT System HEPA filter in-place DOP tests and the charcoal adsorber in-place bypass leakage tests have been extended from 6 months to 24 months.	5.5.8	4.7.B.1.b, 4.11.A.1	3
L3	The CTS requires that the SGT pressure drop test be performed at a flowrate of 6,000 scfm. The ITS requires that this test be performed at a flowrate of 5400 to 6600 scfm.	5.5.8.d	4.7.B.1.a(1)	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The ITS provides an allowance for the application of SR 3.0.3 to the IST Program requirements. This change, which applies SR 3.0.3 to the existing requirements, allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.7	N/A	4
L5	The ITS includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to the Primary Coolant Sources Outside Containment Program. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.2	N/A	3, 4
L6	The ITS includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to the Storage Tank Radioactivity Monitoring Program. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency.	5.5.9	N/A	3, 4
L7	The CTS requirement to perform a pressure drop test across each filter in the Main Control Room Ventilation system is being deleted.	N/A	4.11.A.1.a	3
	5.6, REPORTING REQUIREMENTS			
L1	The CTS requires that, "at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions." The ITS changes the word "shall" to "should."	5.6.1	6.9.A.2.a	1
L2	The RETS requires that the Annual Radiological Environmental Operating Report be submitted prior to May 1 of each year. The ITS requires this report to be submitted by May 15 of each year.	5.6.2	RETS 7.3.d	1
L3	The RETS requires that the Radioactive Effluent Release Report be submitted on a semiannual basis. The ITS requires that this report be submitted in accordance with 10 CFR 50.36a, on an annual basis.	5.6.3	RETS 7.3.c	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L4	The CTS requires an annual report of safety/relief valve (S/RV) failures and challenges to be submitted prior to March 1 of each year. This specific requirement has been deleted. The NRC has stated in approving TSTF-258, Revision 4 that this specific report is not necessary. This is an after-the-fact report and there is no requirement for the NRC to approve the report. Completion and submittal of the report is clearly not necessary to ensure safety operation of the plant. Other Technical Specifications provide adequate actions if an S/RV fails and is inoperable.	N/A	6.9.A.2.b	9
5.7, HIGH RADIATION AREA				
L1	The CTS, which provides high radiation area access control alternatives pursuant to 10 CFR 20.203(c)(2) (revised 10 CFR 20.1601(c)), has been significantly revised as a result of the changes to 10 CFR 20, the guidance provided in Regulatory Guide 8.38 (Control of Access to High and Very High Radiation Areas in Nuclear Power Plants), and current industry technology in controlling high radiation areas. The changes incorporated in ITS 5.7 (which are consistent with TSTF-258, Revision 4) include: a) a capping dose rate to differentiate a high radiation area from a very high radiation area, b) additional requirements for groups entering high radiation areas, and c) clarification of the need for control of workers in high radiation areas.	5.7	6.11(A)	1
CTS 6.0, ADMINISTRATIVE CONTROLS				
NONE	NONE	NONE	NONE	NONE
RETS 2.1, LIQUID EFFLUENT MONITORS				
NONE	NONE	NONE	NONE	NONE
RETS 2.2, CONCENTRATION OF LIQUID EFFLUENTS				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
RETS 2.3, DOSE FROM LIQUID EFFLUENTS				
NONE	NONE	NONE	NONE	NONE
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS				
NONE	NONE	NONE	NONE	NONE
RETS 3.1, GASEOUS EFFLUENT MONITORS				
NONE	NONE	NONE	NONE	NONE
RETS 3.2, GASEOUS DOSE RATES				
NONE	NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES				
NONE	NONE	NONE	NONE	NONE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM				
NONE	NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

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

CHANGE TYPE

1. Relaxation of LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail

5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement

ATTACHMENT 5

Table LA - Removal Of Details Matrix

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
2.0 - LA1	6.7.(B), 6.7.(C)	The requirements that the Chief Nuclear Officer, the Director Regulatory Affairs and Special Projects, and the Chairman of the SRC be notified within 24 hours after a safety limit is violated. The requirements that the PORC shall prepare a complete investigative report of each safety limit violation and the contents of the report.	TRM	10 CFR 50.59	3
2.0 - LA2	1.1.D	The detail that the reactor water level safety limit applies when irradiated fuel is in the reactor vessel.	Bases	Bases Control Program	1

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.1, SHUTDOWN MARGIN					
3.1.1 - LA1	4.3.A.1	Details of the method to perform the CTS 4.3.A.1 (e.g., sufficient control rods shall be withdrawn) and the details of the requirements in CTS 3.3.A.1 and 4.3.A.1 (e.g., that the shutdown margin shall be met at any time in the subsequent fuel cycle).	Bases	Bases Control Program	3
3.1.2, REACTIVITY ANOMALIES					
3.1.2 - LA1	4.3.D	Details of the method to perform the Surveillance and the purposes for the Reactivity Anomalies Surveillance (that the comparison will be used as the base for future reactivity anomaly checks).	Bases	Bases Control Program	3
3.1.3, CONTROL ROD OPERABILITY					
3.1.3 - LA1	4.3.A.2.d	The requirement that an attempt should be made to fully insert a control rod if it is initially determined to be incapable of normal insertion.	Plant Procedures	FitzPatrick procedure control process	3
3.1.3 - LA2	3.3.A.2.b, 3.3.B.1	Details of the methods for disarming CRDs.	Bases	Bases Control Program	3
3.1.3 - LA3	4.3.A.2.f	The method used to determine the position of each control rod (an instrument check of control rod position indication).	Bases	Bases Control Program	3
3.1.4, CONTROL ROD SCRAM TIMES					
3.1.4 - LA1	4.3.C.2	The CTS requires "10% of the control rods" to be scram time tested. This has been changed to "representative sample" and the details of what constitutes a representative sample (i.e., at least 10% of the control rods) has been relocated.	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.5, CONTROL ROD SCRAM ACCUMULATORS					
NONE	NONE	NONE	NONE	NONE	NONE
3.1.6, ROD PATTERN CONTROL					
3.1.6 - LA1	3.3.B.3.e	The detailed reasons for control rod patterns being equivalent to those prescribed by the BPWS (i.e., such that the drop of any in-sequence control rod would not result in a peak fuel enthalpy greater than 280 calories/gm).	Bases	Bases Control Program	1
3.1.7, STANDBY LIQUID CONTROL SYSTEM					
3.1.7 - LA1	4.4.A.2, 4.4.A.3, 4.4.A.4, 4.4.A.5	The details of the method for performing the SLC pump flow test (by recirculating demineralized water to the test tank); the details of the method for demonstrating all piping between the SLC storage tank and the pump suction is unblocked (by manually initiating the system, except the explosive valves and pump solution in the recirculation path); the details of the method for testing the explosive valves (to explode one of three primer assemblies manufactured in the same batch to verify proper function and then the replacement primer assembly to the one fired in the flow test must be from the same batch previously tested); and the details of the method for verifying flow through the SLC subsystem into the reactor pressure vessel (to test that valves, except explosive valves, not checked by the recirculation test are not clogged).	Bases	Bases Control Program	3
3.1.7 - LA2	4.4.A.6, 4.4.A.7	The requirements to verify the proper operation and setpoints of the relief valves and to disassemble and inspect one explosive valve.	IST Program	10 CFR 50.59	3
3.1.7 - LA3	3.4.C	The detailed information concerning the boron solution for the SLC storage tank, and what support components and variables are required to assure SLC OPERABILITY is maintained.	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.7 - LA4	Figure 3.4-2	The detail that the saturation temperature of enriched sodium pentaborate solution curve includes a 10°F margin.	Bases	Bases Control Program	1
3.1.7 - LB1	4.4.C.3	The requirements to calibrate the temperature and level elements.	TRM	10 CFR 50.59	3
3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES					
3.1.8 - LA1	4.3.A.2.e	The requirement concerning the scram discharge volume drain and vent valve closure time criteria (30 seconds).	IST Program	10 CFR 50.59	3

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE					
3.2.1 - LA1	3.5.H	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3
3.2.1 - LA2	3.5.H, 4.5.H	The details related to APLHGR and APLHGR limits.	Bases	Bases Control Program	3
3.2.2, MINIMUM CRITICAL POWER RATIO					
3.2.2 - LA1	3.1.B	The CTS requirement that during reactor power operation with core flow less than 100% of rated, the MCPR operating limit shall be multiplied by the appropriate K_f as specified in the COLR (the actual value of K_f is remaining in the COLR).	Bases	Bases Control Program	3
3.2.2 - LA2	3.1.B	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3
3.2.3, LINEAR HEAT GENERATION RATE					
3.2.3 - LA1	3.5.I	The detail that specifies that the linear heat generation rate (LHGR) is at any rod in any fuel assembly at any axial location.	Bases	Bases Control Program	1
3.2.3 - LA2	3.5.I	The details that require action be initiated within 15 minutes to restore operation to within prescribed limits are being relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within limits.	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.4, APRM GAIN AND SETPOINT					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.1, RPS INSTRUMENTATION					
3.3.1.1 - LA1	1.0.Z, 2.1.A.2, Table 3.1-1	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.1.1 - LA2	Table 3.1-1	The information in the column "Total Number of Instrument Channels Provided by Design for Both Trip Systems."	Bases	Bases Control Program	1
3.3.1.1 - LA3	Table 3.1-1 Notes 13 and 15	The detail stating that the APRM Neutron Flux-Startup scram function is a fixed point and is increased when the reactor mode switch is placed in the Run position, and the detail stating that the APRM Flow Referenced Neutron Flux scram function is varied as a function of recirculation flow (W).	Bases	Bases Control Program	1
3.3.1.1 - LA4	Table 3.1-1 Note 10	The requirement that an APRM will be considered inoperable if there are less than 2 LPRM inputs per level or less than 11 Operable LPRM detectors to an APRM.	Bases	Bases Control Program	2
3.3.1.1 - LA5	Table 3.1-1 Note 6	The statement regarding the Main Steam Line Isolation Valve Closure and Turbine Stop Valve Closure Functions design that permits closure of any two lines without a scram being initiated.	Bases	Bases Control Program	1
3.3.1.1 - LA6	Table 3.1-1	The detail regarding the physical location of the Turbine Control Valve Fast Closure Function's pressure switches.	Bases	Bases Control Program	1
3.3.1.1 - LA7	Table 3.1-1 footnote *	The details concerning conditions and precautions for placing an inoperable channel or trip system in trip.	Bases	Bases Control Program	2
3.3.1.1 - LA8	Table 4.1-1	The detail on how to perform a Functional Test of the Mode Switch in Shutdown Function (place the Mode Switch in shutdown).	Bases	Bases Control Program	3
3.3.1.1 - LA9	Table 4.1-1 Note 1	The detail that describes how to exercise the automatic scram contactors (by performing a functional test of an automatic scram function or by using the RPS Channel Test Switch).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.1.1 - LA10	Table 3.1-1 Note 16	The detail that the RPS Drywell High Pressure and Reactor Low Water Level instrumentation is common to the PCIS.	UFSAR	10 CFR 50.59	1
3.3.1.1 - LA11	Table 4.1-1 Note 6, Table 4.1-2 Note 5	The method for performing the Functional Test and Calibration (utilizing a water column or similar device to provide assurance that damage to a float or other portions of the float assembly will be detected).	Bases	Bases Control Program	3
3.3.1.1 - LA12	Table 4.1-1, Table 4.1-2	The listing of the Turbine First Stage Pressure Permissive as an attribute of the Turbine Stop Valve Closure and Turbine Control Valve Fast Closure Functions.	Bases	Bases Control Program	1
3.3.1.1 - LA13	Table 3.1-1 footnote **	The requirement that, with channels in both trip systems inoperable, the trip system with the greatest number of inoperable channels be the trip system that is placed in trip.	Bases	Bases Control Program	3
3.3.1.1 - LA14	4.1.A footnote *	The allowance that the sensor is eliminated from response time testing for the RPS actuation logic circuits for Reactor High Pressure and Reactor Water Level - Low Functions.	Bases	Bases Control Program	3
3.3.1.1 - LA15	Tables 3.1-1, 4.1-1, 4.1-2	The details that the measured level for the SDV Hight Water Level Scram Function is in the instrument volume portion of the SDV.	Bases	Bases Control Program	1
3.3.1.2, SRM INSTRUMENTATION					
3.3.1.2 - LA1	3.10.B.1	The requirement that the SRMs be inserted to the normal operating level during Core Alterations.	Bases	Bases Control Program	2
3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION					
3.3.2.1 - LA1	Table 3.2-3	The information in the column "Total Number of Instrument Channels Provided by Design."	Bases	Bases Control Program	1
3.3.2.1 - LA2 4.3.B.3.b.2	4.3.B.3.a.2 4.3.B.3.a.3	The RWM computer on line diagnostic test and the proper annunciation of the selection error Surveillances.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.2.1 - LA3	4.3.B.3.a.4	The method of performing the RWM Channel Functional Test (by withdrawing an out-of-sequence control rod no more than to the block point, then reinserting the subject rod).	Bases	Bases Control Program	3
3.3.2.1 - LA4	N/A	Not used.	N/A	N/A	N/A
3.3.2.1 - LA5	Table 3.2-3	The detail that the RBM is flow biased.	Bases	Bases Control Program	1
3.3.2.1 - LA6	3.3.B.3.a 3.3.B.3.c	The detail that the second individual be a "reactor" or "senior" operator or a "reactor engineer" and the detail that when the RWM is inoperable and a control rod is being moved, the individual moving the rod shall comply with BPWS and have no other concurrent duties during the rod withdrawal or insertion.	Bases	Bases Control Program	3
3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION					
3.3.2.2 - LA1	1.0.Z, Table 3.2-6	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.3.1, PAM INSTRUMENTATION					
3.3.3.1 - LA1	Table 3.2-8	The information in the column "No. of Instrument Channels Provided by Design."	Bases	Bases Control Program	1
3.3.3.1 - LA2	Table 3.2-8 Note F	The requirement that, with the Primary Containment Hydrogen/Oxygen monitor inoperable, operation for 30 days is permissible "provided at least once per 24 hours, either the appropriate parameter(s) is monitored and logged using 27PCX-101A/B, or an appropriate grab sample is obtained and analyzed."	TRM	10 CFR 50.59	3
3.3.3.1 - LA3	N/A	Not used.	N/A	N/A	N/A

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.3.2, REMOTE SHUTDOWN SYSTEM					
3.3.3.2 - LA1	N/A	Not used.	N/A	N/A	N/A
3.3.3.2 - LA2	Table 3.2-10, including Note 1	The information in the columns "Instrument or Control" and "Panel or Location" and the statement that the minimum number of divisions for all instruments and controls is 1.	TRM	10 CFR 50.59	1
3.3.4.1, ATWS-RPT INSTRUMENTATION					
3.3.4.1 - LA1	Table 3.2-7, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.4.1 - LA2	Table 3.2-7 footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.5.1, ECCS INSTRUMENTATION					
3.3.5.1 - LA1	Table 3.2-2	The information in the column "Remarks."	Bases	Bases Control Program	1
3.3.5.1 - LA2	Table 3.2-2, including Note 16	The information concerning how many trip systems each Function is associated with.	Bases	Bases Control Program	1
3.3.5.1 - LA3	Table 3.2-2	The detail that the trip level setting (changed to Allowable Value) for the Condensate Storage Tank Low Level is equivalent to 15,600 gallons available.	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.5.1 - LA4	Table 3.2-2, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.5.2, RCIC SYSTEM INSTRUMENTATION					
3.3.5.2 - LA1	Table 3.2-2, including Note 16	The information in the column "Minimum No. of Operable Instrument Channels per Trip System" and that RCIC Reactor High Water Level Trip Function include only one trip system.	Bases	Bases Control Program	1
3.3.5.2 - LA2	Table 3.2-2	The information in the column "Remarks."	Bases	Bases Control Program	1
3.3.5.2 - LA3	Table 3.2-2	The detail that the trip level setting (changed to Allowable Value) for the Condensate Storage Tank Low Level is equivalent to 15,600 gallons available.	Bases	Bases Control Program	1
3.3.5.2 - LA4	Table 3.2-2, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION					
3.3.6.1 - LA1	Tables 3.2-1 and 3.2-8	The information in the column "Total Number of Instrument Channels Provided by Design for Both Trip Systems."	Bases	Bases Control Program	1
3.3.6.1 - LA2	Table 3.2-1 Footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.1 - LA3	Table 3.2-1 Actions 3.C, 3.D, and 3.E, Table 3.2-8 Footnote *	The Systems isolated by certain instruments.	Bases	Bases Control Program	1
3.3.6.1 - LA4	Table 3.2-8 Note 8	The details of the logic and penetrations isolated by the Reactor Low Water Level and Drywell High Pressure Trip Functions.	Bases	Bases Control Program	1
3.3.6.1 - LA5	Table 4.2-1	The details of which valves are isolated by the various instruments during Logic System Functional Tests.	Bases	Bases Control Program	1
3.3.6.1 - LA6	Table 3.2-1 Note 7	The detail that the Reactor Low Water Level and Drywell High Pressure Functions are common to the RPS Instrumentation.	Bases	Bases Control Program	1
3.3.6.1 - LA7	Table 4.2-1 thru 4.2.-5 Note 11	The methods for performing a detector calibration and a Channel Calibration (using a radiation source and a current source, respectively).	Bases	Bases Control Program	3
3.3.6.1 - LA8	Table 3.2-2 Item 10, including Notes 2 and 12, Table 4.2-2 Instrument Channel 3a)	The Reactor Low Pressure Trip Function requirements.	TRM	10 CFR 50.59	3
3.3.6.1 - LA9	Table 3.2-1, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1
3.3.6.1 - LA10	N/A	Not used.	N/A	N/A	N/A
3.3.6.1 - LA11	Table 3.2-1 Note 2.b	The detail of what constitutes PCIS Initiation capability (for at least one containment isolation valve in the affected penetration).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.1 - LA12	4.2.A footnote *	The details that the sensors for the Reactor Low Water Level (Level 1), Low Steam Line Pressure, and High Steam Line Flow Functions are eliminated from response time testing of the MSIV actuation logic circuits.	Bases	Bases Control Program	3
3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION					
3.3.6.2 - LA1	Table 3.2-1, RETS Table 3.10-1	The information in the columns "Total Number of Instrument Channels Provided by Design for Both Trip Systems" and "Total Number of Instrument Channels Provided by Design."	Bases	Bases Control Program	1
3.3.6.2 - LA2	Table 3.2-1 Note 1.a (including footnote *), RETS Table 3.10-1 Note a	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.6.2 - LA3	RETS Table 3.10-1 Note b	The detail that the Reactor Building and Refuel Areas Exhaust Monitor channel's Trip Level Setting (changed to Allowable Value) is in accordance with the methods and procedures of the ODCM and that the Function includes the isolation capability.	Bases	Bases Control Program	2
3.3.6.2 - LA4	Table 3.2-1 Note 4	The detail that the Reactor Low Water Level and Drywell High Pressure Functions start the SGT System and initiate secondary containment isolation.	Bases	Bases Control Program	1
3.3.6.2 - LA5	Table 3.2-1 Note 7	The detail that the Reactor Low Water Level and Drywell High Pressure Functions are common to the RPS Instrumentation.	Bases	Bases Control Program	1
3.3.6.2 - LA6	Table 3.2-1, 1.0.Z	The detail that the top of active fuel, which corresponds to the top of the enriched fuel column of each fuel bundle, is located 352.5 inches above vessel zero, which is the lowest point in the inside bottom of the reactor pressure vessel. The detail that the Trip Level Setting of the Reactor Low Water Level Function is referenced from the top of active fuel.	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.6.2 - LA7	Table 3.2-1 Note 2.b	The detail of what constitutes PCIS (i.e., Secondary Containment) Initiation capability (for at least one containment isolation valve in the affected penetration).	Bases	Bases Control Program	3
3.3.7.1, CREVAS SYSTEM INSTRUMENTATION					
NONE	NONE	NONE	NONE	NONE	NONE
3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION					
3.3.7.2 - LA1	Table 3.2-1, RETS Table 3.10-1	The information in the columns "Total Number of Instrument Channels Provided by Design for Both Trip Systems" and "Total Number of Instrument Channels Provided by Design."	Bases	Bases Control Program	1
3.3.7.2 - LA2	Table 4.2-1 thru Table 4.2-5, Note 11	The methods for performing a detector calibration and a Channel Calibration (using a radiation source and a current source, respectively).	Bases	Bases Control Program	3
3.3.7.2 - LA3	Table 3.2-1 Note 1.a footnote *	The allowance that an inoperable channel or trip system need not be placed in trip when this would cause the trip function to occur.	Bases	Bases Control Program	3
3.3.7.3, ESW SYSTEM INSTRUMENTATION					
3.3.7.3 - LA1	3.11.D.1	The statement that the ESW System ensures adequate equipment and area cooling.	Bases	Bases Control Program	1
3.3.8.1, LOP INSTRUMENTATION					

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.3.8.1 - LA1	Table 3.2-2, including Notes 13, 14, and 15	The information in the column "Remarks," that the trip level setting (changed to Allowable Value) units are based on the secondary volts, the correlation of secondary voltage to primary voltage, and the actions of the LOP Instrumentation (i.e., what the instrumentation actuates).	Bases	Bases Control Program	1, 2
3.3.8.2, RPS ELECTRIC POWER MONITORING					
3.3.8.2 - LA1	4.9.G.2	The details of what constitutes a system functional test.	Bases	Bases Control Program	3

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.1, RECIRCULATION LOOPS OPERATING					
3.4.1 - LA1	3.5.K.2	The requirements that during resumption of two-loop operation following a period of single-loop operation, the discharge valve of the lower speed pump not be opened unless the speed of the faster pump is less than 50 percent of its rated speed.	TRM	10 CFR 50.59	2
3.4.2, JET PUMPS					
3.4.2 - LA1	4.6.G.A	The details to obtain base line data for single loop operation.	Bases	Bases Control Program	3
3.4.3, SAFETY/RELIEF VALVES					
3.4.3 - LA1	4.6.E.2	The requirement to disassemble and inspect one safety/relief valve every 24 months.	UFSAR	10 CFR 50.59	3
3.4.3 - LA2	4.6.E.4	The methods for verifying the safety/relief valves have opened (i.e., while bypassing steam to the condenser, etc) and the detail that the test must be performed in Run.	Bases	Bases Control Program	3
3.4.3 - LA3	4.6.E.1	The requirement that at least 5 of the 11 S/RVs be bench checked or replaced with bench checked valves every 24 months; and that all valves be tested every 48 months.	IST Program	10 CFR 50.59	3
3.4.3 - LA4	N/A	Not used.	N/A	N/A	N/A
3.4.4, RCS OPERATIONAL LEAKAGE					
3.4.4 - LA1	4.6.D.1	The details of the methods for performing this surveillance by utilizing the Primary Containment Sump Monitoring System (equipment drain sump monitoring and floor drain sump monitoring).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION					
3.4.5 - LA1	Table 3.2-6, Table 4.2-5	The details that the "floor drain sump flow integrator" must be Operable and the details that the "floor drain sump flow integrator" must be functionally checked and calibrated.	Bases	Bases Control Program	1
3.4.5 - LA2	Table 3.2-6 Note 1	The details that the two flow integrators, one for the equipment drain sump and the other for the floor drain sump, comprise the Basic Instrument System that monitors leakage detection inside the drywell.	UFSAR	10 CFR 50.59	1
3.4.6, RCS SPECIFIC ACTIVITY					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.9, RCS P/T LIMITS					
3.4.9 - LA1	4.6.A.2, 4.6.A.3, 4.6.A.4	The requirement that specifies the criteria for ending the P/T limit surveillances during inservice hydrostatic and leak tests, non-nuclear heatup and cooldown, and core critical operations (performed until two consecutive temperature readings are within 5°F of each other).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.4.9 - LA2	3.6.A.5.a	The details in CTS 3.6.A.5.a on how to determine the RCS is acceptable for continued operations (perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS).	Bases	Bases Control Program	3
3.4.9 - LA3	4.6.A.6	The method to evaluate the temperature differential using the temperature at the reactor vessel bottom head "drain line."	Bases	Bases Control Program	3
3.4.9 - LA4	N/A	Not used.	N/A	N/A	N/A
3.4.9 - LA5	3.6.A.2, 3.6.A.3, 3.6.A.4	The specific requirements that operation be on or to the right of the curves of Figure 3.6-1 Part 1 or 2.	Bases	Bases Control Program	1
CTS 3/4.6.F, STRUCTURAL INTEGRITY					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.5 ECCS AND RCIC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.5.1, ECCS - OPERATING					
3.5.1 - LA1	4.5.D.1.b	The surveillance requirement to demonstrate that a simulated automatic ADS actuation is inhibited by the override switches.	TRM	10 CFR 50.59	3
3.5.1 - LA2	4.5.D.1.a	The details that the simulated automatic actuation test for the Automatic Depressurization System (ADS) opens the solenoids.	Bases	Bases Control Program	3
3.5.1 - LA3	4.6.E.4	The methods for verifying the safety/relief valves have opened (i.e., while bypassing steam to the condenser, etc) and the detail that the test must be performed in Run.	Bases	Bases Control Program	3
3.5.1 - LA4	3.5.A.3.b	The detailed descriptions of the requirements for assuring that the LPCI cross-tie line is isolated.	Bases	Bases Control Program	3
3.5.1 - LA5	4.6.E.3	The requirement to verify the integrity of the nitrogen system and components that provide manual and ADS actuation of the safety/relief valves every 3 months.	TRM	10 CFR 50.59	3
3.5.1 - LA6	4.5.G.1, 4.5.G.2, 4.5.G.3	The method to be employed to assure that the Core Spray, Low Pressure Coolant Injection, and High Pressure Coolant Injection pump discharge lines are full of water (i.e., the discharge piping shall be vented from the high point of the system and water flow observed).	Bases	Bases Control Program	3
3.5.1 - LA7	4.5.A.1.d, 4.5.A.1.g, 4.5.A.3, 4.5.C.1	The requirements to perform motor operator valve and testable check valve testing in accordance with the Frequency of the Inservice Testing (IST) Program for the CS System, LPCI System, and HPCI System.	IST Program	10 CFR 50.59	3
3.5.1 - LA8	4.9.F.1, 4.9.F.6	The requirement to perform a weekly visual inspection of the LPCI MOV Independent Power Supply inverters.	TRM	10 CFR 50.59	3
3.5.1 - LA9	N/A	Not used.	N/A	N/A	N/A
3.5.1 - LB1	4.5.G.4	The monthly functional test of the Core Spray and RHR level switches located on the discharge piping high points.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.5 ECCS AND RCIC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.5.1 - LB2	4.5.A.1.e	The Core Spray header Delta P Instrumentation daily check, quarterly calibration, and quarterly functional test.	TRM	10 CFR 50.59	3
3.5.2, ECCS - SHUTDOWN					
3.5.2 - LA1	4.5.F.2	The requirements to perform motor operator valve testing in accordance with the Frequency of the Inservice Testing (IST) Program for the required CS and/or LPCI subsystems.	IST Program	10 CFR 50.59	3
3.5.2 - LA2	4.5.G.1, 4.5.G.2	The method to be employed to assure that the Core Spray and Low Pressure Coolant Injection pump discharge lines are full of water (i.e., the discharge piping shall be vented from the high point of the system and water flow observed).	Bases	Bases Control Program	3
3.5.2 - LB1	4.5.G.4	The monthly functional test of the Core Spray and RHR level switches located on the discharge piping high points.	TRM	10 CFR 50.59	3
3.5.3, RCIC SYSTEM					
3.5.3 - LA1	4.5.E.1.a	The detail that the simulated automatic actuation test includes the automatic restart on a low water level signal that is subsequent to a high water level signal.	Bases	Bases Control Program	3
3.5.3 - LA2	4.5.G.3	The method to be employed to assure that the RCIC pump discharge line is full of water (i.e., the discharge piping shall be vented from the high point of the system and water flow observed).	Bases	Bases Control Program	3
3.5.3 - LA3	N/A	Not used.	N/A	N/A	N/A
3.5.3 - LA4	4.5.E.1.a, 4.5.E.1.c	The requirements to perform RCIC System testable check valve testing and RCIC System motor operated valve testing every 92 days.	IST Program	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.5 ECCS AND RCIC SYSTEM

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.1, PRIMARY CONTAINMENT					
3.6.1.1 - LA1	1.0.M	The details concerning the manual isolation valves, automatic isolation valves, that the drywell and pressure suppression chamber are intact, and the requirement that manways are closed for primary containment Operability.	Bases	Bases Control Program	1
3.6.1.1 - LA2	N/A	Not used.	N/A	N/A	N/A
3.6.1.1 - LA3	3.7.A.5.e	The details that the drywell to suppression chamber leakage rate limit of ≤ 71 scfm shall be monitored via the suppression chamber 10 minute pressure transient of 0.25 in. water/min.	Bases	Bases Control Program	3
3.6.1.1 - LA4	4.7.A.3	The requirement that when the primary containment is inerted, it shall be continuously monitored for gross leakage by review of the inerting system makeup requirements.	UFSAR	10 CFR 50.59	3
3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS					
3.6.1.2 - LA1	1.0.M.2	The detail that at least one door in each airlock is closed and sealed.	Bases	Bases Control Program	1
3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES					
3.6.1.3 - LA1	4.7.A.2.c	The leakage limits and test pressure for the LPCI/CS air-operated testable check valves (as modified by DOC M6).	Bases	Bases Control Program	3
3.6.1.3 - LA2	N/A	Not used.	N/A	N/A	N/A
3.6.1.3 - LA3	N/A	Not used.	N/A	N/A	N/A
3.6.1.3 - LA4	N/A	Not used.	N/A	N/A	N/A
3.6.1.3 - LA5	1.0.M.3	The details concerning automatic containment isolation valves (a deactivated valve in the isolated position ensures containment integrity).	Bases	Bases Control Program	1

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.3 - LA6	3.7.D.1	The design detail that provide the containment vent and purge valve numbers and maximum opening angle limitations.	UFSAR	10 CFR 50.59	1
3.6.1.4, DRYWELL PRESSURE					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.5, DRYWELL AIR TEMPERATURE					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS					
3.6.1.7 - LA1	4.7.A.5.c, 4.7.A.5.g	The requirements that each vacuum breaker valve be inspected to ensure proper maintenance and operation in accordance with the IST Program and that each vacuum breaker valve be inspected and verified to meet design requirements.	IST Program	10 CFR 50.59	3
3.6.1.7 - LA2	3.7.A.5.b	The requirement that one vacuum breaker may be non-fully closed so long as it is determined to be not more than 1 degree open as indicated by the position lights.	Bases	Bases Control Program	3
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.9, RHR CONTAINMENT SPRAY					
3.6.1.9 - LA1	3.5.B.1	The details concerning the number of pumps required in each RHR containment spray subsystem (i.e., two pumps, but changed by DOC L4 to one pump).	Bases	Bases Control Program	1
3.6.1.9 - LA2	4.5.B.1.b	The inservice testing requirement for the RHR containment cooling mode motor operated valves.	IST Program	10 CFR 50.59	3
3.6.1.9 - LA3	4.5.B.1.f	The details on the method to determine the spray headers are unobstructed (i.e., an air test).	Bases	Bases Control Program	3
3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.2.2, SUPPRESSION POOL WATER LEVEL					
3.6.2.2 - LA1	3.7.A.1.b	The details of Operability testing that result in the suppression pool water level not being within limits.	Bases	Bases Control Program	3
3.6.2.3, RHR SUPPRESSION POOL COOLING					
3.6.2.3 - LA1	3.5.B.1	The details concerning the number of pumps required in each RHR containment spray subsystem (i.e., two pumps, but changed by DOC L2 to one pump).	Bases	Bases Control Program	1
3.6.2.3 - LA2	4.5.B.1.b	The inservice testing requirement for the RHR containment cooling mode motor operated valves.	IST Program	10 CFR 50.59	3
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE					

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.2.4 - LA1	3.7.A.7.a.(2)	The details of Operability testing that result in the drywell-to-suppression chamber pressure not being within limits.	Bases	Bases Control Program	3
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.3.2, CAD SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.1, SECONDARY CONTAINMENT					
3.6.4.1 - LA1	3.7.C.1.d	The requirement that secondary containment be maintained if the fuel cask is being moved in the reactor building.	UFSAR	10 CFR 50.59	3
3.6.4.1 - LA2	4.7.C.1.c	The details concerning the required wind conditions during the secondary containment 1 hour vacuum test.	Bases	Bases Control Program	1
3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES					
3.6.4.2 - LA1	3.7.C.1.d	The requirement that secondary containment shall be maintained (isolation valves Operable) if the fuel cask is being moved in the reactor building.	UFSAR	10 CFR 50.59	3
3.6.4.3, STANDBY GAS TREATMENT SYSTEM					
3.6.4.3 - LA1	3.7.C.1.d	The requirement that secondary containment shall be maintained (SGT System Operable) if the fuel cask is being moved in the reactor building.	UFSAR	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.4.3 - LB1	4.7.B.1.f	The requirement to calibrate the SGT System differential pressure switches every 24 months.	TRM	10 CFR 50.59	3
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.1, RHRSW SYSTEM					
3.7.1 - LA1	3.5.B.1	The details concerning the number of pumps required in each RHR service water subsystem.	Bases	Bases Control Program	1
3.7.1 - LA2	4.5.B.1.c, 4.5.B.1.d	The inservice testing requirements for the RHRSW pumps and valves, including the pump flow rate.	IST Program	10 CFR 50.59	3
3.7.2, ESW SYSTEM and UHS					
3.7.2 - LA1	4.11.D.1.b, 4.11.D.1.d	The inservice testing requirements for the ESW pumps and valves, including the pump flow rate and total developed head.	IST Program	10 CFR 50.59	3
3.7.2 - LA2	4.11.D.2	The detail on how to perform ESW surveillances (i.e., that ESW will not be supplied to RBCLC System during testing).	Bases	Bases Control Program	2
3.7.2 - LA3	3.11.E	The detail that a minimum of 18 heaters out of 88 are required (as modified by DOC M3).	Bases	Bases Control Program	3
3.7.3, CREVAS SYSTEM					
3.7.3 - LA1	3.11.A.1	The details concerning the components of the Main Control Room Emergency Ventilation Subsystem (emergency ventilation air supply fans and fresh air filter trains) required to be OPERABLE.	Bases	Bases Control Program	3
3.7.3 - LB1	4.11.A.4	The requirement to calibrate the temperature transmitters and differential pressure switches every 24 months.	TRM	10 CFR 50.59	3
3.7.4, CONTROL ROOM AC SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS					
3.7.5 - LA1	RETS 3.5.a (SR section)	The details of the method of performing the Surveillance to verify the gross gamma activity rate is within limit (by performing an isotopic analysis on a representative sample of gases and the description of the acceptable sample point).	Bases	Bases Control Program	3
3.7.6, MAIN TURBINE BYPASS SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE
3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL					
3.7.7 - LA1	3.10.C	The requirement that whenever irradiated fuel is stored in the spent fuel storage pool, the pool water level shall be maintained at a minimum water level of 33 ft.	UFSAR	10 CFR 50.59	3
CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES					
NONE	NONE	NONE	NONE	NONE	NONE
CTS 3/4.11.C, BATTERY ROOM VENTILATION					
NONE - LA1	3/4.11.C	The Battery Room Ventilation Specification.	TRM	10 CFR 50.59	3

CHANGE TYPE
1. Details of system design and system description including design limits

2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.1, AC SOURCES - OPERATING					
3.8.1 - LA1	3.9.A.1, 3.9.A.1.a	The details of Operability "that power is available to the emergency buses from the following power sources," and the specific design details referring to the "115 kV lines and reserve station transformers."	Bases	Bases Control Program	1, 3
3.8.1 - LA2	4.9.B.3	The requirement to check the EDG instrumentation during monthly generator testing.	TRM	10 CFR 50.59	3
3.8.2, AC SOURCES - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR					
3.8.3 - LA1	4.9.C	The requirement that the quantity of diesel fuel available in each storage tank be manually measured once per month and compared to the reading of the local indicators to ensure proper operation thereof.	TRM	10 CFR 50.59	3
3.8.3 - LA2	4.9.C.1	The fuel oil property limits.	TRM	10 CFR 50.59	3
3.8.4, DC SOURCES - OPERATING					
3.8.4 - LA1	3.9.E.1, 3.9.F.1	The details relating to the components of the DC sources (both batteries and the associated chargers).	Bases	Bases Control Program	1
3.8.4 - LA2	4.9.E.5.a, 4.9.E.5.b, 4.9.F.5.a, 4.9.F.5.b	The details concerning battery degradation (i.e., if the capacity drops more than 10% from its previous performance test (or modified performance test) and if capacity is below 90% of manufacturer's rating), consistent with IEEE-450.	Bases	Bases Control Program	2

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.8.4 - LA3	4.9.E.6, 4.9.F.1, 4.9.F.6	The details relating to the battery charger weekly visual inspection.	TRM	10 CFR 50.59	3
3.8.4 - LA4	4.9.F.6	The requirement to perform a test of the LPCI MOV independent power supply battery charger every 24 months.	TRM	10 CFR 50.59	3
3.8.5, DC SOURCES - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.8.6, BATTERY CELL PARAMETERS					
3.8.6 - LA1	4.9.E.2.c, 4.9.F.2.c	The detail to measure the temperature of "every fifth cell" (as modified by DOC L3).	Bases	Bases Control Program	3
3.8.7, DISTRIBUTION SYSTEMS - OPERATING					
3.8.7 - LA1	3.9.A.2, 3.9.F.1	The details related to the specific buses required to be Operable and the details of what "Operable" means (e.g., energized, in service).	Bases	Bases Control Program	1
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.1, REFUELING EQUIPMENT INTERLOCKS					
3.9.1 - LA1	3.10.A.3, 3.10.A.4	The actual hoist loaded setpoints.	TRM	10 CFR 50.59	1
3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.3, CONTROL ROD POSITION					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.4, CONTROL ROD POSITION INDICATION					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.5, CONTROL ROD OPERABILITY - REFUELING					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.6, REACTOR PRESSURE VESSEL WATER LEVEL					
NONE	NONE	NONE	NONE	NONE	NONE
3.9.7, RESIDUAL HEAT REMOVAL - HIGH WATER LEVEL					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION					
3.10.1 - LA1	3.12.A	The temperature allowance of up to 300°F to perform the inservice leak or hydrostatic test.	TRM	10 CFR 50.59	3
3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING					
3.10.6 - LA1	3.10.A.7.b	The details related to how to perform the spiral on-load sequence.	Bases	Bases Control Program	2, 3
3.10.6 - LA2	4.10.A.2	The details of the method used to verify that all fuel is removed before the corresponding control rod is withdrawn (by one licensed operator and one member of the reactor analyst department).	Bases	Bases Control Program	3

TABLE LA - REMOVAL OF DETAILS MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.7, CONTROL ROD TESTING - OPERATING					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.8, SHUTDOWN MARGIN TEST - REFUELING					
NONE	NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
4.0 - LA1	5.1.1, 5.1.2, 5.3, 5.4, 5.6, RETS 1.0.L, RETS Figure 5.1-1	Details of the site features (details of the site location, description, and various structures of the plant), the reactor pressure vessel, the primary and secondary containment, and the seismic design of the reactor building and all engineered safeguards.	UFSAR	10 CFR 50.59	3

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.1, RESPONSIBILITY					
NONE	NONE	NONE	NONE	NONE	NONE
5.2, ORGANIZATION					
5.2 - LA1	Table 6.2-1 note **	The detail that requires both licensed ROs on shift be in the control room during plant startup or planned shutdown.	UFSAR	10 CFR 50.59	3
5.2 - LA2	6.2.2.6	The details of limiting the working hours of the plant staff and administrative controls on the use of overtime.	Plant Procedures	FitzPatrick procedure control process	3
5.2 - LA3	6.3.2 Note 1	The detail that the 13 individuals who hold SRO licenses and have completed the FitzPatrick Advanced Technical Training Program prior to issuance of License Amendment 111 shall be considered qualified as dual-role SRO/STAs.	UFSAR	10 CFR 50.59	3
5.2 - LA4	Table 6.2-1	The details of the minimum shift crew requirements for the SRO and RO.	UFSAR	10 CFR 50.59	3
5.2 - LA5	RETS 7.1.b	The detail that specifies it is the responsibility of the General Manager-Operations to implement the Radiological Effluent Technical Specifications (RETS).	UFSAR	10 CFR 50.59	3
5.3, PLANT STAFF QUALIFICATIONS					
NONE	NONE	NONE	NONE	NONE	NONE
5.4, PROCEDURES					
5.4 - LA1	6.8.(A).1, 6.8.(B), 6.8.(C), RETS 7.2	Details that establish specific requirements for development, review and approval, and changes of procedures, including temporary changes.	QA Program	10 CFR 50.54(a)	3

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.5, PROGRAMS AND MANUALS					
5.5 - LA1	Facility Operating License 2.C(5)	The "Iodine Monitoring Program."	UFSAR	10 CFR 50.59	3
5.5 - LA2	Table 6.10-1	The list of component cyclic or transient limits, by transient condition and number of design occurrences.	UFSAR	10 CFR 50.59	3
5.5 - LA3	RETS 2.5, RETS 2.7	The details that provide limiting conditions for operation and surveillance requirements for explosive gas and storage tank radioactivity in radwaste systems.	TRM	10 CFR 50.59	3
5.5 - LA4	4.7.B.1.c(1), 4.7.B.1.c(2), 4.11.A.2(1), 4.11.A.2(2)	The schedular details ("Within 31 days after removal") for performing the laboratory tests of the filter trains.	TRM	10 CFR 50.59	3
5.6, REPORTING REQUIREMENTS					
5.6 - LA1	6.9.A.1	The Startup Report requirements.	UFSAR	10 CFR 50.59	3
5.6 - LA2	RETS 7.3.c, RETS 7.3.d	The details associated with the contents of the Radioactive Effluent Release Report and the Annual Radiological Environmental Operating Report.	ODCM	ODCM Change Control Process in ITS Chapter 5	3
5.7, HIGH RADIATION AREA					

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
5.7 - LA1	6.11	The details concerning the requirements of the Radiation Protection Program.	UFSAR	10 CFR 50.59	3
CTS 6.0, ADMINISTRATIVE CONTROLS					
None - LA1	6.4	Details that provide requirements for retraining and replacement training for the plant staff.	UFSAR	10 CFR 50.59	3
None - LA2	6.5	Details that set forth requirements for review and approval of programs and procedures, and the review and audit responsibilities of the Plant Operating Review Committee and Safety Review Committee.	QA Program	10 CFR 50.54(a)	3
None - LA3	6.6(B)	Details that set forth requirements for review and approval of reportable events.	UFSAR	10 CFR 50.59	3
None - LA4	6.10	Details that require that certain records be retained.	QA Program	10 CFR 50.54(a)	3
None - LA5	6.16	The details that provide programmatic requirements for the processing of solid radioactive waste and the Process Control Program (PCP).	UFSAR	10 CFR 50.59	3
None - LA6	6.18	Details associated with the reporting requirements of the major modifications to liquid, gaseous, and solid radwaste treatment systems.	ODCM	ODCM Change Control Process in ITS Chapter 5	3
None - LA7	6.17.C.2	Details that set forth Plant Operating Review Committee review and acceptance of changes to the Offsite Dose Calculation Manual.	QA Program	10 CFR 50.54(a)	3
RETS 2.1, LIQUID EFFLUENT MONITORS					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 2.2, CONCENTRATION OF LIQUID EFFLUENTS					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
RETS 2.3, DOSE FROM LIQUID EFFLUENTS					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.1, GASEOUS EFFLUENT MONITORS					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.2, GASEOUS DOSE RATES					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.3, AIR DOSE, NOBLE GASES					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM					
NONE	NONE	NONE	NONE	NONE	NONE
RETS 3.6, OFFGAS TREATMENT SYSTEM					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

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

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation

3. Procedural details for meeting TS requirement, relocated reporting requirements, and relocated specification requirements

ATTACHMENT 6

Table R - Relocated Specifications Matrix

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.1.1, SHUTDOWN MARGIN				
NONE	NONE	NONE	NONE	NONE
3.1.2, REACTIVITY ANOMALIES				
NONE	NONE	NONE	NONE	NONE
3.1.3, CONTROL ROD OPERABILITY				
NONE	NONE	NONE	NONE	NONE
3.1.4, CONTROL ROD SCRAM TIMES				
NONE	NONE	NONE	NONE	NONE
3.1.5, CONTROL ROD SCRAM ACCUMULATORS				
NONE	NONE	NONE	NONE	NONE
3.1.6, ROD PATTERN CONTROL				
NONE	NONE	NONE	NONE	NONE
3.1.7, STANDBY LIQUID CONTROL SYSTEM				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.1.8, SCRAM DISCHARGE VOLUME VENT AND DRAIN VALVES				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO				
NONE	NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.4, APRM GAIN AND SETPOINT				
3.2.4 - R1	4.1.B	The requirements concerning the APRM Rod Block Setpoints.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.1.1, RPS INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.1.2, SRM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.2.1, CONTROL ROD BLOCK INSTRUMENTATION				
3.3.2.1 - R1	2.1.A.1.d, Table 3.2-3 including Notes 1.a, 1.c, 1.d, 2 (Action A and Action C portions), 4, 5, 6, 8, and 10, Table 4.2-3 including Notes 2, 3, and 6	The APRM, IRM, SRM, and Scram Discharge Volume Level Control Rod Blocks.	TRM	10 CFR 50.59
3.3.2.2, FEEDWATER AND MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.3.1, PAM INSTRUMENTATION				
3.3.3.1 - R1	Tables 3.2-8 and 4.2-8 Instruments 1, 2, 3, 19, 20, and 21, Table 3.2-8 Notes B, C, D, E, and G	The Stack High Range Effluent Monitor, Turbine Building Vent High Range Effluent Monitor, Radwaste Building Vent High Range Effluent Monitor, Safety/Relief Valve Position Indicator, Torus Water Level (narrow range) instrument, and Drywell-Torus Differential Pressure instrument.	TRM	10 CFR 50.59
3.3.3.1 - R2	Tables 3.2-8 and 4.2-8 Instruments 15, 16, 17, 18, Table 3.2-8 Notes A and J	The Residual Heat Removal System Flow, Residual Heat Removal Service Water System Flow, Core Spray System Flow, and Core Spray System Pressure instruments.	TRM	10 CFR 50.59
3.3.3.2, REMOTE SHUTDOWN SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.3.4.1, ATWS-RPT INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.5.1, ECCS INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.5.2, RCIC SYSTEM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.6.1, PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.6.2, SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.7.1, CREVAS SYSTEM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.7.2, CONDENSER AIR REMOVAL PUMP ISOLATION INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.7.3, ESW SYSTEM INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.3.8.1, LOP INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.3.8.2, RPS ELECTRIC POWER MONITORING				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.4.1, RECIRCULATION LOOPS OPERATING				
NONE	NONE	NONE	NONE	NONE
3.4.2, JET PUMPS				
NONE	NONE	NONE	NONE	NONE
3.4.3, SAFETY/RELIEF VALVES				
NONE	NONE	NONE	NONE	NONE
3.4.4, RCS OPERATIONAL LEAKAGE				
NONE	NONE	NONE	NONE	NONE
3.4.5, RCS LEAKAGE DETECTION INSTRUMENTATION				
NONE	NONE	NONE	NONE	NONE
3.4.6, RCS SPECIFIC ACTIVITY				
NONE	NONE	NONE	NONE	NONE
3.4.7, RHR SHUTDOWN COOLING SYSTEM - HOT SHUTDOWN				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.4.8, RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.4.9, RCS P/T LIMITS				
NONE	NONE	NONE	NONE	NONE
CTS 3/4.6.F, STRUCTURAL INTEGRITY				
None - R1	3/4.6.F	The structural integrity inspection requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND RCIC SYSTEM

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.5.1, ECCS - OPERATING				
NONE	NONE	NONE	NONE	NONE
3.5.2, ECCS - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.5.3, RCIC SYSTEM				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.1.1, PRIMARY CONTAINMENT				
NONE	NONE	NONE	NONE	NONE
3.6.1.2, PRIMARY CONTAINMENT AIR LOCKS				
NONE	NONE	NONE	NONE	NONE
3.6.1.3, PRIMARY CONTAINMENT ISOLATION VALVES				
NONE	NONE	NONE	NONE	NONE
3.6.1.4, DRYWELL PRESSURE				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, DRYWELL AIR TEMPERATURE				
NONE	NONE	NONE	NONE	NONE
3.6.1.6, REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS				
NONE	NONE	NONE	NONE	NONE
3.6.1.7, SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS				
NONE	NONE	NONE	NONE	NONE

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.1.8, MAIN STEAM LEAKAGE COLLECTION SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.6.1.9, RHR CONTAINMENT SPRAY				
NONE	NONE	NONE	NONE	NONE
3.6.2.1, SUPPRESSION POOL AVERAGE TEMPERATURE				
NONE	NONE	NONE	NONE	NONE
3.6.2.2, SUPPRESSION POOL WATER LEVEL				
NONE	NONE	NONE	NONE	NONE
3.6.2.3, RHR SUPPRESSION POOL COOLING				
NONE	NONE	NONE	NONE	NONE
3.6.2.4, DRYWELL-TO-SUPPRESSION CHAMBER DIFFERENTIAL PRESSURE				
NONE	NONE	NONE	NONE	NONE
3.6.3.1, PRIMARY CONTAINMENT OXYGEN CONCENTRATION				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.3.2, CAD SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, SECONDARY CONTAINMENT				
NONE	NONE	NONE	NONE	NONE
3.6.4.2, SECONDARY CONTAINMENT ISOLATION VALVES				
NONE	NONE	NONE	NONE	NONE
3.6.4.3, STANDBY GAS TREATMENT SYSTEM				
NONE	NONE	NONE	NONE	NONE
CTS 3.7.A.3, CONTAINMENT PURGE THROUGH THE STANDBY GAS TREATMENT SYSTEM				
None - R1	3.7.A.3, 3.7.A.8	The requirement to discontinue purging if not purging through the SGT System whenever primary containment integrity is required, and the associated shutdown action.	ODCM	ODCM Change Control Process in ITS Chapter 5

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.7.1, RHRSW SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.7.2, ESW SYSTEM and UHS				
NONE	NONE	NONE	NONE	NONE
3.7.3, CREVAS SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.7.4, CONTROL ROOM AC SYSTEM				
NONE	NONE	NONE	NONE	NONE
3.7.5, MAIN CONDENSER STEAM JET AIR EJECTOR OFFGAS				
3.7.5 - R1	RETS 3.5.b, RETS Tables 3.10-1 and 3.10-2	Steam Jet Air Ejector System radiation monitors.	ODCM	ODCM Change Control Process in ITS Chapter 5
3.7.6, MAIN TURBINE BYPASS SYSTEM				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.7.7, SPENT FUEL STORAGE POOL WATER LEVEL				
NONE	NONE	NONE	NONE	NONE
CTS 3/4.8, MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES				
NONE - R1	3/4.8	The Miscellaneous Radioactivity Materials Sources Specification.	TRM	10 CFR 50.59
CTS 3/4.11.C, BATTERY ROOM VENTILATION				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.8.1, AC SOURCES - OPERATING				
NONE	NONE	NONE	NONE	NONE
3.8.2, AC SOURCES - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.8.3, DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR				
NONE	NONE	NONE	NONE	NONE
3.8.4, DC SOURCES - OPERATING				
NONE	NONE	NONE	NONE	NONE
3.8.5, DC SOURCES - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.8.6, BATTERY CELL PARAMETERS				
NONE	NONE	NONE	NONE	NONE
3.8.7, DISTRIBUTION SYSTEMS - OPERATING				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.8.8, DISTRIBUTION SYSTEMS - SHUTDOWN				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.9.1, REFUELING EQUIPMENT INTERLOCKS				
NONE	NONE	NONE	NONE	NONE
3.9.2, REFUEL POSITION ONE-ROD-OUT INTERLOCK				
NONE	NONE	NONE	NONE	NONE
3.9.3, CONTROL ROD POSITION				
NONE	NONE	NONE	NONE	NONE
3.9.4, CONTROL ROD POSITION INDICATION				
NONE	NONE	NONE	NONE	NONE
3.9.5, CONTROL ROD OPERABILITY - REFUELING				
NONE	NONE	NONE	NONE	NONE
3.9.6, REACTOR PRESSURE VESSEL WATER LEVEL				
NONE	NONE	NONE	NONE	NONE
3.9.7, RESIDUAL HEAT REMOVAL - HIGH WATER LEVEL				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.9.8, RESIDUAL HEAT REMOVAL - LOW WATER LEVEL				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.10.1, INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION				
NONE	NONE	NONE	NONE	NONE
3.10.2, REACTOR MODE SWITCH INTERLOCK TESTING				
NONE	NONE	NONE	NONE	NONE
3.10.3, SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.10.4, SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN				
NONE	NONE	NONE	NONE	NONE
3.10.5, SINGLE CONTROL ROD DRIVE REMOVAL - REFUELING				
NONE	NONE	NONE	NONE	NONE
3.10.6, MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING				
NONE	NONE	NONE	NONE	NONE
3.10.7, CONTROL ROD TESTING - OPERATING				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.10.8, SHUTDOWN MARGIN TEST - REFUELING				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
5.1, RESPONSIBILITY				
NONE	NONE	NONE	NONE	NONE
5.2, ORGANIZATION				
NONE	NONE	NONE	NONE	NONE
5.3, PLANT STAFF QUALIFICATIONS				
NONE	NONE	NONE	NONE	NONE
5.4, PROCEDURES				
NONE	NONE	NONE	NONE	NONE
5.5, PROGRAMS AND MANUALS				
NONE	NONE	NONE	NONE	NONE
5.6, REPORTING REQUIREMENTS				
NONE	NONE	NONE	NONE	NONE
5.7, HIGH RADIATION AREA				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
CTS 6.0, ADMINISTRATIVE CONTROLS				
NONE	NONE	NONE	NONE	NONE
RETS 2.1, LIQUID EFFLUENT MONITORS				
None - R1	RETS 2.1, RETS Table 3.10-2	The liquid effluent monitors requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 2.2, CONCENTRATION OF LIQUID EFFLUENTS				
None - R1	RETS 2.2	Limitation on the concentration of radioactive materials in liquid effluents.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 2.3, DOSE FROM LIQUID EFFLUENTS				
None - R1	RETS 2.3	Dose limitations from liquid effluents to the members of the public.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 2.4, LIQUID RADIOACTIVE WASTE TREATMENT SYSTEM OPERATIONS				
None - R1	RETS 2.4	Liquid Radwaste Treatment System Operability requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
RETS 3.1, GASEOUS EFFLUENT MONITORS				
None - R1	3.1, RETS Table 3.10-2	The gaseous effluent monitors requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 3.2, GASEOUS DOSE RATES				
None - R1	RETS 3.2	Limitations on the dose rate due to gaseous effluents.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 3.3, AIR DOSE, NOBLE GASES				
None - R1	RETS 3.3	Limitations on noble gas releases.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 3.4, DOSE DUE TO IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM				
None - R1	RETS 3.4	Limitations on the dose from iodine-131, iodine 133, tritium, and all radioactive material in particulate form with half lives greater than 8 days.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 3.6, OFFGAS TREATMENT SYSTEM				
None - R1	RETS 3.6	Limitations on the Offgas Treatment System.	ODCM	ODCM Change Control Process in ITS Chapter 5

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
RETS 4.0, SOLID RADIOACTIVE WASTE - PROCESS CONTROL PROGRAM				
None - R1	RETS 4.0	Requirements that the Solid Radwaste System shall be used in accordance with the PCP to process wet radioactive wastes.	PCP	10 CFR 50.59
RETS 5.0, TOTAL DOSE - TOTAL DOSE FROM URANIUM FUEL CYCLE				
None - R1	RETS 5.0	Limitations of the annual doses from all plant sources.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.1, MONITORING PROGRAM				
None - R1	RETS 6.1	The radiological environmental monitoring program requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.2, LAND USE CENSUS PROGRAM				
None - R1	RETS 6.2	The land use census program requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5
RETS 6.3, INTERLABORATORY COMPARISON PROGRAM				
None - R1	RETS 6.3	The interlaboratory comparison program requirements.	ODCM	ODCM Change Control Process in ITS Chapter 5

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTIO N	SUMMARY	LOCATION	CHANGE CONTROL PROCESS