

**Table L – Less Restrictive Changes
ITS Section 1.0 – Use and Application**
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 2.0 – Safety Limits
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.0 – LCO Applicability/SR Applicability
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.0-20	Relaxes CTS requirements allowing up to 24 hours for a missed SR. ITS allows 24 hours up to the stated interval with appropriate risk assessment justification.	LCO 3.0.3	LCO 4.0.B	3, 9

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.1-21	Eliminates CTS requirement to enter LCO 3.0.C which requires entering MODE 3 in 6 hours and MODE 5 in 36 hours. The ITS only requires the plant to go to MODE 3 in 6 hours and not continue to MODE 5 for the same Condition.	LCO 3.1.5	LCO 3.0.C, 3.0.C, and 3.10.D.1	4, 8
L3.1-23	Eliminates CTS requirements to comply with the control bank insertion limits when "approaching criticality". The ITS only requires meeting control bank insertion limits when in MODES 1 and 2 with Keff ≥ 1.0.	LCO 3.1.6	LCO 3.10.D.2	2
L3.1-26	Eliminates CTS requirements to enter LCO 3.0.C which requires entering MODE 3 in 6 hours and MODE 5 in 36 hours. The ITS only requires the plant to go to MODE 3 in 6 hours and not continue to MODE 5 for the same Condition.	LCO 3.1.6	LCO 3.0.C and 3.10.D	4, 8
L3.1-28	Eliminates CTS requirements for ITC, Rod Group Alignment, and RCS Minimum Temperature for Criticality requirements from being met during PHYSICS TESTS.	LCO 3.1.8, LCO 3.1.5 Note, and LCO 3.1.6 Note	LCO 3.10.D.3	2, 4
L3.1-63	Eliminates CTS OPERABILITY requirements for the Analog Rod Position Indication System in MODES 3, 4, and 5 when the reactor trip system breakers are closed and the control rod drive system is capable of rod withdrawal.	NA	Table 4.1-1C Function 2 Note 31	1, 2

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.1-64	Relaxes CTS requirements to functionally test the rod position indication "prior to each startup following shutdown in excess of two days if not done in the previous 30 days". The ITS requires this test to be performed "prior to criticality after each removal of the reactor head".	SR 3.1.7.1	Table 4.1-1C Note 30	3
L3.1-67	Increases CTS Completion Time for determining core power distribution from 2 hours to 8 hours.	LCO 3.1.4	LCO 3.10.E.1	5

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.2 –Power Distribution Limits**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.2-09	Deletes CTS requirements to determine the target flux difference and $F_{\Delta H}$ following power changes of 10% or more.	SR 3.2.1.1	LCO 3.10.B.2.b	3
L3.2-17	Reduces CTS operating restrictions for placing the unit in MODE 3 when the hot channel factors are not met. The ITS requires placing the unit in MODE 2 in the same Condition.	LCO 3.2.2, Condition B	LCO 3.10.B.1	2, 4
L3.2-18	Deletes CTS requirements for placing the plant in hot shutdown within 24 hours if the hot channel limits are not met. The ITS requires a specific reduction in power level and not a shutdown.	LCO 3.2.2, Condition A	LCO 3.10.B.3.c	2, 4
L3.2-24	Deletes CTS requirement that "at least three operable excor channels" shall be within the target band for AFD. The ITS requires that the AFD shall be considered outside the target band when two or more OPERABLE excor channels indicate AFD to be outside the target band.	LCO 3.2.3	LCO 3.10.B.4, 3.10.B.6.c, and 3.10.B.7	1
L3.2-28	Increases CTS Completion Time by an additional 15 minutes to allow for correcting the AFD when operating above 90% RTP.	LCO 3.2.3, Condition C	LCO 3.10.B.5	5
L3.2-32	Eliminates CTS requirements to reduce the high neutron flux setpoint when the AFD deviates from the Target Band for more than 1 hour when violated for two OPERABLE excor channels.	LCO 3.2.3	LCO 3.10.B.6.b	4

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.2 –Power Distribution Limits**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.2-44	Eliminates CTS Action Statements addressing remedial actions, including reduction in RTP and potential reactor shutdown, when QPTR limits are not met. The ITS only requires RTP reduction and not a reactor shutdown.	NA	LCO 3.10.C.2 and 3.10.C.3	4
L3.2-50	Relaxes CTS requirements for maintaining the hot channel factor within limits at all times, except for low power Physics Testing. The ITS only requires the hot channel factor limits to be met in MODE 1.	LCO 3.2.1	LCO 3.10.B.1	2

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect.	Change Type
		Table 3.3.3-2 FU 1d, and 4c	2.3.B.4, Table 3.5-1, FU 3 and 5	
L3.3-33	Relaxes CTS Completion Time by one hour to restore an inoperable breaker to OPERABLE prior to initiating a plant shutdown.	LCO 3.3.1 Cond P	LCO 3.0.C and Table 3.5-2A Action 9 Part b and Action 10	5
L3.3-36	Eliminates CTS requirement for the automatic initiation of SI on a high containment pressure in Mode 4.	Table 3.3.2-1	Table 3.5-2B, FU 1e and Table 4.1-1B Function 1b and 2b	4
L3.3-37	Eliminates CTS requirement for the automatic initiation of containment spray on high containment pressure in Mode 4.	Table 3.3.2-1, FU 2c	Table 3.5-2B, FU 2b and Table 4.1-1B Function 2b	4

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-82	Eliminates CTS requirements to calibrate the RCP breaker open function every refueling outage.	NA	Table 4.1-1A Function 16	3
L3.3-83	Relaxes CTS Frequency for testing the RCP breaker open trip instrumentation every 24 months instead of every shutdown in excess of 2 days.	Table 3.3.1-1, FU 11	Table 4.1-1A Function 16	3, 9
L3.3-86	Relaxes CTS Frequency from performing the SR prior to each startup following shutdown in excess of 2 days if not done in the previous 30 days to be performed prior to each startup if not done in the previous 92 days and every 92 days thereafter.	SR 3.3.1.8	Table 4.1-1A Notes 4 and 17	3, 9
L3.3-113	Replaces CTS weekly check of RWST level instrumentation with a monthly check. Also monthly functional test was deleted.	Table 3.3.3-1	Table 4.1-1C Function 8	3, 9
L3.3-117	Eliminates CTS requirement for the OTΔT and OPΔT functions being calibrated or OPERABLE in Mode 3.	NA	Table 4.1-1C Function 18 and Note 34	3

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-125	Relaxes CTS requirements for verification of the core quadrant power balance from daily and during 10% power changes when one excore nuclear channel is inoperable (with power above 85%) to verify core quadrant power balance every 12 hours.	LCO 3.3.1, Condition D	LCO 3.10.C.4	3, 9
L3.3-129	Relaxes CTS requirements which limits the applicability in Mode 2 to above P-6 instead of only Mode 2.	Table 3.3.1-1, FU 4 Note c, and Note k	Table 3.5-2A, FU 5 and Table 4.1-1A Function 5	2, 4
L3.3-132	Eliminates CTS column titles and associated limits for the "Channels to Trip" and "Minimum Channels Operable." This change is based on the new ISTS format.	Table 3.3.1-1 and Table 3.3.2-1	Table 3.5-2A and 3.5-2B	4
L3.3-135	Eliminates CTS requirements to enter LCO 3.0.C for two source range neutron flux channels inoperable. The ITS provides specific Required Actions to avoid an unnecessary reactor shutdown.	LCO 3.3.1 Cond I	Table 3.5-2A, Action 4 and LCO 3.0.C	4, 5, 9
L3.3-136	Relaxes CTS requirements for RTB being opened when one manual trip channel or one source range neutron flux channel is inoperable. The ITS provides specific actions to initiate action to fully insert all rods and place the rod control system in a condition incapable of rod withdrawal.	LCO 3.3.1 Cond C and J	Table 3.5-2A Action 5 and 8	4

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.3 – Instrumentation**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.3-137	Relaxes CTS requirements for a core quadrant power balance to be performed when a power range neutron flux channel is inoperable and RTP is above 85%. The ITS only requires a determination that the core quadrant power balance when the power range neutron flux input to QPRT is inoperable.	LCO 3.3.1 Cond D	Table 3.5-2A Action 2c	4
L3.3-138	Relaxes CTS requirements for a quarterly verification in Modes 3, 4, and 5 that P-6 and P10 are in their required state with a COT on the source range neutron flux instrumentation. The ITS only requires verification that P-6 and P-10 are in their required state for existing plan conditions associated with the COT on power range.	Table 3.3.1-1, FU 5	Table 4.1-1A Function 6b	3, 9
L3.3-168	Relaxes CTS SR requirements for performing a CHANNEL CALIBRATION for the radiation monitors for Containment Purge System from prior to CORE ALTERATIONS to 24 months. This change also revises the Applicability to during movement of irradiated fuel.	LCO 3.3.5	LCO 3.8.A.1.j	3
L3.3-169	Relaxes CTS SR requirements for performance of hydrogen monitors CHANNEL CHECK from shiftily to monthly.	SR 3.3.3.1 and 3.3.3.2	Table 4.1-1C FU 29	3

CHANGE TYPES

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

**Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-02	Relaxes CTS requirements by deleting the limitation for the pressurizer pressure limits during an increase in power. The ITS applies this limit to both increasing and decreasing power.	LCO 3.4.1	LCO 3.10.J	2
L3.4-05	Increases CTS Completion Time from 4 to 6 hours for reducing power to MODE 2.	LCO 3.4.1	LCO 3.10.J	5
L3.4-16	Increases the CTS Completion Time from 6 hours to 12 hours for reducing RCS temperature below 350° F, if an inoperable reactor coolant loop cannot be restored to OPERABLE.	LCO 3.4.5, Conditions A and B	LCO 3.1.A.1.b(2)	5
L3.4-36	Relaxes CTS requirements allowing one RHR loop to be inoperable for surveillance testing while the other RHR loop is OPERABLE and in operation.	LCO 3.4.7 and 3.4.8 Note 2	LCO 3.1.A.1.d	1, 3, 4
L3.4-47	Eliminates CTS requirement for one pressurizer safety valve to be operable when the head is on the reactor vessel.	NA	LCO 3.1.A.2.b (2)	1
L3.4-48	Eliminates CTS requirement for the PSVs to meet the LCO lift setting limits in MODE 3, when the plant is starting up, to allow adjusting the settings under hot conditions.	LCO 3.4.10 Note	LCO 3.1.A.2.b (1)	2, 3, 4

CHANGE TYPES

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

**Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System**
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-86	Increases CTS SR interval from 18 to 24 month interval for PORV functional testing and emergency pressurizer heater power supply.	SR 3.4.11.2	SR 4.6.C and Table 4.1-2A Item 7	7
L3.4-87	Increases CTS requirements for PIV leakage from 1.0 to 0.5 gpm per inch of nominal valve size up to 5 gpm maximum.	SR 3.4.15.1	SR 4.3	3
L3.4-88	Increases CTS SR interval from 5 times per week to once per week for RCS gross activity determination.	SR3.4.17.1	Table 4.1-2B Item 1	3, 9
L3.4-91	Eliminates CTS requirement to sample once per 4 hours when specific activity exceeds 100/E uCi/gram.	LCO 3.4.17	Table 4.1-2B Item 4a	3, 9
L3.4-109	Increases CTS Completion Time for restoring an inoperable Pressurizer Safety Valve to OPERABLE from 12 hours to 24 hours.	LCO 3.4.10	LCO 3.1.A.2.b (1)	5

CHANGE TYPES

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

**Table L – Less Restrictive Change
ITS Section 3.4- Reactor Coolant System**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.4-118	Relaxes CTS actions to de-energize all control rod drive mechanisms in the event that both RCPs are inoperable or not in operation. The ITS does not restrict the plant to only using one method, as the CTS, of placing the control rod drive system in a condition incapable of rod withdrawal.	LCO 3.4.5	LCO 3.1.A.1.b(3)	4
L3.4-126	Relaxes the CTS requirement for both an RCP and its associated SG as an acceptable method of decay heat removal. The ITS only requires the SG as an acceptable method of decay heat removal and does not require its associated RCP.	LCO 3.4.6 and 3.4.7	LCO 3.1.A.1.c (1)	1, 4

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.5-09	Reduces CTS requirements for two trains of ECCS in MODE 4 down to the SI pump disable temperature to be OPERABLE. The ITS only requires one train of ECCS to be OPERABLE in MODE 4 above the SI pump disable temperature.	LCO 3.5.3	NA	1, 2, 4
L3.5-13	Reduces CTS shutdown requirements of MODE 5 within 36 hours to MODE 4 in 12 hours in the event that one or more trains of ECCS are inoperable for longer than 72 hours.	LCO 3.5.2	LCO 3.3.A.2	4, 5
L3.5-16	Increases CTS allowed outage time from 1 hour to 72 hours for boron concentration in one accumulator to be outside its limits.	LCO 3.5.1	NA	5
L3.5-19	Increases CTS Completion Time from 1 hour to 8 hours to restore the RWST boron concentration to within its limits.	LCO 3.5.4	NA	5, 8
L3.5-25	Increases CTS SR interval from 18 to 24 months for throttle valve position verification.	SR 3.5.2.7	SR 4.5.B.3.g.3	7

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.5-310	Relaxes CTS requirements adding a Note allowing, in MODE 3, both SI pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing.	SR 3.4.15.1	LCO 3.3	1, 4, 5
L3.5-315	Relaxes CTS requirements allowing combinations of ECCS components or subsystems to be inoperable provided at least 100% ECCS flow equivalent of a single ECCS train remains OPERABLE.	LCO 3.5.2	LCO 3.3.A.2.f	4, 5, 8
L3.5-317	Eliminates CTS OPERABILITY requirements for valve position monitor lights for SI valves and RHR valves, and requires valve position monitor lights and alarms to be OPERABLE for ECCS accumulator valves.	NA	LCO 3.3.A.1.g and 3.3.A.2.g	1, 4

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-43	Relaxes CTS requirements by allowing passage through an inoperable air lock door for up to seven days if both air locks are inoperable.	LCO 3.6.2, Condition A	LCO 3.6.M.2	4, 5, 8
L3.6-46	Relaxes CTS requirements by allowing verification of locked air lock doors in high radiation areas by administrative means.	LCO 3.6.2, Conditions A and B	LCO 3.6.M.2.b	4
L3.6-53	Increase CTS SR interval from monthly to 184 days to test the caustic standpipe NaOH concentration.	SR 3.6.6.3	Table 4.1-2B Item 11	9
L3.6-63	Relaxes CTS requirements by allowing the system test to be initiated by an actual or simulated signal instead of just a simulated signal.	SR 3.1.5.3, 3.1.5.4, 3.6.3.7, 3.6.5.5, 3.6.5.6, 3.6.5.7, 3.6.6.4, and 3.6.8.1, 3.6.3.7	SR4.4.B.3.c, 4.4.C, 4.4.E, 4.5.A.2.a, and 4.5.B.3.f	3
L3.6-74	Relaxes CTS requirements for declaring an air lock door inoperable based on the interlock mechanism.	LCO 3.6.3, Condition B	LCO 3.6.M.3	4

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-75	Relaxes CTS requirements for initiating a reactor shutdown when one air lock is inoperable and an inoperability on the other air lock by allowing separate Condition entry for each air lock thus delaying or avoiding a reactor shutdown.	LCO 3.6.2	LCO 3.6.M	3
L3.6-76	Relaxes CTS requirements for requiring both access doors to be closed by allowing one door being verified closed.	SR 3.6.10.1	1.0	4
L3.6-81	Eliminates CTS requirements for allowing one of several conditions of inoperability existing at one time to allowing simultaneous inoperabilities for the same equipment.	LCO 3.6.5	LCO 3.3.B.2	4, 8
L3.6-83	Relaxes CTS requirements to enter CTS 3.0.C if two valves in the vacuum breaker system were inoperable with respect to their vacuum relief function. The ITS will allow the plant to continue operation if two valves in the same train are inoperable with respect to their two containment isolation valves in the same train are inoperable.	LCO 3.6.5	LCO 3.6.B.2, 3.6.B.3, and 3.0.C	1, 8
L3.6-87	Increases CTS SR interval from 18 to 24 months for testing the Shield Building Ventilation System initiated from a safety injection signal.	3.6.9.3	4.4.B.3.c	7

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.6 – Containment Systems
 (DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.6-90	Relaxes CTS requirements by allowing entry into both the VBT and Containment Isolation Valve TS in the event of an VBT inoperability.	3.6.3 and 3.6.8	3.6.B.1 and 3.6.B.2	4, 5

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-03	Increases CTS Completion Time from requiring entry into a reactor shutdown track to allowing 4 hours to restore the inoperable MSSV to operable status before beginning preparations to shut the plant down.	LCO 3.7.1 Cond A	LCO 3.4.A.1 and 3.0.C	5, 8
L3.7-07	Increases CTS Completion Time from 48 hours to 7 days for one SG PORV to be inoperable and 1 hour for two SG PORVs inoperable instead of entering a reactor shutdown track as would be required by the CTS.	LCO 3.7.4 Cond A and B	LCO 3.4.A.2.a and 3.0.C	5, 8
L3.7-11	Relaxes CTS requirements by considering the AFW operable during alignment and operation for SG level control if capable of being manually realigned to the AFW mode of operation.	LCO 3.7.5	LCO 3.4.B.1.c	1, 3, 4
L3.7-22	Increases CTS Completion Time from 72 hours to 7 days and 10 days from discovery of failure to meet the LCO with one steam supply to the turbine driven AFW pump inoperable .	LCO 3.7.5 Cond A	LCO 3.4.B.2	5
L3.7-25	Increases CTS Completion Time from 48 hours to 7 days to restore an inoperable CST to OPERABLE.	LCO 3.7.6 Cond A	LCO 3.4.B.2.c	5

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems**
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-89	Eliminates CTS requirement to verify the normal AFW flow path to the SGs after each cold shutdown.	NA	SR 4.8.A.7	3
L3.7-91	Increases CTS SR interval from 18 to 24 months for verifying AFW system automatic actuation.	SR 3.7.5.3 3.7.5.4	SR 4.8.A.8	7
L3.7-92	Relaxes CTS requirements by requiring verification of valve position for those valves that are not locked, sealed, or otherwise secured in position.	SR 3.7.5.3, 3.7.7.2, 3.7.7.3, and 3.7.8.3	SR 4.8.A.8 4.5.A.4, and 4.5.A.5	3
L3.7-93	Increases CTS flexibility by allowing credit to be taken for the performance of the SR by using either a test or actual signal.	SR 3.7.2.2, 3.7.5.4, 3.7.7.2, 3.7.8.5, 3.7.10.3, 3.7.12.4, and 3.7.13.3	SR 4.7, 4.8.A.8, 4.5.A.4, 4.5.A.5, 4.14.A.2, 4.4.B.3.c, 4.4.E, 4.14.A.2, and 4.15.A.2	3
L3.7-95	Increases CTS interval from monthly to quarterly for testing of the SG PORVs.	SR 3.7.4.1	SR4.8.B	9

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.7 – Plant Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.7-101	Increases CTS SR interval from 18 to 24 months to test the automatic initiation of the Control Room Special Ventilation System.	SR 3.7.10.3	SR 4.4.2.B.3, 4.14.A, and 4.15.A	7
L3.7-103	Increases CTS SR interval from at least once per operating cycle to 24 months on a staggered test basis to test the Control Room Special Ventilation System.	SR 3.7.10.4 and 3.7.13.4	SR 4.14.B.1.c and 4.15.B.1.c	7
L3.7-114	Relaxes CTS requirements for entering into LCO 3.0.C when two MSIVs are inoperable at the same time by allowing separate Condition entry for each MSIV.	LCO 3.7.2 Cond C	Table 3.5-2B Action 27 and 3.0.C	4
L3.7-117	Eliminates CTS requirements of only allowing one of several conditions of inoperability existing at one time to allow simultaneous inoperabilities for the same equipment.	LCO 3.7.7 Cond B	LCO 3.3.C.1.b	4, 8
L3.7-118	Relaxes CTS requirements initiating a reactor shutdown if the control room boundary is not intact to allowing the boundary to be intermittently open under administrative controls. In addition, the ITS allows two CRSVS trains to be inoperable for 24 hours, due to control room boundary in MODES 1, 2, 3, and 4.	LCO3.7.10 Cond B	LCO 3.13.A.1	1, 2, 8

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

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

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.8-12	Relaxes CTS requirements allowing 48 hours to restore fuel oil supply instead of declaring the DGs inoperable when the fuel oil gets to a specific level.	LCO 3.8.1 and 3.8.3 Cond A	LCO 3.7.A.5	5
L3.8-16	Relaxes CTS requirements of declaring supported equipment inoperable and potential shutdown by implementing ITS LCO 3.0.6 (SFDP).	LCO 3.8.9 Cond A, B and E	LCO 3.7.B.6	1, 4
L3.8-28	Relaxes CTS SR testing by allowing the performance of a modified start test for the DG.	SR 3.8.1.2 Notes 1 and 3	SR 4.6.A.1.e	3
L3.8-29	Increases CTS flexibility by not invalidating a SR if there is a momentary transient outside the load range of the DG.	SR 3.8.1.3 Notes 2, 3, and 4	SR 4.6.A.1.e	3
L3.8-35	Increases CTS Frequency from 18 months to 24 months for various testing of the DG.	SR 3.8.1.10	SR 4.6.A.3	7

CHANGE TYPES

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

Table L – Less Restrictive Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.8-36	Relaxes CTS requirements allowing credit to be taken for an actual signal to initiate the protective function being tested.	SR 3.8.1.10	SR 4.6.A.3.b and e	3
L3.8-46	Eliminates CTS SR for verifying the station battery fuses are good when the battery charger is running.	NA	SR 4.6.B.5	3
L3.8-59	Relaxes CTS requirements for testing the DG upon the associated DG failure to start. The ITS allows an evaluation to be performed to verify that the failure was not due to common cause.	LCO 3.8.1 Cond B	LCO 3.7.B.1	3, 4
L3.8-61	Eliminates CTS testing requirement that the DG be manually synchronized and loaded to a specific rating in less than 60 seconds and operate for at least one hour every 6 months.	NA	SR 4.6.A.2.b	3, 9

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.9-04	Relaxes CTS requirements from considering accidents postulated to occur during core alteration, inadvertent criticality (inadvertent loading of, and subsequent operation with a fuel assembly in an improper location) to only considering the fuel handling accident.	LCO 3.9.4	LCO 3.8.A.1.a	2
L3.9-31	Eliminates CTS requirements to verify water level prior to moving fuel or control rods. The ITS only requires water level to be verified prior to commencing movement of fuel.	SR 3.9.2.1	LCO 3.8.A.1.e, Table 4.1-2A Test 5	3
L3.9-34	Eliminates CTS requirement from allowing the operating RHR pump to be shut down for up to one hour to facilitate movement of fuel or core components to allow the RHR pump to be shutdown for one hour for any reason.	LCO 3.9.6	LCO 3.8.A.1.f	1, 4, 5
L3.9-49	Reduces CTS Frequency from daily to 3 days for verification of boron concentration.	LCO 3.9.1.1	Table 4.1-2B, Note 5	9
L3.9-54	Relaxes CTS requirements requiring two RHR loops OPERABLE to allowing one pump to be inoperable for up to 2 hours for SR testing.	LCO 3.9.6, Note 2	LCO 3.8.A.1.g	1, 4, 5
L3.4-55	Relaxes CTS requirements by allowing penetration flow paths to be open under administrative controls.	LCO 3.9.4	LCO 3.8.A.1.a(2)	1

CHANGE TYPES

1

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

Boeing Island ITS

Table L – Less Restrictive Changes
ITS Section 3.9 – Refueling Operations
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L3.9-56	Relaxes CTS requirements for the air lock doors to be OPERABLE to ensuring they can be closed within 30 minutes during movement of irradiated fuel.	LCO 3.9.4	LCO 3.8.a.1.a.2).b .III.	1, 2

CHANGE TYPES

2

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

Prairie Island ITS

**Table L – Less Restrictive Changes
ITS Section 4.0 – Design Features**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L4.0-03	Relaxes CTS intent by limiting fuel assemblies to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases.	4.2	5.3.A	6

CHANGE TYPES

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

**Table L – Less Restrictive Changes
ITS Section 5.0 – Administrative Controls**
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Sect	Change Type
L5.0-21	Increases CTS flexibility in scheduling by incorporating the provisions of ITS SR 3.0.2 and SR 3.0.3 to the Radioactive Effluent Controls Program.	5.5.4	6.5.D	9

CHANGE TYPES

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