Table M – More Restrictive Changes
ITS Section 1.0 – Use and Application
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 1.0 – Use and Application
(DOC No. are numbered sequentially by ITS Section)

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

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

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

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

DOC No.	Summary	ITS Section	CTS Section
M3.0-03	Adds new, more restrictive LCO requiring the plant to be in MODE 4 within 13 hours following entry into LCO 3.0.3.	LCO 3.0.3	LCO 3.0.C.1
M3.0-06	Adds new LCO restrictions, which preclude entry into a MODE or Other Specified Condition in the Applicability (MOSCA) when a LCO is not met. The new LOC 3.0.4 may impose restrictions on the changes in MOSCA which do not exist in the CTS.	LCO 3.0.4	NA
M3.0-07	Adds new LCO, which restricts current plant practices allowing equipment to be removed from service or declared inoperable to comply with ACTIONS.	LCO 3.0.5	NA
M3.0-11	Adds new LCO, which restricts current plant practices clarifying actions necessary to be taken when a system or support system that has its own LCO is inoperable. The supported system(s) are not required to be declared inoperable if they are inoperable due to support system inoperability. The supported systems' Conditions and Required Actions are not entered unless directed to do so by the support system's Required Actions.	LCO 3.0.6	NA
M3.0-14	Add new SR "fixed intervals" to the CTS for SR management program. The ITS retains CTS requirements for the refueling cycle, limiting the refueling cycle to two years.	LCO 3.0.2	LCO 4.0.A.1 and 4.0.A.2
M3.0-16	Adds new SR supporting the ITS format changes and makes the ITS complete by not allowing plant operation or testing that will cause an unsafe condition.	SR 3.0.2	LCO 4.0.A.1
M3.0-19	Adds new SR establishing the requirement that all applicable SRs shall be met before entry into a MODE or Other Specified Condition in the Applicability.	SR 3.0.4	NA

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

DOC No.	Summary	ITS Section	CTS Section
M3.1-04	Adds new LCO requirements that the lower ITC limits shall be met in MODES 1, 2, and 3.	LCO 3.1.3	LCO 3.1.F.1
M3.1-09	Adds new Required Action to address the EOC lower limit.	LCO 3.1.3, Conditions C and D	NA
M3.1-11	Adds new SRs to verify that the ITC is within the upper limit and to verify that the ITC will be within limits when RTP reaches 70%.	SR 3.1.3.1, 3.1.3.2, and 3.1.3.3	NA
M3.1-17	Adds a new SR to verify SDM is within limits every 24 hours.	SR 3.1.1.1	LCO 3.10.A.2
M3.1-18	Adds specific Required Actions and shutdown requirements when the core reactivity differs from the predicted value.	LCO 3.1.1 and 3.1.2, Conditions A and B	LCO 3.10.A.3 and SR 4.9
M3.1-19	Adds new SR to verify measured core reactivity is within limits prior to entering MODE 1 after each refueling outage.	SR 3.1.2.1	LCO 3.10.A
M3.1-22	Adds a new SR to verify every 12 hours that shutdown banks are within their insertion limits as specified in the COLR.	SR 3.1.5.1	LCO 3.10.D
M3.1-24	Adds new Condition and Required Actions to ensure that the control bank sequence and overlap limits shall be met or the unit must be placed in MODE 2 with Keff $\geq$ 1.0.	LCO 3.1.6	LCO 3.10.D.2
M3.1-27	Adds new SRs to verify estimated critical control bank position is within limits in the COLR, verify control banks are within their insertion limits and verify sequence and overlap limits are met.	SR 3.1.6.1, 3.1.6.2, and 3.1.6.3	LCO 3.10.D.3

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

DOC No.	Summary	ITS Section	CTS Section
M3.1-29	Adds new SRs to perform a COT on power and intermediate range NIS channels, verify RCS lowest loop average temperature, verify Thermal Power and verify SDM is within limits.	SR 3.1.8.1, 3.1.8.2, 3.1.8.3, and 3.1.4.4	LCO 3.10.D.3
M3.1-31	Reduces CTS flexibility to perform the rod worth measurement in the N-1 condition.	NA	LCO 3.10.D.3
M3.1-32	Adds new Required Actions verifying that the SDM requirements are met or initiate boration if a cluster control assembly is misaligned from its bank by more than 24 steps.	LCO 3.1.4, Condition B	LCO 3.10.E.1
M3.1-38	Expands the MODE of Applicability from MODE 1 to include both MODES 1 and 2. CTS requires each channel of the RPI to be OPERABLE in MODE 1. The ITS extends the MODE of Applicability to MODE 2.	LCO 3.1.7	LCO 3.10.F.1, 3.10.F.2, 3.10.F.3, and 3.10.F.4
M3.1-42	Adds a new Action Statement for demand position indications.	LCO 3.1.7, Condition A	LCO 3.10.F
M3.1-44	Reduces operational flexibility by imposing a restriction that with one or more rods inoperable, restore the inoperable rod to OPERABLE within 6 hours or be in MODE 3, whereas the CTS would allow continued operation with one rod inoperable.	LCO 3.1.4, Condition A	LCO 3.10.G.2
M3.1-47	Adds requirements that whenever a rod is inoperable, the SDM requirements shall be met within one hour or initiate boration.	LCO 3.1.4, Condition A	LCO 3.10.G.3 and 3.10.G.4
M3.1-53	Adds a new Condition and Required Actions that with one rod inoperable, the unit is to be in MODE 3 within 6 hours. The CTS would require the rod to be declared inoperable and operation can continue.	LCO 3.1.4, Condition C	LCO 3.10.G

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

DOC No.	Summary	ITS Section	CTS Section
M3.1-62	Reduces flexibility in that the ITS requires a normalization of the computed boron concentration as a function of burnup within 60 days whereas the CTS requires the same test to be performed without any time constraints.	SR 3.1.2.2	SR 4.9
M3.1-66	Changes the distance the control rods are required to be moved to 10 or more steps every quarter to demonstrate OPERABILITY whereas the CTS does not have specific distance for rod movement.	SR 3.1.4.2	Table 4.1-2A Item 2

Table M – More Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.2-08	Adds specific time requirements to determine Fq(Z) within 12 hours of reaching equilibrium conditions.	SR 3.2.1.2	LCO 3.10.B.2.b
M3.2-11	Adds new SRs to determine Fcq and FnΔH are within limits.	SR 3.2.1.1 and 3.2.2.1	3.10.B.2.c
M3.2-12	Adds a specific time of 72 hours to reset the high neutron flux trip set point and requires a power reduction within 15 minutes if the hot channel factor cannot be restored to within limits.	LCO 3.2.1, Condition A	LCO 3.10.B.3.a and 3.10.B.3(b)2
M3.2-13	Adds stricter power reduction requirements to the CTS if the hot channel factor exceeds the limits in COLR. Power is required to be reduced by a percentage specified in the COLR whereas, the ITS requires the power level to be reduced to < 50% and the neutron high flux trip set point to ≤ 55% for the same condition.	LCO 3.2.1, Condition A	LCO 3.10.B.3(a)
M3.2-14	Deletes the option of placing the reactor in an equilibrium configuration when the hot channel factor is not within limits.	LCO 3.2.1, Condition B	LCO 3.10.B.3.b.1
M3.2-15	Reduces the time allow to place the reactor in MODE 3 from 24 hours to MODE 2 within 6 hours when the hot channel factors exceed specific limits in the COLR.	LCO 3.2.1, Condition C and LCO 3.2.2 Condition B	LCO 3.10.B.3.a
M3.2-16	Adds new Action Statements requiring performance of specific SRs and associated Frequencies to determine the hot channel factors.	LCO 3.2.1 and 3.2.2	LCO 3.10.B.3.a and 3.10.B.3.b
M3.2-19	Adds requirements to re-verify Fq(z) is within limits after Fq(z) has been multiplied by the appropriate factors in the COLR.	SR 3.2.1.2	LCO 3.10.B.3.d
M3.2-31	Adds a Completion Time of 30 minutes to correct the AFD power levels at or above 50% RTP to 90% RTP. In addition a Note is added to require completion of this Required Action once it is entered.	LCO 3.2.3, Condition C	LCO 3.10.B.6(b)

Table M – More Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.2-36	Adds new SR to verify the AFD is within limits on a 7 day Frequency.	SR 3.2.3.1	NA
M3.2-39	Adds restrictions on plant operations requiring the power level to be reduced by 3% for every 1% that the QPTR exceeds 1.0 whereas the CTS only requires that core power level be reduced by 2% for every 1% that the QPTR exceeds 1.0.	LCO 3.2.4, Condition A	LCO 3.10.C.1
M3.2-41	Revises or adds remedial actions for QPTR outside limits. A new Required Action requires the determination of the QPTR once per 12 hours; replaces requirements to maintain QPTR below 1.07 and perform monitoring and logging with performing additional SRs to verify specific hot channel factors, perform additional SR to ensure that the reactor is maintained in a safe configuration, re-evaluate safety analyses and confirm validity for operation prior to increasing power, requires the excore detectors are normalized to restore QPTR to within limits prior to increasing power above the limit, and finally provides an Action for power reduction below 50% RTP within 4 hours if the new Required Actions cannot be met.	LCO 3.2.4, Condition A	LCO 3.10.C.1
M3.2-43	Adds a new SR requiring performance of a calculation every 7 days verifying that QPTR is within limit.	SR 3.2.4.1	NA
M3.2-46	Increases the SR Frequency to each shift rather than daily or after each 10% power change. The presentation of this test requirement has also been revised to state "Note, not required to be performed until 12 hours after core is operating above 85% power with one or more excore nuclear channel inoperable".	SR 3.2.4.2	LCO 3.10.C.4
M3.2-51	Adds new requirement to determine Fwq 12 hours after achieving equilibrium thereby, allowing the core parameters to stabilize.	SR 3.2.1.2	LCO 3.10.B.2
M3.2-52	Adds new SR Note requiring verification of heat flux channel factors at the beginning of each cycle when an equilibrium power level has been achieved.	SRs 3.2.1	LCO 3.10.B.2
M3.2-53	Adds new requirements to perform a SR on the nuclear enthalpy rise hot channel factor within 24 hours when the measured hot channel factor is not within the COLR limits.	LCO 3.2.1 and SR 3.2.2.1	LCO 3.10.B.3.a

Table M – More Restrictive Changes
ITS Section 3.2 –Power Distribution Limits
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 3.3 –Instrumentation
(L·)C No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.3-12	Adds new requirements for when one or more Control Rods are not fully inserted.	Table 3.3.1-1, Note a	Table 3.5-2A Note a, Table 4.1-1 Note 1, Table 3.5-2A Note a, and Table 4.1-1A Note 1
M3.3-15	Adds a new Function to the CTS for the RTS interlocks, number of OPERABLE channels, Applicable MODES, Required Actions, and Surveillance Testing.	Table 3.3.1-1, FU 16 and LCO 3.3.1 Cond Q, R, and S	Table 3.5-2A and Table 4.1-1A Function 16
M3.3-16	Adds new requirements and operational constraints for RTB Undervoltage and Shunt Trip Mechanism.	Table 3.3.1-1, FU 17 and 18	Table 3.5-2A and Table 4.1-1A Function 19
M3.3-17	Modifies CTS Note providing additional restrictions for the reactor trip system OPERABILITY under specific plant conditions.	Table 3.3.1-1, Note h	Table 3.5-2A Note d and Table 4.1-1A Note 16
M3.3-26	Adds new Required Action to CTS to address when two source range neutron flux channels are inoperable.	LCO 3.3.1 Cond I	Table 3.5-1A, Action 4
M3.3-32	Reduces CTS Completion Time to repair a diverse trip feature, place the breaker in bypass, or declare it inoperable from 48 hours to 4 hours.	Table 3.3.1-1 and LCO 3.3.1, Cond J and P	Table 3.5-2A Action 9

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

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

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

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

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

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

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.4-43	Adds new Required Actions for the possibility that the pressurizer is inoperable.	LCO 3.4.9, Condition A	LCO 3.1.A.2.a(3)
M3.4-44	Adds a new SR requiring periodic verification that the pressurizer water level is ≤ 90%.	SR 3.4.9.1	NA
M3.4-45	Restricts CTS APPLICABILITY by requiring two RCS PSVs to be operable whenever both RCS cold leg temperatures are greater than the OPPS enable temperature specified in the PTLR. This requires more components to be operable for more plant conditions.	LCO 3.4.10 and 3.4.10, Condition B	LCO 3.1.A.2.b(1)
M3.4-51	Adds new Action Statements and restrictions requiring immediate action to be taken for the Condition of one or two SI pumps being capable of injecting into the RCS. The CTS would allow 1 hour to take action instead of being required to immediately take action.	LCO 3.4.12 and 3.4.13, Condition A	LCO 3.1.A.2.c(2) and 3.1.A.2.c(3)
M3.4-52	Adds a new Required Action, Completion Time, and SR restrictions to the CTS for ECCS accumulator isolation.	LCO 3.4.12 and 3.4.13, Condition B, and SR 3.4.13.1, 3.4.13.2, 3.4.13.3, and 3.4.13.4	LCO 3.1.A.2.c (2) and 3.1.A.2.c(3)
M3.4-54	Adds new SRs and associated Frequencies requiring verification that only one (or no) SI pump capable of injecting, RCS is vented and PORV block valves are open as applicable for the MODES of operation and the method of providing overpressurization protection.	SR 3.4.12.1, 3.4.12.2, 3.4.12.3, 3.4.13.1, 3.4.13.2, 3.4.13.3, and 3.4.13.4	NA

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.4-57	Adds a new Specification, LCO, Conditions, and SRs for RCS Minimum Temperature for Criticality.	LCO 3.4.2 and SR 3.4.2.1	NA
M3.4-62	Adds Frequency of 72 hours for evaluating the integrity of the RCS following an out-of-limit condition.	LCO 3.4.3, Condition A	LCO 3.1.B.1.b
M3.4-63	Adds new Required Actions for out-of-limit conditions when the RCS is below 200 °F.	LCO 3.4.3, Condition C	LCO 3.1.B.1.b
M3.4-64	Adds new SR to verify that RCS pressure, temperature and heatup and cooldown rates are within the specified limits.	SR 3.4.3.1	NA
M3.4-72	Adds SRs to perform Channel Checks, COTs and Calibrations of containment radiation monitors and Calibration of sump pump run time instrumentation.	SR 3.4.16.1, 3.4.16.2, 3.4.16.3, and 3.4.16.4	NA
M3.4-81	Adds a Frequency of every 4 hours for verifying that the limits of dose equivalent I-131 primary coolant specific activity limit are within limits.	LCO 3.4.17, Condition A	LCO 3.1.D.2.a
M3.4-84	Increases the Frequency to perform the functional test of the OPPS from each refueling outage to monthly when the RCS temperature is below the LTOP enable temperature.	SR 3.4.12.4	Table 4.1-1C Item 25
M3.4-85	Adds a Frequency of 12 hours to perform the OPPS mitigation SR.	SR 3.4.12.4	Table 4.1-1C Note 38
M3.4-108	Adds Frequency requirements to perform a RCS flow test within 72 hours after reaching 90% RTP.	SR 3.4.1.3	LCO 3.10.J
M3.4-117	Adds a specific limit of 31 days to the CTS for initial performance of RCS Radiochemistry E determination.	SR 3.4.17.3	Table 4.1-2B Note 1

Table M – More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
M3.4-123	Eliminates CTS flexibility by requiring that the block valves be restored to OPERABLE and does not provide an alternate option of placing the PORVs in manual as in the CTS.	LCO 3.4.10	3.1.A.2.c (1)(b)5
M3.4-129	Adds a new condition to CTS for the PORVs inoperable yet capable of being manually cycled.	LCO 3.4.11 Condition A	LCO 3.1.A.2.e(1)(a)1
M3.4-130	Adds a new requirement to the CTS, that the PORVs are inoperable if they are not capable of being manually cycled.	LCO 3.4.11 Condition B and E	LCO 3.1.A.2.e(1)(b)2 and 3
M3.4-131	Adds LCO requirement to CTS stating that the Pressurizer Heaters must be OPERABLE.	LCO 3.4.9	LCO 3.1.A.2.a and SR 4.6.C

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

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

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

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

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

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

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

DOC No.	Summary	ITS Section	CTS Section
M3.6-38	Eliminates CTS flexibility of allowing 1 hour to prepare for a reactor shutdown. Instead the ITS requires the plant to initiate shutdown when the Required Actions and associated Completion Times are not met.	LCO 3.6.3, Condition E	LCO 3.6.C.3
M3.6-39	Eliminates CTS flexibility of allowing 1 hour to prepare for a reactor shutdown if a recombiner is inoperable for more than 30 days. Instead the ITS requires the plant to initiate shutdown when the Required Actions and associated Completion Times are not met.	LCO 3.6.7, Condition B	LCO 3.6.L.2
M3.6-41	Adds new SR requiring verification that containment pressure is within limits.	SR 3.6.4.1	NA
M3.6-44	Adds a Completion Time that in one hour verify that the OPERABLE air lock door is closed.	LCO 3.6.2, Condition A	LCO 3.6.M.2.a
M3.6-51	Adds new requirements to immediately verify containment leakage rates and 1 hour to verify that one air lock door is closed.	LCO 3.6.2, Condition C	LCO 3.6.M.3
M3.6-52	Adds a new SR requiring verification only one air lock door can be opened at a time.	SR 3.6.2.2	NA
M3.6-61	Reduces CTS flexibility replacing terminology of a circuit with a train. A train may include more equipment than a circuit.	SR 3.6.9.1	SR 4.4.B.4.d
M3.6-68	Adds a new requirement generating additional actions that if the secondary containment bypass leakage is not within limits, restore to within limits, within 4 hours.	LCO 3.6.3 Condition D	LCO 3.6.B.3
M3.6-82	Adds a new Note which requires entry into the "Containment Integrity" Specification when vacuum breaker isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.	LCO 3.6.8	LCO 3.6.B.3
M3.6-89	Eliminates CTS flexibility by restricting the time allowed for one containment fan cooler train and one containment spray train to be out of service to 10 days from discovery of failure to meet the LCO. The CTS does not require such a limitation.	LCO 3.6.5, Conditions A and C	LCO 3.3.B.2.a and 3.3.B.2.b

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

DOC No.	Summary	ITS Section	CTS Section
M3.6-91	Reduces CTS Completion Time from 8 hours to 1 hour to correct the temperature of the containment shell or temperature differential between the containment air temperature and shield building annulus.	LCO 3.6.1, Condition A	LCO 3.6.J.2 and 3.6.K.2

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

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

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

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

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

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

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

DOC No.	Summary	ITS Section	CTS Section
M3.7-104	Increases CTS SR requirements from only requiring the Control Room Ventilation circuits to be operated monthly to operating the entire system.	SR 3.7.10.1, 3.7.12.1, and 3.7.13.1	SR 4.14.B.4, 4.4.B.4.d and 4.15.B.4
M3.7-107	Adds a new SR requiring verification of each fuel assembly prior to moving the assembly.	SR 3.7.17.1	SR 4.20
M3.7-108	Reduces CTS interval for performing the RCS activity level SR from every six months when the activity level is less than 10% of the limit, to every 31 days regardless the activity level.	SR 3.7.14.1	Table 4.1-2B Item 15 and Note 5
M3.7-109	Restricts CTS allowed outage time for the AFW equipment to a maximum of 10 days from discovery of failure to meet the LCO.	LCO 3.7.5 Cond B	LCO 3.4.B.2.a
M3.7-110	Restricts CTS allowed outage time for the Cooling Water pump or header to a maximum of 10 days from discovery of failure to meet the LCO.	LCO 3.7.8 Cond B and C	LCO 3.3.D.2.a and 3.3.D.2.b
M3.7-115	Increases the CTS volume of fuel oil supply required for the CL diesel from 19,000 to 19,500 gallons.	LCO 3.7.8	LCO 3.3.D.1.d
M3.7-116	Adds a new SR requiring the SG PORV block valves be manually cycled every 24 months.	SR 3.7.4.2	SR 4.8.B
M3.7-119	Adds Completion Time for closing an inoperable MSIV in 8 hours before initiating the shutdown track whereas the CTS does not provide any Completion Time.	LCO 3.7.2 Cond D	Table 3.5-2B Action 27
M3.7-120	Increases APPLICABILITY requirements to include MODE 4 for SG PORVs, when SG used to remove decay heat, motor driven AFW train and CSTs.	LCO 3.7.4, 3.7.5, and 3.7.6	3.4
M3.7-121	Increases CTS requirements from requiring two PORVs OPERABLE to requiring two OPERABLE PORV lines. The ITS will require more equipment to be OPERABLE.	LCO 3.7.4	LCO 3.4.A.1.b

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

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

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

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

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

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

Table M – More restrictive Changes
ITS Section 3.9 – Refueling Operations
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More restrictive Changes
ITS Section 3.9 – Refueling Operations
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 4.0 – Design Features
(DOC No. are numbered sequentially by ITS Section)

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

Table M – More Restrictive Changes
ITS Section 5.0 – Administrative Controls
(DOC No. are numbered sequentially by ITS Section)

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