

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|--|---------------------------------|
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 1.0 | 1.1 |
| A.2 | Removes CTS Definitions that are not used in the ITS because the current Technical Specifications that use these definitions are not retained in the ITS. | 1.4.1 1.4.2 1.5 1.6.4 1.9 T 1-1 | 1.1 |
| A.3 | Clarifies definition of Channel Calibration by adding details that are consistent with a reasonable interpretation of the existing definition. | 1.6.3 | 1.1 |
| A.4 | Clarifies that CTS term "injection of a simulated signal" can be interpreted as allowing use of either an actual or simulated signal to verify that a channel is Operable. | 1.6.2 | 1.1 |
| A.5 | Clarifies definition of Channel Functional Test by adding details that are consistent with a reasonable interpretation of the existing definition and changes name of test from Instrument Channel Functional Test to Channel Operational Test (COT). | 1.6.2 | 1.1 |
| A.6 | Eliminates use of the term 'closed system' from the definition of Identified Leakage without changing any requirements about what is considered Identified Leakage. | 1.12.a | 1.1 |
| A.7 | Eliminates specific reference to leakage through the RCS/RHR pressure isolation valves in the definition of Identified Leakage because it is covered by the general definition of Identified Leakage. | 1.12.c | 1.1 3.4.13 LCO 3.4.14 LCO |
| A.8 | Clarifies that a component is Operable if it is supported by either its normal or its emergency power supply. | 1.3 | 1.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------------|-------------------------|
| A.9 | Substitutes the ITS term "total reactor core heat transfer rate to the reactor coolant" for the CTS term "steady state reactor thermal power" to clarify that the rated limit for reactor heat production is 3071.4 megawatts thermal. | 1.1.a | 1.1 |
| A.10 | Substitutes the ITS clarification that decay heat is excluded when determining if the reactor power level places the reactor in Modes 1 and 2 (i.e., neutron flux power range instrumentation is used without adjustment for decay heat variations related to recent power level changes) for the CTS clarification that "neutron flux power range instrumentation" is used to determine when reactor power is high enough such that the reactor is considered in the Power Operation Condition. | 1.2.4 | 1.1 T 1.1-1 |
| A.11 | Clarifies that CTS LCOs that are Applicable when the reactor is critical are considered Applicable during approaches to criticality and power level reductions where keff falls below 1.0. | 1.2.3 | 1.1 T 1.1-1 |
| A.12 | Clarifies that ITS uses a combination of the definition of Mode 3 and the requirements in ITS LCO 3.1.1, Shutdown Margin, to establish requirements for SDM in Mode 3. | 1.2.2 F 3.10-1 | 1.1 3.1.1 T 1.1-1 |
| A.13 | Clarifies that ITS definitions in ITS Table 1.1-1 provides formal recognition of the CTS practice of differentiating between "Hot Standby" when greater than or equal to 350°F (Mode 3) and "Hot Shutdown" when less than 350°F (Mode 4). | 1.2.2 | 1.1 T 1.1-1 |
| A.14 | Deletes a footnote that allows the plant to be considered in cold shutdown at a temperature up to 250°F during a one time chemical decontamination program when the fuel is removed | 1.2.2 | 1.1 |
| A.15 | Clarifies use of Technical Specifications by adding explanations in TS: Section 1.2 - Logical Connectors; Section 1.3 - Completion Times; and, Section 1.4 - Frequency. | 1.0 | 1.2 1.3 1.4 |
| A.16 | Adds explicit clarification that RCP seal water injection and leakoff is excluded when calculating Identified Leakage. | 1.12 | 1.1 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------------|-----------------------|
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 2.1 2.2 6.7 | 2.1.1 2.1.2 2.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 2.1 2.2 | 2.0 |
| A.3 | Clarifies that limitations on reactor power, pressure and temperature apply in Modes 1 and 2. Clarifies that the limitation on coolant pressure applies to pressurizer pressure. Clarifies that the limitation on coolant temperature applies to the highest loop average temperature. | 2.1 | 2.1.1 |
| A.4 | Clarifies that safety limit for the maximum RCS pressure is applicable in Modes 1, 2, 3, 4 and 5 and in Mode 6 when the reactor vessel head is on. | 2.1 | 2.1.1 2.1.2 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------|---|
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.0 4.0 | 3.0 |
| A.2 | Revises nomenclature for CTS terms including hot shutdown and cold shutdown to the ITS terms Mode 1, 2, 3, 4, and 5. | 3.0.1 | 3.0.3 LCO |
| A.3 | Adds the interim requirement to be in Mode 4 within 13 hours when proceeding to Mode 5 within 37 hours. | 3.0.1 | 3.0.3 LCO |
| A.4 | Clarifies that ITS LCO 3.0.3 is Applicable only in Modes 1, 2, 3 and 4. | 3.0.1 | 3.0.3 LCO |
| A.5 | Maintains existing exemptions from allowance for 25% extension to SR Frequencies to the Programs to which the SR extension does not apply. | 4.0.1 | 3.0.2 SR 3.6.9.6 SR 3.6.10.3 SR 5.5.14 LCO |
| A.6 | Clarifies that SRs must be met whenever an LCO is Applicable, unless otherwise stated and that failure to meet a Surveillance during the performance or between performances is a failure to meet the LCO. | 4.0.2 | 3.0.1 SR 3.0.3 SR |
| A.7 | Clarifies that each of the ITS LCOs must be met during the Modes or other specified conditions in that LCO's Applicability. | 3.0 | 3.0.1 LCO |
| A.8 | Clarifies that associated Required Actions must be met whenever an LCO is not met. Additionally, clarifies that completion of the Required Action is not required unless otherwise stated if the LCO is met or is no longer applicable prior to expiration of the specified Completion Time. | 3.0 | 3.0.2 LCO |
| A.9 | Clarifies that the ITS is designed so that Actions associated with a supported system are not required to be performed if the Actions for the support system exist and are met. | 3.0 | 3.0.6 LCO 3.0.2 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------|------------------------|
| A.10 | Clarifies that the test exception LCO allows specified Technical Specification requirements to be changed (made applicable in part or whole, or suspended) to permit the performance of special tests or operations that otherwise could not be performed. | 3.0 | 3.0.7 LCO 3.1.8 LCO |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|-------------|------------------------|
| ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN (SDM) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10 | 3.1.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.1 |
| ITS SPECIFICATION 3.1.2 - CORE REACTIVITY | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 4.9 | 3.1.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.9 | 3.1.2 |
| ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.C.1 | 3.1.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.1.3 |
| A.3 | Adopts the nomenclature and presentation used in NUREG-1431, Rev. 2, by changing "reactor not be made critical at any temperature above which the moderator temperature coefficient is positive" to Moderator Temperature Coefficient (MTC) maximum upper limit | 3.1.C.1 | 3.1.3 APP 3.1.3 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------------------------|-----------------------------------|
| ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10 | 3.1.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.4 |
| A.3 | Establishes consistent terminology between the ITS LCO 3.1.4 requirements (rod Operability and alignment), the ITS SRs that verify these LCO requirements are met, and the Conditions and Required Actions that are applicable if these requirements are not met. | 3.10.7.1 3.10.5 3.10.8 | 3.1.4 3.1.4.2 SR 3.1.4.3 SR |
| A.4 | Provides an explicit statement that requirements governing control rod Operability and control rod alignment must be met in Modes 1 and 2. | 3.10.3 3.10.4 3.10.5 3.10.8 | 3.1.4 APP |
| A.5 | Clarifies that the existing requirements to perform drop time of each control rod "at operating temperature and full flow" are met "with Tave greater than or equal to 500°F and all reactor coolant pumps operating." | 3.10.8 | 3.1.4.3 SR |
| ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.4 | 3.1.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.5 |
| A.3 | Revises nomenclature for Applicability from "reactor is critical or approaching criticality" to "Modes 1 and 2." | 3.10.4.1 | 3.1.5 APP |
| A.4 | Superseded by Amendment 216. | NA | NA |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|----------------------|----------------|
| ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.4 | 3.1.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.6 |
| A.3 | Reorganizes requirements so that ITS LCO 3.1.4, Rod Group Alignment Limits, and ITS LCO 3.1.5, Shutdown Bank Insertion Limits, establish Limiting Conditions for Operation that ensure appropriate Required Actions are initiated if conditions exist that could invalidate the normal control bank insertion limits specified in the COLR. | 3.10.4.3 3.10.7.1 | 3.1.6 |
| A.4 | Superceded by Amendment 216. | NA | NA |
| ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.6 | 3.1.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.7 |
| A.3 | Adds an explicit statement that Separate Condition entry is allowed for each inoperable rod position indicator per group and each demand position indicator per bank. | 3.10.6 | 3.1.7 RA-NOTE |
| A.4 | Deletes explicit statement that the requirements for a misaligned rod must be applied if a rod with an inoperable position indicator is determined to be misaligned because the structure and presentation of requirements in the ITS eliminate the need for cross references. | 3.10.6.3 | 3.1.4 3.1.7 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|----------------------------------|--|
| A.5 | Deletes statement that not more than one rod position indicator (IRPI) channel per group nor two IRPI channels per bank shall be permitted to be inoperable at any time because ITS LCO 3.1.7, Condition B, allows more than one IRPI channel per bank to be inoperable for 24 hours if certain operating restrictions are met. | 3.10.6.2 | 3.1.7 RA-A.1 3.1.7 RA-A.2 3.1.7 RA-B.1 3.1.7 RA-B.2 3.1.7 RA-B.3 3.1.7 RA-B.4 |
| A.6 | Clarifies the Frequency for checking rod position indirectly by core instrumentation whenever a rod position indicator channel is inoperable from "every shift" (defined as "at least twice per calendar day") to once per 12 hours. | 3.10.6.1 T 1-1 | 3.1.7 RA-A.1 |
| ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2 | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.C 3.10 | 3.1.8 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.1.8 |
| A.3 | Clarifies that physics tests performed in Mode 2 do not require an exemption from the requirements of ITS LCO 3.2.1, Heat Flux Hot Channel Factor, ITS LCO 3.2.2, Nuclear Enthalpy Rise Hot Channel Factor, ITS LCO 3.2.3, Axial Flux Difference (AFD), or ITS LCO 3.2.4, Quadrant Power Tilt Ratio (QPTR) because these LCOs are Applicable in Mode 1 only. | 3.10.2.1 3.10.2.4 3.10.3.1 | 3.1.8 3.2.1 3.2.2 3.2.3 3.2.4 |
| A.4 | Maintains an existing allowance for disabling one channel of the nuclear flux power range function so that the instrument can be used to support physics testing. | T 3.5-2, No.2a | 3.1.8 LCO |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|---|
| ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.2 | 3.2.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.2.1 |
| A.3 | Eliminates statement that core power distribution limits do not apply during physics testing because physics testing is permitted in Mode 2 only and core power distribution limits are applicable only in Mode 1 | 3.10.2.1 | 3.2.1 LCO 3.2.2 LCO 3.2.3 LCO 3.2.4 LCO 3.1.8 LCO |
| A.4 | Explains how ITS 3.2.1 maintains the CTS allowance for a return to power for physics testing following a shutdown when thermal limits are not met. | 3.10.2.2.2 | 3.2.1 APP 3.2.1 RA-A.1 3.2.1 RA-B.1 |
| A.5 | Eliminates "following initial core loading" as one of the required SR Frequencies because initial fuel loading was a one time event that has been completed. | 3.10.2.2 | 3.2.1.1 SR |
| A.6 | Separates the CTS Actions for hot channel factors not within limits into the Required Actions for ITS LCO 3.2.2, Nuclear Enthalpy Rise Hot Channel Factor (FN delta H), and ITS LCO 3.2.1, Heat Flux Hot Channel Factor (FQ(Z)). | 3.10.2.2.2 | 3.2.1 3.2.2 |
| A.7 | Superseded by Amendment 216. | NA | NA |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|---|
| A.8 | Clarifies that the requirement that reactor power and high neutron flux trip setpoint are reduced so as not to exceed a fraction of rated value equal to the ratio of the FQ(Z) limit to measured value whenever the FQ(Z) limit is exceeded means that reactor power and high neutron flux trip setpoints must be reduced by 1% for each 1% that FQ(Z) exceeds the limit. | 3.10.2.2.2 | 3.2.1 RA-A.1 3.2.1 RA-A.2 |
| ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (F_{AH}^N) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.2 | 3.2.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.2.2 |
| A.3 | Eliminates statement that core power distribution limits do not apply during physics testing because physics testing is permitted in Mode 2 only and core power distribution limits are applicable only in Mode 1* | 3.10.2.1 | 3.2.1 LCO 3.2.2 LCO 3.2.3 LCO 3.2.4 LCO 3.1.8 LCO |
| A.4 | Separates the CTS Actions for hot channel factors not within limits into the Required Actions for ITS LCO 3.2.2, Nuclear Enthalpy Rise Hot Channel Factor (FN delta H), and ITS LCO 3.2.1, Heat Flux Hot Channel Factor (FQ(Z)). | 3.10.2.2.2 | 3.2.2 LCO 3.2.1 LCO |
| A.5 | Eliminates "following initial core loading" as one of the required SR Frequencies because initial fuel loading was a one time event that has been completed. | 3.10.2.2 | 3.2.2.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|--|---|
| ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.2 | 3.2.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10.2 | 3.2.3 |
| A.3 | Eliminates statement that core power distribution limits do not apply during physics testing because physics testing is permitted in Mode 2 only and core power distribution limits are applicable only in Mode 1 | 3.10.2.4 | 3.2.1 LCO 3.2.2 LCO 3.2.3 LCO 3.2.4 LCO 3.1.8 LCO |
| A.4 | Eliminates cross references between statement of AFD requirements and Actions required if AFD limits are not met. | 3.10.2.4 3.10.2.5 3.10.2.6 3.10.2.7 | 3.2.3 LCO |
| A.5 | Clarifies that within 15 minutes is a reasonable interpretation of the completion time for the CTS requirement that the flux difference shall be returned to its target band immediately. | 3.10.2.5.1 | 3.2.3 RA-A.1 3.2.3 RA-B.1 |
| A.6 | Adds clarification that the AFD is outside the target band when two or more Operable excore channels indicate AFD to be outside the target band. | 3.10.2.5 | 3.2.3 LCO Note 1 |
| A.7 | Superseded by Amendment 216. | NA | NA |
| A.8 | Clarifies existing requirement that a power reduction required as compensatory action for AFD not within limits must be completed even if AFD is within specified limits before power reduction is completed. | 3.10.2.6.1 3.10.2.6.2 | 3.2.3 RA-C.1 |
| A.9 | Eliminates CTS statement that duplicates requirements in ITS LCO 3.0.4. | 3.10.2.6.3 | 3.2.3 LCO 3.0.4 LCO |
| A.10 | Clarifies that requirement to reduce reactor power immediately is met if power reduction is completed within 30 minutes. | 3.10.2.6.1 3.10.2.6.2 | 3.2.3 RA-C.1 |
| A.11 | Clarifies the requirements for monthly calibrations of upper and lower power range detector chambers for axial offset is addressed by ITS LCO 3.3.1, Reactor Protection | 3.11.B T 4.1-1, No.1 | 3.2.3 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-----------------|---|
| ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.10.3 | 3.2.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.10 | 3.2.4 |
| A.3 | Eliminates statement that core power distribution limits do not apply during physics testing because physics testing is permitted in Mode 2 only and core power distribution limits are applicable only in Mode 1 with thermal power greater than or equal to 50% RTP. | 3.10.3.1 | 3.2.1 LCO 3.2.2 LCO 3.2.3 LCO 3.2.4 LCO 3.1.8 LCO |
| A.4 | Changes the presentation of requirements for QPTR Applicability from "when the core is operating above 50% of rated thermal power" to "Mode 1 with thermal power > 50% RTP." | 3.10.3.1 | 3.2.4 APP |
| A.5 | Clarifies that if an excore detector is inoperable, then excore detectors may be used to determine QPTR only if power is less than or equal to 75% RTP. | 1.8 3.10.2.9 | 3.2.4.1 SR 3.2.4.2 SR |
| A.6 | Clarifies that that core flux maps used to verify QPTR do not use incore thimbles. | 3.10.2.9 | 3.2.4.2 SR |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3 - INSTRUMENTATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|---------------------------------|---|
| ITS SECTION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 2.3 3.5 4.1 | 3.3.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 2.3 3.5 4.1 | 3.3.1 |
| A.3 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 1, Manual Reactor Trip. | T 3.5-2, No.1 T 4.1-1, No.42 | T 3.3.1-1 No. 1 |
| A.3.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 1, Manual Reactor Trip. | T 3.5-2, No.1 | T 3.3.1-1 No. 1 T 3.3.1-1 note a |
| A.3.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 1, Manual Reactor Trip. | T 3.5-2, No.1 T 4.1-1, No.42 | 3.3.1 RA-B.1 3.3.1 RA-C.1 T 3.3.1-1 No. 1 |
| A.3.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 1, Manual Reactor Trip. | 3.0.1 T 3.5-2, No.1 | 3.0.3 LCO T 3.3.1-1 No. 1 |
| A.3.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 1, Manual Reactor Trip. | 3.0.1 T 3.5-2, No.1 | 3.0.3 LCO T 3.3.1-1 No. 1 |
| A.3.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 1, Manual Reactor Trip. | T 4.1-1, No.42 | 3.3.1.14 SR T 3.3.1-1 No. 1 |
| A.3.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 1, Manual Reactor Trip. | T 4.1-1, No.42 | 3.3.1.14 SR T 3.3.1-1 No. 1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|---|---|
| A.4 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | 2.3.1.B (1) T 3.5-2, No.2 T 4.1-1, No.1 | T 3.3.1-1 No. 2a |
| A.4.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | T 3.5-2, No.2 | T 3.3.1-1 No. 2a |
| A.4.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | 3.5.3 T 3.5-2, No.2 | 3.3.1 RA-D.1 T 3.3.1-1 No. 2a |
| A.4.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | 1.5 1.8 3.10.2.9 3.5.3 T 3.5-2, No.2 T 3.5-2, note 1 | 3.3.1 RA-D.1 3.2.4.2 SR T 3.3.1-1 No. 2a |
| A.4.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | 3.0.1 T 3.5-2, No.2 | 3.0.3 LCO 3.3.1 RA-D.2 T 3.3.1-1 No. 2a |
| A.4.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | T 4.1-1, No.1 | T 3.3.1-1 No. 2a 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7 SR 3.3.1.11 SR |
| A.4.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 2.a, Power Range Neutron Flux-High. | 2.3.1.B (1) | T 3.3.1-1 No. 2a |
| A.5 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | 2.3.1.A (1) T 3.5-2, No.2 T 4.1-1, No.1 | T 3.3.1-1 No. 2b |
| A.5.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | T 3.5-2, No.2a | T 3.3.1-1 No. 2b |
| A.5.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | 3.5.3 T 3.5-2, No.2 | T 3.3.1-1 No. 2b |

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| A.5.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | 1.5 3.5.3 3.5.4 T 3.5-2, No.2 | 3.3.1 RA-E.1 T 3.3.1-1 No. 2b |
| A.5.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | 3.0.1 T 3.5-2, No.2 | 3.0.3 LCO 3.3.1 RA-E.2 T 3.3.1-1 No. 2b |
| A.5.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | T 4.1-1, No.1 | T 3.3.1-1 No. 2b 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR |
| A.5.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 2.b, Power Range Neutron Flux-Low. | 2.3.1.A (1) | T 3.3.1-1 No. 2b |
| A.6 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | T 3.5-2, No.3 T 4.1-1, No.2 | T 3.3.1-1 No. 3 |
| A.6.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | T 3.5-2, No.3 | T 3.3.1-1 No. 3 |
| A.6.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | 3.5.3 T 3.5-2, No.3 | T 3.3.1-1 No. 3 |
| A.6.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | T 3.5-2, No.3 | T 3.3.1-1 No. 3 3.3.1 RA-F.1 3.3.1 RA-F.2 |
| A.6.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | T 3.5-2, No.3 | T 3.3.1-1 No. 3 3.3.1 RA-G.1 3.3.1 RA-G.2 |
| A.6.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | T 4.1-1, No.2 | T 3.3.1-1 No. 3 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR |
| A.6.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 3, Intermediate Range Neutron Flux. | 2.3 | T 3.3.1-1 No. 3 T 3.3.1-1 No. 2b |

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| A.7 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | T 3.5-2, No.4 T 4.1-1, No.3 | T 3.3.1-1 No. 4 |
| A.7.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | T 3.5-2, No.4 | T 3.3.1-1 No. 4 3.3.1 RA-G.1 |
| A.7.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | 3.5.3 T 3.5-2, No.4 | T 3.3.1-1 No. 4 |
| A.7.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | T 3.5-2, No.4 | T 3.3.1-1 No. 4 3.3.1 RA-H.1 3.3.1 RA-J.1 3.3.1 RA-J.2.1 3.3.1 RA-J.2.2 |
| A.7.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | T 3.5-2, No.4 | T 3.3.1-1 No. 4 3.3.1 RA-I.1 |
| A.7.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | T 4.1-1, No.3 | T 3.3.1-1 No. 4 3.3.1.1 SR 3.3.1.7 SR 3.3.1.8 SR 3.3.1.11 SR |
| A.7.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 4, Source Range Neutron (SRM) Flux. | 2.3 | T 3.3.1-1 No. 4 T 3.3.1-1 No. 2b |
| A.8 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | 2.3.1.B (4) T 3.5-2, No.5 T 4.1-1, No.1 T 4.1-1, No.4 T 4.1-1, No.7 | T 3.3.1-1 No. 5 |
| A.8.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | T 3.5-2, No.5 | T 3.3.1-1 No. 5 |
| A.8.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 5, Overtemperature delta T. | 3.5.3 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |

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| A.8.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 5, Overtemperature delta T. | 1.5 3.5.3 3.5.4 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |
| A.8.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 5, Overtemperature delta T. | 3.0.1 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.2 3.0.3 |
| A.8.E | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | 2.3.1.B (4) T 3.5-2, No.5 T 4.1-1, No.1 T 4.1-1, No.4 T 4.1-1, No.7 | T 3.3.1-1 No. 5 |
| A.8.F | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | T 3.5-2, No.5 | T 3.3.1-1 No. 5 |
| A.9 | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 5, Overtemperature delta T. | 3.5.3 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |
| A.9.A | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 5, Overtemperature delta T. | 1.5 3.5.3 3.5.4 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |
| A.9.B | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 5, Overtemperature delta T. | 3.0.1 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.2 3.0.3 |
| A.9.C | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | 2.3.1.B (4) T 3.5-2, No.5 T 4.1-1, No.1 T 4.1-1, No.4 T 4.1-1, No.7 | T 3.3.1-1 No. 5 |
| A.9.D | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 5, Overtemperature delta T. | T 3.5-2, No.5 | T 3.3.1-1 No. 5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.9.E | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 5, Overtemperature delta T. | 3.5.3 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |
| A.9.F | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 5, Overtemperature delta T. | 1.5 3.5.3 3.5.4 T 3.5-2, No.5 | T 3.3.1-1 No. 5 3.3.1 RA-E.1 |
| A.10 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 2.3.1.B (3) T 3.5-2, No.7 T 4.1-1, No.7 | T 3.3.1-1 No. 7a |
| A.10.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 2.3.2.A T 3.5-2, No.7 | T 3.3.1-1 No. 7a |
| A.10.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 3.5.3 T 3.5-2, No.7 | T 3.3.1-1 No. 7a 3.3.1 RA-K.1 |
| A.10.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 1.5 3.5.3 3.5.4 T 3.5-2, No.7 | T 3.3.1-1 No. 7a 3.3.1 RA-K.1 |
| A.10.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 3.0.1 2.3.2.A T 3.5-2, No.7 | T 3.3.1-1 No. 7a 3.3.1 RA-K.2 3.0.3 LCO |
| A.10.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | T 4.1-1, No.7 | T 3.3.1-1 No. 7a 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.10.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 7.a, Pressurizer Pressure-Low. | 2.3.1.B (3) | T 3.3.1-1 No. 7a |
| A.11 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | 2.3.1.B (2) T 3.5-2, No.8 T 4.1-1, No.7 | T 3.3.1-1 No. 7b |
| A.11.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | T 3.5-2, No.8 | T 3.3.1-1 No. 7b |

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| A.11.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | 3.5.3 T 3.5-2, No.8 | T 3.3.1-1 No. 7b 3.3.1 RA-E.1 |
| A.11.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | 1.5 3.5.3 3.5.4 T 3.5-2, No.8 | T 3.3.1-1 No. 7b 3.3.1 RA-E.1 |
| A.11.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | 3.0.1 T 3.5-2, No.5 T 3.5-2, No.8 | T 3.3.1-1 No. 7b 3.3.1 RA-E.2 3.0.3 LCO |
| A.11.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | T 4.1-1, No.7 | T 3.3.1-1 No. 7b 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.11.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 7.b, Pressurizer Pressure-High. | 2.3.1.B (2) | T 3.3.1-1 No. 7b |
| A.12 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 2.3.1.C (1) T 3.5-2, No.9 T 4.1-1, No.6 | T 3.3.1-1 No. 8 |
| A.12.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 2.3.2.A T 3.5-2, No.9 | T 3.3.1-1 No. 8 |
| A.12.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 3.5.3 T 3.5-2, No.9 | T 3.3.1-1 No. 8 3.3.1 RA-K.1 |
| A.12.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 1.5 3.5.3 3.5.4 T 3.5-2, No.9 | T 3.3.1-1 No. 8 3.3.1 RA-K.1 |
| A.12.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 3.0.1 T 3.5-2, No.7 | T 3.3.1-1 No. 8 3.3.1 RA-K.2 3.0.3 LCO |

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| A.12.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | T 4.1-1, No.7 | T 3.3.1-1 No. 8 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.12.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 8, Pressurizer Water Level-High. | 2.3.1.C (1) | T 3.3.1-1 No. 8 |
| A.13 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 2.3.1.B (6) 2.3.2.A 2.3.2.B T 3.5-2, No.10 T 4.1-1, No.5 | T 3.3.1-1 No. 9 |
| A.13.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 2.3.2.A 2.3.2.B T 3.5-2, No.10 | T 3.3.1-1 No. 9 |
| A.13.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 3.5.3 T 3.5-2, No.10 | T 3.3.1-1 No. 9 3.3.1 RA-K.1 |
| A.13.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 3.5.3 3.5.4 T 3.5-2, No.10 | T 3.3.1-1 No. 9 3.3.1 RA-K.1 |
| A.13.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 3.0.1 2.3.2.A T 3.5-2, No.10 T 3.5-2, No. 7 | T 3.3.1-1 No. 9 3.3.1 RA-K.2 3.0.3 LCO |
| A.13.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | T 4.1-1, No.5 | T 3.3.1-1 No. 9 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.13.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 9, Reactor Coolant Flow-Low. | 2.3.1.B (6) | T 3.3.1-1 No. 9 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.14 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 2.3.2.A 2.3.2.B T 3.5-2, No.13 | T 3.3.1-1 No. 10a |
| A.14.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 2.3.2.B T 3.5-2, No.13 | T 3.3.1-1 No. 10a |
| A.14.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 3.5.3 T 3.5-2, No.10 | T 3.3.1-1 No. 10a 3.3.1 RA-L.1 |
| A.14.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 3.5.3 3.5.4 T 3.5-2, No.13 | T 3.3.1-1 No. 10a T 3.3.1-1 No. 10b 3.3.1 RA-L.1 |
| A.14.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 2.3.2.B 3.0.1 T 3.5-2, No.13 | T 3.3.1-1 No. 10a 3.3.1 RA-L.2 3.0.3 LCO |
| A.14.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | T 4.1-1, No.8 | T 3.3.1-1 No. 10a 3.3.1.14 SR |
| A.14.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 10.a, Reactor Coolant Pump (RCP) Breaker Position-Single Loop. | 2.3 3.5 4.1 | T 3.3.1-1 No. 10a 3.3.1.14 SR |
| A.15 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 2.3.2.A T 3.5-2, No.13 | T 3.3.1-1 No. 10b |
| A.15.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 2.3.2.A 2.3.2.B T 3.5-2, No.13 | T 3.3.1-1 No. 10b T 3.3.1-1 No. 10a |
| A.15.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 3.5.3 T 3.5-2, No.10 | T 3.3.1-1 No. 10b 3.3.1 RA-K.1 |
| A.15.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 3.5.3 3.5.4 T 3.5-2, No.13 | T 3.3.1-1 No. 10b 3.3.1 RA-L.1 |
| A.15.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 2.3.2.A 3.0.1 T 3.5-2, No.13 | T 3.3.1-1 No. 10b 3.3.1 RA-M.2 3.0.3 LCO |

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| A.15.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | T 4.1-1, No.8b | T 3.3.1-1 No. 10b 3.3.1.14 SR |
| A.15.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 10.b, Reactor Coolant Pump (RCP) Breaker Position-Two Loops. | 3.5 4.1 | T 3.3.1-1 No. |
| A.16 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 2.3.1.B(7) 2.3.2.A T 3.5-2, No.12 T 4.1-1, No.8 | T 3.3.1-1 No. 11 T 3.3.1-1 No. 10a T 3.3.1-1 No. 10b |
| A.16.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 2.3.2.A T 3.5-2, No.12 | T 3.3.1-1 No. 11 |
| A.16.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 3.5.3 T 3.5-2, No.12 | T 3.3.1-1 No. 11 3.3.1 RA-K.1 |
| A.16.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 1.5 3.5.3 3.5.4 T 3.5-2, No.12 | T 3.3.1-1 No. 11 3.3.1 RA-K.1 |
| A.16.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 3.0.1 2.3.2.A T 3.5-2, No.12 T 3.5-2, No. 7 | T 3.3.1-1 No. 11 3.3.1 RA-K.2 3.0.3 LCO |
| A.16.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | T 4.1-1, No.8a | T 3.3.1-1 No. 11 3.3.1.9 SR 3.3.1.10 SR |
| A.16.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 11, RCP Undervoltage (6.9 kV bus). | 2.3.1.B (7) | T 3.3.1-1 No. 11 |
| A.17 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 2.3.1.B (6) 2.3.2.A T 3.5-2, No.13 T 4.1-1, No.8 | T 3.3.1-1 No. 12 |
| A.17.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 2.3.2.A T 3.5-2, No.13 | T 3.3.1-1 No. 12 |

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| A.17.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 3.5.3 T 3.5-2, No.13 | T 3.3.1-1 No. 12 3.3.1 RA-K.1 |
| A.17.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 1.5 3.5.3 3.5.4 T 3.5-2, No.13 | T 3.3.1-1 No. 12 3.3.1 RA-K.1 |
| A.17.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 3.0.1 2.3.2.A T 3.5-2, No.7 T 3.5-2, No.13 | T 3.3.1-1 No. 12 3.3.1 RA-K.2 3.0.3 LCO |
| A.17.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | T 4.1-1, No.8b | T 3.3.1-1 No. 12 3.3.1.9 SR 3.3.1.10 SR |
| A.17.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 12, RCP Underfrequency (6.9 kV bus). | 2.3.1.B (6) | T 3.3.1-1 No. 12 |
| A.18 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | 2.3.1.C (2) T 3.5-2, No.11 T 4.1-1, No.11 | T 3.3.1-1 No. 13 |
| A.18.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level Low-Low. | T 3.5-2, No.11 | T 3.3.1-1 No. 13 |
| A.18.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | 3.5.3 T 3.5-2, No.11 | 3.3.1 RA-E.1 T 3.3.1-1 No. 13 |
| A.18.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | 3.5.3 3.5.4 T 3.5-2, No.11 T 3.5-2, Note 1 | T 3.3.1-1 No. 13 3.3.1 RA-E.1 3.3.1 RA-K.1 |
| A.18.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | 3.0.1 T 3.5-2, No.5 T 3.5-2, No.11 | 3.3.1 RA-E.2 T 3.3.1-1 No. 13 3.0.3 LCO |

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| A.18.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | T 4.1-1, No.11 T 4.1-1, No.7 | T 3.3.1-1 No. 13 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.18.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low. | 2.3.1.C (2) | T 3.3.1-1 No. 13 |
| A.19 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | T 3.5-2 | T 3.3.1-1 No. 14 |
| A.19.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | 2.3 3.5 4.1 | T 3.3.1-1 No. 13 T 3.3.1-1 No. 14 |
| A.19.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | 3.5 4.1 | T 3.3.1-1 No. 14 |
| A.19.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | 3.5.4 | T 3.3.1-1 No. 14 3.3.1 RA-E.1 |
| A.19.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | T 3.5-2 | T 3.3.1-1 No. 14 3.3.1 RA-E.2 |
| A.19.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | T 3.5-2 | T 3.3.1-1 No. 14 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.19.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch. | T 3.5-2 | T 3.3.1-1 No. 14 |
| A.20 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | 2.3.2.C T 3.5-2, No.17 T 4.1-1, No.27 | T 3.3.1-1 No. 15 |

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| A.20.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | 2.3.2.C T 3.5-2, No.17 | T 3.3.1-1 No. 15 |
| A.20.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | 3.5.3 T 3.5-2, No.17 | 3.3.1 RA-N.1 T 3.3.1-1 No. 15 |
| A.20.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | 1.5 3.5.3 3.5.4 T 3.5-2, No.17 T 3.5-2, Note2 | T 3.3.1-1 No. 15 3.3.1 RA-N.1 |
| A.20.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | T 3.5-2, No.17 | 3.3.1 RA-N.2 T 3.3.1-1 No. 15 |
| A.20.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | T 4.1-1, No.27 | T 3.3.1-1 No. 15 3.3.1.10 SR 3.3.1.14 SR |
| A.20.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 15, Turbine Trip-Low Auto Stop Oil Pressure. | 2.3.2.C T 3.5-2, No.17 T 4.1-1, No.27 | T 3.3.1-1 No. 15 |
| A.21 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | 4.5.A.1 T 3.5-2, No.18a T 3.5-3, No.6 | T 3.3.1-1 No. 16 |
| A.21.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | T 3.5-2, No.18a | T 3.3.1-1 No. 16 |
| A.21.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | T 3.5-3, No.6 | 3.3.1 RA-L.1 T 3.3.1-1 No. 16 |
| A.21.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | T 3.5-2, No.18a | T 3.3.1-1 No. 16 3.3.1 RA-L.1 |
| A.21.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | T 3.5-2, No.18a | 3.3.1 RA-O.2 T 3.3.1-1 No. 16 3.0.3 LCO |

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| A.21.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | 4.5.A.1 | T 3.3.1-1 No. 16 3.3.1.14 SR |
| A.21.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 16, (Reactor Trip) Safety Injection (SI) Input from ESFAS. | 4.5.A.1 | T 3.3.1-1 No. 16 |
| A.22 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6) Interlock. | T 3.5-2, No.4 T 3.5-2, Note ** | T 3.3.1-1 No. 17a |
| A.22.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6). | T 3.5-2, No.4 T 3.5-2, Note ** | T 3.3.1-1 No. 17a T 3.3.1-1 No. 4 3.3.1 RA-M.1 |
| A.22.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6). | T 3.5-2, No.4 T 3.5-2, Note ** | T 3.3.1-1 No. 3 T 3.3.1-1 No. 4 T 3.3.1-1 No. 17a 3.3.1 RA-Q.1 |
| A.22.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6). | T 3.5-2, No.4 T 3.5-2, Note ** | T 3.3.1-1 No. 17a T 3.3.1-1 No. 4 3.3.1 RA-Q.1 |
| A.22.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6). | T 3.5-2, No.4 T 3.5-2, Note ** | 3.3.1 RA-Q.2 T 3.3.1-1 No. 17a |
| A.22.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6). | T 3.5-2, No.4 T 3.5-2, Note ** | 3.3.1.11 SR 3.3.1.13 SR T 3.3.1-1 No. 17a |
| A.22.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 17.a, Intermediate Range (IRM) Neutron Flux (P-6) Interlock. | T 3.5-2, No.4 T 3.5-2, Note ** | T 3.3.1-1 No. 17a T 3.3.1-1 No. 4 |
| A.23 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 2.3.2.A (1) 2.3.2.A (2) | T 3.3.1-1 No. 17b T 3.3.1-1 No. 17d T 3.3.1-1 No. 17e |
| A.23.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 2.3.2.A (1) 2.3.2.A (2) | T 3.3.1-1 No. 17b |
| A.23.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 3.5.3 | T 3.3.1-1 No. 17b |

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| A.23.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 2.3.2.A (1) 2.3.2.A (2) | 3.3.1 RA-S.1 T 3.3.1-1 No. 17b |
| A.23.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 2.3.2.A | T 3.3.1-1 No. 17b 3.3.1 RA-S.2 |
| A.23.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 3.5 | 3.3.1.11 SR 3.3.1.13 SR T 3.3.1-1 No. 17b |
| A.23.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 17.b, Low Power Reactor Trip Block (P-7) Interlock. | 2.3.2.A | T 3.3.1-1 No. 17b T 3.3.1-1 No. 17d T 3.3.1-1 No. 17e |
| A.24 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c |
| A.24.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c |
| A.24.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | T 3.5-2 No. 2 | T 3.3.1-1 No. 17c T 3.3.1-1 No. 2a |
| A.24.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c 3.3.1 RA-S.1 |
| A.24.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c 3.3.1. RA-S.2 3.0.3 LCO |
| A.24.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c 3.3.1.11 SR 3.3.1.13 SR |
| A.24.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 17.c, Power Range Neutron Flux (P-8) Interlock. | 2.3.2.B 2.3.2.C | T 3.3.1-1 No. 17c |

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| A.25 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | 2.3.2.A (1) | T 3.3.1-1 No. 17d T 3.3.1-1 No. 2b T 3.3.1-1 No. 3 |
| A.25.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | 2.3.2.A (1) | T 3.3.1-1 No. 17d |
| A.25.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | T 3.5-2 No. 2 | T 3.3.1-1 No. 17d T 3.3.1-1 No. 2a |
| A.25.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | 2.3.2.A (1) | 3.3.1 RA-Q.1 T 3.3.1-1 No. 17d |
| A.25.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | 2.3.2.A (1) | 3.3.1 RA-Q.2 T 3.3.1-1 No. 17d |
| A.25.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | T 4.1-1, No.1 | T 3.3.1-1 No. 17d 3.3.1.11 SR 3.3.1.13 SR |
| A.25.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 17.d, Power Range Neutron Flux (P-10) Interlock. | 2.3.2.A (2) | T 3.3.1-1 No. 17d |
| A.26 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (2) T 4.1-1, No.24 | T 3.3.1-1 No. 17e |
| A.26.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (2) | T 3.3.1-1 No. 17e |
| A.26.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (1) | T 3.3.1-1 No. 17e |
| A.26.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (2) T 4.1-1, No.24 | T 3.3.1-1 No. 17e 3.3.1 RA-S.1 |
| A.26.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (2) 3.5.3 T 4.1-1, No.24 | T 3.3.1-1 No. 17e 3.3.1 RA-S.2 3.0.3 LCO |

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| A.26.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | T 4.1-1, No.24 | T 3.3.1-1 No. 17e 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR |
| A.26.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 17.e, Turbine First Stage Pressure (P-7 Input) Interlock. | 2.3.2.A (2) T 4.1-1, No.24 | T 3.3.1-1 No. 17e |
| A.27 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | T 3.5-2, No.19 T 4.1-1, No.43 T 4.1-1, No.44 | T 3.3.1-1 No. 18 |
| A.27.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | T 3.5-2, No.19 | T 3.3.1-1 No. 18 |
| A.27.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-P.1 T 3.3.1-1 No. 18 |
| A.27.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | 3.0.1 3.5.3 1.5 T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-C.2.1 3.3.1 RA-P.1 T 3.3.1-1 No. 18 |
| A.27.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | T 3.5-2, No.19 | 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 18 3.0.3 LCO |
| A.27.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | T 4.1-1, No.43 T 4.1-1, No.44 T 4.1-1, Note*9 | T 3.3.1-1 No. 18 3.3.1.4 SR |
| A.27.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 18, Reactor Trip Breakers. | 3.5 4.1 | T 3.3.1-1 No. 18 |
| A.28 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 3.5-2, No.19 T 4.1-1, No.43 T 4.1-1, No.44 | T 3.3.1-1 No. 19 |

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| A.28.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 3.5-2, No.19 | T 3.3.1-1 No. 19 |
| A.28.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 3.5-2, No.19 | T 3.3.1-1 No. 19 |
| A.28.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 3.5-2, No.19 | 3.3.1 RA-S.1 T 3.3.1-1 No. 19 |
| A.28.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 3.5-2, No.19 | 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 19 3.0.3 LCO |
| A.28.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | T 4.1-1, No.43 T 4.1-1, No.44 T 3.5-2, No.19 | T 3.3.1-1 No. 19 3.3.1.4 SR |
| A.28.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 19, Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms. | 3.5 4.1 | T 3.3.1-1 No. 19 |
| A.29 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | T 3.5-2, No.18 T 4.1-1, No.25 | T 3.3.1-1 No. 20 |
| A.29.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | T 3.5-2, No.18 | 3.3.1 RA-C.1 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 3.3.1 RA-M.1 T 3.3.1-1 No. 20 |
| A.29.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | T 3.5-2, No.18 | 3.3.1 RA-O.1 T 3.3.1-1 No. 20 |
| A.29.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | 1.5 3.5.3 T 3.5-2, No.18 T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-C.2.1 3.3.1 RA-L.1 3.3.1 RA-O.1 T 3.3.1-1 No. 20 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.29.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | 3.0.1 T 3.5-2, No.18 | 3.0.3 LCO 3.3.1 RA-L.2 T 3.3.1-1 No. 20 |
| A.29.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | T 4.1-1, No.25 | T 3.3.1-1 No. 20 3.3.1.5 SR |
| A.29.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.1, Function 20, (RPS) Automatic Trip Logic. | T 4.1-1, No.25 | T 3.3.1-1 No. 20 |
| A.30 | Clarifies that CTS 3.5.2, which specifies that "plant operation shall be permitted to continue in accordance with Tables 3.5-2 through 3.5-4. No more than one channel of a particular protection channel set shall be tested at the same time. By definition, an instrumentation channel failure shall not be regarded as a channel being tested," is maintained by the combination of requirements in ITS Table 3.3.1-1 and ITS 3.3.1, Required Actions, including notes that address testing. | 3.5.2 T 3.5-2 T 3.5-3 T 3.5-4 | 3.3.1 |
| A.31 | Clarifies that a channel in bypass for testing is inoperable and that the actions for an inoperable channel apply. | 3.5.3 | 3.3.1 RA-D.1 Note 3.3.1 RA-E.1 Note 3.3.1 RA-H.1 Note 3.3.1 RA-I.1 Note 3.3.1 RA-J.1 Note 3.3.1 RA-K.1 Note 3.3.1 RA-L.1 Note |
| A.32 | Clarifies that ITS 3.3.1 requirements in Table 3.3.1-1 and associated Required Actions are constructed to allow separate condition entry for each function listed in Table 3.3.1-1. | T 3.5-2, No.10 T 3.5-2, No.11 | T 3.3.1-1 3.3.1 RA-Note |
| A.33 | Clarifies how ITS combination of requirements for number of Operable channels and that an inoperable channel is placed in trip maintains the CTS requirement for minimum number of Operable channels and minimum degree of redundancy with no explicit requirement that an inoperable channel is placed in trip. | 1.5 3.5.3 T 3.5-2 T 3.5-3 T 3.5-4 | 3.3.1 LCO 3.3.2 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.34 | Superseded by Amendment 225. | NA | NA |
| A.35 | Not Used. | NA | NA |
| ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.5 4.1 | 3.3.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.5 4.1 | 3.3.2 |
| A.3 | ITS 3.3.2. Function 1.a, Safety Injection-Manual Initiation. | T 3.5-3, No.1a | T 3.3.2-1 No. 1a |
| A.3.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | 3.5.1 T 3.5-3, No.1a | 3.3.2 APP T 3.3.2-1 No. 1a |
| A.3.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | T 3.5-3, No.1a | 3.3.2 RA-B.1 T 3.3.2-1 No. 1a |
| A.3.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | T 3.5-3, No.1a | 3.3.2 RA-B.1 T 3.3.2-1 No. 1a |
| A.3.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | T 3.5-3, No.1a | 3.3.2 RA-B.2.1 3.3.2 RA-B.2.2 T 3.3.2-1 No. 1a |
| A.3.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | 4.5.A.1.A T 4.1-1 | T 3.3.2-1 No. 1a 3.3.2.6 SR |
| A.3.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.a, Safety Injection-Manual Initiation. | 4.5.A.1.a T 3.5-3, No.1a | 3.3.2.6 SR T 3.3.2-1 No. 1a |
| A.4 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 1b |
| A.4.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 1b |
| A.4.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.5.1 T 3.5-3, No.6 | T 3.3.2-1 No. 1b |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.4.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable train for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-C.1 T 3.3.2-1 No. 1b |
| A.4.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.0.1 3.5.1 T 3.5-3, No.6 T 3.5-3, Note# | 3.0.3 LCO T 3.3.2-1 No. 1b 3.3.2 RA-C.2.1 3.3.2 RA-C.2.2 |
| A.4.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.5.1 4.5.A.1.a T 3.5-2, Note # T 4.1-1, No.26 | T 3.3.2-1 No. 1b 3.3.2 RA-C.1 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.4.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.b, Safety Injection-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 1b |
| A.5 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | T 3.5-1, No.1 T 3.5-3, No.1b T 4.1-1, No.18b | T 3.3.2-1 No. 1c |
| A.5.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | 3.5.1 T 3.5-1, No.1 T 3.5-3, No.1b | T 3.3.2-1 No. 1c |
| A.5.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | T 3.5-1, No.1 T 3.5-3, No.1b | T 3.3.2-1 No. 1c 3.3.2 RA-D.1 |
| A.5.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | 3.5.3 3.5.4 T 3.5-1, No.1 T 3.5-3, No.1b | 3.3.2 RA-D.1 T 3.3.2-1 No. 1c |
| A.5.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | 3.0.1 T 3.5-1, No.1 T 3.5-3, No.1b T 4.1-1, No.18b | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 1c |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.5.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | T 3.5-1, No.1 T 4.1-1, No.18b | T 3.3.2-1 No. 1c 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.5.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High. | T 3.5-1, No.1 | T 3.3.2-1 No. 1c |
| A.6 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | T 3.5-1, No.3 T 3.5-3, No.1d T 4.1-1, No.7 | T 3.3.2-1 No. 1d |
| A.6.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | T 3.5-1, No.3 T 3.5-3, No.1d | T 3.3.2-1 No. 1d |
| A.6.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | T 3.5-3 | T 3.3.2-1 No. 1d |
| A.6.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | 3.5.3 3.5.4 T 3.5-3, No.1d | 3.3.2 RA-D.1 T 3.3.2-1 No. 1d |
| A.6.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | 3.0.1 T 3.5-3, No.1d | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 1d |
| A.6.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | T 4.1-1, No.7 | T 3.3.2-1 No. 1d 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.6.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure – Low. | T 3.5-1, No.3 | T 3.3.2-1 No. 1d |
| A.7 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | T 3.3.2-1 No. 1e |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.7.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | T 3.3.2-1 No. 1e |
| A.7.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | T 3.3.2-1 No. 1e |
| A.7.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | 3.5.3 T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | 3.3.2 RA-D.1 T 3.3.2-1 No. 1e |
| A.7.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | 3.0.1 T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 1e |
| A.7.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | T 3.5-1, No.4 T 3.5-3, No.1c T 4.1-1, No.23 | T 3.3.2-1 No. 1e 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.7.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.e, Safety Injection-High Differential Pressure Between Steam Lines. | T 3.5-1, No.4 | T 3.3.2-1 No. 1e |
| A.8 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.4 T 4.1-1, No.24 | T 3.3.2-1 No. 1f |
| A.8.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 1f |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.8.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 1f |
| A.8.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | 3.3.2 RA-D.1 T 3.3.2-1 No. 1f |
| A.8.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave – Low. | 3.0.1 T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 1f |
| A.8.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 1f 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.8.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.f, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 1d T 3.3.2-1 No. 1e T 3.3.2-1 No. 1f T 3.3.2-1 No. 4d T 3.3.2-1 No. 4e |
| A.9 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 1g |
| A.9.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 1g |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|--|---|
| A.9.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 1g |
| A.9.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | 3.5.3 T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | 3.3.2 RA-D.1 T 3.3.2-1 No. 1g |
| A.9.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | 3.0.1 T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 1g |
| A.9.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-3, No.1e T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 1g 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.9.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 1.g, Safety Injection - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 | T 3.3.2-1 No. 1g |
| A.10 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | T 3.5-3, No.2a | T 3.3.2-1 No. 2a |
| A.10.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | 3.5.1 T 3.5-3, No.2a | 3.3.2 APP T 3.3.2-1 No. 2a |
| A.10.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | T 3.5-3, No.2a | 3.3.2 RA-B.1 T 3.3.2-1 No. 2a |
| A.10.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | T 3.5-3, No.2a | 3.3.2 RA-B.1 T 3.3.2-1 No. 2a |

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| A.10.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | T 3.5-3, No.2a | 3.3.2 RA-B.2.1 3.3.2 RA-B.2.2 T 3.3.2-1 No. 2a |
| A.10.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | 4.5.B.1 T 3.5-3, No.2a | 3.3.2.6 SR T 3.3.2-1 No. 2a |
| A.10.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 2.a, Containment Spray-Manual Initiation. | 1.0 T 3.5-3, No.2a | 3.3.2.6 SR T 3.3.2-1 No. 2a |
| A.11 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 2b |
| A.11.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 2b |
| A.11.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 | T 3.3.2-1 No. 2b 3.3.2 RA-C.1 |
| A.11.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-C.1 T 3.3.2-1 No. 2b |
| A.11.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | 3.0.1 3.5.1 T 3.5-3, No.6 | 3.0.3 LCO T 3.3.2-1 No. 2b 3.3.2 RA-C.2.1 3.3.2 RA-C.2.2 |
| A.11.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | 3.5.1 4.5.B.1 T 3.5-2, Note # T 4.1-1, No.26 | T 3.3.2-1 No. 2b 3.3.2 RA-C.1 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.11.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 2.b, Containment Spray - Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 2b |
| A.12 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | T 3.5-1, No.2 T 3.5-3, No.2b T 4.1-1, No.18a | T 3.3.2-1 No. 2c |

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| A.12.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | 3.5.1 T 3.5-1, No.2 T 3.5-3, No.2b | T 3.3.2-1 No. 2c |
| A.12.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | 3.5.3 T 3.5-3, No.2b | 3.3.2 RA-E.1 T 3.3.2-1 No. 2c |
| A.12.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | 3.5.3 3.5.4 T 3.5-3, No.2b | 3.3.2 RA-E.1 T 3.3.2-1 No. 2c |
| A.12.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | T 3.5-4 T 3.5-3, No.2b | 3.0.3 LCO 3.3.2 RA-E.2.1 3.3.2 RA-E.2.2 T 3.3.2-1 No. 2c |
| A.12.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | T 4.1-1, No.18a | T 3.3.2-1 No. 2c 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.12.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High). | T 3.5-1, No.2 | T 3.3.2-1 No. 2c |
| A.13 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | T 3.5-4, No.1c | T 3.3.2-1 No. 3a1 |
| A.13.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | 3.5.1 T 3.5-4, No.1c | 3.3.2 APP T 3.3.2-1 No. 3a1 |
| A.13.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.1 T 3.3.2-1 No. 3a1 |
| A.13.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.1 T 3.3.2-1 No. 3a1 |
| A.13.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.2.1 3.3.2 RA-B.2.2 T 3.3.2-1 No. 3a1 |

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| A.13.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | T 3.5-4, No.1c T 4.1-1 T 4.1-3, No.5 | T 3.3.2-1 No. 3a1 3.3.2.6 SR |
| A.13.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 3.a.(1), Containment Phase A Isolation-Manual Initiation. | 1.0 T 3.5-4, No.1c | 3.3.2.6 SR T 3.3.2-1 No. 3a1 |
| A.14 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3a2 |
| A.14.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3a2 |
| A.14.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 | T 3.3.2-1 No. 3a2 3.3.2 RA-C.1 |
| A.14.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-C.1 T 3.3.2-1 No. 3a2 |
| A.14.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | 3.0.1 3.5.1 T 3.5-3, No.6 T 3.5-3, Note # | 3.0.3 LCO T 3.3.2-1 No. 3a2 3.3.2 RA-C.2.1 3.3.2 RA-C.2.2 |
| A.14.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-2, Note # T 4.1-1, No.26 T 4.1-3, No.5 | T 3.3.2-1 No. 3a2 3.3.2 RA-C.1 Note 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.14.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 3.a.(2), Containment Phase A Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3a2 |

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| A.15 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.a.(3), Containment Phase A Isolation - Safety Injection. | T 3.5-4, No.1a T 3.5-3, No.1 | T 3.3.2-1 No. 3a3 3.3.2 RA-D.1 |
| A.16 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | T 3.5-4, No.1c | T 3.3.2-1 No. 3b1 |
| A.16.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | 3.5.1 T 3.5-4, No.1c | 3.3.2 APP T 3.3.2-1 No. 3b1 |
| A.16.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.1 T 3.3.2-1 No. 3b1 |
| A.16.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.1 T 3.3.2-1 No. 3b1 |
| A.16.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | T 3.5-4, No.1c | 3.3.2 RA-B.2.1 3.3.2 RA-B.2.2 T 3.3.2-1 No. 3b1 |
| A.16.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | T 3.5-4, No.3 | T 3.3.2-1 No. 3b1 3.3.2.6 SR |
| A.16.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 3.b.(1), Containment Phase B Isolation-Manual Initiation. | 1.0 T 3.5-4, No.1c | 3.3.2.6 SR T 3.3.2-1 No. 3b1 |
| A.17 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3b2 |
| A.17.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3b2 |
| A.17.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 | T 3.3.2-1 No. 3b2 3.3.2 RA-C.1 |
| A.17.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-C.1 T 3.3.2-1 No. 3b2 |

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| A.17.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | 3.0.1 T 3.5-3, No.6 T 3.5-3, Note # | 3.0.3 LCO T 3.3.2-1 No. 3b2 3.3.2 RA-C.2.1 3.3.2 RA-C.2.2 |
| A.17.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-2, Note # T 4.1-1, No.26 T 4.1-3, No.5 | T 3.3.2-1 No. 3b2 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.17.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 3.b.(2), Containment Phase B Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 3b2 |
| A.18 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | T 3.5-1, No.2 T 3.5-4, No.1b T 4.1-1, No.18a | T 3.3.2-1 No. 3b3 |
| A.18.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | 3.5.1 T 3.5-4 | T 3.3.2-1 No. 3b3 |
| A.18.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | T 3.5-3 | 3.3.2 RA-E.1 T 3.3.2-1 No. 3b3 |
| A.18.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | T 3.5-4, No.1b T 3.5-3, No.2 | 3.3.2 RA-E.1 T 3.3.2-1 No. 3b3 |
| A.18.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | 3.0.1 T 3.5-4, No.1b | 3.0.3 LCO 3.3.2 RA-E.2.1 3.3.2 RA-E.2.2 T 3.3.2-1 No. 3b3 |
| A.18.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | T 4.1-1, No.18a | T 3.3.2-1 No. 3b3 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |

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| A.18.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High). | T 3.5-1, No.2 | T 3.3.2-1 No. 3b3 |
| A.19 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | T 3.5-4, No.2c | T 3.3.2-1 No. 4a |
| A.19.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | 3.5.1 T 3.5-4, No.2c | 3.3.2 App T 3.3.2-1 No. 4a |
| A.19.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | T 3.5-4, No.1c T 3.5-4, No.2c | 3.3.2 RA-F.1 T 3.3.2-1 No. 4a |
| A.19.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | T 3.5-4, No.2c | 3.3.2 RA-F.1 T 3.3.2-1 No. 4a |
| A.19.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | T 3.5-4, No.2c | 3.3.2 RA-F.2.1 3.3.2 RA-F.2.2 T 3.3.2-1 No. 4a |
| A.19.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | 4.7 T 4.1-1 | 3.3.2.6 SR T 3.3.2-1 No. 4a |
| A.19.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 4.a, Steam Line Isolation-Manual Initiation. | T 3.5-4, No.2c | 3.3.2.6 SR T 3.3.2-1 No. 4a |
| A.20 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 4b |
| A.20.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 4b |
| A.20.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 | T 3.3.2-1 No. 4b |
| A.20.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-G.1 T 3.3.2-1 No. 4b |
| A.20.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | 3.0.1 T 3.5-3, No.6 T 3.5-3, Note # | T 3.3.2-1 No. 4b |

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| A.20.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | 4.7 T 3.5-3, Note # T 4.1-1, No.26 | T 3.3.2-1 No. 4b 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.20.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 4b |
| A.21 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | T 3.5-1, No.2 T 3.5-4, No.2b T 4.1-1, No.18a | T 3.3.2-1 No. 4c |
| A.21.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | 3.5.1 T 3.5-1, No.2 T 3.5-4, No.2b | T 3.3.2-1 No. 4c |
| A.21.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | T 3.5-3 T 3.5-4, No.2b | 3.3.2 RA-E.1 T 3.3.2-1 No. 4c |
| A.21.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | T 3.5-4, No.2b T 3.5-4, No.1b | 3.3.2 RA-E.1 T 3.3.2-1 No. 4c |
| A.21.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | 3.0.1 T 3.5-3 T 3.5-4, No.2b | 3.0.3 LCO 3.3.2 RA-E.2.1 3.3.2 RA-E.2.2 T 3.3.2-1 No. 4c |
| A.21.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | T 4.1-1, No.18a | T 3.3.2-1 No. 4c 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.21.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High). | T 3.5-1, No.2 T 3.5-4, No.2b T 4.1-1, No.18a | T 3.3.2-1 No. 4c |

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| A.22 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.4 T 4.1-1, No.24 | T 3.3.2-1 No. 4d |
| A.22.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | 3.5.1 T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 4d |
| A.22.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 4d 3.3.2 RA-D.1 |
| A.22.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | 3.5.3 3.5.4 T 3.5-3, No.1e T 3.5-4, No.2a | 3.3.2 RA-D.1 T 3.3.2-1 No. 4d |
| A.22.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.24 T 4.1-1, No.4 | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 4d |
| A.22.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 4d 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.22.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 4.d, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low. | T 3.5-1, No.5 | T 3.3.2-1 No. 1d T 3.3.2-1 No. 1e T 3.3.2-1 No. 4d T 3.3.2-1 No. 4e |

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| A.23 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 4e |
| A.23.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 4e |
| A.23.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 4e |
| A.23.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | 3.5.3 T 3.5-3, No.1e T 3.5-4, No.2a | 3.3.2 RA-D.1 3.3.2 RA-E.1 T 3.3.2-1 No. 4e |
| A.23.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | 3.0.1 T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.23 T 4.1-1, No.24 | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 4e |
| A.23.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 4.1-1, No.23 T 4.1-1, No.24 | T 3.3.2-1 No. 4e 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.23.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 4.e, Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. | T 3.5-1, No.5 T 3.5-4, No.2a T 4.1-1, No.23 T 4.1-1, No.24 T 4.1-1, No.4 | T 3.3.2-1 No. 1d T 3.3.2-1 No. 1e T 3.3.2-1 No. 4d T 3.3.2-1 No. 4e |
| A.24 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 5a |

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| A.24.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 5a |
| A.24.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 | T 3.3.2-1 No. 5a 3.3.2 RA-C.1 |
| A.24.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note # | 3.3.2 RA-C.1 Note 3.3.2 RA-G.1 T 3.3.2-1 No. 5a |
| A.24.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | 3.0.1 T 3.5-3, No.6 T 3.5-3, Note # | 3.0.3 LCO T 3.3.2-1 No. 5a 3.3.2 RA-G.2.1 3.3.2 RA-G.2.2 |
| A.24.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | T 3.5-2, Note # T 4.1-1, No.26 | T 3.3.2-1 No. 5a 3.3.2 RA-G.1 Note 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |
| A.24.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 5a |
| A.25 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | 3.5 4.1 | T 3.3.2-1 No. 5b |
| A.25.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | 3.5 4.1 | T 3.3.2-1 No. 5b |
| A.25.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | 3.5 4.1 | T 3.3.2-1 No. 5b 3.3.2 RA-D.1 |
| A.25.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | 3.5 | T 3.3.2-1 No. 5b 3.3.2 RA-D.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.25.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | T 4.1-1, No.11 | T 3.3.2-1 No. 5b 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 |
| A.25.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | T 4.1-1, No.11 | T 3.3.2-1 No. 5b 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.25.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Level (High-High). | 3.5 4.1 | T 3.3.2-1 No. 5b |
| A.26 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 5.c, Feedwater Isolation - Safety Injection. | T 3.5-4, No.3a T 3.5-3, No.1 | T 3.3.2-1 No. 5c T 3.3.2-1 No. 5a |
| A.27 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 3.5.1 | T 3.3.2-1 No. 6a |
| A.27.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 3.5.1 T 3.5-3, No.4 | T 3.3.2-1 No. 6a |
| A.27.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 3.5.1 T 3.5-3, No.6 | T 3.3.2-1 No. 6a |
| A.27.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | T 3.5-3, No.6 T 3.5-3, Note# | 3.3.2 RA-C.1 |
| A.27.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 3.0.1 3.5.1 T 3.5-3, No.6 | 3.0.3 LCO T 3.3.2-1 No. 6a 3.3.2 RA-G.2.1 3.3.2 RA-G.2.2 |
| A.27.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 4.8.A.1 T 4.1-1, No.26 T 4.1-1, No.30b T 3.5-3, Note# | T 3.3.2-1 No. 4b 3.3.2 RA-G.1 Note 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.27.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays. | 3.5 | T 3.3.2-1 No. 6a |
| A.28 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | T 3.5-1, No.6 T 3.5-3, No.4a T 4.1-1, No.11 | T 3.3.2-1 No. 6b |
| A.28.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | T 3.5-1, No.6 T 3.5-3, No.4a T 4.1-1, No.30a | T 3.3.2-1 No. 6b |
| A.28.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | T 3.5-1, No.6 T 3.5-3, No.4a T 4.1-1, No.30a | T 3.3.2-1 No. 6b |
| A.28.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | 3.5.3 T 3.5-1, No.6 T 3.5-3, No.4a T 4.1-1, No.30a | 3.3.2 RA-D.1 T 3.3.2-1 No. 6b |
| A.28.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | 3.0.1 T 3.5-1, No.6 T 3.5-3, No.4a T 4.1-1, No.30a | 3.0.3 LCO 3.3.2 RA-D.2.1 3.3.2 RA-D.2.2 T 3.3.2-1 No. 6b |
| A.28.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | T 4.1-1, No.30a | T 3.3.2-1 No. 6b 3.3.2.1 SR SR 3.3.2.7 |
| A.28.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 6.b, Auxiliary Feedwater - SG Water Level - low-low. | T 3.5-1, No.6 | T 3.3.2-1 No. 6b |
| A.29 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 6.c, Auxiliary Feedwater - Safety Injection. | T 3.5-3, No.4b T 3.5-3, No.1 | T 3.3.2-1 No. 6c T 3.3.2-1 No. 6a |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|--|--|
| A.30 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 3.5-1, No.7 T 3.5-3, No.4c T 4.1-1, No.30c | T 3.3.2-1 No. 6d |
| A.30.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | 3.5.1 T 3.5-3, No.4c | T 3.3.2-1 No. 6d |
| A.30.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 3.5-1, No.7 T 3.5-3, No.4c | T 3.3.2-1 No. 6d |
| A.30.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 3.5-1, No.7 T 3.5-3, No.4c T 4.1-1, No.30c | T 3.3.2-1 No. 6d 3.3.2 RA-F.1 |
| A.30.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 3.5-1, No.7 T 3.5-3, No.4c T 4.1-1, No.30c | T 3.3.2-1 No. 6d 3.3.2 RA-F.2.1 3.3.2 RA-F.2.2 |
| A.30.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 4.1-1, No.30c | T 3.3.2-1 No. 6d 3.3.2.6 SR 3.3.2.7 SR |
| A.30.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 6.d, Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A). | T 3.5-1, No.7 T 3.5-3, No.4c | T 3.3.2-1 No. 6d |
| A.31 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3, No.4d T 4.1-1, No.30d | T 3.3.2-1 No. 6e |
| A.31.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3, No.4d T 4.1-1, No.30d | T 3.3.2-1 No. 6e |
| A.31.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3, No.4d T 4.1-1, No.30d | T 3.3.2-1 No. 6e |
| A.31.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3, No.4d T 4.1-1, No.30d | T 3.3.2-1 No. 6e 3.3.2 RA-H.1 3.3.2 RA-H.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.31.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3, No.4d | 3.3.2 RA-H.1.2 3.3.2 RA-H.2.2 |
| A.31.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 4.1-1, No.30d | 3.3.2.6 SR 3.3.2.7 SR |
| A.31.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.2, Function 6.e, Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump. | T 3.5-3 | T 3.3.2-1 No. 6e |
| A.32 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.2, Function 7, ESFAS Interlock - Pressurizer Pressure. | T 3.5-3, No.1d T 3.5-3, No.1d* T 4.1-1, No.7 | T 3.3.2-1 No. 7 T 3.3.2-1 No. 1d 3.3.2 RA-I.1 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| A.33 | Clarifies that in addition to the global statement ESFAS functions must be Operable when the plant is not in cold shutdown condition, CTS also provides an explicitly stated or implied Applicability requirement for each of the ESFAS functions and that the Applicability for each ESFAS function is maintained in ITS 3.3.2, Table 3.3.2-1. | 3.5.1 | T 3.3.2-1 |
| A.34 | Clarifies that CTS 3.5.2, which specifies that "plant operation shall be permitted to continue in accordance with Tables 3.5-2 through 3.5-4. No more than one channel of a particular protection channel set shall be tested at the same time. By definition, an instrumentation channel failure shall not be regarded as a channel being tested," is maintained by the combination of requirements in ITS Table 3.3.2-1 and ITS 3.3.2, Required Actions, including notes that address testing. | 3.5.2 T 3.5-2 T 3.5-3 T 3.5-4 | 3.3.2 |
| A.35 | Clarifies that a channel in bypass for testing is inoperable and that the actions for an inoperable channel apply. | 3.5.3 | 3.3.2 RA-C.1 3.3.2 RA-D.1 3.3.2 RA-E.1 3.3.2 RA-G.1 |
| A.36 | Clarifies that ITS 3.3.2 requirements in Table 3.3.2-1 and associated Required Actions are constructed to allow separate condition entry for each function listed in Table 3.3.2-1. | 3.5.3 | 3.3.2 RA-Note |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------------------------|--|
| A.37 | Clarifies how ITS combination of requirements for number of Operable channels and that an inoperable channel is placed in trip maintains the CTS requirement for minimum number of Operable channels and minimum degree of redundancy with no explicit requirement that an inoperable channel is placed in trip. | 1.5 T 3.5-2 T 3.5-3 T 3.5-4 | 3.3.2 3.3.2 RA-A.1 |
| A.38 | Superseded by Amendment 225. | NA | NA |
| A.39 | Clarifies that CTS Amendment 212, dated November 30, 2000, established explicit requirements for ESFAS Automatic Actuation Logic and that these requirements are maintained in ITS LCO 3.3.2. | T 3.5-3, No.6 T 3.5-3, Note# | 3.3.2, Function 1b 3.3.2, Function 2b 3.3.2, Function 3a2 3.3.2, Function 3b2 3.3.2, Function 4b 3.3.2, Function 5a 3.3.2, Function 6a |
| A.40 | Clarifies how ITS combination of requirements for number of Operable channels and that an inoperable channel is placed in trip maintains the CTS requirement for minimum number of Operable channels and minimum degree of redundancy with no explicit requirement that an inoperable channel is placed in trip. | T 3.5-2 T 3.5-3 T 3.5-4 1.5 | 3.3.2 |
| ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.5 4.1 | 3.3.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.5 4.1 | 3.3.3 |
| A.3 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 1, RCS Hot Leg Temperature (wide range) which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.4 | 3.3.3, Function 1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|------------------------------------|---|
| A.4 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 2, RCS Cold Leg Temperature (wide range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.4 | 3.3.3, Function 2 |
| A.5 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 3, RCS Pressure (wide range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | 3.5 4.1 | 3.3.3, Function 3 |
| A.6 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 4, Reactor Vessel Level Indication System, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | 3.5 4.1 | 3.3.3, Function 4 |
| A.7 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 5, Containment Sump Water Level (Recirculation Sump), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.21a T 4.1-1, No.21b | 3.3.3, Function 5 |
| A.8 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 6, Containment Water Level (Containment Sump), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.21a T 4.1-1, No.21b | 3.3.3, Function 6 |
| A.9 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 7, Containment Pressure (narrow range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.18b | 3.3.3, Function 7 |
| A.10 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 8, Containment Pressure (high range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. Changes the name of this function from Wide Range Containment Pressure Monitor Containment Pressure (High Range) to more closely match design documents and control room labeling. | T 3.5-5, No.7 T 4.1-1, No. 18c | 3.3.3, Function 8 3.3.3 RA-E.1 3.3.3 RA-E.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|---|--|
| A.11 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 9, Containment Area Radiation (high range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 3.5-5, No.10 T 4.1-1, No.40 | 3.3.3, Function 9 3.3.3 RA-A.1 3.3.3.1 SR 3.3.3.2 SR 5.6.6 |
| A.12 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 10, Containment Hydrogen Monitors, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 3.5-5, No.11 T 4.1-1, No.41 T 3.5-5, Action3 | 3.3.3, Function 10 3.3.3 RA-A.1 |
| A.13 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 11, Pressurizer Level, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 3.5-5, No.1 T 4.1-1, No.6 | 3.3.3, Function 11 3.3.3 RA-A.1 3.3.3.1 SR 5.6.6 |
| A.14 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 12, SG Water Level (narrow range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.11 | 3.3.3, Function 12 |
| A.15 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 14, Condensate Storage Tank Level, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | 3.5 | 3.3.3, Function 14 |
| A.16 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Functions 15 through 18, Core Exit Temperature (CET) for core quadrants 1 through 4, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | 3.5 4.1 | 3.3.3, Function 15 3.3.3, Function 16 3.3.3, Function 17 3.3.3, Function 18 |
| A.17 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 19, Auxiliary Feedwater Flow, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 3.5-5, No.6 T 3.5-5, Note***** T 4.1-1, No.35 | 3.3.3, Function 19 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
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| A.18 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 20, Steam Line Pressure, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.23 | 3.3.3, Function 20 |
| A.19 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 20, Steam Line Pressure, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 3.5-5, No.2 T 3.5-5, Action1 T 4.1-1, No.31 | 3.3.3, Function 21 |
| A.20 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 22, RWST Level, which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | T 4.1-1, No.15 3.3.A.1.k | 3.3.3, Function 22 3.3.3.1 SR 3.3.5.4 SR |
| A.21 | Superseded by TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints." | NA | NA |
| A.22 | Provides clarification that Separate Condition entry is allowed for each inoperable Post Accident Monitoring Function. | 3.5 4.1 | 3.3.3 RA-Note 1.3 |
| A.23 | Clarifies that performing a Channel Check more frequently than is necessary to satisfy PAM Operability requirements has no affect on instrument Operability. | 3.5 | 3.3.3.1 SR |
| A.24 | Adopts NUREG-1431 presentation and organization for the Operability, allowable out of service time and surveillance testing for ITS 3.3.3, Function 13, Steam Generator Level (wide range), which is identified as a Type A, Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation. | 3.5 | 3.3.3, Function 13 |
| ITS SPECIFICATION 3.3.4 - REMOTE SHUTDOWN | | | |
| | NONE | | |
| ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.5 4.1 | 3.3.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.5 4.1 | 3.3.5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|---|--|
| A.3 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | T 3.5-1, No.8a T 3.5-3, No.3a T 4.1-1, No.29a | 3.3.5 |
| A.3.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | 3.5.1 T 3.5-1, No.8a T 3.5-3, No.3a | 3.3.5 3.5.5 3.8.2 |
| A.3.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | T 3.5-3, No.3a | 3.3.5 |
| A.3.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | 3.5.3 T 3.5-3, No.3a | 3.3.5 RA-F.1 |
| A.3.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | 3.5.3 T 3.5-3, No.3a | 3.3.5 3.3.5 RA-C.1 |
| A.3.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | T 4.1-1, No.29a | 3.3.5.3 SR 3.3.5.4 SR 3.3.5.5 SR |
| A.3.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.5, 480 V Bus Undervoltage Function - LOP DG Start Instrumentation. | T 3.5-1, No.8a T 4.1-1, No.29a | 3.3.5 |
| A.4 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | T 3.5-1, No.8b T 3.5-3, No.3b T 4.1-1, No.29b | 3.3.5 |
| A.4.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | 3.5.1 T 3.5-3, Note 3 | 3.3.5 |
| A.4.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | T 3.5-3, No.3b T 3.5-3, Note3 | 3.3.5 |
| A.4.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel on one or more buses for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | 3.5.3 T 3.5-3, No.3b T 3.5-3, Note 3 | 3.3.5 RA-G.1 3.3.5 RA-H.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|---|--|
| A.4.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | T 3.5-3, No.3b T 3.5-3, Note3 | 3.3.5 RA-F.1 3.3.5 RA-G.1 3.3.5 RA-H.1 |
| A.4.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | T 4.1-1, No.29b | 3.3.5.1 SR 3.3.5.2 SR 3.3.5.5 SR |
| A.4.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.5, 480 V Bus Degraded Voltage Function - LOP DG Start Instrumentation. | T 3.5-1, No.8b T 3.5-3, No.3a | 3.3.5 |
| A.5 | Clarifies how ITS combination of requirements for number of Operable channels and that an inoperable channel is placed in trip maintains the CTS requirement for minimum number of Operable channels and minimum degree of redundancy with no explicit requirement that an inoperable channel is placed in trip. | 1.5 T 3.5-1 T 3.5-3 | 3.3.2 3.3.5 RA-A.1 3.3.5 RA-B.1 |
| A.6 | Superceded by Amendment 225. | NA | NA |
| A.7 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | T 3.5-1, No. 7 T 3.5-3, No. 4.c T 4.1-1, No. 30.c | 3.3.5 |
| A.7.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | 3.5.1 T 3.5-3 | 3.3.5 |
| A.7.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | T 3.5-3, No. 4.c | 3.3.5 LCO |
| A.7.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | T 3.5-3 | 3.3.5 |
| A.7.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | T 3.5-3, No.4c | 3.3.5 |
| A.7.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | T 4.1-1, No. 30c | 3.3.5.3 SR 3.3.5.4 SR 3.3.5.5 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|--------------------------------------|--|
| A.7.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation. | 3.5-1, No. 7 3.5-3, No. 4c | 3.3.5 |
| ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | T 3.5-4, No.4a 3.1.F.1 3.8.A.1 | 3.3.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.F 3.8.A.1 T 3.5-4, No.4a | 3.3.6 |
| A.3 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | T 3.5-4, No.4a | T 3.3.6-1, No. 1 |
| A.3.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | T 3.5-4, No.4a 3.1.F.1 3.8.A.1 | 3.3.6 LCO |
| A.3.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | T 3.5-3 | 3.3.6 RA-A.1 |
| A.3.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable train for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | 3.1.F.1.b.(6) 3.1.F.1.c | 3.3.6 RA-B.1 |
| A.3.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | 3.1.F T 3.5-3, No.4a | 3.3.6 RA-B.1 |
| A.3.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | T 4.1-1, No. 26 T 4.1-3, No. 5 | 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5 SR |
| A.3.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | 3.1.F.1 3.8.A.1 T 3.5-4, No.4a | T 3.3.6-1, No. 1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|--------------------------------------|--|
| A.3.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.6, Function 1, Containment Purge System and Pressure Relief Line Isolation - Automatic Actuation Logic and Actuation Relays. | 3.1.F.1 3.8.A.1 T 3.5-4, No.4a | T 3.3.6-1, No. 1 |
| A.4 | Adopts NUREG-1431 presentation and organization of requirements for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and Function 2.b, Particulate Containment Radiation Monitor (R-41). | T 4.1-1, No. 19 T 3.5-4, No.4a | T 3.3.6-1, No. 2a T 3.3.6-1, No. 2b |
| A.4.A | Adopts NUREG-1431 presentation and organization of Applicability requirements for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and 3.3.6, Function 2.b, Particulate Containment Radiation Monitor (R-41). | T 3.5-4, No.4a 3.1.F.1 3.8.A.1 | 3.3.6 |
| A.4.B | Adopts NUREG-1431 presentation of requirements for number of channels for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and Function 2.b, Particulate Containment Radiation Monitor (R-41). | 3.1.F.1.b.(6) T 3.5-4, No.4a | 3.3.6 |
| A.4.C | Adopts NUREG-1431 presentation and organization of Required Actions for one inoperable channel: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) or Function 2.b, Particulate Containment Radiation Monitor (R-41). | 3.1.F T 3.5-4, No.4a | 3.3.6 RA-A.1 |
| A.4.D | Adopts NUREG-1431 presentation and organization of Actions for loss of function or extended loss of redundancy for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and Function 2.b, Particulate Containment Radiation Monitor (R-41). | 3.1.F T 3.5-4, No.4a | 3.3.6 RA-B.1 |
| A.4.E | Adopts NUREG-1431 presentation and organization of Surveillance requirements for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and Function 2.b, Particulate Containment Radiation Monitor (R-41). | T 4.1-1, No. 19 | 3.3.6.1 SR 3.3.6.3 SR 3.3.6.6 SR |
| A.4.F | Adopts NUREG-1431 presentation and organization of Allowable Values and Setpoints for: ITS 3.3.6, Function 2.a, Gaseous Containment Radiation Monitor (R-42) and Function 2.b, Particulate Containment Radiation Monitor (R-41). | T 3.5-4, No.4a | T 3.3.6-1, No. 2a T 3.3.6-1, No. 2b |
| A.5 | Adds explicit requirement that ITS LCO 3.3.6, Function 3, Containment Purge System and Pressure Relief Line Isolation - Containment Isolation - Phase A, is a required function that is actuated by ITS LCO 3.3.2, Function 3.a, Containment Isolation - Phase A. | 3.1.F | T 3.3.6-1, No. 3 |
| A.6 | Adds explicit requirement that ITS LCO 3.3.6, Function 4, Containment Purge System and Pressure Relief Line Isolation - Containment Spray, is a required function that is actuated by ITS LCO 3.3.2, Function 2, Containment Spray. | 3.1.F | T 3.3.6-1, No. 4 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|---|--------------------------------------|
| A.7 | Clarifies that differences between the requirements in CTS 3.5.2, CTS 3.5.3, CTS 3.5.4 and CTS 3.5.5 and the equivalent ITS requirements are addressed in ITS 3.3.2 because ITS 3.3.6, Table 3.3.6 Function 3, Containment Isolation - Phase A, and Function 4, Containment Spray, establish requirements for these functions with the statement "Refer to LCO 3.3.2, 'ESFAS Instrumentation,' for all initiation functions and requirements." | 3.5.2 3.5.3 3.5.4 3.5.5 T 3.5-2 T 3.5-3 T 3.5-3 | T 3.3.6-1, No. 3 T 3.3.6-1, No. 4 |
| ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.H 4.4.E | 3.3.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.H 4.4.E | 3.3.7 |
| A.3 | Clarifies the requirement that the control room ventilation system be operable includes the requirement for automatic actuation on each of the following: 1) Manual Initiation, 2) Control Building air Intake Radiation Monitor; 3) Control Room air Intake Radiation Manager; and 4) Safety injection signal. These or a high radiation signal based on the CTS surveillance requirement for periodic verification that the control room ventilation system actuates on a safety injection signal or a high radiation signal. | 3.3.H.1 4.4.E.4.b | 3.3.7 |
| A.4 | Clarifies that the requirement that the reactor be brought "to a hot shutdown condition utilizing normal operating procedures" if requirements for the control room ventilation system are not met is equivalent to the ITS requirement that the reactor be in Mode 3 within 6 hours. | 3.3.H.1 | 3.3.7 RA-B.1 |
| A.5 | Clarifies that the ITS is designed to allow completely separate re-entry into any Condition including separate tracking of Completion Times based on this re-entry for CRVS actuation on a high radiation signal and CRVS actuation on an SI signal. | 3.3.H.1 | 3.3.7 RA-Note |
| A.6 | Adds explicit requirement that LCO 3.3.7, Function 4, Control Room Ventilation System Instrumentation - Safety Injection (LCO 3.3.2, Function 1) will actuate control room ventilation to the pressurization mode. | 3.3.H | 3.3.7 LCO |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--------------|--------------|
| ITS SPECIFICATION 3.4.1 – RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.G | 3.4.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.G | 3.4.1 |
| ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.C | 3.4.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.2 |
| A.3 | Revises description of LCO Applicability from "In no case shall the reactor be made critical" to Mode 1 and Mode 2 with K_{eff} greater than or equal to 1.0. | 1.0 | 1.0 3.4.2 |
| ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.B 4.3 | 3.4.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1 4.3 | 3.4.3 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------------|------------------|
| A.3 | Adds an explicit statement that reactor coolant system temperature and pressure and system heatup and cooldown rate limits are applicable at all times. | 3.1.B | 3.4.3 App |
| ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2 | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A | 3.4.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.4 |
| A.3 | Clarifies the CTS requirement that reactor coolant pumps (RCPs) must be in operation means that RCS loop must be Operable and the RCP must be in operation. | 3.1.A.1.a | 3.4.4 LCO |
| ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3 | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A | 3.4.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.5 |
| A.3 | Deletes the statement that Operability requirements for reactor coolant pumps and/or residual heat removal pumps are contained in CTS Table 3.1.A-1 because the format and presentation of the ITS eliminates the need for cross references. | 3.1.A.1.c T 3.1.A-1 | 3.4.5 |
| A.4 | Revised description of LCO Applicability from "Hot Shutdown Tavg > 350°F" to "Mode 3." | 3.1.A.2 T 3.1.A-1 | 3.4.5 App |
| A.5 | Deletes statement that the Actions for an RCP not in operation must be initiated if an RCP pump is not restored to operating status within the one hour allowable out of service time. | T 3.1.A-1(1) | 3.4.5 LCO 1.3 |
| ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4 | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A | 3.4.6 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|------------------------|------------------------------|
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.6 |
| A.3 | Deletes the statement that Operability requirements for reactor coolant pumps and/or residual heat removal pumps are contained in CTS Table 3.1.A-1 because the format and presentation of the ITS eliminates the need for cross references. | 3.1.A.1.c T 3.1.A-1 | 3.4.6 |
| A.4 | Revises description of LCO Applicability from "Hot Shutdown T_{avg} less than or equal to 350°F" to "Mode 4." | T 3.1.A-1 | 3.4.6 App |
| A.5 | Deletes statement that the Actions for an RCP or RHR pump not in operation must be initiated if an RCP or RHR pump is not restored to operating status within the one hour allowable out of service time. | T 3.1.A-1(2) | 3.4.6 1.3 |
| A.6 | Clarifies that the CTS required action for no (RHR or RCP) pumps operable applies to both a condition when none of the required RCS or RHR loops are operable (as stated in the CTS) and a condition when no RCS or RHR loops are in operation (only implied by the CTS). This change eliminates a potential ambiguity that a loop could be inoperable but the associated pump considered to be in Operation. | T 3.1.A-1(2) | 3.4.6 RA-B.1 3.4.6 RA-B.2 |
| ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A | 3.4.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.7 |
| A.3 | Deletes the statement that Operability requirements for reactor coolant pumps and/or residual heat removal pumps are contained in CTS Table 3.1.A-1 because the format and presentation of the ITS eliminates the need for cross references. | 3.1.A.1.c T 3.1.A-1 | 3.4.7 |
| A.4 | Revised description of LCO Applicability from "Cold Shutdown" to "Mode 5, loops filled" and differentiates between "Mode 5, loops filled" and "Mode 5, loops not filled" which is addressed in ITS 3.4.8. | T 3.1.A-1(3) | 3.4.7 APP |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--|--|
| A.5 | Clarifies that the required action when fewer than the required number of pumps are operable applies to both a condition when no RHR loops are operable (as stated in the CTS) and a condition when no RHR loops are in operation (only implied by the CTS). This change eliminates a potential ambiguity that a pump could be inoperable but considered to be in operation. | T 3.1.A-1(3) | 3.4.7 RA-B.1 3.4.7 RA-B.2 |
| A.6 | Adds explicit requirements to immediately initiate action to restore the minimum required number of RHR loops to Operable and operating status when minimum required RHR loops are not operable and/or not in operation. | T 3.1.A-1(3) | 3.4.7 RA-A.1 3.4.7 RA-B.1 3.4.7 RA-C.2 |
| ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A | 3.4.8 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.8 |
| A.3 | Deletes the statement that Operability requirements for reactor coolant pumps and/or residual heat removal pumps are contained in CTS Table 3.1.A-1 because the format and presentation of the ITS eliminates the need for cross references. | 3.1.A.1.c T 3.1.A-1 | 3.4.8 |
| ITS SPECIFICATION 3.4.9 – PRESSURIZER | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.C.4 | 3.4.9 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.9 |
| A.3 | Replaces CTS term "reactor coolant system is above 350°F" with Mode 1, 2 and 3; replaces CTS term "reactor shall be maintained subcritical by at least 1%" with Mode 1 and 2; replaces the CTS term "hot shutdown condition" with Mode 3; and, replaces the term "cooled to below 350°F" with Mode 4. | 1.0 3.1.A.6.a 3.1.A.6.b 3.1.C.4 | 3.4.9 App 3.4.9 RA-C.1 3.4.9 RA-C.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|---------------------------|
| ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A.3 | 3.4.10 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A.3 | 3.4.10 |
| A.3 | Clarifies the CTS requirement that all pressurizer code safety valves shall be Operable to mean that 3 pressurizer code safety valves shall be Operable. | 3.1.A.3.b | 3.4.10 LCO |
| A.4 | Clarifies that the CTS requirement that pressurizer code safety valve lift setting shall be "set" at 2485 psig with a plus or minus 1% allowance for error means that pressurizer safety valve setpoint limit (i.e., Operability requirement) is a plus or minus 1% of the nominal 2485 psig setpoint. The LCO is that the valves must be reset to plus or minus 1% of the nominal 2485 psig setpoint during the Surveillance to allow for drift during the SR interval. | 3.1.A.3.c | 3.4.10 LCO 3.4.10.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|--|-------------------|
| ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A.5 | 3.4.11 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1 | 3.4.11 |
| A.3 | Replaces CTS terms hot shutdown, cold shutdown, RCS is above 350°F, etc. with the equivalent ITS terms Modes 1, 2, 3, 4 and 5 consistent with the definitions in CTS 1.0 and ITS 1.0. | 1.0 3.1.A.5.a 3.1.A.5.b 3.1.A.5.c 3.16.A 3.16.B 3.16.C | 1.0 3.4.11 LCO |
| A.4 | Clarifies that separate Condition entry is allowed for each PORV which in conjunction with the ITS Specification 1.3, "Completion Times," provides direction consistent with the intent of the ITS Actions for inoperable PORVs or block valves. | 3.1.A.5 | 3.4.11 RA-Note 1 |
| A.5 | Superceded by TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints." | NA | NA |
| A.6 | Deletes cross references between CTS 3.1.A.5, "Power Operated Relief Valves (PORVs)/Block Valves," and CTS 3.16, "Reactor Coolant System Vents," because ITS reorganizes requirements for PORVs into one location and relocates requirements for reactor head vents to a licensee document controlled in accordance with 10 CFR 50.59. | 3.1.A.5.e 3.16 | 3.4.11 R.7 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------------|----------------------------|
| ITS SPECIFICATION 3.4.12 – Low Temperature Overpressure Protection (LTOP) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.A.4 4.18.A | 3.4.12 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.18.A | 3.4.12 |
| A.3 | Clarifies that CTS 3.1.A.4.a and CTS Table 3.1.A-2 requirement that "the OPS" is Operable is a requirement for "two power operated relief valves (PORVs)." | 3.1.A.4.a T 3.1.A-2 | 3.4.12.a.1 LCO |
| A.4 | Replaces CTS requirement that the OPS is "armed and operable" which is used to convey that the power operated relief valves are configured to function as the Overpressure Protection System with the ITS requirement that the power operated relief valves (PORVs) be operable with lift settings within the limits specified in the Figure 3.4.12-1. | 3.1.A.4.a | 3.4.12.a LCO F 3.4.12-1 |
| A.5 | Establishes Actions for an inoperable PORV without mentioning the status of the associated block valve because the ITS Bases provide the clarification that the block valve associated with each PORV must be fully open for the PORV to be considered OPERABLE. | 3.1.A.4.b | 3.4.12 RA-C.1 |
| A.6 | Eliminates CTS requirements for special reports to the NRC that duplicate requirements in 10 CFR 50.72 and 10 CFR 50.73. | 3.1.A.4.c 6.9.2 | 3.4.12 |
| A.7 | Superceded by Amendment 225. | NA | NA |
| A.8 | Provides clarification that RCP starting requirements apply to a pump being jogged is retained in the Bases for ITS SR 3.4.12.8. | T 3.1.A-2 | 3.4.12.8 SR |
| A.9 | Superceded by Amendment 224. | NA | NA |
| ITS SECTION 3.4.13 - RCS OPERATIONAL LEAKAGE | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.F 4.16 | 3.4.13 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A 4.16 | 3.4.13 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|---|-------------------------------|
| A.3 | Replaces CTS terms hot shutdown, cold shutdown, etc. with the equivalent ITS terms Modes 1, 2, 3, 4 and 5 consistent with the definitions in CTS 1.0 and ITS 1.0. | 3.1.F.2.a.(1) 3.1.F.2.c.(1) 3.1.F.2.c.(2) 3.1.F.2.c.(3) 1.0 | 3.4.13 App 1.0 |
| A.4 | Establishes the link that the Steam Generator (SG) Tube Surveillance Program in CTS 4.13 and maintained by ITS 5.5.7 must be met as a prerequisite for meeting Operability requirements for RCS Operational leakage. | 4.16 | 3.4.13.2 SR 5.5.8 |
| ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.F 4.16 | 3.4.14 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A 4.16 | 3.4.14 |
| A.3 | Adds an explicit statement that RCS/RHR leakage limits do not apply to valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. | 3.1.F.2.b.(1) 4.16.A.5 | 3.4.14 App |
| A.4 | Adds statement that separate condition entry is allowed for each pressure isolation valve. This change is needed to support the a new allowance permitting 4 hours to establish compensatory action and 72 hours for restoration of double barrier protection for the RCS pressure boundary if limits for RCS/RHR leakage are not met. | 3.1.F.2.b(1) 3.1.F.2.b(2) | 3.4.14 RA-Note 1 |
| A.5 | Adds statement that entry into applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV or the Action taken in response to an inoperable PIV. This change is needed to support the a new allowance permitting 4 hours to establish compensatory action and 72 hours for restoration of double barrier protection for the RCS pressure boundary if limits for RCS/RHR leakage are not met. | 3.1.F.2.b(1) | 3.4.14 RA-Note 2 3.0.6 LCO |
| A.6 | Clarifies that CT Frequency of "every refueling" for testing RCS/RHR pressure boundary leakage means "In accordance with the Inservice Testing Program, and 24 months." | 4.16.A.5 | 3.4.14.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--|-------------------------|
| A.7 | Deletes explicit statement that RCS/RHR pressure boundary leakage testing shall be performed "prior to returning the valve to service after maintenance, repair or other work is performed" because the Bases for SR 3.0.1 include the clarification that upon completion of maintenance, appropriate post maintenance testing is required to declare equipment Operable. This includes ensuring applicable Surveillances are not failed. | 4.16.A.5 | 3.4.14.1 SR 3.0.1 SR |
| ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.F 4.16 | 3.4.15 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A 4.16 | 3.4.15 |
| A.3 | Replaces CTS terms hot shutdown, cold shutdown, etc. with the equivalent ITS terms Modes 1, 2, 3, 4 and 5 consistent with the definitions in CTS 1.0 and ITS 1.0. | 3.1.F.1.a 3.1.F.1.b 3.1.F.1.c | 3.4.15 App 1.0 |
| A.4 | Superseded by Amendment 225. | NA | NA |
| A.5 | Clarifies that the CTS requirement for continuous checks of Containment Iodine Particulate Monitor or Gas Monitor is equivalent to the requirements in CTS 3.1.F and ITS 3.4.15 that one of these instruments is Operable. | T 4.1-2, No.10 T4.1-2, Footnote 5 3.1.F.1.a.6 | 3.4.15 LCO |
| ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.1.D | 3.4.16 LCO |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.1.A | 3.4.16 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEM (ECCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|------------------|--------------------------|
| ITS SPECIFICATION 3.5.1 - ACCUMULATORS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.A | 3.5.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.A | 3.5.1 LCO |
| A.3 | Replaces CTS term "hot shutdown condition utilizing normal operating procedures" with "Be in Mode 3" within 6 hours. | 3.3.A.2 | 3.5.1 RA-C.1 |
| A.4 | Adds explicit statement that entry into ITS LCO 3.0.3 is required if two or more accumulators are inoperable. | 3.0.1 | 3.0.3 |
| ITS SPECIFICATION 3.5.2 - ECCS - OPERATING | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.A | 3.5.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.A 4.5.A.1 | 3.5.2 |
| A.3 | Replaces CTS term "hot shutdown condition utilizing normal operating procedures" with "Be in Mode 3" within 6 hours. | 3.3.A.2 | 3.5.2 RA-B.1 |
| A.4 | Adds clarification that either an actual or simulated actuation signal to verify valve actuation and pump start on receipt of a safety injection actuation signal is acceptable. | 4.5.A.1.a | 3.5.2.4 SR 3.5.2.5 SR |
| A.5 | Explains general reorganization of Action requirements in the transition from CTS 3.3.A to ITS 3.5.2. | 3.3.A.2 | 3.5.2 RA-A.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------------|---------------------------|
| ITS SPECIFICATION 3.5.3 - ECCS – SHUTDOWN | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.A | 3.5.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.A | 3.5.3 LCO |
| ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.A | 3.5.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.A | 3.5.4 LCO |
| A.3 | Adds a clarification that CTS requirement for RWST low level "alarms" is a requirement for two redundant channels as specified in the UFSAR. | 3.3.A.1.k | 3.5.4 LCO |
| A.4 | Replaces CTS term "hot shutdown condition utilizing normal operating procedures" with "Be in Mode 3" within 6 hours. | 3.3.A.2 | 3.5.4 RA-D.1 |
| A.5 | Clarifies that RWST low level alarm required by Technical Specifications is the alarm associated with control room annunciator "RWST level low-low." | 3.3.A.1.k 3.3.A.2.f | 3.5.4 LCO 3.5.4 RA-B.1 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.6 - CONTAINMENT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|-----------------------|--|
| ITS SPECIFICATION 3.6.1 - CONTAINMENT | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 1.7 3.6.A | 3.6.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.6.A 4.4.A | 3.6.1 |
| A.3 | Explains that IP2 ITS does not include a definition for "Containment Integrity" because the requirements for and descriptions of containment integrity described in CTS 1.7 and CTS 3.6.A.1 are maintained in the ITS LCOs and SRs and the associated Bases. ITS maintains existing requirements by dividing the containment Operability requirements into five separate LCOs: ITS 3.6.1 which requires that the containment is Operable; ITS 3.6.2 which requires that the containment air locks are Operable; ITS 3.6.3 which requires that each containment isolation valve is Operable; ITS LCO 3.6.9 which requires that IVSW is Operable; and ITS 3.6.10 which requires that WC&PPS is Operable. In conjunction with this change, the CTS definition of Containment Integrity is deleted. | 1.7 3.6.A 4.4.A | 3.6.1 LCO 3.6.2 3.6.3 3.6.9 3.6.10 |
| A.4 | Revises nomenclature for Applicability from "whenever the reactor is above cold shutdown" to "Modes 1, 2, 3 and 4." | 3.6.A.1 | 3.6.1 App |
| A.5 | Clarifies that requirement for post maintenance testing that is specific to containment integrity is maintained as ITS SR 3.0.1 for post maintenance testing that applies to all systems and components governed by Technical Specifications. | 4.4.E | 3.0.1 SR 3.6.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|--|--|
| ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 1.7.c 3.6.A 4.4.C | 3.6.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.6.A 4.4.A | 3.6.2 |
| A.3 | Explains that IP2 ITS does not include a definition for "Containment Integrity" because the requirements for and descriptions of containment integrity described in CTS 1.7 and CTS 3.6.A.1 are maintained in the ITS LCOs and SRs and the associated Bases. ITS maintains existing requirements by dividing the containment Operability requirements into five separate LCOs: ITS 3.6.1 which requires that the containment is Operable; ITS 3.6.2 which requires that the containment air locks are Operable; ITS 3.6.3 which requires that each containment isolation valve is Operable; ITS 3.6.9 which requires that IVSW is Operable; and ITS 3.6.10 which requires that WC&PPS is Operable. In conjunction with this change, the CTS definition of Containment Integrity is deleted. | 1.7 3.6.A.1 4.4.A | 3.6.2 LCO 3.6.1 3.6.3 3.6.9 3.6.10 |
| A.4 | Revises nomenclature for Applicability from "whenever the reactor is above cold shutdown" to "Modes 1, 2, 3 and 4." | 3.6.A.1 | 3.6.2 APP |
| A.5 | Clarifies that the IP2 plant has two personnel containment air locks. | 1.7.c 3.6.A.1.d | 3.6.2 LCO |
| A.6 | Clarifies that the ITS term "Operable" (i.e., capable of performing its specified safety function) is a reasonable interpretation of the CTS term "properly closed" when applied to containment airlocks. | 1.7.c 3.6.A.1.d 3.6.A.1.f 4.4.C | 3.6.2 LCO 3.6.2.1 SR |
| A.7 | Clarifies that Conditions and Required Actions of LCO 3.6.1, "Containment," are applicable when air lock leakage results in exceeding the overall containment leakage rate. | 3.6.A.3 | 3.6.2 RA-Note 3 |
| A.8 | Clarifies that Actions for one inoperable airlock door or inoperable air lock door interlock are not applicable if both airlock doors are inoperable because Actions for one inoperable airlock door or inoperable air lock door interlock may interfere with Actions to promptly restore an airlock door to Operable. | 1.7.c 3.6.A.3 | 3.6.2 RA-A.1 3.6.2 RA-B.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|---------------------------|--|
| A.9 | Clarifies that one inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. | 3.6.A.1.f 1.7.e 4.4 | 3.6.2.1 SR |
| A.10 | Clarifies that results of airlock tests must be evaluated against acceptance criteria applicable to SR 3.6.1.1, Containment Leakage Rate Testing Program. | 3.6.A.1.f 1.7.e | 3.6.2.1 SR 3.6.1.1 SR |
| A.11 | Not Used. | NA | NA |
| A.12 | Clarifies that Conditions and Required Actions of LCO 3.6.10, "Weld Channel and Penetration Pressurization System," are applicable when required WC&PPS supply to an air lock is inoperable. | 3.6.A | 3.6.2 RA-Note 4 3.6.10 LCO |
| ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.6.A 4.4.A | 3.6.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.6.A 4.4.A | 3.6.3 |
| A.3 | Explains that IP2 ITS does not include a definition for "Containment Integrity" because the requirements for and descriptions of containment integrity described in CTS 1.7 and CTS 3.6.A.1 are maintained in the ITS LCOs and SRs and the associated Bases. ITS maintains existing requirements by dividing the containment Operability requirements into five separate LCOs: ITS 3.6.1 which requires that the containment is Operable; ITS 3.6.2 which requires that the containment air locks are Operable; ITS 3.6.3 which requires that each containment isolation valve is Operable; ITS 3.6.9 which requires that IVSW is Operable; and ITS 3.6.10 which requires that WC&PPS is Operable. In conjunction with this change, the CTS definition of Containment Integrity is deleted. | 1.7 3.6.A.1 4.4.A | 3.6.3 3.6.1 3.6.2 3.6.9 3.6.10 |
| A.4 | Revises nomenclature for Applicability from "whenever the reactor is above cold shutdown" to "Modes 1, 2, 3 and 4." | 3.6.A.1 | 3.6.3 APP |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|------------------------|--|
| A.5 | Explains how format and structure of ITS 3.6.3 eliminates need for clarification statements in CTS 3.6.A.3.a.1 and CTS 3.6.A.3.a.1, Note 2. | 3.6.A.3.a.1 | 3.6.3 RA-A.1 3.6.3 RA-A.2 3.6.3 RA-B.1 3.6.3 RA-C.1 3.6.3 RA-C.2 |
| A.6 | Eliminates explicit statement of the option of restoring inoperable containment isolation valves to operable status when one or more containment isolation valves are inoperable because LCO 3.0.2 specifies that if an LCO is met or is no longer applicable prior to expiration of the specified Completion Times, completion of the Required Actions is not required unless otherwise stated. | 3.6.A.3.a.2(a) | 3.6.3 LCO 3.0.2 LCO |
| A.7 | Adds Note that explicitly requires entry into applicable Conditions and Required Actions for systems made inoperable by containment isolation valves that are closed to satisfy Required Actions. | 3.6.A | 3.6.3 RA-Note 3 3.0.6 LCO |
| A.8 | Adds Note that explicitly requires entry into applicable Conditions and Required Actions of LCO 3.6.1, Containment, when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria. | 3.6.A | 3.6.3 RA-Note 4 3.6.1 LCO |
| A.9 | Maintains CTS requirements by adding Notes that require entry into Conditions for LCO 3.6.9, Isolation Valve Seal Water (IVSW) System, and LCO 3.6.10, Weld Channel & Penetration Pressurization System (WC&PPS), versus declaring the affected containment isolation valves inoperable when IVSW or WC&PPS are inoperable. | 3.6.A | 3.6.3 RA-Note 5 3.6.3 RA-Note 6 3.6.9 LCO 3.6.10 LCO |
| A.10 | Superceded by Amendment 225. | NA | NA |
| A.11 | Not Used. | NA | NA |
| A.12 | Adds an explicit statement that separate Condition entry is allowed for each penetration flow path which maintains the existing allowance. | 3.6.A.3 3.6.A.3.a | 3.6.3 RA-Note 2 |
| A.13 | Clarifies that requirement for post maintenance testing that is specific to containment integrity is maintained as ITS SR 3.0.1 for post maintenance testing that applies to all systems and components governed by Technical Specifications. | 4.4.E | 3.6.3 |
| A.14 | Clarifies that the information provided by Footnote 3 to CTS 3.6.A.1.b and CTS 3.6.A.1.c provides options that are equivalent to the options provided by ITS LCO 3.6.3, Required Actions A.1, B.1 and C.1 which include use of both the inboard and outboard containment isolation valve. | 3.6.A.1.b 3.6.A.1.c | 3.6.3 RA-A.1 3.6.3 RA-B.1 3.6.3 RA-C.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-----------------------------------|------------------------|
| A.15 | Clarifies that the existing requirement that the "leakage rate into containment for the isolation valves sealed with the service water system shall not exceed 0.36 gpm per fan cooler" is maintained as SR 3.6.3.8 with the acceptance criteria maintained in ITS 5.5.14.e. | 4.4.D.1 4.4.D.2.b | 3.6.3.8 SR 5.5.14.e |
| ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.6.B | 3.6.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.6.B | 3.6.4 |
| A.3 | Clarifies that the CTS Surveillance Frequency of "at least twice per calendar day" is equivalent to an ITS Frequency of once per 12 hours. | 3.6.B T 4.1-1, No.18b T 1-1 | 3.6.4.1 SR |
| ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.6.C | 3.6.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.6.C | 3.6.5 |
| A.3 | Replaces CTS term "above the cold shutdown condition" with the equivalent ITS term Modes 1, 2, 3, and 4 consistent with the definitions in CTS 1.0 and ITS 1.0. | 3.6.C | 3.6.5 App |
| ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER (CFU) SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.B 4.5.B 4.5.D | 3.6.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.B 4.5.B 4.5.D | 3.6.6 |
| A.3 | Uses the term "train" to describe the combination of a containment spray pump and its associated valves and piping or one or more fan cooler units powered from the same safeguards power train and their associated valves and piping. | 3.3.B.1.b | 3.6.6 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|-------------------------------|--|
| A.4 | Adds explicit statement that entry into ITS LCO 3.0.3 is required if the combination of inoperable fan cooler units (i.e., containment fan cooler trains) and/or inoperable containment spray trains result in less than the minimum functional capability assumed in the accident analysis. | 3.0.1 3.3.B | 3.6.6 RA-F.1 3.0.3 |
| A.5 | Deletes a one time extension to selected SR Frequencies that expires with the refueling outage scheduled to start June 3, 2000. | 4.5.B.1 4.5.D.4.b T 1-1 | 3.6.6.2 SR 3.6.6.5 SR 3.6.6.6 SR |
| A.6 | Not Used. | NA | NA |
| A.7 | Superseded by Amendment 211. | NA | NA |
| A.8 | Clarifies that CTS Frequency of "once every refueling interval (#)" is equivalent to once every 24 months as specified in CTS Table 1-1. | 4.5.D.2 | 3.6.6.9 SR |
| ITS SPECIFICATION 3.6.7 – RECIRCULATION PH CONTROL SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.B 4.5.H | 3.6.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.B 4.5.H | 3.6.7 |
| A.3 | Adopts NUREG-1431 presentation for Surveillance Frequency of 24 months versus CTS use of each refueling interval (R#) with reference to CTS table 1.1. | 4.5.H.1 T 1-1 | 3.6.7.1 SR |
| ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.G 4.5.C | 3.6.8 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3 4.5 | 3.6.8 |
| A.3 | Not Used. | NA | NA |
| A.4 | Adopts NUREG-1431 presentation for Surveillance Frequency of 24 months versus CTS use of each refueling interval (R#) with reference to CTS table 1.1. | 4.5.C.1 4.5.C.2 T 1-1 | 3.6.8.1 SR 3.6.8.2 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|----------------------|----------------------------|
| ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.C 4.4.D | 3.6.9 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.C | 3.6.9 |
| A.3 | Revises nomenclature for Applicability from "whenever the reactor is above cold shutdown" to "Modes 1, 2, 3 and 4." | 3.3.C.1 | 3.6.9 App |
| A.4 | Deletes CTS Statement that the shutdown shall start no later than the end of the specified period because the requirement being deleted is maintained by ITS 1.3, Completion Times. | 3.3.C.2 3.3.C.3.a | 1.3 |
| A.5 | Clarifies that ITS LCO 3.6.9, Condition A and Required Action A.1, maintain the existing requirement in CTS 3.3.C.2.b that only one of the two header actuation valves in each IVSW header may be inoperable at any one time. | 3.3.C.2.b | 3.6.9 RA-A.1 |
| A.6 | Clarifies that adopting the presentation "one IVSW automatic actuation valve inoperable" eliminates the need for the CTS clarification that the condition applies only if "all valves in the system that provide a duplicate function are operable." | 3.3.C.2.b | 3.6.9 RA-A.1 |
| ITS SPECIFICATION 3.6.10 – WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WC&PPS) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.D 4.4.B | 3.6.10 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.D 4.4.B | 3.6.10 |
| A.3 | Adds explicit statement that WC&PPS shall be Operable. | 3.3.D.1 | 3.6.10.1 SR 3.6.10.2 SR |
| A.4 | Revises nomenclature for Applicability from "whenever the reactor is above cold shutdown" to "Modes 1, 2, 3 and 4." | 3.3.D.1 T 1-1 | 3.6.10 APP |
| A.5 | Deletes CTS Statement that the shutdown shall start no later than the end of the specified period because the requirement being deleted is maintained by ITS 1.3, Completion Times. | 3.3.D.3.a 3.3.D.2 | 3.6.10 1.3 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|--|--------------------------------|
| A.6 | Adds clarification that directs entry into the applicable Conditions and Required Actions of LCO 3.6.1 if it is determined that WC&PPS inoperability is indicative of or results in exceeding the overall containment leakage rate. Clarification is needed to provide an exception to ITS LCO 3.0.6. | 3.3.D | 3.6.10 RA-Note 2 |
| A.7 | Clarifies that small variations in containment pressure during the performance of this test do not invalidate test results as long as WC&PPS pressure is maintained greater than or equal to 52 psi above containment pressure. | 4.4.B.1 | 3.6.10.3 SR |
| A.8 | Clarifies that the CTS term WC&PPS inoperable refers to a WC&PPS zone with one or more of the individual components supported by WC&PPS not at the specified minimum pressure. | 3.3.D.1.a 3.3.D.1.b 3.3.D.2.a 3.3.D.2.b | 3.6.10 RA-A.1 3.6.10 RA-A.2 |
| A.9 | Deletes a one time extension to selected SR Frequencies that expires with the refueling outage scheduled to start June 3, 2000. | 4.4.B.3 T 1-1 | 3.6.10 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.7 - PLANT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------|---|
| ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4 | 3.7.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4 | 3.7.1 |
| A.3 | Revises nomenclature for Applicability from "reactor shall not be heated above 350°F unless " to "Modes 1, 2 and 3." | 3.4.A | 3.7.1 |
| A.4 | Eliminates explicit statement of option of restoring inoperable MSSVs to operable status when one or more MSSVs are inoperable because LCO 3.0.2 specifies that if an LCO is met or is no longer applicable prior to expiration of the specified Completion Times, completion of the Required Action is not required unless otherwise stated. | 3.4.A.1 | 3.7.1 LCO 3.0.2 LCO |
| A.5 | Eliminates CTS statement that heat-up above 350°F and power operation is permissible with up to three of the five main steam line-safety valves per steam generator inoperable provided that the Actions for one or more inoperable MSSVs are met because it duplicates allowance in ITS LCO 3.0.4. | 3.4.A.1 T 3.4-1 | 3.0.4 LCO 3.7.1 RA-A.1 3.7.1 RA-B.1 3.7.1 RA-B.2 3.7.1 RA-C.1 3.7.1 RA-C.2 |
| A.6 | Reformats CTS requirement for a minimum ASME code-approved steam-relieving capability of twenty (20) main steam valves to ITS LCO 3.7.1, Table 3.7.1-2, that lists each of the 20 MSSVs by valve number. | 3.4.A.1 | 3.7.1 LCO T 3.7.1-2 |
| A.7 | Adds an explicit statement that Separate Condition entry is allowed for each inoperable MSSV because complying with the Required Actions for one inoperable MSSV will allow continued operation, and subsequent inoperable MSSVs are governed by separate Condition entry and application of associated Required Actions. | 3.4.A.1 | 3.7.1 RA-NOTE |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|-------------------------|--------------|
| A.8 | Eliminates generic statement that system piping and valves directly associated with the MSSVs must be operable when the MSSVs are Operable because system piping and valves directly associated with the MSSVs fall within the ITS definition of Operability. | 3.4.A.4 | 3.7.1 |
| A.9 | Clarifies that a reduction in Power Range Neutron Flux Trip Setpoint whenever more than one MSSV in one or more SGs is inoperable is not required in Modes 2 and 3 because the P-10 interlock, which is required to be Operable by ITS LCO 3.3.1, will automatically reduce the Power Range Neutron Flux Trip Setpoint to a value lower than any required by ITS Table 3.7.1-1 before reactor power is reduced below approximately 10% (i.e., before entering Mode 2 from Mode 1). | 3.4.A.1 | 3.7.1 RA-B.2 |
| ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4 4.7 | 3.7.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4 4.7 | 3.7.2 |
| ITS SPECIFICATION 3.7.3 - MAIN FEEDWATER ISOLATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.5 | 3.7.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.5 | 3.7.3 |
| A.3 | Clarifies that the feedwater isolation function (i.e., valve closure and main feed pump trip) is an implied requirement because the feedwater isolation actuation instrumentation is included in CTS. | 3.5.1 T 3.5-4, No. 3 | 3.7.3 |
| ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV)s | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4 4.8 | 3.7.4 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|----------------------|--------------|
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4 4.8 | 3.7.4 |
| ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4 | 3.7.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4 | 3.7.5 |
| A.3 | Eliminates statement that system piping and valves directly associated with the AFW pump must be operable when the AFW is Operable because system piping and valves directly associated with the AFW pump falls within the ITS definition of Operability for Auxiliary Feedwater. | 3.4.A.2 3.4.A.4 | 3.7.5 LCO |
| A.4 | Clarifies intent of CTS requirement when 3 AFW pumps are inoperable is equivalent to ITS allowance that LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is restored to OPERABLE status. | 3.4.B.1.c 3.4.C.1 | 3.7.5 RA-D.1 |
| A.5 | Specifies that reportable events will be addressed in accordance with 10 CFR 50.72 and 10 CFR 50.73 and reporting requirements will not be included in the ITS. | 3.4.C.3 | 3.7.5 LCO |
| A.6 | Clarifies that if 3 AFW pumps are inoperable then both CTS and ITS require immediate initiation of action to restore an AFW pump to Operable and that these actions continue until successful. | 3.4.C.2 | 3.7.5 RA-D.1 |
| A.7 | Deletes generic statement that AFW tests "shall be considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly." | 4.8.B | 3.7.5 |
| ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK (CST) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4 | 3.7.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4 | 3.7.6 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------|----------------|
| A.3 | Eliminates generic statement that system piping and valves directly associated with the CST must be operable when the CST is Operable because system piping and valves directly associated with the CST falls within the ITS definition of Operability for CST and Auxiliary Feedwater. | 3.4.A.4 | 3.7.6 3.7.5 |
| ITS SPECIFICATION 3.7.7 – COMPONENT COOLING WATER (CCW) SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.E | 3.7.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.E | 3.7.7 |
| A.3 | Clarifies the requirement that the reactor shall be placed in the hot shutdown condition (i.e., Mode 3) utilizing normal operating procedures is met if the reactor is in Mode 3 within 6 hours. | 3.3.E.2 | 3.7.7 RA-B.1 |
| A.4 | Clarifies that ITS is designed to ensure that operators are not required to make a determination that "the system may still operate at design accident capability." | 3.3.E.2.d | 3.7.7 |
| A.5 | Maintains CTS requirement by adding Note taking exception to new allowance provided by ITS LCO 3.0.6 which would otherwise allow taking Required Actions for an inoperable CCW train only when an inoperable CCW train caused an RHR train to be inoperable. | 3.3.E 3.1.A.1.c | 3.7.7 RA-A.1 |
| A.6 | Clarifies that the isolation of CCW to components or systems may render those components inoperable, but does not affect the Operability of the CCW System. | 3.3.E | 3.7.7.1 SR |
| ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.F | 3.7.8 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.F | 3.7.8 |
| A.3 | Clarifies that the isolation of the components or systems cooled by service water may render those components inoperable but does not affect the Operability of the SWS. | 3.3.F | 3.7.8.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|-------------------------------------|--|
| A.4 | Clarifies that inoperability of "associated piping and valves" that prevents one SW pump from performing its safety function results in only that SW pump being inoperable; and, inoperability of "associated piping and valves" that prevents either the essential or non essential header from performing its safety function results in a loss of safety function which requires immediate plant shutdown. | 3.3.F.1 3.3.F.2 | 3.7.8 RA-A.1 3.7.8 RA-B.1 3.7.8.1 SR |
| ITS SPECIFICATION 3.7.9 – ULTIMATE HEAT SINK (UHS) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3.F | 3.7.9 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3.F | 3.7.9 |
| A.3 | Deletes statement that CTS Specification 3.0.1 do not apply to service water inlet temperature in conjunction with expanding the requirements for UHS availability to include Mode 4. | 3.3.F.4.c 3.3.F.1.a 3.3.F.2.a | 3.7.9 |
| ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.3 3.5 | 3.7.10 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.3 3.5 | 3.7.10 |
| A.3 | Requires that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) if the requirements for the control room ventilation system are not met within the specified completion time. | 3.3.H.1 | 3.7.10 RA-C.1 |
| A.4 | Adds clarification that the "control room boundary may be opened intermittently under administrative control" such as normal ingress and egress or minor maintenance when there is a method to rapidly close the opening and when a need for control room isolation is indicated. | 3.3.H.1 | 3.7.10 |
| A.5 | Superceded by Amendment 225. | NA | NA |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------|-------------|
| ITS SPECIFICATION 3.7.11 – SPENT FUEL PIT WATER LEVEL | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8.C.2 | 3.7.11 |
| A.2 | Not Used. | NA | NA |
| ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8.A | 3.7.12 |
| A.2 | Not Used. | NA | NA |
| A.3 | Clarifies that requirements for spent fuel pit boron concentration apply only when fuel assemblies are stored in the spent fuel pit. | 3.8.D 3.8.D.3 | 3.7.12 App |
| ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8.D.1 | 3.7.13 |
| A.2 | Not Used | NA | NA |
| A.3 | Adds explicit requirement to verify that requirements for fuel assembly storage locations will be met before a fuel assembly is inserted in the spent fuel pit. | 3.8.D.1 | 3.7.13.1 SR |
| A.4 | Not used. | NA | NA |
| ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.4.A.6 | 3.7.14 |
| A.2 | Deletes CTS statements labeled “Objective” and “Applicability” because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.4.A | 3.7.14 |
| A.3 | Restates requirements for steam generator secondary side activity levels for Dose Equivalent I-131 in units of micro curies per 'gram' instead of micro curies per 'cubic centimeter.' | 3.4.A.6 | 3.7.14 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------|--|
| ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.1 |
| A.3 | Superseded by Amendment 236. | NA | NA |
| A.4 | Superseded by Amendment 225. | NA | NA |
| A.5 | Explains how having only one 138 kV line from an offsite source to Buchanan Substation or having neither of the two 138/13.8 kV transformers is equivalent to the ITS Condition of having one offsite circuit inoperable. | 3.7.B.2 | 3.8.1 RA-A.1 3.8.1 RA-A.2 3.8.1 RA-A.3 3.8.1 RA-A.4 |
| A.6 | Adds an explicit statement that planned DG starts may be preceded by a prelube period consistent with the recommendations in Generic Letter 84-15 and current industry practice. | 4.6.A.1 | 3.8.1.2 SR 3.8.1.12 SR |
| A.7 | Adds explicit statements for the DG endurance run that DG loadings may include gradual loading as recommended by the manufacturer, momentary transients outside the load range do not invalidate this test, the SR shall be conducted on only one DG at a time and SR shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.2 (DG fast start test). | 4.6.A.1 | 3.8.1.3 SR |
| ITS SPECIFICATION 3.8.2 - AC SOURCES - SHUTDOWN | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|------------------|--------------------------------------|
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.2 |
| ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7.A | 3.8.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.6 | 3.8.3 |
| A.3 | Clarifies that Applicability for fuel oil and starting air requirements for DGs must match the Applicability requirements for the DGs being supported. | 3.7.A | 3.8.3 APP |
| A.4 | Adds an explicit statement that Separate Condition entry is allowed for each DG with an inoperable support system. | 3.7.A | 3.8.3 RA-Note 3.8.3 RA-B.1 1.3 |
| A.5 | Restates the minimum requirements for DG fuel oil in terms of 'usable' gallons rather than total volume in the tank. | 3.7.A.5 4.6.B | 3.8.3 RA-A.1 3.8.3.2 SR |
| ITS SPECIFICATION 3.8.4 - DC SOURCES – OPERATING | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.4 |
| A.3 | Superceded by Amendment 225. | NA | NA |
| A.4 | Eliminates explicit requirement that SR data is recorded. | 4.6.C.1 | 3.8.4.1 SR |
| A.5 | Clarifies that completion of a battery performance test or modified performance test in accordance with ITS LCO 3.8.6 satisfies the requirements for the battery service test. | 4.6.C.4 | 3.8.4.3 SR 3.8.4.6 SR |
| ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|--------------------------|
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.5 |
| ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 4.6 | 3.8.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.6 |
| A.3 | Deletes statement that surveillance test data must be recorded. | 4.6.C.1 | 3.8.6.2 SR 3.8.6.5 SR |
| ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 | 3.8.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 | 3.8.7 |
| ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 | 3.8.8 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 | 3.8.8 |
| ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.9 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.9 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|-------------|
| ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.7 4.6 | 3.8.10 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.7 4.6 | 3.8.10 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------|---------------------|
| ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8 | 3.9.1 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8 | 3.9.1 |
| A.3 | Clarifies that in both CTS 3.8 and ITS 3.9 requirements that apply "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" (i.e. Mode 6) also apply when "loading and unloading fuel from the reactor" (i.e., during core alterations). | 3.8.A 3.8.B.1 | 3.9.1 |
| A.4 | Clarifies that ITS definition of CORE ALTERATION in ITS 1.0 and the ITS LCO 3.9.1 Bases maintains the CTS stipulation that "Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position." | 3.8.B.12 | 1.0 3.9.1 RA-A.1 |
| A.5 | Maintains the existing clarification that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable during refueling operations (i.e. Mode 6). | 3.0.1 3.8.E | 3.0.3 LCO |
| ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8 | 3.9.2 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8 | 3.9.2 |
| A.3 | Clarifies that the CTS Applicability statement "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" is equivalent to the ITS Mode 6. | 3.8.A | 3.9.2 T 1.1-1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|------------------|------------------------------|
| A.4 | Adds an explicit requirement to immediately "Initiate action to restore one source range neutron flux monitor to OPERABLE status" if neither of the required SRMs is Operable in Mode 6. | 3.8.A.2 | 3.9.2 RA-B.1 3.9.1.1 SR |
| A.5 | Clarifies that the CTS requirement for "audible indication" for the source range monitor in Mode 6 is satisfied by audible count rate indication (versus an alarm) which is consistent with UFSAR 14.1.5.2. | 3.8.A.2 | 3.9.2 LCO |
| A.6 | Maintains the existing clarification that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable during refueling operations (i.e. Mode 6). | 3.0.1 3.8.E | 3.0.3 |
| ITS SPECIFICATION 3.9.3 – CONTAINMENT PENETRATIONS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8.A 3.8.B | 3.9.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8.A 3.8.B | 3.9.3 |
| A.3 | Clarifies that in both CTS 3.8 and ITS 3.9 requirements that apply "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" (i.e. Mode 6) also apply when "loading and unloading fuel from the reactor" (i.e., during core alterations). | 3.8.A 3.8.B.1 | 3.9.3 |
| A.4 | Clarifies that ITS definition of CORE ALTERATION in ITS 1.0 and the ITS LCO 3.9.3 Bases maintains the CTS stipulation that "Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position." | 3.8.B.12 | 3.9.1 RA-A.1 3.9.3 RA-A.1 |
| A.5 | Clarifies that ITS LCO 3.9.3 maintains the existing clarification in CTS 3.8.E that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable to LCOs that apply during refueling operations (i.e. Mode 6). | 3.8.E 3.0.1 | 3.0.3 3.9.3 |
| A.6 | Clarifies that the CTS requirement for a properly installed "closure plate that restricts direct air flow from the containment" to establish containment closure during refueling operations is maintained in ITS as "the equipment hatch opening is closed using an equipment hatch closure plate that may include a personnel access door." | 3.8.B.8 | 3.9.3.a |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-----------------------------|------------------------------|
| ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8 | 3.9.4 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8 | 3.9.4 |
| A.3 | Clarifies that the CTS Applicability statement "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" is equivalent to the ITS Mode 6. | 3.8.A 3.8.A.3 | 3.9.4 APP |
| A.4 | Clarifies that the term "loop" describes an RHR pump and an associated heat exchanger. | 3.8.A.3 | 3.9.4 LCO |
| A.5 | Maintains the existing clarification that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable during refueling operations (i.e. Mode 6). | 3.0.1 3.8.E | 3.0.3 LCO |
| A.6 | Clarifies that ITS definition of CORE ALTERATION in ITS 1.0 and the ITS LCO 3.9.4 Bases maintains the CTS stipulation that "Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position." | 3.8.B.12 | 3.9.4 RA-A.2 |
| ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8 | 3.9.5 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8 | 3.9.5 |
| A.3 | Clarifies that the CTS Applicability statement "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" is equivalent to the ITS Mode 6. | 3.8.A 3.8.A.4 | 3.9.5 APP |
| A.4 | Clarifies that the term "loop" describes an RHR pump and an associated heat exchanger. | 3.8.A.4 | 3.9.5 LCO |
| A.5 | Adds explicit statement that increasing RPV water level to greater than or equal to 23 feet above the RPV flange is an option when the requirement for redundant RHR loops (i.e., one loop in operation and one available for operation) is not met (i.e., one loop in operation but no backup available) because this water level eliminates LCO requirements for a backup RHR loop that is Operable but not in operation. | 3.8.A.3 3.8.A.5 3.0.1 | 3.9.5 RA-A.1 3.9.5 RA-A.2 |
| A.6 | Maintains the existing clarification that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable during refueling operations (i.e. Mode 6). | 3.0.1 3.8.E | 3.0.3 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|---------------------------|---------------------|
| ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. CTS Bases are deleted and replaced with comprehensive ITS Bases. | 3.8.B | 3.9.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.8.B | 3.9.6 |
| A.3 | Clarifies that CTS requirements for minimum water level above the top of the reactor pressure vessel flange applies only "During movement of irradiated fuel assemblies within containment." | 3.8.B 3.8.B.11 | 3.9.6 |
| A.4 | Clarifies that in both CTS 3.8 and ITS 3.9 requirements that apply "when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned" (i.e. Mode 6) also apply when "loading and unloading fuel from the reactor" (i.e., during core alterations). | 3.8.B 3.8.B.1 3.8.A | 3.9.6 |
| A.5 | Clarifies that ITS 1.0 Definition, CORE ALTERATION, and the ITS LCO 3.9.6 Bases maintains the CTS stipulation that "Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position." | 3.8.B.12 | 3.9.6 RA-A.1 1.0 |
| A.6 | Maintains the existing clarification that CTS 3.0.1 and the equivalent requirements in ITS LCO 3.0.3 are not applicable during refueling operations (i.e. Mode 6). | 3.0.1 3.8.E | 3.0.3 3.9.6 |

**TABLE A - ADMINISTRATIVE CHANGES TO THE CTS
ITS SECTION 4.0 - DESIGN FEATURES**

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|----------------|-------------|
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 5.0 | 4.0 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 5.0 | 4.0 |
| A.3 | Adds a text description of the site location that is consistent with existing description in the UFSAR. | 5.1.A | 4.1 |
| A.4 | Eliminates cross reference between CTS 5.3.A.3 and CTS 5.4. | 5.3.A.3 5.4 | 4.0 |

TABLE A - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------|-------------|
| ITS SPECIFICATION 5.1 - RESPONSIBILITY | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 6.1 | 5.1 |
| ITS SPECIFICATION 5.2 - ORGANIZATION | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 6.2 6.3 | 5.2 |
| A.2 | Substitutes 10 CFR 50.54 (m)(2)(iii) for CTS requirements for two licensed operators in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips because these requirements are less restrictive than those imposed by 10 CFR 50.54 (m)(2)(iii). | 6.2.2.c | 5.2 |
| A.3 | Clarifies that the minimum qualifications for the Watch Engineer (i.e., Shift Technical Advisor) required by CTS are consistent with the (NRC) Commission Policy Statement on Engineering Expertise on Shift. | 6.3.3 T 6.2-1 | 5.2.2.f |
| A.4 | Superceded by CTS Amendment 231. | NA | NA |
| A.5 | Superceded by CTS Amendment 231. | NA | NA |
| ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 6.3 | 5.3 |
| A.2 | Clarifies that the plant manager is a member of the unit staff and is covered by the requirement that each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. | 6.3.1 6.3.2 | 5.3.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|--------------------|------------------|
| A.3 | ITS 5.3.2 is added to clarify that a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of ITS 5.3.1, perform the functions described in 10 CFR 50.54(m). | 6.3 | 5.3.1 5.3.2 |
| A.4 | Clarifies that the operations manager shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement which shall be in accordance with Technical Specification 5.2.2.e. ITS 5.2.2.e requires that either the operations manager or assistant operations manager shall hold an SRO license. | 6.2.2.h 6.3.1 | 5.2.2.e 5.3.1 |
| ITS SPECIFICATION 5.4 - PROCEDURES | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 6.8 | 5.4 |
| A.2 | Deletes statement that the quality assurance program described or referenced in the Updated FSAR shall describe the mechanism for making temporary procedure changes. | 6.8.3 | 5.4 |
| A.3 | Clarifies that CTS requirements for written procedures for Process Control Program implementation and the Offsite Dose Calculation Manual implementation are included in the ITS 5.4.1.e requirement that written procedures must be established, implemented, and maintained for all programs required by ITS 5.5. | 6.8.1.b 6.8.1.c | 5.4.1.e |
| ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS | | | |
| ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 6.15 | 5.5.1 |
| A.2 | Deletes statement that ODCM shall be approved by the Commission prior to implementation because the IP2 ODCM has already been approved by the Commission and has been implemented. | 6.15.1 6.15.2 | 5.5.1 |
| A.3 | Eliminates explicit requirement that "documentation of the fact the change (to the ODCM) has been revised and found acceptable by the SNSC" must be included when changes to the ODCM are submitted to the NRC in the annual Radioactive Effluents Release Report. | 5.15.2.C | 5.5.1 |
| ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.4.H Lic 2.L | 5.5.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|------------------------------------|---|
| A.2 | Clarifies requirements for the program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident by including a list of the systems covered by the program. | Lic 2.L | 5.5.2 |
| A.3 | Deletes a one time extension to selected SR Frequencies that expires with the refueling outage scheduled to start June 3, 2000. | Lic 2.L T 1.1 | 5.5.2.b |
| A.4 | Adds an explicit statement that allowances of ITS 3.0.2 (i.e., allowance for 25% extension to the SR Frequency) is applicable to testing required by ITS 5.5.2, Primary Coolant Sources Outside Containment. This maintains existing allowances in CTS 4.0.1 and CTS 4.0.2. | 4.0.1 4.0.2 4.4.H Lic 2.L | 5.5.2 3.0.2 SR |
| A.5 | Clarifies that acceptance criteria in CTS 4.4.H.2 that leakage from Residual Heat Removal System components outside containment is less than 2 gallons per hour is not necessary because CTS 4.4.H is a subset of the newer requirements imposed by Facility Operating License DPR-26, paragraph 2.L, which limits leakage from all plant systems outside containment likely to contain radioactive material outside containment is less than 2 gallons per hour. | 4.4.H.2 | 5.5.2 |
| ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 3.9 4.10 | 5.5.3 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 3.9 4.10 | 5.5.4 |
| A.3 | Adds an explicit statement that allowances of ITS 3.0.2 (i.e., allowance for 25% extension to the SR Frequency) and ITS SR 3.0.3 (i.e., 24 hours to perform missed SR) are applicable to ITS 5.5.3, Radioactive Effluent Controls Program. This maintains existing allowances in CTS 4.0.1 and CTS 4.0.2. | 4.0.1 4.0.2 4.10 | 5.5.3 3.0.2 SR 3.0.3 SR 5.5.10 |
| ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.5 – REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.2.3 T4.2-1 | 5.5.5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|---------------------|---------------------|
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.2.3 T 4.2-1 | 5.5.5 |
| A.3 | Clarifies requirement that "flywheels shall be visually inspected at the first refueling" was completed during the first refueling and is no longer applicable. | 4.2.3 T 4.2-1 | 5.5.5 |
| A.4 | Clarifies that the requirement that "one different flywheel shall be examined" each refueling means that "the inspection frequency will ensure that each reactor coolant pump flywheel has been inspected during one of the four most recent refueling outages." | 4.2.3 T 4.2-1 | 5.5.5 |
| ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.1 4.2 | 5.5.6 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.1 4.2 | 5.5.6 |
| A.3 | Eliminates CTS requirements to perform Inservice testing in accordance with Section XI of the ASME Boiler and Pressure Vessel Code because these inspections are already required by 10 CFR 50.55.a(g). Requires that IP2 develop and maintain a program to implement these requirements. | 4.2.1 4.2.2 | 5.5.6 |
| A.4 | Clarifies testing Frequency nomenclature differences between Section XI of the ASME Boiler and Pressure Vessel Code and the ITS equivalent to what is found in CTS Table 1-1. | 4.1 4.2 T 1-1 | 5.5.6.a 5.5.6.b |
| A.5 | Adds an explicit statement that allowances of ITS SR 3.0.2 (i.e., a 25% extension) are applicable to the testing frequencies specified in the ASME Code. This maintains allowance already provided in CTS 4.0.1. | 4.0.1 4.2 | 5.5.6.b 3.0.2 SR |
| A.6 | Adds an explicit statement that allowances of ITS SR 3.0.3 (i.e., 24 hours to perform missed SR) are applicable to the testing frequencies specified in the ASME Code. This maintains allowance already provided in CTS 4.0.2. | 4.0.2 | 5.5.6.c 3.0.3 SR |
| A.7 | Adds an explicit statement that "Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS." | 4.2 | 5.5.6.d |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-----------------------------|--------------------|
| ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.13 | 5.5.7 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.13 | 5.5.7 |
| ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | Lic 2.D (2) | 5.5.8 |
| A.2 | Maintains existing requirements for a secondary water chemistry monitoring program to inhibit steam generator tube degradation. | Lic 2.D (2) | 5.5.8 |
| ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP) | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.5 | 5.5.9 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.5 | 5.5.9 |
| A.3 | Expresses existing CTS acceptance criteria for HEPA filter bank testing and charcoal adsorber testing consistent with Regulatory Positions 5.c and 5.d of Regulatory Guide 1.52, Revision 2, March 1978. | 4.5.E.5 4.5.E.6 | 5.5.9.a 5.5.9.b |
| A.4 | Clarifies that Regulatory Positions C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, assume completion of the requirements for visual inspection in accordance with Regulatory Position C.5.a of Regulatory Guide 1.52. | 4.5.E.5 4.5.E.2.C | 5.5.9.a 5.5.9.b |
| A.5 | Adopts NUREG-1431 presentation for Surveillance Frequency of 24 months versus CTS use of each refueling interval (R#) with reference to CTS table 1.1. Uses the term "standby service" to clarify that the Frequency is based on calendar limits and not the amount of time the system is in operation. | 4.5.E.2 4.5.E.4 T 1.1 | 5.5.9 |
| A.6 | Clarifies that Control Room Air Filtration System ventilation filters must be re-tested "after painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation." | 4.5.E.2 | 5.5.9 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|------------------------|--------------------------------|
| A.7 | Adds an explicit statement that allowances of ITS 3.0.2 (i.e., allowance for 25% extension to the SR Frequency) and ITS SR 3.0.3 (i.e., 24 hours to perform missed SR) are applicable to ITS 5.5.9, Ventilation Filter Testing Program (VFTP). This maintains existing allowances in CTS 4.0.1 and CTS 4.0.2. | 4.0.1 4.0.2 | 3.0.2 SR 3.0.3 SR 5.5.9 |
| ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 3.9.B 4.10.B | 5.5.10 |
| A.2 | Adds an explicit statement that allowances of ITS 3.0.2 (i.e., allowance for 25% extension to the SR Frequency) and ITS SR 3.0.3 (i.e., 24 hours to perform missed SR) are applicable to ITS 5.5.10, Explosive Gas and Storage Tank Radioactivity Monitoring Program. This maintains existing allowances in CTS 4.0.1 and CTS 4.0.2. | 4.0.1 4.0.2 4.10 | 5.5.10 3.0.2 SR 3.0.3 SR |
| ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.6 | 5.5.11 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.6 | 5.5.11 |
| ITS SPECIFICATION 5.5.12 – TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP) | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.4 | 5.5.14 |
| A.2 | Deletes CTS statements labeled "Objective" and "Applicability" because they do not establish any requirements and do not provide any guidance for the application of CTS requirements. | 4.4 | 5.5.14 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|--|--|
| A.3 | Consolidates various CTS requirements that containment leakage rate testing must be performed in accordance with 10 CFR 50 Appendix J, Option B, and Regulatory Guide 1.163 into a single statement. | 4.4.A.1.a 4.4.A.1.b 4.4.A.1.c 4.4.A.3 4.4.C.1 4.4.D.1.a | 5.5.14.a |
| A.4 | Adds reference to 10 CFR 50.54 (o) which requires that 10 CFR 50 Appendix J, is met to an existing requirement that 10 CFR 50 Appendix J, Option B, is met. | 4.4.A.1.b 4.4.A.3 4.4.C.1 4.4.D.1.a | 5.5.14.a |
| A.5 | Clarifies that the more restrictive acceptance criteria for Type B and C tests and not the acceptance criteria for the weld channel and penetration pressurization system sensitive leak rate test apply to components subject to Type B and C testing by 10 CFR 50, Appendix J. | 4.4.D.1.b 4.4.B.2 4.4.D.2.a 4.4.8.1 | 5.5.14.a 5.5.14.d.1 3.6.10.3 SR |
| A.6 | Clarifies that the IVSW leakage acceptance criteria and not the Type B and C testing leakage criteria applies to valves sealed by IVSW. | 4.4.D.1.c 4.4.D.2.a 4.4.D.2.c | 3.6.9.3 SR 5.5.14.d.1 5.5.14.d.3 |
| A.7 | Uses different terminology to explain that more restrictive acceptance criteria applies to the "as left" condition than applies to the "as found" containment leakage condition. | 4.4.A.2 | 5.5.14.d.1 |
| A.8 | Adopts terminology from 10 CFR 50, Appendix J, (i.e., Type A, Type B and Type C tests). | 4.4.A.2 4.4.D.2.a | 5.5.14.d.1 |
| A.9 | Clarifies that nothing in the Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J. | 4.4 | 5.5.14.f |
| ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS | | | |
| A.1 | Incorporates various editorial changes, reformatting, and revised numbering to make IP2 ITS consistent with NUREG-1431. | 4.13 6.13 6.16 6.6 6.9 | 5.6 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|--------------------|-------------|
| A.2 | Deletes statement that the types of records that must be retained and the minimum retention period for these records are described in the Quality Assurance Program Description (QAPD). | 6.10 | 5.6 |
| A.3 | Superceded by CTS Amendment 219. | NA | NA |
| A.4 | Clarifies that the annual Occupational Radiation Exposure Report required per 10 CFR 20, must include only deep dose exposures. | 6.9.1.4 | 5.6.1 |
| A.5 | Clarifies that electronic dosimeters may be used to measure exposures for the purpose of the annual Occupational Radiation Exposure Report. | 6.9.1.4 | 5.6.1 |
| A.6 | Changes the due date for the Annual Radiological Environmental Operating Report from May 1 to May 15 of each year. | 6.9.1.5 | 5.6.2 |
| A.7 | Adds clarification that the Radioactive Effluent Release Report is submitted in accordance with 10 CFR 50.36.a. | 6.9.1.6 | 5.6.3 |
| A.8 | Eliminates cross reference to the core operating limit Technical Specification associated with that document from the list of the documents approved by the NRC that describe the analytical methods used to determine the IP2 core operating limits. | 6.9.1.9 | 5.6.5 |
| A.9 | Not Used. | NA | NA |
| A.10 | Eliminates administrative requirement that operating statistics included in the Monthly Operating Report to the NRC must include all challenges to the PORVs or pressurizer safety valves because challenges to the PORVs or pressurizer safety valves fall within reporting requirements in 10 CFR 50.73. | 6.9.1.7 6.9.2.1 | 5.6.4 |

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---------------------------------|--------------------------|------------------------|------------------------|-----------------|
| | NONE | | | |

Indian Point - Unit 2

LA-1

Section 1.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 2.0 – SAFETY LIMITS (SLs)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|-----------------------------|---|--------------------|--------------------|-----------------|
| LA.1 | Relocates the Figure showing the limits on combinations of reactor power, reactor pressure and reactor temperature needed to ensure PCT and DNB are met to the Core Operating Limits Report (COLR). | 2.1 F 2.1-1 | 2.1.1 | Type 1 |
| LA.2 | Not Used. | NA | NA | |

Indian Point - Unit 2

LA-2

Section 2.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.0 – LCO APPLICABILITY AND SR APPLICABILITY

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|-------------------|-------------|-------------|----------|
| | NONE | | | |

Indian Point - Unit 2

LA-3

Section 3.0

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|----------------------------|------------------------|----------|
| ITS SECTION 3.1.1- SHUTDOWN MARGIN (SDM) | | | | |
| LA.1 | Relocates specific limits for shutdown margin from the Technical Specifications to the Core Operating Limits Report (COLR). | 3.10.1 F 3.10-1 | 3.1.1 | Type 1 |
| ITS SECTION 3.1.2 - CORE REACTIVITY | | | | |
| | NONE | | | |
| ITS SECTION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC) | | | | |
| | NONE | | | |
| ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS | | | | |
| LA.1 | Relocates requirements periodic testing of the rod deviation monitor and the compensatory action when this rod deviation monitor is not working to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.1.A). | 3.10.9 T 4.1-1, No.9 | 3.1.4 | Type 3 |
| LA.2 | Relocates the explanation of reason for the allowance that rod alignment limits are "Not required to be met for individual control rods until 1 hour after completion of control rod movement" to a licensee controlled document (i.e., Bases for SR 3.1.4.1). | 3.10.5.1 | 3.1.4.1 SR | Type 1 |
| ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS | | | | |
| | NONE | | | |
| ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS | | | | |
| | NONE | | | |
| ITS SECTION 3.1.7 - ROD POSITION INDICATION | | | | |
| | NONE | | | |
| ITS SECTION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2 | | | | |
| LA.1 | Relocates specific limits for shutdown margin from the Technical Specifications to the Core Operating Limits Report (COLR). | 3.10.1.1 F 3.10-1 | 3.1.8 LCO 3.1.1 LCO | Type 1 |

Indian Point - Unit 2

LA-4

Section 3.1

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|---|-------------|-------------|----------|
| LA.2 | Relocates descriptive details that physics tests are performed "to measure control rod worth and shutdown margin. For this test the reactor may be critical with all but one control rod inserted" to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR, Section 13.6.1). | 3.10.4.4 | 3.1.8.c LCO | Type 1 |

Indian Point - Unit 2

LA-5

Section 3.1

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|----------------------|----------------------------|----------|
| ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_o(Z)$) | | | | |
| LA.1 | Relocates to the ITS Bases the information that power distribution maps are made using the moveable detector system and that measured values of $FQ(Z)$ must be adjusted to include tolerances for manufacturing and measurement errors before the measured value is compared to the limit in the COLR. | 3.10.2.1 3.10.2.2 | 3.2.1.1 SR 3.2.1 LCO | Type 2 |
| ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (F_{AH}^N) | | | | |
| LA.1 | Relocates to the ITS Bases the information that power distribution maps are made using the moveable detector system and that measured values of $FN \Delta H$ must be adjusted to include measurement errors before the measured value is compared to the limit in the COLR. | 3.10.2.1 3.10.2.2 | 3.2.2.1 SR 3.2.2 LCO | Type 2 |
| ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD) | | | | |
| LA.1 | Relocates explanation that the target flux difference update required every 31 EFPDs is performed "by linear interpolation using the most recent measured value and a value of approximately 0 percent at the end of the cycle life" to the ITS Bases for SR 3.2.3.2. | 3.10.2.3 | 3.2.3.2 SR | Type 2 |
| LA.2 | Relocates CTS descriptions and limits already specified in COLR to the COLR. | 3.10.2 3.10.2.6.1 | 3.2.3 LCO | Type 1 |
| LA.3 | Relocates requirements for compensatory action if the instrumentation used to alarm non-conformance with the flux difference requirements and/or flux difference time requirements to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.F). | 3.10.2.8 | 3.2.3 LCO | Type 2 |
| ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR) | | | | |

Indian Point - Unit 2

LA-6

Section 3.2

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|---|--|-------------|----------|
| LA.1 | Relocates requirements for the quadrant power tilt monitor to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.2.A). | 3.10.3.4 3.10.10 T 3.5-2, No.14 | 3.2.4 LCO | Type 3 |

Indian Point - Unit 2

LA-7

Section 3.2

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-------------------------------|---|----------|
| ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION | | | | |
| LA.1 | Relocates design information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | T 3.5-2 T 3.5-3 T 3.5-4 | 3.3.1 LCO 3.3.2 LCO 3.3.3 LCO 3.3.5 LCO 3.3.6 LCO | Type 1 |
| LA.2 | Relocates the instruction that the cover plate on the rear of the safeguards panel in the control room shall not be removed without authorization from the Watch Supervisor to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.2.4.1.2). | 3.5.5 | 3.3.1 | Type 2 |
| LA.3 | Relocates remarks and clarification notes that explain the intent of RPS and ESFAS testing requirements to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | T 4.1-1 | 3.3.1 | Type 1 |
| LA.4 | Relocates details associated with the setpoint of Overtemperature delta T Function to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR, Section 7.2.5.1.5). | 2.3.1.B(4) | 3.3.1 | Type 1 |
| LA.5 | Relocates various cycle specific limits including design full power Tave and RCS pressure, limits and formulae for the adjustment of limits as a function of power for axial flux difference, trip functions constants associated with ITS 3.3.1, Function 5, Overtemperature delta T, and ITS 3.3.1, Function 6, Overpower delta T, from the Technical specifications to the Core Operating Limits Report (COLR). | 2.3.1.B(4) 2.3.1.B(5) | T3.3.1-1 #5 T3.3.1-1 #6 | Type 1 |
| ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION | | | | |
| LA.1 | Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | T 3.5-3 T 3.5-4 | 3.3.2 | Type 1 |
| LA.2 | Relocates the instruction that the cover plate on the rear of the safeguards panel in the control room shall not be removed without authorization from the Watch Supervisor to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.2.4.1.2) | 3.5.5 | 3.3.2 | Type 2 |

Indian Point - Unit 2

LA-8

Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|-----------------------------------|--|----------|
| LA.3 | Relocates remarks and clarification notes that are not directly related to the Operability of any RPS or ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases) | T 4.1-1 | 3.3.2 | Type 1 |
| ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION | | | | |
| LA.1 | Relocates alarm and/or indication instruments in CTS Table 3.5-5 (and associated surveillance requirements in CTS Table 4.1-1) for that are not RG 1.97, Type A or Category I to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.E and 3.3.G). | 3.5.6 T 3.5-5 | 3.3.3 | Type 2 |
| LA.2 | Relocates supporting information related to RG 1.97 Post Accident Monitoring Instruments to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | T 3.5-5, Note* T 3.5-5, Note** | 3.3.3 5.5.13 | Type 1 |
| LA.3 | Relocates Allowable Out of Service Times for RG 1.97 Post Accident Monitoring instrument recorder capability to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.G) because the recorder function is not an integral requirement for a RG 1.97 Type A instrument. | T3.5-5, Action1 | 3.3.3 RA-C.1 5.5.13 | Type 3 |
| ITS SECTION 3.3.4 – REMOTE SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION | | | | |
| LA.1 | Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases) | T 3.5-3, No.3a T 3.5-3, No.3b | 3.3.5 RA-A.1 3.3.5 RA-B.1 5.5.13 | Type 1 |
| LA.2 | Relocates periodic testing of the 480 V emergency bus undervoltage alarm to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.5.2.1.12) because alarms are attendant instrumentation requirements in the ITS definition of operability. | T 4.1-1, No.29c | 3.3.5.2 SR 3.3.5.3 SR 3.3.5.4 SR | Type 3 |

Indian Point - Unit 2

LA-9

Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|--------------------|---------------------|----------|
| ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION | | | | |
| LA.1 | Relocates information about the number of channels and the number of channels required to trip for each RPS and ESFAS Function to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | T 3.5-3 T 3.5-4 | 3.3.6 LCO 5.5.13 | Type 1 |
| ITS SECTION 3.3.7 - CONTROL ROOM VENTILATION SYSTEM (CRVS) ACTUATION INSTRUMENTATION | | | | |
| | NONE | | | |

Indian Point - Unit 2

LA-10

Section 3.3

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.4 – REACTOR COOLANT SYSTEM (RCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|--------------|-----------------------------------|----------|
| ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS | | | | |
| LA.1 | Relocates limits (i.e., acceptance criteria) for RCS temperature (Tave) and pressurizer pressure from the Technical Specifications to the Core Operating Limits Report (COLR). | 3.1.G | 3.4.1 LCO 5.6.5 LCO | Type 1 |
| ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS | | | | |
| LA.1 | Relocates details about the application of the RCS pressure and temperature limits to the Bases for ITS LCO 3.4.3. | 3.1.B 4.3 | 3.4.3 LCO 5.5.13 | Type 3 |
| LA.2 | Relocates information that heatup and cooldown rates are based on the average temperature over a one hour period and that limit lines for cooldown rates between those presented may be obtained by interpolation to the Bases for ITS LCO 3.4.3. | 3.1.B.1 | 3.4.3 LCO 3.4.3.1 SR 5.5.13 | Type 3 |
| ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2 | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3 | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4 | | | | |
| LA.1 | Not Used. | NA | NA | |
| ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED | | | | |
| LA.1 | Not Used. | NA | NA | |
| ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED | | | | |

Indian Point - Unit 2

LA-11

Section 3.4

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|------------------------|--------------------------|----------|
| | NONE | | | |
| ITS SPECIFICATION 3.4.9 - PRESSURIZER | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES | | | | |
| LA.1 | Relocates requirements needed to satisfy ASME Code for at least one pressurizer code safety valve or an opening greater than or equal to the size of one code safety valve flange when below the LTOP Applicability temperature to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.E). | 3.1.A.3.a 3.1.A.3.b | 3.4.10 LCO 3.4.12 LCO | Type 4 |
| LA.2 | Retains requirement for periodic verification of pressurizer safety valve settings but the required Frequency is relocated to the Inservice Test (IST) Program. | T 4.1-3, No.3 T 1-1 | 3.4.10.1 SR 5.5.6 | Type 4 |
| LA.3 | Not Used. CTS Table 4.1-1, Item 34, was relocated to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.F) by ITS 3.3.3, DOC LA.1. | NA | NA | |
| ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs) | | | | |
| LA.1 | Relocates requirements for periodic calibration of the PORV actuation and reclosure setpoints to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 4.3.4.3). | T 4.1-1, No.36 | 3.4.11 LCO | Type 3 |
| LA.2 | Relocates monitoring, testing and calibration of the position indication limit switches for the PORVs and block valves to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.G) and will be implemented by plant procedures. | T 4.1-1, No.32 | 3.4.11 LCO | Type 3 |
| LA.3 | Relocates information about the PORVs including the valve numbers and clarify that the block valves may be either open or closed to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for LCO 3.4.11). | 3.16.A.2 | 3.4.11 LCO | Type 1 |
| ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) | | | | |
| LA.1 | Not Used. | NA | NA | |
| LA.2 | Relocates requirements for testing of the PORV backup nitrogen system to a licensee document controlled by 10 CFR 50.59 (TRM 3.4.H). | 4.18.E | 3.4.12 | Type 3 |
| LA.3 | Not Used. | NA | NA | |
| LA.4 | Relocates description and requirements for channel Operability for the Power Operated Relief Valves (i.e., Overpressure Protection System (OPS) to a licensee document controlled by 10 CFR 50.59 (i.e., Bases for LCO 3.4.12). | T 3.5-3, No.5 | 3.4.12.a LCO 5.5.13 | Type 1 |
| ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE | | | | |

Indian Point - Unit 2

LA-12

Section 3.4

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|---------------------------|--------------------|----------|
| | NONE | | | |
| ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE | | | | |
| LA.1 | Relocates list of Event V PIVs to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and UFSAR 5.2). | 3.1.F.2.b.(1) | 3.4.14.1 SR 5.5.13 | Type 1 |
| LA.2 | Relocates details about how periodic verification of PIV leakage is performed to the ITS Bases for SR 3.4.14.1. | 3.1.F.2.b.(1) 4.16.A.5 | 3.4.14.1 SR 5.5.13 | Type 3 |
| ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION | | | | |
| LA.1 | Relocates requirement for a monthly visual inspection of the weirs used in the containment fan cooler condensate flow monitoring system to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Section 4.2.7). | T 4.1-1, No.21e | 3.4.15.3 SR | Type 3 |
| ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY | | | | |
| LA.1 | Relocates requirements for periodic measurement of tritium in the reactor coolant to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.K). | T 4.1-2, No.1 | 3.4.16 | Type 3 |

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.5 – EMERGENCY CORE COOLING SYSTEMS (ECCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|--|--|----------|
| ITS SPECIFICATION 3.5.1 - ACCUMULATORS | | | | |
| LA.1 | ITS maintains requirement that accumulator level and pressure must be maintained within limits; however, requirements for periodic calibration of accumulator level and pressure instruments are relocated to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3). | T 4.1-1, No.22a T 4.1-1, No.22b | 3.5.1.2 SR 3.5.1.3 SR 5.5.13 | Type 3 |
| ITS SPECIFICATION 3.5.2 - ECCS – OPERATING | | | | |
| LA.1 | Establishes ECCS requirements in terms of ECCS trains and the details about each of the ECCS subsystems and what constitutes a train is relocated to the ITS 3.5.2 Bases. | 3.3.A.2.d 3.3.A.2.e 3.3.A.2.f | 3.5.2 LCO | Type 1 |
| LA.2 | ITS maintains the requirement that ECCS hot leg injection valves (856B and 856F) are closed with motor operators de-energized; however, the implementing detail that "circuit breakers at the MCC must be locked out" is relocated to licensee controlled documents (i.e., Bases for SR 3.5.2.1). | 3.3.A.1.h | 3.5.2.1 SR 5.5.13 | Type 3 |
| LA.3 | Relocates implementing details regarding safety injection system test initial conditions, test performance and test acceptance criteria to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | 4.5.A.1.a 4.5.A.1.d | 3.5.2.4 SR 3.5.2.5 SR 3.5.2.6 SR | Type 3 |
| ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST) | | | | |
| | NONE | | | |

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.6 – CONTAINMENT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|---|--|-----------------|
| ITS SPECIFICATION 3.6.1 - CONTAINMENT | | | | |
| LA.1 | Relocates the requirement that the equipment door (hatch) must be properly closed as a condition of containment integrity to a licensee document controlled by 10 CFR 50.59 (i.e., Bases for ITS LCO 3.6.1). | 1.7 3.6.A.1 | 3.6.1 LCO 3.6.2 3.6.3 3.6.9 3.6.10 | Type 1 |
| ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES | | | | |
| LA.1 | Relocates lists of Containment Isolation Valves to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Table 5.2-1). (Superceded in part by Amendment 223.) | 1.7 3.6.A.1 4.4 T 3.6-1 T 4.4-1 | 3.6.3 | Type 1 |
| LA.2 | Not Used. | NA | NA | |
| LA.3 | Relocates acceptance criteria for closing times for containment purge supply and exhaust isolation valves and the pressure relief line isolation valves to a licensee document controlled by 10 CFR 50.59 (i.e., UFSAR, Section 5.2.4). | 3.6.3.2.a | 3.6.3.5 SR | Type 1 |
| LA.4 | Not Used. | NA | NA | |
| ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER UNIT (FCU) SYSTEM | | | | |

Indian Point - Unit 2

LA-15

Section 3.6

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-------------|-------------|----------|
| LA.1 | Relocates the description of how the fan cooler unit flow test is initiated to the ITS Bases. | 4.5.D.1 | 3.6.6.2 SR | Type 3 |
| ITS SPECIFICATION 3.6.7 - RECIRCULATION pH CONTROL SYSTEM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.10 - WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WCPPS) | | | | |
| LA.1 | Relocates the allowance " that the affected (inoperable) portion (of the WC&PPS) may be disconnected from the system if it is determined that it is not repairable by any practicable means" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases) | 3.3.D.2.C | 3.6.10 LCO | Type 3 |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.7 – PLANT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|------------------------|-------------|----------|
| ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs) | | | | |
| LA.1 | Retains requirement for periodic verification of main steam safety valve settings but the required Frequency is relocated to the Inservice Test (IST) Program. | T 4.1-3, No.4 | 3.7.1.1 SR | Type 4 |
| ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs) | | | | |
| LA.1 | Retains requirement for periodic verification of main steam isolation valve closure time but the required Frequency is relocated to the Inservice Test (IST) Program. | 4.7 | 3.7.2.1 SR | Type 4 |
| ITS SPECIFICATION 3.7.3 - MAIN FEEDWATER ISOLATION | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADVs) | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM | | | | |
| LA.1 | Not Used. | NA | NA | |
| LA.2 | Retains requirement for periodic verification of the capability of each auxiliary feedwater pump to deliver full flow but the required Frequency is relocated to the Inservice Test (IST) Program. | 4.8.A.2 | 3.7.5.2 SR | Type 4 |
| LA.3 | Relocates the requirement that an Operable AFW pump must be "capable of pumping a minimum 380 gpm" to the Bases for ITS 3.7.5. | 3.4.A.2 | 3.7.5 LCO | Type 1 |
| ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.7.7 - COMPONENT COOLING WATER (CCW) SYSTEM | | | | |
| LA.1 | Establishes CCW requirements in terms of CCW trains and relocates details about each of the CCW trains and what constitutes a train to the ITS 3.7.7 Bases. | 3.3.E.1.a 3.3.E.1.c | 3.7.7 LCO | Type 1 |
| ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM | | | | |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|--|--|----------|
| LA.1 | Relocates to the ITS Bases the information that isolation must be maintained between the essential and nonessential headers except as specified in a Note to the LCO 3.7.8 Applicability. | 3.3.F.3 | 3.7.8 RA-Note | Type 2 |
| ITS SPECIFICATION 3.7.9 - ULTIMATE HEAT SINK (UHS) | | | | |
| LA.1 | Relocates requirements for using specific instruments to monitor service water inlet temperature and the requirement for accelerated monitoring of UHS temperature whenever the UHS temperature is approaching the LCO limit of 95°F to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.C). | 3.3.F.5 T 4.1-1, No.45 | 3.7.9.1 SR | Type 3 |
| ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS) | | | | |
| LA.1 | Relocates the detail that the monthly test of the CRVS booster fans is performed "by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for SR 3.7.10.1). | 4.5.E.1 | 3.7.10.1 SR | Type 3 |
| ITS SPECIFICATION 3.7.11 - SPENT FUEL PIT WATER LEVEL | | | | |
| LA.1 | Relocates information that the required minimum level of 23 feet over the top of irradiated fuel assemblies seated in the storage racks corresponds to an elevation of 92' 2" to the LCO Section of the Bases for ITS LCO 3.7.11. | 3.8.C.2 | 3.7.11 LCO | Type 1 |
| ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE | | | | |
| LA.1 | Relocates description information in CTS 3.8.D.1.b (i.e., a description of information contained on CTS Figure 3.8-3) and CTS 3.8.D.1.d (i.e., a description of information contained on CTS Figure 3.8-1) to the ITS LCO 3.7.13 Bases. | 3.8.D.1.b 3.8.D.1.d F 3.8-1 F 3.8-3 | 3.7.13 LCO F 3.7.13-4 F 3.7.13-5 | Type 1 |
| ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY | | | | |
| | NONE | | | |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.8 – ELECTRICAL POWER SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|-------------------------------|-----------------|----------|
| ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING | | | | |
| LA.1 | Relocates requirement that Operability of two qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system requires at least two 138 kV lines from offsite sources into the Buchanan Substation to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). Additionally, relocates details about what constitutes a qualified circuits between the offsite transmission network and the onsite AC electrical power distribution system to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and IP2 UFSAR). | 3.7.A.1 3.7.A.2 3.7.A.3 | 3.8.1 LCO | Type 1 |
| LA.2 | Superceded by Amendment 218. | NA | NA | |
| LA.3 | Relocates the acceptance criteria that the DG must "assume the required load within 60 seconds after the initial start signal" and the test condition that "certain safeguards valves will be closed and made inoperable" to prevent Safety Injection flow to the core to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases and IP2 UFSAR 8.1.2.2). | 4.6.A.3 | 3.8.1.12 SR | Type 1 |
| ITS SPECIFICATION 3.8.2 - AC SOURCES - SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR | | | | |
| LA.1 | Relocates the clarification that the DG fuel oil reserve must be stored "at the Buchanan Substation, or onsite other than the normal supply tanks" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | 3.7.A.5 | 3.8.3 LCO | Type 2 |
| ITS SPECIFICATION 3.8.4 - DC SOURCES - OPERATING | | | | |
| LA.1 | Relocates the requirement that each battery shall have a "visual inspection of the plates" to the program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program." | 4.6.C.4 | 3.8.4 5.5.15 | Type 3 |
| ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN | | | | |

Indian Point - Unit 2

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Section 3.8

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-------------|------------------------------------|----------|
| | NONE | | | |
| ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS | | | | |
| LA.1 | Relocates requirement that each battery shall be subjected to a 24 hour equalizing charge every 3 months to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program"). | 4.6.C.2 | 3.8.6 5.5.15 | Type 3 |
| LA.2 | Relocates requirement that new data be compared with old to detect signs of abuse or deterioration every time surveillance data for batteries is recorded to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program"). | 4.6.C.3 | 3.8.6.2 SR 3.8.6.3 SR 5.5.15 | Type 3 |
| LA.3 | Relocates requirement that battery specific gravity is measured and recorded every month to a licensee document controlled by 10 CFR 50.59 (i.e., program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program"). | 4.6.C.1 | 3.8.6 | Type 3 |
| ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING | | | | |
| LA.1 | Relocates details about which buses are covered by ITS LCO 3.8.9 and the stipulation that specific bus tie breakers must be open to the Bases for ITS LCO 3.8.9, specifically Table B 3.8.9-1. | 3.7.A.4 | T B3.8.9-1 | Type 1 |
| ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN | | | | |
| | NONE | | | |

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Section 3.8

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|-------------------------|-------------|----------|
| ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION | | | | |
| LA.1 | Relocates limits for shutdown margin and/or boron concentration that must be maintained in Mode 6 from the Technical specifications to the Core Operating Limits Report (COLR). | 3.8.B.2 | 3.9.1 LCO | Type 1 |
| ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION | | | | |
| LA.1 | Relocates information that control room indication is a required attribute of Operability for the source range monitors when in Mode 6 to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases). | 3.8.A.2 | 3.9.2 | Type 2 |
| ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL | | | | |
| LA.1 | Relocates the requirement for periodic verification of the RHR pump flow instrumentation to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.B). | T 4.1-1, No.13 | 3.9.4.1 SR | Type 3 |
| ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL | | | | |
| LA.1 | Relocates the requirement for periodic verification of the RHR pump flow instrumentation to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.3.B). | T 4.1-1, No.13 T 1-1 | 3.9.5.1 SR | Type 3 |
| ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL | | | | |
| | NONE | | | |

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Section 3.9

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|---|--|----------------|----------|
| LA.1 | Relocates Maps Defining Unrestricted Areas of Radioactive Gaseous and Liquid Effluents to the Offsite Dose Calculation Manual (ODCM). | 5.1.B F 5.1-1 A F 5.1-1 B | 4.0 5.5.1 | Type 1 |
| LA.2 | Relocates descriptive information about the design and seismic qualification of the reactor containment, containment penetrations, and containment cooling systems to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 5.1.1). | 5.2.A 5.2.B 5.2.C 5.3.B 5.4.1 5.4.2 | 4.0 | Type 1 |
| LA.3 | Relocates the information that "each fuel rod shall have a nominal active fuel length of 144 inches" and that the silver-indium-cadmium alloy in control rods is 142 inches in length is relocated to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR Table 3.2-7). | 5.3.A.1 5.3.A.5 | 4.2.1 4.2.2 | Type 1 |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|--------------------|-------------|----------|
| ITS SPECIFICATION 5.1 - RESPONSIBILITY | | | | |
| LA.1 | Relocates specification that the corporate officer with direct responsibility for the plant is responsible for overall facility activities is relocated to a licensee document controlled by 10 CFR 50.59 (i.e., UFSAR, Section 12.1, Organization and Responsibility). | 6.1.1 6.1.2 | 5.1.1 | Type 1 |
| ITS SPECIFICATION 5.2 – ORGANIZATION | | | | |
| LA.1 | Superceded by CTS Amendments 231 and 235. | NA | NA | |
| LA.2 | Relocates CTS requirements that duplicate requirements imposed by 10 CFR 50.54 (m)(2) because requirements in 10 CFR 50 do not need to be repeated in the ITS. | 6.2.2.e T 6.2-1 | 5.2 | Type 4 |
| LA.3 | Relocates CTS requirements that duplicate requirements imposed by 10 CFR 50.54 (m)(2) because requirements in 10 CFR 50 do not need to be repeated in the ITS. | T 6.2-1 | 5.2 | Type 4 |
| ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS | | | | |
| LA.1 | Relocates requirement for a retraining and replacement training program for the plant staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55 to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 12.2). | 6.4.1 | 5.3 | Type 3 |
| ITS SPECIFICATION 5.4 – PROCEDURES | | | | |
| LA.1 | Relocates CTS 6.8.2 which is a statement that each procedure and administrative policy of CTS 6.8.1 and any changes to them shall be reviewed and approved for implementation in accordance with the quality assurance program described or referenced in the Updated FSAR. | 6.8.1 6.8.2 | 5.4 | Type 3 |
| LA.2 | Relocates the detail that Quality Assurance Program for effluent and environmental monitoring use "the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975" to the ODCM. | 6.8.1.d | 5.4 | Type 4 |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
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- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|--|------------------------------------|----------|
| ITS SPECIFICATION 5.5 – PROGRAMS AND MANUALS | | | | |
| ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM) | | | | |
| LA.1 | Relocates to the Offsite Dose Calculation Manual (ODCM) those CTS definitions for the following terms that are not used in the IP2 ITS but are used in the ODCM. | 1.0 | 5.5.1 | Type 2 |
| LA.2 | Relocates the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM). | 4.11 6.9.2.e 6.9.2.f | 5.5.1.c | Type 3 |
| ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT | | | | |
| LA.1 | Relocates testing details required for the implementation of ITS 5.5.2, Primary Coolant Sources Outside Containment, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 9.3.5). | 4.4.H Lic 2.L | 5.5.2 | Type 3 |
| ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM | | | | |
| LA.1 | Relocates the Process Controls Program, Solid Radioactive Waste, and Uranium Fuel Cycle Dose Commitment to the ODCM. | 1.18 1.21 3.9.D 4.10.C 4.10.D | 5.5.3 5.6 5.5.1 | Type 1 |
| LA.2 | Relocates compensatory actions and regulatory reporting requirements if limits for offsite doses resulting from the release of radioactive materials in liquid effluents are exceeded to the ODCM. | 3.9.A.1.b 3.9.A.3.b 3.9.A.4.b 3.9.B.1.b 3.9.B.3.b 3.9.B.4.b 3.9.B.5.b 3.9.C.2 4.10.A.1 4.10.E | 5.5.3.b 5.5.3.d 5.5.1 5.6 | Type 3 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|--|-------------|----------|
| LA.3 | Relocates specific requirements for Operability, Allowable values, surveillance testing, and compensatory actions for instrumentation used to monitor radioactive liquid and gaseous effluents to the ODCM and a licensee document controlled by 10 CFR 50.59 (i.e., IP2 TRM), as appropriate. | 3.9.A.2 3.9.B.2 T 3.9-1 T 3.9-2, No.3 T 3.9-2, No.4 T 3.9-2, No.5 T 4.10-2 T 4.10-4 | 5.5.3.a | Type 3 |
| LA.4 | Relocates specific details for the Radioactive Liquid and Gaseous Waste Sampling and Analysis Program to the Offsite Dose Calculation Manual (ODCM). | 4.10.A 4.10.B T 4.10-1 T 4.10-3 | 5.5.3.e | Type 3 |
| ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.5 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM | | | | |
| LA.1 | Not Used. | NA | NA | |
| ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP) | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM | | | | |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|---|----------------------------------|----------|
| LA.1 | Relocates specific requirements about which tanks are covered by the limits on radioactive content, actions if limits for explosive gas or radioactive material content are not met and requirements for periodic verification that limits are not being exceeded to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM). | 3.9.A.5 3.9.B.6 3.9.B.7 4.10.A.6 4.10.B.7 4.10.B.8 T 3.9-2, No.1 T 3.9-2, No.2 | 5.5.10.a 5.5.10.b 5.5.10.c | Type 3 |
| ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.12 - TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP) | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM | | | | |
| LA.1 | Relocates requirements to inspect the containment before testing, to close isolation valves by normal method before testing, to use required test medium, and to post test reporting requirements to the program established by Technical Specification 5.5.14, "Containment Leakage Rate Test Program." | 4.4.A.1.d 4.4.A.1.e 4.4.F 4.4.G | 5.5.14 | Type 3 |
| LA.2 | Recognizes that requirement for repressurization of air lock seals following any opening of an air lock door is part of the program required by ITS 5.5.14 and a condition of Operability of the airlocks with appropriate clarification provided in the Bases. | 4.4.C.2 | 5.5.14 3.6.2 | Type 3 |
| ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS | | | | |
| LA.1 | Eliminates requirements that duplicate 10 CFR 50.73. | 6.6 | 5.6 | Type 4 |
| LA.2 | Relocates requirement for a Startup Report to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 13.6.2). | 6.9.1.1 6.9.1.2 | 5.6 | Type 3 |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|---|------------------|----------------|----------|
| LA.3 | Relocates details about what is included in the Annual Radiological Environment Operating Report to the Offsite Dose Calculation Manual (ODCM). | 6.9.1.5 | 5.6.2 | Type 3 |
| LA.4 | Relocates details about what is included in the annual Radiological Effluent Release Report to the Offsite Dose Calculation Manual (ODCM). | 6.9.1.6 | 5.6.3 5.5.1 | Type 3 |
| LA.5 | Relocates requirement that major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Annual Radioactive Effluent Release Report to the Offsite Dose Calculation Manual (ODCM) (i.e., dose assessment and reporting requirements). | 6.16 | 5.6 5.5.1 | Type 3 |
| LA.6 | Not Used. | NA | NA | |
| LA.7 | Relocates description of the design requirements and record keeping requirements for Environmental Qualification to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR 7.1.3). | 6.13.1 6.13.2 | 5.6 5.5.13 | Type 1 |

Categories for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|--|--------------------------|--------------------|----------|
| L.1 | Allows use of Table E-7 of Regulatory Guide 1.109 or ICRP 30, Supplement to Part 1, in addition to Table III of TID-14844 for thyroid dose conversion factors used in analysis of potential offsite doses. | 1.14 | 1.1 | |
| L.2 | Increases the power level where Mode 1 LCOs become applicable from 2% RTP to 5% RTP. | 1.2.4 | 1.1 T 1.1-1 | V |
| L.3 | Revises definition of E (bar) (i.e., Average Disintegration Energy) to exclude I-135 and include tritium when calculating of E-Bar and when measuring gross specific activity. | 3.1.D.1 T 4.1-1, No.1 | 1.1 3.4.16.1 SR | |

Indian Point - Unit 2

L-1

Section 1.0

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|--|---|-------------|----------|
| L.1 | <p>Deletes statement that 10 CFR 50.36(c)(1)(i) requirements must be met following a Safety Limit violation.</p> <p>Deletes specific details for internal IP2 reviews of Licensee Event Reports prior to the submittal to the NRC.</p> | <p>6.7.1.a</p> <p>6.7.1.b</p> <p>6.7.1.c</p> <p>6.7.1.d</p> | 2.2 | VI |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS
ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|--|-------------|------------------------|----------|
| L.1 | Permits restoration of inoperable equipment to an operable status to demonstrate the Operability of the equipment being returned to service or to demonstrate that other equipment or variables are within limits. | 3.0 | 3.0.5 LCO 3.0.2 LCO | V |
| L.2 | Permits an increase in the time allowed to complete a missed surveillance, from a maximum of 24 hours, up to a maximum period equal to the specified surveillance interval. | 4.0.2 | 3.0.3 SR | III |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|--------------------------------------|--|----------|
| ITS SECTION 3.1.1- SHUTDOWN MARGIN (SDM) | | | | |
| L.1 | Deletes requirement for verification of reactor coolant system boron concentration twice per week the new requirement in ITS SR 3.1.1.1 for verification of shutdown margin every 24 hours when shutdown and the requirements in ITS SR 3.1.5.1 and ITS SR 3.1.6.2 for verification of rod insertion limits every 12 hours will ensure that boron concentration is verified within required limits more frequently than the CTS requirement. | T 4.1-2, No.2 | 3.1.1.1 SR 3.1.5.1 SR 3.1.6.2 SR 3.9.1.1 SR | |
| ITS SECTION 3.1.2 - CORE REACTIVITY | | | | |
| | NONE | | | |
| ITS SECTION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC) | | | | |
| L.1 | Allows 24 hours to restore MTC within required limits by inserting control banks until MTC is within required limit. | 3.1.C.1 | 3.1.3 RA-A.1 3.1.3 RA-B.1 | III |
| ITS SECTION 3.1.4 - ROD GROUP ALIGNMENT LIMITS | | | | |
| L.1 | Allows 72 hours to verify that a misaligned rod has not resulted in exceeding power distribution limits because ITS LCO 3.1.4, Required Action B.2.2, requires that reactor power be reduced within 2 hours. | 3.10.5.1.a 3.10.5.1.b 3.10.5.2 | 3.1.4 RA-B.2.2 3.1.4 RA-B.2.4 3.1.4 RA-B.2.5 | III |
| L.2 | Requires a reduction in reactor power (but not a reduction in the high flux trip setpoint) within 2 hours when a rod is not within required alignment limits. | 3.10.5.2 | 3.1.4 RA-B.2.2 | IV |

Indian Point - Unit 2

L-4

Section 3.1

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|--------------------|---|----------|
| L.3 | Superceded by CTS Amendment 217. | NA | NA | |
| L.4 | Superceded by CTS Amendment 234. | NA | NA | |
| L.5 | Superceded by CTS Amendment 234. | NA | NA | |
| ITS SECTION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS | | | | |
| L.1 | Deletes a statement that SDM requirements must be met during the surveillance for periodic exercise of individual rods because the impact on SDM of moving individual or small groups of control rods by 10 steps is small, the SR is performed infrequently (92 days), and the duration of the test is short. | 3.10.1 3.10.4.4 | 3.1.5 LCO 3.1.4.2 SR 3.1.5 RA-A.1.1 3.1.5 RA-A.1.2 | II |
| ITS SECTION 3.1.6 - CONTROL BANK INSERTION LIMITS | | | | |
| L.1 | Deletes a statement that SDM requirements must be met during the surveillance for during periodic exercise of individual rods because the impact on SDM of moving individual or small groups of control rods by 10 steps is small, the SR is performed infrequently (92 days), and the duration of the test is short. | 3.10.1 3.10.4.4 | 3.1.6 LCO 3.1.4.2 SR 3.1.6 APP | II |
| ITS SECTION 3.1.7 - ROD POSITION INDICATION | | | | |

Indian Point - Unit 2

L-5

Section 3.1

Categories for L-Table

- I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions
 II - Relaxation of Surveillance Requirement V - Relaxation of LCO
 III - Relaxation of Completion Time VI - Relaxation of Reporting Requirement

| | | | | |
|--|---|--------------------|--|----------|
| L.1 | Allows more than one IRPI channel per bank to be inoperable for 24 hours if rod control is placed in manual and reactor coolant system temperature is verified every hour. | 3.10.6.2 | 3.1.7 RA-A.1 3.1.7 RA-A.2 3.1.7 RA-B.1 3.1.7 RA-B.2 3.1.7 RA-B.3 3.1.7 RA-B.4 | IV |
| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
| L.2 | Establishes Required Actions allowing continued plant operation if one or more banks of the rod Demand Position Indication System are not Operable in Modes 1 and 2. | 3.10.6 3.10.5.1 | 3.1.7 RA-D.1.1 3.1.7 RA-D.1.2 3.1.7 RA-D.2 | IV |
| L.3 | Allows 12 hours to verify rod position using incore detectors or to reduce power to less than 50% power without taking any other compensatory action when one IRPI per group in one or more groups is inoperable. | 3.10.6.1.b | 3.1.7 RA-A.2 3.1.7 RA-C.1 3.1.7 RA-C.2 | IV |
| ITS SECTION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2 | | | | |
| | NONE | | | |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|---------------------|--|----------|
| ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_o(Z)$) | | | | |
| L.1 | Extends the completion time for a proportional reduction of the high neutron flux trip setpoint whenever a hot channel factor exceeds its specified limit from the several hours that would be needed to perform the required adjustment of setpoints under CTS to the 72 hours allowed by ITS. | 3.10.2.2.2 | 3.2.1 RA-A.2 | III |
| L.2 | Relaxes requirement for performing a flux map after a determination that hot channel factors were exceeded so performing a flux map is required only as a prerequisite before increasing thermal power above the limit imposed when hot channel factors were exceeded. | 3.10.2.2.2 | 3.2.1 RA-A.1 3.2.1 RA-A.2 3.2.1 RA-A.3 3.2.1 RA-A.4 | IV |
| L.3 | Adds an explicit requirement that the plant be placed in a condition where the LCO does not apply within a reasonable period of time if the Actions or Completion Times are not met when FQ(Z) limits are exceeded. | 3.10.2.2.2 3.0.1 | 3.2.1 RA-B.1 | III |
| L.4 | Relaxes Applicability requirements for peaking factors ($FQ(Z)$) from "at all times" to only when in Mode 1 because in other Modes there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power. | 3.10.2.1 | 3.2.1 APP | I |

Indian Point - Unit 2

L-7

Section 3.2

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|----------------------------------|--|----------|
| ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (F_{AH}^N) | | | | |
| L.1 | Eliminates CTS requirement for a reactor shutdown if FN delta H is not restored to within limits by a reduction to 50% RTP; ITS only requires that the plant be placed outside the LCO Applicability. | 3.10.2.2.2 | 3.2.2 RA-A.1.2.1 3.2.2 RA-A.1.2.2 3.2.2 RA-A.2 3.2.2 RA-B.1 | IV |
| L.2 | Relaxes Applicability requirements for peaking factor, Nuclear Enthalpy Rise Hot Channel Factor (FN delta H), from "at all times" to only when in Mode 1 because in other Modes is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power. | 3.10.2.1 | 3.2.2 APP | I |
| ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD) | | | | |
| L.1 | Allows use of design predictions for target flux difference during the first 31 EFPDs following refueling (i.e., target flux difference is not determined using a flux map until 31 EFPDs following refueling). | 3.10.2.3 | 3.2.3.3 SR | II |
| L.2 | Eliminates the requirement for a reduction in the high flux trip setpoint in conjunction with a required reduction in reactor power after a determination that AFD is not within the specified limit. | 3.10.2.6.2 | 3.2.3 RA-C.1 | IV |
| L.3 | Eliminates requirement to accumulate AFD penalties when < 15% RTP. | 3.10.2 3.10.2.7 3.10.2.7.2 | 3.2.3 APP 3.2.3 LCO 3.2.3 RA-C.1 | V |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|--------------------------|--|----------|
| ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR) | | | | |
| L.1 | Eliminates the requirement for a proportional reduction in the high flux trip setpoint in conjunction with a required reduction in reactor power after a determination that QPTR is not within the specified limit. | 3.10.3.1.a | 3.2.4 RA-A.1 | V |
| L.2 | Eliminates requirement to reduce power < 50% RTP if QPTR exceeds 1.09 because the requirement for power reduction of 3% RTP for each 1% by which the QPTR exceeds 1.00 provides a very high degree of assurance that the quadrant power tilt is not causing any area of the core to exceed a thermal limit. | 3.10.3.1 3.10.3.2 | 3.2.4 RA-A.1 | IV |
| L.3 | Eliminates requirement (in CTS Bases) to use "full-core physics map utilizing the movable detector system" (i.e., allows use of excore detectors) to verify QPTR is within limits following a power reduction that was required to compensate for QPTR not within required limits. | 3.10.3.1.a 3.10.3.1.b | 3.2.4 RA-A.2 3.2.4.1 SR | IV |
| L.4 | Establishes a process that allows returning to 100% RTP following a power reduction that was required to compensate for QPTR not within required limits. | 3.10.3.1.a | 3.2.4 RA-A.4 3.2.4 RA-A.5 3.2.4 RA-A.6 | |
| L.5 | Extends time allowed to reduce power to < 50% RTP when QPTR limits are exceeded and associated Actions or completion times are not met from 2 hours to 4 hours. | 3.10.3.1.b | 3.2.4 RA-B.1 | III |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.3- INSTRUMENTATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|--------------------------------|---|----------|
| ITS SPECIFICATION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION | | | | |
| L.1 | Replaces the nominal trip setpoint limiting safety system setting (i.e., the as-left setpoint) for all of the Reactor Protections System functions with an "Allowable Value" that was calculated using a methodology consistent with Part I of ISA-S67.04-1994, "Setpoints for Nuclear Safety-Related Instrumentation" and Regulatory Guide 1.105, "Setpoints for Safety-related Instrumentation." | 2.3.1 | T 3.3.1-1 No.2b T 3.3.1-1 No.5 T 3.3.1-1 No. 6 T 3.3.1-1 No.7a T 3.3.1-1 No.7b T 3.3.1-1 No.8 T 3.3.1-1 No.9 T 3.3.1-1 No.11 T 3.3.1-1 No.12 T 3.3.1-1 No.13 | V |
| L.2 | Not Used. | NA | NA | |
| L.3 | Superceded by Amendment 212. | NA | NA | |
| L.4 | Eliminates the requirement for ITS 3.3.1, Function 3, Intermediate Range Neutron Flux, to be Operable when below the P-6 interlock setpoint (i.e., when the source range trip is required to be Operable). | T 3.5-2, No.3 | T 3.3.1-1 No. 3 | V |
| L.5 | Eliminates requirement that the Channel Operational Test for the Source Range (SRM) and Intermediate Range (IRM) Trip be performed within 7 days prior to a reactor startup if the Surveillance has been performed within the Frequency justified by WCAP-15376 if both SRM or IRM channels are Operable; however, if only 1 IRM or SRM channel is Operable (as permitted by CTS Table 3.5-2, Function 4, and ITS Table 3.3.1-1, Functions 3 and 4), the allowance provided by WCAP-15376 does not apply and the required Surveillance Frequency remains at 7 days. | T 4.1-1, No.2 T 4.1-1, No.3 | 3.3.1.8 SR 3.3.1.7 SR T 3.3.1-1 No. 3 T 3.3.1-1 No. 4 | II |
| L.6 | Increases Surveillance Frequency for comparing the AFD as determined by the incore detectors and the AFD as determined by the NIS channel from monthly to every 31 effective full power days. | T 4.1-1, No.1 | 3.3.1.3 SR | II |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|---|--------------------------------|--|----------|
| L.7 | Allows 48 hours to restore the inoperable undervoltage or shunt trip mechanism for a reactor trip breaker to operable before requiring the actions for a loss of reactor trip capability. | T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-S.1 | III |
| L.8 | Allows 48 hours to restore an inoperable RTB when in Modes 3, 4 or 5 when the rod control system is capable of rod withdrawal or if one or more rods are not fully inserted. | T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-C.2.1 | III |
| L.9 | Decreases Surveillance Frequency for the comparison of the upper and lower axial offset from monthly to every 92 effective full power days. | T 4.1-1, No.1 | 3.3.1.6 SR | II |
| L.10 | Establishes an explicit delay in SRs for comparing heat balance calibrations to nuclear instrument output, comparing incore detector measurements to NIS AFD, and comparing incore and excore detectors of the Nuclear instruments to allow minimum plant conditions to be established for performing the SR and sufficient time to complete the SR once minimum conditions are met. | T 4.1-1, No.1 | 3.3.1.2 SR 3.3.1.3 SR 3.3.1.6 SR | II |
| L.11 | Increases the Completion Times for restoring an inoperable Reactor Trip Breaker (RTB) train from 1 hour to 24 and establishes a 4 hour limit on the amount of time that an RTB train may be bypassed for Surveillance Testing consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1. | 1.5 3.5.3 T 3.5-2, No.19 | 3.3.1 RA-P.1 | III |
| L.12 | Increases required Surveillance test frequencies for RPS as follows: Channel Operational Test Frequency is increased from 92 days to 184 days; Actuation Logic Test Frequency is increased from 31 to 92 days on a staggered test basis; and Trip Actuating Device Operational Test Frequency is increased from 31 to 62 days on a staggered test basis. These changes are consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1. | 3.5 4.1 | 3.3.1 | II |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|-------------------|-------------|-------------|----------|
|----------------------|-------------------|-------------|-------------|----------|

Indian Point - Unit 2

L-11

Section 3.3

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION | | | | |
|--|--|---------|----------------|-------|
| L.1 | Replaces the nominal trip setpoint limiting safety system setting (i.e., the as-left setpoint) for all of the Engineered Safety Feature Actuation System (ESFAS) Instrumentation functions with an "Allowable Value" that was calculated using a methodology consistent with Part I of ISA-S67.04-1994, "Setpoints for Nuclear Safety-Related Instrumentation" and Regulatory Guide 1.105, "Setpoints for Safety-related Instrumentation." | T 3.5-1 | 3.3.2 | V |
| L.2 | Not Used. | NA | NA | |
| L.3 | Not Used. | NA | NA | |
| L.4 | <p>Changes Applicability and Required Actions to eliminate Mode 4 requirements for the following ESFAS functions:</p> <p>ITS 3.3.2, Function 1.c, Safety Injection-Containment Pressure-High; ITS 3.3.2, Function 1.e. Safety Injection-High Differential Pressure Between Steam Lines; ITS 3.3.2, Function 1.f. Safety Injection - High Steam Flow in Two Steam Lines Coincident with Tave - Low; ITS 3.3.2, Function 2.c, Containment Spray - Containment Pressure (High-High); ITS 3.3.2, Function 3.b.(3), Containment Phase B Isolation-Containment Pressure (High-High); ITS 3.3.2, Function 4.a Steam Line Isolation-Manual Initiation; ITS 3.3.2, Function 4.b, Steam Line Isolation-Automatic Actuation Logic and Actuation Relays; ITS 3.3.2, Function 4.c, Steam Line Isolation - Containment Pressure (High-High); ITS 3.3.2, Function 4.d. Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Tave - Low; ITS 3.3.2, Function 4.e. Steam Line Isolation - High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure - Low; ITS 3.3.2, Function 5.a, Feedwater Isolation-Automatic Actuation Logic and Actuation Relays; and ITS 3.3.2, Function 6.a, Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays.</p> | 3.5.1 | 3.3.2 3.3.6 | I, IV |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|-------------------------------------|--|----------|
| L.5 | Not Used | NA | NA | |
| L.6 | Changes required Surveillance test frequencies for ESFAS as follows: Channel Operational Test Frequency is increased from 92 days to 184 days; Actuation Logic Test Frequency is increased from 31 to 92 days on a staggered test basis. These changes are consistent allowances justified in WCAP-15376-P-A, Rev.0, Risk Informed Assessment of RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times, as implemented by TSTF-411, Rev.1. | 3.5 | 3.3.2 | II |
| ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION | | | | |
| L.1 | Extends the amount of time that one of the two required Channels of Containment Hydrogen Concentration Monitor may be inoperable before a report to the NRC must be initiated from 7 days to 30 days and eliminates the explicit requirement for initiation of alternate monitoring methods while the required monitoring channel is inoperable. | T 3.5-5, No.11 T 3.5-5, Action 3 | 3.3.3, Function 10 3.3.3 RA-A.1 | III |
| L.2 | Reduces the number of Containment Pressure (narrow range) channels needed to satisfy Reg. Guide 1.97 requirements for Post Accident Monitoring from 6 channels to 2 channels. | T 3.5-5 T 3.5-3 | 3.3.3, Function 7 3.3.3, Function 8 | V |
| L.3 | Reduces the number of Core Exit Temperature (CETs) needed to satisfy Reg. Guide 1.97 requirements for Post Accident Monitoring from 65 channels to 2 CETs per train (i.e., 4 CETs total) in each of the four quadrants. | T 3.5-5 | 3.3.3, Function 15 3.3.3, Function 16 3.3.3, Function 17 3.3.3, Function 18 | V |
| L.4 | Increases the required channel Check Frequency of the Reg. Guide 1.97 Post Accident Monitoring portion of the RWST Level indication from weekly to every 31 days. | T 4.1-1, No.15 3.3.A.1.k | 3.3.3.1 SR 3.5.4.4 SR 3.3.2 | II |
| L.5 | Increases the required Frequency for Channel Checks of the Post Accident Monitoring Function High Range Containment Radiation Monitor (R-25, R-26) from every 12 hours to every 31 days. | T 4.1-1, No.40 | 3.3.3.1 SR | II |
| L.6 | Deletes requirement that "steam tables are continuously maintained in the control | T 3.5-5, No.2 | 3.3.3, Function | IV |

Indian Point - Unit 2

L-13

Section 3.3

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|---|---|----------|
| ITS SECTION 3.3.4 – REMOTE SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION | | | | |
| L.1 | Replace the nominal trip setpoint limiting safety system setting (i.e., the as-left setpoint) for the 480 V bus undervoltage and degraded voltage functions with an "Allowable Value" (i.e., as-found setpoint) as the Limiting Safety System Setting. | T 3.5-1, No.8a T 3.5-1, No.8b 2.3.1 | 3.3.5 LCO 3.3.1, No. 2b 3.3.1, No. 5 3.3.1, No. 6 3.3.1, No. 7a 3.3.1, No. 7b 3.3.1, No. 8 3.3.1, No. 9 3.3.1, No. 11 3.3.1, No. 12 3.3.1, No. 13 | V |
| L.2 | Revises Required Action for a loss of the undervoltage function on one or more buses from a requirement for an immediate reactor shutdown to a requirement to declare the associated DGs inoperable because the impact of a loss of the undervoltage function on a 480 V bus is the loss of automatic start capability for the associated DG. | T3.5-3, No.3a | 3.3.5 3.3.2 RA-H.1 | IV |
| ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION | | | | |
| L.1 | Eliminates Technical Specification requirements for Containment Purge System and Pressure Relief Line Isolation instrumentation during refueling operations except during movement of recently irradiated fuel within the containment with the term "recently" defined in the ITS Bases as fuel assemblies that has been part of a critical reactor in the previous 100 hours. These relaxations were evaluated and accepted by the NRC based on an evaluation documented in the Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000. | 3.8.A.1 3.8.B.4 | 3.3.6 | I |
| L.2 | Not Used. | NA | NA | |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|--------------------|--------------|----------|
| ITS SECTION 3.3.7 - CONTROL ROOM VENTILATION SYSTEM (CRVS) ACTUATION INSTRUMENTATION | | | | |
| L.1 | Deletes implied requirement that the control room ventilation system, including actuation instrumentation, must be operable whenever containment integrity is required (except during movement of irradiated fuel assemblies) based on Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000. | 3.3.H.1 | 3.3.7 | I |
| L.2 | Eliminates requirement for reactor shutdown when requirements for CRVS actuation instrumentation are not met and not restored within a specified completion time the CRVS is placed in the filtered pressurization mode (i.e., the status that would result from actuation). | 3.3.H.1 3.3.H.2 | 3.3.7 RA-A.1 | IV |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.4 – REACTOR COOLANT SYSTEM (RCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|------------------------|--------------|----------|
| ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS | | | | |
| L.1 | Allows 2 hours to restore RCS flow to the minimum value of 331,840 gpm before power reduction to Mode 2 must be initiated if the RCS minimum flow is not within limits. | 3.0.1 3.1.G | 3.4.1 RA-A.1 | III |
| L.2 | Allows entry into MODE 1 without having performed the 24 month verification of RCS total flow using a precession heat balance to allow placement of the unit in the best condition for performing the SR. | 3.1.G T 4.1-1, No.5 | 3.4.1.4 SR | I |
| ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY | | | | |
| L.1 | Eliminates the requirement that the reactor be made subcritical "by an amount greater than the potential reactivity insertion due to depressurization" and requires only that the reactor be made subcritical. | 3.1.C.3 | 3.4.2 RA-A.1 | III |
| ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2 | | | | |
| | NONE | | | |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3 | | | | |
|--|--|--------------|--|----------|
| L.1 | Allows one hour to restore the required RCS loop to operation or open the reactor trip breakers if only one of two required RCPs is operating. | T 3.1.A-1(1) | 3.4.5 RA-C.1 3.4.5 RA-C.2 3.4.5 RA-D.1 | III |
| L.2 | Relaxes Applicability and Required Action for having 2 RCPs in operation in Mode 3 from "reactor trip breakers open" to "Rod Control System not capable of rod withdrawal" which permits use of either RTBs in the open position or the CRDMs de-energized to eliminate the potential for an inadvertent rod withdrawal. | T 3.1.A-1(1) | 3.4.5 LCO | V |
| L.3 | Relaxes Completion Time to reduce RCS temperature < 350°F (i.e., Mode 4) to 12 hours when a required inoperable RCP is not restored to operable within the 72 hour allowable out of service time. | T 3.1.A-1(1) | 3.4.5 RA-B.1 | III |
| L.4 | Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements. | T 3.1.A-1(1) | 3.4.5 LCO Note a | V |
| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
| ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4 | | | | |
| L.1 | Extends the amount of time allowed to reach cold shutdown from 20 hours to 24 hours when in Mode 4 and only one RHR pump is Operable and in operation and no RCPs are Operable. | T 3.1.A-1(2) | 3.4.6 RA-A.2 | III |
| L.2 | Eliminates the requirement that the plant be placed in cold shutdown within a specified time when only one RCP is Operable and in operation and no RHR pumps are Operable because this action may not be practical or possible when only one RCP is Operable and in operation and no RHR pumps are Operable. Requirement to initiate action immediately to restore redundant decay heat removal and RCS circulation capability is substituted. | T 3.1.A-1(2) | 3.4.6 RA-A.1 | IV |
| L.3 | Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements. | T 3.1.A-1(2) | 3.4.6 LCO Note a | V |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED | | | | |
|--|---|------------------------------|---|-----|
| L.1 | Adds Note 2 which allows one RHR loop to be inoperable for testing for a period of up to 2 hours, provided that the other RHR loop is Operable and in operation. | T 3.1.A-1(3) | 3.4.7 LCO Note 2 | III |
| L.2 | Allows use of one RHR loop and two SGs and natural circulation as a backup to satisfy requirements for redundant decay heat removal systems in cold shutdown versus CTS requirement for two RHR loops. | T 3.1.A-1(3) T 3.1.A-1(4) | 3.4.7 LCO | V |
| L.3 | Adds Note 4 which allows both RHR loops to be removed from operation during planned heatup to Mode 4 when at least one RCS loop is in operation. | 3.1.A | 3.4.7 LCO Note 4 | V |
| L.4 | Eliminates requirement that RCS temperature and neutron source range are monitored hourly when the alternate means of decay heat is used (i.e., steam generators on natural circulation) because ITS allows this option only when the required operating RHR pump fails and activities involving a reduction in RCS boron concentration are prohibited when using steam generators on natural circulation for decay heat removal. | T 3.1.A-1(3) T 3.1.A-1(4) | 3.4.7 LCO 3.4.7 RA-B.1 3.4.7 RA-B.2 | V |
| L.5 | Allows RCS boron concentration to be reduced when there is no forced flow in the reactor as long as the coolant being injected has a boron concentration greater than the boron concentration required to meet minimum SDM requirements. | T 3.1.A-1(4) | 3.4.7 LCO Note 1a | V |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|----------------|-------------|----------|
| ITS SPECIFICATION 3.4.9 - PRESSURIZER | | | | |
| L.1 | Relaxes the upper limit for pressurizer level from at "normal water level" to less than or equal to 60.6% which is the pressurizer level used as analytical limit for the initial condition in the analysis of the events that result in pressurizer surge (e.g., loss of normal feedwater and the loss of load/turbine trip). Eliminates the implied lower limit for pressurizer level at "normal water level." | 3.1.C.4 2.3 | 3.4.9.a LCO | V |
| ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs) | | | | |
| | NONE | | | |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| ITS SPECIFICATION 3.4.12 - LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) | | | | |
|---|---|--|---|-----|
| L.1 | Specifies that the CTS requirement to immediately take action to place the plant in a condition where PORVs are not required means that the plant be depressurized and an appropriate size vent established within 8 hours. | 3.1.A.4.b | 3.4.12 RA-E.1 3.4.12 RA-E.2 | III |
| L.2 | Superseded by Amendment 224. | NA | NA | |
| L.3 | Superseded by Amendment 224. | NA | NA | |
| ITS SPECIFICATION 3.4.13 - RCS OPERATIONAL LEAKAGE | | | | |
| L.1 | Provides additional 4 hours to attempt to restore primary to secondary leakage to within limits and, if unsuccessful, extends the time allowed to reach cold shutdown from 24 hours to 36 hours. | 3.1.F.2.a.(1) | 3.4.13 RA-A.1 3.4.13 RA-B.1 3.4.13 RA-B.2 | III |
| L.2 | Decreases frequency for verification that RCS Operational leakage is within limits using an RCS Water Inventory from once per 24 hours to once per 72 hours. Specifies that this verification is not required to be performed until after 12 hours of steady state operation because a water inventory requires steady state operation. | 3.1.F.2.c.(1)(b) 3.1.F.2.c.(1)(c) 4.16.A.4 | 3.4.13.1 SR | II |
| L.3 | Superseded by Amendment 226. | NA | NA | |
| L.4 | Deletes requirement that if the reactor is shutdown to investigate steam generator tube leakage and/or to plug or otherwise repair a leaking tube, then IP2 must inform the NRC before the SG is restored to service. | 3.1.F.2.(3) | 3.4.13 | IV |

Categories for L-Table

I - Relaxation of Modes of Applicability
 II - Relaxation of Surveillance Requirement
 III - Relaxation of Completion Time
 IV - Relaxation of Required Actions
 V - Relaxation of LCO
 VI - Relaxation of Reporting Requirement

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|--------------------------------|--|----------|
| ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE | | | | |
| L.1 | Allows operation to continue with one or both pressure isolation valves for the RCS/RHR interface to exceed required leakage limits if both of the following Actions are met: the leakage path must be isolated within 4 hours using a valve in the RCS pressure boundary or the high pressure portion of the system which meets the leakage limits; and, both valves in the flow path are restored to meet leakage limits within 72 hours. | 3.1.F.2.b.(1) 3.1.F.2.b.(2) | 3.4.14 RA-A.1 3.4.14 RA-A.2 | III |
| L.2 | Extends the time allowed to place the plant in cold shutdown (i.e., Mode 5) from 24 hours to 36 hours when limits for RCS/RHR leakage are not met. | 3.1.F.2.b.(1) 3.1.F.2.b.(2) | 3.4.14 RA-A.1 3.4.14 RA-A.2 3.4.14 RA-B.1 3.4.14 RA-B.2 | III |
| L.3 | Deletes requirement that RCS/RHR PIV leakage be tested whenever the RCS pressure decreases to 700 psig (i.e. within 100 psig of the RHR design pressure) or whenever the RHR is secured to go to hot shutdown and replaces it with a new requirement that testing for gross leakage must be performed within 24 hours following any valve actuation due to automatic or manual action or after any flow through the valve. | 4.16.B | 3.4.14.1 SR | V |
| L.4 | Allows entering Modes 3 and 4 without completing required RCS/RHR pressure isolation valve leakage surveillance so that the necessary differential pressures and stable conditions needed for performance of this Surveillance can be established. | 4.16.A.5 | 3.4.14.1 SR | V |
| L.5 | Extends the length of a shutdown that requires leakage testing be performed for the RCS/RHR pressure isolation valves from 72 hours to 7 days. | 4.16.A.5 | 3.4.14.1 SR | III |

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|---|--|----------|
| ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION | | | | |
| L.1 | Superseded by TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints." | NA | NA | |
| L.2 | Extends the time allowed to reach Mode 3 when all required RCS leakage detection systems are inoperable from 6 hours to 7 hours and the time allowed to reach Mode 5 from 36 hours to 37 hours | 3.1.F.1.c | 3.4.15 RA-F.1 3.0.3 LCO | III |
| L.3 | Relaxes requirements for the number and diversity of RCS leakage detection instruments, the allowable out of service times for these instruments, and the compensatory actions required if one or more RCS leakage detection instruments are not Operable. These changes make IP2 consistent with the recommendations in Reg. Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," as presented in NUREG-1431, Rev. 2. | 3.1.F.1.a 3.1.F.1.b.2 | 3.4.15 LCO 3.4.15 RA-A.1 3.4.15 RA-A.2 | V |
| L.4 | Eliminates the option of using two containment atmosphere radiation monitors (gaseous and particulate) if the containment fan cooler condensate flow monitor is not Operable. | 3.1.F.1.a.(6)(a) 3.1.F.1.a.(6)(b) 3.1.F.1.b.(3) | 3.4.15 LCO 3.4.15 RA-A.1 3.4.15 RA-A.2 | |
| L.5 | Allows the compensatory action for inoperable containment sump monitor (i.e., RCS water inventory balance every 24 hours) until 12 hours after establishment of steady state operations because steady state operation is required to perform a proper inventory balance. | 3.1.F.1.b.(3) | 3.4.15 RA-A.1 | IV |
| L.6 | Allows both containment atmosphere radiation monitors and the containment fan cooler condensate flow monitor to be inoperable for up to 30 days. CTS required at least one containment atmosphere radiation monitor or the containment fan cooler condensate flow monitor to be Operable at all times. | 3.1.F.1.b.(6) | 3.4.15 RA-D.1 3.4.15 RA-D.2 | V |
| L.7 | Allows use of an RCS water inventory balance as the compensatory action for inoperable required containment atmosphere radioactivity monitoring system. | 3.1.F.1.b.(6) | 3.4.15 RA-B.1 3.4.15 RA-B.2 | |

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement

V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|----------------------|-------------------------|----------|
| ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY | | | | |
| L.1 | Excludes I-135 when calculating of E-Bar and when measuring gross specific activity. This change is made in conjunction with a change that adds a new limit for transient and steady state Dose Equivalent I-131 and requirement for periodic verification that Dose Equivalent I-131 is within these limits which ensure that the radiological consequences after an SGTR are within 10 CFR 50.67 limits. | 1.0 T 4.1-1, No.1 | 1.0 3.4.16.1 SR | |
| L.2 | Extends the allowance for the first determination of E-bar from as soon as the "gross activity analysis" exceeds 10 micro curies per cc to 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for at least 48 hours. | T 4.1-2, No.1 | 3.4.16.3 SR | II |
| L.3 | Increases maximum interval between determinations of E Bar from 30 weeks to 32.5 weeks consistent with the allowance provided in ITS SR 3.0.2. | T 4.1-2, No.1 | 3.4.16.3 SR 3.0.2 SR | II |
| L.4 | Eliminates requirement for accelerated re-calculation of E-bar based on the results of the gross specific activity verification. | T 4.1-2, No.1 | 3.4.16.3 SR | II |

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement

V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS
ITS SECTION 3.5 – EMERGENCY CORE COOLING SYSTEMS (ECCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|------------------|-------------------------------------|----------|
| ITS SPECIFICATION 3.5.1 - ACCUMULATORS | | | | |
| L.1 | Eliminates restriction on concurrent inoperability of an Accumulator when any RWST, any HHSI Pump, any RHR Pump, or any Recirculation Pump (even if the minimum complement of ECCS systems assumed available in the safety analysis) remains Operable. | 3.3.A.2 | 3.5.1 LCO 3.5.2 LCO 3.5.4 LCO | V |
| L.2 | CTS require immediate reactor shutdown if one accumulator is inoperable because boron concentration is not within limits. ITS allows 72 hours to restore boron concentration before reactor shutdown must be initiated if only one accumulator has a boron concentration not within required limits. | 3.3.A.2 | 3.5.1 RA-A.1 | III |
| L.3 | CTS requirement to place reactor in cold shutdown (within 48+ hours) if inoperable accumulator not restored to Operable within specified time replaced with ITS requirement to place reactor outside Applicability within 12 hours. Ambiguity between CTS Applicability and CTS Actions is resolved by ensuring that the Actions are consistent with the ITS Applicability. | 3.3.A.2 | 3.5.1 RA-C.2 | I |
| L.4 | Increases Completion Time for restoration of an inoperable ECCS accumulator from immediately to 24 hours based on WCAP-15049, "Risk Informed Evaluation of an Extension to Accumulator Completion Times," and the justification provided in TSTF-370, Rev. 1. | 3.3.A.2 3.0.1 | 3.5.1 RA-B.1 | III |
| L.5 | ITS maintains the requirement that each accumulator isolation valve is fully open with motor operators de-energized; however, the implementing detail that "circuit breakers at the MCC must be locked out" is deleted. ITS SR 3.5.1.1 and ITS SR 3.5.1.5 use administrative controls and new requirements for periodic verification that the valves are open and de-energized to ensure that the valves are open when required. | 3.3.A.1.1 | 3.5.1.1 SR 3.5.1.5 SR | II |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|--|----------------------------------|----------|
| ITS SPECIFICATION 3.5.2 - ECCS - OPERATING | | | | |
| L.1 | Deleted the explicit requirements for a high head safety injection flow test and/or verification of the position of mechanical stops on ECCS injection lines following any maintenance or modifications to those components. ITS SR 3.0.1 addresses these issues generically, eliminating need for the requirement for individual systems or components. | 4.5.A.1.c 4.5.A.1.d | 3.0.1 SR | II |
| L.2 | Decreases the Frequency for verification that the position stop for each ECCS throttle valve is in the correct position from "at a convenient outage, if not verified in the preceding three months" to every 24 months. | 4.5.A.1.d | 3.5.2.6 SR | II |
| L.3 | Added a relaxation that the high head safety injection flow path may be isolated for 2 hours in Mode 3, under controlled conditions, to perform pressure isolation valve testing per SR 3.4.14.1. | 4.5.A.1 3.3.A.2 | 3.5.2 LCO Note 3.4.14.1 SR | V |
| L.4 | Eliminates restriction on concurrent inoperability of an Accumulator, the RWST, any HHSI Pump, any RHR Pump, or any Recirculation Pump even if the minimum complement of ECCS systems assumed available in the safety analysis remains Operable. | 3.3.A.2 | 3.5.2 RA-A.1 3.5.2 RA-C.1 | V |
| L.5 | Extends the Allowable out of service time for ECCS (HHSI, RHR and Recirculation) to 72 hours if equipment supporting flow equivalent to two HHSI pumps, one RHR pump and one recirculation pump remain Operable. | 3.3.A.2.a 3.3.A.2.b 3.3.A.2.c 3.3.A.2.d | 3.5.2 RA-A.1 | III |
| L.6 | Deletes statements that ECCS pump system testing "will be considered satisfactory if control board indication and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing; that is, the appropriate pump breakers shall have opened and closed, and the appropriate valves shall have completed their travel" because requirements for Operability are covered by the ITS definition of Operability and general statements about what constitutes a satisfactory performance of an SR is generally not included in the acceptance criteria for either the CTS or ITS. | 4.5.A.1.b | 3.5.2.4 SR 3.5.2.5 SR | II |
| L.7 | Deleted the phrase "With the Reactor Coolant System pressure less than or equal to 350 psig and temperature less than or equal to 350°F..." in CTS 4.5.A.1.a because, at IP2, testing of the Safety Injection System (i.e., High Head Safety Injection Pumps and the RHR pumps) is performed in Mode 5 consistent with the clarification in the ITS Bases that testing must be performed "under conditions that apply during a plant | 4.5.A.1.a | 3.5.2.4 SR 3.5.2.5 SR | II |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-------------|-------------------------------------|----------|
| ITS SPECIFICATION 3.5.3 - ECCS – SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST) | | | | |
| L.1 | Eliminates restriction on concurrent inoperability of the RWST, Accumulators, HHSI Pumps, RHR Pumps, or Recirculation Pumps if the minimum complement of ECCS systems assumed available in the safety analysis remains Operable. | 3.3.A.2 | 3.5.4 LCO 3.5.1 LCO 3.5.2 LCO | V |
| L.2 | Provides an 8 hour allowance to restore RWST boron concentration to within required limits before plant shutdown and cooldown must be initiated. | 3.3.A.2 | 3.5.4 RA-A.1 | III |
| L.3 | CTS requires immediate reactor shutdown if RWST is inoperable because no allowable out of service time is specified. ITS allows 1 hour to restore inoperable RWST before reactor shutdown must be initiated. | 3.3.A.2 | 3.5.4 RA-C.1 | III |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.6 – CONTAINMENT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|------------------|---|----------|
| ITS SPECIFICATION 3.6.1 - CONTAINMENT | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS | | | | |
| L.1 | Allows ingress or egress through an air lock with an inoperable door whenever necessary to perform repairs on the affected air lock components. Allows ingress or egress through an air lock with an inoperable door for any reason for a period of 7 days beginning when the second air lock (i.e., both) becomes inoperable. | 3.6.A.3 1.7 | 3.6.2 RA-A.1 3.6.2 RA-Note 1 | V |
| L.2 | Allows 24 hours to restore an inoperable airlock provided containment leakage limits are met during that period and at least one air lock door is closed during that period. | 3.6.A.3 | 3.6.2 RA-C.3 | III |
| L.3 | Allows completely separate re-entry into any Condition for each air lock addressed by the Condition including separate tracking of Completion Times based on this re-entry. | 1.7.c 3.6.A.3 | 3.6.2 RA-Note 2 3.6.2 RA-A.1 3.6.2 RA-C.1 | V |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|--------------------------------------|--|----------|
| ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES | | | | |
| L.1 | Allows use of a check valve with flow through the valve secured to isolate a penetration when only one of two (or more) containment isolation valves in a penetration is inoperable. | 1.7.d 3.6.A.1.b 3.6.A.1.c | 3.6.3 RA-A.1 3.6.3 RA-B.1 3.6.3 RA-C.1 | V |
| L.2 | Extends the Completion Time to isolate a penetration with an inoperable automatic containment isolation valve from 4 hours to 72 hours for penetration flow paths with only one containment isolation valve but protecting a closed system. | 3.6.A.3.a.2(b) 3.6.A.3.a.2(c) | 3.6.3 RA-C.1 | III |
| L.3 | Expands allowance in CTS 3.6.A.1.a permitting manual containment isolation valves to be opened to include manual valves used to substitute for inoperable automatic isolation valves and automatic valves that are closed as part of a Required Action (excluding the 36 inch purge valves) and eliminates the limitation that valves may be open only as long as necessary to perform the intended function. | 3.6.A.1.a T 3.6-1 | 3.6.3 RA-Note 1 | V |
| L.4 | Not Used. | NA | NA | |
| L.5 | Expands conditions that allow opening the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves from "containment pressure control, or to facilitate safety-related surveillance or safety-related maintenance" to "pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open." | 3.6.A.2 3.6.A.2 Note 1 | 3.6.3.1 SR 3.6.3.2 SR | V |
| L.6 | Superseded by Amendment 223. | NA | NA | |
| L.7 | Exempts valves that are locked, sealed or otherwise secured in position from the requirement to verify that containment isolation valves actuate to the isolation position on an actual or simulated containment isolation signal. | T 4.1-3, Item 5 | 3.6.3.6 SR | II |
| L.8 | Deletes requirement that isolation devices used to isolate containment penetrations must "meet the same design criteria as the isolation valve" to a licensee document controlled by 10 CFR 50.59 (i.e., ITS Bases for LCO 3.6.3). | 1.7.d 3.6.A.1.b 3.6.A.3.a.2(c) | 3.6.3 LCO | IV |
| L.9 | Extends the Completion Time for restoration of leakage limits for the leakage rate into containment from the isolation valves sealed with the service water system from 4 hours to 72 hours because of the availability of alternate methods for performing the containment recirculation function and the low probability of an event occurring during the 72 hour period when leakage limits are not met. | 3.6.A.1.f 3.6.A.3 4.4.D.2.b | 3.6.3 RA-A.1 | III |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|--------------------|--|----------|
| ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE | | | | |
| L.1 | Allows one hour for restoration of containment pressure to within required limits before a reactor shutdown must be initiated. | 3.0 3.6.B | 3.6.4 RA-A.1 | III |
| ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE | | | | |
| L.1 | Allows 8 hours for restoration of containment average air temperature to within required limits before a reactor shutdown must be initiated. | 3.6.C | 3.6.5 RA-A.1 3.6.5 RA-B.1 3.6.5 RA-B.2 | III |
| ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER UNIT (FCU) SYSTEM | | | | |
| L.1 | Allows the containment spray system or the fan cooler units to be inoperable regardless of the Operability status of the recirculation pH control system. | 3.3.B.2 | 3.6.6 LCO 3.6.6 RA-A.1 | V |
| L.2 | Not Used | NA | NA | |
| L.3 | Allows any one FCU train (i.e., up to 2 FCUs) to be inoperable for 7 days and any two FCU trains (i.e., up to 4 FCUs) to be inoperable for 72 hours if the combination of Operable FCUs and containment spray pumps provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value. | 3.3.B.2 | 3.6.6 RA-C.1 3.6.6 RA-D.1 3.6.6 RA-F.1 | IV |
| L.4 | Decreases the Frequency for verification that containment spray nozzles are not obstructed from once every 5 years to once every 10 years. | 4.5.B.2 | 3.6.6.8 SR | II |
| L.5 | Eliminates statement that containment spray system "tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily" because ITS requires demonstrating Operability and this type of generic statement is not used in either the CTS or ITS. | 4.5.B.1 4.5.B.3 | 3.6.6.5 SR 3.6.6.6 SR | II |
| L.6 | Clarifies that functional tests of the containment spray system and fan cooler units may be initiated by either an actual or simulated signal. | 4.5.B.1 | 3.6.6.5 SR 3.6.6.6 SR | II |
| L.7 | Allows one of the two containment spray pumps to be inoperable for up to 72 hours even when 1 train of fan cooler units (i.e., up to two FCUs powered from the same safeguards power train) is also inoperable if the combination of Operable FCUs and containment spray pumps provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value. | 3.3.B.2.b | 3.6.6 RA-A.1 3.6.6 RA-F.1 | IV |
| ITS SPECIFICATION 3.6.7 - RECIRCULATION pH CONTROL SYSTEM | | | | |
| L.1 | Allows the recirculation pH control system to be inoperable regardless of the Operability status of either the containment spray system or the fan cooler units. | 3.3.B.2 | 3.6.7 RA-A.1 | V |
| L.2 | Not Used. | NA | NA | |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|----------------------|--|----------|
| ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS | | | | |
| L.1 | Allows a hydrogen recombiner to be inoperable (for up to 30 days) if the redundant hydrogen recombiner is Operable but eliminates the requirement that the post accident containment venting system is Operable. | 3.3.G.2 3.3.G.2.a | 3.6.8 RA-A.1 | V |
| L.2 | Allows both hydrogen recombiners to be inoperable for up to 7 days if the post accident containment venting system is functional (i.e., capable of limiting the peak post accident hydrogen concentration in containment to less than 4.0 volume percent). | 3.3.G.2 3.3.G.2.a | 3.6.8 RA-B.1 3.6.8 RA-B.2 | III |
| L.3 | Superceded by TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints." | NA | NA | |
| ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM | | | | |
| L.1 | Establishes a 24 hour allowable out of service time for IVSW inoperability for reasons other than inoperable header or inoperable automatic actuation valve (e.g., water level low, nitrogen pressure low, etc). | 3.3.C.2 3.0 | 3.6.9 RA-B.1 | III |
| ITS SPECIFICATION 3.6.10 - WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WCPPS) | | | | |
| L.1 | Allows components supported by WC&PPS on more than one header to be inoperable at the same time and allows separate condition entry for each component supported by WC&PPS. | 3.3.D.2.a 3.3.D.3 | 3.6.10 RA- Note 1 3.6.10 RA-A.1 3.6.10 RA-A.2 | V |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.7 – PLANT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|---------------|---|----------|
| ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs) | | | | |
| L.1 | Eliminates requirement for a reduction of the Power Range Neutron Flux Trip Setpoint if only one MSSV in one or more SGs is inoperable. | 3.4.A.1 | 3.7.1 RA-A.1 | IV |
| L.2 | Decreases frequency for testing MSSVs from every 24 months to in accordance with the ASME Code, Section XI, as stipulated in ANSI/ASME OM-1-1987. Adopting these standards will relax the CTS 24 month Frequency because the ANSI/ASME Standard requires that all valves be tested every 5 years, and a minimum of 20% of the valves be tested every 24 months. | T 4.1-3, No.4 | 3.7.1.1 SR | II |
| ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs) | | | | |
| L.1 | Establishes an allowable out of service time for one or more inoperable MSCV which eliminates the current requirement for an immediate shutdown if an MSCV is inoperable. | 3.4.A.5 | 3.7.2 LCO 3.7.2 RA-A.1 3.7.2 RA-B.1 3.7.2 RA-B.2 3.7.2 RA-F.1 3.7.2 RA-F.2 | III |
| L.2 | Relaxes Applicability to require MSIVs to be Operable only if [MSIVs are] is open. | 3.4.A | 3.7.2 APP 3.7.2 RA-D.1 3.7.2 RA-E.1 3.0.4 LCO | I |
| ITS SPECIFICATION 3.7.3 - MAIN FEEDWATER ISOLATION | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV's) | | | | |
| | NONE | | | |

Categories for L-Table

| | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-----------------------------------|---------------------------|----------|
| ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM | | | | |
| L.1 | Allows 7 days to restore the redundant steam supply to steam driven AFW pump before initiation of plant shutdown is required (versus 72 hours if the AFW pump is considered inoperable). | 3.4.B | 3.7.5 RA-A.1 | III |
| L.2 | Adds an allowance that the SRs are not required to be performed for the turbine driven AFW pump until 24 hours after pressure in the steam generators is greater than or equal to 600 psig. | 4.8.A.1 4.8.A.2 | 3.7.5.4 SR 3.7.5.2 SR | II |
| L.3 | Deletes requirement for periodic verification of AFW flow to each SG because IP2 uses AFW during normal startup and shutdown which independently verifies the adequacy of the flow path to each SG which is common for each of the AFW pumps. | 4.8.A.2 | 3.7.5.2 SR | II |
| L.4 | Allows 7 days to restore the steam driven AFW pump to Operable if the inoperability is discovered before the plant has entered Mode 2 following a refueling outage and the plant does not enter Mode 2 until the pump is Operable. | 3.4.B.1.a | 3.7.5 RA-A.1 | III |
| L.5 | Deletes requirement to immediately place auxiliary feedwater start in the manual mode when one or both of the valves on the common AFW suction are closed (i.e., ITS LCO 3.7.5, Condition D, loss of 3 AFW pumps). Requirement is for equipment protection and is maintained in IP2 UFSAR 10.2.6.3. | 3.4.C.1 3.4.C.2 | 3.7.5 | IV |
| ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK | | | | |
| L.1 | Increases the allowable out of service time for an inoperable CST from 72 hours to 7 days. | 3.4.A.3 3.4.B | 3.7.6 RA-A.2 | III |
| ITS SPECIFICATION 3.7.7 - COMPONENT COOLING WATER (CCW) SYSTEM | | | | |
| L.1 | Reduces the required number of Operable CCW pumps from three to two because both CCW trains use common piping on the suction and discharge of the pumps and any one of the three CCW pumps in conjunction with any one of the two CCW heat exchangers is sufficient to accommodate the normal and post accident heat load. | 3.3.E.1.a 3.3.E.1.c 3.3.E.2 | 3.7.7 LCO 3.7.7 RA-A.1 | V |
| L.2 | Extends the allowable out of service time to restore 100% redundancy to the CCW function from 24 hours to 72 hours. | 3.3.E.1.a | 3.7.7 RA-A.1 | III |
| L.3 | Deletes requirements for the auxiliary component cooling pumps because UFSAR 6.2.3.3.2.4 states that these pumps are not necessary to protect the recirculation pump motors from the containment atmosphere during the injection phase. | 3.3.E.1.b 3.3.E.2.c | 3.7.7 | V |
| L.4 | Deletes restriction that "Component Cooling Pump 22 may be out of service if Emergency Diesel Generator 22 is out of service or if no emergency diesel generator | 3.3.E.2.a | 3.7.7 3.8.1 | V |

Categories for L-Table

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|--|--|
| I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions | V - Relaxation of LCO |
| II - Relaxation of Surveillance Requirement | VI - Relaxation of Reporting Requirement |
| III - Relaxation of Completion Time | |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|------------------------|------------------------------|----------|
| ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM | | | | |
| L.1 | Extends the Allowable Out of Service Time when one of three required essential SW pumps is inoperable and/or one of two required non-essential SW pumps is inoperable from 12 and 24 hours, respectively, to 72 hours. | 3.3.F.1.a 3.3.F.2.a | 3.7.8 RA-A.1 3.7.8 RA-B.1 | III |
| ITS SPECIFICATION 3.7.9 - ULTIMATE HEAT SINK (UHS) | | | | |
| L.1 | Not Used. | NA | NA | |
| ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS) | | | | |
| L.1 | Not Used. | NA | NA | |
| L.2 | Allows alternating between Control Room Ventilation System fans for each test performance of the test that verifies that the system maintains the control room at positive pressure relative to the adjacent areas during the pressurization mode of operation. CTS did not establish any requirements for redundancy for the CRVS; therefore, a satisfactory performance of the test by either fan would have established Operability of the CRVS. | 3.5.E.4 | 3.7.10.4 SR | II |
| ITS SPECIFICATION 3.7.11 - SPENT FUEL PIT WATER LEVEL | | | | |
| L.1 | Relaxes Applicability for when a specified minimum level is required in the spent fuel pit from "any time it contains irradiated fuel" to "during movement of irradiated fuel assemblies in the spent fuel pit." | 3.8.C 3.8.C.2 | 3.7.11 LCO | V |
| L.2 | Reduces the minimum required water level in the spent fuel pit from approximately 24 feet to greater than or equal to 23 feet above the top of irradiated fuel assemblies seated in the storage racks which is consistent with the assumptions used in the design basis analysis of a fuel handling accidents in the Fuel-Handling Building. | 3.8.C.2 | 3.7.11 LCO | V |
| ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION | | | | |
| L.1 | Superseded by Amendment 227 dated May 29, 2002. | NA | NA | |
| L.2 | Eliminates the requirement that spent fuel pit boron concentration meets the higher minimum level required in the refueling cavity whenever fuel is being loaded or unloaded from the reactor. | 3.8.D.3 3.8.D.4 | 3.7.12 LCO | V |
| ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE | | | | |
| L.1 | Corrects typographical error in CTS 3.8.D.1.d introduced in Amendment 227 that prevents use of the six designated "peripheral" cells for their intended purpose of storing fuel assemblies that are permanently discharged after only one cycle (i.e., low burnup fuel assemblies). | 3.8.D.1.d | 3.7.13 LCO F 3.7.13-4 | V |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|-----------------------------------|-------------------------|----------|
| L.2 | Eliminates requirement for immediate verification that spent fuel pit boron concentration is within required limits if a fuel assembly is determined to be stored in a location not permitted by the LCO because this requirement is redundant to requirements in ITS LCO 3.7.14, Spent Fuel Pit Boron Concentration. | 3.8.D.2.a | 3.7.13 LCO | IV |
| ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY | | | | |
| L.1 | Decreases the Frequency for verification that secondary coolant Iodine-131 concentration is within limits assumed in the offsite dose calculations from weekly with a maximum time between tests of 10 days to once per 31 days with a maximum time between tests governed by ITS SR 3.0.2. | T 4.1-2, No.9 | 3.7.14.1 SR 3.0.2 SR | II |
| L.2 | Eliminates requirement for more frequent (i.e., daily) verification when secondary coolant iodine-131 activity exceeds 10% of the limit. | T 4.1-2, No. 9 T 4.1-2, Note 4 | 3.7.14 | II |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.8 – ELECTRICAL POWER SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|--------------------|--|----------|
| ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING | | | | |
| L.1 | Limits the requirement to disable automatic transfer of 6.9 kV buses 1, 2, 3, and 4 to the offsite source if the 13.8 kV offsite source is supplying 6.9 kV bus 5 or 6 to those times that the Unit Auxiliary Transformer is supplying 6.9 kV bus 1, 2, 3 or 4. | 3.7.B.4 | 3.8.1 RA-A.2 | |
| L.2 | Extends the allowable out of service time (AOT) for an inoperable offsite source from 24 hours to 72 hours consistent with the recommendations of Regulatory Guide 1.93, Availability of Electric Power Sources, Revision 0. | 3.7.B.3 | 3.8.1 RA-A.4 | III |
| L.3 | Allows 4 hours to declare inoperable any required feature supported by an inoperable diesel generator if the required redundant feature is inoperable. | 3.7.B.1.a | 3.8.1 RA-B.2 | III |
| L.4 | Eliminates the requirement that the Operable DGs must be tested within 24 hours whenever a DG is declared inoperable if it can be determined that the cause of the DG's inoperability does not exist on the Operable DGs. | 3.7.B.1 | 3.8.1 RA-B.3.1 3.8.1 RA-B.3.2 | IV |
| L.5 | Eliminates requirement for immediate shutdown if more than one DG or more than one offsite source is inoperable or if a DG and offsite source are inoperable concurrently. Allows 24 hours to restore at least one offsite source if both are inoperable; allows 12 hours to restore an offsite source or a DG if one offsite source and one DG are inoperable; and, allows 2 hours to restore at least 2 DGs to Operable if 2 or more DGs are inoperable. | 3.7.B | 3.8.1 RA-C.2 3.8.1 RA-D.1 3.8.1 RA-D.2 3.8.1 RA-E.1 | III |
| L.6 | Relaxes CTS 4.6.A.3 requirement that the DG loss of offsite power in conjunction with loss of coolant accident test be conducted on all three DGs at the same time. | 4.6.A.3 | 3.8.1.12 SR 3.8.1.13 SR | II |
| L.7 | Replaces requirement that control switches are 'in the "pull-out" position and tagged to prevent an automatic transfer' with a requirement to verify automatic transfer is disabled within 1 hour and every 8 hours thereafter. | 3.7.B.3 3.7.B.4 | 3.8.1 RA-A.2 | IV |
| ITS SPECIFICATION 3.8.2 - AC SOURCES - SHUTDOWN | | | | |
| | NONE | | | |

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement

V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|--------------------|--|----------|
| ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR | | | | |
| L.1 | Eliminates requirements for maintaining an offsite DG fuel oil reserve except when in Modes 1, 2, 3 and 4. | 3.7.A.5 4.6.B | 3.8.3 RA-B.1 3.8.3.1 SR | I |
| L.2 | Decreases the Frequency for verification of the DG fuel oil inventory in the DG fuel oil storage tanks from weekly to every 31 days. | T 4.1-3, No.7 | 3.8.3.1 SR | II |
| L.3 | Provides time to attempt restoration if properties of diesel fuel oil in the DG storage tanks or DG fuel oil reserve do not meet acceptance criteria specified in Specification 5.5.11, "Diesel Fuel Oil Testing Program." | 3.7 4.6 | 3.8.3 RA-D.1 3.8.3 RA-E.1 3.8.3.3 SR 3.8.3.4 SR | III |
| L.4 | Allows 48 hours to restore starting air receiver pressure if the pressure is not sufficient for four successive DG start attempts but sufficient for at least one start attempt. | 3.7 4.6 | 3.8.3 RA-F.1 | IV |
| L.5 | Allows 2 hours to attempt restoration before a DG is declared inoperable if the volume in the associated DG fuel oil storage tank or the offsite reserve falls below the specified minimum volume. | 3.7.B.1.b | 3.8.3 RA-A.1 3.8.3 RA-C.1 | III |
| ITS SPECIFICATION 3.8.4 - DC SOURCES – OPERATING | | | | |
| L.1 | Allows a battery or a battery and its associated charger to be inoperable at the same time for up to 24 hours if both the DC control power and the inverter supporting the vital instrument bus are already supplied by or will automatically transfer to an alternate source. | 3.7.B.5 3.7.B.6 | 3.8.4 RA-B.3 | V |
| L.2 | Allows one battery charger to be inoperable for up to 7 days if battery terminal voltage is restored to greater than or equal to the minimum established float voltage within 2 hours and battery float current is verified to be within the limits of for a fully charged battery once per 12 hours. Alternately, allows the Actions for an inoperable battery and charger to be taken if battery terminal voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours or battery float current cannot be restored to within the limits of for a fully charged battery within 12 hours. | 3.7.B.5 3.7.B.6 | 3.8.4 RA-A.2 3.8.4 RA-A.3 | IV |
| ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS | | | | |
| L.1 | Relaxes a requirements to measure voltage of each battery cell every month to a requirement for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell consistent with IEEE-450-1995. | 4.6.C.1 | 3.8.6.2 SR 3.8.6.5 SR | II |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|-------------|--|----------|
| L.2 | Adds Actions and Completion Times which allow a short period of time to restore battery parameters (i.e., cell voltage, battery charge state, battery level, battery temperature) to within surveillance limits before the battery must be declared inoperable. | 3.7.A.6 | 3.8.6 | III |
| ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.8 - INVERTERS - SHUTDOWN | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING | | | | |
| L.1 | Establishes an allowable out of service time of 8 hours for one AC electrical power distribution subsystem, 2 hours for one AC vital instrument bus, and 2 hours for one DC electrical power distribution subsystem. | 3.7 | 3.8.9 RA-A.1 3.8.9 RA-B.1 3.8.9 RA-C.1 | III |
| ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS - SHUTDOWN | | | | |
| | NONE | | | |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|---------------------------|--|----------|
| ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION | | | | |
| L.1 | Eliminates requirements for containment integrity that apply during power operation be established if requirements for boron concentration in the RCS are not met when the reactor vessel head is less than fully tensioned (i.e., Mode 6). | 3.6.A.1 3.8.A.8 | 3.9.1 RA-A.1 3.9.1 RA-A.2 3.9.1 RA-A.3 | V |
| L.2 | Decreases Surveillance Frequency for the verification that boron concentration of all filled portions of the RCS and the refueling cavity are within specified limits while in Mode 6 from daily to every 72 hours. | 3.8.B.2 | 3.9.1.1 SR | II |
| ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION | | | | |
| | NONE | | | |
| ITS SPECIFICATION 3.9.3 - CONTAINMENT PENETRATIONS | | | | |
| L.1 | <p>Eliminates Technical Specification requirements for containment closure during refueling operations except during movement of recently irradiated fuel within the containment" with the term "recently" defined in the ITS Bases as fuel assemblies that has been part of a critical reactor in the previous 100 hours. These relaxations were evaluated and accepted by the NRC based on an evaluation documented in the Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000.</p> <p>Note: Currently, CTS 3.8.B.4 specifies that "No movement of fuel in the reactor shall be made until the reactor has been subcritical for at least 100 hours." This requirement will be maintained in Technical Requirements Manual (TRM) 3.9.A. Therefore, TRM 3.9.a will prohibit movement of any fuel that can be classified as "recently irradiated" even though LCO 3.9.3 establishes requirements that are applicable only during the movement of recently irradiated fuel.</p> | 3.8.A 3.8.B 3.8.B.4 | 3.9.3 | I |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|--|-------------------------------|--------------|----------|
| L.2 | <p>Allow the personnel access door in the containment closure plate to be open during movement of recently irradiated fuel as long as it was "capable of being closed" in the event of a refueling accident.</p> <p>Note: Currently, CTS 3.8.B.4 specifies that "No movement of fuel in the reactor shall be made until the reactor has been subcritical for at least 100 hours." This requirement will be maintained in Technical Requirements Manual (TRM) 3.9.A. Therefore, TRM 3.9.a will prohibit movement of any fuel that can be classified as "recently irradiated" even though LCO 3.9.3 establishes requirements that are applicable only during the movement of recently irradiated fuel.</p> | 3.8.B.4 3.8.B.8 | 3.9.3.a | I |
| L.3 | Eliminates requirement that containment closure is maintained by a valve that is "locked closed" and allows requirements for containment closure to be satisfied by "Closed by a manual or automatic isolation valve, blind flange, or equivalent" where equivalent is satisfied by any material that can provide a temporary, atmospheric pressure, ventilation barrier. | 3.8.A.1 3.8.B.4 3.8.B.8 | 3.9.3.c | V |
| L.4 | Allows penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls during movement of recently irradiated fuel. | 3.8.B.4 | 3.9.3 | V |
| L.5 | Eliminates requirements that Surveillance Tests for the containment purge supply, exhaust and pressure relief isolation valves be performed prior to a specific event (i.e., Prior to initial movement of the reactor vessel head) and requires that Surveillance Tests be performed only at a periodic Frequency of 24 months. | 3.8.A.1 | 3.9.3.2 SR | II |
| ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL | | | | |
| L.1 | Deletes requirement to suspend the unloading of fuel from the reactor or the loading of unirradiated fuel when requirements for redundant decay heat removal capability and forced flow in the reactor coolant system are not met. ITS LCO 3.9.4 will maintain the restriction on loading of irradiated fuel. | 3.8.A.3 3.8.B.12 | 3.9.4 RA-A.2 | V |
| ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL | | | | |
| L.1 | Eliminates the requirement to suspend all operations involving a reduction in boron concentration of the RCS when in Mode 6 when water level is less than 23 feet above the RPV flange and one RHR loop is in operation but no backup RHR loop is Operable. | 3.8.A.3 3.8.A.5 | 3.9.5 RA-A.1 | IV |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|-------------|-------------|----------|
| L.2 | Adds Note that that allows one RHR loop to be inoperable for a period of 2 hours provided the other loop is OPERABLE and in operation when in Mode 6 with water level less than 23 feet above the reactor vessel flange. | 3.8 | 3.9.5 | V |
| ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL | | | | |
| | NONE | | | |

Categories for L-Table

I - Relaxation of Modes of Applicability IV - Relaxation of Required Actions

II - Relaxation of Surveillance Requirement

V - Relaxation of LCO

III - Relaxation of Completion Time

VI - Relaxation of Reporting Requirement

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|----------------------|-------------------|-------------|-------------|----------|
| | NONE | | | |

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE L - LESS RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|---|------------------|-------------|----------|
| ITS SPECIFICATION 5.1 - RESPONSIBILITY | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.2 – ORGANIZATION | | | | |
| L.1 | Provides an allowance for the unexpected absence of the required radiation protection technician that is similar to the allowance for unexpected absence of licensed operators provided in 10 CFR 50.54 (m)(2)(i), Note 1. | 6.2.2.d | 5.2.2.c | III |
| L.2 | Replaces proscriptive requirements for staff working hours in Generic Letter 82-12 with requirement that "Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions" and that "The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime." | 6.2.2.g | 5.2.2.d | V |
| ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.4 – PROCEDURES | | | | |
| L.1 | Deletes requirements for Post Accident Sampling capability in CTS 6.8.4 and License Condition 2.M based on the analysis in WCAP-14986, Rev. 1, "Post Accident Sampling System Requirements: A Technical Basis," and the associated NRC Safety Evaluation dated June 14, 2000. | 6.8.4 Lic 2.M | 5.4 | V |
| ITS SPECIFICATION 5.5 – PROGRAMS AND MANUALS | | | | |
| ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM) | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM | | | | |
| | NONE | | | |

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Section 5.0

Categories for L-Table

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|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|---|---|------------------|------------------|----------|
| ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.5 - REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM | | | | |
| L.1 | Deleted requirement in CTS 4.2.4 and CTS Table 4.2-1 for special reactor vessel inspections of "indications" 236 inches below the RV flange at azimuth 345" based on NRC agreement that inspections are not required as documented in a letter from Donald S. Brinkman (NRC) to Stephen B. Bram (Consolidated Edison), "Reactor Vessel Fracture Mechanics Analysis (TAC No. 73794). | 4.2.4 T 4.2-1 | 5.5.6 | V |
| ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP) | | | | |
| L.1 | Deletes the explicit requirement that testing of the sample of the charcoal adsorber be completed "within 31 days after removal" because ITS 5.5.9.c maintains the existing requirement that a sample of the charcoal adsorber is tested in accordance with ASTM D3803-1989 and Regulatory Position 6.a of Regulatory Guide 1.52, Revision 2, March 1978, does not identify any deviations from ASTM D3803-1989 about the time that may elapse between removal of the sample and testing. | 4.5.E.2.d | 5.5.9 5.5.9.c | III |
| ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.12 - TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP) | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM | | | | |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

| Discussion of Change | Summary of Change | CTS Section | ITS Section | Category |
|--|--|----------------------------------|----------------------|----------|
| L.1 | Adopts the allowance in ITS SR 3.0.3 that provides up to 24 hours to complete a missed surveillance requirement before a system or component is declared inoperable (i.e., LCO not met). | 4.0.1 4.4.A 4.4.C 4.4.D | 5.5.14.e 3.0.3 SR | III |
| ITS SPECIFICATION 5.5.15 – BATTERY MONITORING AND MAINTENANCE PROGRAM | | | | |
| | NONE | | | |
| ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS | | | | |
| | NONE | | | |

Categories for L-Table

- | | |
|---|--|
| I - Relaxation of Modes of Applicability | IV - Relaxation of Required Actions |
| II - Relaxation of Surveillance Requirement | V - Relaxation of LCO |
| III - Relaxation of Completion Time | VI - Relaxation of Reporting Requirement |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 1.0 - USE AND APPLICATION

| Discussion of Change | Summary of Change | ITS Section | CTS Section |
|----------------------|---|-------------|----------------|
| M.1 | Adds New Technical Specification Definitions. Any technical changes that result from the adoption of these definitions are identified and justified in the DOCs associated with the applicable LCOs. | 1.0 | 1.1 |
| M.2 | Creates a distinction between a refueling condition and core alterations so that LCO requirements and required actions can be established that differentiate between refueling conditions (i.e., one or more reactor vessel head closure bolts is less than fully tensioned) with and without core alterations in progress. | 1.2.5 | 1.1 T 1.1-1 |
| M.3 | Establishes the Refueling Operation Condition (i.e., Mode 6) when one or more reactor vessel head closure bolts less than fully tensioned (versus when the vessel head is completely unbolted). | 1.2.5 | 1.1 T 1.1-1 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 2.0 - SAFETY LIMITS (SLs)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|----------------|----------------|
| M.1 | Adds explicit safety limit for departure from nucleate boiling (DNB) that is implicitly required by existing limits on combinations of reactor power, reactor pressure and reactor temperature. | 2.2 F 2.1-1 | 2.1.1 |
| M.2 | Establishes more explicit requirements for prompt restoration of compliance with SLs and more explicit requirements for a prompt reactor shutdown if SLs are violated. | 6.7.1.a | 2.2.1 2.2.2 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.0 - LCO APPLICABILITY AND SR APPLICABILITY

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------|-----------------------|
| M.1 | Adopts ITS LCO 3.0.4 and SR 3.0.4, including TSFT-359, Revision 9, "Increased Flexibility in MODE Restraints," which establishes restrictions on placing the unit in a mode or other specified condition stated in the applicability when conditions are such that the requirements of the LCO would not be met if the LCO were entered. IP2 CTS currently has no restrictions on changing Modes when an LCO is not met. | 3.0 4.0 | 3.0.4 LCO 3.0.4 SR |
| M.2 | Clarifies that the 25% extension to the SR Frequency applies only to each performance after the initial performance of an SR or Action and prohibits using this allowance for SRs or Actions that are performed only once. | 4.0.1 | 3.0.2 SR |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.1 – REACTIVITY CONTROL SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|-------------------------|--|
| ITS SPECIFICATION 3.1.1- SHUTDOWN MARGIN (SDM) | | | |
| M.1 | Establishes the Applicability for Shutdown Margin (SDM) as Mode 2 with keff less than 1.0 and in Modes 3, 4 and 5. Requirements for SDM are controlled by LCO 3.9.1 when in Mode 6 and by LCO 3.1.5 and LCO 3.1.6 when in Modes 1 and Mode 2 with Keff greater than or equal to 1.0. | 3.10.1 | 3.1.1 APP |
| M.2 | Adds requirement to initiate boration of the RCS within 15 minutes of the determination that shutdown margin (SDM) requirement is not met. | 3.10.1 | 3.1.1 RA-A.1 3.0.1 |
| M.3 | Adds requirement to verify that SDM is within the limits specified in the COLR every 24 hours. | 3.10.1 T 4.1-1, No.2 | 3.1.1.1 SR |
| ITS SPECIFICATION 3.1.2 - CORE REACTIVITY | | | |
| M.1 | Adds an LCO limit for the maximum difference between predicted versus measured core reactivity during power operation and requirements for a evaluation of the core design and safety analysis and the establishment of appropriate operating restrictions if this limit is exceeded. | 4.9 | 3.1.2 LCO 3.1.2 APP 3.1.2 RA-A.1 3.1.2 RA-A.2 3.1.2 RA-B.1 |
| M.2 | Adds a specific Frequency for verification that the difference between predicted versus measured core reactivity during power operation must be performed prior to entering MODE 1 following each refueling as an initial check on core conditions and design calculations at BOC. This Surveillance must be performed again within the initial 60 EFPD after entering MODE 1 following each refueling and every 31 EFPD thereafter. | 4.9 | 3.1.2.1 SR |
| ITS SPECIFICATION 3.1.3 - MODERATOR TEMPERATURE COEFFICIENT (MTC) | | | |
| M.1 | Adds a new requirement for a lower limit for MTC with the limit specified in the Core Operating Limits Report (COLR) because a lower limit for MTC is an assumption in the accident analysis. | 3.1.C.1 | 3.1.3 APP 3.1.3 LCO 3.1.3 RA-C.1 |
| M.2 | Adds an explicit requirement for verification of the MTC maximum upper limit following refueling. | 3.1.C.1 | 3.1.3.1 SR |
| M.3 | Adds new requirement to verify MTC is within the lower limit once each cycle after exceeding the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm. | 3.1.C.1 | 3.1.3.2 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--|--|
| ITS SPECIFICATION 3.1.4 - ROD GROUP ALIGNMENT LIMITS | | | |
| M.1 | Superseded by CTS Amendment 234. | NA | NA |
| M.2 | Adds explicit requirement to verify within one hour of determination any rod not within alignment limits that SDM remains within required limits or to initiate action to restore SDM. Requires completion of an analysis supporting continued operation within 5 days (versus 30 days) when one rod not within alignment limits. Requires completion of a reactor shutdown within 6 hours of determination that a second rod is not within alignment limits (versus CTS requirement for initiation of reactor shutdown within 8 hours). | 3.10.1 3.10.5.3 3.10.7.2 3.10.7.3 | 3.1.4 RA-B.2.1.1 3.1.4 RA-B.2.1.2 3.1.4 RA-B.2.3 3.1.4 RA-B.2.6 3.1.4 RA-D.1.1 3.1.4 RA-D.1.2 3.1.4 RA-D.2 |
| M.3 | Adds explicit requirement to verify within one hour of determination one or more control rods are inoperable that SDM remains within required limits or to initiate action to restore SDM. ITS requires reactor shutdown whenever one or more control rods inoperable (i.e., eliminates the allowance in CTS 3.10.7.3 for continued operation with one inoperable control rod if analysis performed within 30 days). | 3.10.1 3.10.7.2 3.10.7.3 | 3.1.4 RA-A.1.1 3.1.4 RA-A.1.2 3.1.4 RA-A.2 |
| M.4 | Requires a reduction in reactor power within 2 hours of the determination that a control rod is not within alignment limits regardless of the status of power distribution limits and/or status of the verification of core peaking factors. | 3.10.3 3.10.5.2 | 3.1.4 RA-B.2.2 |
| M.5 | Increases Frequency for verification that rod drop times are within specified limits from the refueling interval (i.e., every 24 months) to "prior to reactor criticality after each removal of the reactor head." | 3.10.8 T 4.1-3, No.1 | 3.1.4.3 SR |
| M.6 | Adds an explicit requirement that the plant be placed in a condition in which the LCO requirements are not applicable if the requirements and the specified compensatory actions are not met. | 3.10.5 3.10.7 | 3.1.4 RA-C.1 |
| M.7 | Requires a reduction in reactor power to less than or equal to 75% RTP within 2 hours when a rod is not within required alignment limits. | 3.10.5.2 | 3.1.4 RA-B.2.2 |
| M.8 | Superseded by CTS Amendment 234. | NA | NA |
| ITS SPECIFICATION 3.1.5 - SHUTDOWN BANK INSERTION LIMITS | | | |
| M.1 | Adds explicit Required Actions for the Conditions when available SDM may be significantly reduced if any shutdown bank is not within the insertion limit and sufficient SDM is not otherwise met. | 3.10.4.1 | 3.1.5 RA-A.1.1 3.1.5 RA-A.1.2 3.1.5 RA-A.2 3.1.5 RA-B.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|--------------------------|--|
| ITS SPECIFICATION 3.1.6 - CONTROL BANK INSERTION LIMITS | | | |
| M.1 | Adds explicit Required Actions for the Conditions when available SDM may be significantly reduced if any control bank is not within the insertion limit and sufficient SDM is not otherwise met. | 3.10.4.2 | 3.1.6 RA-A.1.1 3.1.6 RA-A.1.2 3.1.6 RA-A.2 3.1.6 RA-B.1.1 3.1.6 RA-B.1.2 3.1.6 RA-B.2 3.1.6 RA-C.1 |
| M.2 | Adds explicit requirements for periodic verification that analysis assumptions for control rod position supporting shutdown margin requirements are being met. | 3.10.4.2 T4.1-1, No10 | 3.1.6.1 SR 3.1.6.2 SR 3.1.6.3 SR |
| ITS SPECIFICATION 3.1.7 - ROD POSITION INDICATION | | | |
| M.1 | Increases Frequency for calibration of analog rod position indication channels from the refueling interval (i.e., every 24 months) to "prior to reactor criticality after each removal of the reactor head." | T 4.1-1, No.9 | 3.1.7.1 SR |
| M.2 | Eliminates an allowance that a rod position indication channel is not considered to be inoperable during calibration. | 3.10.6.2 | 3.1.7 |
| M.3 | Eliminates the option of using the excore detectors to verify the position of a control rod with an inoperable position indication channel. | 3.10.6.1 | 3.1.7 RA-A.1 3.1.7 RA-C.1 |
| M.4 | Not Used | NA | NA |
| M.5 | Establishes a completion time of 4 hours to verify rod position for rods with inoperable position indicators subsequent to rod motion exceeding 24 steps. | 3.10.6.1.a | 3.1.7 RA-C.1 |
| M.6 | Adds an explicit statement that the plant be in Mode 3 in 6 hours if requirements for inoperable individual rod position indication channels or demand position indication channels are not met. This reduces the amount of time allowed to reach Mode 3 from 7 hours to 6 hours. | 3.0.1 3.10.6 | 3.1.7 RA-E.1 |
| M.7 | Superceded by CTS Amendment 234. | NA | NA |
| M.8 | Establishes acceptance criteria for IRPI calibration accuracy of plus or minus 12 steps consistent with IRPI accuracy assumptions used in WCAP-15902, "Conditional Extension of the Rod Misalignment Technical Specification for Indian Point Unit 2," and Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 234 to Facility Operating License No. DPR-26, October 12, 2002. | T 4.1-1, No.9 | 3.1.7.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|------------------------------|--|
| ITS SPECIFICATION 3.1.8 - PHYSICS TEST EXCEPTIONS - MODE 2 | | | |
| M.1 | Restricts use of exemptions for physics testing from the requirements for moderator temperature coefficient, minimum temperature for criticality, and rod misalignment limits, unless RCS lowest loop average temperature is maintained greater than 541 °F, shutdown margin (SDM) is maintained greater than limits specified in the COLR, and power is maintained less than 5% RTP. Adds requirements for periodic verification that these requirements are being met during physics testing and requirements for prompt restoration or termination of physics tests and proceeding to Mode 3 if these requirements are not being met. | 3.1.C.1 3.1.C.2 3.10.5 | 3.1.8 RA-A.1 3.1.8 RA-A.2 3.1.8 RA-B.1 3.1.8 RA-C.1 3.1.8 RA-D.1 3.1.8.2 SR 3.1.8.3 SR 3.1.8.4 SR |
| M.2 | Adds new requirements that RCS lowest loop average temperature must be maintained greater than or equal to 541 °F, shutdown margin (SDM) must be maintained greater than limits specified in the COLR, and power must be maintained less than 5% RTP if rod alignment limits will not be met during physics testing. | 3.10.5 3.10.7.2 | 3.1.8.a LCO 3.1.8.b LCO 3.1.8.c LCO 3.1.4 |
| M.3 | Adds requirement to perform a channel operational test (COT) of Reactor Protection System functions that use power range after any changes made to support physics testing and prior to start of the physics testing. | T 3.5-2, No.2a | 3.1.8.1 SR |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.2 - POWER DISTRIBUTION LIMITS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------|--|
| ITS SECTION 3.2.1 - HEAT FLUX HOT CHANNEL FACTOR ($F_Q(Z)$) | | | |
| M.1 | Requires that the post refueling verification of thermal limit is completed "prior to exceeding 75% rated thermal power" following refueling. | 3.10.2.2 | 3.2.1.1 SR |
| M.2 | Establishes an explicit Completion Time of 15 minutes to reduce thermal power after a determination that $F_Q(Z)$ limits are not met. | 3.10.2.2 | 3.2.1 RA-A.1 |
| M.3 | Adds a new requirement that the Overpower delta T trip setpoint is also reduced by the same percentage of RTP that the measured value of $F_Q(Z)$ exceeds its limit within 72 hours. | 3.10.2.2 | 3.2.1 LCO 3.2.1 RA-A.1 3.2.1 RA-A.3 |
| ITS SECTION 3.2.2 - NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (F_{AH}^N) | | | |
| M.1 | Requires that the post refueling verification of thermal limit is completed "prior to exceeding 75% rated thermal power" following refueling. | 3.10.2.2 | 3.2.2.1 SR |
| M.2 | Requires that reactor power be reduced to < 50% RTP within 4 hours when FN delta H limits are not met. CTS requires that power be reduced only by the amount the FN delta H exceeds specified limits. | 3.10.2.2.2 | 3.2.2 RA-A.1.1 3.2.2 RA-A.1.2.1 |
| M.3 | Requires that power range neutron flux trip setpoint is reduced to less than or equal to 55% RTP within 72 hours if FN delta H limits are not met. CTS requires that power be reduced only by the amount the FN delta H exceeds specified limits. | 3.10.2.2.2 | 3.2.2 RA-A.1.2.2 |
| M.4 | Establishes explicit requirements for returning to full power following a determination that limits for FN delta H are not met. | 3.10.2.2.2 | 3.2.2 RA-A.1 3.2.2 RA-A.2 3.2.2 RA-A.3 |
| M.5 | Adds explicit requirement to re-verify within 24 hours that FN delta H requirements are met whenever FN delta H limits are not met even if FN delta H is restored to within limits before a power reduction is required. | 3.10.2.2.2 | 3.2.2 RA-A.1.2.1 3.2.2 RA-A.1.2.2 3.2.2 RA-A.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--------------------------|--|
| ITS SECTION 3.2.3 - AXIAL FLUX DIFFERENCE (AFD) | | | |
| M.1 | Limits allowance that AFD does not have to be maintained within the specified band during excore calibration procedures to a maximum of 16 hours during each SR interval (i.e., 92 days). | 3.10.2.4 | 3.2.3 LCO 3.3.1.6 SR |
| M.2 | Adds explicit requirement for periodic verification that AFD is within required limits when the AFD monitor alarm is functional. | 3.10.2 3.10.3 | 3.2.3.1 SR |
| M.3 | Adds requirement to reduce power to < 15% RTP if power is not reduced to < 50% RTP within 30 minutes of a determination that AFD limits are not being met when operation > 50% RTP. | 3.10.2.7 3.10.2.7.2 | 3.2.3 APP 3.2.3 RA-C.1 |
| ITS SPECIFICATION 3.2.4 - QUADRANT POWER TILT RATIO (QPTR) | | | |
| M.1 | Requires re-verification of QPTR within 12 hours (versus 24 hours in the CTS) after the first determination that QPTR limits are exceeded. Adds a new requirement to re-verify QPTR every 12 hours thereafter until completion of an evaluation that demonstrates continued operation is acceptable. | 3.10.3.1.a 3.10.3.1.b | 3.2.4 RA-A.1 3.2.4 RA-A.2 |
| M.2 | Establishes a requirement for accelerated verification that ITS LCO 3.2.1 (FQ(Z)) and ITS LCO 3.2.2 (FN delta H) are being met whenever reactor power has been reduced because QPTR limits were not being met. | 3.10.3 | 3.2.1 LCO 3.2.2 LCO 3.2.4 RA-A.3 |
| M.3 | Establishes an explicit requirement to verify QPTR, as indicated by the NIS excore channels, is within its limits every 7 days. | 3.10.2.9 3.10.3 | 3.2.4.1 SR 3.2.4.2 SR |

TABLE M - ADMINISTRATIVE CHANGES TO THE CTS

ITS SECTION 3.3 - INSTRUMENTATION

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|---|---|
| ITS SECTION 3.3.1- REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION | | | |
| M.1 | Incorporates explicit limits that are currently in the CTS Bases for the amount of time that an RPS train or channel (other than an RCP breaker position channel) can be bypassed for testing consistent with WCAP-14333-P-A, Rev. 1, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times". Limits the amount of time that a reactor breaker position channel may be bypassed to 4 hours based on WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation Systems." | 3.5.3 3.5.4 | 3.3.1 RA-D.1 3.3.1 RA-E.1 3.3.1 RA-K.1 3.3.1 RA-L.1 3.3.1 RA-M.1 |
| M.2 | Adds a requirement for 2 channels of reactor manual trip function to be Operable and a requirement to restore a channel to Operable status within 48 hours if one of the two reactor manual trip functions becomes inoperable. | T 3.5-2, No.1 T 4.1-1, No.42 | 3.3.1 RA-B.1 3.3.1 RA-B.2 3.3.1 RA-C.1 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 1 |
| M.3 | Expands the Applicability for Manual Reactor Trip Function to include Mode 3, 4 and 5 if the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted. | T 3.5-2 | 3.3.1 RA-C.2.1 3.3.1 RA-C.2.2 T 3.3.1-1 No. 1 |
| M.4 | Adds an explicit requirement for periodic calibration of the source, intermediate and power range nuclear detectors. | T 4.1-1, No.1 T 4.1-1, No.2 T 4.1-1, No.3 | 3.3.1.11 SR 3.3.1.12 SR |
| M.5 | Adds an explicit requirement for immediate suspension of reactivity addition when all required IRM channels are inoperable and explicit requirement for immediately opening reactor trip breakers if both SRM channels are inoperable. | T 3.5-2, No.3 T 3.5-2, No.4 | 3.3.1 RA-G.1 3.3.1 RA-I.1 |
| M.6 | Adds a requirement to perform a COT for ITS 3.3.1, Function 4, SRM Neutron Flux (trip), within 4 hours after reducing power below the P-6 (IRM Flux interlock) setpoint and to perform a COT for ITS 3.3.1, Function 4, within 4 hours after entering Mode 3 from Mode 2. | T 4.1-1, No.2 | 3.3.1.7 SR 3.3.1.8 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|---|----------------------------------|---|
| M.7 | Not Used. | NA | NA |
| M.8 | Adds a requirement for Operability and Surveillance testing of ITS 3.3.1, Function 14, SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch because this Function is assumed to provide a diverse and/or redundant reactor trip initiation in conjunction with SG Water Level Low (ITS 3.3.1, Function 13, Steam Generator (SG) Water Level low-low) in response to a loss of feedwater event. | 3.5 4.1 | T 3.3.1-1 No. 14 |
| M.9 | Adds an explicit requirement to verify Operability by actuation of the end device associated with the turbine trip function every 24 months. | T 4.1-1, No.27 | 3.3.1.14 SR |
| M.10 | Adds an explicit requirement for Operability for the P-6, P-7, P-8, P-10 and Turbine First Stage Pressure (P-7 Input) interlocks which augments existing CTS requirements. | 2.3.2.A 2.3.2.B | T 3.3.1-1 No. 17a T 3.3.1-1 No. 17b T 3.3.1-1 No. 17c T 3.3.1-1 No. 17d T 3.3.1-1 No. 17e 3.3.1 RA-P.1 3.3.1 RA-Q.1 |
| M.11 | Adds new requirements for reactor trip breakers and (RPS) automatic trip to be Operable in Mode 3, 4 and 5 if the Rod Control System is capable of rod withdrawal or if one or more rods are not fully inserted. | T 3.5-2, No.18 T 3.5-2, No.19 | 3.3.1 RA-C.1 3.3.1 RA-C.2 T 3.3.1-1 No. 18 T 3.3.1-1 No. 20 |
| M.12 | Adds a 4 hour limit for bypassing one RCP breaker position channel for test to be consistent with WCAP-14333-P-A, Rev. 1, Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times because the 12 hours bypass allowance of the WCAP does not apply to the Reactor Coolant Pump (RCP) Breaker Position RPS function. | 3.5.3 3.5.4 | 3.3.1 RA-L.1 |
| M.13 | Adds requirements for (Reactor Trip) Safety Injection (SI) Input from ESFAS which was deleted as part of CTS Amendment 212, dated November 30, 2000. | 3.5 4.1 | T 3.3.1-1 No. 16 |
| M.14 | Reduces the amount of time to reach Mode 3 (or exit the applicable Mode or plant condition) from 7 hours in CTS 3.0.1 to 6 hours in ITS 3.3.1 when the minimum level of redundancy not restored within the AOT because 6 hours is a reasonable time, based on operating experience, to place the unit in Mode 3 (or exit the applicable Mode or plant condition) from full power in an orderly manner and without challenging unit systems. | 3.0.1 T 3.5-2 | 3.3.1 |
| M.15 | Establishes explicit statements to require Operability of ITS 3.3.1, Functions 10.a and 10.b, Reactor Coolant Pump (RCP) Breaker Position, which are not explicitly stated in the CTS but are implicit in the requirement for CTS Table 3.5-2, Item 13, 6.9 kV Bus Underfrequency, that relies on the RCP Breaker Position Function to operate. | 2.3.2.B T 3.5-2, No.13 | T 3.3.1-1 No. 10a T 3.3.1-1 No. 10b |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--|--|
| M.16 | Adds a specific requirement to perform a COT for the IRM within 12 hours after reducing power below the P-10 setpoint and adds a new requirement to perform a COT for the SRM within 4 hours after reducing power below the P-6 setpoint. | 4.1.c T 4.1-1, No.2 T 4.1-1, No.3 | 3.3.1.7 SR 3.3.1.8 SR T 3.3.1-1 No. 4 |
| M.17 | Adds Operability requirements for the Source Range Trip function. Two channels are required to be Operable if the Rod Control System is capable of rod withdrawal or one or more rods are not fully withdrawn when in Modes 3, 4 and 5. If one of the two required SRM channels is not Operable, restoration within 48 hours is required. If both required channels are not Operable, ITS will require the reactor trip breakers be opened immediately. | 3.5 | T 3.3.1-1 No. 4 |
| M.18 | Adds new requirements that both installed channels of the Source Range (SRM) Flux trip are Operable (versus only one channel required by CTS) whenever the SRM is required to be Operable and that both installed channels of the Intermediate Range (IRM) Flux trip are Operable (versus only one channel required by CTS) whenever the IRM is required to be Operable. | T 3.5-2, No.3 T 3.5-2, No.4 | T 3.3.1-1 No. 3 3.3.1 RA-F.1 3.3.1 RA-F.2 T 3.3.1-1 No. 4 3.3.1 RA-H.1 |
| ITS SPECIFICATION 3.3.2 - ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION | | | |
| M.1 | Incorporates explicit limits that are currently in the CTS Bases for the amount of time that an ESFAS channel can be bypassed for testing. | 3.5.3 3.5.4 | 3.3.2 RA-D.1 3.3.2 RA-E.1 |
| M.2 | Requires that two channels (versus one channel in the CTS) of each ESFAS manual initiation function are Operable and requires that the inoperable channel is restored to Operable within 48 hours whenever one of the two required channels is inoperable. | T 3.5-3 T 3.5-4 | T 3.3.2-1 No. 1a T 3.3.2-1 No. 2a T 3.3.2-1 No. 3a1 T 3.3.2-1 No. 3b1 T 3.3.2-1 No. 4a |
| M.3 | Requires Operability of 2 channels of high steam flow per steam line on all 4 steam lines (versus the CTS requirement of 2 channels of high steam flow per steam line on only 3 of 4 steam lines) consistent with the assumptions of WCAP-10271 and WCAP-14333 which justified a 72 hour allowable out of service time for an inoperable channel and reducing the frequency of channel operational tests of these channels from monthly to quarterly. | T 3.5-3, No.1e T 3.5-4, No.2a | T 3.3.2-1 No. 1f T 3.3.2-1 No. 1g T 3.3.2-1 No. 4d T 3.3.2-1 No. 4e |
| M.4 | Adds requirement for Operability and Surveillance testing of ITS 3.3.2, Function 7, ESFAS Interlock - Pressurizer Pressure, to ensure that ITS 3.3.2, Function 1.d, Safety Injection - Pressurizer Pressure - Low, is automatically unblocked when RCS pressure is increased above the pressure where ITS 3.3.2, Function 1.d, is required to actuate on decreasing RCS pressure. | T 3.5-3, No.1d T 3.5-3, No.1d* T 4.1-1, No.7 | T 3.3.2-1 No. 7 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|---|--|
| M.5 | Establishes requirements for ITS 3.3.2, Function 6.d. Auxiliary Feedwater-Station Blackout (SBO) (Undervoltage Bus 5A or 6A), by referencing LCO 3.3.5 except for Applicability. This is acceptable because requirements of the SBO function for the number of OPERABLE channels, the Required Actions when one or more channels are inoperable, Surveillance Testing of SBO channels, and the allowable values for LCO 3.3.2, Function 6.d, Auxiliary Feedwater SBO (Emergency Bus 5A or 6A) are the same as those required by LCO 3.3.5, "LOP DG Start Instrumentation." | T 3.5-3, No.4c | T 3.3.2-1 No. 6d |
| M.6 | Increases frequency for channel check for containment pressure from shiftly (i.e., every 24 hours) to 12 hours. | T 4.1-1, No.18a | 3.3.2.1 SR |
| M.7 | Adds requirements for a channel check, channel operational test and channel calibration of the high steam flow input to the ESFAS safety injection and steam line isolation functions consistent with the assumptions in WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990, and WCAP-14333-P-A, Rev.1, Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times. | T 3.5-3, No.1e T 3.5-4, No.2a T 4.1-1 | 3.3.2.1 SR 3.3.2.4 SR 3.3.2.7 SR |
| M.8 | Adds requirement for Operability and Surveillance testing of ITS 3.3.2, Function 5.b, Feedwater Isolation - SG Water Level (high-high). CTS does not explicitly require that this function is Operable. | 3.5 | T 3.3.2-1 No. 5b |
| M.9 | Adds requirement that 1 channel of ITS 3.3.2, Function 6.e. Auxiliary Feedwater - Trip of Main Boiler Feedwater Pump, is Operable for each operating main boiler feedwater pump (versus 1 channel for either pump). | T 3.5-3 | T 3.3.2-1 No. 6e 3.3.2 RA-H.2.1 |
| M.10 | Establishes Completion Times of 6 hours (versus 7 hours in CTS) for the plant to be to be in Mode 3 and 36 hours (versus 37 hours in CTS) for the plant to be in Mode 5 if requirements for minimum number of channels for an ESFAS Function are not met and Required Actions are not performed within the specified Completion Time. | T 3.5-3 footnote1 T 3.5-3 footnote2 T 3.5-4 footnote1 | 3.3.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|---|---|
| ITS SPECIFICATION 3.3.3 - POST ACCIDENT MONITORING (PAM) INSTRUMENTATION | | | |
| M.1 | Adds requirement for one additional channel of the PAM instrument functions currently listed in Technical Specifications and specifies 30 days to restore an inoperable channel or justify continued operation based on the availability of alternate indication if a channel becomes inoperable. | T 3.5-5, No.7 T 3.5-5, No.10 | 3.3.3, Function 8 3.3.3, Function 9 3.3.3 RA-A.1 5.6.6 |
| M.2 | Eliminates the CTS allowance permitting a 48 hour delay before the plant is placed in a Mode where Post Accident Monitoring requirements are not Applicable when those requirements are not met. | T 3.5-5, Action 1 | 3.3.3 RA-E.1 3.3.3 RA-E.2 |
| M.3 | Eliminates the allowance permitting SG level instruments to be used as a substitute for AFW flow rate indefinitely and changes the presentation of requirements for Auxiliary Feedwater Flow Rate from 1 channel per steam generator to 4 channels. | T 3.5-5, No.6 T3.5-5, Note***** | 3.3.3, Function 19 |
| M.4 | Reduces the time that both channels of Reg. Guide 1.97 Function Reactor Coolant System Subcooling Margin Monitor may be inoperable before a reactor shutdown is required from 37 days to 7 days. | T 3.5-5, No.2 T 3.5-5, Action 1 T 3.5-5, Action 2 | 3.3.3, Function 21 |
| M.5 | ITS LCO 3.3.3 adds requirements for Operability, allowable out of service time and periodic Channel Checks and Calibration of the following instruments which were identified as either a Type A and/or Category I variable in the Indian Point 2 NRC Reg. Guide 1.97 Review of Accident Monitoring Instrumentation but which are not currently required by Technical Specifications. | 3.5 | 3.3.3 RA-A.1 3.3.3.1 SR 3.3.3.3 SR |
| M.6 | Not Used. | NA | NA |
| M.7 | Adds requirement to place the plant in Mode 3 in 6 hour and Mode 4 in 12 hours if there is a loss of function of the Containment Pressure (high range) faction of the Post Accident Monitoring Instrumentation. | T 3.5-5, No. 7 T 3.5-5, Note 3 | 3.3.3, Function 8 3.3.3 RA-A.1 3.3.3 RA-E.1 3.3.3 RA-E.2 |
| M.8 | Increases the requirement for number of channels of RCS Subcooling Margin Monitor required by Technical Specifications from 1 Operable channel to 2 Operable channels. | T 3.5-5, No. 2 T 3.5-5, Action 2 | 3.3.3, Function 21 3.3.3 RA-A.1 3.3.3 RA-B.1 |
| ITS SPECIFICATION 3.3.4 - REMOTE SHUTDOWN | | | |
| M.1 | Adds requirements for instrumentation and controls necessary to place and maintain the unit in Mode 3 for an extended period of time from a location other than the control room. | None | 3.3.4 T B3.3.4-1 |
| M.2 | Adds Required Actions if one or more of the remote shutdown functions becomes inoperable. | None | 3.3.4 RA-A.1 3.3.4 RA-B.1 3.3.4 RA-B.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|---|----------------------------------|
| M.3 | Adds requirement that a Channel Check of remote shutdown functions be performed every 31 days of those channels which are normally energized. | None | 3.3.4.1 SR |
| M.4 | Adds requirement to verify every 24 months that each required remote shutdown control circuit and transfer switch performs the intended function. | None | 3.3.4.2 SR T B3.3.4-1 |
| M.5 | Adds requirement that a Channel Calibration be performed every 24 months on each remote shutdown instrumentation channel (with the exception of the neutron detectors). | None | 3.3.4.3 SR T B3.3.4-1 |
| M.6 | Adds requirement for verification of proper operation of the local open/closed position indication on each reactor trip breaker and reactor trip bypass breaker every 24 months. | None | SR 3.3.4.4 T B3.3.4-1, No. 1b |
| ITS SPECIFICATION 3.3.5 - LOSS OF POWER (LOP) DIESEL GENERATOR (DG) START INSTRUMENTATION | | | |
| M.1 | Expands the applicability for the loss of power (LOP) DG start instrumentation from whenever the plant is not in cold shutdown to whenever a DG is required to be Operable. | T 3.5-1, No.8a T 3.5-3, No.3a 3.5.1 | 3.3.5 APP |
| M.2 | Not Used. | NA | NA |
| M.3 | Adds explicit requirement for the Operability of two channels per bus of the 480 V Bus Degraded Voltage Function. | T 3.5-3, No.3.b | 3.3.5 RA-F.1 |
| M.4 | Establishes requirements for 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation to require the following: Three channels per bus of the Station Blackout (SBO) Function on buses 5A and 6A when in MODE 1, 2, 3 and 4; and Three channels per bus of the Station Blackout (SBO) Function on either bus 5A or 6A when in MODE 5 and 6. | T 3.5-3, No. 4.c | 3.3.5 |
| M.5 | Added new Conditions and Required Actions for inoperable channels, loss of function and extended loss of redundancy of the ITS 3.3.5, 480 V Bus Station Blackout (SBO) Function - LOP DG Start Instrumentation that address new requirements for the Applicability of this Function and new requirements for the number of channels required to be Operable. | T 3.5-3 | 3.3.5 |
| M.6 | Establishes new requirement that both channels of the Undervoltage Function associated with each 480 V bus are required to be Operable to provide redundant instrumentation needed to ensure that each DG will start and load when required. | T 3.5-3, No. 3.a | 3.3.5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|--------------------------|-------------------------------------|
| ITS SPECIFICATION 3.3.6 - CONTAINMENT PURGE SYSTEM AND PRESSURE RELIEF LINE ISOLATION INSTRUMENTATION | | | |
| M.1 | <p>Adds a requirement for the Containment Radiation Monitor (R-42) and Particulate Containment Radiation Monitor (R-41) to be Operable in Modes 1, 2, 3 and 4 regardless of the status of the containment fan cooler condensate flow monitor.</p> <p>Adds a requirement that an inoperable channel be restored to Operable within 7 days when one of the two channels is inoperable.</p> | T 3.5-3, No. 4a 3.1.F | 3.3.6 RA-A.1 3.3.6 RA-B.1 |
| M.2 | Establishes an allowable value for the Containment Purge System and Pressure Relief Line Isolation signal generated by Containment Radiation Monitor (R-42) and Particulate Containment Radiation Monitor (R-41). | T 3.5-4, No 4a | T 3.3.6-1 |
| ITS SPECIFICATION 3.3.7 - CONTROL ROOM VENTILATION (CRVS) | | | |
| M.1 | Reduces the allowable out of service time for loss of CRVS safety function, including actuation instrumentation, from 3.5 days to 72 hours. | 3.3.H.1 3.3.H.2 | 3.3.7 LCO 3.3.7 RA-A.1 3.7.10 |
| M.2 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the control room ventilation system actuation instrumentation is not restored to an operable status within the time period specified. | 3.3.H.2 | 3.3.7 RA-B.1 3.3.7 RA-B.2 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|------------------------|--|
| ITS SPECIFICATION 3.4.1 - RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS | | | |
| M.1 | Expands Applicability for RCS pressure, temperature and flow limits from "pertain to four loop steady state operation at power levels greater than 98% of rated full power" to Mode 1 and requires that the plant be placed outside this expanded Applicability within 6 hours if limits are not met. | 3.1.G | 3.4.1 APP 3.4.1 RA-B.1 |
| M.2 | Adds clarification that verification every 24 months that RCS total flow is within specified limits is accomplished using a "precision heat balance." | 3.1.G T 4.1-1, No.5 | 3.4.1.4 SR |
| ITS SPECIFICATION 3.4.2 - RCS MINIMUM TEMPERATURE FOR CRITICALITY | | | |
| M.1 | Establishes more restrictive limit for minimum temperature for criticality consistent with accident analysis assumptions. | 3.1.C.2 | 3.4.2 LCO |
| ITS SPECIFICATION 3.4.3 - RCS PRESSURE AND TEMPERATURE (P/T) LIMITS | | | |
| M.1 | Establishes explicit requirements and completion times for restoration of pressure and temperature limits and for subsequent determinations that the RCS is acceptable for continued operation after any of these limits are violated. | 3.1.B | 3.4.3 RA-A.1 3.4.3 RA-A.2 3.4.3 RA-B.1 3.4.3 RA-B.2 3.4.3 RA-C.1 3.4.3 RA-C.2 |
| M.2 | Establishes explicit requirements and frequency for verification (i.e. every 30 minutes) that RCS heatup and cooldown is performed within the limits in Figure 3.4.3-1, "Heatup Limitations for the Reactor Coolant System (RCS) and Hydrostatic and Inservice Leak Testing Limitations for the RCS," and Figure 3.4.3-2, "Cooldown Limitations for the RCS (including RCS cooldown following RCS Inservice leak and hydrostatic testing)." | 3.1.B.1 | 3.4.3.1 SR F 3.4.3-1 F 3.4.3-2 3.4.2 LCO |
| ITS SPECIFICATION 3.4.4 - RCS LOOPS - MODES 1 AND 2 | | | |
| M.1 | Expands the LCO Applicability from "during power operation" to "Modes 1 and 2" to ensure 4 RCPs are in operation during all normal operations and whenever there is the potential for a transient or accident that assumes all RCPs are in operation. | 3.1.A.1 | 3.4.4 APP |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|---|--|
| M.2 | Adds an explicit statement that the plant be in Mode 3 in 6 hours if 4 RCPS are not in operation when required. This reduces the amount of time allowed to reach Mode 3 from 7 hours to 6 hours. | 3.0.1 3.1.A.1 | 3.4.4 RA-A.1 |
| M.3 | Adds requirement for periodic verification that 4 RCPs are in operation during Modes 1 and 2. | 3.1.A.1 | 3.4.4.1 SR |
| M.4 | Deletes allowance that "one reactor coolant pump may be out of service for testing or repair purposes for a period not to exceed four hours" during power operation. | 3.1.A.1.b | 3.4.4 |
| ITS SPECIFICATION 3.4.5 - RCS LOOPS MODE 3 | | | |
| M.1 | Adds requirement for periodic verification (every 12 hours) that the required minimum number of required RCS loops are in operation. | T 3.1.A-1 | 3.4.5.1 SR |
| M.2 | Adds specific acceptance criteria for the periodic verification that SG water level is sufficient to support the SG decay heat removal function in Mode 3. | 3.1.A.2 T 4.1-1, No.11 | 3.4.5.2 SR |
| M.3 | Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RCP that is not in operation. | T 3.1.A-1(1) | 3.4.5.3 SR |
| M.4 | Limits the use of the allowance that all reactor coolant pumps used for redundant decay heat removal in Mode 3 may be secured for one hour to no more than once in any 8 hour period. | T 3.1.A-1(1) | 3.4.5 LCO Note |
| M.5 | Replaces CTS requirement to "immediately initiate action to bring RCS temperature to 350°F" when neither of the two required RCS loops are Operable and/or no RCS loop is in operation with ITS requirements to immediately "suspend all operations involving a reduction of RCS boron concentration" and "Initiate action to restore one RCS loop to OPERABLE status and operation." | T 3.1.A-1(1) | 3.4.5 RA-D.1 3.4.5 RA-D.2 3.4.5 RA-D.3 |
| M.6 | Deletes note to LCO Applicability stating requirements are applicable "excluding loss of offsite power." | T 3.1.A-1(1) | 3.0.6 LCO 3.4.5 APP |
| ITS SPECIFICATION 3.4.6 - RCS LOOPS MODE 4 | | | |
| M.1 | Adds requirement for periodic verification (every 12 hours) that the required minimum number of RHR or RCS loops are in operation. | T 3.1.A-1(2) | 3.4.6.1 SR |
| M.2 | Requires SG Operability in Mode 4 for each RCS loop if the RCS loop is being credited as one of the redundant methods for decay heat removal. Adds specific acceptance criteria and a requirement for the periodic verification that SG water level is sufficient to support the SG decay heat removal in Mode 4 if the associated RCS loop is being credited for decay heat removal. | 3.1.A.2 T 3.1.A-1(2) T 4.1-1, No.11 | 3.4.6.2 SR |
| M.3 | Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RCP or RHR pump that is not in operation. | T 3.1.A-1(2) | 3.4.6.3 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------------------|---|
| M.4 | Limits use of the allowance that all RCPs and/or RHR pumps to be de-energized for up to 1 hour in Mode 4 to once in any 8 hour period. | T 3.1.A-1(2) | 3.4.6 LCO Note 1 |
| ITS SPECIFICATION 3.4.7 - RCS LOOPS MODE 5, LOOPS FILLED | | | |
| M.1 | Adds requirement for periodic verification (every 12 hours) that the required RHR loop is in operation. | T 3.1.A-1(3) | 3.4.7.1 SR |
| M.2 | Requires SG Operability in Mode 5 for each RCS loop if the RCS loop is being credited as one of the redundant methods for decay heat removal. Adds specific acceptance criteria and a requirement for the periodic verification that SG water level is sufficient to support the SG decay heat removal in Mode 5 if the associated RCS loop is being credited for decay heat removal. | 3.1.A.2 T 3.1.A-1(3) | 3.4.7 LCO 3.4.7 RA-A.2 3.4.7 RA-B.2 |
| M.3 | Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RHR pump that is not in operation. | T 3.1.A-1(3) | 3.4.7.3 SR |
| M.4 | Limits the use of the allowance that all RHR pumps used for redundant decay heat removal in Mode 5 may be secured for one hour to no more than once in any 8 hour period. | T 3.1.A-1(3) | 3.4.7 LCO Note 1 |
| M.5 | Eliminates use of reactor coolant pumps (RCPs) as one or both of the required decay heat removal systems when in cold shutdown (i.e., Mode 5) because RCPs and the associated steam generators may not be able to maintain RCS temperature within cold shutdown limits. | T 3.1.A-1(3) | 3.4.7 LCO |
| M.6 | Eliminates the option for unlimited use of a temporary decay heat removal system in place of one or both of the redundant required RHR loops. | T 3.1.A-1(4) | 3.4.7 LCO |
| ITS SPECIFICATION 3.4.8 - RCS LOOPS MODE 5, LOOPS NOT FILLED | | | |
| M.1 | Differentiates between cold shutdown (i.e., Mode 5) with loops filled and cold shutdown with loops not filled when establishing requirements for redundant decay heat removal capability. Using 2 SGs and natural circulation as the backup decay heat removal system is not permitted in cold shutdown with loops not filled. | T 3.1.A-1(3) | 3.4.8 LCO 3.4.7 LCO 3.4.6 LCO |
| M.2 | Adds requirement for periodic verification (every 12 hours) that the required RHR loop is in operation. | T 3.1.A-1(3) | 3.4.8.1 SR |
| M.3 | Adds requirement for periodic verification (every 7 days) that breaker alignment is correct and power is available to any required RHR pump that is not in operation. | T 3.1.A-1(3) | 3.4.8.2 SR |
| M.4 | Reduces the time that all RHR pumps used for redundant decay heat removal may be secured when in Mode 5 with loops not filled from 1 hour to 15 minutes and limits the use of this allowance to situations when switching from one RHR pump to the other. | T 3.1.A-1(3) | 3.4.8 LCO Note 1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|----------------------|--|
| M.5 | Eliminates use of reactor coolant pumps (RCPs) as one or both of the required decay heat removal systems when in cold shutdown and RCS loops are not filled (i.e., Mode 5 with loops not filled) because RCPs cannot be operated when the loops are not filled and use of SG for decay heat removal will not be able to maintain RCS temperature within cold shutdown limits. | T 3.1.A-1(3) | 3.4.8 LCO |
| M.6 | Eliminates the option for unlimited use of a temporary decay heat removal system in place of one or both of the redundant required RHR loops. | T 3.1.A-1(4) | 3.4.8 LCO |
| M.7 | Establishes new restriction that "No draining operations to further reduce the RCS water volume are permitted" when both RHR pumps are secured for pump switching when in Mode 5 with loops not filled. | T 3.1.A-1(3) | 3.4.8 LCO Note 1 |
| M.8 | Establishes the explicit requirements to "Initiate action to restore RHR loop to Operable status" if one RHR loop inoperable and to "Suspend all operations involving reduction in RCS boron concentration and initiate action to restore one RHR loop to Operable status and operation" if a required RHR loop is inoperable or no RHR loop is in operation. | T 3.1.A-1(3) | 3.4.8 RA-A.1 3.4.8 RA-B.1 3.4.8 RA-B.2 |
| ITS SPECIFICATION 3.4.9 – PRESSURIZER | | | |
| M.1 | Increases requirement for pressurizer heaters from one group to two groups and requires that each group is powered from a different safeguards power train to provide redundant heater capability so that natural circulation can always be maintained during hot shutdown with loss of offsite power and a single failure of a DG. Requires plant shutdown if redundant heater capability not restored within 72 hours and immediate plant shutdown when there is less than 150kW of Operable pressurizer heaters. | 3.1.A.6 3.1.A.3.a | 3.4.9.b LCO 3.4.9 RA-B.1 3.0.3 |
| M.2 | Clarifies the CTS 3.1.A.6.b requirement that the plant is placed in hot shutdown condition within 6 hours and "subsequently cooled to below 350°F" when requirements for pressurizer heaters are not met to a requirement to be in Mode 3 (i.e., hot shutdown) within 6 hours and Mode 4 (i.e., below 350°F) within 12 hours. | 3.1.A.6.b | 3.4.9 RA-C.1 3.4.9 RA-C.2 |
| M.3 | Establishes explicit requirement that the plant be in Mode 3 with all rods fully inserted and control rod system incapable of rod withdrawal within 6 hours and in Mode 4 within 12 hours if requirements for pressurizer level are not met. | 3.1.C.4 | 3.4.9 RA-A.1 3.4.9 RA-A.2 3.4.9 RA-A.3 3.4.9 RA-A.4 |
| M.4 | Expands the Applicability requirements for pressurizer level from whenever the reactor is not "subcritical by at least 1%" (i.e., Mode 1 and Mode 2) to Modes 1, 2 and 3. | 3.1.C.4 | 3.4.9 APP |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|---------------------------------------|--|
| M.5 | Adds requirement for periodic verification that the pressurizer heaters are at their design rating so that natural circulation can always be maintained during hot shutdown with loss of offsite power and a single failure of a DG. | 3.1.A.6 | 3.4.9.2 SR |
| ITS SPECIFICATION 3.4.10 - PRESSURIZER SAFETY VALVES | | | |
| M.1 | Expands the Applicability for the Operability of three pressurizer code safety valves from "whenever the reactor is critical" to Modes 1, 2, and 3, and portions of Mode 4 above the LTOP Applicability temperature. Mode 3 and portions of Mode 4 are conservatively included even though analyzed events may not require the safety valves for protection and one pressurizer safety valve is sufficient to accommodate all decay heat. | 3.1.A.3.b | 3.4.10 APP 3.4.12 LCO |
| M.2 | Establishes restrictions (prohibiting critical operation and requiring a cold lift setting adjustment) going above LTOP Applicability temperature if surveillance for pressurizer code safety valve setpoints has not been completed. | 3.1.A.3.b | 3.4.10 APP Note |
| M.3 | Requires that the plant must be in Mode 3 within 6 hours and Mode 4 with any RCS cold leg temperature less than or equal to the LTOP Applicability temperature within 12 hours if requirements for pressurizer safety valves are not met consistent with expanded Applicability. | 3.1.A.3 3.0.1 | 3.4.10 APP 3.4.10 RA-A.1 |
| ITS SPECIFICATION 3.4.11 - PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs) | | | |
| M.1 | Not Used. | NA | NA |
| M.2 | Clarifies that CTS requirement for the reactor to be in hot shutdown (i.e., Mode 3) within the next 6 hours and "subsequently" cooled to below 350°F (i.e., Mode 4) requires the reactor be in Mode 3 within 6 hours and Mode 4 within 12 hours. | 3.1.A.5.d | 3.4.11 RA-D.1 3.4.11 RA-D.2 3.4.11 RA-G.1 3.4.11 RA-G.2 |
| M.3 | Adds new requirement that redundancy for PORV safety function (i.e., venting the pressurizer to mitigate a steam generator tube rupture event) is restored within 7 days. Adds requirement that reactor shutdown be initiated within 4 hours (versus 30 days) if there is a loss of the PORV safety function. | 3.1.A.5 3.16.A 3.16.B 3.16.C | 3.4.11 LCO |
| M.4 | Not used. | NA | NA |
| M.5 | Requires periodic verification that each PORV and its associated block valve can be manually opened and closed to ensure that redundant pressurizer venting capability is available for mitigation of an SGTR and that a redundant isolation valve on each vent line is available to isolate the vent if a valve cannot be closed. | 3.1.A.5 | 3.4.11.1 SR 3.4.11.2 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|---------------------------|---|
| ITS SPECIFICATION 3.4.12 – Low Temperature Overpressure Protection (LTOP) | | | |
| M.1 | Clarifies that LTOP requirements apply whenever "any" RCS cold leg temperature is less than the LTOP Applicability temperature of 280°F. | 3.1.A.4.a T 3.1.A-1(2) | 3.4.12 APP |
| M.2 | Increases the Frequency for verification that block valves are open as required when the associated with PORVs in the overpressure protection mode from "twice weekly with a maximum time between checks of 5 days" to 72 hours (i.e., 3 days) with a maximum time between checks at 1.25 time that interval (i.e., 90 hours or 3.75 days). | 4.18.A | 3.4.12.5 SR 3.0.1 |
| M.3 | Adds a required Frequency of "Within 30 minutes prior to starting any RCP" for RCP starting prerequisites under LTOP conditions to clarify that these prerequisites must be verified within 30 minutes prior to pump start and must be met at the time of the pump start. | T 3.1.A-2 | 3.4.12.8 SR |
| M.4 | Adds requirement that ECCS accumulators are isolated (with power to isolation valve removed) or depressurized when LTOP requirements must be met. Includes Required Actions and Completion Times if an accumulator is not depressurized and isolation valve not de-energized and requirement for periodic verification that accumulator isolation valve is closed and de-energized. | 3.1.A.4 | 3.4.12 APP Note 3.4.12 LCO 3.4.12 RA-B.1 3.4.12 RA-C.1 3.4.12 RA-C.2 3.4.12.3 SR |
| M.5 | Adds an explicit requirement to immediately initiate action to restore requirements for maximum number of HHSI pumps or charging pumps capable of injecting into the RCS and/or restore limits for the combination of pressurizer pressure, pressurizer level and RCS temperature when LTOP is required and requirements are not met. | T 3.1.A-2 | 3.4.12 RA-A.1 3.4.12 RA-A.2 3.4.12 RA-C.1 3.4.12 RA-C.2 |
| ITS SECTION 3.4.13 - RCS OPERATIONAL LEAKAGE | | | |
| M.1 | Superseded by Amendment 211. | NA | NA |
| ITS SPECIFICATION 3.4.14 - RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE | | | |
| M.1 | Adds clarification that PIV leakage acceptance criteria applies to normal operating pressure consistent with ASME requirements. | 4.16.A.5 | 3.4.14.1 SR |
| M.2 | Adds a new requirement to verify that RCS boundary valves 730 and 731 are closed and de-energized every 92 days when in Modes 1, 2 and 3 and in Mode 4 if not in the RHR mode of operation because IP2 does not have independent auto closure interlocks or open permissive interlocks on the RHR suction isolation valves (i.e., RCS boundary valves 730 and 731). | 3.1.F.2.b.(2) 4.16.A.5 | 3.4.14.2 SR |
| M.3 | Add new requirement that testing for gross leakage must be performed within 24 hours following any valve actuation due to automatic or manual action or after any flow through the valve. | 4.16.A.5 | 3.4.14.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|---|--|
| ITS SPECIFICATION 3.4.15 - RCS LEAKAGE DETECTION INSTRUMENTATION | | | |
| M.1 | Eliminates the option of performing a visual inspection of containment every shift if any or all of the required RCS leakage detection instruments are not Operable. | 3.1.F.1.c | 3.4.15 RA-E.1 3.4.15 RA-E.2 3.4.15 RA-F.1 |
| M.2 | Eliminates option that permits the containment fan cooler condensate flow monitor to be inoperable indefinitely with no compensatory action if both the containment atmosphere gaseous radiation monitor and the containment atmosphere particulate radiation monitor are Operable. Adds requirement for compensatory action whenever the containment fan cooler condensate flow monitor is not Operable. | 3.1.F.1.a.(6) | 3.4.15 LCO 3.4.15 RA-C.1 3.4.15 RA-C.2 |
| ITS SPECIFICATION 3.4.16 - RCS SPECIFIC ACTIVITY | | | |
| M.1 | Expands the Applicability for requirements for maximum reactor coolant activity from whenever the reactor is critical to include Mode 2 which includes conditions when K_{eff} is greater than or equal to 0.99 (i.e., during a reactor startup). | 3.1.D.1 | 3.4.16 APP |
| M.2 | Increases Frequency for verification (every 7 days versus monthly) of the gross specific activity and eliminates the explicit requirement to verify gross activity (measurement of total activity in the reactor coolant) at least five days per week. | 3.1.D.1 T 4.1-1, No.1 T 4.1-2, No.1 | 3.4.16.1 SR |
| M.3 | Adds a new limit for both a pre-accident iodine spike (RCS at 60 times the assumed maximum coolant equilibrium concentration limit of 1.0 Ci/gm of Dose Equivalent I-131) and an accident initiated iodine spike (RCS at the assumed maximum coolant equilibrium concentration limit of 1.0 Ci/gm of Dose Equivalent I-131) and requirement for periodic verification that Dose Equivalent I-131 is within these limits which ensure that the radiological consequences after an SGTR are within 10 CFR 50.67 limits . | 3.1.D.1 | 3.4.16.2 SR 3.4.16 RA-A.1 3.4.16 RA-A.2 3.4.16 RA-C.1 |
| M.4 | Adds explicit requirement that the plant be in Mode 3 with average reactor coolant temperature less than 500°F within 6 hours whenever the limit for reactor coolant specific activity is not met. | 3.1.D.1 | 3.4.16 RA-B.1 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.5 - EMERGENCY CORE COOLING SYSTEM (ECCS)

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------|----------------------------|
| ITS SPECIFICATION 3.5.1 - ACCUMULATORS | | | |
| M.1 | Increases Applicability in the CTS from whenever the reactor is critical to the ITS Modes 1 and 2 and Mode 3 when RCS pressure is > 1000 psig. Eliminates ambiguity that requires plant in cold shutdown if inoperable accumulators not restored within specified out of service time. Eliminates exception permitting all accumulators to be inoperable during low temperature physic testing. | 3.3.A.1 | 3.5.1 APP |
| M.2 | Establishes new requirement for periodic verification (every 12 hours) of the existing requirement that each accumulator isolation valve is fully open. | 3.3.A.1.c | 3.5.1.1 SR |
| M.3 | Not Used. | NA | NA |
| M.4 | CTS requires verification of accumulator boron concentration every 31 days with an allowance to extend the interval to 45 days. ITS maintains the requirement to verify accumulator boron concentration every 31 days; however, ITS SR 3.0.2 limits any extension to the 31 day SR interval to 25% (approx. 39 days). | T 4.1-2, No.7 | 3.5.1.4 SR 3.0.2 SR |
| M.5 | Establishes new requirement for periodic verification (every 31 days) that each accumulator isolation valve is fully open with motor operators de-energized. | 3.3.A.1.i | 3.5.1.1 SR 3.5.1.5 SR |
| M.6 | Expands Applicability for having accumulator isolation valve motor operators de-energized in open position from whenever the reactor is critical to Modes 1 and 2 and Mode 3 when RCS pressure is > 2000 psig. | 3.3.A.1.i | 3.5.1.1 SR 3.5.1.5 SR |
| M.7 | Adds requirement for upper limit for RWST boron concentration and periodic verification that this limit is met. CTS established only a lower limit for RWST boron concentration. | 3.3 4.1 | 3.5.1.4 SR 3.5.1 RA-A.1 |
| ITS SPECIFICATION 3.5.2 - ECCS – OPERATING | | | |
| M.1 | Expands applicability from whenever the reactor is critical to Modes 1, 2 and 3 (i.e., above 350°F). Eliminates ambiguity that requires plant in cold shutdown if inoperable ECCS component not restored within specified out of service time. Eliminates exception permitting all ECCS pumps to be inoperable during low temperature physic testing. | 3.3.A.1 | 3.5.2 APP |
| M.2 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when ECCS LCO requirements are not met. | 3.3.A.1 3.3.A.2 | 3.5.2 RA-B.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|-------------------------------------|----------------------------|
| M.3 | Added SR for verification every 7 days that those valves in the ECCS flow path that would render more than one train of ECCS inoperable if mispositioned are in the correct position with power removed. | 3.3.A.1.g 3.3.A.1.h 3.3.A.1.j | 3.5.2.1 SR |
| M.4 | Added SR for verification every 31 days that each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position. | None | 3.5.2.2 SR |
| M.5 | Added SR for verification that each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head in accordance with the Inservice Testing Program. | 4.5.A.1.c | 3.5.2.3 SR |
| M.6 | Added SR to require verification every 24 months that containment sump and recirculation sump suction inlets are unrestricted and otherwise in proper operating condition. | None | 3.5.2.7 SR |
| ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN | | | |
| M.1 | Establishes new requirement for two 50% capacity ECCS high head safety injection pumps and one 100% capacity ECCS RHR subsystem (low head) pump to be OPERABLE in Mode 4 to ensure ECCS flow is available to the core following a DBA in Mode 4. | 3.3.A.1 | 3.5.3 LCO |
| ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST) | | | |
| M.1 | Expands applicability from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown). Eliminates exception permitting RWST to be inoperable during low temperature physics testing. | 3.3.A.1 | 3.5.4 APP |
| M.2 | Adds requirement to maintain RWST temperature within the temperature range identified as initial conditions in the accident analysis. Includes new requirement for verification every 24 hours that RWST temperature is within limits and adds requirement to initiate plant shutdown and cooldown within 8 hours of determination RWST temperature requirement not met. | 3.3 4.1 | 3.5.4 RA-A.1 3.5.4.1 SR |
| M.3 | Adds requirement for upper limit for RWST boron concentration and periodic verification that this limit is met. CTS established only a lower limit for RWST boron concentration. | 3.3.A.1.a 4.1 | 3.5.4.3 SR 3.5.4 RA-A.1 |
| M.4 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when RWST LCO requirements are not met. | 3.3.A.1 3.3.A.2 | 3.5.4 RA-D.2 |
| M.5 | Establishes allowances for extending SR Frequencies that are consistent with NUREG-1431 SR 3.0.2. This change is acceptable because it does not introduce any operation that is un-analyzed while requiring more timely verification that analysis assumptions regarding the Operability of the RWST is satisfied. | T 4.1-2, No 3 | 3.5.4.3 SR 3.0.2 SR |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.6 - CONTAINMENT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------|--|
| ITS SPECIFICATION 3.6.1 - CONTAINMENT | | | |
| M.1 | Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment integrity are not met within the allowable out of service time. | 3.6.A.3 | 3.6.1 RA-B.1 3.6.1 RA-B.2 |
| ITS SPECIFICATION 3.6.2 - CONTAINMENT AIR LOCKS | | | |
| M.1 | Requires that both air lock doors are kept closed when the air lock is not being used for normal entry into or exit from containment. | 1.7.c 3.6.A.1.d | 3.6.2 LCO |
| M.2 | Not Used. | NA | NA |
| M.3 | Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment integrity are not met within the allowable out of service time. | 3.6.A.3 | 3.6.2 RA-D.1 3.6.2 RA-D.2 |
| M.4 | Adds requirement that if one air lock door is inoperable or the air lock door interlock is inoperable; then, the Operable door in the affected air lock must be locked shut within 24 hours and verified locked closed every 31 days thereafter unless the air lock door is in a high radiation area, in which case, administrative verification is acceptable. | 3.6.A.3 | 3.6.2 RA-A.1 3.6.2 RA-A.2 3.6.2 RA-A.3 3.6.2 RA-B.1 3.6.2 RA-B.2 3.6.2 RA-B.3 |
| M.5 | Adds requirement for the Operability and periodic testing of the door interlock mechanism on containment airlocks. | 3.6.A 1.7 | 3.6.2.2 SR |
| M.6 | Adds requirements for compensatory actions for an airlock with an inoperable interlock mechanism equivalent to the compensatory actions for an inoperable airlock door. | 3.6.A 1.7 | 3.6.2 RA-B.1 3.6.2 RA-B.2 3.6.2 RA-B.3 |
| ITS SPECIFICATION 3.6.3 - CONTAINMENT ISOLATION VALVES | | | |
| M.1 | Adds requirement that the reactor be in Mode 3 within 6 hours to the existing requirement to be in Mode 5 within 36 hours if requirements for containment isolation valves are not met within the allowable out of service time. | 3.6.A.3 | 3.6.3 RA-E.1 3.6.3 RA-E.2 |
| M.2 | Not Used. | NA | NA |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|------------------------------------|--|
| M.3 | Adds requirement for periodic verification that penetration flow paths with one or more inoperable containment isolation valves are isolated. Specifies that isolation devices in high radiation areas and isolation devices that are locked, sealed or otherwise secured may be verified by use of administrative means. | 3.6.A.3 | 3.6.3 RA-A.1 3.6.3 RA-A.2 3.6.3 RA-B.1 3.6.3 RA-C.1 3.6.3 RA-C.2 |
| M.4 | Adds requirement that non-automatic containment isolation valves that are not normally open during plant operation may be opened only under administrative controls consisting of stationing at the valve controls a dedicated operator in continuous communication with the control room. | 3.6.A.1.a T 3.6-1 | 3.6.3 RA-Note 1 |
| M.5 | Requires that restrictions on the opening angle and closure time for the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves apply in Modes 1, 2, 3 and 4 and not only "during power operation." | 3.6.A.1 3.6.A.2 | 3.6.3.5 SR 3.6.3.7 SR |
| M.6 | Adds requirement for verification every 24 months that the containment purge supply and exhaust isolation valves and the pressure relief line isolation valves are set to limit valve disk travel to no greater than 60 degrees open. | 3.6.A.2.a | 3.6.3.7 SR |
| M.7 | Adds requirement for periodic verification that the containment purge supply and exhaust isolation valves are closed and that the pressure relief line isolation valves are closed or, if open, open only for approved reasons. | 3.6.A.2.b | 3.6.3.1 SR 3.6.3.2 SR |
| M.8 | Adds requirement for periodic verification that manual containment isolation valves and blind flanges are positioned or installed as required. | 1.7.a 3.6.A 3.6.A.1.a 4.4 | 3.6.3.3 SR 3.6.3.4 SR |
| M.9 | Adds requirement for periodic verification that the isolation time of each automatic containment isolation valve is within limits. | 3.6.3.2.a | 3.6.3.5 SR |
| M.10 | Changes a CTS 3.0.1 requirement that the reactor must be in hot shutdown (i.e., Mode 3) within the next 7 hours and cold shutdown (i.e., Mode 5) within 37 hours unless the containment penetration is isolated in the interim to an ITS requirement to isolate the penetration within 1 hour or the reactor must be in Mode 3 within the next 6 hours (7 hours from discovery) and Mode 5 within 36 hours (37 hours from discovery) unless the containment penetration is isolated in the interim. Explains that ITS 3.6.3, Required Actions B.1, E.1 and E.2, require Actions identical to those required by CTS 3.0.1 for a Condition where CTS 3.6.A.3.a defaults to CTS 3.0.1. | 3.0.1 3.6.A.3.a | 3.6.3 RA-B.1 3.6.3 RA-E.1 3.6.3 RA-E.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------------------------|---|
| ITS SPECIFICATION 3.6.4 - CONTAINMENT PRESSURE | | | |
| M.1 | Expands applicability for limits on containment pressure from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown). | 3.6.B | 3.6.4 APP 3.6.4 RA-B.1 3.6.4 RA-B.2 |
| ITS SPECIFICATION 3.6.5 - CONTAINMENT AIR TEMPERATURE | | | |
| M.1 | Adds a new requirement that containment average air temperature shall be less than or equal to 130°F when in Modes 1, 2, 3 and 4 consistent with assumptions used in the containment analysis in UFSAR 14.3.5. | 3.6.C | 3.6.5 LCO |
| M.2 | Adds requirement for verification every 24 hours that containment average air temperature is less than or equal to 130°F and greater than 50°F when in Modes 1, 2, 3 and 4. | 3.6.C | 3.6.5.1 SR |
| ITS SPECIFICATION 3.6.6 - CONTAINMENT SPRAY SYSTEM AND CONTAINMENT FAN COOLER (CFU) SYSTEM | | | |
| M.1 | Expands the Applicability for the containment spray system and the containment fan cooler system so that it is consistent with requirements for containment Operability. Eliminates ambiguity between CTS Applicability and CTS Actions by ensuring that the Actions are consistent with the ITS Applicability. | 3.3.B.1 3.3.B.2 3.6.A.1 | 3.6.6 APP |
| M.2 | Requires that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) if the requirements for the containment spray system or the containment fan cooler system are not met within the specified completion time. | 3.3.B.2 | 3.6.6 RA-B.1 |
| M.3 | Reduces the time allowed to reach cold shutdown (i.e., Mode 5) when requirements for the containment fan cooler Operability are not met from approximately 78 hours to 36 hours. | 3.3.B.2 | 3.6.6 RA-E.2 |
| M.4 | Establishes a 10 day limit for the maximum consecutive time that the plant may be without the full complement of containment spray or fan cooler unit capability. | 3.3.B.2 | 3.6.6 RA-A.1 3.6.6 RA-C.1 |
| M.5 | Adds requirement for verification every 31 days that each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position. | 4.5.B | 3.6.6.1 SR |
| M.6 | Adds requirement for verification every 92 days that cooling water (i.e., service water) flow to each fan cooler unit is greater than or equal to the volume assumed in the accident analysis. | 4.5.D | 3.6.6.3 SR |
| M.7 | Adds explicit requirement for verification that each containment spray pump's developed head in accordance with requirements in the Inservice Testing Program. | 4.5.B | 3.6.6.4 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|-------------------------------|------------------------------|
| M.8 | Eliminates statement containment spray testing is "performed with the isolation valves in the spray supply lines at the containment blocked closed" and requires that each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position (i.e., valves that would not actuate on an actual signal), actuates to the correct position. | 4.5.B.1 | 3.6.6.5 SR 3.6.6.6 SR |
| M.9 | Adds a requirement to verify every 24 months that each containment fan cooler unit (FCU) starts automatically on an actual or simulated actuation signal. | 4.5 | 3.6.6.7 SR |
| M.10 | Clarifies with explicit Completion Times that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) and Mode 5 within 84 hours (versus cooldown using normal operating procedures) if the requirements for the containment spray system are not met within the specified completion time. | 3.3.B.2 | 3.6.6 RA-B.1 3.6.6 RA-B.2 |
| M.11 | Revised acceptance criteria for the verification containment spray nozzles from "spray nozzles shall be tested for proper functioning" which requires proper functioning of sufficient nozzles to meet the containment spray safety function to a requirement to "verify that each containment spray nozzle is unobstructed" which will require all containment spray nozzles are unobstructed. | 4.5.B.2 | SR 3.6.6.8 |
| ITS SPECIFICATION 3.6.7 – RECIRCULATION PH CONTROL SYSTEM | | | |
| M.1 | Expands the Applicability for the recirculation pH control system consistent with requirements for containment Operability. Eliminates ambiguity between CTS Applicability and CTS Actions by ensuring that the Actions are consistent with the ITS Applicability. | 3.3.B.1 3.3.B.2 3.6.A.1 | 3.6.7 APP |
| M.2 | Clarifies with explicit Completion Times that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) and Mode 5 within 84 hours (versus cooldown using normal operating procedures) if the requirements for the recirculation pH control system are not met within the specified completion time. | 3.3.B.2 | 3.6.7 RA-B.1 3.6.7 RA-B.2 |
| ITS SPECIFICATION 3.6.8 - HYDROGEN RECOMBINERS | | | |
| M.1 | Expands the Applicability for hydrogen recombiners from whenever the reactor is critical to Modes 1 and 2. | 3.3.G.1 | 3.6.8 APP |
| M.2 | Requires that the reactor be in Mode 3 within 6 hours (versus shutdown using normal operating procedures) if the requirements for the hydrogen recombiners are not met within the specified completion time. | 3.3.G.2 | 3.6.8 RA-C.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------------------------------|---|
| ITS SPECIFICATION 3.6.9 - ISOLATION VALVE SEAL WATER (IVSW) SYSTEM | | | |
| M.1 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the requirements for Isolation Valve Seal Water system are not met and associated Actions are not met within specified Completion Times. | 3.3.C.3.a 3.3.C.3.b 3.3.C.3.c | 3.6.9 RA-C.1 3.6.9 RA-C.2 |
| M.2 | Adds requirement for verification every 24 hours that IVSW tank be maintained above the minimum required pressure of 52 psig and above the minimum required volume of 144 gallons of water. | 3.3.C.1.b | 3.6.9.1 SR 3.6.9.3 SR |
| M.3 | Adds requirements for verification that IVSW nitrogen bank pressure is above a specified minimum required every 24 hours, valve actuation time is within required limits every 24 months, and that each automatic valve in the IVSW System actuates to the correct position on an actual or simulated actuation signal every 24 months. | 3.3.C | 3.6.9.2 SR 3.6.9.4 SR 3.6.9.5 SR |
| M.4 | Requires that the reactor be in Mode 3 within 6 hours and Mode 5 within 36 hours if requirements for IVSW are not met and associated Actions not met within specified Completion Times. | 3.3.C.3.a | 3.6.9 RA-C.1 1.3 |
| ITS SPECIFICATION 3.6.10 – WELD CHANNEL AND PENETRATION PRESSURIZATION SYSTEM (WC&PPS) | | | |
| M.1 | Adds requirement for verification every 31 days that the four WC&PPS zones are pressurized above 47 psig. | 3.3.D.1.a | 3.6.10.1 SR |
| M.2 | Adds requirement for verification every 31 days that uncorrected air consumption for the WC&PPS is less than or equal to 0.2% of the containment volume per day. | 3.3.D.1.b | 3.6.10.2 SR |
| M.3 | Requires that depressurized portions of WC&PPS are isolated within 4 hours and requires periodic verification that isolation is maintained. | 3.3.D.2.a | 3.6.10 RA-A.1 3.6.10 RA-A.2 |
| M.4 | Adds Actions intended to ensure appropriate compensatory measures are promptly taken if WC&PPS pressurization is lost. | 3.3.D.2.b | 3.6.10 RA-B.1 3.6.10 RA-B.2 3.6.10 RA-B.3 |
| M.5 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the requirements for WC&PPS are not met and associated Actions are not met within specified Completion Times. | 3.3.D.3.a 3.3.D.3.b 3.3.D.3.c | 3.6.10 RA-C.1 3.6.10 RA-C.2 |
| M.6 | Requires that the reactor be in Mode 3 within 6 hours and Mode 5 within 36 hours if requirements for WC&PPS are not met and associated Actions not met within specified Completion Times. | 3.3.D.3 | 3.6.10 RA-C.1 3.6.10 RA-C.2 1.3 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.7 - PLANT SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|------------------|--|
| ITS SPECIFICATION 3.7.1 - MAIN STEAM SAFETY VALVES (MSSVs) | | | |
| M.1 | Adds MSSV SR acceptance criteria for lift setpoints; staggering of lift setpoints; setpoint tolerance of (plus or minus) 3% as a condition of Operability; and, setpoint adjustment tolerances of (plus or minus) 1%. | 3.4.A | 3.7.1 LCO T 3.7.1-2 |
| M.2 | Limits allowance that MSSVs are not required during testing to restriction that MSSV testing must be completed prior to entering Mode 2. | 3.4.A | 3.7.1.1 SR |
| M.3 | Adds new requirement for a reduction in reactor power to the heat removal capacity of the remaining Operable MSSVs within 4 hours. | 3.4.A.1 3.4.B | 3.7.1 RA-A.1 3.7.1 RA-B.1 3.7.1 RA-B.2 |
| M.4 | Reduces the Completion Time for the Power Range Neutron Flux Trip Setpoint reduction from 72 hours to 36 hours when more than one MSSVs in one or more SGs is inoperable. | 3.4.A.1 3.4.B | 3.7.1 RA-B.2 |
| M.5 | Reduces the Completion Time to place plant in a condition where MSSVs are not required when requirements are not met to be in Mode 2 in 6 hours and Mode 4 in 12 hours. | 3.4.B | 3.7.1 RA-C.1 3.7.1 RA-C.2 |
| M.6 | Superceded by CTS Amendment 228. | NA | NA |
| ITS SPECIFICATION 3.7.2 - MAIN STEAM ISOLATION VALVES (MSIVs) AND MAIN STEAM CHECK VALVES (MSCVs) | | | |
| M.1 | Allows only one MSIV (versus all 4 MSIVs) to be inoperable for up to 72 hours prior to requiring initiation of a plant shutdown. | 3.4.B | 3.7.2 RA-C.1 |
| M.2 | Requires MSIV testing to be completed before entering Mode 2. | 4.7 | 3.7.2.1 SR 3.7.2.2 SR 3.0.4 SR |
| M.3 | Establishes Technical Specification requirement to perform a visual inspection of the MSCVs in accordance with the requirements of and at the Frequency specified by the IST Program. | 3.4 4.7 | 3.7.2.3 SR |
| M.4 | Reduces the Completion Time to place plant in a condition where MSIVs are not required when requirements are not met to be in Mode 3 in 6 hours and Mode 4 in 12 hours. | 3.4.B | 3.7.2 RA-D.1 3.7.2 RA-G.1 3.7.2 RA-G.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|-------------------------|--|
| ITS SPECIFICATION 3.7.3 – MAIN FEEDWATER ISOLATION | | | |
| M.1 | <p>Adds requirements for Operability, allowable out of service times and testing of redundant main feedwater isolation capability consisting of the following:</p> <p>Four Main Feedwater Regulating Valves (MFRVs) and four Low Flow Main Feedwater Bypass Valves (Lo Flow MFBVs); and</p> <p>Two Main Boiler Feedwater Pump (MBFP) discharge valves, and the trip function for each MBFP.</p> | 3.5.1 T 3.5-4, No.3a | 3.7.3.1 SR 3.7.3.2 SR 3.7.3.3 SR |
| ITS SPECIFICATION 3.7.4 - ATMOSPHERIC DUMP VALVES (ADV) | | | |
| M.1 | Adds requirement for Operability of the 4 ADV lines in Modes 1, 2, and 3; and in Mode 4, when a steam generator is being relied upon for heat removal. | 3.4 | 3.7.4 LCO |
| ITS SPECIFICATION 3.7.5 - AUXILIARY FEEDWATER (AFW) SYSTEM | | | |
| M.1 | Expands Applicability for AFW to specify that one of the motor driven AFW pumps must be Operable in Mode 4 when a steam generator is relied upon for heat removal. Additionally, the Note to LCO 3.7.5 specifies that the motor driven AFW pump required to be Operable in Mode 4 must be capable of supporting the SG being credited as the redundant decay heat removal path. | 3.4.A.2 | 3.7.5 LCO 3.7.5 RA-E.1 |
| M.2 | Adds new requirement that an inoperable AFW pump must be restored within 10 days from discovery of failure to meet the LCO if that is more restrictive than the allowable out of service time for the AFW pump. | 3.4.B.1.a | 3.7.5 RA-A.1 3.7.5 RA-B.1 |
| M.3 | Adds an explicit limit that the shutdown to Mode 3 must be completed in 6 hours if an inoperable AFW pump cannot be restored within 72 hours or two AFW pumps are inoperable. | 3.4.B.1.a 3.4.B.1.b | 3.7.5 RA-C.1 3.7.5 RA-C.2 |
| M.4 | Adds requirement for monthly verification of the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths in order to provide assurance that the proper flow paths will exist for AFW operation. | 4.8 | 3.7.5.1 SR |
| M.5 | Increases required Frequency for testing each auxiliary feedwater pump from once every 24 months to the Frequency required by the IP2 Inservice Testing Program Schedule which is currently quarterly. | 4.8.A.2 | 3.7.5.2 SR |
| ITS SPECIFICATION 3.7.6 - CONDENSATE STORAGE TANK (CST) | | | |
| M.1 | Expands Applicability for CST Operability to include Mode 4 when a steam generator is relied upon for heat removal. | 3.4.A 3.4.B | 3.7.6 APP 3.7.6 RA-B.2 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--|--|
| M.2 | Adds requirement that prohibits concurrent inoperability of the CST and city water. | 3.4.A.3 3.4.B 3.4.C | 3.7.6 RA-A.1 |
| M.3 | Adds requirement for periodic verification that CST contains greater than 360,000 gallons of condensate. | 3.4.A.3 | 3.7.6.1 SR |
| M.4 | Reduces the Completion Time to place plant in a condition where CST is not required when requirements are not met to be in Mode 2 in 6 hours and Mode 4 without reliance on SG for heat removal within 18 hours. | 3.4.B | 3.7.6 RA-B.1 3.7.6 RA-B.2 |
| ITS SPECIFICATION 3.7.7 – COMPONENT COOLING WATER (CCW) SYSTEM | | | |
| M.1 | Expands applicability for CCW from whenever the reactor is critical to Modes 1, 2, 3 and 4 (i.e., above cold shutdown). | 3.3.E.1 3.3.E.2 | 3.7.7 APP |
| M.2 | Applies the most restrictive of the CTS Completion Times for plant shutdown to Mode 5 when there is a loss of required redundancy but not a loss of CCW function. | 3.3.E.2 | 3.7.7 RA-B.1 3.7.7 RA-B.2 |
| M.3 | Adds requirements for periodic verification of the key aspects to CCW Operability: ITS SR 3.7.7.1 is a requirement for valve lineups every 92 days; SR 3.7.7.2 is a requirement to verify proper automatic operation of the CCW valves every 24 months; and, SR 3.7.7.3 is a requirement to verify automatic operation of the CCW pumps every 24 months. | 3.3.E | 3.7.7.1 SR 3.7.7.2 SR 3.7.7.3 SR |
| ITS SPECIFICATION 3.7.8 - SERVICE WATER (SW) SYSTEM | | | |
| M.1 | Expands the applicability for essential and non essential service water to include Mode 4 to support required Operability of the emergency diesel generators, containment cooling fan cooler units and component cooling water which ITS requires to be Operable in Mode 4. | 3.3.F.1.a 3.3.F.1.b 3.3.F.2.a 3.3.F.2.b | 3.7.8 APP 3.7.8 RA-E.2 |
| M.2 | Prevents use of the allowance used to swap the essential and non-essential SWS headers if LCO 3.7.8 will not be met after the essential and non-essential header are swapped. | 3.3.F.3 | 3.7.8 RA-Note |
| M.3 | Adds requirement for verification of the correct alignment for manual, power operated, and automatic valves in the SWS System flow paths every 92 days. | 3.3.F | 3.7.8.1 SR |
| M.4 | Adds explicit requirement for verification every 24 months that each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. | 3.3.F | 3.7.8.2 SR |
| M.5 | Adds requirement to verify every 24 months that each SWS pump starts automatically on an actual or simulated actuation signal. | 3.3.F | 3.7.8.3 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|---------------------------------|--|
| M.6 | Clarifies that the 12 hour allowable out of service time in CTS 3.3.F.1.b applies if there is a loss of redundancy (but not a loss of minimum required function) for automatic initiation of SW to all FCUs or all DGs. | 3.3.F.1 3.3.F.2 | 3.7.8 RA-C.1 3.7.8 RA-D.1 3.7.8 RA-E.1 3.7.8 RA-E.2 |
| ITS SPECIFICATION 3.7.9 – ULTIMATE HEAT SINK (UHS) | | | |
| M.1 | Expands the applicability for limits on service water inlet temperature (i.e., ultimate heat sink) to include Mode 4 to support required Operability of the emergency diesel generators, containment cooling fan cooler units and component cooling water which ITS also requires to be Operable in Mode 4. | 3.3.F.4.b | 3.7.9 APP 3.7.9 RA-B.1 3.7.9 RA-B.2 |
| M.2 | Adds a new requirement to verify that the UHS temperature is within required limits every 24 hours whenever the plant is in the applicable modes. | 3.3.F.5 | 3.7.9.1 SR |
| ITS SPECIFICATION 3.7.10 - CONTROL ROOM VENTILATION SYSTEM (CRVS) | | | |
| M.1 | Establishes requirement that two CRVS trains are Operable to provide redundant CRVS capability and ITS LCO 3.7.10, Condition A and Required Action A.1, establish a new AOT of 7 days when one of the two redundant CRVS trains is not Operable. | 3.3.H.1 3.3.H.2 4.5.E.4.c | 3.7.10 RA-A.1 3.7.10 RA-B.1 3.7.10.4 SR |
| M.2 | Reduces the allowable out of service time for loss of CRVS safety function from 3.5 days to 72 hours. | 3.3.H.1 3.3.H.2 | 3.7.10 RA-A.1 |
| M.3 | Eliminates an allowance permitting the reactor to remain in hot shutdown condition (Mode 3) for 48 hours prior to initiating plant cooldown (to Mode 5) when the control room ventilation system is not restored to an operable status within the time period specified. | 3.3.H.2 | 3.7.10 RA-C.1 3.7.10 RA-C.2 |
| M.4 | Not Used. | NA | NA |
| M.5 | Adds requirement that Control Room Ventilation System (CRVS) is Operable "During movement of recently irradiated fuel assemblies" outside containment (i.e., the fuel storage building) if the fuel involved has occupied part of a critical reactor core within the previous 100 hours. | 3.3.H.1 | 3.7.10 LCO |
| M.6 | Adds Required Actions to immediately place the CRVS in the pressurization mode or immediately suspend movement of recently irradiated fuel if one CRVS train is inoperable during movement of recently irradiated fuel assemblies or immediately suspend movement of recently irradiated fuel if both CRVS trains are inoperable during movement of recently irradiated fuel assemblies. | 3.3.H.1 | 3.7.10 RA-D.1 3.7.10 RA-D.2 3.7.10 RA-E.1 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|------------------|--|
| ITS SPECIFICATION 3.7.11 – SPENT FUEL PIT WATER LEVEL | | | |
| M.1 | Adds requirement for verification every 7 days that the spent fuel pit water level is greater than or equal to 23 ft above the top of the irradiated fuel assemblies seated in the storage racks whenever irradiated fuel in the spent fuel pit is being moved. | 3.8.C.2 | 3.7.11.1 SR |
| ITS SPECIFICATION 3.7.12 - SPENT FUEL PIT BORON CONCENTRATION | | | |
| M.1 | CTS requires verification of spent fuel pit boron concentration every 7 days with an allowance to extend the interval to 10 days. ITS maintains the requirement to verify spent fuel pit boron concentration every 7 days; however, ITS SR 3.0.2 limits any extension to the 7 day SR interval to 25% (i.e., 8.25 days). | T 4.1-2, No.8 | 3.0.2 SR 3.7.12.1 SR |
| ITS SPECIFICATION 3.7.13 - SPENT FUEL PIT STORAGE | | | |
| | NONE | | |
| ITS SPECIFICATION 3.7.14 - SECONDARY SPECIFIC ACTIVITY | | | |
| M.1 | Expands the applicability for limits on secondary system specific activity to include Mode 4 because SG venting to the atmosphere may be needed to remove decay heat in Mode 4. | 3.4.A 3.4.A.6 | 3.7.14 APP 3.7.14 RA-A.1 3.7.14 RA-A.2 |
| M.2 | Changes limits for steam generator secondary side activity level from "total iodine activity of I-131 and I-133" to Dose Equivalent I-131 which is defined in NUREG-1431 as "that concentration of I-131 (micro curies/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present." | 3.4.A.6 | 3.7.14 |
| M.3 | Eliminates 72 hour allowance to restore secondary specific activity within required limits and requires that plant shutdown to Mode 3 is completed within 6 hours (versus 12 hours allowed in the CTS) when limits for secondary specific activity are not met. | 3.4.B | 3.7.14 LCO 3.7.14 RA-A.1 3.7.14 RA-A.2 |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|--|
| ITS SPECIFICATION 3.8.1 - AC SOURCES - OPERATING | | | |
| M.1 | Expands Applicability for Onsite and Offsite AC sources from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for Onsite and Offsite AC sources are not met. | 3.7.A | 3.8.1 RA-F.1 3.8.1 RA-F.2 3.8.1 RA-G.1 3.8.1 RA-H.1 |
| M.2 | Adds Note requiring that Conditions and Required Actions for LCO 3.8.9, "Distribution Systems - Operating," must be immediately entered whenever no "offsite or DG" AC power source is automatically available to any train. | 3.7.A.4 | 3.8.1 RA-D.1 3.8.1 RA-D.2 |
| M.3 | Adds requirement for periodic verification of correct breaker alignment and indicated power availability for offsite circuits. Adds requirement to increase the Frequency of the verification of correct breaker alignment and indicated power availability for offsite circuits whenever the number of AC onsite sources or the number of offsite AC sources is one less than required. | 3.7 4.6 | 3.8.1 RA-A.1 3.8.1 RA-B.1 3.8.1.1 SR |
| M.4 | Adds requirement that required features with no offsite power automatically available must be declared inoperable within 24 hours when its redundant required feature is inoperable. | 3.7.B.3 | 3.8.1 RA-A.3 |
| M.5 | Not Used. | NA | NA |
| M.6 | Adds acceptance criteria to DG start test (i.e., DG starts from standby conditions and achieves, in less than or equal to 10 seconds, voltage greater than or equal to 426 V and less than or equal to 500 V, and frequency greater than or equal to 58.8 Hz and less than or equal to 61.2 Hz). | 4.6.A.1 | 3.8.1.2 SR 3.8.1.3 SR |
| M.7 | Adds acceptance criteria to DG load test (i.e., DG start test is immediately followed by one hour of operation at 90% to 100% of the continuous rating). | 4.6.A.1 | 3.8.1.2 SR 3.8.1.3 SR |
| M.8 | Adds requirement for verification that DG fuel inventory in the day tanks is greater than or equal to 115 gallons at a Frequency of once per 24 hours. | 4.6 | 3.8.1.4 SR |
| M.9 | Adds requirement to check for and remove accumulated water from each day tank once every 31 days. | 4.6 | 3.8.1.5 SR |
| M.10 | Adds new requirement to verify every 92 days that the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to each DG day tank. | 4.6 | 3.8.1.6 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|----------------|------------------------------|
| M.11 | Adds new requirement to verify every 24 months that offsite power can be manually transferred from the 138 kV offsite (normal) source to the 13.8 kV offsite (alternate) source to demonstrate the Operability of the 13.8 kV offsite source to power the shutdown loads as is assumed in the UFSAR. | 4.6 | 3.8.1.7 SR |
| M.12 | Adds explicit requirement that 6.9 kV buses 2 and 3 will auto transfer to 6.9 kV buses 5 and 6 following a loss of voltage on 6.9 kV buses 2 and 3 and adds new requirement to test this feature every 24 months. | 3.7 4.6 | 3.8.1 LCO Note 3.8.1.8 SR |
| M.13 | Adds new requirement to verify every 24 months that a loss of voltage signal on the emergency bus concurrent with an ESF actuation signal causes each DG's automatic trips to be bypassed except for those trips identified in the UFSAR as not being bypassed. The trips not bypassed are engine overspeed, low lube oil pressure, and the start failure relay (i.e., engine over crank). | 4.6 | 3.8.1.9 SR |
| M.14 | Adds more restrictive acceptance criteria to the DG endurance test run including that: this endurance run continue for at least 8 hours; the run is conducted with the DG loaded between 105% and 110% of the continuous rating for greater than or equal 2 hours and between 90% and 100% of the continuous rating for the remaining hours of the test; and test must be conducted with a power factor less than or equal to 0.85 lagging. | 4.6.A.2 | 3.8.1.10 SR |
| M.15 | Adds new requirement to verify every 24 months that individual load timers function to auto-connected emergency loads are re-connected to the emergency bus within the time interval assumed in the safety analysis. | 3.7 4.6.A.3 | 3.8.1.11 SR |
| M.16 | Adds more comprehensive acceptance criteria for the test of the DGs comparability to response to a loss of offsite power concurrent with a loss of coolant accident. Specifically, ITS SR 3.8.1.12 requires that each DG starts from standby conditions and achieves, in less than or equal to 10 seconds, voltage greater than or equal to 428 V and less than or equal to 500 V, and frequency greater than or equal to 58.8 Hz and less than or equal to 61.2 Hz. | 4.6.A.3 | 3.8.1.12 SR |
| ITS SPECIFICATION 3.8.2 - AC SOURCES – SHUTDOWN | | | |
| M.1 | Adds requirements for minimum requirements for AC sources when the reactor is in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies. Added Required Actions if these requirements for minimum AC Sources are not met and periodic testing necessary to demonstrate that the AC sources are capable of responding as required. | 3.7 | 3.8.2 LCO |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|---------------|------------------------------------|
| ITS SPECIFICATION 3.8.3 - DIESEL FUEL OIL AND STARTING AIR | | | |
| M.1 | Establishes requirement that properties of diesel fuel oil in the DG fuel oil storage tanks and the DG fuel oil reserve are verified to the acceptance criteria and at the frequency specified in ITS 5.5.11, "Diesel Fuel Oil Testing Program." | 3.7 4.6 | 3.8.3.3 SR 3.8.3.4 SR 5.5.11 |
| M.2 | Increases Frequency for verification of the DG fuel inventory in the DG offsite reserve from weekly to every 24 hours with the maximum time between verifications governed by ITS SR 3.0.2. | T 4.1-3, No.7 | 3.8.3.1 SR |
| M.3 | Establishes requirement for periodic verification that each DG air receiver is at the minimum pressure required to support at least four start attempts consistent with the requirements in the UFSAR Section 8.2. | 3.7 4.6 | 3.8.3.5 SR |
| M.4 | Establishes requirement for periodic checking for and removing accumulated water from each DG fuel oil storage tank. | 3.7 4.6 | 3.8.3.6 SR |
| ITS SPECIFICATION 3.8.4 - DC SOURCES – OPERATING | | | |
| M.1 | Expands Applicability for DC sources (i.e., batteries and battery chargers) from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for batteries and/or chargers are not met. | 3.7.A | 3.8.4 RA-C.1 3.8.4 RA-C.2 |
| M.2 | Adds surveillance that verifies that the alternate source of DC control power will be connected immediately if the required battery and/or charger does not maintain the associated DC power panel above the required minimum voltage needed to support DC control power. Operability of this feature is needed only to justify a 24 hour Completion Time for restoration of an inoperable battery and/or charger. | 4.6 | 3.8.4.4 SR |
| M.3 | Supplements requirement for periodic verification of battery voltage with requirement that battery voltage meet acceptance criteria in accordance with the program established by Technical Specification 5.5.15, "Battery Monitoring and Maintenance Program." | 4.6.B.1 | 3.8.4.1 SR 5.5.15 |
| M.4 | Adds requirement for periodic verification every 24 months that: each battery each battery charger supplies greater than or equal to 250 amps at greater than or equal to the minimum established float voltage for greater than 2 hours; or, each battery charger can recharge the battery to the fully charged state within 15 hours while supplying the normal steady state loads, after a battery discharge to the bounding design basis event discharge state. | 3.7 4.6 | 3.8.4.2 SR |
| M.5 | Increases the Frequency for battery voltage verification from monthly to every 7 days consistent with the recommendations in IEEE-450-1995. | 4.6.B.1 | 3.8.4.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|------------------|--|
| M.6 | Adds explicit statement that the battery load test may not be performed in Modes 1 and 2 although portions of the Surveillance may be performed to reestablish Operability provided an assessment determines the safety of the plant is maintained or enhanced. | 4.6.C.4 | 3.8.4.3 SR 3.8.4.6 SR |
| ITS SPECIFICATION 3.8.5 - DC SOURCES - SHUTDOWN | | | |
| M.1 | Adds requirements for Operability and Surveillance testing of any DC electrical power subsystem (i.e., battery and charger) needed to support the DC electrical power distribution subsystems required by LCO 3.8.10, "Distribution Systems—Shutdown" when in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies. | 3.7 4.6 | 3.8.5 LCO 3.8.5.1 SR 3.8.10 |
| ITS SPECIFICATION 3.8.6 - BATTERY PARAMETERS | | | |
| M.1 | Expands Applicability for station battery Operability from whenever the reactor is critical to whenever associated DC electrical power subsystems are required to be Operable in ITS LCO 3.8.4 and ITS LCO 3.8.5. | 3.7.A 3.7.A.6 | 3.8.4 3.8.5 3.8.6 3.8.10 |
| M.2 | Adds acceptance criteria for use with the requirement for verification that each battery pilot cell temperature and battery cell voltage is measured and recorded. | 4.6.C.1 | 3.8.6.2 SR 3.8.6.4 SR |
| M.3 | Adds requirement for monthly verification that each battery cell level is within design limits. | 4.6.C.1 | 3.8.6.3 SR |
| M.4 | Adds requirements to verify every 60 months that the battery capacity is greater than or equal to 80% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test every 60 months. SR 3.8.6.6 requires that the Frequency for this test is accelerated to 12 months when battery shows degradation or has reached 85% of expected life with capacity less than 100% of manufacturer's rating and accelerated to 24 months when battery has reached 85% of the expected life with capacity less than or equal to 100% of manufacturer's rating. | 4.6.C.4 | 3.8.6.5 SR 3.8.6.6 SR 3.8.4.3 SR |
| M.5 | Adds requirement to verify every 7 days that the battery is fully charged by verifying battery float current while on float charge is within specified limits. | 3.7.A 4.6.C | 3.8.6.1 SR |
| ITS SPECIFICATION 3.8.7 - INVERTERS - OPERATING | | | |
| M.1 | Establishes explicit requirements for Operability of the inverters supplying each of the four 118 V AC instrument buses in Modes 1, 2, 3 and 4. Establishes new requirements for periodic verification that the inverters are functioning properly (i.e., voltage and frequency with acceptable limits) with all required circuit breakers closed and AC buses energized from the inverter. Establishes a limit that allows only one inverter to be inoperable at one time and limits the time that this inverter may be inoperable to 24 hours. | 3.7 | 3.8.7 RA-A.1 3.8.7 RA-B.1 3.8.7 RA-B.2 3.8.7.1 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|---|--------------------|--|
| ITS SPECIFICATION 3.8.8 - INVERTERS – SHUTDOWN | | | |
| M.1 | Adds explicit requirements for Operability of the inverters supplying 118 V AC instrument buses required by LCO 3.8.10, "Distribution Systems - Shutdown" when in Mode 5 or 6 or during the movement of recently irradiated fuel assemblies. Establishes new requirements for periodic verification that the inverters are functioning properly (i.e., voltage and frequency with acceptable limits) with all required circuit breakers closed and AC buses energized from the inverter | 3.7 | 3.8.8 RA-A.1 3.8.8 RA-A.2 3.8.8.1 SR |
| ITS SPECIFICATION 3.8.9 - DISTRIBUTION SYSTEMS - OPERATING | | | |
| M.1 | Expands Applicability for AC, DC, and 118 Vac instrument bus electrical power distribution subsystems from whenever the reactor is critical to Modes 1, 2, 3 and 4. Requires that the reactor is placed in Mode 5 if requirements for AC, DC, and 118 Vac instrument bus electrical power distribution subsystems are not met. | 3.7.A.4 3.7.A.6 | 3.8.9 RA-D.1 3.8.9 RA-D.2 3.8.9 RA-E.1 |
| M.2 | Expands the list of AC and DC Buses required to be Operable to include all buses that power equipment required by the ITS to be Operable in Modes 1, 2, 3 and 4. ITS Table B 3.8.9-1 includes a detailed list of the specific buses required to be Operable. | 3.7.A.4 | 3.8.9 |
| M.3 | Added Surveillance for periodic verification that required AC, DC, and 118 VAC instrument bus electrical power distribution systems are functioning properly, with the correct circuit breaker alignment. | 3.7 4.6 | 3.8.9.1 SR |
| ITS SPECIFICATION 3.8.10 - DISTRIBUTION SYSTEMS – SHUTDOWN | | | |
| M.1 | Adds requirements for Operability and Surveillance testing of any AC, DC or vital instrument bus electrical power subsystem needed to support equipment required to be Operable in Mode 5 or Mode 6 or during movement of recently irradiated fuel. | 3.7.F 4.6 | 3.8.10 LCO |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 3.9 - REFUELING OPERATIONS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|---|----------------------|---------------------------|
| ITS SPECIFICATION 3.9.1 - BORON CONCENTRATION | | | |
| M.1 | Expands the Applicability from "when fuel is being loaded or unloaded from the reactor" to Mode 6 (i.e., when fuel is in the reactor vessel and the reactor vessel head bolts are less than fully tensioned) for the requirement that the shutdown margin must be greater than or equal to 5% delta k/k; or, boron concentration must be greater than or equal to 2000 ppm. | 3.8.B.2 3.8.B.iii | 3.9.1 APP 3.9.1 RA-A.3 |
| M.2 | Adds explicit statement that requirements for refueling boron concentrations apply to "the Reactor Coolant System, the refueling canal, and the refueling cavity" with the clarification that the limits apply to the refueling canal, and the refueling cavity only when these volumes are connected to the RCS. | 3.8.B.2 | 3.9.1 LCO |
| M.3 | Adds requirement to "Suspend positive reactivity additions" immediately whenever minimum reactor boron concentration are not met. | 3.8.B.3 | 3.9.1 RA-A.2 |
| M.4 | Adds requirement to suspend the movement of any sources or reactivity control components, within the reactor vessel in addition to the requirement to suspend "loading and unloading fuel from the reactor" when the requirement for minimum reactor boron concentration is not met. | 3.8.B.2 | 1.0 3.9.1 |
| ITS SPECIFICATION 3.9.2 - NUCLEAR INSTRUMENTATION | | | |
| M.1 | Adds new restriction against "the movement of neutron source bearing assemblies," other sources, or reactivity control components when requirements for a minimum two Operable source range monitors are not met when in Mode 6. | 3.8.A.2 | 3.9.2 RA-A.1 1.0 |
| M.2 | Adds requirement to immediately "Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1" whenever the requirement for 2 Operable SRMs is not met when in Mode 6. | 3.8.A.2 | 3.9.2 RA-A.2 |
| M.3 | Adds new requirement that audible indication (i.e., audible count rate) is available at all times in Mode 6. Adds requirement for immediate initiation of action to isolate unborated water sources if the required SRM alarm (i.e., audible count rate indication) function is not Operable. | 3.8.A.2 | 3.9.2 LCO 3.9.2 RA-C.1 |
| M.4 | Adds an explicit requirement for periodic calibration of the source range nuclear detectors (including required audible count rate and indication functions) when in Mode 6. | T 4.1-1, No.3 | 3.9.2.2 SR |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|---------------------------|--|
| ITS SPECIFICATION 3.9.3 – CONTAINMENT PENETRATIONS | | | |
| M.1 | Adds requirement that "One door in each air lock is capable of being closed" during movement or recently irradiated fuel. | 3.8.A 3.8.B 3.6.A.1 | 3.9.3.b |
| M.2 | Adds requirement for verification every 7 days that "each required containment penetration is in the required status" (i.e., Operable or closed) during the movement of irradiated fuel in containment. | 3.8.A.1. 3.8.B.8 | 3.9.3.1 SR |
| ITS SPECIFICATION 3.9.4 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - HIGH WATER LEVEL | | | |
| M.1 | Limits the amount of time that the required RHR pump may be removed from operation to less than or equal to 1 hour per 8 hour period and only if no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration. | 3.8.A.6 | 3.9.4 LCO |
| M.2 | Adds requirements to ensure that all containment penetrations are either closed or can be closed if requirements for redundant decay heat removal capability and forced flow in the reactor coolant system are not met. | 3.8.A.3 3.8.A.5 | 3.9.4 RA-A.1 3.9.4 RA-A.3 3.9.4 RA-A.4 3.9.4 RA-A.5 3.9.4 RA-A.6.1 3.9.4 RA-A.6.2 |
| M.3 | Adds requirement for verification every 12 hours that the required RHR loop is in operation and circulating reactor coolant at a flow rate greater than or equal to the rate needed to prevent boron stratification and provide adequate heat removal. | 3.8.A.3 | 3.9.4.1 SR |
| ITS SPECIFICATION 3.9.5 - RESIDUAL HEAT REMOVAL (RHR) AND COOLANT CIRCULATION - LOW WATER LEVEL | | | |
| M.1 | Limits the amount of time that the required RHR pump may be removed from operation when in Mode 6 with water level less than 23 feet above the RPV flange to less than or equal to 15 minutes and only when switching from one RHR loop to the other and only if the following restrictions are met: a. The core outlet temperature is maintained greater than 10 degrees F subcooled (i.e., below saturation temperature); b. No operations are permitted that would cause a reduction of the Reactor Coolant System boron concentration; and c. No draining operations to further reduce RCS water volume are permitted. | 3.8.A.6 | 3.9.5 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|--------------------|--|
| M.2 | Adds requirements to ensure that all containment penetrations are either closed or can be closed if requirements for decay heat removal capability and forced flow in the reactor coolant system are not met. | 3.8.A.3 3.8.A.5 | 3.9.5 RA-B.1 3.9.5 RA-B.2 3.9.5 RA-B.3 3.9.5 RA-B.4 3.9.5 RA-B.5.1 3.9.5 RA-B.5.2 |
| M.3 | Adds requirement for verification every 12 hours that the required RHR loop is in operation and circulating reactor coolant at a flow rate greater than or equal to the rate needed to prevent boron stratification and provide adequate heat removal. | 3.8.A.4 | 3.9.5.1 SR |
| M.4 | Adds requirement for verification every 7 days of the correct breaker alignment and that power is available to the Operable pump that is not in operation. | 3.8.A.4 | 3.9.5.2 SR |
| ITS SPECIFICATION 3.9.6 - REFUELING CAVITY WATER LEVEL | | | |
| M.1 | Adds a requirement to verify every 24 hours that the water level is at least 23 feet above the top of the reactor pressure vessel flange whenever movement of irradiated fuel is taking place inside the containment. | 3.8.B.11 | 3.9.6.1 SR |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 4.0 - DESIGN FEATURES

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|----------------------|--|-------------|-------------|
| M.1 | Adds an explicit requirement that the spent fuel storage pit shall be maintained to prevent inadvertent draining of the pool below a nominal elevation of approximately 89 feet which is an existing design feature of the fuel storage pit. | None | 4.3.2 |
| M.2 | Adds an explicit requirement that the spent fuel pit is designed and shall be maintained with a storage capacity limited to no more than 269 fuel assemblies in Region I and 1105 fuel assemblies in Region II, which is an existing design feature of the fuel storage pit. | None | 4.3.3 |
| M.3 | Includes in Technical Specifications that "a sufficient center-to-center distance" is revised to indicate that the center to center spacing of the new fuel rack must be at least 20.5 inches. | 5.4.2.A | 4.3.1.2.c |

TABLE M - MORE RESTRICTIVE CHANGES TO THE CTS

ITS SECTION 5.0 - ADMINISTRATIVE CONTROLS

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|--------------|
| ITS SPECIFICATION 5.1 - RESPONSIBILITY | | | |
| M.1 | Adds explicit requirement that the plant manager or his designee must approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety. | None | 5.1.1 |
| M.2 | Adds specific requirement that the shift supervisor (SS) is responsible for the control room command function. | 6.1.2 | 5.1.2 |
| ITS SPECIFICATION 5.2 - ORGANIZATION | | | |
| M.1 | Adds new prohibitions against routine deviations from overtime restrictions and adds requirement for a periodic independent review be conducted to ensure that excessive hours have not be assigned. | 6.2.2.g | 5.2.2.e |
| ITS SPECIFICATION 5.3 – UNIT STAFF QUALIFICATIONS | | | |
| | NONE | | |
| ITS SPECIFICATION 5.4 - PROCEDURES | | | |
| M.1 | Adds explicit requirement to have written procedures for all of the programs listed in ITS Section 5.5. | 6.8.1 | 5.4.1 5.5 |
| M.2 | Adds explicit requirement to have written procedures for emergency operating procedures required to implement the requirements of NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. | 6.8.1 | 5.4.1.b |
| ITS SPECIFICATION 5.5 - PROGRAMS AND MANUALS | | | |
| ITS SPECIFICATION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL (ODCM) | | | |
| M.1 | Adds definition and specific requirements about what is required to be in the Offsite Does Calculation Manual (ODCM). | 6.15.1 | 5.5.1.a |
| M.2 | Adds requirement that changes to the ODCM requiring plant manager approval (with the recommendation of the Station Nuclear Safety Committee (SNSC)) and not just SNSC approval. | 6.15.2 | 5.5.1.b |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|---|--|-------------|-------------|
| M.3 | Establishes more explicit criteria for a determination that changes to the ODCM will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations. | 6.15.2.1.b | 5.5.1.a.2 |
| ITS SPECIFICATION 5.5.2 - PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.3 - RADIOACTIVE EFFLUENT CONTROLS PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.4 - COMPONENT CYCLIC OR TRANSIENT LIMIT | | | |
| M.1 | Adds requirement to develop and maintain a program that tracks cyclic and transient occurrences to ensure that components are maintained within the design limits. This program is currently required by UFSAR, Section 4.1.5, Cyclic Loads. | None | 5.5.4 |
| ITS SPECIFICATION 5.5.5 – REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.6 - INSERVICE TESTING PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.7 - STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.8 - SECONDARY WATER CHEMISTRY PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.9 - VENTILATION FILTER TESTING PROGRAM (VFTP) | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.10 - EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.11 - DIESEL FUEL OIL TESTING PROGRAM | | | |
| M.1 | Adds new requirement that a diesel fuel oil testing program is maintained with specific Technical Specification requirements for acceptance criteria and testing frequency. | 4.6 | 5.5.11 |
| ITS SPECIFICATION 5.5.12 – TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | | | |
| M.1 | Adds requirement to develop and maintain a Technical Specification Bases Control Program. | None | 5.5.12 |

| Discussion of Change | Summary of Change | CTS Section | ITS Section |
|--|--|---------------------------|----------------|
| ITS SPECIFICATION 5.5.13 - SAFETY FUNCTION DETERMINATION PROGRAM (SFDP) | | | |
| M.1 | Adds requirement to develop and maintain a Safety Function Determination Program. | None | 5.5.13 |
| ITS SPECIFICATION 5.5.14 - CONTAINMENT LEAKAGE RATE TESTING PROGRAM | | | |
| | NONE | | |
| ITS SPECIFICATION 5.5.15 - BATTERY MONITORING AND MAINTENANCE PROGRAM | | | |
| M.1 | Adds requirement to develop and maintain a Battery Monitoring and Maintenance Program. | None | 5.5.15 |
| ITS SPECIFICATION 5.6 - REPORTING REQUIREMENTS | | | |
| M.1 | Adds requirement to submit a report to the NRC whenever any instrument required by ITS 3.3.3 (i.e., any RG 1.97, Type A instruments, and any RG 1.97, Category I, non-Type A instruments) is inoperable and not restored within the required allowable out of service time. The report is required to outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to Operable status. | 6.9.2.h 3.5 T 3.5-5 | 5.6.6 3.3.3 |
| M.2 | Not Used. | NA | NA |

TABLE R – RELOCATED ITEMS

| Discussion of Change | Summary of Change | CTS Section | New Location | Change Control Process |
|-----------------------------|---|--|---------------------|-------------------------------|
| R.1 | Relocates CTS 3.1.E, RCS Maximum Reactor Coolant Oxygen, Chloride and Fluoride Concentration, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.A) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.1.E T 4.1-2, No. 1 | TRM 3.4.A | 10 CFR 50.59 |
| R.2 | Relocates CTS 3.2, Chemical and Volume Control System, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.1.B) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.2 T 4.1-1, No.12 T 4.1-1, No.14 T 4.1-1, No.17 T 4.1-1, No.20 T 4.1-2, No.4 | TRM 3.1.B | 10 CFR 50.59 |
| R.3 | Relocates CTS 3.11, Movable Incore Instrumentation, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.11.A | UFSAR | 10 CFR 50.59 |
| R.4 | Relocates CTS 3.12, Shock Suppressors (Snubbers) and the associated surveillance requirements in CTS 4.12 to a licensee document controlled by 10 CFR 50.59 (i.e., the TRM 3.7.A) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.12 4.12 | TRM 3.7.A | 10 CFR 50.59 |
| R.5 | Relocates CTS 3.14 and CTS 4.17, Hurricane Alert, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 5.4) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.14 4.17 | TRM 5.4 | 10 CFR 50.59 |
| R.6 | Relocates CTS 3.15, Meteorological Monitoring System, and associated surveillance requirements in CTS 4.19 to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.A) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.15 4.19 | TRM 3.3.A | 10 CFR 50.59 |

| Discussion of Change | Summary of Change | CTS Section | New Location | Change Control Process |
|----------------------|--|----------------|--------------|------------------------|
| R.7 | Relocates CTS 3.16, Reactor Coolant System Vents, and the associated surveillance requirements in CTS 4.20 to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.B) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.16 4.20.A | TRM 3.4.B | 10 CFR 50.59 |
| R.8 | Relocates CTS 3.1.B.5, Pressurizer Heatup and Cooldown Limits, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.C) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.1.B.5 | TRM 3.4.C | 10 CFR 50.59 |
| R.9 | Relocates CTS 3.1.B.4, SG Secondary Side Minimum Temperature for Pressurization, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.1.B.4 | UFSAR | 10 CFR 50.59 |
| R.10 | Relocates CTS 4.3, Reactor Coolant System Integrity Testing, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 4.3.a 4.3.b | UFSAR | 10 CFR 50.59 |

| Discussion of Change | Summary of Change | CTS Section | New Location | Change Control Process |
|----------------------|--|---|------------------------|------------------------|
| R.11 | <p>Relocates the following to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.4.D):</p> <p>CTS 3.1.F.1.a.(1), two containment sump pumps; CTS 3.1.F.1.a.(2), two containment sump level monitors; CTS 3.1.F.1.a.(4), recirculation sump level monitors; CTS 3.1.F.1.a.(5), reactor cavity level monitors; CTS 3.1.F.1.b, reactor cavity level monitors; CTS 3.1.F.1.b.(4), recirculation sump level monitor allowable out of service time; CTS 3.1.F.1.b.(5), reactor cavity level monitor allowable out of service time; CTS 3.1.F.1.c, required actions for inoperable sump pumps and level monitors; CTS 3.1.F.2.d, Leakage into the Containment Free Volume; CTS 4.16.A.3, periodic reactor cavity and recirculation sump monitoring; CTS 4.16.C, containment sump pump surveillances.</p> <p>These requirements are relocated because the requirements associated with the monitoring and mitigation of containment flooding do not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications.</p> | 3.1.F.1.a.(1) 3.1.F.1.a.(2) 3.1.F.1.a.(4) 3.1.F.1.a.(5) 3.1.F.1.b 3.1.F.1.b.(4) 3.1.F.1.b.(5) 3.1.F.1.c 3.1.F.2.d 4.16.A.3 4.16.C | TRM 3.4.D | 10 CFR 50.59 |
| R.12 | Superceded. Requirements for Gas Turbines relocated by CTS Amendment 236 dated January 17, 2003. | NA | NA | NA |
| R.13 | Relocates CTS 3.7.C, Electrical Circuits in Containment, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.8.A) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.7.C | TRM 3.8.A | 10 CFR 50.59 |
| R.14 | Relocates CTS 3.8 requirements (i.e., Manipulator Cranes and Heavy Loads in Proximity to Spent Fuel) to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.9.B and 3.9.C) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.8.A.1 3.8.B 3.8.C | TRM 3.9.B TRM 3.9.C | 10 CFR 50.59 |
| R.15 | Relocates CTS 3.3.I, Cable Tunnel Ventilation Fans, and associated testing in CTS Table 4.1-3, No.9, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.7.D) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.3.I T 4.1-3, No.9 | TRM 3.7.D | 10 CFR 50.59 |

| Discussion of Change | Summary of Change | CTS Section | New Location | Change Control Process |
|----------------------|--|---|-------------------------------------|------------------------|
| R.16 | Relocates requirements for City Water to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.7.E) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.4.A.3 3.4.C | TRM 3.7.E | 10 CFR 50.59 |
| R.17 | Relocates CTS 3.3.G, Post Accident Containment Venting System, and the associated testing requirements in CTS 4.5.G, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.7.F) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.3.G 4.5.G | TRM 3.7.F | 10 CFR 50.59 |
| R.18 | Relocates CTS 2.3.3, Control Rod Protection System, to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.1.C) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 2.3.3 T3.5-2, Note**** | TRM 3.1.C | 10 CFR 50.59 |
| R.19 | Relocates CTS Table 4.1-3, No.6, Refueling Interlocks, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | T 4.1-3, No.6 | UFSAR | 10 CFR 50.59 |
| R.20 | Relocates CTS Table 4.1-3, No.8, Turbine Stop Valve /Overspeed Protection Testing, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | T 4.1-3, No.8 | UFSAR | 10 CFR 50.59 |
| R.21 | Relocates CTS 3.8.B.7 and CTS 3.8.B.9 (i.e., requirements for radiation monitoring in the spent fuel storage area when moving spent fuel and radiation monitoring in containment when moving fuel or heavy loads in containment) and CTS Table 4.1-1, No.19, (i.e., periodic monitoring and calibration of area radiation monitors) to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.3.D, 3.3.E and 3.3.E and 3.3.I) because these requirements do not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.8.B 3.8.B.7 3.8.B.9 T 4.1-1, No.19a T 4.1-1, No.19b | TRM 3.3.D TRM 3.3.E TRM 3.3.I | 10 CFR 50.59 |

| Discussion of Change | Summary of Change | CTS Section | New Location | Change Control Process |
|----------------------|--|-------------------|--------------|-------------------------------|
| R.22 | Relocates CTS 4.15, Radioactive Materials Surveillance (i.e., tests for leakage and/or contamination from byproduct, source, and special nuclear material sources) and CTS 6.9.2.c, Reporting Sealed Source Leakage in excess of limits, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 4.15.A 6.9.2.c | UFSAR | 10 CFR 50.59 |
| R.23 | Relocates CTS 3.8.A.7, Reactor Temperature limit requirement to be less than or equal to 140° F when RPV head bolts are less than fully tensioned, to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.8.A.7 | UFSAR | 10 CFR 50.59 |
| R.24 | Relocates CTS 3.8.B.4 (i.e., requirement to delay movement of irradiated fuel for 100 hours after reactor shutdown) to a licensee document controlled by 10 CFR 50.59 (i.e., TRM 3.9.A) because ITS LCO 3.7.10, Control Room Ventilation System, and ITS LCO 3.9.3, Containment Penetrations, establish requirements for systems that mitigate the consequences of a fuel handling accident that occurs with fuel that was irradiated in the previous 100 hours. | 3.8.B.4 | TRM 3.9.A | 10 CFR 50.59 |
| R.25 | Relocates CTS 3.8.B.3 (i.e., direct communication between the control room and the refueling cavity manipulator crane shall be available whenever changes in core geometry are taking place) to a licensee document controlled by 10 CFR 50.59 (i.e., IP2 UFSAR) because this requirement does not meet any of the criteria specified in 10 CFR 50.36(c)(2)(ii) for inclusion in Technical Specifications. | 3.8.B.3 | UFSAR | 10 CFR 50.59 |
| R.26 | Relocates CTS 3.8.B.10 (i.e., requirement that a person holding a senior operator license or a senior operator license limited to fuel handling shall be present to directly supervise the activity during alteration of the core (including fuel loading or transfer) because it duplicates a 10 CFR 50.54 (3)(m)(2)(iv) requirement. | 3.8.B.10 | Procedure | 10 CFR 50.54 (3)(m)(2)(iv) |
| R.27 | Superceded by IP2 Amendment 229. Fuel Storage Building Ventilation System was relocated out of the CTS by CTS Amendment 229, dated June 5, 2002 (TAC MB3920). | NA | NA | NA |
| R.28 | This Relocated Item is deleted. IP2 will retain Containment Penetrations during Refueling Operations as ITS LCO 3.9.3. | NA | NA | NA |