

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY		CTS	PTS
A1	The below listed CTS requirements are revised by non-technical, non-intent changes for wording preference, convention adoption, editorial correction, and reformatting. Brackets “[. . .]” denote the revised number for requirements which are being renumbered or moved to another specification. Note that this list does not include all specifications being changed in this license amendment.		See below	See below
<u>Specification</u>	<u>Specification</u>	<u>Specification</u>	<u>Specification</u>	
FOL 1.E	Tbl 3.3-4, Item 1.c		6.9.1.5.a, b - [6.6.1, 6.6.7]	
FOL 1.I	Tbl 3.3-4 FU 2.a, 3.a	Tbl 4.7.8-1, Notes 1, 2, 3, 4, and 5	6.9.1.5.e - [6.6.8]	
FOL 2	Tbl 3.3-4 FU 5.a	3/4.8.1.1 - [3/4.8.1.1]	6.9.1.6 - [6.6.4]	
FOL 2.A	Tbl 3.3-4 FU 8.c, 8.d	3/4.8.1.1 - [3/4.8.1.3]	6.9.3 - [6.6.3]	
FOL 2.C(3)(e)	Tbl 3.3-6, Item 2.c	3/4.8.1.1 - [6.5.13]	6.9.4 - [6.6.2]	
FOL 2.C(3)(p) - [6.5.10]	Tbl 3.3-6 Action 16.c	3/4.8.1.1 Action c.4	6.9.5 - [6.6.5]	
FOL 2.C(5) - [6.5.2]	Tbl 3.3-6, Item 2.b Action 20	3/4.9.1	6.10	
FOL 2.C(6) - [6.5.3]	Tbl 4.3-6, Item 5	4.9.11.2 - [6.5.11]	6.12	
FOL 2 (D) - [FOL 2.D]	Tbl 3.3-10	3.10.2	6.13 - [6.7]	
FOL 3.15, page 6	4.4.5.0 - 4.4.5.4 - [4.4.5] & [6.5.9]	6.1.2	6.14 - [6.5.1]	
INDEX	4.4.5.5 - [6.6.7]	6.2.1.a, b, c, and d	6.15 - [6.5.16]	
1.14a, 1.15, 1.18	Tbl 4.4-1 - [Tbl 6.5.9-1]	6.2.2.f, g, h - [6.2.2.g, e, f]		
1.19, 1.33	Tbl 4.4-2 - [Tbl 6.5.9-2]	Tbl 6.2-1 Note # - [6.2.2.c]		
3/4.1.1.3	Pages 3/4 6-11 & -16	6.3, 6.4, 6.5, & 6.6		
3/4.2.2 Action b	4.6.3.1.4 - [4.6.3.1.4] & [6.5.16]	6.8.4.b - [6.5.5]		
Tbl 3.3-1 Action 2	3/4.6.2.1	6.8.a - [6.4.1.a]		
Tbl 3.3-3 Action 10	3/4.6.3.1 - [3/4.6.3.1] & [6.5.16]	6.8.e, f, g - [6.4.1.c, e]		
3/4.3.3.1	3/4.7.6.1 - [3/4.7.6.1] & [6.5.11]	6.8.4.a - [6.5.4]		

(Note: FOL = Facility Operating License; Tbl = Table; FU = Functional Unit)

ATTACHMENT

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A2	A statement regarding the Applicability of SR 4.0.2 and/or SR 4.0.3 is added for clarification that the allowances provided by these general Surveillance Requirements are applicable to the identified program. This is an administrative change since the CTS 4.0.2 and 4.0.3 are currently applicable to the requirements being moved to the program that will be identified in the Administrative Controls Section 6.5.	4.7.6.1.2 4.8.1.1.2.b 4.9.11.2	6.5.13 6.5.11
A3	The Secondary Water Chemistry Monitoring, Primary Coolant Sources Outside Containment, and Iodine Monitoring license conditions (FOL 2.C(3)(p), 2.C(5) and 2.C(6) Respectively) will be moved to equivalent programmatic requirements in PTS Section 6.5, "Programs and Manuals." The PTS programmatic administrative controls specification is consistent current plant practice, and meets the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative.	FOL 2.C(3)(p) FOL 2.C (5) FOL 2.C (6)	6.5.10 6.5.2 6.5.3
A4	CTS 4.7.6.1.2.b, c, e, and f and 4.9.11.2.a, b, d, and e is relocated to PTS 6.5.11, "Ventilation Filter Testing Program." The presentation of the requirements for ventilation filter testing is revised for consistency. All frequencies and methods are replaced by a reference to perform the testing at the frequencies specified in Regulatory Guide 1.52, Revision 2. Since there are no actual changes in the frequencies, this change is considered to be one of presentation only, and therefore, administrative in nature.	4.7.6.1.2.b, c, e, and f 4.9.11.2.a, b, d, and e	6.5.11
A5	Not Used	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A6	CTS 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, is being deleted (see DOC A11). Accordingly, references to it in various specifications are also being deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change to the various specifications will only reference that the report should be submitted to the NRC.	Table 3.3-6, Item 1.b Action 18 Item 2.c Action 19; Table 3.3-10 Actions 3.b & 4.b; 4.4.5.5 3.5.2 Action b 3.5.3 Action b 3.7.12 Action a	Table 3.3-6 Item 1.b Action 18 Item 2.c Action 19; Table 3.3-10 Actions 3.b & 4.b; 6.6.7.c 3.5.2 Action b 3.5.3 Action b 3.7.12 Action a
A7	A new Action e will be added to TS 3.7.6.1 to direct entry into LCO 3.0.3 while in Modes 1, 2, 3, or 4 if both trains of CREVS are inoperable for reason other than an inoperable control room boundary or if both trains of the CREACS are inoperable. This is equivalent to the CTS requirements and is needed as an explicit condition due to the addition of Action d.	3.0.3	3.7.6.1 Action e
A8	PTS 4.7.6.1.2.c directs performance of Control Room Emergency Ventilation filter testing in accordance with the PTS 6.5.11 "Ventilation Filter Testing Program (VFTP)." This change is administrative. CTS 4.7.6.1.2.b, c, d.1, e, and f, which directed performance of filter testing, will be moved to the PTS 6.5.11. PTS Surveillance Requirement 4.7.6.1.2.c will ensure that the requirements of the VFTP are met.	4.7.6.1.2.b, c, d.1, e, and f	4.7.6.1.2.c 6.5.11
A9	Surveillance Requirement 4.7.8.h refers to Specification 6.10.2, which was deleted from the ANO-2 TSs with Amendment 209 (Safety Evaluation dated August 26, 1999). The reference to Specification 6.10.2 was inappropriately left in SR 4.7.8.4. The proposed change will delete the reference to Specification 6.10.2.	4.7.8.h	4.7.8.h
A10	PTS 3.8.1.3 Action 4 provides the administrative direction to go to PTS 3.8.1.1 Actions or 3.8.1.2 Actions associated with PTS 3.8.1.3 Actions 1, 2, and 3.	N/A	3.8.1.3 Action 4

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A11	<p>This CTS information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TSs when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC. (§ = 10 CFR)</p> <p>CTS Table 6.2.1 §50.54(m)(2)(i) CTS Table 6.2.1 Note * §50.54(m)(2)(iv) CTS 6.2.2.a §50.54(m)(2)(i) CTS 6.2.2.b §50.54(m)(2)(iii) and 50.54(k) CTS 6.2.2.c §50.54(m)(1) and (m)(2)(iii) CTS 6.2.2.e §50.54(m)(2)(iv) CTS 6.7.1.c §50.36, §50.72, and §50.73 CTS 6.9.1 §50.4 CTS 6.9.2 §50.4 CTS 6.9.5.3 §50.4</p>	<p>Table 6.2.1 Table 6.2.1 Note * 6.2.2.a 6.2.2.b 6.2.2.c 6.2.2e 6.7.1.c 6.9.1 6.9.2 6.9.5.3</p>	N/A
A12	The non-licensed operator requirements, which are currently contained in CTS 6.2.2.a and CTS Table 6.2-1, are being consolidated in PTS 6.2.2.a, without change.	6.2.2.a, Table 6.2.-1	6.2.2.a
A13	The change modified the title of “ANO-2 plant manager” to “Plant Manager Operations.” This change is an organization change at ANO that resulted in one plant manager between the two units.	6.1.1 6.2.1.b	6.1.1 6.2.1.b
A14	CTS 6.7 will be deleted due to changes made by DOCs A11 and L12. CTS 6.7.1.a is redundant to information included in Section 2.1, “Safety Limits.”	6.7 6.7.1.a	2.1
A15	Not Used	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A16	A statement regarding the applicability of SR 4.0.2 and 4.0.3 will be added to CTS 6.8.4.a. This statement is consistent with the intent and current practices of performing periodic surveillance in the Radioactive Effluent Controls Program. Since no change to regulatory requirements is made this change is considered administrative.	6.8.4.a	6.5.4
A17	CTS 6.9.1.4 provides an introductory paragraph to CTS 6.9.1.5, which includes a listing of the required annual reports. The paragraph will be deleted with the submittal date moved to the individual report. The individual reporting criteria adequately describe the required data and therefore this paragraph serves no purpose.	6.9.1.4	6.6.1 6.6.7 6.6.8
A18	CTS 6.9.1.5.a is modified to reflect the correct 10 CFR 20 terminology for the units of occupational exposure. A statement limiting the report scope to those persons monitored is added as a statement of the obvious. Lastly, the pocket dosimeter will be revised to refer to a pocket ionization chamber and the electronic dosimeter will be specified as an additional means of collecting the exposure data. These changes are considered administrative since they result in no relaxation of requirements, result in compliance with 10 CFR 20, more accurately reflect the principal of operation of the pocket dosimeter, and acknowledge industry usage of advanced dosimetry devices.	6.9.5.a	6.6.1
A19	The " $\leq 0.60 L_a$ " limits specified in CTS 6.1.5.a for acceptable type B and C test leakage will be corrected to " $< 0.60 L_a$ " for consistency with the acceptance criteria provided in 10 CFR 50, Appendix J. Therefore, this change has no impact on application of the regulations and is considered administrative.	6.15.a	6.5.16.a
A20	CTS 4.4.5.5 will be moved to and will replace the wording in CTS 6.9.1.5.b, which requires that the criteria specified in CTS 4.4.5.5 be included in the report. The new specification will become PTS 6.6.7. The relocation results in no change to the reporting requirements.	4.4.5.5 6.9.1.5.b	6.6.7

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A21	CTS 6.9.3 will be revised to reflect the reporting requirements consistent with 10 CFR 20 and 10 CFR 50.36a and minor editorial changes. These changes are considered purely administrative because they do not relax CTS requirements and are consistent with 10 CFR 20.1301.	6.9.3	6.6.3
A22	CTS 6.8.1.a (PTS 6.4.1.a) requires that written procedures shall be established, implemented, and maintained for applicable procedures recommended in RG 1.33, Revision 2, Appendix A. CTS 6.8.1.b, c, and h require that procedures for refueling operations, surveillance and test activities of safety related equipment, and new and spent fuel storage, respectively, be established, implemented, and maintained. These procedures are included in RG 1.33 and therefore duplicate the requirements of PTS 6.4.1.a. CTS 6.8.1.b, c and h will be deleted.	6.8.1.b, c, and h	6.4.1.a
A23	The FOL 2.C.(3)(p) requirement to define the secondary water chemistry monitoring program in plant procedures will be deleted. PTS 6.4.1.d requires that procedures be written, implemented and maintained for the programs included in Specification 6.5. Therefore, inclusion of a requirement to maintain a plant specific procedure to describe the program in PTS 6.5.10 is redundant to the requirement of PTS 6.4.1.d.	FOL 2.C(3)(p)	6.4.1.d 6.5.10
A24	Not Used	N/A	N/A
A25	Not Used	N/A	N/A
A26	Written communication to the NRC is described in 10 CFR 50.4. Although the CTS requires that the reports be submitted to the Administrator of the Regional Office only, 10 CFR 50.4 provides distribution requirements for written communications to the NRC which includes the Administrator of the Regional Office. Since 10 CFR 50.4 is used as the justification for the changes associated with DOCs A6 and A11, deleting the reference to the Administrator of the Regional Office is an administrative change.	6.9.2	N/A

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A27	CTS 6.8.1.a requires that procedures recommended in Appendix "A" of RG 1.33 be established, implemented, and maintained. CTS 6.8.1.a will be retained as PTS 6.4.1 a. The requirement of CTS 6.11 to maintain procedures for the radiation protection program will be deleted as it is redundant to the requirements of PTS 6.4.1.a.	6.11	6.4.1.a
A28	The designated change results in the correction of a reference to TS 3.3.3.9 which was relocated to the ODCM with the approval of ANO-2 TS Amendment 193 (NRC Safety Evaluation dated September 23, 1998).	Table 3.3-6, Item 2.a Action 16c	Table 3.3-6, Item 2.a Action 16c
A29	The designated change results in the correction of the instrument measurement range for instruments located on the Remote Shutdown Monitoring panel. The change in instrument range is consistent with the actual plant instrumentation and does not result in a change to the existing TS requirements. The proposed change result in no additional or reduced restrictions nor does it add any flexibility.	Table 3.3-9 Items 2 and 9	Table 3.3-9 Items 2 and 9
A30	The proposed change deletes confusing information. TS 3.8.1.1.b.1 and 3.8.1.2.b.1 specify that diesel generators must have, in part, a day fuel tank containing a minimum of 280 gallons of fuel (equivalent to 50% of indicated tank volume). The actual maximum tank volume is 550 gallons, 50% of which is 275 gallons. Therefore, the 50% volume and the 280 gallons, specified in the action present conflicting information. The deletion of the parenthetical statement related to 50% of indicated tank volume will result in a more conservative volume proposed by DOC M16 remaining in TS 3.8.1.1.b.1. The proposed change does not result in additional or reduced restrictions nor does it result in added flexibility.	3.8.1.1.b.1 3.8.1.2.b.1	3.8.1.1.b.1 3.8.1.2.b.1
A31	CTS 4.4.5.0 contains the following note: "The requirements for inservice inspection do not apply during the steam generator replacement outage (2R14)." The steam generator replacement outage is complete, thus the note is no longer applicable and can be deleted.	4.4.5.0 Note	N/A
A32	Not Used	N/A	N/A

TABLE A - ADMINISTRATIVE CHANGES

DOC #	SUMMARY	CTS	PTS
A33	CTS 6.8.4.a.10) is modified to state that the limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC are only applicable to those individuals who are beyond site boundary. This is an administrative change consistent with the definition of MEMBER OF THE PUBLIC contained in 40 CFR 190.	6.8.4.a.10)	6.5.4.j
A34	The information in CTS 3/4.8.1.1 and 3/4.8.1.2 on diesel generator fuel oil storage capacity is moved to PTS 3/4.8.1.3.	3.8.1.1.b.2 4.8.1.1.2.a.2 3.8.1.2.b.2	3.8.1.3 4.8.1.3 3.8.1.3
A35	Cumulative dose contributions are determined for the current calendar quarter and the current calendar year. However, the projected doses are not determined for an <u>entire</u> calendar quarter or calendar year. In addition, the CTS wording states that the dose contributions will be determined using the <u>methodology and parameters</u> in the ODCM. Since there is no practical difference between “methodology and parameters” and “methodology,” the proposed change eliminates the word “parameters” from the sentence. Thus the proposed change is an administrative change that provides clarity to the intended requirements for determining cumulative and projected dose contributions.	6.8.4.a.5	6.5.4.e
A36	CTS 4.8.1.1.2.b specifies the requirements for testing of the diesel generator stored fuel oil properties. These details are retained in new PTS 6.5.13, Diesel Fuel Oil Testing Program, and corresponding SRs, PTSs 4.8.1.3.1 and 4.8.1.3.2, are added. These SRs require verifying fuel oil properties of new (See DOC M1) and stored fuel oil are maintained within the limits by testing in accordance with the Diesel Fuel Oil Testing Program. The surveillance frequencies will be in accordance with PTS 6.5.13. The proposed SRs provide a link to assure the proposed diesel fuel oil testing program is implemented. This change is administrative because it only changes the presentation of the current diesel fuel testing requirements.	4.8.1.1.2.b	4.8.1.3.2 6.5.13

TABLE M - MORE RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS
M1	CTS 4.8.1.1.2.b will be revised to include testing of new fuel oil. Immediate confirmation of fuel oil quality after adding new fuel oil to the bulk storage tank will provide added assurance of acceptable fuel oil. This is an additional restriction on the unit.	4.8.1.1.2.b	4.8.1.3.2 6.5.13
M2	By deleting the specific Regulatory Guide (RG) 1.52 section references from CTSs 4.7.6.1.2.b and 4.9.11.2.a, the associated PTS Section 6.5.11 will ensure all applicable RG 1.52 ventilation filter testing frequencies and criteria are applied to the TS-required ventilation filter systems. This results in a more restrictive change to unit operation because applicable RG 1.52 testing not specifically detailed in the CTSs are not currently performed under the current filter testing program at ANO-2.	4.7.6.1.2.B 4.9.11.2.1	6.5.11
M3	CTS Table 3.3-6, Action 20 addresses the condition of one inoperable channel of the control room isolation on high radiation instrumentation Function 2.b. After 7 days in this condition, Action 20 allows an additional 6 hours to initiate and maintain operation of the Control Room Emergency Ventilation System (CREVS). This additional 6 hours is deleted. If the isolation instrumentation is not restored, the actuation of CREVS can easily be implemented within the initial 7 days.	Table 3.3-6, Item 2.b Action 20	Table 3.3-6, Item 2.b Action 20
M4	A statement is added to Actions 17 and 20 to provide the appropriate default condition to be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN in the following 30 hours. Currently if the Action is not met, LCO 3.0.3 is entered, which allows one hour to take actions to place to the unit in a mode in which the associated instrumentation LCOs are not applicable. By specifying the action to go to HOT STANDBY and COLD SHUTDOWN in Actions 17 and 20, the initial one hour of LCO 3.0.3 is no longer allowed, which is more restrictive.	Table 3.3-6, Item 2.b Actions 17 and 20	Table 3.3-6, Item 2.b Actions 17 and 20

TABLE M - MORE RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS
M5	Note 2 of CTS Table 3.3-6, requires Item 2.b, the control room ventilation intake duct [radiation] monitors to be operable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. Associated Actions 17 and 20 explicitly specify remedial measures for failure to meet the LCO during Modes 1 through 4. The proposed change creates associated Action 21 to separately and explicitly specify remedial measures for failure to meet the LCO during movement of irradiated fuel assemblies. The proposed change is considered more restrictive because the required action and completion time specified in Action 21 is explicit instead of implied, which was the case in Actions 17 and 20.	Table 3.3-6, Item 2b Note 2 and Actions 17 and 20	Table 3.3-6, Item 2b and Action 21
M6	PTS 3.8.1.3 ACTION 3 allows 30 days to restore properties of stored fuel oil to within limits if the new fuel oil added to the storage tank is determined to be outside the limits specified by the diesel fuel oil testing program. This is more restrictive because CTSs specify no time period to complete this implied action.	N/A	3.8.1.3 Action 3
M7	CTS 6.3.1 is updated to reflect the latest changes to the Quality Assurance Program Manual (QAPM) approved by the NRC on November 6, 1998. Unit staff qualifications are revised to reflect commitments to ANSI ANS 3.1-1978 (in lieu of ANSI N18.1-1971). This change increases experience and education requirements for certain positions of the unit staff, and is therefore more restrictive.	6.3.1	6.3.1
M8	PTS 6.4.1.d adds requirements to provide procedures for each of the programs identified in PTS Section 6.5, "Programs." The proposed change is an additional explicit restriction on unit operation. Further, CTS 6.8.1.i, regarding ODCM and Process Control Program (PCP) implementation, is moved to PTS Section 6.5. PTS 6.5.1 requires written procedures for the ODCM. Therefore, the ODCM and PCP do not need to be listed separately in Section 6.4.1.	6.8.d 6.8.i	6.4.1.d 6.5.1
M9	A new requirement is added to maintain the emergency operating procedures in accordance with the requirements in NUREG-0737 and NUREG-0737, Supplement 1, as stated in Section 7.1 of Generic Letter 87-33.	N/A	6.4.1.b
M10	Not Used	N/A	N/A

TABLE M - MORE RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS
M11	PTSs 4.7.6.1.2.d and 4.7.6.1.2.e are new SRs to require verification of the CREVS makeup flow rate when supplying the control room with outside air. Note that different acceptance criteria for the makeup flow rates are required for each fan due to design differences.	N/A	4.7.6.1.2.d 4.7.6.1.2.e
M12	Not Used	N/A	N/A
M13	CTSs 4.7.6.1.2.d.1 and 4.9.11.2.c change to include prefilters and "roughing" filters in the ventilation system differential pressing testing requirement in corresponding PTS 6.5.11.d.	4.7.6.1.2.d.1 4.9.11.2.c	6.5.11.d
M14	CTS 4.8.1.1.2.b requires sampling of the diesel fuel from the fuel storage tank at least once per 92 days. Corresponding PTS 6.5.13.c changes the testing frequency to every 31 days.	4.8.1.1.2.b	6.5.13.c
M15	The surveillance frequency of "Not To Exceed Refueling Cycle Intervals" is changed to "At Least Once Per 18 months". This is a more restrictive frequency interval.	FOL 2.C.(s).2	6.5.2.b
M16	The minimum required volume of the emergency diesel generator day tank is changed from 280 gallons to 300 gallons.	3.8.1.1.b.1 3.8.1.2.b.1	6.8.1.1.b.1 6.8.1.2.b.1

TABLE LA - RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS

DOC #	CTS	SUMMARY	LOCATION	CHANGE CONTROL	TYPE
LA1	4.7.6.1.2.b 4.7.6.1.2.c 4.7.6.1.2.d.1	Procedural details for control room emergency ventilation system filter testing	TRM	10 CFR 50.59	2
	4.8.1.1.2.b	Procedural details for stored diesel fuel oil testing	Site Procedures	10 CFR 50.59	2
	4.9.11.2	Procedural details for fuel handling area ventilation system filter testing	TRM	10 CFR 50.59	2
LA2	FOL 2.C.(6)	Details of the facility locations included in the scope of Iodine Monitoring Program	SAR	10 CFR 50.59	1
	4.7.6.1.2.a 4.7.6.1.2.d.2	Design details of the control room emergency air filtration system	Bases 4.7.6.1.2.a	Bases Control Program	1
			Bases 4.7.6.1.2.b	Bases Control Program	1
	6.9.1.1	Startup Report - conditions requiring a report	TRM	10 CFR 50.59	2
	6.9.1.2	Startup Report - content	TRM	10 CFR 50.59	2
6.9.1.3	Startup Report - schedule	TRM	10 CFR 50.59	2	
LA3	N/A	Moved to Table L.	N/A	N/A	N/A
LA4	6.1.4.b	Replaces plant specific titles with generic titles and relocates the plant specific titles.	SAR	10 CFR 50.59	3

LA-type Change Types

1. Details of System Design and System Description Including Design Limits
2. Procedural Details for Meeting TS Requirements and Related Reporting Requirements
3. Relocated Administrative Controls

TABLE L - LESS RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS	CATEGORY
L1	PTSs 4.8.1.3.2 and 6.5.13.c only require the periodic testing (every 31 days) of stored fuel for particulate concentration rather than all the ASTM-D975-74 properties required by CTS 4.8.1.1.2.b.	4.8.1.1.2.b	4.8.1.3.2 6.5.13.c	III
L2	Note 6 will be added to CTS Table 4.3-3. The note provides a 3-hour time period to conduct a CHANNEL FUNCTIONAL TEST (CFT) of a control room ventilation intake duct radiation monitor without entering the applicable specified action requirements of PTS Table 3.3-6 (PTS Actions 17, 20, and 21). During conduct of the CFT, the monitor is rendered inoperable.	Table 4.3-3, Item 2.b	Table 4.3-3, Item 2.b, Note 6 to CFT	IV and V
L3	The requirements of CTS 3.7.6.1 will be revised to allow the control room boundary to be opened intermittently under administrative controls, and to allow both CREVS trains to be inoperable for 24 hours if the control room boundary is inoperable. This condition is not defined in the CTSs and would currently require entry into LCO 3.0.3. (TSTF-287)	3.7.6.1 3.7.6.1 Actions 3.0.3	3.7.6.1 Note 1 3.7.6.1 Action d	V II & IV
L4	When the volume of fuel in a DG's fuel storage tank is not \geq 22,500 gallons, the licensee must follow the requirements of CTS 3.8.1.1 Actions b and c (for 1 DG made inoperable), or Action e (if both DGs are made inoperable). PTS 3.8.1.3 Action 1 will allow one or both fuel storage tanks to each contain less than 22,500 gallons of fuel for up to 48 hours as long as the volume of each storage tank is greater than 17,446 gallons. When the volume is between 17,446 and 22,500 gallons, the PTSs will allow an additional 48 hours to restore the volume to \geq 22,500 gallons prior to declaring the associated DG inoperable.	3.8.1.1 Actions b, c, and e	3.8.1.3 Action 1	IV

TABLE L - LESS RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS	CATEGORY
L5	When the properties of a DG's stored fuel oil supply is discovered to be outside the limits of ASTM-D975-74, the licensee must follow the requirements of CTS 3.8.1.1 Actions b and c (for 1 DG made inoperable), or Action e (if both DGs are made inoperable). In the event the property of total particulate concentration exceeds the specified limit, PTS 3.8.1.3 Action 2 will allow an additional seven (7) days to restore the stored fuel oil total particulates to within the required limits prior to declaring the associated diesel generator inoperable.	3.8.1.1 Actions b, c, and e	3.8.1.3 Action 2	IV
L6	PTS 6.2.2.d will allow the radiation protection position to be vacant for not more than 2 hours in order to provide for an unexpected absence. (A similar allowance is granted to licensed operators and is included in CTS Table 6.2-1 Note #.)	6.2.2.d	6.2.2.d	VI
L7	PTS 6.2.2.g will allow the Shift Technical Advisor (STA) to support the shift crew instead of only the shift supervisor. The change provides more flexibility to the STA and the crew and is consistent with the actual practice of the STA.	6.2.2.f	6.2.2.g	VI
L8	PTS 6.2.2.c will allow the STA position to be vacant for up to two hours in order to provide for an unexpected absence. This will allow needed staffing flexibility. Prior to the approval of TS Amendment 209 (Safety Evaluation(SE) dated August 26, 1999), the requirement to have an STA was included in Table 6.2-1 and the associated # note allowed for unexpected vacancies applied. The two hour allowance for vacancy was inappropriately disassociated from the STA in Amendment 209.	Table 6.2-1	6.2.2.c	VI

TABLE L - LESS RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS	CATEGORY
L9	CTS 6.9.1.5.a defines the requirements for Occupational Radiation Exposure Report. The submittal date for this report, specified in CTS 6.9.1.4 or March 1, will be revised such that the report is submitted by April 30 of each calendar year. This change is consistent with the comprehensive revisions to 10 CFR 20.	6.9.1.4 6.9.1.5.a	6.6.1	VII
L10	The requirements for high radiation areas in CTS 6.13 will be revised to include additional previously approved methods for implementation of alternatives to the “control device” or “alarm signal” requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas.	6.13	6.7.1 6.7.2	VIII
L11	CTS 4.7.6.1.2.d.2 is renumbered as PTS 4.7.6.1.2.b and is modified to verify that the control room emergency air filtration system automatically isolates and switches to “a recirculation mode of operation” by using an actual as well as a simulated (test) actuation signal (in this case, control room high radiation). This allows satisfactory automatic system initiations for other than surveillance purposes to be used to fulfill the surveillance requirements.	4.7.6.1.2.d.2	4.7.6.1.2.b	III
L12	CTS 6.7.1.b requires notification of the Vice President, Operations ANO within 24 hours of violating a safety limit. This notification is administratively controlled as part of the ANO corrective action process and will be deleted.	6.7.1.b	N/A	VI

TABLE L - LESS RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS	CATEGORY
L13	<p>CTS 6.9.1.4 requires the submittal of any annual reports described in CTS 6.9 prior to March 1 of each year. Therefore, the submittal of the annual report associated with CTS 6.9.3 "Radioactive Effluent Release Report" is due prior to March 1 of each year. The proposed change revises the submittal date to prior to May 1 each year, to be consistent with the due date for the Unit 1 report. This will enable combining the Unit 1 and Unit 2 reports into a single report each year.</p>	<p>6.9.1.4 6.9.3</p>	6.6.3	VII
L14	Not Used	N/A	N/A	N/A
L15	<p>FOL 2.C(5) does not allow an extension of the surveillance frequency requirement for this license condition. FOL 2.C(5) has been relocated to PTS 6.5.2. PTS 6.5.2 is considered a surveillance requirement (SR) and thus the normal surveillance intervals that are specified in the Limiting Condition for Operation (LCO) section that allow a 25% extension of the frequency in accordance with SR 4.0.2 are applicable to PTS 6.5.2. Because SR 4.0.2 applies to the LCO section of procedures, it is necessary to reference its applicability to PTS 6.5.2. (TSTF-299)</p>	FOL 2.C(5)	6.5.2.b	I
L16	Not Used	NA	N/A	NA

TABLE L - LESS RESTRICTIVE CHANGES

DOC #	SUMMARY	CTS	PTS	CATEGORY
LA3	Deletes the requirements to include documentation of challenges to the pressurizer safety valves, and the commitment to include documentation of the challenges to low temperature overpressure protection (LTOP) relief valves in the annual operating report.	6.9.1.5.c	N/A	VII

L-type Change Categories

- | | | | |
|-----|--|------|---|
| I | Relaxation of Surveillance Frequency | V | Relaxation of LCO |
| II | Relaxation of Action Requirements for Exiting LCOs | VI | Relaxation of Administrative Requirements |
| III | Relaxation of Surveillance Requirement Acceptance Criteria | VII | Elimination or Relaxation of CTS Reporting Requirements |
| IV | Relaxation of Required Action Completion Time | VIII | Relaxation of CTS Radiation Requirements |