INDIANA MICHIGAN POWER
A unit of American Electric Power

Indiana Michigan Power
Cook Nuclear Plant
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April 15, 2005

AEP:NRC:5901-01
10 CFR 50.90

Docket Nos. 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant, Units 1 and 2
COMMENTS ON DONALD C. COOK NUCLEAR PLANT
DRAFT SAFETY EVALUATION FOR THE CONVERSION TO
IMPROVED TECHNICAL SPECIFICATIONS
(TAC NOS. MC2629 AND MC2630)

References:

1. Letter from J. Donohew, Nuclear Regulatory Commission, to M. K. Nazar, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Draft Safety Evaluation for the Conversion to Improved Technical Specifications (TAC Nos. MC2629 and MC2630)," dated October 1, 2004.

2. Letter from J. Donohew, Nuclear Regulatory Commission, to M. K. Nazar, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Draft Final Safety Evaluation for the Conversion to Improved Technical Specifications (TAC Nos. MC2629 and MC2630)," dated March 31, 2005.

3. Letter from J. N. Jensen, Indiana Michigan Power Company, to Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Supplement to License Amendment Request - Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS), (TAC Nos. MC2629 and MC2630)," AEP:NRC:5901, dated April 15, 2005.

Dear Sir or Madam:

By References 1 and 2, the U. S. Nuclear Regulatory Commission (NRC) issued a draft and draft final Safety Evaluation (SE) for the conversion of the Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2 current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) consistent with Improved Standard Technical Specifications as described in NUREG-1431, "Standard Technical Specifications – Westinghouse Plants," Revision 2, and certain generic changes to the NUREG.

Following issuance of the draft SE in Reference 1, Indiana Michigan Power Company (I&M) provided informal comments based upon the status of NRC review of the original License Amendment Request for the conversion to the ITS at that time. These comments have been incorporated by the NRC in the draft final SE provided in Reference 2 to the satisfaction of I&M. Based upon the completion of the NRC review of the original License Amendment Request, I&M provided a supplement to the original License Amendment Request in Reference 3. The purpose of this letter is to provide the final comments on the draft SE in Reference 1 and the draft amendments in Reference 2 to be consistent with Reference 3.

Attachment 1 is a copy of the draft SE and draft SE Attachment 1 with changes proposed by I&M shown using red, strikeout text for deleted text and bold, blue text for added text. These changes are consistent with the supplement to the original License Amendment Request in Reference 3. Attachments 2 through 6 are copies of the final SE tables to replace Attachments 2 through 6 of the draft SE, with changes incorporated that are consistent with the Discussion of Changes provided in Reference 3. Enclosure 2 provides comments on the draft amendments in Reference 2 to ensure consistency with the supplement to the original License Amendment Request in Reference 3. As of the date of this letter, there are no outstanding open items that are anticipated to require any change to the documents provided.

Enclosure 1, "Affirmation," provides an oath and affirmation affidavit regarding the statements made and matters set forth in this submittal.

This letter contains no commitments. If you have any questions or require additional information, please contact Mr. Richard J. Grumbir, Project Manager, ITS, at (269) 697-5141.

Sincerely,

M. K. Nazar
Senior Vice President and Chief Nuclear Officer

GW/rdw

Enclosure:

1. Affirmation
2. Comments on the Draft Amendments for the Conversion to Improved Technical Specifications

Attachments:

1. Markup of Draft Safety Evaluation for the Conversion to Improved Technical Specifications, Including Attachment 1
2. Replacement Pages for Draft Safety Evaluation Attachment 2, Table A - Administrative Changes
3. Replacement Pages for Draft Safety Evaluation Attachment 3, Table M - More Restrictive Changes
4. Replacement Pages for Draft Safety Evaluation Attachment 4, Table L - Less Restrictive Changes
5. Replacement Pages for Draft Safety Evaluation Attachment 5, Table LA - Removed Details
6. Replacement Pages for Draft Safety Evaluation Attachment 6, Table R - Relocated Specifications

NOTE

A single copy of this cover letter, enclosure, and attachments is being submitted to the NRC Document Control Desk. In addition, a single CD-ROM suitable for use for entry of this complete submittal into the NRC Agencywide Documents Access and Management System (ADAMS) is being provided. The single copy of the submittal and CD-ROM provided meet the applicable requirements of Regulatory Issue Summary (RIS) 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM." Additional CD-ROMs are provided for the persons designated below.

c: T. H. Boyce, NRC Washington, DC, w/o attachments, with CD-ROM
J. L. Caldwell, NRC Region III, w/o attachments, with CD-ROM
K. D. Curry, Ft. Wayne AEP, w/o enclosure/attachments
J. N. Donohew, NRC Washington, DC, w/o attachments, with CD-ROM
P. C. Hearn, NRC Washington, DC, w/o attachments, with CD-ROM
J. T. King, MPSC, w/o enclosure/attachments
C. F. Lyon – NRC Washington DC, w/o attachments, with CD-ROM
MDEQ – WHMD/HWRPS, w/o enclosure/attachments
NRC Resident Inspector, w/o attachments, with CD-ROM

AFFIRMATION

I, Mano K. Nazar, being duly sworn, state that I am Senior Vice President and Chief Nuclear Officer of American Electric Power Service Corporation and Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

American Electric Power Service Corporation

M. K. Nazar
Senior Vice President and Chief Nuclear Officer

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 15th DAY OF April, 2005

Notary Public

My Commission Expires 6/10/2007

BRIDGET TAYLOR
County of Berrien
NOTARY
PUBLIC
Expires
06-10-2007
STATE OF MICHIGAN

Comments on the Draft Amendments
for the Conversion to Improved Technical Specifications

The following additional comments are provided for the draft amendments for the conversion of the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2. The draft amendments were provided by the Nuclear Regulatory Commission (NRC) to Indiana Michigan Power Company (I&M) by letter dated March 31, 2005. These comments are necessary to address changes that have been mutually agreed upon by the NRC and I&M occurring after issuance of the initial draft SE by the NRC on October 1, 2004, and which are described separately in Attachments 1 through 6 of this letter.

1. As discussed with the NRC Staff, I&M proposes an additional change to the new Unit 1 License Condition 2.C.(14) and Unit 2 License Condition 2.C.(3)(ab) that detail the schedule requirements for implementing new and revised Surveillance Requirements (SRs). Specifically, I&M proposes that these new License Conditions state the following (with changes shown in *italics*):

   "<u>Schedule for New and Revised Surveillance Requirements (SRs)</u>

   The schedule for performing the new or revised SRs in License Amendment No. XXX shall be as follows:

   For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.

   For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

   For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment*, except as noted below for SRs that have modified acceptance criteria as a result of revised Allowable Values*.

   For SRs that have modified acceptance criteria as a result of revised Allowable Values, the current Allowable Values and current CHANNEL CALIBRATION frequencies are required to be met until the trip setpoints are changed to reflect the new Allowable Values and CHANNEL CALIBRATION frequencies. The trip setpoints are required to be changed no later than the unit startup after the first planned outage of sufficient duration

to change all of the trip setpoints for the unit following implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment*, except as noted above for SRs that have modified acceptance criteria as a result of revised Allowable Values*."

The additional change is necessary to accommodate implementing the ITS prior to modifying the actual trip setpoints for selected Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation. These physical changes to the RTS and ESFAS instrumentation trip setpoints are necessary based on the request to extend the frequency for CHANNEL CALIBRATION from 18 months to 24 months for this instrumentation, which results in new calculated Allowable Values and nominal trip setpoints. The additional change to the new License Conditions would allow I&M to implement all, some, or none of these physical trip setpoint changes at the time that ITS is implemented, as long as certain conditions are met. First, the existing acceptance criteria for CHANNEL OPERATIONAL TEST and CHANNEL CALIBRATION of the instrumentation, the existing CTS Allowable Values, and a frequency of 18 months for CHANNEL CALIBRATION, is required to be met until the trip setpoints are physically changed to the new values. Second, all trip setpoints shall be physically changed to the new values no later than the unit startup after the first planned outage of sufficient duration to change all of the trip setpoints for the unit following implementation of the amendment. This additional change is consistent with other ITS conversions that involved physical changes to RTS and ESFAS instrumentation trip setpoints, including Dresden Nuclear Power Station, Units 2 and 3 (Amendment No. 185 to Facility Operating License No. DPR-19 and Amendment No. 180 to Facility Operating License No. DPR-25 for the Dresden Nuclear Power Station, Units 2 and 3, respectively, dated March 30, 2001, ADAMS Accession Number ML011130121).

2. I&M requests an implementation date of no later than October 31, 2005, which is an implementation period of at least 180 days from the anticipated date of issuance of the NRC final SE for the conversion of the CTS to the ITS. This implementation period is necessary to allow adequate time to adequately prepare the procedure revisions, and implement work control scheduling changes, required to support the new ITS SR requirements, and is consistent with past industry precedence.

Attachment 1 to AEP:NRC:5901-01

MARKUP OF DRAFT SAFETY EVALUATION FOR THE CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, INCLUDING ATTACHMENT 1

DRAFT SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. TO FACILITY OPERATING LICENSE NO. DPR-58

AND AMENDMENT NO. TO FACILITY OPERATION LICENSE NO. DPR-74

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By application dated April 6, 2004, as supplemented by letter~~s~~ dated ~~**September XX, 2004, and November XX, 2004**~~**April XX, 2005**, the Indiana Michigan Power Company (the licensee), requested changes to the Technical Specifications (TSs) for the Donald C. Cook Nuclear Plant (~~**DC**~~C**NP**), Units 1 and 2 to convert the current TSs (CTS) to improved TSs (ITS).

The draft SE is based on the application dated April 6, 2004, and the information provided to the NRC through the C~~**ook**~~**NP** ITS Conversion web page. To expedite its review of the application, the NRC staff issued its requests for additional information (RAIs) through the C~~**ook**~~**NP** TS Conversion web page and the licensee addressed the RAIs by providing responses on the web page. Entry into the database is protected so that only licensee and NRC reviewers can enter information into the database to add RAIs (NRC) or providing responses to the RAIs (licensee); however, the public can enter the database to only read the questions asked and the responses provided. To be in compliance with 10 CFR 50.4 for written communications for license amendment requests and to have the database on the ~~**DC**~~C**NP** dockets before the amendments would be issued, the licensee will submit a copy of the database in a submittal to the NRC after there are no further RAIs. The public can access the database through the NRC web site at www.nrc.gov by the following process: (1) click on the tab labeled "Nuclear Reactors" on the NRC home page along the upper part of the web page, (2) then click on the link to "Operating Reactors" which is under "Regulated Activities" on the left hand side of the web page, (3) then click on the link to "Improved Standard Technical Specifications" which is on right hand side of the page, and (4) finally click on the link to "Comments on the application and responses by D. C. Cook," near the bottom of the web page, to open the database. The RAIs and responses to RAIs are organized by ITS Sections 1.0, 2.0, 3.0, 3.1 through 3.9, 4.0, and 5.0, which are listed first, and the beyond scope issues (BSIs) 1 through 35, which are listed later. For every listed ITS section or BSI, there is an RAI which can be read by clicking on the ITS section or BSI number. The licensee's responses are shown by a solid triangle adjacent to the ITS section or BSI number, and, to read the response, you click on the triangle. To page down through the ITS sections to the BSIs, click on "next" along the top of the page or on "previous" to return to the previous page.

The additional information provided in the supplemental letter~~s~~ dated ~~September XX and November XX, 2004~~**April XX, 2005**, do**es** not expand the scope of the application as noticed and do not change the staff's original proposed no significant hazards consideration determination published in the *Federal Register* on September ~~XX~~**29**, 2004 (~~XX~~**69** FR ~~XXXXX~~**58205**).

2.0 BACKGROUND

~~DC~~C**NP** has been operating with the TSs issued with the original Facility Operating Licenses dated ~~April 5~~**October 25**, 1974 (for Unit 1), and ~~October 29, 1974~~**December 23, 1977** (for Unit 2), as amended. The proposed conversion to the ITS is based upon:

- NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," (**I**STS) Revision ~~1~~**2**, dated April ~~1995~~**30, 2001**;
- The current ~~DC~~C**NP** CTS;
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132); and
- 10 CFR 50.36, "Technical Specifications," as amended July 19, 1995 (60 FR 36953).

Hereinafter, the proposed TSs for ~~DC~~C**NP** are referred to as the ITS, the existing TSs are referred to as the CTS, and the improved standard TSs, such as in NUREG-1431, are referred to as the **I**STS. The corresponding Bases are ITS Bases, CTS Bases, and **I**STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1 to this SE.

In addition to basing the ITS on the **I**STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. During the course of its review, the Nuclear Regulatory Commission (NRC) staff issued several requests for additional information (RAIs) and conducted a series of telephone conference calls and meetings with the licensee. These RAIs, meetings, and conference calls served to clarify the ITS with respect to the guidance in the Final Policy Statement and the **I**STS. In addition, based on these discussions, the licensee also proposed changes of a generic nature that were not in the **I**STS. The NRC staff requested that the licensee submit such generic changes as proposed changes to the **I**STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the ~~DC~~C**NP** ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the ~~DC~~C**NP** Updated **Final** Safety Analysis Report (U**F**SAR)), for which changes to the documents by the licensee are controlled by a regulation (e.g., 10 CFR 50.59) and which may be changed without prior NRC approval. NRC-controlled documents, such as the TSs, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendments, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TSs for ~~DC~~C**NP**, while still satisfying the requirements of 10 CFR 50.36. During its review, the NRC staff relied on the Final Policy Statement and the

ISTS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that the licensee can develop ITS based on ISTS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation of ~~DC~~CNP. This SE also explains the NRC staff's conclusion that the ITS, which are based on the ISTS as modified by plant-specific changes, are consistent with the ~~DC~~CNP current licensing basis and the requirements of 10 CFR 50.36.

The license conditions included in the proposed amendments will make enforceable the following aspects of the conversion: (1) the schedule for the first performance of new and revised surveillance requirements (SRs) (~~four~~five conditions); and (2) the relocation of CTS requirements into licensee-controlled documents as part of the implementation of the ITS~~; and (3) the schedule for completion of actions associated with verifying the maximum test face velocity for the ventilation systems included in ITS Section 5.5.9~~.

The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to ITS is a voluntary process. Therefore, it is acceptable that the ITS differ from the ISTS to reflect the current licensing basis for ~~DC~~CNP. The NRC staff approves the licensee's changes to the CTS with the modifications documented in the licensee's supplemental submittal~~s~~.

For the reasons stated *infra* in this SE, the NRC staff finds that the ITS issued with these license amendments comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accordance with the common defense and security and provide adequate protection of the health and safety of the public.

3.0 REGULATORY REQUIREMENTS

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences. As recorded in the Statements of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports" (33 FR 18610, December 17, 1968), the Commission noted that applicants were expected to incorporate into their TSs "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Pursuant to 10 CFR 50.36, TSs are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings;

(2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TSs. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, utility owners groups and the NRC staff developed ~~improved~~ **I**STS (e.g., NUREG-1431) that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TSs, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1431, Revision 0, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The **I**STS in NUREG-1431 were established as a model for developing the ITS for Westinghouse plants, in general. The **I**STS reflect the results of a detailed review of the application of the Interim Policy Statement criteria to generic system functions, which were published in a "Split Report" issued to the nuclear steam supply system vendor owners groups in May 1988. **I**STS also reflect the results of extensive discussions concerning various drafts of **I**STS so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1431 provide an abundance of information regarding the extent to which the **I**STS present requirements that are necessary to protect public health and safety. The **I**STS in NUREG-1431, Revision ~~1~~**2**, as modified, apply to ~~DC~~C**NP**.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the **I**STS and encouraged licensees to use the **I**STS as the basis for plant-specific TS amendments and for complete conversions to ITS based on the **I**STS. In addition, the Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TSs. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TSs, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the

> imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TSs; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

Criterion 1 *Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

Criterion 2 *A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 3 *A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 4 *A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

Part ~~3~~**4**.0 of this SE explains the NRC staff's conclusion that the conversion of the ~~DC~~C**NP** CTS to ITS based on **I**STS, as modified by plant-specific changes, is consistent with the ~~DC~~C**NP** current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

4.0 EVALUATION

In its review of the ~~DC~~C**NP** ITS application, the NRC staff evaluated five kinds of changes to the CTS as defined by the licensee. The NRC staff's review also included an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements that are removed from the CTS and placed in licensee-controlled documents. The following are the five types of CTS changes:

A Administrative **Changes** - Changes to the CTS that do not result in new requirements or change operational restrictions and flexibility.

M More Restrictive **Changes** - Changes to the CTS that result in added restrictions or reduced flexibility.

~~R Relocated Specifications - Changes to the CTS that relocate the requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii).~~

~~LA Removed Details - Changes to the CTS that eliminate detail and relocate the detail to a licensee-controlled document. Typically, this involves details of system design, system description including design limits, description of system or plant operation, procedural detail for meeting TS requirements and relocated reporting requirements, and redundant requirement references.~~

L~~R~~ Less Restrictive **Changes** - Changes to the CTS that result in reduced restrictions or added flexibility.

LA Removed Details - Changes to the CTS that eliminate detail and relocate the detail to a licensee-controlled document. Typically, this involves details of system design and system description including design limits, description of system operation, procedural details for meeting TS requirements or reporting requirements, and cycle-specific parameter limits and TS requirements redundantly located in other licensee-controlled documents.

R Relocated Specifications - Changes to the CTS that relocate the requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii).

The ITS application included a justification for each proposed change to the CTS in a numbered discussion of change (DOC), using the above letter designations as appropriate. In addition, the ITS application included an explanation of each difference between ITS and **I**STS requirements in a numbered justification for deviation (JFD).

The changes to the CTS, as presented in the ITS application, are listed and described in the following six tables (for each ITS section) attached to this SE:

- Table A - Administrative Changes
- Table M - More Restrictive Changes
- ~~Table R - Relocated Specifications~~
- ~~Table LA - Removed Detail Changes~~
- Table L~~R~~- Less Restrictive ~~Details~~**Changes**
- **Table LA - Removed Details**
- **Table R - Relocated Specifications**

These tables~~, except Table U,~~ provide a summary description of the proposed changes to the CTS, references to the specific CTS requirements that are being changed, and the specific ITS requirements that incorporate the changes. The tables are only meant to summarize the changes being made to the CTS. The details as to what the actual changes are and how they are being made to the CTS or ITS are provided in the licensee's application and supplemental letter~~s. As noted in the table headers, CTS DOCs are not sequentially numbered. Table~~

~~U, therefore, provides a convenient list for unused numbers (of CTS changes) for each ITS section~~.

The NRC staff's evaluation and additional description of the kinds of changes to the CTS requirements listed in Tables A, M, ~~R~~**L**, LA, and ~~L~~R are presented in Sections A through E below, as follows:

- Section A Administrative Changes
- Section B More Restrictive Changes
- ~~Section E Relocated Specifications~~
- ~~Section D Removed Detail Changes~~
- Section C Less Restrictive ~~Details~~**Changes**
- **Section D Removed Details**
- **Section E Relocated Specifications**

The control of specifications, requirements, and information relocated from the CTS is described in Section F below, and other CTS changes (i.e., beyond~~-~~scope ~~changes~~**issues**) are described in Section G below.

A. Administrative Changes to the CTS

Administrative (nontechnical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used the **I**STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

- Identifying plant-specific wording for system names, etc.;
- Splitting up requirements currently grouped under a single current specification and moving them to more appropriate locations in two or more specifications of the ITS;
- Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS;
- Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TSs) but that do not involve a change in requirements;
- Wording changes and additions that are consistent with CTS interpretation and practice and that more clearly or explicitly state existing requirements;
- Deletion of TSs that no longer apply;
- Deletion of details that are strictly informational and have no regulatory basis; and
- Deletion of redundant TS requirements that exist elsewhere in the TSs.

Table A lists the administrative changes being made in the ~~DC~~C**NP** ITS conversion. Table A is organized in **I**STS order by each A-type DOC to the CTS, provides a summary description of the administrative change that was made, and provides CTS and ITS references. The NRC staff

reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and the ISTS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. More Restrictive Changes to the CTS

The licensee, in electing to implement the specifications of the ISTS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the ISTS. Examples of more restrictive requirements are placing an LCO on plant equipment that is not required by the CTS, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the ~~DC~~CNP ITS conversion. Table M is organized in ISTS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive Changes to the CTS

Less restrictive requirements include deletions and relaxations to portions of the CTS requirements that are being retained in the ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on ISTS. The NRC staff reviewed generic relaxations contained in the ISTS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The ~~DC~~CNP design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the ISTS and thus provide a basis for ITS.

All of the less restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of CTS requirements that can be grouped in the following ~~nine~~fourteen ~~types~~categories:

~~Type~~Category 1 - Relaxation of LCO Requirement
~~Type~~Category 2 - Relaxation of Applicability
~~Type~~Category 3 - Relaxation of ~~SR~~Completion Time
~~Type~~Category 4 - Relaxation of Required Action
~~Type~~Category 5 - ~~Relaxation~~Deletion of ~~Completion Time~~Surveillance Requirement
~~Type~~Category 6 - ~~Deletion~~Relaxation of Surveillance Requirement~~s Redundant to Regulations or Design Information~~Acceptance Criteria
~~Type~~Category 7 - Relaxation of Surveillance Frequency~~ from 18 months to~~, Non-24 ~~m~~Month~~s~~ Type
~~Type~~Category 8 - ~~Relaxation~~Deletion of ~~CTS 3.0.C~~Reporting Requirements

~~Type~~**Category** 9 - ~~Relaxation of SR~~**Surveillance** Frequency **Change Using GL 91-04 Guidelines, Non-24 Month Type Change**
Category 10 - 18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type
Category 11 - 18 to 24 Month Surveillance Frequency Change, Channel Calibration Type
Category 12 - Deletion of Surveillance Requirement Shutdown Performance Requirements
Category 13 - Addition of LCO 3.0.4 Exception (Not Used)
Category 14 - Changing Instrumentation Allowable Values

The following discussion addresses why these ~~types~~**categories** of less restrictive changes are acceptable:

~~Type~~**Category** 1 - Relaxation of LCO Requirement

Certain CTS LCOs specify operational and system parameters beyond those necessary to meet safety analysis assumptions and therefore are considered overly restrictive. The CTS also contain limits that have been shown to give little or no safety benefit to the operation of the plant. The ITS, consistent with the guidance in the **I**STS, would delete or revise operating limits of this type. CTS LCO changes of this type include: (1) redefining operating modes, including mode title changes; (2) deleting or revising operational limits to establish requirements consistent with applicable safety analyses; (3) deleting requirements for equipment or systems which establish system capability beyond that assumed to function by the applicable safety analyses or which are implicit to the ITS requirement for systems, components, and devices to be operable; and (4) adding allowances to use administrative controls on plant devices and equipment during times when automatic control is required or to establish temporary administrative limits, as appropriate, to allow time for systems to establish equilibrium operation. TS changes represented by this type allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. They also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. These changes are consistent with the guidance established by the **I**STS in consideration of the ~~DC~~C**NP** current licensing basis and, in view of the above, are acceptable.

~~Type~~**Category** 2 - Relaxation of Applicability

The CTS require compliance with the LCO during the applicable Mode(s) or other conditions specified in the Specification statement. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem, or component specified in the LCO, the LCO would be changed in the ITS to establish a consistent set of requirements. These modifications or deletions are acceptable because, during the conditions referenced in the ITS, the operability requirements are consistent with the applicable safety analyses. These changes are consistent with the guidance established by the **I**STS in consideration of the ~~DC~~C**NP** current licensing basis and, in view of the above, are acceptable.

Category 3 - Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, the TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted. Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis and, in view of the above, are acceptable.

Category 4 - Relaxation of Required Action

LCOs are the lowest functional capability or performance level of equipment required for safe operation of the facility. When an LCO is not met, the CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS-required actions, certain proposed ITS actions would result in extending the time period during which the licensee may continue to operate the plant with specified equipment inoperable. (Upon expiration of this time period, further action, which may include shutting down the plant, is required.) For example, changes of this type include providing an option to (1) isolate a system, (2) place equipment in the state assumed by the safety analysis, (3) satisfy alternate criteria, (4) take manual actions in place of automatic actions, (5) "restore to operable status" within a specified timeframe, (6) place alternate equipment into service, or (7) use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design, and industry practice and do not compromise safe operation of the plant. These changes are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis and, in view of the above, are acceptable.

~~Type 3~~**Category 5** - ~~Relaxation~~**Deletion** of Surveillance Requirement

The CTS require maintaining LCO equipment operable by meeting SRs in accordance with specified SR frequencies. This requires conducting tests to demonstrate (1) equipment is operable or (2) LCO parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes of this ~~type~~**category** relate to ~~relaxation~~**deletion** of CTS SR**s, including deletion of an SR in its entirety, deletion of** acceptance criteria**,** and/or **deleting** the conditions **required** for performing the SR.

~~Relaxing~~**Deleting** the SR**s, including** acceptance criteria **and/or conditions for performing the SRs,** for these items provides operational flexibility, consistent with the objective of the **I**STS, without reducing confidence that the equipment is operable. For example, the ~~ITS would permit the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. The CTS do not allow for the use of an actual actuation signal to satisfy SRs. TS-required features cannot distinguish between an "actual" signal and a "test" signal~~**CTS contain SRs that are not included in the ISTS for a variety of reasons. This includes deletion of SRs for measuring values and parameters that are not necessary to meet ISTS LCO requirements. Also, the ISTS may not include reference to specific acceptance criteria contained in the CTS, because the acceptance criteria are not necessary to meet ISTS LCO requirements, or are defined in other licensee-controlled documents**. The changes to ~~T~~S**R** acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable **as defined by the ISTS**.

~~Relaxing~~**Deleting** conditions for performing SRs include not requiring testing of deenergized equipment (e.g., instrumentation channel checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). The changes also allow verification of the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning valves small. These changes are acceptable because the changes do not affect the ability to determine whether equipment is capable of performing its intended safety function. These ~~relaxations~~**deletions** of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These changes are consistent with the guidance established by the **I**STS in consideration of the ~~DC~~C**NP** current licensing basis and, in view of the above, are acceptable.

~~Type 4 – Relaxation of Required Action~~

~~LCOs are the lowest functional capability or performance level of equipment required for safe operation of the facility. When an LCO is not met, the CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS-required actions, certain proposed ITS actions would result in extending the time period during which the licensee may continue to operate the plant with specified equipment inoperable. (Upon expiration of this time period, further action, which may include shutting down the plant, is required.) For example, changes of this type include providing an option to (1) isolate a system, (2) place equipment in the state assumed by the safety analysis, (3) satisfy alternate criteria, (4) take manual actions in place of automatic actions, (5) "restore to operable status" within a specified timeframe, (6) place alternate equipment into service, or (7) use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design, and industry practice and do not compromise safe operation of the plant. These changes are consistent with the guidance~~

~~established by the STS in consideration of the DCC current licensing basis and, in view of the above, are acceptable.~~

~~Type 5 — Relaxation of Completion Time~~

~~Upon discovery of a failure to meet an LCO, the TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted. Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design-basis accident (DBA) occurring during the repair period. These changes are consistent with the guidance established by the STS in consideration of the DCC current licensing basis and, in view of the above, are acceptable.~~

Category 6 - Relaxation of Surveillance Requirement Acceptance Criteria

Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval thereafter, the CTS require establishing the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test. Relaxations of CTS SRs would include relaxing both the acceptance criteria and the conditions of performance. Also, the ITS would permit the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS-required features cannot distinguish between an "actual" signal and a "test" signal. These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR relaxations are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis.

Category 7 - Relaxation of Surveillance Frequency, Non-24 Month Type

Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval (frequency) thereafter, the CTS require establishing the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test, at a specified frequency based on the reliability and availability of the LCO-

required components. Relaxations of CTS SRs would include extending the frequency of the SRs. These relaxations of CTS SR frequencies optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR frequency relaxations are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis.

~~Type 6~~**Category 8** - Deletion of **Reporting** Requirements ~~Redundant to Regulations or Design Information~~

The CTS contain requirements that are redundant to **reporting** regulations in 10 CFR. The CTS include requirements that a "Reportable Event" is any of those conditions specified in 10 CFR 50.73. However, consistent with the **I**STS, the ITS would omit many of the CTS reporting requirements because the reporting requirements in the regulations cited do not need repeating in the TSs to ensure timely submission to the NRC. Therefore, this ~~type~~**category** of change has no impact on the safe operation of the plant. Deletion of these requirements is beneficial because it reduces the administrative burden on the licensee and in turn allows increased attention to plant operations important to safety. These changes are consistent with the guidance established by the **I**STS in consideration of the ~~DC~~C**NP** current licensing basis and, in view of the above, are acceptable.

~~The CTS contain design information that is deleted in ITS. In conformance with the guidance of the STS, ITS fuel assembly design features are simplified. The ITS would include allowances for changes to core designs if certain conditions are met. The ITS would allow limited substitutions of filler rods for fuel rods if fuel assemblies comply with fuel safety design bases, and the installation of a limited number of untested lead test assemblies in nonlimiting core regions. All fuel assemblies with substitutions must be evaluated in accordance with NRC-approved codes and methods or tested to show they comply with all fuel safety design bases. Lead test assemblies will not challenge any reactor operating limits since, by the requirements of this specification, the substitutions are restricted to nonlimiting core regions. Additionally, core performance is monitored throughout the operating cycle to assure that the plant performs safely. Thus, public health and safety will be adequately protected if the plant is operated in accordance with the provisions of ITS 4.2.1, which implements guidance provided in Generic Letter (GL) 90-02, "Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications," Supplement 1. These changes are consistent with the guidance established by the STS in consideration of the DCC current licensing basis and, in view of the above, are acceptable.~~

Category 9 - Surveillance Frequency Change Using GL 91-04 Guidelines, Non-24 Month Type Change

Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval (frequency) thereafter, the CTS require establishing the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-

required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test, at a specified frequency based on the reliability and availability of the LCO-required components. Relaxations of CTS SRs would include extending the frequency of the SRs. GL 91-04 guidelines ensure that the extension of the SR frequencies are evaluated to ensure the impact on safety for the extension of each SR frequency is small. These relaxations of CTS SR frequencies optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR frequency relaxations are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis.

~~Type 7~~Category 10 - ~~Relaxation of~~18 to 24 Month Surveillance Frequency ~~from 18 months to 24 months~~**Change, Non-Channel Calibration Type**

The CTS require maintaining LCO equipment operable by conducting SRs in accordance with specified SR intervals. The changes of this ~~type~~**category** relate to extending SR **non-channel calibration** test intervals. Improved reactor fuels allow the licensee to consider an increase in the duration of the fuel cycle for the facility. The TSs that specify an 18-month surveillance interval or require surveillance every refueling interval or during shutdown would be changed to specify a 24-month interval. The CTS 4.0.~~A~~**2** (ITS SR 3.0.2) provision to extend surveillances by 25 percent of the specified interval would extend the time limit for completing these surveillances from the CTS limit of 22.5 months to a maximum of 24 months. The NRC staff review of these items is covered in more detail in Section 3.0.G of this SE. These changes are consistent with the guidance established by the **I**STS in consideration of the ~~DC~~C**NP** current licensing basis and, in view of the above, are acceptable.

Category 11 - 18 to 24 Month Surveillance Frequency Change, Channel Calibration Type

The CTS require maintaining LCO equipment operable by conducting SRs in accordance with specified SR intervals. The changes of this category relate to extending SR channel calibration test intervals using the guidance in GL 91-04. Improved reactor fuels allow the licensee to consider an increase in the duration of the fuel cycle for the facility. The TSs that specify an 18-month surveillance interval or require surveillance every refueling interval or during shutdown would be changed to specify a 24-month interval. The CTS 4.0.2 (ITS SR 3.0.2) provision to extend surveillances by 25 percent of the specified interval would extend the time limit for completing these surveillances from the CTS limit of 22.5 months to a maximum of 24 months. The NRC staff review of these items is covered in more detail in Section 3.0.G of this SE. These changes are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis and, in view of the above, are acceptable.

Category 12 - Deletion of Surveillance Requirement Shutdown Performance Requirements

The CTS require maintaining LCO equipment operable by conducting SRs in accordance with specified SR intervals. The changes of this category relate to deleting the requirement to perform certain SRs during shutdown conditions only. The TSs that specify shutdown conditions would be changed to specify a frequency only. The control of the unit conditions appropriate to perform the test is an issue for procedures and scheduling, and has been determined by the NRC Staff to be unnecessary as a Technical Specification restriction. As indicated in Generic Letter 91-04, allowing this control is consistent with the vast majority of other Technical Specification Surveillances that do not dictate unit conditions for the Surveillance. These changes are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis and, in view of the above, are acceptable.

~~Type 8~~Category 13 - ~~Relaxation of CTS 3.0.C Requirements~~Addition of LCO 3.0.4 Exception

~~CTS 3.0.C (ITS LCO 3.0.3) establishes actions that must be implemented when an LCO is not met and either an associated Required Action or Completion Time is not met and no other Condition applies, or the condition of the unit is not specifically addressed by the associated TS Actions. This specification delineates the time limits for placing the unit in a safe Mode or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its Actions. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. Unless otherwise stated, LCO 3.0.3 is always applicable to ITS LCO Actions. However, new Required Actions would be included within the Actions of ITS LCOs that provide guidance for placing the plant in a specified condition or applicable Mode in which the LCO does not apply without requiring entry into LCO 3.0.3 which would require a shutdown to Mode 5. These new remedial actions would require the licensee to place the plant in a safe condition in a controlled manner, thus reducing the likelihood that additional structures, systems, or components will be unavailable to mitigate operational occurrences or plant transients. Therefore, these proposed changes do not impact safe operation of the plant. These changes are consistent with the guidance established by the STS in consideration of the DCC current licensing basis and, in view of the above, are acceptable.~~Based on CNP Unit 1 and Unit 2 License Amendments 281 and 265, respectively, issued June 25, 2004, which revised the existing CTS LCO 3.0.4 requirements in accordance with TSTF-359 Revision 9, the original changes have been deleted, and this Category is no longer necessary.

~~**Type 9 – Relaxation of SR Frequency**~~

~~**Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval thereafter, the CTS require establishing the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test. Relaxations of CTS SRs would include relaxing both the acceptance criteria and the conditions of performance. Also, the ITS would permit the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS-required features cannot distinguish between an "actual" signal and a "test" signal. These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR relaxations are consistent with the guidance established by the STS in consideration of the DCC current licensing basis.**~~

Category 14 - Changing Instrumentation Allowable Values

The CTS require maintaining LCO equipment operable by conducting SRs in accordance with specified SR intervals. The changes of this category relate to changing instrumentation Allowable Values as a result of drift analyses performed for instrumentation where the SR frequency has been extended from 18 months to 24 months. These changes are in accordance with the CNP-specific setpoint methodology, and are consistent with the guidance established by the ISTS in consideration of the CNP current licensing basis and, in view of the above, are acceptable.

For the reasons presented above, these less restrictive changes to the CTS are acceptable because they will not affect the safe operation of the plant. The ITS requirements are consistent with the current licensing basis, operating experience, and plant accident and transient analyses, and provide reasonable assurance that public health and safety will be protected.

Table L lists the less restrictive changes being made in the ~~DC~~C**NP** ITS conversion. Table L, which is organized in **I**STS order by each L-type DOC to the CTS, provides a summary description of the less restrictive change that was made, the CTS and ITS references, and a reference to the specific change type discussed above. The NRC staff reviewed all of the less restrictive changes proposed by the licensee and finds them acceptable because they are compatible with the **I**STS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

D. Removed Details

When requirements have been shown to give little or no safety benefit, their removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a

plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups' comments on **I**STS. The NRC staff reviewed generic relaxations contained in the **I**STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The ~~DC~~C**NP** design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the **I**STS and thus provide a basis for ITS. A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through ~~4~~**6** as described below:

Type 1 - Removing Details of System Design and System Description, Including Design Limits

The design of the facility is required to be described in the U**F**SAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved QA ~~plan~~**Program Description** (~~USAR Appendix C~~**QAPD**). The regulation at 10 CFR 50.59 specifies controls for changing the facility as described in the U**F**SAR. The regulation at 10 CFR 50.54(a) specifies criteria for changing the QA**PD** ~~plan~~. The Technical Requirements Manual (TRM) is a general reference in the U**F**SAR and is subject to administrative controls that include the requirement to perform evaluations for changes made to the TRM consistent with the requirements specified in 10 CFR 50.59. The ITS Bases also contain descriptions of system design. ITS 5.5.12 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the U**F**SAR in accordance with 10 CFR 50.59 or the ITS Bases, as appropriate. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR) in accordance with GL 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," dated October 3, 1988. ITS Section 5.6, "~~Administrative Controls~~**Reporting Requirements**," includes the programmatic requirements for the COLR. Therefore, it is acceptable to remove Type 1 details from the CTS and place them in licensee-controlled documents.

Type 2 - Removing Descriptions of System ~~or Plant~~ Operation

The plans for normal and emergency operation of the facility are required to be described in the U**F**SAR by 10 CFR 50.34. Specifications 5.4.1.a and 5.4.1.e require written procedures to be established, implemented, and maintained for plant operating procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, dated February 1978, and in all programs specified in Specification 5.5, respectfully. The ITS Bases also contain descriptions of system operation. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the U**F**SAR and ITS Bases. ITS 5.5.12 specifies controls for changing the Bases. It is acceptable to remove details of system operation from the TSs because this type of information will be adequately controlled in the U**F**SAR (which references the TRM), in the TS Bases, and in Specification 5.5, "Programs and Manuals," as appropriate. Therefore, it is acceptable to remove Type 2 details from the CTS and place them in licensee-controlled documents.

Type 3 - Removing Procedural Details for Meeting TS Requirements **or Reporting Requirements**

Details for performing TS SRs **or for regulatory reporting** are more appropriately specified in the plant procedures. Prescriptive procedural information in an ITS requirement is unlikely to contain all procedural considerations necessary for the plant operators to comply with TSs **and all regulatory reporting requirements**, and referral to plant procedures is therefore required in any event. Changes to procedural details include those associated with limits retained in the ITS. For example, Specification 5.4.1 requires that written procedures covering activities that include all programs specified in Specification 5.5 be established, implemented, and maintained. The Inservice Testing (IST) Program is required by Specification 5.5.~~7~~**6**. ITS 5.5.~~7~~**6**, "Inservice Testing Program," requires a program to provide controls for IST of American Society of Mechanical **Engineers** (ASME) Code Class 1, 2, and 3 components. The program includes defining testing frequencies specified in ~~**Section XI of**~~ the ASME ~~***Boiler and Pressure Vessel Code***~~**Operation and Maintenance Standards and Codes (OM Codes)**, and applicable addenda. The CTS also contain requirements to test specific components such as pumps and valves, and which establish IST of Quality Group A, B, and C pumps and valves performed in accordance with the requirements for ASME Code Class 1, 2 and 3 components specified in ~~**Section XI of**~~ the applicable ASME ~~***Boiler and Pressure Vessel Code* edition~~**OM Codes** and addenda, subject to the applicable provisions of 10 CFR 50.55a. Therefore, it is acceptable to remove Type 3 details from the CTS and place them in licensee-controlled documents.

Type 4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms

Certain CTS requirements are for instruments and alarms that are not required for operability of the LCO-required equipment, and thus are relocated to the UFSAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TSs. Changes to the facility or to procedures as described in the UFSAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QAPD, and ITS 5.5.12 governs changes to the ITS Bases. Therefore, it is acceptable to remove Type 4 details from CTS and place them in licensee-controlled documents.

Type 5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the Core Operating Limits Report

Certain CTS requirements contain cycle-specific parameter limits that are redundantly specified in the Core Operating Limits Report (COLR), and thus are relocated to the licensee-controlled COLR. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TSs. Changes are made

to the COLR in accordance with the provisions of ITS 5.6.5. Therefore, it is acceptable to remove Type 5 details from CTS and place them in licensee-controlled documents.

Type ~~4~~**6**- ~~Relocated Redundant~~**Removal of LCO, SR, or other TS** Requirement~~s~~ **to the TRM, UFSAR, ODCM, QAPD, or IIP**

Certain CTS administrative requirements are redundant to regulations and thus are relocated to the U**F**SAR or other appropriate licensee-controlled documents**, including the TRM, Offsite Dose Calculation Manual (ODCM), QAPD, or Inservice Inspection Plan (IIP)**. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TSs. Changes to the facility or to procedures as described in the U**F**SAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QA**PD** ~~Plan~~, and ITS 5.5.12 governs changes to the ITS Bases. Therefore, it is acceptable to remove Type ~~4~~**6** details from CTS and place them in licensee-controlled documents.

Table L~~R~~**A** lists the less restrictive removal of detail changes being made in the ~~DC~~C**NP** ITS conversion. Table L~~R~~**A** is organized in **I**STS order by each L~~R~~**A-**type DOC and includes the following:

(1) the **ITS/CTS no. and** DOC identifiers **(e.g., 3.4 LA.4)**, formatted as **ITS/CTS Chapter/Section number (e.g., 3.4), followed by** DOC Type (e.g., L~~R~~**A**)~~, followed by the Chapter/Section number (e.g., 3.4),~~ followed by a designator number (e.g., ~~7~~4) **(ITS/CTS No. and DOC No.)**;

(2) the reference numbers of the associated CTS requirements (CTS Requirement);

(~~2~~**3**) a summary description of the relocated details and requirements **(Description of Relocated Requirement)**;

(~~3~~**4**) the name of the licensee-controlled document to contain the relocated details and requirements (~~l~~**L**ocation);

(~~4~~**5**) the regulation (or ITS Specification) for controlling future changes to relocated requirements (~~c~~**C**hange ~~c~~**C**ontrol ~~p~~**P**rocess);

~~(5) the reference numbers of the associated CTS requirements;~~ and

(6) a characterization of the type of change **(Change Type)**.

The NRC staff has concluded that these types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of the ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- Bases controlled in accordance with ITS 5.5.12, “Technical Specifications (TS) Bases Control Program.”
- U**F**SAR (which references the TRM) controlled by 10 CFR 50.59.

- Programmatic documents required by ITS Section 5.5 and controlled by ITS Section 5.4.
- Inservice Inspection (ISI) and IST Programs controlled by 10 CFR 50.55a.
- ~~Offsite Dose Calculation Manual (~~ODCM~~)~~ controlled by ITS 5.5.1.
- COLR controlled by ITS 5.6.5.
- QA**PD** ~~Plan~~, as approved by the NRC, referenced in the U**F**SAR, and controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- Site Emergency Plan controlled by 10 CFR 50.54(q).

To the extent that information has been relocated to licensee-controlled documents, such information is not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria set forth in 10 CFR 50.36(c)(2)(ii) and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Specifications

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36(c)(2)(ii)) may be relocated from existing TSs (an NRC-controlled document) to appropriate licensee-controlled documents as noted in Section D above. This section discusses the relocation of entire specifications from the CTS to licensee-controlled documents. These specifications generally would include LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and supplements, the licensee proposed relocating such specifications from the CTS to a licensee-controlled document (i.e., TRM), as appropriate. The NRC staff has reviewed the licensee's submittals and finds that relocation of these requirements to a licensee-controlled document is acceptable in that the LCOs and associated requirements were found not to fall within the scope of 10 CFR 50.36(c)(2)(ii) and changes to licensee-controlled documents will be adequately controlled by 10 CFR 50.59, as applicable. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists the relocated changes that would be made in the ~~DC~~C**NP** ITS conversion and lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R includes:

(1) references to the DOCs;
(2) references to the relocated CTS requirements;
(3) summary descriptions of the relocated CTS requirements;
(4) names of the documents that will contain the relocated specifications (i.e., the new location); and
(5) the methods for controlling future changes to the relocated specifications (i.e., the regulatory control process).

The NRC staff's evaluation of each relocated specification listed in Table R is provided below, mostly in CTS order. New locations for relocated CTS are listed in Table R.

E.1 ITS 3/4.1.2.1, R.1

CTS 3/4.1.2.1 provides requirements on the boration systems flow paths during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.1 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Flow Paths - Shutdown Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Flow Paths - Shutdown Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Flow Paths - Shutdown Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-6) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a non- significant risk contributor to core damage frequency (CDF) and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Flow Paths - Shutdown Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Flow Paths - Shutdown LCO and Surveillances may be relocated out of the TSs. The Flow Paths - Shutdown Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.2 ITS 3/4.1.2.2, R.1

CTS 3/4.1.2.2 provides requirements on the boration systems flow paths during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.2 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Flow Paths - Operating Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Flow Paths - Operating Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Flow Paths - Operating Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-8) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a non- significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Flow Paths - Operating Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Flow Paths - Operating LCO and Surveillances may be relocated out of the TSs. The Flow Paths - Operating Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.3 ITS 3/4.1.2.3, R.1

CTS 3/4.1.2.3 provides requirements on the charging pumps during shutdown when used as part of the boration system. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM. It should be Noted that this Specification also has requirements concerning the maximum number of charging and safety injection pumps that can be OPERABLE. This Discussion of Change does not address these requirements; they are covered in ITS 3.4.12. It should also be Noted that this Specification has requirements associated with the safe shutdown requirements of 10 CFR 50 Appendix R. These requirements are discussed in DOC L.1.

This change is acceptable because CTS 3/4.1.2.3 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Charging Pumps - Shutdown Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Charging Pumps - Shutdown Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Charging Pumps - Shutdown Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-6) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a nonsignificant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Charging Pumps - Shutdown Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Charging Pumps - Shutdown LCO and Surveillances may be relocated out of the TSs. The Charging Pumps - Shutdown Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii)

and has been relocated to the TRM.~~m generator pressure/temperature (P/T) limits would be relocated to the PTLR. The shutdown requirements associated with the steam generator P/T limits would be relocated to the TRM. The CTS require that the secondary side of the steam generator not be pressurized above 200 psig if the temperature of the steam generator is below 70 degrees Fahrenheit. This operating restriction does not present a challenge to the integrity of a fission product barrier and these limits are not required for safe operation of the facility. Credit for the steam generator P/T limits is not assumed in accident analyses. Therefore, steam generator limits are not operational limits that are an initial assumption of any DBA or transient analysis, and may be relocated to the PTLR.~~

E.4 ITS 3/4.1.2.4, R.1

CTS 3/4.1.2.4 provides requirements on the charging pumps during operation when used as part of the boration system. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.4 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Charging Pumps - Operating Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Charging Pumps - Operating Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Charging Pumps - Operating Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-8) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a non- significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Charging Pumps - Operating Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Charging Pumps - Operating LCO and Surveillances may be relocated out of the TSs. The Charging Pumps - Operating Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.5 ITS 3/4.1.2.5, R.1

CTS 3/4.1.2.5 provides requirements on the boric acid transfer pumps during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.5 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Boric Acid Transfer Pumps - Shutdown Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Boric Acid Transfer Pumps - Shutdown Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Boric Acid Transfer Pumps - Shutdown Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-6) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a non- significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Boric Acid Transfer Pumps - Shutdown Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Boric Acid Transfer Pumps - Shutdown LCO and Surveillances may be relocated out of the TSs. The Boric Acid Transfer Pumps - Shutdown Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.6 ITS 3/4.1.2.6, R.1

CTS 3/4.1.2.6 provides requirements on the boric acid transfer pumps during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.6 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Boric Acid Transfer Pumps - Operating Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Boric Acid Transfer Pumps - Operating Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Boric Acid Transfer Pumps - Operating Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-8) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a non- significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Boric Acid Transfer Pumps - Operating Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Boric Acid Transfer Pumps - Operating LCO and Surveillances may be relocated out of the TSs. The Boric

Acid Transfer Pumps - Operating Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.7 ITS 3/4.1.2.7, R.1

CTS 3/4.1.2.7 provides requirements on the borated water sources during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.7 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Borated Water Sources - Shutdown Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Borated Water Sources - Shutdown Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Borated Water Sources - Shutdown Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-10) and summarized in Table 1 of WCAP-11618, the loss of the CVCS System was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2, and concurs with the assessment. The Borated Water Sources - Shutdown Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Borated Water Sources - Shutdown LCO and Surveillances may be relocated out of the TSs. The Borated Water Sources - Shutdown Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is

designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.8 ITS 3/4.1.2.8, R.1

CTS 3/4.1.2.8 provides requirements on the borated water sources during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.1.2.8 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The CVCS is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Borated Water Sources - Operations/Operating Specification does not satisfy criterion 1.

2. The CVCS is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Borated Water Sources - Operations/Operating Specification does not satisfy criterion 2.

3. The CVCS is not part of a primary success path in the mitigation of a DBA or transient. The Borated Water Sources - Operations/Operating Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-10) and summarized in Table 1 of WCAP-11618, the loss of the CVCS was found to be a nonsignificant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Borated Water Sources - Operations/Operating Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Borated Water Sources - Operations/Operating LCO and Surveillances may be relocated out of the TSs. The Borated Water Sources - Operations/Operating Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.9 ITS 3.3.3, R.1

Unit 1 CTS Tables 3.3-11 and 4.3-7 and Unit 2 CTS Tables 3.3-10 and 4.3-10 provide requirements for Post-Accident Monitoring Instrumentation channels. Each individual post accident monitoring parameter has a specific purpose, however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant.

The NRC position on application of the screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 9, 1988 from T.E. Murley (NRC) to W.S. Wilgus (B&W Owners Group). The screening criteria are now incorporated into 10 CFR 50.36(c)(2)(ii). The NRC position taken was that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments. Accordingly, this position has been applied to the ~~DC~~C**NP** Units 1 and 2 Regulatory Guide 1.97 instruments. Those instruments meeting these criteria have remained in TSs. The instruments not meeting this criteria will be relocated from the TSs to the TRM.

A review of the ~~DC~~C**NP** Units 1 and 2 UFSAR and the NRC Regulatory Guide 1.97 Safety Evaluation for ~~DC~~C**NP** Units 1 and 2 shows that the following Unit 1 CTS Tables 3.3-11 and 4.3-7 and Unit 2 CTS Tables 3.3-10 and 4.3-10 Instruments do not meet Category 1 or Type A requirements.

Instrument 9 Boric Acid Tank Solution Level
Instrument 12 PORV Position Indicator - Limit Switches
Instrument 13 PORV Block Valve Position Indicator - Limit Switches
Instrument 14 Safety Valve Position Indicator - Acoustic Monitor
Instrument 17 Containment Sump Level

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. These instruments are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a design basis accident (DBA). These instruments do not meet criterion 1.

2. The monitored parameters are not process variables, design features, or operating restrictions that are initial conditions of a DBA or transient. These instruments do not meet criterion 2.

3. These instruments are not part of a primary success path in the mitigation of a DBA or transient. These instruments do not meet criterion 3.

4. These instruments are not structures, systems, or components which operating experience or probabilistic risk assessment has shown to be significant to public health

and safety. As discussed in Section 4.0 (Appendix A, page A-25) and summarized in Table 1 of WCAP-11618, the loss of the above listed instruments were found to be non-significant risk contributors to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. These instruments do not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met for instruments which do not meet Regulatory Guide 1.97 Type A variable requirements or non-Type A, Category 1, variable requirements, their associated LCO and Surveillances may be relocated out of the TSs. The TS requirements for these instruments will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the LCO requirements for these instruments did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and have been relocated to the TRM.

E.10 <u>ITS 3/4.3.3.2, R.1</u>

CTS 3/4.3.3.2 ensures the OPERABILITY of movable incore detector instrumentation when required to monitor the flux distribution within the core. The instrumentation is used for periodic Surveillance of the reactor core power distribution, and calibration of the excore neutron flux detectors, but is not assumed in any design basis accident (DBA) analysis and does not mitigate an accident. This Specification does not meet the criteria for retention in the Improved TSs (ITS); therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.3.3.2 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. The movable incore detectors are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Movable Incore Detectors Specification does not satisfy criterion 1.

2. The movable incore detectors are not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Movable Incore Detectors Specification does not satisfy criterion 2.

3. The movable incore detectors are not part of a primary success path in the mitigation of a DBA or transient. The Movable Incore Detectors Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-12) and summarized in Table 1 of WCAP-11618, the loss of movable incore detectors was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Movable Incore Detectors Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Movable Incore Detectors LCO and Surveillances may be relocated out of the TSs. The Movable Incore Detectors Specification will be relocated to the TRM. Changes to the TRM will be

controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.11 ITS 3/4.3.3.3, R.1

CTS 3/4.3.3.3 provides requirements for seismic instrumentation. In the event of an earthquake, seismic instrumentation is required to permit comparison of the measured response to that used in the design basis of the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR 100. Since this is determined after the event has occurred, it has no bearing on the mitigation of any design basis accident (DBA). This Specification does not meet the criteria for retention in the Improved TSs (ITS); therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.3.3.3 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. Seismic instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Seismic Instrumentation Specification does not satisfy criterion 1.

2. Seismic instrumentation is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Seismic Instrumentation Specification does not satisfy criterion 2.

3. Seismic instrumentation is not part of a primary success path in the mitigation of a DBA or transient. The Seismic Instrumentation Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-22), and summarized in Table 1 of WCAP-11618, the loss of seismic instrumentation was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2, and concurs with the assessment. The Seismic Instrumentation Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Seismic Instrumentation LCO and Surveillances may be relocated out of the TSs. The Seismic Instrumentation Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.12 ITS 3/4.3.3.4, R.1

CTS 3/4.3.3.4 provides requirements for meteorological instrumentation. Meteorological instrumentation is used to measure environmental parameters that may affect distribution of fission products and gases following a design basis accident (DBA), but it is not an input assumption for any DBA analysis and does not mitigate the accident.

Meteorological information is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This Specification does not meet the criteria for retention in the Improved TSs (ITS); therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.3.3.4 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. Meteorological instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Meteorological Instrumentation Specification does not satisfy criterion 1.

2. Meteorological instrumentation is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Meteorological Instrumentation Specification does not satisfy criterion 2.

3. Meteorological instrumentation is not part of a primary success path in the mitigation of a DBA or transient. The Meteorological Instrumentation Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-23), and summarized in Table 1 of WCAP-11618, the loss of meteorological monitoring instrumentation was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2, and concurs with the assessment. The Meteorological Instrumentation Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, Meteorological Instrumentation LCO and Surveillances may be relocated out of the TSs. The Meteorological Instrumentation Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.13 ITS 3/4.3.3.5.1, DOC

CTS 3/4.3.3.5.1 provides requirements for Appendix R remote shutdown instrumentation. The Appendix R remote shutdown instrumentation is used to ensure that a fire will not preclude achieving safe shutdown. This instrumentation is independent of areas where a fire could damage systems normally used to shutdown the reactor. However, the instrumentation is not used to detect a degradation of the reactor coolant pressure boundary, and is not assumed to mitigate a design basis accident (DBA) or transient event. The Appendix R remote shutdown instrumentation capability is consistent with the requirements of 10 CFR 50, Appendix R. The acceptability of the relocation of the Appendix R TS requirements from the plant TSs has already been endorsed by the NRC as indicated in Generic Letter 86-10. This Specification does not

meet the criteria for retention in the Improved TSs (ITS); therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.3.3.5.1 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. Appendix R remote shutdown instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Appendix R Remote Shutdown Instrumentation Specification does not satisfy criterion 1.

2. Appendix R remote shutdown instrumentation is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The Appendix R Remote Shutdown Instrumentation Specification does not satisfy criterion 2.

3. Appendix R remote shutdown instrumentation is not part of a primary success path in the mitigation of a DBA or transient. The Appendix R Remote Shutdown Instrumentation Specification does not satisfy criterion 3.

4. Although the Appendix R remote shutdown instrumentation has not been specifically evaluated for risk significance either generically or on a plant specific basis, insight based on a review of ~~DC~~C**NP** Units 1 and 2 licensing basis documentation (including the ~~DC~~C**NP** Probabilistic Risk Assessment Final Report) indicates that the instrumentation is not risk dominant with regards to CDF or off-site health effects. The Appendix R Remote Shutdown Instrumentation Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, Appendix R Remote Shutdown Instrumentation LCO and Surveillances may be relocated out of the TSs. The Appendix R Remote Shutdown Instrumentation Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.14 <u>ITS 3/4.3.3.9, R.1</u>

CTS 3/4.3.3.9 provides requirements for explosive gas monitoring instrumentation. The Explosive Gas Monitoring Instrumentation Specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the gaseous waste processing system is adequately monitored, which will help ensure that the concentration is maintained below the flammability limit. However, the system is designed to contain detonations, and detonations would not affect the function of any safety related equipment. The concentration of oxygen in the gaseous Waste Processing System is not an initial assumption of any design basis accident (DBA) or transient analysis. This Specification does not meet the criteria for retention in the Improved TSs (ITS); therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.3.3.9 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. Explosive gas monitoring instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The Explosive Gas Monitoring Instrumentation Specification does not satisfy criterion 1.

2. Explosive gas monitoring instrumentation is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. In addition, excessive system oxygen is not an indication of a DBA or transient. The Explosive Gas Monitoring Instrumentation Specification does not satisfy criterion 2.

3. Explosive gas monitoring instrumentation is not part of a primary success path in the mitigation of a DBA or transient. In addition, excessive oxygen discharge is not part of a primary success path in mitigating a DBA or transient. The Explosive Gas Monitoring Instrumentation Specification does not satisfy criterion 3.

4. As discussed in Section 4.0 (Appendix A, page A-69) and summarized in Table 1 of WCAP-11618, the loss of the explosive gas monitoring instrumentation was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2, and concurs with the assessment. The Explosive Gas Monitoring Instrumentation Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, Explosive Gas Monitoring Instrumentation LCO and Surveillances may be relocated out of the TSs. The Explosive Gas Monitoring Instrumentation Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.15 CTS 3/4.4.7, R.1

CTS 3/4.4.7 provides limits on the oxygen, chloride and fluoride content in the RCS. Poor coolant water chemistry contributes to the long term degradation of system materials of construction, and thus is not of immediate importance to the unit operator. Reactor coolant water chemistry is monitored for a variety of reasons. One reason is to reduce the possibility of failures in the Reactor Coolant System pressure boundary caused by corrosion. However, the chemistry monitoring activity is of a long term preventative purpose rather than mitigative. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.4.7 does not meet the 10 CFR 50.92(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is the following~~:

1. The RCS chemistry limits are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The RCS Chemistry Specification does not satisfy criterion 1.

2. The RCS chemistry limits are not a process variable that is an initial condition of a DBA or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The RCS Chemistry Specification does not satisfy criterion 2.

3. The RCS chemistry limits are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The RCS Chemistry Specification does not satisfy criterion 3.

4. The RCS chemistry limits are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-40) and summarized in Table 1 of WCAP-11618, the RCS chemistry limits were found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2, and concurs with this assessment. The RCS Chemistry Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the RCS Chemistry LCO and associated Surveillances may be relocated out of the TSs. The RCS Chemistry Specification will be relocated to the TRM.

Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the LCO did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.16 <u>CTS 3/4.4.9.2, R.1</u>

CTS 3/4.4.9.2 states that the pressurizer temperature shall be limited to a maximum heatup of 100°F or cooldown of 200°F in any one hour period and a maximum spray water temperature differential of 320°F. The limits meet the requirements given in the ASME Code, Section III, Appendix G. These limitations are consistent with structural analysis results. However, these limits are not initial condition assumptions of a DBA or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Statement the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in TSs. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.4.9.2 does not meet the 10 CFR 50.92(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is the following~~:

1. The pressurizer temperature limits are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Pressurizer Specification does not satisfy criterion 1.

2. The pressurizer temperature limits are not a process variable that is an initial condition of a DBA or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Pressurizer Specification does not satisfy criterion 2.

3. The pressurizer temperature limits are not a structure, system or component that is part of the primary success path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Pressurizer Specification does not satisfy criterion 3.

4. The pressurizer temperature limits are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-41) and summarized in Table 1 of WCAP-11618, the pressurizer temperature limits were found to be a nonsignificant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with this assessment. The Pressurizer Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Pressurizer LCO and associated Surveillances may be relocated out of the TSs. The Pressurizer Specification will be relocated to the TRM.

Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.17 <u>CTS 3/4.4.10.1, R.1</u>

~~**CTS LCO 3.4.2 and CTS LCO 3.4.3 are modified by a note that states that the pressurizer lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. This information is not provided in ITS 3.4.10. This changes the CTS by moving this information to the Bases.**~~

~~**The removal of these details for performing Surveillance Requirements from the TSs is acceptable because this type of information is not necessary to be included in the TSs to provide adequate protection of public health and safety. ITS 3.4.10**~~

~~still retains a requirement for the valves to be OPERABLE. Under the definition of OPERABILITY, the safety valves must be capable of lifting at the assumed conditions, which includes the ambient operating conditions of the safety valves themselves. Also, this change is acceptable because these types of procedural details will be adequately controlled in the ITS Bases. Changes to the Bases are controlled by the TS Bases Control Program in ITS Chapter 5. This program provides for the evaluation of changes to ensure the Bases are properly controlled. This change is designated as a less restrictive removal of detail change because procedural details for meeting TS requirements are being moved from the CTS to the ITS Bases.~~

CTS 3/4.4.10.1 provides requirements for the ASME Code Class 1, 2 and 3 components to ensure their structural integrity. The inspection programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity of these components will be maintained throughout the life of the components. ASME Code Class 1, 2, and 3 components are monitored so that the possibility of component structural failure does not degrade the safety function of the system. The monitoring activity is of a preventive nature rather than a mitigative action. Other Technical Specifications require important systems to be OPERABLE (for example, Emergency Core Cooling Systems) and in a ready state for mitigative action. This Technical Specification is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. Hence, it is not necessary to retain this Specification to ensure immediate OPERABILITY of safety systems. Further, this Technical Specification prescribes inspection requirements that are performed during plant shutdown. It is, therefore, not directly important for responding to design basis accidents. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.4.10.1 does not meet the 10 CFR 50.92(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. **The inspections stipulated by this Specification are not installed instrumentation used for detecting, and indicating in the control room, a significant abnormal degradation of the reactor coolant pressure boundary during operations prior to a DBA. The ASME Code Class 1, 2 and 3 Components Specification does not satisfy criterion 1.**

2. **The inspections stipulated by this Specification are not a process variable, design feature, or operating restriction that is an initial assumption in a DBA or transient. The ASME Code Class 1, 2 and 3 Components Specification does not satisfy criterion 2.**

3. **The ASME Code Class 1, 2 and 3 Components inspected per this Specification are assumed to function to mitigate a DBA. Their capability to perform this function is addressed by other Technical Specifications.**

This Technical Specification only specifies inspection requirements for these components, and these inspections can only be performed when the plant is shutdown. Therefore, criterion 3 is not satisfied.

4. The ASME Code Class 1, 2 and 3 Components are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-43) and summarized in Table 1 of WCAP-11618, the assurance of OPERABILITY of the entire system as verified in the system OPERABILITY Specification dominates the risk contribution of the system. The lack of a long term assurance of structural integrity as stipulated by this Specification was found to be a non-significant risk contributor to core damage frequency and offsite releases. The licensee has reviewed this evaluation, considers it applicable to CNP Units 1 and 2, and concurs with this assessment. The ASME Code Class 1, 2 and 3 Components Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the ASME Code Class 1, 2 and 3 Components LCO and associated Surveillances may be relocated out of the Technical Specifications. The ASME Code Class 1, 2 and 3 Components Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. In addition, Surveillances, except for the reactor coolant pump (RCP) flywheel inspection, are already required by regulations in 10 CFR 50.55a to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda. The RCP flywheel inspection requirement is not covered by other regulatory requirements and is needed for safe operation of the plant; therefore, this requirement will be maintained in the CNP Units 1 and 2 ITS. Chapter 5.0 of the CNP Units 1 and 2 ITS will contain a section which provides a programmatic approach to the requirements relating to the structural integrity of ASME Code Class 1, 2, and 3 components. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.18 <u>CTS 3/4.4.12.1, R.1</u>

CTS 3/4.4.12.1 provides requirements for the reactor vessel head vents. The reactor vessel head vents are provided to exhaust noncondensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a loss-of-coolant accident (LOCA). Their function, capabilities, and testing requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however, the operation of reactor vessel head vents is not part of the primary success path. The operation of these vents is an operator action after the event has occurred, and is only required when there is indication that natural circulation is not occurring. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.4.12.1 does not meet the 10 CFR 50.92(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is the following~~:

1. The reactor vessel head vents are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Reactor Vessel Head Vents Specification does not satisfy criterion 1.

2. The reactor vessel head vents are not a process variable that is an initial condition of a DBA or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Reactor Vessel Head Vents Specification does not satisfy criterion 2.

3. The reactor vessel head vents are not a structure, system or component that is part of the primary success path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Reactor Vessel Head Vents Specification does not satisfy criterion 3.

4. The reactor vessel head vents are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-44) and summarized in Table 1 of WCAP-11618, the reactor vessel head vents were found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with this assessment. The Reactor Vessel Head Vents Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Reactor Vessel Head Vents LCO and associated Surveillances may be relocated out of the TSs. The Reactor Vessel Head Vents Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.19 <u>CTS 3/4.4.12.2, R.1</u>

CTS 3/4.4.12.2 provides requirements for the pressurizer steam space vents. The pressurizer steam space vents are provided to exhaust noncondensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a loss-of-coolant accident (LOCA). Their function, capabilities, and testing requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however, the operation of pressurizer steam space vents is not part of the primary success path. The operation of these vents is an operator action after the event has occurred, and is only required when there is indication that natural

circulation is not occurring. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.4.12.2 does not meet the 10 CFR 50.92(c)(2)(ii) criteria for inclusion into the ITS. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is the following:

1. The pressurizer steam space vents are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Pressurizer Steam Space Vents Specification does not satisfy criterion 1.

2. The pressurizer steam space vents are not a process variable that is an initial condition of a DBA or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Pressurizer Steam Space Vents Specification does not satisfy criterion 2.

3. The pressurizer steam space vents are not a structure, system, or component that is part of a primary success path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Pressurizer Steam Space Vents Specification does not satisfy criterion 3.

4. The pressurizer steam space vents are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0 (Appendix A, page A-44) and summarized in Table 1 of WCAP-11618, the pressurizer steam space vents were found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Pressurizer Steam Space Vents Specification does not satisfy criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Pressurizer Steam Space Vents LCO and associated Surveillances may be relocated out of the TSs. The Pressurizer Steam Space Vents Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.20 <u>CTS 3/4.6.5.2, R.1</u>

CTS 3/4.6.5.2 provides requirements on the Ice Bed Temperature Monitoring System. The Ice Bed Temperature Monitoring System monitors the temperature of the ice bed to ensure that the ice bed temperature does not increase above the required limits undetected. However, the Ice Bed Temperature Monitoring System is not required to ensure the ice bed temperature is maintained within limits. Another TS (that is being retained) will continue to ensure that temperature is maintained within the required limits. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.6.5.~~4~~**2** does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is as follows~~:

1. The Ice Bed Temperature Monitoring System is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Ice Bed Temperature Monitoring System Specification does not satisfy criterion 1.

2. The Ice Bed Temperature Monitoring System is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Ice Bed Temperature Monitoring System Specification does not satisfy criterion 2.

3. The Ice Bed Temperature Monitoring System is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Ice Bed Temperature Monitoring System Specification does not satisfy criterion 3.

4. The Ice Bed Temperature Monitoring System is not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0 (Appendix A, page A-78) and summarized in Table 1 of WCAP-11618, the Ice Bed Temperature Monitoring System was found to be non-significant risk contributors to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with the assessment. The Ice Bed Temperature Monitoring System is not important for any scenarios modeled in the ~~DC~~C**NP** site-specific PRAs. The Ice Bed Temperature Monitoring System Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Ice Bed Temperature Monitoring System LCO and associated Surveillances may be relocated out of the TSs. The Ice Bed Temperature Monitoring System Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.21 CTS 3/4.6.5.4, R.1

CTS 3/4.6.5.4 provides requirements on the Inlet Door Position Monitoring System. The Inlet Door Position Monitoring System monitors the position of the ice bed inlet doors during normal operation to ensure that the ice bed inlet doors do not open (which could allow the ice bed temperature to increase above the required limits). However, the Inlet Door Position Monitoring System is not required to ensure the inlet doors remain closed and ice bed temperature is maintained within

limits. Other Technical Specifications (that are being retained) will continue to ensure that the inlet doors remain closed and temperature is maintained within the required limits. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3/4.6.5.4 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

10 CFR 50.36(c)(2)(ii) Criteria Evaluation:

1. **The Inlet Door Position Monitoring System is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Inlet Door Position Monitoring System Specification does not satisfy criterion 1.**

2. **The Inlet Door Position Monitoring System is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Inlet Door Position Monitoring System Specification does not satisfy criterion 2.**

3. **The Inlet Door Position Monitoring System is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Inlet Door Position Monitoring System Specification does not satisfy criterion 3.**

4. **The Inlet Door Position Monitoring System is not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0 (Appendix A, page A-78) and summarized in Table 1 of WCAP-11618, the Inlet Door Position Monitoring System was found to be non-significant risk contributors to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to CNP Units 1 and 2, and concurs with the assessment. The Inlet Door Position Monitoring System is not important for any scenarios modeled in the CNP site-specific PRAs. The Inlet Door Position Monitoring System Specification does not meet criterion 4.**

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Inlet Door Position Monitoring System LCO and associated Surveillances may be relocated out of the TSs. The Inlet Door Position Monitoring System Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the Specification did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.2~~1~~2 CTS 3/4.7.2, R.1

CTS 3.7.2.1 states that the temperature of both the primary and secondary coolants in the steam generators shall be greater than 70°F when the pressure of either coolant in the steam generator is greater than 200 psig. The limitation on steam generator pressures and temperatures ensures that pressure-induced stresses on the steam generators do not exceed the maximum allowable fracture toughness limits. These pressure and temperature limits are based on maintaining a steam generator RTNDT sufficient to prevent brittle fracture. As such, the TS places limits on variables consistent with structural analysis results. However, these limits are not initial condition assumptions of a design basis accident (DBA) or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Statement the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in TSs. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3.7.2.1 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is as follows~~:

1. The Steam Generator Pressure/Temperature Limitation is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Steam Generator Pressure/Temperature Limitation Specification does not meet criterion 1.

2. The Steam Generator Pressure/Temperature Limitation is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Steam Generator Pressure/Temperature Limitation Specification does not meet criterion 2.

3. The Steam Generator Pressure/Temperature Limitation is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Steam Generator Pressure/Temperature Limitation Specification does not meet criterion 3.

4. The Steam Generator Pressure/Temperature Limitation is not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-55) and summarized in Table 1 of WCAP-11618, the Steam Generator Pressure/Temperature Limitation was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~CNP Units 1 and 2,

and concurs with this assessment. The Steam Generator Pressure/Temperature Limitation Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Steam Generator Pressure/Temperature Limitation LCO and associated Surveillances may be relocated out of the TSs. The Steam Generator Pressure/Temperature Limitation Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the LCO did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.2~~2~~3 CTS 3/4.7.7 (Unit 1) and 3/4.7.8 (Unit 2) , R.1

CTS 3.7.7.1 (Unit 1) and CTS 3.7.8.1 (Unit 2) state that each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting materials or 5 microcuries of alpha emitting material, shall be free of greater than or equal to 0.005 microcuries of removable contamination. The limitations on sealed source contamination are intended to ensure that the total body and individual organ irradiation doses do not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limitation of ≤ 0.005 microcuries of removable contamination on each sealed source. This requirement and the associated Surveillance Requirements bear no relation to the conditions or limitations that are necessary to ensure safe reactor operation. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

This change is acceptable because CTS 3.7.7.1 (Unit 1) and CTS 3.7.8.1 (Unit 2) do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITS.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is as follows~~:

1. Sealed Source Contamination is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Sealed Source Contamination Specification does not meet criterion 1.

2. Sealed Source Contamination is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Sealed Source Contamination Specification does not meet criterion 2.

3. Sealed Source Contamination is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Sealed Source Contamination Specification does not meet criterion 3.

4. Sealed Source Contamination is not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page

A-59) and summarized in Table 1 of WCAP-11618, the Sealed Source Contamination was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with this assessment. The Sealed Source Contamination Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the Sealed Source Contamination LCO and associated Surveillances may be relocated out of the TSs. The Sealed Source Contamination Specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as relocation because the LCO did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

E.2~~3~~**4** CTS 3/4.9.5, R.1

CTS 3.9.5 states that direct communications shall be maintained between the control room and personnel at the refueling station during CORE ALTERATIONS. This ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS. The prompt notification of the control room of a fuel handling accident is not an assumption in the fuel handling accident analysis. While notification is necessary to ensure that the control room is isolated to meet the control room operator dose limits in General Design Criteria 19, the fuel handling accident analysis does not take credit for direct communications between the refueling station and the control room (30 minutes is assumed before control room operator actions are taken). This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the TRM.

~~The~~ 10 CFR 50.36(c)(2)(ii) Criteria Evaluation ~~is as follows~~:

1. Communications are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Communications Specification does not satisfy criterion 1.

2. Communications are not a process variable, design feature, or operating restriction that is an initial condition of a DBA or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Communications Specification does not satisfy criterion 2.

3. Communications are part of the primary success path and are assumed in the mitigation of a DBA which assumes the failure of a fission product barrier. However, communications are not a structure, system or component. The Communications Specification does not satisfy criterion 3.

4. Communications are not a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. As discussed in Section 4.0, (Appendix A, page A-67) and Table 1 of WCAP-11618, communications was found to be a non-significant risk contributor to CDF and offsite releases. The licensee has reviewed this

evaluation, considers it applicable to ~~DC~~C**NP** Units 1 and 2, and concurs with this assessment. The Communications Specification does not meet criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the communications LCO and associated Surveillances may be relocated out of the TSs. The communications specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. This change is designated as a relocation because the LCO did not meet the criteria in 10 CFR 50.36(c)(2)(ii) and has been relocated to the TRM.

The specifications relocated from the CTS discussed above are not required to be in the TSs because they do not fall within the criteria for mandatory inclusion in the TSs as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff has concluded that appropriate controls have been established for all of the current specifications and information that are being moved to the TRM~~, ODCM, or ISI or IST Programs~~. These relocations are the subject of a new license condition discussed in Section 5.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59 and 10 CFR 50.55a. Accordingly, the specifications and information, as described in detail in this SE, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's submittals.

F. Control of Specifications, Requirements, and Information Relocated from the CTS

In the ITS conversion, the licensee proposes to relocate specifications, requirements, and detailed information from the CTS to licensee-controlled documents. This is discussed in Sections 3.0.D and 3.0.E above. The facility and procedures described in the U**F**SAR and TRM can be revised only in accordance with the provisions of 10 CFR 50.59, which ensure that records are maintained, and establish appropriate control over requirements removed from the CTS and future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. For example, the ODCM can be changed only in accordance with ITS 5.5.1, and the administrative instructions that implement the QA**PD** ~~Plan~~ can be changed only in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the QA**PD** ~~Plan~~ and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, will address the implementation of the ITS conversion and the schedule for the relocation of the CTS requirements into licensee-controlled documents.

G. Evaluation of Other TS Changes (Beyond-Scope ~~Changes~~**Issues**) Included in the Application for Conversion to ITS

This section evaluates other TS changes included in the licensee's ITS application. These include items that deviate from both the CTS and the **I**STS, do not fall clearly into a category, or are in addition to those changes that are needed to meet the overall purpose of the conversion. These changes are termed beyond-scope issues (BSIs), which have been identified by the licensee in its ITS application, and by the NRC staff during the course of its review. These BSIs were included in the Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for a Hearing published in the *Federal Register* on ~~June 25, 2002~~**September 29, 2004** (6~~7~~**9** FR ~~42808~~**58205**).

G.1 BSI Changes Identified by the Licensee:

The changes discussed below are licensee-identified BSIs and are listed in the order of the applicable ITS specification or section, as appropriate. Also provided are references to the associated DOC to the CTS and JFD from the **I**STS given in the licensee's application.

G.1.1 Revision of Surveillance test intervals for channel calibration

G.1.1.a ITS 3.3.1, DOC M.16

CTS Table 4.3-1, Functional Unit 16 (Undervoltage - Reactor Coolant Pumps (RCPs)) requires the performance of a CHANNEL CALIBRATION every 18 months. **I**STS Table 3.3.1-1 Function 12 (Undervoltage RCPs) requires the performance of CHANNEL CALIBRATION every [18] months (**I**STS SR 3.3.1.10). ITS Table 3.3.1-1 Function 12 (Undervoltage RCPs) requires the performance of CHANNEL CALIBRATION every 184 days (ITS SR 3.3.1.12). This changes the CTS and **I**STS by changing the Surveillance Frequencies from 18 months to 184 days.

The purpose of the CHANNEL CALIBRATION is to ensure the Undervoltage - Reactor Coolant Pumps channels will function as designed during an analyzed event. Changing the SR Frequency is acceptable because a 184 day calibration interval is assumed in the setpoint analysis. This change is designated as more restrictive because Surveillances will be performed more frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.1.b ITS 3.3.2, DOC M.10

CTS Table 4.3-2, Functional Unit 6.b (Motor Driven AFW Pumps 4 kV Bus Loss of Voltage) and Functional Unit 7.b (Turbine Driven AFW Pump Reactor Coolant Pump Bus Undervoltage) require the performance of a CHANNEL CALIBRATION every 18 months, however the Surveillances are currently being performed more frequently. ITS Table 3.3.2-1 Function 6.e (Auxiliary Feedwater Loss of Voltage) and Function 6.f (Auxiliary Feedwater Undervoltage Reactor Coolant Pump) require the performance of a CHANNEL CALIBRATION every 184 days (ITS SR 3.3.2.7). This changes the CTS by changing the Frequency of the Surveillance from 18 months to 184 days.

The purpose of the CHANNEL CALIBRATION is to ensure the Motor Driven AFW Pumps 4 kV Bus Loss of Voltage and Turbine Driven AFW Pump Reactor Coolant Pump Bus Undervoltage channels will function as designed during an analyzed event. Changing the SR Frequency is acceptable because a 184 day calibration interval is assumed in the setpoint analysis. This change is designated as more restrictive because Surveillances will be performed more frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.1.c ITS 3.3.5, DOC M.2

CTS Table 4.3-2 requires a CHANNEL CALIBRATION of the Loss of Voltage and Degraded Voltage instrumentation every 18 months, however the Surveillances are currently being performed more frequently. ITS SR 3.3.5.3 requires the performance of a CHANNEL CALIBRATION for the ~~Degraded~~**Loss of** Voltage ~~Function every 31 days~~ and ~~ITS SR 3.3.5.5 requires the performance of a CHANNEL CALIBRATION for the Loss of~~**Degraded** Voltage Function**s** every 184 days. This changes the CTS by changing the Frequency of the Surveillance from 18 months to ~~either 31 days or~~ 184 days.

The purpose of CTS Table 4.3-2 is to ensure LOP DG start instrumentation will function as designed during an analyzed event. Changing the SR Frequency is acceptable because a ~~31 day and~~ 184 day calibration interval ~~(as applicable)~~ is assumed in the setpoint analysis. This change is designated as more restrictive because Surveillances will be performed more frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.2 Allowable value change results from extending channel calibration surveillance frequency

G.1.2.a ITS 3.3.1, DOC M.17

CTS Table 2.2-1 provides the Allowable Values for Functional Unit 8 (Overpower ΔT) (Unit 2 only), Functional Unit 9 (Pressurizer Pressure - Low) (Unit 1 only), Functional Unit 12 (Loss of Flow), Functional Unit 13, (Steam Generator Water Level - Low Low) (Unit 2 only), **and** Functional Unit 14, (Steam/Feedwater Flow Mismatch and Steam Generator Water Level - Low) (Steam Generator Water Level - Low portion only is covered by this change) (Unit 2 only)~~, and Functional Unit 16 (Underfrequency - Reactor Coolant Pumps) (Unit 1 only)~~. ITS Table 3.3.1-1 provides the Allowable Values for all the RTS Instrumentation Functions, including ITS Table 3.3.1-1 Functions 7, 8.a, 10, ~~13,~~ 14, and 15. This change revises the above specified CTS RTS Table 2.2-1 Allowable Values to the ITS Allowable Values.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.1 reflects Allowable Values consistent with the philosophy of Westinghouse **I**STS, NUREG-1431. These Allowable Values have been established consistent with the methods described in The licensee's Instrument Setpoint Methodology (EG-IC-004, "Instrument Setpoint Uncertainty," Revision 4). For most cases, the Allowable Value determinations were calculated using plant specific operating and Surveillance trend data. There were no changes to Safety Analysis Limits (SALs) required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that

applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II-1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Nominal Trip Setpoints (NTSPs) for each design or SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Values have also been established from each SAL by combining the errors associated with the CHANNEL OPERATIONAL TEST (COT) (e.g., device accuracy, setting tolerance, and drift) with the calculated Nominal Trip Setpoint using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the COT Use of the previously discussed methodologies for determining Allowable Values, instrument setpoints, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the ~~DC~~C**NP** design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/ Guidelines for Instrument Calibration Extension/Reduction Programs," Revision 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from Surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as more restrictive because more stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.2.b <u>ITS 3.3.1, DOC L.19</u>

CTS Table 2.2-1 provides the Allowable Values for Functional Unit 7 (Overtemperature .T), Functional Unit 8 (Overpower ΔT) (Unit 1 only), Functional Unit 9 (Pressurizer Pressure - Low) (Unit 2 only), Functional Unit 10, (Pressurizer Pressure - High), Functional Unit 11 (Pressurizer Water Level - High), Functional Unit 13, (Steam Generator Water Level - Low Low) (Unit 1 only), Functional Unit 14 (Steam/Feedwater Flow Mismatch and Steam Generator Water Level - Low) (Steam Generator Water Level - Low portion only is covered by this change) (Unit 1 only), and Functional Unit 16 (Underfrequency - Reactor Coolant Pumps) ~~**(Unit 2 only)**~~. ITS Table 3.3.1-1 provides the Allowable Values for all the RTS Instrumentation Functions, including ITS Table 3.3.1-1 Function 6, 7, 8.a, 8.b, 9, 13, 14, and 15. This change revises the above specified CTS RTS Table 2.2-1 Allowable Values to the ITS Allowable Values.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.1 reflects Allowable Values consistent with the philosophy of Westinghouse **I**STS, NUREG-1431. These Allowable Values have been established consistent with the methods described in The licensee's Instrument Setpoint Methodology (EG-IC-004, "Instrument Setpoint Uncertainty," Revision 4). For all cases where a SAL exists, the Allowable Value determinations were calculated using plant specific operating and Surveillance trend

data. For all other cases, existing Allowable Values were converted directly to the ITS Allowable Values. The Allowable Value verification used actual plant operating and surveillance trend information to ensure the validity of the developed Allowable Value. There were no changes to SALs required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II- 1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Setpoints for each SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Values have also been established from each SAL by combining the errors associated with the COT (e.g., device accuracy, setting tolerance, and drift) with the calculated Nominal Trip Setpoint using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the COT. Use of the previously discussed methodologies for determining Allowable Values, NTSPs, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the ~~DC~~C**NP** design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/ Guidelines for Instrument Calibration Extension/Reduction Programs," Revision 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from Surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as less restrictive because the less stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.2.c <u>ITS 3.3.2, DOC M.11</u>

CTS Table 3.3-4 provides the Allowable Values for Functional Unit 1.c (Safety Injection Containment Pressure - High), Functional Unit 1.f (Safety Injection Steam Line Pressure - Low) (Unit 1 only), Functional Unit 2.c (Containment Spray - Containment Pressure - High High), Functional Unit 3.b.3 (Containment Isolation Phase "B" Containment Pressure - High High), Functional Unit 4.c (Steam Line Isolation Containment Pressure – High High), Functional Unit 4.e (Steam Line Isolation Steam Line Pressure - Low) (Unit 1 only), Functional Unit 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 2 only), Functional Unit 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 2 only), and Functional Unit 10.c (Containment Pressure - High). ITS Table 3.3.2-1 provides the Allowable Values for all the ESFAS Instrumentation Functions, including ITS Table 3.3.2-1 Functions 1.c, 1.e.(1), 2.c, 3.b.(3), 4.c, 4.d, 6.c, and 7.c. This change revises the above specified CTS ESFAS Table 3.3-4 Allowable Values to the ITS Allowable Values.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.2 reflects Allowable Values consistent with the philosophy of Westinghouse **I**STS, NUREG-1431. These Allowable Values have been established consistent with the methods described in AEP's Instrument Setpoint Methodology (EG-IC-004, "Instrument Setpoint Uncertainty," Revision 4). For all cases where a SAL exists, the Allowable Value determinations were calculated using plant specific operating and surveillance trend data. For all other cases, existing Allowable Values were converted directly to the ITS Allowable Values. The Allowable Value verification used actual plant operating and surveillance trend information to ensure the validity of the developed Allowable Value. There were no changes to SALs required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II- 1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Setpoints for each SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Values have also been established from each SAL by combining the errors associated with the CHANNEL OPERATIONAL TEST (COT) (e.g., device accuracy, setting tolerance, and drift) with the calculated Nominal Trip Setpoint using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the COT. Use of the previously discussed methodologies for determining Allowable Values, NTSPs, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the ~~DC~~C**NP** design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/Guidelines for Instrument Calibration Extension/Reduction Programs," Revision 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from Surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as more restrictive because more stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.2.d <u>ITS 3.3.2, DOC L.22</u>

CTS Table 3.3-4 provides the Allowable Values for Functional Unit 1.d (Pressurizer Pressure - Low), Functional Unit 1.f (Steam Line Pressure - Low) (Unit 2 only), Functional Unit 4.d (Steam Line Isolation Steam Flow in Two Steam Lines - High Coincident with Tavg - Low Low) (Tavg - Low Low portion only is covered by this change), Functional Unit 4.e (Steam Line Isolation Steam Line Pressure - Low) (Unit 2 only), Functional Unit 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High) (Unit 2 only), Functional Unit 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 1 only),

Functional Unit 6.b (Motor Driven Auxiliary Feedwater Pumps 4 kV Loss of Voltage), and Functional Unit 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 1 only). CTS Table 3.3-3 provides the Setpoint (i.e., Allowable Value) for the P-12 Interlock (Tavg - Low Low). ITS Table 3.3.2-1 provides the Allowable Values for all the ESFAS Instrumentation Functions, including ITS Table 3.3.2-1 Functions 1.d, 1.e.(1), 4.d, 4.e, 5.b, 6.c, **6.e,** and 8.c. This change revises the above specified CTS ESFAS Table 3.3-4 Allowable Values to the ITS Allowable Values.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.2 reflects Allowable Values consistent with the philosophy of Westinghouse **I**STS, NUREG-1431. These Allowable Values have been established consistent with the methods described in AEP's Instrument Setpoint Methodology (EG-IC-004, "Instrument Setpoint Uncertainty," Revision 4). For all cases where an SAL exists, the Allowable Value determination were calculated using plant specific operating and surveillance trend data. For all other cases, existing Allowable Values were converted directly to the ITS Allowable Values. The Allowable Value verification used actual plant operating and surveillance trend information to ensure the validity of the developed Allowable Value. There were no changes to SALs required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II- 1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Setpoints for each SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Values have also been established from each SAL by combining the errors associated with the COT (e.g., device accuracy, setting tolerance, and drift) with the calculated NTSP using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the COT. Use of the previously discussed methodologies for determining Allowable Values, NTSPs, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the ~~DC~~C**NP** design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/Guidelines for Instrument Calibration Extension/Reduction Programs," Revision 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as less restrictive because the less stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.2.e <u>ITS 3.3.5, DOC M.3</u>

CTS Table 3.3-4 provides the Allowable Values for Functional Unit 8.a (4 kV Loss of Voltage). ITS SR 3.3.5.3 provides the Allowable Values for the Loss of Voltage Function. This change revises the CTS Table 3.3-4 Allowable Value to the ITS Allowable Value for this Function.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.5 reflects Allowable Values consistent with the philosophy of Westinghouse ISTS, NUREG-1431. These Allowable Values have been established consistent with the current setpoint methodology. The Allowable Value determination was calculated using plant specific operating and surveillance trend data. The Allowable Value verification used actual plant operating and surveillance trend information to ensure the validity of the developed Allowable Value. There were no changes to Safety Analysis Limits (SALs) required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II-1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Setpoints for each SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Value has also been established from the SAL by combining the errors associated with the CHANNEL CALIBRATION (e.g., device accuracy, setting tolerance, and drift), when applicable, with the calculated Nominal Trip Setpoint using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the CHANNEL CALIBRATION. Use of the previously discussed methodologies for determining Allowable Values, Nominal Trip Setpoints, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the CNP design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/Guidelines for Instrument Calibration Extension/Reduction Programs," Rev. 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from Surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as more restrictive because more stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.2.f <u>ITS 3.3.5, DOC L.6</u>

CTS Table 3.3-4 provides the Allowable Values for Functional Unit 8.b (4 kV Degraded Voltage). ITS SR 3.3.5.3 provides the Allowable Values for the Degraded Voltage Function. This change revises the CTS Table 3.3-4 Allowable Value to the ITS Allowable Value for this Function.

The purpose of the Allowable Values is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.5 reflects Allowable Values consistent with the philosophy of Westinghouse ISTS, NUREG-1431. These Allowable Values have been established consistent with the current setpoint methodology. The Allowable Value determination was calculated using plant specific operating and surveillance trend data. The Allowable Value verification used actual plant operating and surveillance trend information to ensure the validity of the developed Allowable Value. There were no changes to Safety Analysis Limits (SALs) required due to instrument performance. All design limits applied in the methodologies were confirmed as ensuring that applicable design requirements of the associated systems and equipment are maintained. The methodologies used have been compared with the guidance of ANSI/ISA S67.04-Part I-1994 and ANSI/ISA RP67.04-Part II-1994. Plant calibration procedures will ensure that the assumptions regarding calibration accuracy, measurement and test equipment accuracy, and setting tolerance are maintained. Setpoints for each SAL have been established by accounting for the applicable instrument accuracy, calibration and drift uncertainties, environmental effects, power supply fluctuations, as well as uncertainties related to process and primary element measurement accuracy using the instrument setpoint methodology. The Allowable Value has also been established from the SAL by combining the errors associated with the CHANNEL CALIBRATION (e.g., device accuracy, setting tolerance, and drift), when applicable, with the calculated Nominal Trip Setpoint using the instrument setpoint methodology. Where a SAL exists, trigger values are used to ensure that the Allowable Value provides sufficient margin from the SAL to account for any associated errors not confirmed by the CHANNEL CALIBRATION. Use of the previously discussed methodologies for determining Allowable Values, Nominal Trip Setpoints, and analyzing channel/instrument performance ensure that the design basis and associated SALs will not be exceeded during plant operation. These evaluations, determinations, and analyses now form a portion of the CNP design bases. Additionally, each applicable channel/instrument has been evaluated and analyzed to support a fuel cycle extension to a 24 month interval. These drift evaluations and drift analyses have been performed utilizing the guidance provided in EPRI TR-103335, "Statistical Analysis of Instrument Calibration Data/Guidelines for Instrument Calibration Extension/Reduction Programs," Rev. 1. The EPRI guidance was used to demonstrate that the data collected by the operating plant (from Surveillance testing) has remained acceptable and reasonable with regard to the manufacturers design specifications. Therefore, based on the above discussion, the changes to the Allowable Values are acceptable. This change is designated as less restrictive because less stringent Allowable Values are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.3 Surveillance frequency revisions using NRC Generic Letter 91-04 guidelines

G.1.3.a ITS 3.3.1, DOC L.18

CTS Table 4.3-1 requires a CHANNEL FUNCTIONAL TEST of Functional Units 6 (Source Range Neutron Flux), 16 (Undervoltage - Reactor Coolant Pumps), and 17 (Underfrequency - Reactor Coolant Pumps) instrumentation every 31 days. ITS SR 3.3.1.1~~0~~**1** requires the performance of a COT for the Source Range Neutron Flux instrumentation every 184 days and ITS SR 3.3.1.1~~1~~**0** requires the performance of a TADOT for the Undervoltage RCPs and Underfrequency RCPs instrumentation every ~~184~~**92** days. This changes the CTS by extending the Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to **either** 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) **or 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2)**. The change from a CHANNEL FUNCTIONAL TEST to a COT or TADOT is discussed in DOC A.20.

The purpose of the CHANNEL FUNCTIONAL TEST requirement in CTS Table 4.3-1 is to ensure the channels of the Source Range Neutron Flux, Undervoltage - Reactor Coolant Pumps, and Underfrequency - Reactor Coolant Pumps Functions will function as designed during an analyzed event. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for this COT and TADOT is acceptable because for the Undervoltage RCPs and Underfrequency RCPs trips, the probability of significant variations of the RCP pump power supply is remote due to the plant electrical system and the offsite grid reliability, and for the Source Range Neutron Flux trip, the source range monitors are always checked prior to use and overlap is confirmed between the source and intermediate range monitors during startup and shutdown. During operations where the Source Range Neutron Flux trip is required, a significant change in detected power level would be noticed and investigated by plant operators. Based on the inherent system and component reliability the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 184 day **or 92 day** Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (230 **or 115** days) does not invalidate any assumptions in the plant licensing basis. **In addition, a 184 day Surveillance Frequency for the Source Range Neutron Flux Function is justified by WCAP-15376-P, Revision 0, "Risk-Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," and TSTF-411, Revision 1, "Surveillance Test Interval Extension for Components of the Reactor Protection System." A 92 day Surveillance Frequency for the Undervoltage RCPs and Underfrequency RCPs Functions is also justified by WCAP-10271-P, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System."** This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.3.b ITS 3.3.2, DOC L.19

CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST of the ~~**Motor Driven Auxiliary Feedwater Pumps 4 kv Bus Loss of Voltage and the**~~ Turbine Driven Auxiliary Feedwater Pump Reactor Coolant Pump Bus Undervoltage instrumentation every 31 days. ITS SR 3.3.2.~~**6**~~**5** requires the performance of a TADOT for the Auxiliary Feedwater ~~Loss of Voltage and~~ Undervoltage Reactor Coolant Pump instrumentation every ~~**184**~~**92** days. This changes the CTS by extending the Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to ~~**184**~~**92** days (i.e., a maximum of ~~**230**~~**115** days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.10.

The purpose of the CHANNEL FUNCTIONAL TEST requirement in CTS Table 4.3-2 is to ensure the channels of the ~~**Motor Driven Auxiliary Feedwater Pumps 4 kv Bus Loss of Voltage and the**~~ Turbine Driven Auxiliary Feedwater Pump Reactor Coolant Pump Bus Undervoltage Functions will function as designed during an analyzed event. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for this CHANNEL FUNCTIONAL TEST (i.e., TADOT) is acceptable because the probability of significant variations of the pump power supply is remote, due to the plant electrical system and the offsite grid reliability. Based on the power supply reliability and on the inherent system and component reliability the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed ~~**184**~~**92** day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (~~**230**~~**115** days) does not invalidate any assumptions in the plant licensing basis. **In addition, a 92 day Surveillance Frequency for the Turbine Driven Auxiliary Feedwater Pump Reactor Coolant Pump Bus Undervoltage Function is also justified by WCAP-10271-P, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System."** This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.3.c ~~**ITS 3.3.5, DOC L.5**~~**Deleted**

~~**CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST of the Loss of Voltage instrumentation every 31 days. ITS SR 3.3.5.4 requires the performance of a TADOT for the Loss of Voltage Function every 184 days. This changes the CTS by extending the**~~

~~Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.4.~~

~~The purpose of the CHANNEL FUNCTIONAL TEST requirement in CTS Table 4.3-2 is to ensure the channels of the Loss of Voltage Function will function as designed during an analyzed event (i.e., a total loss of offsite power). An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for this TADOT is acceptable because the reliability and conservative settings of the plant protective equipment, combined with the low probability of a total loss of offsite power, provide a high confidence in proper system operation. Based on the inherent system and component reliability the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 184 day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (230 days) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS. ITS than were applied in the CTS.~~

~~[NRC evaluation to be provided later.]~~

G.1.3.d ~~ITS 3.3.6, DOC L.9~~ **Deleted**

~~CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST of the Containment Radioactivity - High Functional Unit instrumentation every 92 days and CTS Table 4.3-3 requires a CHANNEL FUNCTIONAL TEST of the containment area radiation, particulate, and noble gas channels every 92 days. CTS 4.9.9 states that the Containment Purge and Exhaust Isolation System shall be demonstrated OPERABLE, in part, once per 7 days during the specified conditions. ITS SR 3.3.6.6 requires, for the Containment Radiation Functions of the Containment Purge Supply and Exhaust System isolation instrumentation, the performance of a CHANNEL OPERATIONAL TEST once per 184 days. This changes the CTS by extending the Frequency of the Surveillance from 7 days or 92 days (i.e., for the 92 day Frequency, a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to CHANNEL OPERATIONAL TEST is addressed in DOC A.4.~~

~~The purpose of the CHANNEL FUNCTIONAL TEST requirement in CTS Tables 4.3-2 and 4.3-3 is to ensure the channels of the Containment Radiation Function will function as~~

~~designed during an analyzed event. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Based on the inherent system and component reliability the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 184 day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (230 days) does not invalidate any assumptions in the plant licensing basis. The purpose of CTS 4.9.9 is to verify the Containment Purge and Exhaust Isolation System is OPERABLE. The Containment Purge and Exhaust Isolation System includes the instrumentation that provides a containment high radiation isolation signal to the containment purge supply and exhaust isolation valves. During MODES 1, 2, 3, 4, and during MODE 6, CTS Tables 4.3-2 and 4.3-3 require the performance of a CHANNEL FUNCTIONAL TEST for this containment radiation instrumentation once per 92 days (changed to 184 days as described above). This change is acceptable because the periodic Surveillance Frequency for MODES 1, 2, 3, 4 and 6 has been evaluated to ensure that it provides an acceptable level of equipment reliability. For CTS 4.9.9, the same periodic Surveillance Frequency (once per 184 days) for verifying Containment Purge and Exhaust Isolation System OPERABILITY is acceptable during the MODE of Applicability, and is also acceptable during the period prior to entering the MODE of Applicability. These changes are designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.~~

~~[NRC evaluation to be provided later.]~~

G.1.3.e ~~ITS 3.4.15, DOC L.8~~ **Deleted**

~~CTS Table 4.3-3 requires a CHANNEL FUNCTIONAL TEST of the particulate and noble gas channels every 92 days. ITS SR 3.4.15.2 requires the performance of a COT of the required containment atmosphere radioactivity monitors every 184 days. This changes the CTS by extending the Frequency of the Surveillance from 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a COT is discussed in DOC A.3.~~

~~The purpose of the CHANNEL FUNCTIONAL TEST requirement in CTS Table 4.3-3 is to ensure the channels of the required containment atmosphere radioactivity monitors will function as designed to detect a change in RCS leakage. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests~~

~~**normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for this COT is acceptable because the accuracy of the indication of leakage is not changed due to the extended surveillance interval. Based on the inherent system accuracy and component reliability the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 184 day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (230 days) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances may be performed less frequently under the ITS than under the CTS.**~~

~~**[NRC evaluation to be provided later.]**~~

G.1.3.f <u>ITS 3.6.9, DOC L.3</u>

CTS 4.6.4.3.a requires energizing the supply breakers and verifying at least 34 ignitors per train are energized and CTS 4.6.4.3.b requires verifying at least one hydrogen ignitor per train is OPERABLE in each containment region. These tests are required every 92 days. ITS SR 3.6.9.1 and SR 3.6.9.2 require the performance of similar Surveillances (as modified by DOC L.1), but at a Frequency of 184 days. This changes the CTS by extending the Frequency of the Surveillances from 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).

The purpose of CTS 4.6.4.3.a and b is to ensure the Distributed Ignition System will function as designed during an analyzed event. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for these Surveillances is acceptable because the Distributed Ignition System is a relatively simple, manually initiated system that does not interface or interact with other systems and is only dependent on electrical power to operate. Thus there are limited failure mechanisms that could impact the system. The primary operating element associated with the Distributed Ignition System is analogous to a glow plug that provides a localized ignition source for the hydrogen generated in the containment following certain accidents. In addition, there are two independent and redundant trains, each of which is fully capable of performing the required safety function. The surveillance history was reviewed and did not indicate any failures that would impact the ability of the system to carry out its required safety function. Therefore, based on the inherent system and component simplicity and reliability, system redundancy, and the results of the failure analysis evaluation, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 184 day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (230 days) does not invalidate any assumptions in the plant licensing basis. This change is

designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.3.g ITS 3.7.10, DOC L.3

CTS 4.7.5.1.b requires the CREV trains be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the system operates for at least 15 minutes. ITS SR 3.7.10.1 requires the performance of a similar Surveillance, but at a Frequency of ~~184~~**46** days **on a STAGGERED TEST BASIS**. This changes the CTS by extending the Frequency of the Surveillances **for each train** from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to ~~184~~**92** days (i.e., a maximum of ~~230~~**115** days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). ~~**The deletion of the STAGGERED TEST BASIS requirement is discussed in DOC L.1.**~~

The purpose of CTS 4.7.5.1.b is to provide a degree of assurance that the CREV trains will operate properly when required. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Review of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for these Surveillances is acceptable for the following reasons: a) Many of the system's components are shared with the Control Room Air Conditioning System, therefore significant portions of the CREV System are monitored during normal operation; and b) Those portions of the system that are not normally operating have surveillance history that indicates they are highly reliable. In addition, there are two independent and redundant CREV System filter unit fans, each of which is capable of performing the required safety function. Therefore, based on system redundancy, the inherent system and component reliability, and the fact that many of the system components are normally operating, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed ~~184~~**92** day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (~~230~~**115** days) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.3.h ITS 3.7.12, DOC L.3

CTS 4.7.6.1.a requires the ESF Ventilation System trains be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying the train operates for at least 15 minutes. ITS SR 3.7.12.1 requires the performance of a similar Surveillance, but at a

Frequency of ~~184~~46 days **on a STAGGERED TEST BASIS**. This changes the CTS by extending the Frequency of the Surveillances **for each train** from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to ~~184~~92 days (i.e., a maximum of ~~230~~115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). ~~The deletion of the STAGGERED TEST BASIS requirement is discussed in DOC L.1.~~

The purpose of CTS 4.7.6.1.a is to provide a degree of assurance that the ESF Ventilation System trains will operate properly when required. An evaluation of the surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for these Surveillances is acceptable for the following reasons: a) one of the two redundant ESF Ventilation trains is normally operating, directing air flow through the HEPA filter and the roughing filter but bypassing the charcoal adsorber. Therefore the major system components are monitored during normal operation; and b) those portions of the system that are not normally operating have surveillance history that indicates they are highly reliable. In addition, there are two independent and redundant ESF Ventilation trains, each of which is capable of performing the required safety function. Therefore, based on system redundancy, the inherent system and component reliability, and the fact that many of the system components are normally operating, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed ~~184~~92 day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (~~230~~115 days) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.3.h <u>ITS 3.7.13, DOC L.5</u>

CTS 4.9.12.a states that the required FHAEV System shall be demonstrated OPERABLE at least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for a least 15 minutes. ITS SR 3.7.13.2 requires the performance of a similar Surveillance, but at a Frequency of ~~184~~92 days. This changes the CTS by extending the Frequency of the Surveillances from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to ~~184~~92 days (i.e., a maximum of ~~230~~115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).

The purpose of CTS 4.9.12.a is to provide a degree of assurance that the required FHAEV train will operate properly when required. An evaluation of th surveillance interval extension was performed, based on the same approach described in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine

failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for these Surveillances is acceptable for the following reasons: a) one train of the FHAEV is in operation whenever irradiated fuel assemblies are being moved in the auxiliary building. Thus the FHAEV System's condition is monitored during normal spent fuel handling operations; and b) those portions of the system that are not normally operating have surveillance history that indicates they are highly reliable. In addition, there are two independent an redundant FHAEV System fans, each of which is capable of performing the required safety function. Therefore, based on system redundancy, the inherent system and component reliability, and the fact that many of the system components are normally operating, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed ~~184~~**92** day Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (~~230~~**115** days) does not invalidate any assumptions in the plant licensing basis. This change is designated less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.1.4 <u>ITS 3.3.2, DOC L.20</u>

CTS Table 3.3-3, Functional Unit 9.a (Safety Injection, Manual Initiation) requires a total of two channels per train to be OPERABLE. ITS Table 3.3.2-1, Function 1.a requires only one channel per train to be OPERABLE. This changes the CTS by decreasing the number of manual channels require OPERABLE from two per train to one per train.

The purpose of Safety Injection (SI) Manual Initiation Function is to ensure the capability exists to manually initiate the Safety Injection trains. The SI Manual Initiation Function at ~~DC~~C**NP** is provided by four switches, two per train. Each switch will actuate the associated SI train (i.e., the two train A switches are fully redundant to each other and the two train B switches are fully redundant to each other). The only difference between the two switches within a train are their location within the control room. NUREG-1431 only requires two Manual Initiation channels to be OPERABLE, since a typical Westinghouse plant only has two channels installed. This change is acceptable since each channel within a train is fully redundant to the other channel in that train for the SI Manual Initiation Function, and the fact that it is consistent with the NUREG-1431 requirements. In addition, if the single required manual initiation switch does not function, the associated SI train can still be initiated using the individual component control switches that exist in the control room. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.5 <u>ITS 3.3.6, DOC L.10</u>

CTS Table 3.3-3, Functional Units 9.b and 9.c (Manual Containment Purge and Exhaust Isolation) require a total of 2 channels per train to be OPERABLE (1 channel per train for Functional Unit 9.b and 1 channel per train for Functional Unit 9.c). ITS Table 3.3.6-1, Function 1 (Manual Initiation) requires only one channel per train to be OPERABLE. This changes the

CTS be decreasing the number of manual channels required OPERABLE from two per train to one per train.

The purpose of the Containment Purge Supply and Exhaust Manual Initiation Function is to ensure the capability exists to manually isolate the Containment Purge Supply and Exhaust System isolation valves. The Containment Purge Supply and Exhaust System Manual Initiation Function at ~~DC~~C**NP** is provided by four switches, two per train. Each switch will actuate all Containment Purge Supply and Exhaust System isolation valves in its associated train (i.e., the two train A switches are fully redundant to each other and the two train B switches are fully redundant to each other). The differences between the two switches within a train are their location within the control room, and one of the two switches also actuates Containment Isolation Phase A while the other switch also actuates the Containment Spray subsystem and Containment Isolation Phase B. There is no manual switch that only initiates a Containment Purge Supply and Exhaust System isolation at ~~DC~~C**NP**. One train A switch and one train B switch are located on the Containment Spray System panel, while one train A switch and one train B switch are located on the Ventilation System panel. The CTS requires both channels per train OPERABLE because the CTS groups the Containment Purge Supply and Exhaust manual initiation function by switch function. Therefore, it is listed twice in CTS Table 3.3-3, Functional Unit 9: once for the Containment Spray subsystem and Containment Isolation Phase B switch (Functional Unit 9.b) and once for the Containment Isolation Phase A switch (Functional Unit 9.c). NUREG-1431 only requires two Manual Initiation channels to be OPERABLE, since a typical Westinghouse plant only has two channels installed. This change is acceptable since each channel within a train is fully redundant to the other channel in that train for the Containment Purge Supply and Exhaust System Manual Initiation Function, and the fact that it is consistent with the NUREG-1431 requirements. In addition, if the single required manual initiation switch does not function, then the associated Containment Purge Supply and Exhaust System valves can still be closed using individual valve control switches that exist in the control room. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.1.6 <u>ITS 3.3.6, DOC L.11</u>

CTS Table 4.3-3 footnote * requires performance of a SOURCE CHECK as part of the shiftly CHANNEL CHECK requirements for Containment Radiation instrumentation (Instruments 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii). ITS 3.3.6 does not include this requirement. This changes the CTS by deleting the shiftly SOURCE CHECK requirement on the Containment Radiation instrumentation.

A SOURCE CHECK is a qualitative assessment of channel response when the channel sensor is exposed to a radioactive source. The purpose for performing the SOURCE CHECK on these instruments is to ensure on-scale reading of the instruments. However, the background radiation levels in the vicinity of these instruments is sufficiently high enough to provide an on-scale reading for the instruments. Thus, the required routine (every 12 hours) CHANNEL CHECK (ITS SR 3.3.6.1) will ensure the on-scale reading of the instruments (i.e., the instruments are not "pegged-low"). In addition, the Containment Radiation instruments have a low failure alarm to alert the operators of a failed-low radiation detector. Therefore, the deletion

of this specific requirement is acceptable. This change is designated as less restrictive because a Surveillance Requirement is being deleted.

[NRC evaluation to be provided later.]

G.1.7 ITS 3.4.6, DOC L.1

CTS LCO 3.4.1.3.c requires at least three reactor coolant loops to be in operation when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal. CTS 3.4.1.3 Action b specifies the compensatory actions for less than the number of required OPERABLE or operating coolant loops specified in CTS LCO 3.4.1.3.c. ITS LCO 3.4.6 requires two loops consisting of any combination of RCS loops and residual heat removal (RHR) loops to be OPERABLE, and one loop to be in operation. This changes the CTS by deleting more restrictive coolant loop requirements based on the status of the Rod Control System. In addition, due to this change, the CTS LCO 3.4.1.3.b reference to the position of the reactor trip breakers or the capability of the control rod drive system is deleted.

The purpose of CTS 3.4.1.3, as described in the CTS Bases, is to ensure that sufficient RCS flow and cooling are provided for decay heat removal. In addition, the purpose of the CTS LCO 3.4.1.3.c requirement is to ensure the appropriate number of coolant loops are OPERABLE and in operation to support the safety analysis associated with the uncontrolled rod cluster control assembly bank withdrawal event from a subcritical condition. The original licensing basis for both Unit 1 and Unit 2 required two coolant loops to be OPERABLE and one loop to be in operation in MODE 4. The second reactor coolant pump (RCP) was included for single failure considerations. Requirements to ensure the assumptions for an uncontrolled rod cluster control assembly bank withdrawal event were only included in CTS 3.4.1.2, the MODE 3 RCS loops TS. This was consistent with the initial RCS temperature and pressure assumptions for the uncontrolled rod cluster control assembly bank withdrawal event, which corresponded to MODE 3. The Unit 2 TSs were amended (Amendment No. 82) in cycle 6 to reflect a transition from fuel manufactured by Westinghouse Electric Company to fuel manufactured by Exxon Nuclear Company. As a part of this Amendment, requirements related to the number of RCPs required to be in operation were included in both the MODE 3 and MODE 4 RCS loop TSs (CTS 3.4.1.2 and CTS 3.4.1.3) to correspond to the initial condition of the Exxon Nuclear Company uncontrolled rod cluster control assembly bank withdrawal event. For consistency, the Unit 1 TSs were revised (Amendment No. 120) in a like manner, even though fuel manufactured by Exxon Nuclear Company was never used in Unit 1. Prior to cycle 8 for Unit 2, fresh reload fuel was again furnished by Westinghouse Electric Company using the Vantage 5 fuel assembly design. However, the ~~DC~~C**NP** TSs were not amended to reflect the less restrictive assumptions of the Westinghouse uncontrolled rod cluster control assembly bank withdrawal event analysis. This change was not made because the requirements in the CTS were conservative relative to the initial conditions assumed in the Westinghouse analysis (i.e., the Exxon Nuclear Company uncontrolled rod cluster control assembly bank withdrawal event analysis assumed 3 RCPs in operation while the Westinghouse analysis for the same event assumes only 2 RCPs are in operation). ~~DC~~C**NP** is now revising the CTS to be consistent with the current analysis, including only requiring TSs to control an uncontrolled rod cluster control assembly bank withdrawal event from a shutdown condition in MODE 3. This change is acceptable for the following reasons: a) It ensures alignment between the ~~DC~~C**NP** TSs and the initial conditions assumed in the current uncontrolled rod cluster control assembly bank withdrawal event analysis; and b) It establishes consistency between the ~~DC~~C**NP** TSs and the **I**STS (NUREG-1431, **I**STS LCO 3.4.6) and

associated ISTS Bases, which do not assume an uncontrolled rod cluster control assembly bank withdrawal event in MODE 4. This is also consistent with the initial accident assumptions required by NUREG-0800, Section 15.4.1 (which discusses the review requirements for an uncontrolled rod cluster control assembly bank withdrawal event), and is consistent with the original ~~DC~~CNP licensing basis prior to the transition to fuel manufactured by Exxon Nuclear Company (which did not require TSs to cover an uncontrolled rod cluster control assembly bank withdrawal event in MODE 4). This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

NRC Staff Evaluation:

The CTS SR 3.4.1.3 specifies the requirements for the residual heat removal (RHR) capability in MODE 4. The licensee proposed to change CTSs 3.4.1.3.a and 3.4.1.3.b to become Improved Technical Specification (ITS) 3.4.6. The proposed I~~S~~TS LCO 3.4.6 requires that two loops consisting of any combination of Reactor Coolant System (RCS) loops and RHR loops must be OPERABLE, and one loop must be in operation in MODE 4. The licensee also proposed to delete CTS 3.4.1.3.c, which requires that at least three RCS loops must be in operation in MODE 4 when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal. The proposed ITS changes the CTS by deleting more restrictive coolant loop requirements based on the status of the rod control system.

The CTS 3.4.1.3 requirements ensure that sufficient RCS flow and cooling are provided for decay heat removal in MODE 4. In addition, the requirements of CTS 3.4.1.3.c (for MODE 4) ensure the appropriate number of coolant loops that are OPERABLE and in operation to support the safety analysis associated with the rod cluster control assembly (RCCA) withdrawal from a subcritical condition. The original ~~D. C. COOK~~CNP TS required two coolant loops to be OPERABLE and one loop to be in operation in MODE 4. The original requirements to ensure that the plant configuration was consistent with the assumptions used in a RCCA withdrawal analysis were only included in CTS 3.1.4.2, the MODE 3 RCS loops Technical Specifications (TSs). The CTS 3.1.4.2 requirements were consistent with the assumptions associated with the initial RCS temperature, pressure and the required number of operating reactor coolant pumps (RCPs) used in the analysis for a RCCA withdrawal event initiating from MODE 3.

In Cycle 6, the Unit 2 TSs were amended (Amendment No. 82) to reflect a transition from fuel manufactured by Westinghouse Electric Company (WEC) to fuel manufactured by Exxon Nuclear Company (ENC). As a part of this amendment, requirements related to the number of RCPs required to be in operation were included in both the MODE 3 and MODE 4 RCS loops TSs (CTS 3.4.1.2 and CTS 3.4.1.3) to reflect the initial conditions assumed in the ENC analysis for a RCCA withdrawal event, which assumed that three RCPs were in operation. The Unit 1 TSs were revised (Amendment No. 120) to be consistent with the Unit 2 TSs, even though fuel manufactured by the ENC was never used in Unit 1. Prior to Cycle 8 for Unit 2, fuel by the WEC was furnished using the Vantage 5 fuel assembly design. However, the TSs for MODE 4 with requirements of three RCPs in operation were not amended because the TS requirements were bounded by the existing WEC RCCA withdrawal analysis. In the WEC analysis, two RCPs were assumed to be in operation, and the reactor was assumed to be at hot zero power (547 degrees F), or MODE 3. The assumption of initial RCS temperature assumed in the WEC analysis for MODE 3 is more conservative than that of a lower initial RCS temperature for MODE 4. The higher initial system temperature yields a larger fuel-to-water heat transfer, a larger fuel thermal capacity, and a less-negative (smaller absolute magnitude) Doppler coefficient. The less-

negative Doppler coefficient reduces the Doppler feedback effect thereby increasing the neutron flux peak. The high neutron flux peak combined with a high fuel thermal capacity and larger thermal conductivity yields a larger peak heat flux. Therefore, in the current WEC licensing basis analysis for both Unit 1 and Unit 2, the number of RCPs in operation at the initiation of the event has a direct impact on core cooling, with the most-limiting condition for departure from nucleate boiling (DNB) being with the fewest number of RCPs used in operation by the WEC analysis (i.e., two) at the highest RCS temperature (i.e., MODE 3 and average RCS temperature of 547 degrees F). With a larger number of RCPs in operation (i.e., three RCPs in operation as assumed in the ENC analysis), and at lower RCS temperatures, a RCCA withdrawal from a subcritical condition would result in a higher DNB ratio.

The licensee proposed to revise the CTS to be consistent with the WEC analysis, including only requiring CTS 3.4.1.2 to be consistent with the assumptions (such as the required number of operating RCPs) used in the analysis for a RCCA withdrawal event initiating from the MODE 3 conditions. In addition, the proposed ITS 3.4.6 will establish consistency between the licensee's TSs and the WEC standard TS (NUREG-1431, **Improved** Standard TS (**I**STS) LCO 3.4.6) and its associated Bases, which do not specify a RCCA withdrawal event in MODE 4 as a design basis event (DBE). Also, as specified in I~~S~~T**S** Table 3.3-1 (footnote a), the source range high neutron flux trip is required to be in operation in shutdown modes, including MODE 4, with the control rod drive system (CRDS) capable of rod withdrawal. If the CRDS is not capable of rod withdrawal, then a RCCA withdrawal event is precluded. With the I~~S~~T**S** Table 3.3-1 requirements, the source range high neutron flux trip will be available to terminate the event, by tripping any withdrawing RCCA before any significant power level can be attained in MODE 4.

During the course of the review, the NRC staff requested the licensee to clarify possible effects of the transition of the ENC fuel to WEC fuel to the plant parameters. The licensee responded on August 14, 2004, that the plant parameters were not affected by the reloading of the WEC fuel into Unit 2. A reload safety analysis was performed by the licensee in 1993 on both Unit 1 and Unit 2 after loading the WEC fuel and no changes were made to the parameters changes that would affect the analysis of the RCCA withdrawal from a subcritical condition event.

The NRC staff also asked the licensee to provide clarification on the status of the ENC analysis for MODE 4. The licensee responded to the RAI on September 1, 2004 that the ENC methodology had evolved and changed throughout the NRC staff review and approval process after Cycle 6. The licensee decided to completely revert back to the WEC methodology, and this change was approved by the NRC as Unit 1 and 2 License Amendments 148 and 134, respectively, dated August 27, 1990. Subsequently, the WEC fuel was reloaded into Unit 2 prior to Cycle 8.

The regulatory requirement for the proposed TS changes is 10 CFR 50.36, which relates to the content of the TSs. As for the review, the NRC staff used NUREG-1431 (Rev. 3), Standard Technical Specifications - Westinghouse Plants, since the development of the **I**STS were based on the 10 CFR 50.36 requirements and the licensee utilizes the nuclear steam supply system manufactured by Westinghouse Electric Company (WEC).

The NRC staff reviewed the proposed ITS LCO 3.4.6 in comparison with WEC **I**STS 3.4.6 (documented in NUREG-1431), RCS Loops - MODE 4. The NRC staff found that ITS LCO 3.4.6 adequately reflects the previously approved licensing basis for the usage of the WES fuel, and is consistent with the WEC **I**STS and its associated Bases in terms of the required coolant

loops for decay heat removal. Therefore, the NRC staff concludes that the proposed ITS LCO 3.4.6 is acceptable.

G.1.8 Using a specified point in the steam generators to specifically state required water level

G.1.8.a ITS 3.4.6, DOC L.5

CTS 4.4.1.3.3 states that the required steam generator(s) shall be determined OPERABLE by verifying secondary side water level is greater than or equal to 76% of wide range instrument span. ITS SR 3.4.6.2 requires verification that the steam generator (SG) secondary side water levels are above the ~~top of the U-tubes~~**lower tap of the steam generator wide range level instrumentation by ≥ 420 inches (Unit 1) and ≥ 418.77 inches (Unit 2)** for the required RCS loops steam generators. This changes the CTS by changing the requirement to specifically state the required water level as referenced to a specific point ~~inside~~**external to** the steam generators instead of using a specific indication from one instrument.

The purpose of CTS 4.4.1.3.3 is to provide assurance that the SG water level is above the top of the U-tubes. The change is acceptable since the proposed SG level will continue to ensure that the SG water level is above the top of the U-tubes, ensuring that an adequate secondary side heat sink is maintained. This requirement is also consistent with the NRC Safety Evaluation Report (SER) for License Amendments 224 (Unit 1) and 208 (Unit 2), dated November 27, 1998, which stated that the requirement is to ensure the U-tubes are covered. Also, as stated in the NRC SER, the current value, based on the wide range instrument, is a conservative value. The ITS will continue to require a periodic check to ensure proper SG levels are maintained, and the Bases states that one method for verifying the SG water level is within the limit is to verify the SG water level is ~~> 76~~**≥ 79**% wide range instrument span (a second method using ~~the~~**a SG water level ≥ 6%** narrow range instrument is also being included in the Bases). This change is defined as less restrictive because less stringent Surveillance Requirements are being applied in the ITS than were applied in the CTS.

The NRC staff evaluation of the above proposed change is included in the evaluation at the end of Section G.1.8.b for the entire Section G.1.8.

G.1.8.b ITS 3.4.7, DOC L.3

CTS 3.4.1.4.b states that the secondary side water level of at least two steam generators shall be greater than or equal to 76% of wide range instrument span. ITS LCO 3.4.7.b requires the secondary side water level of at least two steam generators to be above the ~~top of the U-tubes~~**lower tap of the steam generator wide range level instrumentation by ≥ 420 inches (Unit 1) and ≥ 418.77 inches (Unit 2)**. This changes the CTS by changing the requirement to specifically state the required water level as referenced to a specific point ~~inside~~**external to** the steam generators instead of using a specific indication from one instrument.

The purpose of CTS 3.4.1.4.b is to provide assurance that the SG water level is above the top of the U-tubes. The change is acceptable since the proposed SG level will continue to ensure that the SG water level is above the top of the U-tubes, ensuring that an adequate secondary side heat sink is maintained. This requirement is also consistent with the NRC Safety Evaluation Report (SER) for License Amendments 224 (Unit 1) and 208 (Unit 2), dated

November 27, 1998, which stated that the requirement is to ensure the U-tubes are covered. Also, as stated in the NRC SER, the current value, based on the wide range instrument, is a conservative value. The ITS will continue to require a periodic check to ensure proper SG levels are maintained, and the Bases states that one method for verifying the SG water level is within the limit is to verify the SG water level is ~~> 76~~**≥ 79**% wide range instrument span (a second method, using ~~the~~**a SG water level ≥ 6%** narrow range instrument, is also being included in the Bases). This change is defined as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

NRC Staff Evaluation:

As part of the ITS conversion program, the licensee proposed to change the CTS 4.4.1.3.3 to become ITS SR 3.4.6.2. CTS 4.4.1.3.3 states that the required steam generator(s) shall be determined OPERABLE by verifying secondary side to be greater than or equal to 76% of wide range instrument span. The proposed ITS SR 3.4.6.2 (on pages 146 and 148 of Ref. 1) requires verification that the steam generator (SG) secondary side water level is above the top of the U-tubes for the required RCS loop SGs. The licensee indicated that its implementation of the ITS is to convert the CTS for the ~~D. C. Cook plant (DC~~CN~~P),~~ Units 1 and 2 to be consistent with the Improved Standard Technical Specifications (ISTS) documented in NUREG-1431 (Revision 2), "Standard Technical Specifications - Westinghouse Plants."

As documented in NUREG-1431 for a TS corresponding to ITS SR 3.4.6.2, ISTS SR 3.4.6.1 requires verification that SG secondary side water levels are ≥ [17]% for required loops. ISTS SR 3.4.6.1 Bases clarify that SG operability is verified by ensuring that the secondary side water level is ≥ [17]% of the narrow range instrument span.

In comparison of the proposed ITS SR 3.4.6.2 with ISTS SR 3.4.6.1, the NRC staff finds that ISTS SR 3.4.6.1 requires a specific instrumentation (the narrow range instrument) to measure the SG water level and ensure that it is greater than or equal to a plant specific value, while the proposed ITS SR 3.4.6.2 neither includes a measurable value to ensure adequacy of the SG heat removal capability, nor specifies an instrumentation to be used for the SG water level measurement. The licensee specifies the water level measurement instrumentation and the acceptable SG water level limits in the Bases section of the associated ITS. Specifically, ITS SR 3.4.6.2 Bases (Insert 6 on page 167 of Ref. 1) clarify that the wide range or narrow range instruments can be used to measure the water level and verify that the SG U-tubes are covered. According to 10 CFR 50.36(a), the summary statement of the Bases of the specifications shall not become part of the TSs. During the review the NRC staff requested the licensee to justify those deviations from ISTS SR 3.4.6.1 identified above for ITS SR 3.4.6.2.

Inclusion of a Measurable Value in the ITS SR 3.4.6.2

In its response dated August 30, 2004, the licensee indicated that it agreed to include a measurable value in the proposed ITS SR 3.4.6.2 to be consistent with ISTS SR 3.4.6.1. In the ~~DC~~CNP, the SGs have three primary external elements: a lower cylindrical portion and head, a transition cone and the steam drum and head. The licensee indicated that the SG U-tubes are fully contained within the lower cylinder and transition cone. The value of 76% of the wide range instrument span specified in the CTS 4.4.1.3.3 (on pages 146 and 148 of Ref. 1) is based on the physical external intersection between the transition cone and the stem drum of SGs. Because this elevation is above the top of the SG tube bundle, the water level at this elevation

ensures that the U-tubes are covered with water. Using the lower tap of the SG wide range instrument as a zero reference point, the intersection between the transition cone and the steam drum of the SGs is at 420 inches for Unit 1 and 418.77 inches for Unit 2. Therefore, the licensee proposed to revise~~d~~ the ITS SR 3.4.6.2 (on pages 146 and 148 of Ref. 1), and its associated Bases (Insert 5 on page 166 of Ref.1) as follows:

> The phrase, "above the top of the U-tubes," will be replaced with "above the lower tap of the SG wide range level instrumentation by greater than or equal to 420 inches [Unit 1] and 418.77 inches [Unit 2].

The NRC staff finds that the proposed I~~S~~TS includes a measurable value that adequately reflects the elevation above the top of the U-tubes, and is consistent with ISTS SR 3.4.6.1 with respect to inclusion of a measurable value for the acceptable water level limit. Therefore, the NRC staff concludes that the changes are acceptable.

SG Water Level Measurement Instrumentation and Acceptable Water Level Limits

The licensee specified the actual instrumentation and the associated water level limit in Bases section of ITS SR 3.4.6.2. Specifically, the Bases (insert 6 on page 167 of Ref. 1) for the proposed ITS SR 3.4.6.2 state that "[t]he water level can be verified by either the wide range or narrow range instruments. A narrow rang instrument on scale ensures that the U-tubes are covered, since the instrumentation lower tap is at elevation above the top of the U-tubes. A value of being greater than or equal to 76% of the wide range instrument span also ensures that the U-tubes are covered." The NRC staff finds that the licensee's approach deviates from the corresponding I~~T~~STS SR 3.4.6.1 that includes the actual instrumentation in the specification section and requires use of the narrow range instrument only to measure the water level. The NRC staff requested the licensee to justify the ISTS deviations. In its response dated August 30, 2004, the licensee indicated that its approach is consistent with other sections of the ISTS (documented in NUREG-1431), since the ISTS have specified parameters to be met as a physical value, or range of values, and allow the inclusion of the actual instrumentation to be used to measure the parameters in the ISTS Bases sections. Examples of these types of parameters include containment pressure requirements (ISTS 3.6.4), containment air temperature requirements (ISTS 3.6.5) and refueling water storage tank volume and temperature requirements (ISTS 3.5.4).

The licensee also indicated that the wide range or narrow range instruments will be used for water level measurements. The wide range and narrow range SG level indications are provided by separated transmitters, with one wide range level channel level channel and three narrow range level channels per SG. These instruments have independent instrument loops. The wide range instrument has an independent lower tap and shares a common upper tap with one of the narrow range instruments.

Further, the licensee proposed to revise the I~~S~~TS SR 3.4.6.2 Bases by revising Insert 6 (on page 167 of Volume 9 in the attachment to the licensee's application). Those specific values in Insert 6 will be modified to be greater than or equal to 79% (increased from 76%) for the wide range instrument, or greater than or equal to 6% (changed from "on scale") for the narrow range instruments. The licensee indicated that the changes in the values of the SG level water limits reflect an increase in the measurement uncertainties based on a 24-month channel calibration frequency (extended from the 18-month frequency for the CTS).

Based on the licensee's response, the NRC staff agrees that although its approach in specifying the actual instrumentation and the associated water level limits in the Bases section of I~~S~~TS SR 3.4.6.2 deviates from the ISTS SR 3.6.4.1 for the SG water level requirements, it is consistent with the ISTS guidance that allows inclusion in the Bases sections of the ISTS for the requirements of many plant parameters, such as containment pressure, containment air temperature, and refueling water storage tank volume and temperature requirements. Also, since the wide range and narrow range instruments have independent instrument loops and the appropriated measurement uncertainties for the wide range and narrow range instruments are included in the SG water level limits to ensure that the SG U-tubes are covered, consistent with the C~~S~~TS Bases for maintaining an adequate SG heat removal capability, the NRC staff determines that the use of the wide range or narrow range instruments to measure the SG water level to meet the established water level limits is acceptable.

As discussed in Sections 1 and 2 above, the NRC staff finds that: (1) an appropriate measurable value for the SG water level is included in the proposed ITS SR 3.4.6.2; (2) the proposed I~~S~~TS is consistent with the ISTS guidance (documented in NUREG-1431), which allows that the requirements of many plant parameters are included in the Bases sections of the ISTS; and (3) the SG water limits to insure adequacy of the SG heat removal capability includes appropriate measurement uncertainties, and are consistent with the bases for the C~~S~~TS limits. Therefore, the NRC staff concludes that the proposed I~~S~~TS described in this section is acceptable.

G.1.9 Leak-Before-Break Methodology to the pressurizer surge line for Unit 1

G.1.9.a ITS 3.4.13, DOC M.1 (Unit 1 only)

CTS 3.4.6.2.b states that the Reactor Coolant System leakage shall be limited to 1 gpm UNIDENTIFIED LEAKAGE. CTS 3.4.6.2 Action b allows 4 hours to reduce leakage to within limits with any RCS leakage greater than any one of the limits, excluding pressure boundary leakage. Unit 1 ITS LCO 3.4.13.b states that the RCS unidentified LEAKAGE limit is 0.8 gpm. Unit 1 ITS 3.4.13 ACTION A states that if the unidentified leakage is > 0.8 gpm, to verify the source of unidentified LEAKAGE is not the pressurizer surge line or to reduce unidentified LEAKAGE to within limit in 4 hours. Unit 1 ITS 3.4.13 ACTION B states that if unidentified LEAKAGE is > 1.0 gpm, to reduce unidentified LEAKAGE to within limit within 4 hours. This changes the Unit 1 CTS by decreasing the unidentified LEAKAGE limit from 1 gpm to 0.8 gpm and provides additional Actions if the unidentified LEAKAGE is not within the new 0.8 gpm limit but ~~<~~≤ 1.0 gpm.

The purpose of CTS 3.4.6.2.b is to provide requirements for unidentified LEAKAGE. The change is acceptable because it is consistent with the condition for application of leak-before-break methodology to the pressurizer surge line for Unit 1 as documented in a Letter from the licensee to the NRC dated October 26, 2000 (Letter C1000-20). The change is designated as more restrictive because it reduces the unidentified LEAKAGE limit for Unit 1 and provides additional ACTIONS if the new unidentified LEAKAGE limit is not met for Unit 1.

[NRC evaluation to be provided later.]

G.1.9.b ITS 3.4.15, DOC M.2 (Unit 1 only)

CTS 3.4.6.1 Action requires a grab sample of the containment atmosphere to be obtained and analyzed at least once per 24 hours when the required gaseous and/or particulate radioactivity monitoring channels are inoperable. Unit 1 ITS 3.4.15 Required Action B.1.1 requires the same requirement at a 12 hour Frequency when no containment atmosphere particulate radioactivity monitoring channels are OPERABLE. This changes the Unit 1 CTS by adding the requirement to analyze grab samples of the containment atmosphere every 12 hours instead of every 24 hours.

The purpose of analyzing the grab samples of the containment atmosphere is to help ensure the RCS leakage has not increased since the last performance of the Surveillance. This change is consistent with a condition of approval for application of leak-before-beak methodology to the pressurizer surge line for Unit 1 when no containment atmosphere particulate radioactivity monitoring channels are OPERABLE (Letter from the licensee to the NRC dated October 26, 2000). This change is acceptable because the increased Frequency of the Required Action provides additional assurance that the RCS leakage has not increased significantly since the previous performance of the Surveillance. This change is designated as more restrictive, because it adds Required Actions to the Unit 1 CTS.

[NRC evaluation to be provided later.]

G.1.10 ITS 3.5.5, DOC M.1

~~**CTS 3.4.6.2.e Applicability Footnote * states that Specification 3.4.6.2.e is applicable with average pressure within "20" psi of the nominal full pressure value. CTS 4.4.6.2.1.c states that the seal line resistance shall be determined when the average pressurizer pressure is within "20" psi of its nominal full pressure value. The ITS SR 3.5.5.1 Note states that the Surveillance is not required to be performed until 4 hours after the pressurizer pressure stabilizes at > 2075 psig and < 2095 psig (Unit 1) and > 2225 psig and < 2245 psig (Unit 2). This changes the CTS by decreasing the pressure band from + 20 psi to + 10 psi. Other changes related to Footnote * are described in DOC A.3. In addition,**~~ CTS 4.4.6.2.1.c provides a pressure constant, PSI, ~~**to be used in the calculation**~~ of **2112 psig (low pressure operation) for Unit 1 and 2262 psig (high pressure operation) for Unit 1 and Unit 2 in the equation for determining** seal line resistance. The values for this constant (two values for Unit 1 and one value for Unit 2), which are moved to the Bases as described in DOC LA.2, have been increased and results in a decrease in the calculated seal line resistance at any given charging pump pressure. This changes the CTS by increasing the pressure constant value, resulting in a decrease in the calculated seal line resistance flow.

The purpose of CTS ~~**3.4.6.2.e and**~~ 4.4.6.2.1.c is to ensure seal line resistance is high enough to ensure the appropriate ECCS flows assumed in the LOCA analysis. This change effectively increases the seal line flow resistance limit due to the increase in the pressure constant. ~~**It also narrows the test pressure band that is required to be maintained.**~~ This change is based on the most recent seal line resistance calculation and is acceptable because it will slightly increase the overall ECCS borated water pumped into the RCS such that there would be an insignificant impact as a result. The change has been designated as more restrictive because it effectively increases the seal line flow resistance limit.

[NRC evaluation to be provided later.]

G.1.11 ITS 3.6.14, DOC L.2

CTS 3.6.5.8 states that "The refueling canal drains shall be OPERABLE." In this case, since there are three installed refueling canal drains, all three must be OPERABLE. ITS LCO 3.6.14 states "two refueling canal drains shall be OPERABLE." This changes the CTS by only requiring two of the three refueling canal drains to be OPERABLE. In addition, due to this change, the word "required" has been added to the Actions and the Surveillance Requirements since not all installed refueling drains are required to be OPERABLE.

The purpose of CTS 3.6.5.8 is to ensure the refueling canal drains are OPERABLE so that they can meet their design function. The design function of the refueling canal drains is to provide a main return path to the lower containment compartment for Containment Spray System water sprayed into the upper containment compartment. This change is acceptable because any two of the three refueling canal drains provide a sufficient flow rate of water to meet the analysis assumptions for ensuring sufficient containment recirculation sump water inventory following any accident that requires Emergency Core Cooling System swapover from the refueling water storage tank to the containment recirculation sump. Calculations performed conclude that three refueling canal drains provide a flow capacity of 2.1 times the flow rate of 5002 gpm assumed in the containment recirculation sump water inventory analysis. The most limiting combination of two refueling canal drains were calculated to provide a flow capacity of 6750 gpm, or approximately 1.35 times the analytically assumed flow rate of 5002 gpm. Therefore, the analysis of containment recirculation sump water inventory is not affected by the proposed reduction of OPERABLE refueling canal drains from three to two. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

NRC Staff Evaluation:

The refueling canal drains are passive, fairly large pipes, approximately 5 feet 8.75 inches long, located in the bottom of the refueling canal. Two of the refueling canal drains are a nominal 12 inches in diameter, and one is a nominal 10 inches in diameter. There is no assumption in the current licensing basis that requires evaluating the impact of one of the drains being blocked (the only possible failure mechanism that could occur). The single failure criteria is only applicable to failures of active components. In addition, in the CNP licensing basis the evaluation of a passive failure of the drains is specifically not required.

Containment Functional Design - Ice Condenser Containment

The ice condenser is designed to limit the containment pressure below the design pressure for all reactor coolant pipe beak sizes up to and included a double-ended severance. The CNP Updated Final Safety Analysis Report (UFSAR) Section 14.3.4.1.3.1.3, “Peak Containment Pressure Transient,” input assumption No. 9, states the following:

> "No ice condenser bypass is assumed. (This assumption depletes ice in the shortest time and is thus conservative.)"

Therefore, the analysis for the containment peak pressure is not affected by the proposed change to require only two of the three refueling canal drains OPERABLE because the drains are not considered in the analysis. The NRC staff agrees with the licensee that the containment

integrity analysis remains bounding because the loss-of-coolant accident (LOCA) analysis assumed no bypass of steam through the refueling canal drains.

The peak containment temperature transient, which results from a main steam line break (MSLB), is not dependent on the refueling canal drain flow area. The peak temperature occurs prior to the flow of containment spray water supplied by the refueling water storage tank. Therefore, the analysis of the containment peak temperature is not affected by the proposed change to require only two of the three refueling canal drains OPERABLE because the drains are not needed during the time frame of interest. The NRC staff agrees with the licensee that the containment integrity analysis remains bounding because the peak temperature for the MSLB analysis occurs before the CSS is actuated.

Equipment qualification analysis relies heavily on the peak temperature. The long term containment temperature transient will not be affected by the potential reduction in the refueling canal drain flow area because the current analysis (see Section 3.3, below) does not require all three of the refueling canal drains to be fully open to allow sufficient inventory to return to the lower volume. Therefore, the equipment qualification analyses will not be affected by the proposed change to require only two of the three refueling canal drains OPERABLE. The NRC staff agrees with the licensee that the equipment qualification analysis remains bounding because any two of the three refueling canal drains provide an adequate flow rate of containment spray water from the upper to the lower containment compartment to meet the analysis assumptions for ensuring sufficient containment recirculation sump water inventory following any accident that requires ECCS swapover from the refueling water storage tank to the containment recirculation sump (see Section 3.3, below).

The NRC staff finds there is reasonable assurance that, for the proposed change to require only two of the three refueling canal drains OPERABLE, CNP will continue to conform with GDC 4 as it relates to structures, systems, and components important to safety being designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents, including loss-of-coolant accidents; GDC 16 as it relates to the reactor containment and associated systems being designed to assure that containment design conditions important to safety are not exceeded for as long as postulated accident conditions require; GDC 38 as it relates to the containment heat removal system(s) function to rapidly reduce the containment pressure and temperature following any loss-of-coolant accident and maintain them at acceptably low levels; and GDC 50 as it relates to the reactor containment structure and associated heat removal system(s) being designed so that the containment structure and its internal compartments can accommodate the calculated pressure and temperature conditions resulting from any loss-of-coolant accident without exceeding the design leakage rate and with sufficient margin.

Containment Subcompartment Analysis

The limiting location for the short-term peak pressure consideration is a break in the lower containment loop subcompartment, which connects to the upper containment subcompartment through the refueling canal drains. The Transient Mass Distribution (TMD) computer program (Salvatori, R., “Ice Condenser Containment Pressure Transient Analysis Methods,” Proprietary Topical Report WCAP-8077, March, 1973, Non-Proprietary Topical report WCAP-8087, March, 1973.) was used by the licensee to evaluate the pressure loading on the containment subcompartments. TMD has been previously accepted by the NRC staff for subcompartment

analyses. An evaluation was performed by the licensee assuming that the two largest diameter refueling canal drains were blocked. This evaluation determined that the pressure in the break subcompartment would increase by approximately 0.042 psi, when compared to the reference case with all three refueling canal drains open. The licensee includes an uncertainty adder of 0.25 psi to the TMD results when evaluating the subcompartment loads. Therefore, this minor calculated increase in pressure is covered by the current evaluation and the subcompartment pressure analysis is not affected by the proposed change to require only two of the three refueling canal drains OPERABLE. The basis for the effect of a change in vent area is discussed in CNP UFSAR Table 14.3.4-36, "Sensitivity Studies for Cook Nuclear Plant." The evaluation that was performed by the licensee (referenced above) is contained within the CNP 10 CFR 50 Appendix B program as an approved calculation. The NRC staff agrees with the licensee that the subcompartment analysis remains bounding because the pressure differential resulting from closure of the two largest drains is small and the plant safety evaluation includes an uncertainly adder that is larger than this difference.

The NRC staff finds there is reasonable assurance that, for the proposed change to require only two of the three refueling canal drains OPERABLE, CNP will continue to conform with GDC 4, as it relates to the environmental and missile protection provided to assure that structures, systems and components important to safety are designed to accommodate the dynamic effects (e.g., effects of missiles, pipe whipping, and discharging fluids that may result from equipment failures) that may occur during plant normal operations or during an accident, and GDC 50, as it relates to the subcompartments being designed with sufficient margin to prevent fracture of the structure due to pressure differential across the walls of the subcompartment.

Containment Heat Removal

The purpose of CTS 3.6.5.8 is to ensure the refueling canal drains are OPERABLE so that they can meet their design function to provide a main return path to the lower containment compartment for CSS water sprayed into the upper containment compartment. The licensee has determined that this change is acceptable because any two of the three refueling canal drains provide an adequate flow rate of containment spray water from the upper to the lower containment compartment to meet the analysis assumptions for ensuring sufficient containment recirculation sump water inventory following any accident that requires ECCS swapover from the refueling water storage tank to the containment recirculation sump. Calculations performed by the licensee concluded that three refueling canal drains provide a flow capacity of 2.1 times the flow rate, 5002 gpm, assumed in the containment recirculation sump water inventory analysis. A calculation performed by the licensee with the most limiting combination of two refueling canal drains showed a flow capacity of 6750 gpm, or approximately 1.35 times the assumed flow rate of 5002 gpm.

The NRC staff agrees with the licensee that the analysis of the containment recirculation sump water inventory is not affected by the proposed change to require only two of the three refueling canal drains OPERABLE.

The NRC staff finds there is reasonable assurance that, for the proposed change to require only two of the three refueling canal drains OPERABLE, CNP will continue to conform with GDC 38 as it relates to the containment heat removal system being capable of reducing rapidly the containment pressure and temperature following a LOCA, and maintaining them at acceptably low levels.

Combustible Gas Control

The licensee has performed calculations with the Modular Accident Analysis Program (MAAP4) for CNP to address the distribution of hydrogen inside containment following a design basis accident, UFSAR Section 14.3.6, “Hydrogen in the Containment After a Loss-of-Coolant Accident.” In this evaluation, two flow paths model the connections between the lower containment node and the upper containment node. One of those paths represents the refueling canal drains, and the second path represent the ice condenser bypass. In the model, the total refueling canal drain flow area was set equal to 0 square feet. The CNP design documentation supporting this assumption states that the choice of 0 square feet area in the MAAP4 model is conservative for the subcompartment hydrogen analysis because the removal of hydrogen from the lower compartment (where the hydrogen would be released from the spilled reactor coolant) is minimized. The NRC staff agrees with the licensee that the closure of one of the refueling canal drains does not impact the CNP analysis for the hydrogen distribution.

The NRC staff finds there is reasonable assurance that, for the proposed change to require only two of the three refueling canal drains OPERABLE, CNP will continue to conform with GDC 41 as it relates to systems being provided to control the concentration of hydrogen or oxygen that may be released into the reactor containment following postulated accidents to assure that containment integrity is maintained.

Technical Specification Changes

The NRC staff has considered the less restrictive changes and the more restrictive changes proposed to the CNP CTS for the proposed change to require only two of the three refueling canal drains OPERABLE.

Less Restrictive Changes

CTS 3.6.5.8 states that "The refueling canal drains shall be OPERABLE." In this case, because there are three installed refueling canal drains, all three must be OPERABLE. ITS LCO 3.6.14 states "two refueling canal drains shall be OPERABLE." This changes the CTS by only requiring two of the three refueling canal drains to be OPERABLE. In addition, due to this change, the word "required" will be added to the Actions and the Surveillance Requirements because all of the installed refueling drains will not be required to be OPERABLE. The purpose of CTS 3.6.5.8 is to ensure the refueling canal drains are OPERABLE so that they can meet their design function to provide a main return path to the lower containment compartment for CSS water sprayed into the upper containment compartment. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

The NRC staff finds the proposal acceptable. The proposed change to require only two of the three refueling canal drains OPERABLE, as discussed in Section 3.3 above, has been shown by the licensee to have no impact on the CNP safety analyses.

More Restrictive Changes

ISTS SR 3.6.18.1 requires that each refueling canal drain be verified unplugged and free of debris every 92 days and prior to transition to MODE 4 from MODE 5 after each partial or complete fill of the refueling canal. The Surveillance Requirement (SR) also requires verification, at the same Frequencies, that no debris is present in the upper containment or refueling canal that could obstruct the refueling canal drains. ITS SR 3.6.14.1 will require verification that there is no debris present in the upper containment or refueling canal that could obstruct the required refueling canal drains every 92 days and prior to transition to MODE 4 from MODE 5 after each partial or complete fill of the canal. ITS SR 3.6.14.2 will require that each required refueling canal drain blind flange is removed and the drain is not obstructed by debris prior to transition to MODE 4 from MODE 5 after each partial or complete fill of the canal. The 92 day Frequency will not been included in ITS SR 3.6.14.2 for the verification that the required refueling canal drains are not plugged and are free of debris. The licensee proposed this change because the refueling canal drains are difficult to access during power operation because of their location in the bottom of the lower refueling canal, and performance of this verification would result in significant dose with little added benefit. The licensee based this assessment on the following factors:

a. The most likely time for debris to be introduced into containment is in MODES 5 and 6 or while defueled during outage activities. The Surveillance to verify the refueling canal drains are not plugged and free of debris and the Surveillance to verify the upper containment and refueling canal are free of debris will be performed after these activities prior to transition to MODE 4, as required by the ITS; and

b. After entry into MODE 4 and during operation in MODES 1 through 4, the new requirement to verify the upper containment and refueling canal are free of debris will be performed every 92 days.

The CNP CTS does not require a 92 day Frequency for verification of refueling canal drains; only the transitional Frequency is required, therefore the licensee has determined that the deletion of the 92 day Frequency is consistent with the current licensing basis.

The NRC staff agrees with the licensee evaluation concerning the deletion of the 92 day Frequency to verify the OPERABLE refueling canal drains are unplugged and the that proposed SR to verify the upper containment and refueling canal are free of debris provides reasonable assurance that the refueling canal drains will continue to provide their design basis function.

The NRC staff has reviewed the licensee's evaluation to address beyond scope issue (BSI) 3.6.14, "Containment Recirculation Drains," concerning the proposed change to require only two of the three refueling canal drains OPERABLE as described in the licensee's April 6, 2004 submittal, as supplemented in August 18, 2004 as ID 200407281703 in its Improved Technical Specification Licensing Database. Based on the above evaluation, the NRC staff has concluded that there is reasonable assurance the CNP will continue to conform to the applicable NRC requirements and that the refueling canal drains will continue to provide their design basis function to provide a main return path to the lower containment compartment for CSS water sprayed into the upper containment compartment.

G.1.12 ITS 3.7.6, DOC M.1

CTS 3.7.1.3 requires the CST to be OPERABLE with a minimum contained volume of 175,000 gallons of water. ITS LCO 3.7.6 requires the CST to be OPERABLE and ITS SR 3.7.6.1 requires the CST volume to be verified to be ¡Ý≥ 182,000 gallons. This changes the CTS by increasing the CST volume requirements.

The purpose of CTS 3.7.6, as described in the CTS Bases, is to ensure that there is sufficient water volume to meet the requirement to maintain the Reactor Coolant System in MODE 3 conditions for 9 hours with steam discharge to the atmosphere concurrent with a loss of offsite power. The current volume limit of 175,000 gallons does not satisfy this requirement, since a recent calculation has determined that there is an unusable volume of 43,665 gallons, which is more than was originally assumed. The new limit of 182,000 gallons will conservatively ensure the 9 hour requirement is met. This change is acceptable because it provides additional assurance that the CST will be capable of performing its function. This change is designated as more restrictive, because it increases the contained water volume requirements.

NRC Staff Evaluation:

CTS 3.7.1.3 requires that the CST shall be operable with a minimum contained volume of 175,000 gallons of water; however past calculations did not properly account for all of the unusable volume in the CST. The current volume limit of 175,000 gallons, as a result, is inadequate due to the newly calculated unusable volume totaling 43,665 gallons. Therefore, an increase in the minimum required CST level is needed to stay consistent with accident analysis assumptions. The licensee proposed ITS 3.7.6, which states that the CST shall be operable, and SR 3.7.6.1 requires the CST volume to be verified to be greater than or equal to 182,000 gallons of water. This new limit of 182,000 gallons will conservatively satisfy the criteria to provide sufficient water inventory to maintain the reactor coolant system in MODE 3 for 9 hours. Based on this, the NRC staff finds that the proposed increase in CST level is consistent with accident analysis assumptions and, therefore, the proposed increase is acceptable.

G.1.13 ITS 3.7.8, DOC M.3

CTS 3.7.4.1 Action b states that with the opposite unit in MODE 1, 2, 3, or 4 and any unit ESW pump inoperable, at least one crosstie valve on the associated header must be closed within 1 hour or the opposite unit ESW train must be declared inoperable and the appropriate action in the opposite unit's CTS 3.7.4.1 must be taken. The ITS does not include the allowance to delay declaring inoperable the opposite unit ESW train for 1 hour. ITS 3.7.8 requires an immediate declaration of inoperability of the opposite unit ESW train and to immediately take the Actions required by ITS 3.7.8 ACTION A. This changes the CTS by deleting the 1 hour allowance to delay declaring inoperable the opposite unit ESW train.

The purpose of the 1 hour time delay in CTS 3.7.4.1 Action b is to provide a short amount of time to close the crosstie valves prior to declaring the opposite unit ESW train inoperable. However, when the crosstie valves are open and one of the ESW pumps in the associated crosstied trains is inoperable, both the Unit 1 and the Unit 2 ESW trains that are crosstied are immediately inoperable. Thus delaying this declaration for 1 hour is not appropriate. The crosstie valves can be closed during the 72 hours provided in ITS 3.7.8 ACTION A to restore

the inoperable ESW train. This change is designated as more restrictive because it deletes an allowance to delay declaring inoperable the opposite unit ESW train for 1 hour.

NRC Staff Evaluation:

CTS 3.7.4.1 Action b states that with the opposite unit in MODE 1, 2, 3, or 4 and any unit ESW pump inoperable, at least one crosstie valve on the associated header must be closed within 1 hour or the opposite unit ESW train must be declared inoperable and the appropriate action in the opposite unit's CTS 3.7.4.1 must be taken. The licensee is proposing to change the CTS by deleting the one hour delay time for declaring inoperable the opposite unit ESW train. Initially, the 1 hour delay provided a short time to close the crosstie valves prior to declaring the opposite unit ESW train inoperable. However, when in this situation, the ESW train of the opposite unit is actually inoperable. The NRC staff finds that deleting this one hour delay time from CTS 3.7.4.1 is acceptable because it establishes a more restrictive requirement for the situation where an ESW pump is inoperable with the other unit operating in Modes 1, 2, 3, or 4. The crosstie valves can be closed during the 72 hours provided in ITS 3.7.8 ACTION A to restore the inoperable ESW train of the opposite unit.

G.1.14 <u>ITS 3.7.11, DOC M.2</u>

CTS 4.7.5.2 states "The control room air conditioning system shall be demonstrated OPERABLE at least once per 12 hours by verifying that the control room air temperature is less than or equal to 95°F." However, the CTS does not preclude the Surveillance from being performed with both control room air conditioning (CRAC) trains in operation, nor does the CTS require this verification for each of the control room air conditioning (CRAC) trains; the CTS Surveillance can be satisfied regardless of how many CRAC trains are in operation. ITS SR 3.7.11.1 requires the 12 hour Surveillance to be performed using only one of the two CRAC trains in operation, and requires the temperature to be ~~<~~≤ 85°F. ITS SR 3.7.11.2 requires verification that each CRAC train can maintain control room air temperature ~~<~~≤ 85°F every 31 days. This changes CTS by ensuring only one CRAC train is in operation and changing the temperature limit from 95°F to 85°F during the 12 hour Surveillance, and adding a specific requirement to verify that each CRAC train can maintain control room air temperature ~~<~~≤ 85°F every 31 days.

The purpose of CTS 4.7.5.2 is to provide assurance that each CRAC train has the capability to remove the assumed heat load in case of a DBA. This change is acceptable because it provides a better measure of whether each CRAC train can perform its safety function. The proposed 85°F temperature limit is consistent with the design of the CRAC System during normal operations. This change is designated as a more restrictive change because CTS 4.7.5.2 is replaced with a more comprehensive Surveillance Requirement.

The NRC staff reviewed the proposed change described above and consider the proposed change more conservative than the requirements in the ISTS. Specifically, the proposed change sets a temperature to be achieved within a designated period and requires that each train be capable of achieving the desired performance on a monthly basis. The NRC staff concludes that the proposed change enhances the overall safety system surveillance and is, therefore, acceptable.

G.1.15 ITS 3.7.13, DOC M.1

CTS LCO 3.9.12 requires the spent fuel storage pool exhaust ventilation system to be OPERABLE. CTS 3.9.12 Action a specifies the requirements when no spent fuel storage pool exhaust ventilation system is OPERABLE. CTS 4.9.12.d.3 requires verification that the spent fuel storage pool exhaust ventilation system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans. ITS 3.7.13 requires one FHAEV train to be OPERABLE "and in operation." ITS 3.7.13 ACTION A specifies the compensatory actions for a required FHAEV train that is not in operation. ITS SR 3.7.13.1 requires the verification that the required FHAEV train is operating every 12 hours. ITS SR 3.7.13.4 requires verification that the required FHAEV train actuates on an actual or simulated actuation signal. This changes the CTS by adding the requirement that the required FHAEV train must be in operation, adds an ACTION to take if the required FHAEV train is not in operation (ITS 3.7.13 ACTION A), adds a new Surveillance Requirement to periodically verify the required FHAEV train is in operation, and deletes a Surveillance Requirement to verify the train automatically directs its exhaust flow through the charcoal adsorber banks on an actuation signal.

The purpose of CTS 3.9.12 is to ensure the FHAEV System is OPERABLE such that it meets its design safety function. Upon receipt of a high radiation signal in the area of the spent fuel pool the bypass valves around the charcoal filter section receive a close signal to ensure the exhaust flow passes through the charcoal filter section. In addition, the fuel handling supply fans trip upon receipt of the same high radiation signal. However, the FHAEV System fans do not start on receipt of a signal. Therefore, the fuel handling accident analysis assumes one train of the FHAEV System is operating prior to the accident. In addition, it has been determined that the bypass valves do not close fast enough to prevent all of the radioactive gases from a fuel handling accident from being released to the atmosphere without being passed through the charcoal filters assumed by the off site dose calculations. Therefore, the term "in operation" requires all charcoal filter section bypass valves to be closed. This change is acceptable because it will help ensure the FHAEV System is in a condition to mitigate the consequences of a fuel handling accident. The change has been designated as more restrictive because it requires one train of the FHAEV System to be operating.

The NRC staff reviewed the proposed change described above and considers the proposed change more conservative than the requirements in the ISTS. The ISTS would require that two trains of the FHAEV system be operable. The licensee proposes for the C~~ook~~NP ITS to require that one train of the FHAEV be operable and in operation with an appropriate action to be taken and surveillance to be performed to assure that the system is in operation. The additional requirement designated as DOC M.1 for one train to be in operation with the identified ACTION and surveillance is conservative and provides greater assurance that a FHAEV system will be available during fuel movement activities. Based on this, the NRC staff concludes that the proposed change is acceptable. The difference between the ISTS which requires two FHAEV trains to be operable and the proposed ITS which requires one train to be operable and operating is addressed in Administrative Change ITS 3.7, DOC A.4.

G.1.16 ITS 3.8.1, DOC M.5

CTS 4.8.1.1.2.a.4, the normal DG start test, requires a verification that each DG starts from standby conditions and achieves in less than or equal to 10 seconds, a voltage of 4160 ± 420 V

and a frequency of 60 **±** 1.2 Hz. CTS 4.8.1.1.2.a.4 footnote * clarifies that the DG start (10 seconds) from standby conditions shall be performed at least once per 184 days in these surveillance tests. All other engine starts for the purpose of this Surveillance testing and compensatory action may be at reduced acceleration rates as recommended by the manufacturer so that mechanical stress and wear on the DG are minimized. CTS 4.8.1.1.2.e.2, the single largest load reject test, requires the verification of the generator capability to reject a load greater than or equal to the specified value while maintaining voltage at 4160 **±** 420 V and frequency of 60 **±** 1.2 Hz. CTS 4.8.1.1.2.e.4, the simulated loss of offsite power test, and CTS 4.8.1.1.2.e.6, the simulated loss of offsite power test in conjunction with a Safety Injection signal test, also specify a steady state voltage of 4160 **±** 420 V and frequency of 60 **±** 1.2 Hz. CTS 4.8.1.1.2.e.7 requires the performance of CTS 4.8.1.1.2.a.4 within 5 minutes after performing the 8 hour test (commonly called a hot restart test). CTS 4.8.1.1.2.a.4 is divided into three Surveillances in the ITS. ITS SR 3.8.1.2 requires the verification that each DG starts from standby conditions and achieves steady state voltage of ~~>~~**≥** 3910 V and ~~<~~**≤** 4400 V and frequency of ~~>~~**≥** 59.4 Hz and ~~<~~**≤** 61.2 Hz. ITS SR 3.8.1.2 Note 2 specifies that the modified DG start involving gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. ITS SR 3.8.1.8, the 184 day quickstart test, and SR 3.8.1.16, the 24 month hot restart test, require a steady state voltage of ~~>~~**≥** 3910 V and ~~<~~**≤** 4400 V and a steady state frequency of ~~>~~**≥** 59.4 Hz and ~~<~~**≤** 61.2 Hz. ITS SR 3.8.1.10, the single largest load reject test, requires the verification that within 2 seconds following load rejection voltage is ~~>~~**≥** 3910 V and ~~<~~**≤** 4400 V and frequency is ~~>~~**≥** 59.4 Hz and ~~<~~**≤** 61.2 Hz. ITS SR 3.8.1.12, the loss of offsite power test, and SR 3.8.1.19 the loss of offsite power test in conjunction with an ESF signal, also require verification of the same limitations for steady state voltage and frequency. This changes the CTS in that the steady state voltage range has been reduced from 4160 **±** 420 V to 4160 +240 V, -250 V and the steady state frequency range has been reduced from 60 **±** 1.2 Hz to 60 + 1.2 Hz, -0.6 Hz. The deletion of the maximum voltage and frequency limit for the quick start tests are described in DOC L.18.

The purpose of the CTS 3.8.1.1 Surveillances is to provide the appropriate limitations for DG voltage and frequency. This change reduces the steady state voltage and frequency range. The more restrictive steady state voltage and frequency limits provide assurance that the ~~emergency~~**engineered** safety features (ESF) pumps have the appropriate level of voltage and frequency available so that they are assured of achieving adequate fluid flow to meet their safety and accident mitigation functions. The maximum voltage limit also provides a 10% voltage allowance for the 4000 V rated motors. This change is designated as more restrictive because the proposed limits for voltage and frequency have been reduced.

[NRC evaluation to be provided later.]

G.1.17 <u>ITS 3.8.1, DOC L.19</u>

CTS 4.8.1.1.2.a.3 requires that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank. The test Frequency for these Surveillance is in accordance with the frequency specified in Table 4.8-1 (the DG Test Schedule Table) on a STAGGERED TEST BASIS. The nominal test Frequency in CTS Table 4.8-1 is 31 days. ITS SR 3.8.1.6 requires the verification that the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tank every 92 days. This changes the CTS by deleting the requirement to perform this Surveillance in accordance with the DG Test Schedule

Table, and changes the nominal test Frequency to 92 days. The change to the STAGGERED TEST BASIS requirement is discussed in DOC L.4.

The purpose of CTS 4.8.1.1.2.a.3 is to ensure the fuel oil transfer system can function properly. A detailed review of the test history for the fuel oil transfer pumps indicates no failures during any demand cycles. The **Inservice Testing (**IST) ~~p~~**Program** requires operation of the transfer pumps only on a quarterly basis and degradation has not been indicated for these pumps. The change concerning the deletion of more frequent testing than the nominal 31 day test Frequency is acceptable because the DG failures that result in a more frequent DG test Frequency have no impact on the ability of the fuel oil transfer pumps to perform their intended function. In addition, the proposed 92 day fuel oil transfer pump test Frequency is consistent with the requirements of ASME Operation and Maintenance Standards and Guides (OM Codes) for similar pumps. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

NRC Staff Evaluation:

CTS 4.8.1.1.2 requires that the emergency diesel fuel transfer pumps can be started and transfer fuel from the fuel storage system to the day tank. The test frequency for the surveillance of the fuel transfer pumps is in accordance with the Diesel Generator Test Schedule Table, located in the CTS, and is on a staggered test basis. Currently, the nominal frequency of testing is every 31 days. The licensee is proposing to change the CTS surveillance requirement (SR) of testing the fuel transfer pumps from a frequency of 31 days to a frequency of 92 days. Specifically, proposed SR 3.8.1.6 will require verification that the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tank every 92 days. The licensee considers the proposed less restrictive SR 3.8.1.6 to be acceptable because it is in accordance with the current ~~Inservice Testing (~~IST~~)~~ Program which requires quarterly testing, and it is consistent with the requirements of the American Society of Mechanical Engineers (ASME) Operation and Maintenance Standards and Guides (OM Codes) for similar pumps. The NRC staff concludes that compliance with the licensee's IST Program and the ASME OM Codes will provide adequate assurance that the fuel transfer pumps are able to perform their function. Based on that, the NRC staff further concludes that the proposed change is acceptable.

G.1.18 ~~**ITS 3.8.1, DOC L.20**~~ **Deleted**

~~**CTS 4.8.1.1.2.e.10 requires verifying that with the DG operating in a test mode while connected to its test load, a simulated Safety Injection (SI) signal overrides the test mode by returning the DG to standby operation and ensuring the emergency loads remain powered by offsite power. The ITS does not include this Surveillance Requirement. This changes the CTS by deleting this Surveillance Requirement.**~~

~~**The purpose of CTS 4.8.1.1.2.e.10 is to verify the design of the DG logic when the DG is connected to the test bank. The DCC design includes the capability of paralleling the DG with a test bank instead of actually paralleling the DG with offsite power (i.e., via the emergency buses). However, the test bank only provides a capability to load the DG to approximately 50% of the rating of the DG (i.e., 1690 kW). With the exception of a single Surveillance (CTS 4.8.1.1.2.e.2), all DG loading Surveillances require the DG to be loaded to greater than the rating of the test bank. Thus, the test bank is not allowed to be used**~~

~~to meet these Surveillances. In the ITS, the DG loading required for these Surveillances will also remain greater than the capability of the test bank. CTS 4.8.1.1.2.e.2, the Surveillance that does not require the DG to be loaded greater than the rating of the test bank, is a test of the DGs capability to reject a load equivalent to the single largest post-accident load. Since this test is normally performed in conjunction with the full load rejection test (CTS 4.8.1.1.2.e.3), the load bank is not used for the test and the DG is normally paralleled with offsite power. In addition, CTS 4.8.1.1.2.e.2 is required to be performed while shutdown and ITS SR 3.8.1.10 maintains this requirement (i.e., it cannot be performed in MODES 1 and 2). Thus, even if this test were performed using the test bank, the unit would not be critical. Furthermore, this change is only requesting the removal of the requirement to test this design feature from the CTS and will not result in physically removing the feature from the DG logic. Therefore, this change is acceptable since the CTS Surveillance verifies a design feature that cannot be used to meet the requirements for the vast majority of the CTS Surveillances, and the one Surveillance the design feature can be used for is not normally performed using the test bank. This change is designated as less restrictive because a Surveillance Requirement has been deleted from the CTS.~~

~~[NRC evaluation to be provided later.]~~

G.1.19 <u>ITS 3.8.1, DOC L.21</u>

CTS 3.8.1.1 Action b specifies the compensatory actions for one inoperable DG and CTS 3.8.1.1 Action c specifies the compensatory actions for one inoperable offsite circuit and one inoperable DG. The Actions include a requirement to demonstrate the OPERABILITY of the remaining OPERABLE DG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless the absence of any potential common mode failure for the remaining DG is demonstrated. ITS 3.8.1 Required Actions B.3.1 and B.3.2 allows ~~12~~**24** hours to perform similar checks on the remaining OPERABLE DGs. This changes the CTS by extending the time to perform these checks from 8 hours to ~~12~~**24** hours.

The purpose of the above specified CTS Actions is to ensure that the other unit DG is not inoperable as a result of a similar, yet undetected, failure (i.e., due to a common mode failure). Currently, the 8 hour time limit specified is sufficient to actually perform CTS 4.8.1.1.2.a.4, a normal DG start test, on the other unit DG. However, due to the addition of the opposite unit DG requirements discussed in DOC M.2, there is a possibility that ITS 3.8.1 ACTION B will be entered due to an opposite unit DG inoperability. This could result in ITS 3.8.1 Required Action B.3.2 being required on two unit DGs. That is, the DG start test could have to be performed on two DGs. Based on Operations Department experience, it would be difficult to perform a DG start test on two DGs within the current 8 hour time limit, considering the time it normally takes to perform the test on a single DG, as well as to perform pre-evolution briefs for the operating crew and to safely transition between the DG tests. The proposed ~~12~~**24** hour time limit is considered a reasonable time to complete the DG start tests on two DGs. Generic Letter 84-15 identified that a 24 hour time limit was acceptable to perform these common mode failure checks. ~~Since the 12 hour time limit being proposed is within the 24 hour limit allowed by the NRC in Generic Letter 84-15, the change is considered acceptable.~~ In addition, the change is considered acceptable since the vast majority of DG start tests demonstrate that the DG is in fact OPERABLE.

[NRC evaluation to be provided later.]

G.1.20 ITS 3.8.2, DOC L.6

CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5. ITS SR 3.8.2.1 has included this allowance in the Note to SR 3.8.2.1 (see DOC L.2). However, additional ITS SRs are excepted from being required to be met. ITS SR 3.8.2.1 states, in part, that the following SRs are not required to be met: SR 3.8.1.13, SR 3.8.1.14 (ESF actuation signal portion only)**, SR 3.8.1.19, SR 3.8.1.20,** and SR 3.8.1.~~19~~**21**. This changes the CTS by not requiring certain Surveillances to be met. Further changes to CTS 3.8.1.2 are discussed in DOC L.3.

The purpose of CTS 4.8.1.2 is to ensure the appropriate AC Sources are demonstrated to be OPERABLE. This change is acceptable because the deleted Surveillance Requirements are not necessary to verify that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner and at a Frequency necessary to give confidence that the equipment can perform its assumed safety function. This change deletes certain Surveillances from being required to be met. These Surveillances are CTS 4.8.1.1.2.e.5 (ITS SR 3.8.1.13), the Safety Injection actuation test, CTS 4.8.1.1.2.e.6.c (ITS SR 3.8.1.14), the bypass of automatic trips test (ESF actuation signal portion only), ~~and~~ CTS 4.8.1.1.2.e.6 (ITS SR 3.8.1.19), the loss of offsite power in conjunction with a Safety Injection actuation test**, and CTS 4.8.1.1.2.e.10 (ITS SR 3.8.1.20), the DG test mode override on a Safety Injection signal test**. SR 3.8.1.13, SR 3.8.1.14 (ESF actuation signal portion only), **SR 3.8.1.19,** and SR 3.8.1.~~19~~**20** are not required to be met because the ESF actuation signal is not required to be OPERABLE, as indicated in the Surveillance Requirements in ITS 3.3.2. The CTS and ITS also do not require the ECCS subsystem(s) to be OPERABLE in MODES 5 and 6. The DGs are required to support the equipment powered from the emergency buses. However, when the ECCS subsystem(s) are not required to be OPERABLE, then there is no reason to require the DGs to autostart on an ESF initiation signal. In addition, the ESF actuation signal is only an anticipatory start signal; the DGs are only needed during a LOCA if a loss of offsite power occurs concurrently. The DGs are also required to autostart if a loss of offsite power occurs. The requirement to autostart the required DG(s) on a loss of offsite power signal is being maintained in the ITS (ITS SR 3.8.1.12). Thus, when in these conditions (associated ECCS subsystem(s) not required to be OPERABLE), there is no reason to require the DGs to be capable of automatically starting on an ESF actuation signal (either by itself or concurrent with a loss of offsite power signal). **ITS SR 3.8.1.21 is also not required to be met. This test was added to AC Sources-Operating and requires the DG test mode to override when the DG is connected to the emergency bus on a Safety Injection signal test. This test is not required to be met because the ESF actuation signal is not required t be OPERABLE. Since ITS SR 3.8.1.21 is a new test not requiring it to be met is considered an administrative change and is discussed here for convenience.** This change is designated as less restrictive because Surveillance Requirements have been deleted from the CTS.

[NRC evaluation to be provided later.]

G.1.21 Surveillance Frequencies being extended to 24 months described in the following:

ITS 3.1.4, DOC L.9
ITS 3.3.1, DOCs L.1, L.2, L.3, and L.11
ITS 3.3.2, DOCs ~~L.1,~~ L.2, L.4, and L.13
ITS 3.3.3, DOC L.6
ITS 3.3.4, DOC L.1
ITS 3.3.6, DOCs L.5 and L.6
~~ITS 3.3.7, DOC L.2~~
ITS 3.3.8, DOC L.3
ITS 3.4.1, DOC L.2
ITS 3.4.9, DOC L.1
ITS 3.4.11, DOC L.3
ITS 3.4.12, DOC L.3
ITS 3.4.14, DOC L.4
ITS 3.4.15, DOC L.6
ITS 3.5.2, DOC L.3
ITS 3.6.3, DOC L.5
ITS 3.6.6, DOC L.1
ITS 3.6.7, DOC L.1
ITS 3.6.8, DOC L.3
ITS 3.6.9, DOC L.2
ITS 3.6.13, DOC L.1
ITS 3.7.5, DOC L.8
ITS 3.7.7, DOC L.2
ITS 3.7.8, DOC L.2
ITS 3.7.10, DOC L.2
ITS 3.7.12, DOC L.2
ITS 3.7.13, DOC L.4
ITS 3.8.1, DOC L.3
ITS 3.8.4, DOC L.2
ITS 3.9.2, DOC L.4
ITS 5.5, DOCs L.1 and L.3

[NRC evaluation to be provided later.]

G.2 Additional BSI Changes identified by the NRC staff:

G.2.1 ITS 3.3.1, DOC L.~~12~~**14**

CTS Table 3.3-1 Functional Unit 1**, including Note 1,** ~~specifies the requirements for~~ **requires the performance of a CHANNEL FUNCTIONAL TEST of** the Manual Reactor Trip ~~channels~~**Function prior to each reactor startup if not performed in the previous 7 days**. ~~The CTS requirement specifies that Action 12 applies with the number of channels OPERABLE one less than required by the minimum channels OPERABLE requirement. CTS Table 3.3-1 Action 12 requires the restoration of the inoperable channel to OPERABLE status within 48 hours or to be in MODE 3 within the next 6 hours and/or open the reactor trip breakers. ITS Table 3.3.1-1 Function 1 requires entry in ITS 3.3.1 ACTION B if a required channel is inoperable. ITS 3.3.1 Required Action B.1 requires restoration of the channel to OPERABLE status within 48 hours. If this cannot be met in MODE 1 and 2, ACTION P must be entered and Required Action P.1 requires the unit to be in at least MODE 3 within 6 hours. If the inoperable channel cannot be restored to OPERABLE status in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted, ACTION Q must be entered and Required Action Q.1 requires the immediate initiation of action to fully insert all rods and Required Action Q.2 requires the Rod Control System to be in a condition incapable of rod withdrawal within 1 hour. This changes the CTS by not specifically requiring the reactor trip breakers to be opened and providing 1 additional hour to ensure the Rod Control System is incapable of rod withdrawal.~~**CTS Table 4.3-1 Functional Unit 23, including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST of each Reactor Trip Bypass Breaker prior to each reactor startup if not performed in the previous 7 days. ITS SR 3.3.1.17 requires the performance of an equivalent TRIP ACTUATING DEVICE OPERATIONAL TEST to be performed every 24 months. This**

changes the CTS by changing the Surveillance Frequency from prior to each reactor startup if not performed in the previous 7 days to 24 months.

~~**The purpose of CTS Table 3.3-1 Action 12 is allow time to restore an inoperable channel and if not, to place the unit in a condition where the equipment is not required to be OPERABLE. This change is acceptable because the Required Actions are used to establish remedial measures that must be taken in response to the degraded conditions in order to minimize risk associated with continued operation while providing time to repair inoperable features. The Required Actions are consistent with safe operation under the specified Condition, considering the OPERABLE status of the redundant systems or features. This includes the capacity and capability of remaining systems or features, a reasonable time for repairs or replacement, and the low probability of a DBA occurring during the repair period. This change deletes the requirement to open the reactor trip breakers. The proposed Required Action ensures the unit is outside of the Applicability of the Manual Reactor Trip channels. The Required Actions require immediate action to insert all rods and, once inserted, the Rod Control System must be placed in a condition incapable of rod withdrawal within 1 hour, which is the purpose of opening the reactor trip breakers. This is normally performed by opening the reactor trip breakers.**~~**The purpose of the CTS Table 4.3-1 CHANNEL FUNCTIONAL TEST requirement is to ensure the Manual Reactor Trip and the Reactor Trip Bypass Breaker Functions are OPERABLE. This change is acceptable because the new Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. If a unit operates a complete cycle without requiring a shutdown, this Surveillance will only be performed once per cycle (approximately 18 months). Testing these channels once per cycle is considered acceptable. A review of the Surveillance test history for the Manual Reactor Trip and Reactor Trip Bypass Breaker Functions indicates that an extension to 24 months is acceptable.** This change is designated as less restrictive because ~~**less stringent Required Actions are being applied in**~~**Surveillances will be performed less frequently under** the ITS than ~~**were applied in**~~**under** the CTS.

[NRC evaluation to be provided later.]

G.2.2 <u>ITS 3.3.1, DOC M.10</u>

CTS Table 4.3-1 requires a CHANNEL CALIBRATION of Functional Units 7 and 8, the Overtemperature ΔT and Overpower ΔT channels, respectively. CTS Table 4.3-1 Note 9 modifies these CHANNEL CALIBRATION requirements, and specifies, in part, that the provisions of Specification 4.0.4 are not applicable for measurement of delta T. ITS Table 3.3.1-1 Functions 6 and 7 require the performance of ITS SR 3.3.1.15, a CHANNEL CALIBRATION for the Overtemperature ΔT and Overpower ΔT channels. ITS SR 3.3.1.15 is modified by a Note (Note 2) that states that normalization of the ΔT is not required to be performed until 72 hours after THERMAL POWER is ~~>~~**≥** 98% RTP. This changes the CTS by restricting the application of CTS 4.0.4 for measurement of delta T by requiring the performance of the Surveillance no later than 72 hours after THERMAL POWER is ~~>~~**≥** 98% RTP.

The purpose of the CTS 4.0.4 exception is to allow the unit to enter the MODE of Applicability of the Overtemperature ΔT and Overpower ΔT channels without completing the normalization of ΔT. The change explicitly specifies that the normalization of ΔT channels is not required to be

performed until 72 hours after THERMAL POWER is ~~>~~**≥** 98% RTP. **The Note allows entry into MODES 1 and 2 without performing the normalization of ΔT portion of the CHANNEL CALIBRATION since normalization should be performed as close to rated conditions as possible. Performing the normalization at a lower condition (i.e., < 98% RTP) will not provide the required accuracy to meet the assumptions in the Allowable Value calculations.** This change is acceptable since the proposed Surveillance is consistent with the intent of the current allowance and ensures the normalization of ΔT is performed within a reasonable period of time after the unit is in the condition to perform the normalization. The 72 hours is necessary for unit conditions to stabilize, obtain the appropriate data, perform calculations, and perform the actual normalization. This change is designated as more restrictive since the added Note explicitly states that the only portion of the CHANNEL CALIBRATION of the Overtemperature ΔT and Overpower ΔT channels that can be performed after entering the MODE of Applicability is the normalization of ΔT and that the normalization must be performed within 72 hours after achieving 98% RTP.

NRC Staff Evaluation:

In ~~DC~~C**NP** 1/2 ITS 3.3.1 "Reactor Trip System (RTS) Instrumentation," the licensee proposed to add Note 2 to SR 3.3.1.15 regarding Channel Calibration of reactor trip functions 6 and 7, Overtemperature ΔT (OTΔT) and Overpower ΔT (OPΔT), respectively. This note states that "Normalization of the ΔT is not required to be performed until 72 hours after THERMAL POWER is * 98% RTP," which deviates from the WOG **I**STS. The licensee provided "Justification for Deviations," indicating that Note 2 reflects CNP CTS allowances and current practices, since Notation 9 in CTS Table 4.3-1 states that "the provisions of Specification 4.0.4 are not applicable for measurement of delta T."

In response to a staff RAI, the licensee clarified that the intent of Note 2 in ITS SR 3.3.1.15 is to accommodate performing the precision calorimetric, which is typically performed between 97% and 98% RTP and determines the RTP value against which ΔT is normalized. Although 98% RTP is the typical upper limit on reactor power that is maintained during the precision calorimetric, some operating margin is needed to allow for possible small excursions above 98% during the testing. Therefore, it is not the intent of the allowance in Note 2 for the operators to indiscriminately increase power above a nominal 98% RTP until the ΔT normalization is complete. The licensee also revised ITS Bases for SR 3.3.1.15 to state that the intent of Note 2 is to maintain reactor power at a nominal 97% to 98% RTP until the ~~*T~~**ΔT** normalization is complete before increasing reactor power to 100% RTP.

The licensee explained that the procedural guidance (i.e., procedures for "Zero Power And Power Ascension Tests for Post-Refueling Startups" and "Evaluation of ~~of~~ Normalized Delta T % Power") for performing the initial ΔT normalization of SR 3.3.1.15 following startup ensures that reactor power not be increased above 98% RTP if the ΔT normalization reveals any channel or channels below -1% RTP or above +3% RTP. In fact, the procedural guidance directs that reactor power be reduced at least by the amount of the negative deviation from reactor RTP, based upon the initial ΔT normalization check, until the ΔT normalization is complete and within acceptable limits. This power reduction provides additional margin for the OTΔT and OPΔT trip functions.

The licensee also stated that, based on the recent history of reactor startup of both CNP units, the OT~~*T~~**ΔT** and OP~~*T~~**ΔT** channels are very stable regarding ΔT normalization with the

calculated average change for both units of 0.68% and the largest change of 1.45%. Based on these average changes, maintaining reactor power at a nominal 97-98% RTP during the ΔT channel normalization ensures that the actual OTΔT and OPΔT trip setpoints are conservative to the safety analysis limits. In addition, the channel calibration performed through SR 3.3.1.15 during the refueling outage preceding ΔT normalization would eliminate the OTΔT and OPΔT channel instrumentation rack drift, which accounts for recovery in uncertainties of approximately 0.4% ΔT span, or approximately 0.6% RTP. Therefore, there would only be a relatively small increase in total channel statistical uncertainty due to the 72-hour delay in the ***~~T~~ΔT** normalization.

Based on the above discussions regarding the intent of NOTE 2 , the procedural guidance regarding initial ΔT normalization, and a relatively small increase in OTΔT and OPΔT trip function uncertainties, the NRC staff concludes that the proposed Note 2 in ITS SR 3.3.1.15 is technically justified and, therefore, acceptable.

G.2.3 ITS 3.3.1, DOC M.14

CTS Table 4.3-2 Functional Units 18.A and 18.B specify the Surveillance Requirements for the Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Functions and do not include a CHANNEL CALIBRATION requirement. ITS SR 3.3.1.13 has been added which requires a CHANNEL CALIBRATION of these channels every 24 months (ITS Table 3.3.1-1, Functions 16.a and 16.b). This changes the CTS by adding a CHANNEL CALIBRATION requirement for the Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Functions every 24 months.

This change is acceptable because it ensures the Allowable Values for the Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Trip Functions are consistent with the plant setpoint methodology**, and the CHANNEL CALIBRATION Frequency (24 months) is consistent with the Frequency assumed in the calculations performed using the plant setpoint methodology.** This change is designated as more restrictive since a new Surveillance Requirement has been added to the Turbine Trip Functions.

[NRC evaluation to be provided later.]

G.2.4 ITS 3.3.2, DOC M.2

CTS Table 4.3-2 Functional Unit 5, which provides the Surveillance Requirements for the Turbine Trip and Feedwater Isolation instrumentation, does not include an Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 5.a requires the two Automatic Actuation Logic and Actuation Relays trains to be OPERABLE and requires the performance of ~~**SR 3.3.2.2, an ACTUATION LOGIC TEST, and SR 3.3.2.4, a MASTER RELAY TEST, every 92 days on a STAGGERED TEST BASIS, and**~~ SR 3.3.2.8, a SLAVE RELAY TEST, every 24 months. This changes the CTS by adding the explicit Surveillance~~**s**~~ **for a SLAVE RELAY TEST every 24 months** for proposed Function 5.a, Automatic Actuation Logic and Actuation Relays, to the TSs.~~ **The addition of the LCO, number of channels, and ACTIONS is discussed in DOCs A.12 and L.8.**~~

This change is acceptable because the Automatic Actuation Logic and Actuation Relays Function is required to support the OPERABILITY of Turbine Trip and Feedwater Isolation

function. As such, explicitly including requirements for the Automatic Actuation Logic and Actuation Relays Function in the TSs provides additional assurance that the OPERABILITY of the Turbine Trip and Feedwater Isolation function will be maintained. The change provides explicit requirements for testing the Automatic Actuation Logic and Actuation Relays Function (ITS Table 3.3.2-1 Function 5.a). The addition of ~~**SR 3.3.2.2 (an ACTUATION LOGIC TEST), SR 3.3.2.4 (a MASTER RELAY TEST), and**~~ SR 3.3.2.8 (a SLAVE RELAY TEST) is acceptable since the proposed Surveillance Requirement~~**s are**~~ **is** consistent with current practice. ~~**The proposed Frequencies of testing of the actuation logic and master relays is consistent with the current Frequency of testing of the CHANNEL FUNCTIONAL TEST associated with the Automatic Actuation Logic and Actuation Relays for other Functions.**~~ The Frequency proposed for the slave relays is consistent with the Frequency proposed for the simulated actuation tests. This change is designated as more restrictive because it adds SRs for the Automatic Actuation Logic and Actuation Relays Function to the CTS.

[NRC evaluation to be provided later.]

G.2.5 <u>ITS 3.3.2, DOC M.3</u>

CTS Table 4.3-2 Functional Unit 6, which provides the ESFAS instrumentation Surveillance Requirements for the motor driven AFW Pumps, and CTS Table 4.3-2 Functional Unit 7, which provides the ESFAS instrumentation Surveillance Requirements for the turbine driven AFW pump, do not provide any explicit requirements for the motor driven or turbine auxiliary feedwater (AFW) pump ESFAS Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 6.a requires the two Automatic Actuation Logic and Actuation Relays (Solid State Protection System) trains to be OPERABLE and requires the performance of ~~**SR 3.3.2.2, an ACTUATION LOGIC TEST, and SR 3.3.2.4, a MASTER RELAY TEST, every 92 days on a STAGGERED TEST BASIS, and**~~ SR 3.3.2.8, a SLAVE RELAY TEST, every 24 months. ITS Table 3.3.2-1 Function 6.b requires the two Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) trains to be OPERABLE and requires the performance of SR 3.3.2.11, an ACTUATION LOGIC TEST, every 24 months. This changes the CTS by adding the explicit Surveillances **at a 24 month Frequency** for proposed Functions 6.a, Auxiliary Feedwater (AFW) Automatic Actuation Logic and Actuation Relays (Solid State Protection System) and 6.b, AFW Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) to the TSs. ~~**The addition of the LCO, number of channels, and ACTIONS is discussed in DOCs A.13 and L.17.**~~

This change is acceptable because the Automatic Actuation Logic and Actuation Relays Functions are required to support the OPERABILITY of other AFW System instrumentation Functions. As such, explicitly including requirements for the Automatic Actuation Logic and Actuation Relays Functions in the TSs provides additional assurance that the OPERABILITY of the other AFW System instrumentation Functions will be maintained. The change provides explicit requirements for testing the AFW Automatic Actuation Logic and Actuation Relays (Solid State Protection System) Function (ITS Table 3.3.2-1 Function 6.a) and the AFW Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) Function (ITS Table 3.3.2-1 Function 6.b). The addition of ~~**SR 3.3.2.2 (an ACTUATION LOGIC TEST), SR 3.3.2.4 (a MASTER RELAY TEST),**~~ SR 3.3.2.8 (a SLAVE RELAY TEST)~~**,**~~ and SR 3.3.2.11 (an ACTUATION LOGIC TEST) is acceptable since the proposed Surveillance Requirements are consistent with current practice. ~~**The proposed Frequencies of testing of the actuation logic**~~

~~and master relays associated with the Solid State Protection System is consistent with the Frequency of testing of the CHANNEL FUNCTIONAL TEST associated with the Automatic Actuation Logic for other Functions.~~ The Frequency proposed for the ~~slave relays and the~~ balance of plant ESFAS ACTUATION LOGIC TEST is consistent with the Frequency proposed for the simulated actuation tests. **The Frequency proposed for the slave relays is consistent with the Frequency for current testing requirements for the simulated actuation tests.** This change is designated as more restrictive because it adds explicit OPERABILITY requirements and SRs for the AFW Automatic Actuation Logic and Actuation Relays Functions to the CTS.

[NRC evaluation to be provided later.]

G.2.6 ~~ITS 3.3.2, DOC L.1, L.2, L.4, and L.13 (EEIB)~~**Deleted**

~~G.2.6.a L.1~~

~~(Category 10 – 18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type) CTS 4.3.2.1.2 requires the total interlock function to be demonstrated OPERABLE at least once per 18 months. ITS SR 3.3.2.12 requires the performance of a CHANNEL OPERATIONAL TEST (COT), which tests a portion of the total interlock function, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).~~

~~The purpose of CTS 4.3.2.1.2 is to ensure the proper operation of the ESFAS interlock functions. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for this COT is acceptable because during the operating cycle, there is sufficient indication of the status of Tavg and pressurizer pressure and the ESFAS interlock status to ensure the interlocks are in the correct status. Based on the inherent system and component reliability and the testing performed during the operating cycle, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.~~

~~[NRC evaluation to be provided later.]~~

~~G.2.6.b~~ L.2

~~CTS 4.3.2.1.2 requires the total interlock function to be demonstrated OPERABLE at least once per 18 months. CTS Table 4.3-2 requires a CHANNEL CALIBRATION of Functional Units 1.c through 1.f, 2.c, 3.b.3), 4.c through 4.e, 5.a, 6.a, 7.a, and 10.c every 18 months. ITS Table 3.3.2-1 Functions 1.c, 1.d, 1.e.(1), 1.e.(2), 2.c, 3.b.(3), 4.c through 4.e, 5.b, 6.c, 7.c, 8.b, and 8.c require the performance of a CHANNEL CALIBRATION every 24 months (ITS SR 3.3.2.10). This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).~~

~~The purpose of the CHANNEL CALIBRATION required by CTS 4.3.2.1.2 and Table 4.3-2 is to ensure the ESFAS instrumentation and interlocks be calibrated correctly to ensure the safety analysis can be met. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. This change is acceptable because the ESFAS, including the actuation logic, is designed to be single failure proof, therefore ensuring system availability in the event of a failure of one of the channel componets. Furthermore, the impacted ESFAS instrumentation has been evaluated for drift using both quantitative and qualitative analysis, based on manufacturer and model number to determine that the instrumentation's actual drift falls within the design allowance in the associated setpoint calculation.~~

~~Functional Units 1.c, 10.c, Containment Pressure - High~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Unit 1.d, Pressurizer Pressure - Low~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro~~

~~Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Unit 1.e, Differential Pressure Between Steam Lines - High~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by Foxboro N-2AI-H2V Input Cards and Foxboro N-2CCA-DC Control Cards performing the trip functions. The signal conditioners and control cards are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Units 1.f, 4.e, Steam Line Pressure - Low~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioners and control cards are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Transmitters' drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Units 2.c, 3.b.3), 4.c, Containment Pressure - High High~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Unit 4.d, Steam Flow in Two Steam Lines - High coincident with Tavg - Low Low~~

~~This function is performed by a loop consisting of 200. Platinum RTDs and Foxboro N-E13 Series Differential Pressure Transmitters with the signals conditioned by Foxboro N-2AI-H2V and N-2AI-P2V Input Cards with a Foxboro N-2CCA-DC Control Card performing the trip functions. The trip setpoint is generated using a Foxboro N-2CCA-DC Control Card based on Turbine Impulse Pressure. The Turbine Impulse Pressure portion of the function is performed by a Foxboro E11 Series Transmitter with the signal conditioned by a Foxboro N- 2AI-H2V Input Card. The Foxboro N-2CCA-DC Control Card generates the setpoint signal. The input and Control Cards are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified by a COT every 184 days, and if necessary, recalibrated (with the exception of the generated setpoint signal which is calibrated every 24 months). These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The RTDs are not calibrated, and as such, instrument drift does not apply to these devices. Response of the RTDs to temperature variations during normal plant operation and during the more frequent testing verifies proper operation of the input signal. The Foxboro Transmitters' drift, (for Differential Pressure and Pressure Transmitters) was determined by quantitative analysis as was the drift for the rack equipment used to generate the setpoint. The drift values determined have been used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of these analyses will support a 24 month Surveillance interval.~~

~~Functional Unit 5.a, Steam Generator Water Level - High High~~

~~This function is performed by a Foxboro (N-)E13 Series Differential Pressure Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Differential Pressure Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~Functional Units 6.a, 7.a, Steam Generator Water Level - Low Low~~

~~This function is performed by a Foxboro (N-)E13 Series Differential Pressure Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore,~~

~~an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Differential Pressure Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~P-11 Interlock~~

~~This function is performed by a Foxboro (N-)E11 Series Transmitter with the signal conditioned by a Foxboro N-2AI-H2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioner and control card are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The Foxboro Transmitter's drift was determined by quantitative analysis. The drift value determined will be used in the development of, confirmation of, or revision to the current plant setpoint and the TS Allowable Value. The results of this analysis will support a 24 month surveillance interval.~~

~~P-12 Interlock~~

~~This function is performed by a loop consisting of a 200. Platinum RTD as the sensing element with the signal conditioned by a Foxboro N-2AI-P2V Input Card and a Foxboro N-2CCA-DC Control Card performing the trip functions. The signal conditioners and control cards are a part of the Foxboro Spec 200 Micro digital rack. The racks are functionally checked and setpoint verified more frequently, and if necessary, recalibrated. These more frequent testing requirements remain unchanged. Therefore, an increase in the calibration surveillance interval does not affect the Foxboro rack components with respect to drift. The RTD sensing element is not subject to drift nor is it calibratable; therefore a quantitative analysis for the sensing element was not required. The results of this analysis will support a 24 month surveillance interval. Based on the design of the instrumentation and the drift evaluations, it is concluded that the impact, if any, from this change on system availability is minimal. A review of the Surveillance test history was performed to validate the above conclusion. This review demonstrates that there are no failures that would invalidate the conclusion that the impact, if any, on system availability from this change is minimal. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.~~

~~[NRC evaluation to be provided later.]~~

~~G.2.6.c~~ ~~L.4~~

~~CTS 4.3.2.1.3 requires the ESF RESPONSE TIME of each ESFAS function to be demonstrated to be within limit at least once per 18 months. ITS SR 3.3.2.13 requires the same test at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).~~

~~The purpose of CTS 4.3.2.1.3 is to ensure the actuation response times are less than or equal to the maximum values assumed in the accident analysis. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for the ESF RESPONSE TIME test is acceptable because the ESFAS instrumentation is verified to be operating properly throughout the operating cycle by the performance of CHANNEL OPERATIONAL TESTS and, in some cases, CHANNEL CHECKS. This testing ensures that a significant portion of the ESFAS circuitry is operating properly and will detect significant failures of this circuitry. Additional justification for extending the Surveillance test interval is that the ESFAS, including the actuating logic, is designed to be single failure proof, therefore ensuring system availability in the event of a failure of one of the channel components. Based on the inherent system and component reliability and the testing performed during the operating cycle, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.~~

~~[NRC evaluation to be provided later.]~~

~~G.2.6.d~~ ~~L.13~~

~~CTS Table 4.3-2 Functional Unit 6.d (Loss of Main Feed Pumps) requires the performance of a CHANNEL FUNCTIONAL TEST every 18 months. CTS Table 4.3-2 Functional Units 9.a, 9.b, 9.c, 9.d, and 9.e (Manual Initiation) require the performance of a TADOT every 18 months. ITS Table 3.3.2-1 Functions 1.a, 2.a, 3.a.(1), 3.b.(1), 4.a, 6.g, and 7.a require the performance of SR 3.3.2.9, a TADOT, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL~~

~~**FUNCTIONAL TEST to a TADOT for CTS Table 4.3-2 Function 6.d is discussed in DOC A.10.**~~

~~**The purpose of the CHANNEL FUNCTIONAL TEST and the TADOT required by CTS Table 4.3-2 is to ensure the ESFAS instrumentation can perform its intended function. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in TS Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Based on the inherent system and component reliability, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.**~~

~~**[NRC evaluation to be provided later.]**~~

G.2.7 <u>ITS 3.3.2, DOC L.5</u>

~~**(Category 4 – Relaxation of Required Action)**~~ CTS Table 3.3-3 Action 13, which applies when a Functional Unit ~~**1.b (Safety Injection Automatic Actuation Logic), 2.b (Containment Spray Automatic Actuation Logic), 3.a.2) (Containment Isolation Phase "A" Isolation From SI Automatic Actuation Logic), 3.b.2) (Containment Isolation Phase "B" Isolation Automatic Actuation Logic), 4.b (Steam Line Isolation Automatic Actuation Logic), or**~~ 10.b (Containment Air Recirculation Fan Automatic Actuation Logic) train is inoperable, allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 14, which applies when a Functional Unit ~~**1.c (Safety Injection Containment Pressure - High), 1.d (Safety Injection Pressurizer Pressure - Low), 1.e (Safety Injection Differential Pressure Between Steam Lines - High), 1.f (Safety Injection Steam Line Pressure - Low), 4.d (Steam Line Isolation Steam Flow in Two Steam Lines - High Coincident with Tavg - Low Low), 4.e (Steam Line Isolation Steam Line Pressure - Low), 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High), 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low), 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low), or**~~ 10.c (Containment Air Recirculation Fan Containment Pressure - High) channel is inoperable, requires the inoperable channel to be placed in trip within 1 hour. No allowance is provided in this Action to allow an inoperable channel to be bypassed for surveillance testing. ~~**CTS Table 3.3-3 Action 16, which applies when a Functional Unit 2.c (Containment Spray Containment Pressure - High High), 3.b.3) (Containment Isolation Phase "B" Isolation Containment Pressure - High High), or 4.c (Steam Line Isolation Containment Pressure - High High) channel is inoperable, allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 19, which applies when a Functional Unit 7.b (Turbine Driven Auxiliary Feedwater Pumps Reactor**~~

~~Coolant Pump Bus Undervoltage) channel is inoperable, requires the inoperable channel to be tripped within 1 hour and allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.~~ ITS 3.3.2 ACTION C, which applies to one train inoperable for ITS Table 3.3.2-1 Function~~al Units 1.b, 2.b, 3.a.(3), 3.b.(2), 4.b, and~~ 7.b, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE. ITS 3.3.2 ACTION D, which applies to one channel inoperable for ITS Table 3.3.2-1 Function~~s 1.c, 1.d, 1.e.(1), 1.e.(2), 4.d, 4.e, 5.b, 6.c, 6.f, and~~ 7.c, requires the inoperable channel be placed in the tripped condition within 6 hours and includes an allowance to bypass one channel for up to 4 hours for surveillance testing of other channels. ~~ITS 3.3.2 ACTION E, which applies to one channel inoperable for ITS Table 3.3.2-1 Functions 2.c, 3.b.(3), and 4.c, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE.~~ This changes the CTS by: a) extending the time allowed to bypass an inoperable **channel (specified as an inoperable** train **in the ITS)** from 2 hours to 4 hours for CTS Table 3.3-3 Functional Unit~~s 1.b, 2.b, 3.a.2), 3.b.2), 4.b, and~~ 10.b; **and** b) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Unit~~s 1.c, 1.d, 1.e, 1.f, 4.d, 4.e, 5.a, 6.a, 7.a, and~~ 10.c channel in the tripped condition from 1 hour to 6 hours and adding an allowance to bypass an inoperable channel~~s of the above CTS Functional Units~~ for 4 hours~~; c) extending the time allowed to bypass an inoperable channel from 2 hours to 4 hours for CTS Table 3.3-3 Functional Units 2.c, 3.b.3), and 4.c; and d) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Unit 7.b channel in the tripped condition from 1 hour to 6 hours and extending the time allowed to bypass an inoperable CTS Table 3.3-3 Functional Unit 7.b channel from 2 hours to 4 hours~~.

The purpose of the current Actions is to provide a short period of time to restore the inoperable channel or train to OPERABLE status. The proposed bypass time of 4 hours in ITS 3.3.2 ACTIONS C~~, D,~~ and ~~E~~**D** is a sufficient time to perform train or channel surveillance. The 4 hour time period is acceptable since it is considered an acceptable amount of time based on the risk analysis of WCAP-10271-P "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System." The 6 hour Completion Time specified in ITS 3.3.2 ACTIONS C~~, D,~~ and ~~E~~**D** is also acceptable since the change results in a small and therefore acceptable impact on plant risk as stated in the NRC Safety Evaluation Reports (SERs) associated with WCAP-10271-P. The licensee has performed an evaluation to ensure that the conditions of the three NRC SERs supporting WCAP-10271-P, including Supplements 1 and 2 and Supplement 2, Revision 1, have been met for the proposed ITS Completion Time and/or bypass time. Specifically, the NRC imposed five conditions on utilities seeking to implement the TS changes approved generically as a result of their review of WCAP-10271 and WCAP-10271 Supplement 1, and two conditions as a result of their review of WCAP-10271 Supplement 2 and Supplement 2, Revision 1. Two of the conditions imposed in the Reactor Trip System (RTS) SER are now not applicable due to approvals given in the ESFAS SER. Conditions given in the RTS SER are considered to apply equally to the ESFAS Functions and equipment, and the conditions given in the ESFAS SER are considered to apply equally to the RTS Functions and equipment. The licensee provided results of this evaluation to the NRC by application dated August 30, 2002 as supplemented by letters dated February 27, April 7, April 29, and May 2, 2003, that requested approval for increasing the CHANNEL OPERATIONAL TEST Surveillance intervals for analog channels, logic cabinets, and reactor trip breakers, and increasing the Completion Time and bypass time for the reactor trip breakers, as allowed by WCAP-15376-P, Revision 0, "Risk-Informed Assessment of the RTS and ESFAS Surveillance

Test Intervals and Reactor Trip Breaker Test and Completion Times," and the Nuclear Regulatory Commission (NRC) staff's approved TS Task Force (TSTF) Traveler TSTF-411, Revision 1, "Surveillance Test Interval Extension for Components of the Reactor Protection System." The NRC granted approval for these new requirements based upon WCAP-15376 by issuing License Amendments 277 (Unit 1) and 260 (Unit 2) on May 23, 2003. In the NRC SER for these amendments, the NRC stated that the December 20, 2002 acceptance letter for WCAP-15376 noted that this topical report was built on the foundation established by WCAP 10271-P and WCAP-14333, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times." As a result, the NRC staff's review of the licensee's application, as supplemented, verified that the applicable implementation requirements associated with the NRC staff acceptance of WCAP-10271 was also adequately addressed by the licensee. Therefore, this change is considered acceptable. The WCAP-10271-P analysis did not review the Containment Air Recirculation Fan Automatic Actuation Logic and Containment Pressure - High Functions. However, since the design of these Functions are similar to the Safety Injection Actuation Logic and Containment Pressure - High Functions, the risk associated with increasing the Completion Times and bypass time are considered acceptable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.2.8 ITS 3.3.2, DOC L.5 and L.17

~~(Category 4 – Relaxation of Required Action)~~ **CTS Table 3.3-3 Action 13, which applies when a Functional Unit 1.b (Safety Injection Automatic Actuation Logic), 2.b (Containment Spray Automatic Actuation Logic), 3.b.2) (Containment Isolation Phase "B" Isolation Automatic Actuation Logic), or 4.b (Steam Line Isolation Automatic Actuation Logic) channel is inoperable, allows one channel to be bypassed for up to two hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 14, which applies when a Functional Unit 1.c (Safety Injection Containment Pressure - High), 1.d (Safety Injection Pressurizer Pressure - Low), 1.e (Safety Injection Differential Pressure Between Steam Lines - High), 1.f (Safety Injection Steam Line Pressure - Low), 4.d (Steam Line Isolation Steam Flow in Two Steam Lines - High Coincident with Tavg - Low Low), 4.e (Steam Line Isolation Steam Line Pressure - Low), 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High), 6.a (Motor Driven AFW Pumps Steam Generator Water Level - Low Low), or 7.a (Turbine Driven AFW Pumps Steam Generator Water Level - Low Low) channel is inoperable, requires the inoperable channel to be placed in trip within one hour. No allowance is provided in this Action to allow an inoperable channel to be bypassed for surveillance testing. CTS Table 3.3-3 Action 16, which applies when a Functional Unit 2.c (Containment Spray Containment Pressure - High High), 3.b.3) (Containment Isolation Phase "B" Isolation Containment Pressure - High High), or 4.c (Steam Line Isolation Containment Pressure - High High) channel is inoperable, allows one channel to be bypassed for up to two hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 19, which applies when a Functional Unit 7.b (Turbine Driven Auxiliary Feedwater Pumps Reactor Coolant Pump Bus Undervoltage) channel is inoperable, requires the inoperable channel to be tripped within one hour and allows one channel to be bypassed for up to two hours for surveillance testing per Specification 4.3.2.1.1.** CTS Table 3.3-3 Functional Units 6 (Motor

Driven Auxiliary Feedwater Pumps) and 7 (Turbine Driven Auxiliary Feedwater Pumps) do not include the Automatic Actuation Logic and Actuation Relays Function. New requirements were added as ITS Table 3.3.2-1 Function 6.a, the Automatic Actuation Logic and Actuation Relays (Solid State Protection System) and Function 6.b, the Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS). ~~**The Applicability of these Functions is MODES 1, 2, and 3 and two trains of each Function are required to be OPERABLE, as discussed in DOC A.13.**~~ **ITS 3.3.2 ACTION C, which applies to one train inoperable for ITS Table 3.3.2-1 Functional Units 1.b, 2.b, 3.b.(2), and 4.b, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE. ITS 3.3.2 ACTION D, which applies to one channel inoperable for ITS Table 3.3.2-1 Functions 1.c, 1.d, 1.e.(1), 1.e.(2), 4.d, 4.e, 5.b, 6.c, and 6.f, requires the inoperable channel be placed in the tripped condition within 6 hours and includes an allowance to bypass one channel for up to 4 hours for surveillance testing of other channels. ITS 3.3.2 ACTION E, which applies to one channel inoperable for ITS Table 3.3.2-1 Functions 2.c, 3.b.(3), and 4.c, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE.** ITS 3.3.2 ACTIONS C and ~~H~~**I** have been included for ~~these~~**ITS Table 3.3.2-1** Functions **6.a and 6.b** and provide 6 hours to restore an inoperable train to OPERABLE status if one train is inoperable (ACTION C), and if not restored, provide a shutdown requirement (ACTION ~~H~~**I**). In addition, ITS 3.3.2 ACTION C includes an allowance to bypass one train for up to 4 hours for Surveillance testing provided the other train is OPERABLE. ITS 3.3.2 ACTION ~~H~~**I** requires the unit to be placed in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by**: a) extending the time allowed to bypass an inoperable train from 2 hours to 4 hours for CTS Table 3.3-3 Functional Units 1.b, 2.b, 3.b.2), and 4.b; b) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Units 1.c, 1.d, 1.e, 1.f, 4.d, 4.e, 5.a, 6.a, and 7.a channel in the tripped condition from 1 hour to 6 hours and adding an allowance to bypass an inoperable channels of the above CTS Functional Units for 4 hours; c) extending the time allowed to bypass an inoperable channel from 2 hours to 4 hours for CTS Table 3.3-3 Functional Units 2.c, 3.b.3), and 4.c; d) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Unit 7.b channel in the tripped condition from 1 hour to 6 hours and extending the time allowed to bypass an inoperable CTS Table 3.3-3 Functional Unit 7.b channel from 2 hours to 4 hours; and e) by** providing specific ACTIONS to enter when an Automatic Actuation Logic and Actuation Relays Function associated with AFW instrumentation is inoperable.

The purpose of the current Actions is to provide a short period of time to restore the inoperable channel or train to OPERABLE status. The proposed bypass time of 4 hours in ITS 3.3.2 ACTIONS C, D, and E is a sufficient time to perform train or channel surveillance. The ~~**purpose of the ITS 3.3.2 ACTION C is to provide a short period of time to restore an inoperable Automatic Actuation Logic and Actuation Relays train and the**~~ purpose of ITS 3.3.2 ACTION ~~H~~**I** is to place the unit outside the Applicability of the Auxiliary Feedwater instrumentation. ~~**The purpose of the proposed bypass time of 4 hours in ITS 3.3.2 ACTION C is to provide sufficient time to perform a train Surveillance.**~~ Currently, if an Automatic Actuation Logic and Actuation Relays Function is inoperable, the affected Auxiliary Feedwater instrumentation channels would be required to be declared inoperable, resulting in entry into CTS 3.0.3 since no Action is provided for this case. CTS 3.0.3 allows 1 hour to initiate action, 7 hours for the unit to be placed in MODE 3, and 13 hours for the unit to be placed in MODE 4. If a train is inoperable, ITS 3.3.2 provides 6 hours to restore the train to OPERABLE status

(ACTION C), and if not restored, provides a shutdown requirement (ACTION ~~H~~I). ITS 3.3.2 ACTION ~~H~~I requires the unit to be placed in MODE 3 in 6 hours and MODE 4 in 12 hours. The proposed Completion Time of 6 hours in ITS 3.3.2 ACTION C is acceptable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. The Completion Time of 6 hours to reach MODE 3 and 12 hours to reach MODE 4, in a safe manner without challenging unit systems, is consistent with other CTS and ITS requirements. The 4 hour bypass time period in **ITS 3.3.2 ACTIONS C, D, and E** is acceptable since it is considered an acceptable amount of time based on the risk analysis of WCAP-10271-P, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System." The licensee has performed an evaluation to ensure that the conditions of the three NRC SERs supporting WCAP-10271-P, including Supplements 1 and 2 and Supplement 2, Revision 1, have been met for the proposed ITS Completion Time and/or bypass time. Specifically, the NRC imposed five conditions on utilities seeking to implement the TS changes approved generically as a result of their review of WCAP-10271 and WCAP-10271 Supplement 1, and two conditions as a result of their review of WCAP-10271 Supplement 2 and Supplement 2, Revision 1. Two of the conditions imposed in the Reactor Trip System (RTS) SER are now not applicable due to approvals given in the ESFAS SER. Conditions given in the RTS SER are considered to apply equally to the ESFAS Functions and equipment, and the conditions given in the ESFAS SER are considered to apply equally to the RTS Functions and equipment. The licensee provided results of this evaluation to the NRC by application dated August 30, 2002, as supplemented by letters dated February 27, April 7, April 29, and May 2, 2003, that requested approval for increasing the CHANNEL OPERATIONAL TEST surveillance intervals for analog channels, logic cabinets, and reactor trip breakers, and increasing the Completion Time and bypass time for the reactor trip breakers, as allowed by WCAP-15376-P, Revision 0, "Risk- Informed Assessment of the RTS and ESFAS Surveillance Test Intervals and Reactor Trip Breaker Test and Completion Times," and the Nuclear Regulatory Commission (NRC) staff's approved TS Task Force (TSTF) Traveler TSTF-411, Revision 1, "Surveillance Test Interval Extension for Components of the Reactor Protection System." The NRC granted approval for these new requirements based upon WCAP-15376 by issuing License Amendments 277 (Unit 1) and 260 (Unit 2) on May 23, 2003. In the NRC SER for these amendments, the NRC stated that the December 20, 2002 acceptance letter for WCAP-15376 noted that this topical report was built on the foundation established by WCAP 10271-P and WCAP-14333, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times." As a result, the NRC staff's review of the licensee's application, as supplemented, verified that the applicable implementation requirements associated with the NRC staff acceptance of WCAP-10271 was also adequately addressed by the licensee. Therefore this change is considered acceptable. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.

[NRC evaluation to be provided later.]

G.2.9 <u>ITS 3.3.2, JFD 23 (Containment or Reactor Systems Issue)</u>

~~**Evaluate the justification for deviation from STS for the P-12 interlocl action to place in "trip" (proposed ITS) vice "place in the required state."**~~

~~**STS Table 3.3.1-1 (ITS Table 3.3.1-1) Function 18 (Reactor Trip System Interlocks) has been revised to reflect the DCC specific design and nomenclature.**~~

When an ISTS Table 3.3.2-1 Function 8.c (ITS Table 3.3.2-1 Function 8.c) P-12 interlock channel is inoperable, ISTS 3.3.2 ACTION L must be taken, and requires verification that the interlock is in the required state for the existing unit condition. However, the P-12 interlock also prevents a steam line isolation from occurring on a high steam line flow when T_{avg} is above the T_{avg} - Low Low reset point. Thus, placing the P-12 interlock channel in the required state for the existing unit condition is not always a conservative action, since if a steam line break were to occur, the reactor coolant temperature would decrease to below the T_{avg} - Low Low reset point. Since compliance with ISTS 3.3.2 ACTION L would result in placing the P-12 interlock in a condition that prevents the steam line isolation, the ACTION is not conservative. Therefore, ITS Table 3.3.2-1 requires ISTS 3.3.2 ACTION D (ITS 3.3.2 ACTION D) to be entered when one channel of the P-12 interlock Function is inoperable, and this ACTION requires placing the channel in trip, which is conservative for the steam line break event (i.e., the steam line isolation will not be blocked).

[NRC evaluation to be provided later.]

G.2.10 <u>ITS 3.3.3, DOC L.4</u>

~~**(Category 4 – Relaxation of Required Action)**~~ Unit 1 CTS 3.3.3.8 Action b.2 and Unit 2 CTS 3.3.3.6 Action b.2, in the event of an inoperable Refueling Water Storage Tank Water Level PAM instrumentation channel, require action to be taken within one hour to bypass the Residual Heat Removal (RHR) pump trip function from the Refueling Water Storage Tank Water Level instrumentation for the pump associated with the out-of-service instrument. ITS 3.3.3 does not include this requirement. This changes the CTS by eliminating the Action requirement to bypass the RHR trip function when the Refueling Water Storage Tank Water Level PAM instrumentation channel is inoperable.

The purpose of the action to bypass the RHR pump trip function is to maintain RHR pump availability in the event of Refueling Water Storage Tank Water Level instrumentation inoperability. The Refueling Water Storage Tank Water Level PAM instrumentation provides level indication in the control room for the operators to determine when to manually transfer suction of the ECCS pumps from the depleted refueling water storage tank to cold leg recirculation from the containment recirculation sump following an accident. This level instrumentation also provides a bistable input to trip the Residual Heat Removal (RHR) pump when Refueling Water Storage Tank level falls below a preset level to protect the RHR pump. However, this bistable function is not part of the PAM Instrumentation Function, and the bistable Function is not necessary for the OPERABILITY of the PAM Instrumentation Function. The definition of OPERABLE-OPERABILITY and the requirements in ITS 3.5.2 are adequate to ensure that, if this bistable results in RHR pump inoperability, then the applicable actions of ITS 3.5.2 will be taken. In addition, the requirements of the ITS 3.5.2 ACTIONS and the requirements of 10 CFR 50.65 ensure that RHR pump availability is adequately maintained. Therefore, the CTS action to bypass the bistable trip of the associated RHR pump when a Refueling Water Storage Tank Water Level PAM instrument is inoperable is unnecessary. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.

NRC Staff Evaluation:

In the event of an inoperable Refueling Water Storage Tank (RWST) Post Accident Monitoring (PAM) water level instrumentation channel, CNP Unit 1 CTS 3.3.3.8 Action b.2 and Unit 2 CTS 3.3.3.6 Action b.2, respectively, require action to be taken within one hour to bypass the Residual Heat Removal (RHR) pump trip function from the RWST water level instrumentation. The purpose of the action to bypass the RHR pump trip function is to maintain RHR pump availability in the event of RWST Water Level instrumentation inoperability. The licensee proposes in ITS 3.3.3 to eliminate the requirements for the RHR trip bypass when the RWST PAM level instrumentation becomes inoperable.

The RWST Level PAM instrumentation provides level indication in the control room for the operators to determine when to manually transfer suction of the Emergency Core Cooling System (ECCS) pumps from the depleted RWST to the containment recirculation sump following an accident. This level instrumentation also provides a bistable input to trip the RHR pump when RWST level falls below a preset level to protect the RHR pump.

The NRC staff requested additional information regarding the effect of removing the bypass requirement and its safety significance as it relates to the OPERABILITY of the RHR pumps in the event of an accident where the RHR pumps are needed. The licensee responded that the RHR pump trip function on low RWST level is a feature designed for equipment protection only. The trip function is not assumed in the safety analyses, and is not part of any design feature to provide for automatic operations related to switchover of ECCS pumps, including the RHR pumps, from taking suction from the RWST to the containment recirculation sump following a design basis accident. Therefore, this trip function is not required to be OPERABLE for the RHR pump to be able to perform its safety function, and is not required for RHR pump OPERABILITY. However, if this instrumentation were to fail in such a way as to prevent the RHR pump from starting on a valid automatic or manual actuation signal, then RHR pump would be inoperable. If this would occur, as with any equipment found in a degraded condition, the applicability of the ITS 3.5.2 would be taken. ITS 3.5.2 requires that two ECCS subsystems shall be OPERABLE, and, in the case of an inoperable RHR pump due to the bistable input, the required action would be taken to restore the inoperable RHR pump to OPERABLE status within 72 hours or be within HOT SHUTDOWN within the next 12 hours. If the RWST level instrument were inoperable in such a way that the RHR pump could not perform the required safety function (e.g., if the RWST level instrument failed low), then the RHR pump would have to be declared inoperable until the instrument was repaired at its specified time **or the low level trip was bypassed**. The ITS 3.5.2 requirements eliminate the need for the bypass requirement from having to ensure the OPERABILITY of the RHR pumps.

The regulation 10 CFR 50.65 requires the operators to assess the performance of the RHR pumps and the effectiveness of their maintenance. Specifically, if the RWST PAM instrument failed such that the RHR could not perform its intended function, then the impact on availability and reliability of the RHR pump would have to be assessed.

The NRC staff agrees that the bistable function is not part of the PAM Instrumentation Function, and is not necessary for the OPERABILITY of the PAM Instrumentation Function. The requirements of ITS 3.5.2 and 10 CFR 50.65 will ensure that RHR pump availability is adequately maintained if the bistable results in RHR pump inoperability. Therefore, the NRC staff concludes that the eliminating the bypass requirement would not affect the safety function

of the RHR pumps during an accident when the RWST PAM level instrument is inoperable, and, based on this, the NRC staff further concludes that the proposed change is acceptable

G.2.11 ITS 3.3.3, DOC L.13

~~**(Category 7 – Relaxation Of Surveillance Frequency, Non-24 Month Type Change)**~~ CTS 4.6.4.1 requires each hydrogen analyzer to be demonstrated OPERABLE at least once per 92 days "on a STAGGERED TEST BASIS" by performing a CHANNEL CALIBRATION. ITS SR 3.3.3.2 requires a CHANNEL CALIBRATION of the hydrogen monitors to be performed at a Frequency of every 92 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.

The purpose of the CHANNEL CALIBRATION surveillance is to demonstrate the OPERABILITY of the hydrogen monitors. This change is acceptable because the new Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. This change deletes the requirement to perform the CHANNEL CALIBRATION on a STAGGERED TEST BASIS. The intent of a requirement for staggered testing is to increase reliability of the component/system being tested. A number of studies have been performed that have demonstrated that staggered testing has negligible impact on component reliability. These analytical and subjective analyses have determined that staggered testing 1) is operationally difficult, 2) has negligible impact on component reliability, 3) is not as significant as initially thought, 4) has no impact on failure frequency, 5) introduces additional stress on components potentially causing increased component failures rates and component wearout, 6) results in reduced redundancy testing, and 7) increases likelihood of human error by increasing testing intervals. Therefore, the hydrogen monitors CHANNEL CALIBRATION staggered testing requirements have been deleted. This change is designated as less restrictive because the intervals between performances of the Surveillances for the two hydrogen monitors can be larger or smaller under the ITS than under the CTS.

[NRC evaluation to be provided later.]

G.2.12 ~~**ITS 3.3.5, DOC L.2**~~**Deleted**

~~**(Category 3 - Relaxation of Completion Time) CTS Table 3.3-3 Action 14 requires, with the number of OPERABLE channels one less than the total number of channels, that the inoperable channel be placed in trip within 1 hour. This CTS Action applies to the Loss of Voltage and Degraded Voltage Functions of CTS Table 3.3-3. ITS 3.3.5 ACTION A allows 6 hours to place the channel in trip when one Loss of Voltage or Degraded Voltage channel is inoperable. This changes the CTS by extending the time for placing a channel in trip, when a Loss of Voltage Function of Degraded Voltage channel is inoperable, from 1 hour to 6 hours.**~~

~~**The Required Actions are used to establish remedial measures that must be taken in response to the degraded conditions in order to minimize risk associated with continued operation while providing time to repair inoperable features. This change is acceptable because the Required Actions are consistent with safe operation under the specified Condition, considering the OPERABLE status of the redundant instrumentation channels. This includes the capacity and capability of remaining channels, a reasonable**~~

~~**time for repairs or replacement, and the low probability of a design basis accident (DBA) occurring during the repair period. The ITS Action will allow 6 hours to trip the channel when one channel is inoperable. This is a reasonable period of time because of the low probability of an event occurring that would require a LOP DG start, and because of the LOP start actuation capability provided by the remaining OPERABLE channels of the associated Function. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.**~~

~~**[NRC evaluation to be provided later.]**~~

G.2.13 ITS 3.3.5, Bases Insert 4

Reference 4~~**, a Setpoint Methodology citation, is added to the Bases. Reference 4**~~ of the ITS 3.3.5 Bases was proposed as an internal engineering document defining the NRC-approved CNP Setpoint Methodology for determining Allowable Values for the Loss of Voltage and Degraded Voltage relays. This reference has been revised to appropriately reference the NRC-approved topical report (WCAP-12741, "Westinghouse Menu Driven Setpoint Calculation Program (STEPIT)," as approved in Unit 1 and Unit 2 License Amendments 175 and 160, dated May 13, 1994) that defines the CNP Setpoint Methodology for this instrumentation. In addition, ITS 3.3.1 and ITS 3.3.2 Bases have been revised to reference the same topical report.

[NRC evaluation to be provided later.]

G.2.14 ITS 3.5.5, ~~**Required Action A.1**~~**JFD 4**

~~**DCC is proposing to revise the wording in Required Action A.1 of ITS 3.5.5. The proposed change is not consistent with the CTS, STS or TSTF-337. In the conversion of the CTS to the plant specific ITS, certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431. These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.**~~**CTS LCO 3.4.6.2.e requires seal line resistance to be ≥ 2.27 E-1 ft/gpm^2. CTS 3.4.6.2 Actions do not specify the exact method required to restore seal line resistance to within this limit.**
CTS 4.4.6.2.1.c requires seal line resistance to be measured and verified to be ≥ 2.27 E-1 ft/gpm^2. ISTS 3.5.5 Required Action A.1 requires the manual seal injection throttle valves to be adjusted to give a flow resistance within limit. ISTS SR 3.5.5.1 requires verification that the manual seal injection throttle valves are adjusted to give a flow within limit. The ITS 3.5.5 Required Action A.1 requires restoration of seal injection flow resistance to within limit and ITS SR 3.5.5.1 requires verification that seal injection flow resistance is within limits. This changes the ISTS to be consistent with the level of detail in the CTS, and eliminates the single, specific method allowed by the ISTS to restore compliance with the LCO or to meet the SR acceptance criteria.

[NRC evaluation to be provided later.]

5.0 RELOCATED ~~DC~~CNP UNITS 1 AND 2 LICENSE CONDITIONS

In Enclosure 8 to its application, the licensee has identified three license conditions in the ~~DC~~CNP Units 1 and 2 operating licenses that it proposes to relocate to the ITS or other licensee-controlled documents as described below:

1. Unit 1 License Condition 2.C.(7) and Unit 2 License Condition 2.C.(3)~~.~~(v), "Secondary Water Chemistry Monitoring Program," that describes what the program to inhibit steam generator tube degradation shall include. The licensee has proposed to relocate the requirements to ITS 5.5.8, "Secondary Water Chemistry ~~Monitoring~~ Program."

2. Unit 1 License Condition 2.H and Unit ~~1~~2 License condition 2.G, "System Integrity," that describes what a program a program to reduce leakage from systems outside containment shall include. The licensee has proposed to relocate the requirements to ITS 5.5.2, "Leakage Monitoring Program."

3. Unit 1 License Condition 2.I and Unit ~~1~~2 License condition 2.H, "Iodine Monitoring," that describes what a program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions shall include. The licensee has proposed to include the requirements in the TRM.

For the first set of license conditions, the requirements in the license conditions are in the proposed ITS 5.5.8.

For the second set of license conditions, the requirements in the license conditions are in the proposed ITS 5.5.2 except, whereas the license conditions state that integrated test requirements for each system at a frequency not to exceed the refueling cycle interval, the licensee has proposed 24 months.

For the third set of license conditions, the licensee stated that the requirements are not included in the ISTS.

6.0 COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversion for ~~DC~~CNP, the NRC staff has relied upon the licensee's commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table L~~R~~A, "~~Less Restrictive-Relocated~~Removed Details" (Attachment 5 to this SE) and Table R, "Relocated Specifications" (Attachment 6 to this SE). These tables reflect the relocations described in the licensee's submittals on the conversion. The NRC staff requested and the licensee submitted a set of license conditions to make these commitments enforceable (see Section ~~6~~7.0 of this SE). Such commitments from the licensee are important to the ITS conversion because the acceptability of removing certain requirements from the TSs is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by applicable regulations or other requirements (e.g., 10 CFR 50.59).

7.0 LICENSE CONDITIONS

In its letter dated ~~November XX, 2004~~**April XX, 2005**, the licensee agreed to license conditions to define the schedule to begin performing the new and revised SRs after implementation of the ITS. The following license conditions are included in the Facility Operating Licenses:

(1) The schedule for performing SRs that are new or revised in License Amendment~~s~~ **No.** XXX **(Unit 1)/YYY (Unit 2)** shall be as follows:

For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment**, except as noted below for SRs that have modified acceptance criteria as a result of revised Allowable Values**.

For SRs that have modified acceptance criteria as a result of revised Allowable Values, the current Allowable Values and current CHANNEL CALIBRATION frequencies are required to be met until the trip setpoints are changed to reflect the new Allowable Values and CHANNEL CALIBRATION frequencies. The trip setpoints are required to be changed no later than the unit startup after the first outage of sufficient duration to change all of the trip setpoints for the unit following implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment**, except as noted above for SRs that have modified acceptance criteria as a result of revised Allowable Values**.

The NRC staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule. The licensee stated that their implementation date for the new ITS is no later than October 31, ~~2002~~**2005**. This implementation date is acceptable.

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are described in **Table LA and** Table R, which ~~is~~**are** Attachment**s 5 and** 6 to this SE. The license condition states that the relocations would be completed no later than ~~March 31, 2005~~**October 31, 2005**, which is about ~~120~~**180** days from the date of these amendments. This schedule is acceptable.

8.0 STATE CONSULTATION

In accordance with the Commission's regulations, the ~~Minnesota~~**Michigan** State official was notified of the proposed issuance of the amendment. The State official had no comments.

9.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on ~~September XX~~**December 21**, 2004 (~~XX~~**69** FR ~~XXXXX~~**76483**), for the proposed conversion of the CTS to ITS for ~~DC~~C**NP**. Accordingly, the Commission has determined that issuance of these amendments will not result in any significant environmental impacts other than those evaluated in the Final Environmental Statement.

10.0 CONCLUSION

The ~~DC~~C**NP** ITS provides clearer, more readily understandable requirements to ensure safer operation of the units. For the reasons stated in this SE, the NRC staff is considering concluding that the ITS satisfy the guidance in the Commission's Final Policy Statement and 10 CFR 50.36 on the content of the TSs with regard to the content of TSs, and conform to the **I**STS in NUREG-1431 for Westinghouse plants with appropriate modifications for plant-specific considerations. Based on these conclusions, the NRC staff further is considering to conclude that the proposed ITS for ~~DC~~C**NP** Units 1 and 2 as documented in the licensee's application and supplemental letters is acceptable.

Attachments:
1. List of Acronyms
2. Table A - Administrative Changes
3. Table M - More Restrictive Changes
4. Table L~~R~~ - Less Restrictive Changes
5. Table LA - Removed Details
6. Table R - Relocated Specifications

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Date: ~~September~~**May** XX, 200~~4~~**5**

LIST OF ACRONYMS

AFW	**Auxilary Feedwater**
ASME	American Society of Mechanical Engineers
BSI	Beyond-Scope Issue
CDF	Core Damage Frequency
CFR	Code of Federal Regulations
COLR	Core Operating Limits Report
COT	**CHANNEL OPERATIONAL TEST**
CRAC	**Control Room Air Conditioning**
CRDS	**Control Rod Drive System**
CREV	**Control Room Emergency Ventilation**
CTS	Current TS
CVCS	**Chemical and Volume Control System**
DBA	Design~~-~~ Basis Accident
DBE	**Design Basis Event**
DG	**Diesel Generator**
DNB	**Departure from Nucleate Boiling**
~~DC~~C**NP**	Donald C. Cook Nuclear Plant
DOC	Discussion of Change (from the CTS)
ECCS	Emergency Core Cooling System
ENC	**Exxon Nuclear Company**
ESF	**Engineered Safety Features**
ESFAS	**ESF Actuation System**
ESW	**Essential Service Water**
FHA**EV**	Fuel Handling ~~Accident~~**Area Exhaust Ventilation**
FR	Federal Register
GDC	General Design Criteria
IIP	**ISI Plan**
ISI	Inservice Inspection
IST	Inservice Testing
ITS	Improved TS
JFD	Justification for Deviation **(from the ISTS and ISTS Bases)**
LCO	Limiting Condition for Operation
LOCA	Loss-of-Coolant Accident
MAAP	**Modular Accident Analysis Program**
MSLB	**Main Steam Line Break**
NRC	**Nuclear Regulatory Commission**
NTSP	**Nominal Trip Setpoint**
ODCM	Offsite Dose Calculation Manual
OM Codes	**ASME Operation and Maintenance Standards and Guides**
PAM	**Post Accident Monitoring**
~~**P/T**~~	~~**Pressure/Temperature**~~
~~**PTLR**~~	~~**Pressure Temperature Limits Report**~~
QA	Quality Assurance
QAPD	**QA Program Description**
RAI	Request for Additional Information
RCCA	**Rod Cluster Control Assembly**

LIST OF ACRONYMS (Continued)

RCP	**Reactor Coolant Pump**
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
~~**RPV**~~	~~**Reactor Pressure Vessel**~~
RTS	Reactor Trip System
RWST	Refueling Water Storage Tank
SAL	**Safety Analysis Limit**
~~**SBVS**~~	~~**Shield Building Ventilation System**~~
SE	Safety Evaluation
SER	Safety Evaluation Report
~~**SFPSVS**~~	~~**Spent Fuel Pool Special Ventilation system**~~
SG	Steam Generator
~~**SGTR**~~	~~**Steam Generator Tube Rupture**~~
SI	Safety Injection
SR	Surveillance Requirement
ISTS	Improved Standard TS, NUREG-1431, Revision 1
~~**CL**~~	~~**Service Water**~~
TADOT	**TRIP ACTUATING DEVICE OPERATIONAL TEST**
TMD	**Transient Mass Distribution**
TRM	Technical Requirements Manual
TS	Technical Specification
TSTF	TSs Task Force (re: generic changes to the **I**STS)
U**F**SAR	Updated **Final** Safety Analysis Report
WEC	**Westinghouse Electric Company**

REPLACEMENT PAGES FOR
DRAFT SAFETY EVALUATION ATTACHMENT 2,
TABLE A - ADMINISTRATIVE CHANGES

ATTACHMENT 2

Table A - Administrative Changes

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes and do not result in technical changes to the CTS.	1.1	1.0, Table 1.1, 4.1.1.1.1.a, 4.1.1.2.a
1.0 A.2	CTS Section 1.0 and Table 1.1, "OPERATIONAL MODES," provide a description of the MODES. ITS Section 1.1 and Table 1.1-1, "MODES," changes the CTS MODE definitions in several ways: The phrase "Reactor vessel head unbolted or removed" in CTS Table 1.1 Note ** is replaced with "One or more reactor vessel head closure bolts less than fully tensioned" in ITS Table 1.1-1 Note c. The CTS Table 1.1 Note ** condition "fuel in the vessel" is moved to the ITS MODE definition. ITS Table 1.1-1 contains a new Note b, which applies to MODES 4 and 5. Note b states "All reactor vessel head closure bolts fully tensioned." This Note is the opposite of CTS Note ** and ITS Table 1.1-1 Note c. For consistency with the Notes in ITS Table 1.1-1, the ITS definition of MODE adds "reactor vessel head closure bolt tensioning" to the list of characteristics that define a MODE. Currently, the CTS definition does not include this clarification. These changes are administrative because they clarify the application of the MODES and no technical changes to the MODE definitions are made. The clarifications are consistent with the current use and application of the MODES.	1.1, Table 1.1-1	1.4, Table 1.1
1.0 A.3	The CTS Section 1.0 definition of OPERABLE-OPERABILITY requires a system, subsystem, train, component or device to be capable of performing its "specified function(s)" and all necessary support systems to also be capable of performing their "function(s)." The ITS Section 1.1 definition of OPERABLE-OPERABILITY requires the system, subsystem, train, component, or device to be capable of performing the "specified safety function(s)," and requires all necessary support systems that are required for the system, subsystem, train, component, or device to perform its "specified safety function(s)" to also be capable of performing their related support functions. This changes the CTS by altering the requirement to be able to perform "functions" to a requirement to be able to perform "safety functions." The purpose of the CTS and ITS definitions of OPERABLE-OPERABILITY is to ensure that the safety analysis assumptions regarding equipment and variables are valid. This change is administrative because the intent of both the CTS and ITS definitions is to address the safety function(s) assumed in the accident analysis and not encompass other non-safety functions a system may also perform. These non-safety functions are not assumed in the safety analysis and are not needed in order to protect the public health and safety. This change is consistent with the current interpretation and use of the terms OPERABLE and OPERABILITY. This change is administrative as it does not change the current use and application of the Technical Specifications.	1.1	1.6

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.4	The CTS Section 1.0 definition of OPERABLE-OPERABILITY requires that all necessary normal and emergency electrical power sources be available for the system, subsystem, train, component, or device to be OPERABLE. The ITS Section 1.1 definition of OPERABLE-OPERABILITY will replace the phrase "normal and emergency electrical power sources" with "normal or emergency electrical power sources." This changes the CTS definition of OPERABLE-OPERABILITY by allowing a device to be considered OPERABLE with either normal or emergency power available. The OPERABILITY requirements for normal and emergency power sources are clearly addressed in CTS 3.0.5. These requirements allow only the normal or the emergency electrical power source to be OPERABLE, provided its redundant system(s), subsystem(s), train(s), component(s), and device(s) (redundant to the systems, subsystems, trains, components, and devices with an inoperable power source) are OPERABLE. This effectively changes the current "and" to an "or." The existing requirements (CTS 3.0.5) are incorporated into ITS 3.8.1 ACTIONS for when a normal (offsite) or emergency (diesel generator) power source is inoperable. Therefore, the ITS definition now uses the word "or" instead of the current word "and." In ITS 3.8.1, new times are provided to perform the determination of OPERABILITY of the redundant systems, et. al. This change is discussed in the Discussion of Changes (DOCs) for ITS 3.8.1. This change administrative since the ITS definition is effectively the same as the CTS definition.	1.1	1.6
1.0 A.5	CTS Section 1.0 includes the following definitions: ALLOWABLE POWER LEVEL, CONTAINMENT INTEGRITY, GASEOUS RADWASTE TREATMENT SYSTEM, MEMBER(S) OF THE PUBLIC, PURGE - PURGING, REPORTABLE EVENT, SITE BOUNDARY, SOURCE CHECK, UNRESTRICTED AREA, VENTILATION EXHAUST TREATMENT SYSTEM, and VENTING. The ITS does not use this terminology and ITS Section 1.1 does not contain these definitions. These changes are administrative because the terms are not used as defined terms in the ITS. Discussions of any technical changes related to the deletion of these terms are included in the DOCs for the CTS sections in which the terms are used. These changes are administrative because they eliminate defined terms that are no longer used.	N/A	1.38, 1.8, 1.31, 1.35, 1.33, 1.7, 1.36, 1.27, 1.37, 1.32, 1.34

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.6	The CTS defines a CHANNEL CALIBRATION as "the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated." ITS defines a CHANNEL CALIBRATION as "the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS. The CTS definition states, "The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions." The ITS states, "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY." The CTS states that the CHANNEL CALIBRATION "shall include the CHANNEL FUNCTIONAL TEST." The ITS does not include this statement. The ITS adds the statement, "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel." The purpose of a CHANNEL CALIBRATION is to adjust the channel output so that the channel responds within the necessary range and accuracy to known values of the parameters that the channel monitors. These changes are administrative changes and do not result in technical changes to the CTS.	1.1	1.9

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.7	CTS Section 1.0 defines CHANNEL FUNCTIONAL TEST as "the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and/or trip functions." ITS Section 1.1 renames the CTS definition to CHANNEL OPERATIONAL TEST (COT), and defines it as "the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps." The addition of use of an actual signal is discussed in DOC L.1. This changes the CTS by stating that the COT shall include adjustments, as necessary, of the devices in the channel so that the setpoints are within the required range and accuracy, changes the example list of devices contained in the definition, and states that the test may be performed by means of any series of sequential, overlapping, or total channel steps. The CTS definition states that the CHANNEL FUNCTIONAL TEST shall verify that the channel is OPERABLE "including alarm and/or trip functions." The ITS states that the COT shall verify OPERABILITY of "all devices in the channel required for channel OPERABILITY." The ITS states "The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy." The ITS states "The COT may be performed by means of any series of sequential, overlapping, or total channel steps." These changes are administrative changes and do not result in technical changes to the CTS.	1.1	1.11
1.0 A.8	CTS Section 1.0 provides a definition of CORE ALTERATION. The ITS Section 1.1 definition of CORE ALTERATION revises the CTS definition to eliminate two redundant phrases. The CTS definition includes "movement or manipulation" of any component within the reactor pressure vessel. The ITS definition of CORE ALTERATION will only include "movement" of components, not "manipulation." The CTS definition does not preclude completion of movement of a component to a "safe conservative" position. The ITS definition specifies only a "safe" position. These changes are administrative because they do not represent a technical change to the Technical Specifications.	1.1	1.12

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.9	CTS Section 1.0 provides a definition of SHUTDOWN MARGIN (SDM). CTS 4.1.1.1.1.a and CTS 4.1.1.2.a provide an exception to the SDM definition, such that if a control rod is inoperable due to being immovable or untrippable, the SDM is modified (increased) by the worth of the inoperable rod. The ITS Section 1.1 definition of SDM contains two differences from the CTS definition. The CTS definition is changed to indicate that the worth of any Rod Control Cluster Assemblies (RCCAs) which are not capable of being fully inserted must be accounted for in the determination of the SDM. Currently, this requirement is not in the CTS. The CTS definition is clarified to include a description of the reactor fuel and moderator temperature conditions (i.e., nominal zero power level) at which the SDM is calculated when in MODE 1 or 2. These changes are administrative because they do not represent a technical change to the Technical Specifications.	1.1	1.13, 4.1.1.1.1.a, 4.1.1.2.a
1.0 A.10	CTS Section 1.0 provides definitions for CONTROLLED LEAKAGE, IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE. ITS Section 1.1 includes these requirements in one definition called LEAKAGE (which includes three categories: identified LEAKAGE, unidentified LEAKAGE, and pressure boundary LEAKAGE). This changes the CTS by incorporating the definitions into the ITS LEAKAGE definition with no technical changes. The CTS term CONTROLLED LEAKAGE, which is the seal water flow supplied to the reactor coolant pump seals, is no longer considered leakage and has its own specification titled "Seal Injection Flow" as ITS 3.5.5. Since seal injection flow is no longer considered leakage, it appears as an exception in the CTS definitions of IDENTIFIED LEAKAGE and UNIDENTIFIED LEAKAGE. As a result, the ITS will not contain a defined term, "CONTROLLED LEAKAGE." These changes are administrative changes and do not result in technical changes to the CTS.	1.1	1.17, 1.14, 1.16, 1.15
1.0 A.11	The CTS Section 1.0 definition of STAGGERED TEST BASIS states, "A STAGGERED TEST BASIS shall consist of: a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals, b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval." The ITS Section 1.1 definition states, "A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during *n* Surveillance Frequency intervals, where *n* is the total number of systems, subsystems, channels, or other designated components in the associated function." This changes the CTS to specify the frequency of a Surveillance on one system, subsystem, train, or other designated component in the Frequency column of the ITS instead of specifying the frequency in which all systems, subsystems, trains, or other designated components must be tested. This change represents an editorial preference in the ITS. This change is administrative as no technical changes are made to the Technical Specifications.	1.1	1.20

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.12	CTS Section 1.0 provides a definition of FREQUENCY NOTATION and includes CTS Table 1.2, which lists these notations. The ITS will not contain this information in Section 1.1, but will state the requirements in each Surveillance. This change is administrative because each ITS Surveillance Requirement (SR) provides the specific frequency without relying on a notation (e.g., "31 days" versus "M"). Providing the specific frequencies in the Surveillance Requirements eliminates the need for the FREQUENCY NOTATION definition and CTS Table 1.2. Any Surveillance Frequencies altered by the elimination of the definition and table will be addressed in a DOC for the affected section. This change is administrative because it does not change any SR frequencies.	N/A	1.21, Table 1.2
1.0 A.13	CTS Section 1.0 provides definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME. ITS Section 1.1 modifies the definitions to more fully describe how the tests are performed. The ITS states that the "response time test may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured." Currently, the CTS does not describe this manner of testing. This change is administrative because the ITS definitions are consistent with current plant practices. Also, the definitions are consistent with the guidance provided in IEEE 338-1977, Section 6.3.4, "Response Time Verification Tests," although CNP is not committed to this standard. The results of the test are unaffected by this allowance. This change is administrative as it does not result in a technical change to the response time tests.	1.1	1.23, 1.22
1.0 A.14	The CTS defines TRIP ACTUATING DEVICE OPERATIONAL TEST as "A TRIP ACTUATING DEVICE OPERATIONAL TEST shall consist of operating the Trip Actuating Device and verifying OPERABILITY of alarm, interlock, and/or trip functions. The TRIP ACTUATING DEVICE OPERATIONAL TEST shall include adjustment, as necessary, of the Trip Actuating Device such that it actuates at the required setpoint within the required accuracy." ITS defines TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) as "A TADOT shall consist of operating the trip actuating device and verifying OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device such that it actuates at the required setpoint within the required accuracy. The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS. The CTS definition states that the TRIP ACTUATING DEVICE OPERATIONAL TEST shall "verify OPERABILITY of alarm, interlock, and/or trip functions." The ITS states that the TADOT shall "verify the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY." The ITS states, "The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps." Currently, the CTS does not describe this manner of testing. These changes are administrative changes and do not result in technical changes to the CTS.	1.1	1.40

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.15	ITS Section 1.1 provides definitions of ACTUATION LOGIC TEST, MASTER RELAY TEST, and SLAVE RELAY TEST. These terms are used as defined terms in the ITS but do not appear in the CTS. This change does not impose any new requirements or alter existing requirements. Any technical changes due to the addition of these terms and definitions will be addressed in the DOCs for the sections of the Technical Specifications in which the terms are used. These changes are administrative as they add defined terms which involve no technical change to the Technical Specifications.	1.1	N/A
1.0 A.16	CTS Table 1.1, OPERATIONAL MODES, is revised. The corresponding table in ITS Section 1.1 is Table 1.1-1, MODES. The changes to the CTS are: The CTS Table 1.1 minimum average reactor coolant temperature for MODES 1 and 2 is changed from ≥ 350°F to "NA" (not applicable) in ITS Table 1.1-1. The CTS Table 1.1 MODE 6 upper limit on average reactor coolant temperature (≤ 140°F) is removed. In ITS Table 1.1-1, the MODE 6 average reactor coolant temperature limit is specified as "NA" (not applicable). The CTS Table 1.1 % RATED THERMAL POWER limit of 0% for MODES 3, 4, 5, and 6 is changed in ITS Table 1.1-1 to "NA" (not applicable). These changes are administrative because they result in no technical changes to the Technical Specifications.	Table 1.1-1	Table 1.1
1.0 A.17	ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on ITS usage that is not applicable to the CTS. The added sections are: Section 1.2 - Logical Connectors, which provides specific examples of the logical connectors "AND" and "OR" and the numbering sequence associated with their use. Section 1.3 - Completion Times, which provides guidance on the proper use and interpretation of Completion Times. The section also provides specific examples that aid in the use and understanding of Completion Times. Section 1.4 - Frequency, which provides guidance on the proper use and interpretation of Surveillance Frequencies. The section also provides specific examples that aid in the use and understanding of Surveillance Frequency. This change aids in the understanding and use of the format and presentation style of the ITS. The addition of these sections does not add or delete technical requirements, and will be discussed specifically in those Technical Specifications where application of the added sections results in a change. These changes are administrative because they result in no technical changes to the Technical Specifications.	1.2, 1.3, 1.4	N/A

Table A - Administrative Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 A.18	Unit 2 CTS Section 1.0 includes a CHANNEL FUNCTIONAL TEST definition for bistable channels. The definition of CHANNEL FUNCTIONAL TEST for bistable channels requires "the injection of a simulated signal into the channel sensor to verify OPERABILITY including alarm and/or trip functions." However, this CTS definition is essentially duplicative of the TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) definition. Additionally, this part of the CHANNEL FUNCTIONAL TEST definition is not included in the Unit 1 CTS. ITS Section 1.1 does not include this definition, since the requirements for bistable channels are covered by the TADOT definition. This change is administrative because the TADOT definition adequately covers bistable channels, and does not impose any new requirements or alter any existing requirements. This change is categorized as administrative because the bistable portion of the definition is duplicative of the TADOT definition.	N/A	Unit 2 1.11

Table A - Administrative Changes
ITS Chapter 2.0 - Safety Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
2.0 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	2.0	2.1, 6.7
2.0 A.2	CTS 2.1.1 references a curve providing limits on THERMAL POWER, pressurizer pressure, and the highest operating loop coolant average temperature (Tavg) "for 4 loop operation." ITS 2.1.1 does not contain this amplifying information. This change is administrative because the requirements have not changed. Both the ITS (ITS 3.4.4) and the CTS (CTS 3/4.4.1.1) require all four loops to be in operation in the applicable MODES (MODES 1 and 2). This change is administrative because it eliminates redundant information in the CTS.	N/A	2.1.1
2.0 A.3	In the event that a safety limit is violated, CTS 6.7.1.a requires the NRC Operations Center to be notified by telephone within one hour, CTS 6.7.1.b requires a Safety Limit Violation Report to be prepared and specifies the information the report must contain, CTS 6.7.1.c requires the report to be submitted to the NRC, and CTS 6.7.1.d precludes resumption of operation of the unit until authorized by the NRC. The ITS does not specify any of these requirements. These deletions are administrative since the actual requirements are not being changed. These CTS requirements are duplicative of those currently located in 10 CFR 50.36(c)(1). Since CNP is required by the Operating License to comply with 10 CFR 50, the deletion of these requirements from the Technical Specifications is administrative These changes are administrative because they result in no technical changes to the Technical Specifications.	N/A	6.7.1.a, 6.7.1.b, 6.7.1.c, 6.7.1.d

Table A - Administrative Changes
ITS Section 3.0 - LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative because they result in no technical changes to the Technical Specifications.	3.0	3/4.0
3.0 A.2	CTS 3.0.1 states, "Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, except as provided in Specification 3.0.6." ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7." This results in several changes to the CTS. Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "Limiting Conditions for Operation" is changed to "LCOs" and "OPERATIONAL MODES or other conditions specified" is changed to "MODES or other specified conditions" to be consistent with the ITS definition of MODE and the terminology used in the ITS. The phrase ". . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . ." is moved from CTS 3.0.1 to ITS LCO 3.0.2 which states that when an LCO is not met, the Required Actions must be met. The phrase "shall be applicable" is replaced in ITS LCO 3.0.1 with the phrase "shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (i.e., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (i.e., the requirements in the LCO apply). The phrase "except as provided in Specification 3.0.6" is replaced in ITS LCO 3.0.1 with the phrase "except as provided in LCO 3.0.2 and LCO 3.0.7." ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. CTS 3.0.6 (ITS LCO 3.0.5) does not modify ITS LCO 3.0.1 since the ACTION requirements discussion that is in CTS 3.0.1 has been moved to ITS LCO 3.0.2, as described above. These changes are administrative because they are editorial and result in no technical changes to the Technical Specifications.	LCO 3.0.1	3.0.1

Table A - Administrative Changes
ITS Section 3.0 - LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.3	CTS 3.0.2 states, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, except as provided in Specification 3.0.6. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." ITS LCO 3.0.2 states "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This results in several changes to the CTS. The first sentence in CTS 3.0.2 states, in part, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the specification." This requirement is divided into portions of ITS LCO 3.0.1, "LCOs shall be met" and ITS LCO 3.0.2, "Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met." The CTS 3.0.2 term "Specification 3.0.6" has been changed in ITS LCO 3.0.2 to "LCO 3.0.5" due to renumbering and consistency with the terminology in the ITS. CTS 3.0.2 is revised to include an exception for ITS LCO 3.0.6. LCO 3.0.6 is a new allowance that takes exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements. The second sentence of CTS LCO 3.0.2 states "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The sentence is replaced in ITS LCO 3.0.2 with "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." These changes are administrative because they are editorial and do not result in technical changes to the Technical Specifications.	LCO 3.0.2	3.0.2

Table A - Administrative Changes
ITS Section 3.0 - LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.4	CTS LCO 3.0.3 is applicable "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions. ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken. ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The CTS do not contain requirements that direct entry into LCO 3.0.3. The ITS does contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected Technical Specifications. These changes are administrative because they result in no technical changes to the Technical Specifications.	LCO 3.0.3	3.0.3
3.0 A.5	CTS 3.0.3 states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS LCO 3.0.3 states the time limits (Completion Times) from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3. The stated times in CTS 3.0.3 and ITS LCO 3.0.3 are listed below: Current Mode: a) CTS time to enter MODE – 1 hour to begin action; b) ITS time to enter MODE – 1 hour to begin action. MODE 3 (Hot Standby): a) CTS time to enter MODE – within the next 6 hours; b) ITS time to enter MODE – 7 hours. MODE 4 (Hot Shutdown): a) CTS time to enter MODE – within the following 6 hours; b) ITS time to enter MODE – 13 hours. MODE 5 (Cold Shutdown): a) CTS time to enter mode – within the subsequent 24 hours; b) ITS time to enter MODE – 37 hours. These changes are administrative as they implement the editorial conventions used in the ITS without resulting in technical changes to the Technical Specifications.	LCO 3.0.3	3.0.3
3.0 A.6	CTS 3.0.3 states "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required." These changes are administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.	LCO 3.0.3	3.0.3

Table A - Administrative Changes
ITS Section 3.0 - LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.7	Not used.		
3.0 A.8	CTS 3.0.6 has a statement that CTS 3.0.6 is an exception to both CTS 3.0.1 and CTS 3.0.2. ITS LCO 3.0.5 includes only a statement that ITS LCO 3.0.5 is an exception to LCO 3.0.2. The statement that ITS LCO 3.0.5 is an exception to LCO 3.0.1 is not included. This change is administrative since ITS LCO 3.0.5 does not modify ITS LCO 3.0.1. The ACTION requirements discussion that is in CTS 3.0.1 has been moved to ITS LCO 3.0.2 (i.e., it is not included in ITS LCO 3.0.1). This change is administrative since it does not result in any technical change to the Technical Specifications.	N/A	3.0.6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.9	ITS LCO 3.0.6 is added to the CTS to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). LCO 3.0.6 states "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.13, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2." In the CTS, based on the intent and interpretation provided by the NRC over the years, there has been an ambiguous approach to the combined support/supported inoperability. Some of this history is summarized below: Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination) would indicate an intent/interpretation consistent with the proposed LCO 3.0.6, without the necessity of also requiring additional ACTIONS. That is, only the inoperable support system ACTIONS need be taken. Guidance provided by the NRC in their April 10, 1980, letter to all Licensees, regarding the definition of OPERABILITY and its impact as a support system on the remainder of the CTS, would indicate a similar philosophy of not taking ACTIONS for the inoperable supported equipment. However, in this case, additional actions (similar to the proposed Safety Function Determination Program actions) were addressed and required. Generic Letter 91-18 and a plain-English reading of the CTS provide an interpretation that inoperability, even as a result of a Technical Specification support system inoperability, requires all associated ACTIONS to be taken. Certain CTS contain ACTIONS such as "Declare the {supported system} inoperable and take the ACTIONS of {its Specification}." In many cases, the supported system would likely already be considered inoperable. The implication of this presentation is that the ACTIONS of the inoperable supported system would not have been taken without the specific direction to do so. Considering the history of misunderstandings in this area, the WOG STS, NUREG-1431, Rev. 2, was developed with Industry input and approval of the NRC to include LCO 3.0.6 and a new program, Specification 5.5.13, "Safety Function Determination Program (SFDP)." This change is administrative since its function is to clarify existing ambiguities and to maintain actions within the realm of previous interpretations. This change is administrative because it does not technically change the Technical Specifications.	LCO 3.0.6	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.10	ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states "Test Exception LCO 3.1.8, "PHYSICS TESTS Exceptions - MODE 2," allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications." This change is administrative because it does not technically change the Technical Specifications.	LCO 3.0.7	N/A
3.0 A.11	The first sentence of CTS 4.0.3 states "Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification." The last sentence of CTS 4.0.3 states "Surveillance Requirements do not have to be performed on inoperable equipment." CTS 4.0.1 contains similar requirements, in that it states, in part, "Failure to perform surveillance within the specified frequency shall be failure to meet the Limiting Condition for Operation, except as provided in Specification 4.0.3." Furthermore, CTS 4.0.1 states "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." ITS SR 3.0.1 states "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes to the CTS are: The first sentence of CTS 4.0.3 states "Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification." This information is consistent with the current wording in CTS 4.0.1 and proposed ITS SR 3.0.1. ITS SR 3.0.1 states "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3." CTS 4.0.3 states, in part, "Surveillance requirements do not have to be performed on inoperable equipment." CTS 4.0.1 includes this allowance, but also states that Surveillances do not have to be performed on variables outside specified limits. ITS SR 3.0.1 states "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The allowance in CTS 4.0.3 is duplicative of the allowance in CTS 4.0.1. This changes the CTS by incorporating the allowance of CTS 4.0.3 into CTS 4.0.1 (ITS SR 3.0.1). These changes are administrative because they move and clarify information within the Technical Specifications with no change in intent.	SR 3.0.1	4.0.1, 4.0.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 A.12	CTS 4.0.2 states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in several changes to the CTS. ITS SR 3.0.2 adds to the CTS "For Frequencies specified as 'once,' the above interval extension does not apply." This is described in DOC M.1. ITS SR 3.0.2 adds to the CTS "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L.3. CTS 4.0.2 states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met. ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications. ITS SR 3.0.2 adds to the CTS "Exceptions to this Specification are stated in the individual Specifications." The changes are administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.	SR 3.0.2	4.0.2

Table A - Administrative Changes
ITS Section 3.1 - Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.1	3/4.1.1.1, 3/4.1.1.2
3.1.1 A.2	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3, and 4. CTS 3.1.1.2 provides SDM requirements in MODE 5. ITS 3.1.1 provides SDM requirements in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements for MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. The change in Applicability for MODE 1 and MODE 2 with k_{eff} ≥ 1.0 are described in DOC A.3. This change is administrative because the requirements have not changed. Combining the Specifications is an editorial change. Any technical changes resulting from this combination are discussed in other DOCs. This change is administrative because it does not result in a technical change to the CTS.	3.1.1	3.1.1.1
3.1.1 A.3	CTS 3.1.1.1 provides SDM requirements in MODES 1, 2, 3, and 4. CTS 4.1.1.1.1.b states that when in MODES 1 and 2 with k_{eff} ≥ 1.0, verify that the control bank withdrawal is within the limits of Specification 3.1.3.5 (Unit 1) and Specification 3.1.3.6 (Unit 2), Control Rod Insertion Limits. ITS 3.1.1 is Applicable in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5. ITS 3.1.6 contains the control bank insertion requirements. This changes the CTS by dividing the SDM requirements and placing those applicable in MODE 2 with k_{eff} < 1.0 and MODES 3, 4, and 5 in ITS 3.1.1 and placing those applicable in MODE 1 and MODE 2 with k_{eff} ≥ .0 in the control bank Specifications. Any changes to the rod insertion limit requirements are discussed in DOCs for those Specifications. This change is administrative because it does not result in a technical change to the CTS.	3.1.1 Applicability, 3.1.6 Applicability	3.1.1.1, 4.1.1.1.1.b
3.1.1 A.4	The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, and 4 with a footnote for MODE 2 stating "See Special Test Exception 3.10.1." ITS 3.1.1 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the user that a Special Test Exception exists that may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	N/A	3.1.1.1
3.1.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.2	3/4.1.1.2

Table A - Administrative Changes
ITS Section 3.1 - Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.2 A.2	CTS 4.1.1.1.2 requires the overall core reactivity balance be compared to predicted values to demonstrate agreement within +/- 1% Δk/k. However, this Surveillance is currently part of the SHUTDOWN MARGIN Specification. A new LCO, ITS LCO 3.1.2, requires the measured core reactivity to be within +/- 1% Δk/k of predicted values. This changes the CTS by having a separate Specification for the Core Reactivity requirement. This change is administrative because the requirements have not changed. Converting the requirement from a Surveillance in the SHUTDOWN MARGIN Specification to an LCO is consistent with the ITS format and content guidance. Any technical changes resulting from this change are discussed in other DOCs. This change is administrative because it does not result in a technical change to the CTS.	3.1.2	4.1.1.1.2
3.1.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.3	3/4.1.1.4
3.1.3 A.2	CTS 3.1.1.4 refers to the BOL MTC limit and the EOL MTC limit. ITS 3.1.3 refers to these values as the upper MTC limit and lower MTC limit, respectively. This change is administrative because the requirements have not changed. The BOL MTC value is the most positive, upper limit and the EOL MTC value is the most negative, lower limit. The terminology used in the ITS is an editorial preference selected for consistency with that used in NUREG-1431. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	3.1.3	3.1.1.4
3.1.3 A.3	The Applicability of CTS 3.1.1.4 is modified by footnote # stating "See Special Test Exception 3.10.4." ITS 3.1.3 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the reader that a Special Test Exception exists that may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS	N/A	3.1.1.4 Applicability
3.1.3 A.4	CTS 3.1.1.4 Action a.1 states that if the MTC is more positive than the BOL (i.e., upper) limit, control rod withdrawal limits must be imposed within 24 hours or the unit must be in HOT STANDBY within the next 6 hours. ITS 3.1.3 ACTION A states that with the MTC not within the upper limit, establish administrative control rod withdrawal limits within 24 hours or ACTION B requires the unit to be in MODE 2 with k_{eff} < 1.0 within the next 6 hours. This changes the CTS by requiring the plant to be in MODE 2 with k_{eff} < 1.0 instead of HOT SHUTDOWN (i.e., MODE 3). This change is administrative because it does not result in a technical change to the CTS.	3.1.3 ACTION B	3.1.1.4 Action a.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 A.5	CTS 3.1.1.4 Action a.1 states that if the MTC is more positive than the BOL limit, then control rod withdrawal limits must be established. It also states that these withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.5 (Unit 1) and Specification 3.1.3.6 (Unit 2). The ITS does not include this sentence. This change is administrative because the requirements have not changed. The CTS reference to Specification 3.1.3.5 (Unit 1) and Specification 3.1.3.6 (Unit 2) is an "information only" statement that neither adds, eliminates, or modifies requirements. The ITS convention is to not include these types of statements. This change is administrative because it does not result in a technical change to the CTS.	N/A	3.1.1.4 Action a.1
3.1.3 A.6	CTS Figure 3.1-2 provides the maximum upper limit for MTC from 0% to 100% RATED THERMAL POWER (RTP). The Figure indicates that the value for MTC can vary from - 3.00 to 1.00 x 10^4 Δk/k/°F. ITS Figure 3.1.3-1 includes the same curve however the range has changed to -2.00 to 1.00 (x 10^{-4} Δk/k/°F). This changes the CTS by using the correct exponential (10^4 in the CTS to 10^{-4} in the ITS) and changing the range for MTC. This change is administrative because it does not result in a technical change to the CTS.	Figure 3.1.3-1	Figure 3.1-2
3.1.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.4	3/4.1.3.1, 3/4.1.3.3 (Unit 1), 3/4.1.3.4 (Unit 2), 4.1.1.1.1, 4.1.1.2
3.1.4 A.2	CTS 3.1.3.1 specifies the rod misalignment limits for full length (shutdown and control) rods at a THERMAL POWER > 85% RATED THERMAL POWER (RTP) and at THERMAL POWER ≤ 85% RTP. At a THERMAL POWER > 85% RTP the allowed rod misalignment is +/- 12 steps or as determined from Figure 3.1-4. In addition, CTS 3.1.3.1 states that Figure 3.1-4 permits an allowed rod misalignment from +/- 13 steps (for ALLOWABLE POWER LEVEL (APL) equal to 101%) to +/- 18 steps (for APL greater or equal to 106%) provided the value of R (defined in Figure 3.1-4) is ≥ 1.04. The R limit and definition are maintained in the ITS 3.1.4 Note and the range of rod misalignment allowed is maintained in ITS Figure 3.1.4-1. ITS LCO 3.1.4 states that with THERMAL POWER > 85% RTP, the individual rod positions shall be within 12 steps of their group step counter demand position or as determined from Figure 3.1.4-1, and the Note to ITS LCO 3.1.4 states the R limit and provides the definition. ITS LCO 3.1.4 does not contain the allowed misalignment range and ITS Figure 3.1.4-1 does not include the R limit or definition. This change is administrative because it does not result in technical changes to the CTS.	LCO 3.1.4, Figure 3.1.4-1	3.1.3.1
3.1.4 A.3	The Applicability of CTS 3.1.3.1 is modified by footnote * that states "See Special Test Exceptions 3.10.2 and 3.10.4" (Unit 1) and "See Special Test Exceptions 3.10.2 and 3.10.3" (Unit 2). ITS 3.1.4 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The purpose of the footnote reference is to alert the user that a Special Test Exception exists that may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is administrative because it does not result in technical changes to the CTS.	N/A	3.1.3.1 Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 A.4	CTS 3.1.3.1 Action c.1 states that with one full length rod misaligned from the group step counter demand position by more than the rod misalignment requirements, POWER OPERATION may continue provided that within one hour, the affected rod is restored to OPERABLE status within the above alignment requirements, the THERMAL POWER level is reduced to less than or equal to 85% RTP for rod misalignments less than or equal to ± 18 steps, or other compensatory measures described in the Action are taken. ITS 3.1.4 does not contain a Required Action stating that the rod must be restored to OPERABLE status within the alignment limits. This change is administrative because it does not result in technical changes to the CTS.	N/A	3.1.3.1 Action c.1
3.1.4 A.5	CTS 3.1.3.1 Action c.2.e) states that with one full length rod misaligned from the group step counter demand position by more than the rod misalignment requirements, POWER OPERATION may continue provided that the remainder of the rods in the same group as the inoperable rod are aligned to within the allowed rod misalignment of the inoperable rod within one hour while maintaining the rod sequence and insertion limits as specified in the COLR; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.5 (Unit 1) and Specification 3.1.3.6 (Unit 2) during subsequent operation. ITS 3.1.4 does not contain a Required Action stating that the remainder of the rods in the group must be aligned with the misaligned rod. This change is administrative because it does not result in technical changes to the CTS.	N/A	3.1.3.1 Action c.2.e)
3.1.4 A.6	CTS Figure 3.1-4, Allowed Rod Misalignment above 85% RTP, is based upon the current Allowable Power Level (APL) as determined in CTS 3.2.6. In addition, CTS 4.1.3.1.3 requires the allowed rod misalignment for THERMAL POWER > 85% RTP to be determined in conjunction with the measurement of APL as defined in CTS 4.2.6.2. The term APL has been changed to $F^W_Q(Z)$, as described in the DOCs for ITS 3.2.1. Therefore, in the ITS, the allowed rod misalignment is being based upon $F^W_Q(Z)$. In order to maintain a similar value in the ITS Figure as is in the CTS Figure, the term in ITS Figure 3.1.4-1 is (CFQ x K(Z))/$F^W_Q(Z)$. In addition, the ITS does not include a specific SR in ITS 3.1.4 to calculate the new allowed rod misalignment every time an $F^W_Q(Z)$ determination is made. This changes the CTS by using the term $F^W_Q(Z)$ in lieu of the term APL, and not including a specific SR to calculate the allowed rod misalignment every time $F^W_Q(Z)$ is determined. This change is administrative because it does not result in a technical change to the CTS	Figure 3.1.4-1	Figure 3.1-4, 4.1.3.1.3
3.1.4 A.7	The CTS 3.1.3.3 (Unit 1) and CTS 3.1.3.4 (Unit 2) Action requires that with the drop time of any full length rod determined to exceed the limits of the LCO, to restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2. The ITS does not have a similar requirement. CTS 4.0.4 and ITS SR 3.0.4 require verification that Surveillances are met prior to entering the MODE in which they apply. CTS 4.0.4 and ITS SR 3.0.4 also prohibit entering a MODE or condition with the Surveillance not met and while relying on Actions. Therefore, since the Applicability of CTS 3.1.3.3 (Unit 1) and CTS 3.1.3.4 (Unit 2) is MODES 1 and 2, the Action prohibiting entry into MODES 1 and 2 with the rod drop time requirements not met is redundant to CTS 4.0.4 and ITS SR 3.0.4. This change is administrative because it does not result in technical changes to the CTS.	N/A	3.1.3.3 (Unit 1), 3.1.3.4 (Unit 2)

Table A - Administrative Changes
ITS Section 3.1 - Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.5	3.1.3.4 (Unit 1), 3.1.3.5 (Unit 2)
3.1.5 A.2	The Applicability of CTS 3.1.3.4 (Unit 1) and CTS 3.1.3.5 (Unit 2) is modified by footnote * that states "See Special Test Exceptions 3.10.2 and 3.10.4" (Unit 1) and "See Special Test Exceptions 3.10.2 and 3.10.3" (Unit 2). ITS 3.1.5 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The purpose of the footnote reference is to alert the user that Special Test Exceptions exist that may modify the Applicability of the Specification. This change is administrative because it is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	N/A	3.1.3.4 Applicability (Unit 1), 3.1.3.5 Applicability (Unit 2)
3.1.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.6	3/4.1.3.5 (Unit 1), 3/4.1.3.6 (Unit 2) 4.1.1.1.1.b, 4.1.1.1.1.c
3.1.6 A.2	The Applicability of CTS 3.1.3.5 (Unit 1) and CTS 3.1.3.6 (Unit 2) is modified by footnote * that states "See Special Test Exceptions 3.10.2 and 3.10.4" (Unit 1) and "See Special Test Exceptions 3.10.2 and 3.10.3" (Unit 2). ITS 3.1.6 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The purpose of the footnote reference is to alert the user that Special Test Exceptions exist that may modify the Applicability of the Specification. This change is administrative because it is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	N/A	3.1.3.5 Applicability (Unit 1), 3.1.3.6 Applicability
3.1.6 A.3	CTS 3.1.3.5 Actions a and b (Unit 1) and CTS 3.1.3.6 Actions a and b (Unit 2) state that with the control banks inserted beyond the insertion limits, restore the control banks to within the insertion limits within two hours or reduce the THERMAL POWER within 2 hours to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the group position using the insertion limits specified in the COLR. ITS 3.1.6 Required Action A.2 requires the control bank to be restored to within limits within 2 hours. This changes the CTS by eliminating the explicit statement that compliance with the LCO can be restored in order to exit the Action. This change is administrative because the technical requirements have not changed.	N/A	3.1.3.5 Action b (Unit 1), 3.1.3.6 Action b (Unit 2)

Table A - Administrative Changes
ITS Section 3.1 - Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 A.4	CTS 3.1.3.5 Action c (Unit 1) and CTS 3.1.3.6 Action c (Unit 2) require the unit to be in HOT STANDBY within 6 hours if Actions a or b are not met. The CTS Applicability is MODE 1 and 2 with $k_{eff} \geq 1.0$. ITS 3.1.6 ACTION C requires the unit to be in MODE 2 with $k_{eff} < 1.0$ within 6 hours. This changes the CTS by requiring the plant to be in MODE 2 with $k_{eff} < 1.0$ instead of HOT SHUTDOWN (i.e., MODE 3). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.6 ACTION C	3.1.3.5 Action c (Unit 1), 3.1.3.6 Action c (Unit 2)
3.1.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.7	3/4.1.3.2
3.1.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.1.8	3/4.10.4 (Unit 1), 3/4.10.3 (Unit 2)
3.1.8 A.2	CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) state that the limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS. ITS LCO 3.1.8 includes an allowance to reduce the required number of channels for ITS LCO 3.3.1, "RTS Instrumentation," Function 2 (Power Range Neutron Flux), Function 3 (Power Range Neutron Flux Rate), Function 6 (Overtemperature ΔT), and Function 18.d (Power Range Neutron Flux, P-10), from "4" to "3." This changes CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) by adding an allowance to reduce the number of required RTS channels from "4" to " 3" for the specified Functions. This change is administrative because it does not result in technical changes to the CTS.	LCO 3.1.8	3.10.4 (Unit 1), 3.10.3 (Unit 2)
3.1.8 A.3	CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) state that the limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS provided the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set at ≤ 25% of RATED THERMAL POWER. ITS 3.1.8 states that the requirement of certain Specifications may be suspended but contains no requirements on the Intermediate and Power Range Channels. The ITS contains the same requirements on the Intermediate and Power Range Channels in ITS LCO 3.3.1. This changes the CTS by eliminating the requirement that the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are set at ≤ 25% of RATED THERMAL POWER from the test exception. This change is administrative because the Reactor Trip Setpoints on the OPERABLE Intermediate and Power Range Channels are contained in ITS LCO 3.3.1, "RTS Instrumentation." Repeating that requirement in the test exception LCO is unnecessary. This change is administrative as it eliminates a repeated requirement from the CTS, resulting in no technical change to the CTS.	3.3.1	3.10.4 (Unit 1), 3.10.3 (Unit 2)

Table A - Administrative Changes
ITS Section 3.1 - Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.8 A.4	CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) are applicable in MODE 2. ITS 3.1.8 is applicable "During PHYSICS TESTS initiated in MODE 2." This changes the CTS such that the Specification is applicable in MODE 2 only when a PHYSICS TEST is initiated. This change is administrative because it clarifies the current wording of the Specification with no change in intent.	3.1.8 Applicability	3.10.4 (Unit 1), 3.10.3 (Unit 2)

Table A - Administrative Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.2.1	3/4.2.2, 3/4.2.6
3.2.1 A.2	ITS 3.2.1, Required Actions A.2.1, A.2.2, and A.2.3 state that the Required Actions must be taken "after each $F^C_Q(Z)$ determination." CTS 3.2.2, Action a does not explicitly state this requirement. This change is administrative because it does not result in a technical change to the Technical Specifications. The CTS is understood to apply after each measurement of $F_Q(Z)$. This change is administrative because it does not result in a technical change to the CTS.	3.2.1 Required Actions A.2.1, A.2.2, and A.2.3	N/A
3.2.1 A.3	CTS 4.2.2.1 states "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement. The purpose of a CTS 4.0.4 exception is to allow the plant to enter the MODE of Applicability without performing the required Surveillances. This change is administrative because the CTS 4.0.4 exception is not necessary. The ITS SR 3.2.1.1 Frequencies are written to allow entry into MODE 1 following a reactor startup. This serves the same purpose as the CTS 4.0.4 exception. This change is administrative because it eliminates a CTS provision which is covered in the ITS in an alternate manner.	SR 3.2.1.1	4.2.2.1
3.2.1 A.4	CTS 3/4.2.6 provides a limit, Actions, and Surveillances for the Allowable Power Level (APL). The CTS requires the APL to be greater than THERMAL POWER, and if not, requires the THERMAL POWER to be reduced to APL or less of RATED THERMAL POWER (RTP). It further requires a reduction in the Power Range Neutron Flux - High and Overpower ΔT Trip Setpoints by the same percentage by which APL is below RTP. Surveillance Requirements are provided to periodically confirm APL is within limits. ITS 3.2.1 uses the term $F^W_Q(Z)$, consistent with NUREG-1431, Rev. 2, in lieu of the term APL. The ITS limit for $F^W_Q(Z)$ is provided in the COLR. If the $F^W_Q(Z)$ limit is not met, the ITS Required Actions are to reduce THERMAL POWER by ≥ 1% for each 1% that $F^W_Q(Z)$ exceeds its limit, and to reduce the trip setpoints by ≥ 1% for each 1% that $F^W_Q(Z)$ exceeds its limit. In addition, the ITS Surveillances periodically confirm $F^W_Q(Z)$ is within limit. This changes the CTS by substituting the term $F^W_Q(Z)$ for the term APL and modifies the Actions accordingly This change is administrative change since conversion to the term $F^W_Q(Z)$ does not result in any technical changes.	3.2.1	3/4.2.6
3.2.1 A.5	CTS 4.2.6.2 requires APL (changed to $F^W_Q(Z)$ per DOC A.4) to be determined "in conjunction with the target flux difference and target band determination." The ITS does not include this cross-reference to the Surveillances of ITS 3.2.3 (the AFD Specification). This changes the CTS by deleting the cross-reference to the AFD Specification. This change is administrative because it does not result in a technical change to the CTS.	SR 3.2.1.2	4.2.6.2

Table A - Administrative Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.2.2	3/4.2.3
3.2.2 A.2	CTS 3.2.3 Action c states that with $F^N_{\Delta H}$ exceeding its limit "identify and correct the cause of the out-of-limit condition prior to increasing THERMAL POWER." ITS 3.2.2 does not include this requirement. This changes the CTS by eliminating the statement that the cause of the out-of-limit condition must be identified and corrected prior to increasing power. This change is administrative because it does not result in technical changes to the CTS.	N/A	3.2.3 Action c
3.2.2 A.3	CTS 3.2.3 Action c states that with $F^N_{\Delta H}$ exceeding its limit, $F^N_{\Delta H}$ must be demonstrated to be within its limit prior to exceeding 50% RTP and 75% RTP, and within 24 hours of exceeding 95% RTP. ITS 3.2.2 Required Action A.4 contains the same requirements. However, ITS 3.2.2 Required Action A.4 is modified by a Note which states "THERMAL POWER does not have to be reduced to comply with this Required Action." This modifies the CTS by adding a Note stating that THERMAL POWER does not have to be reduced to comply with the Required Action. This change is administrative because it does not result in technical changes to the CTS.	3.2.2 Required Action A.4 Note	3.2.3 Action c
3.2.2 A.4	CTS 4.2.3.c states "The provisions of Specification 4.0.4 are not applicable." The ITS does not include this statement. In addition, CTS 4.2.3.b requires the $F^N_{\Delta H}$ to be determined at least once per 31 Effective Full Power Days. The ITS SR 3.2.2.1 Frequency is 31 EFPD thereafter. This changes the CTS by adding the word "thereafter" to the Frequency. This change is administrative because it does not result in technical changes to the CTS.	SR 3.2.2.1	4.2.3.c, 4.2.3.b
3.2.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.2.3	3/4.2.1, 4.2.6.2.a, 4.2.6.2.b
3.2.3 A.2	The CTS 3.2.1 Applicability is MODE 1 above 50% RATED THERMAL POWER. However, CTS 4.2.1.2.b provides a penalty deviation for operation outside of the target band at THERMAL POWER levels between 15% RTP and 50% RTP. The ITS 3.2.3 Applicability is MODE 1 with THERMAL POWER > 15% RTP, and ITS LCO 3.2.3.c states that the AFD may deviate outside the target band with THERMAL POWER < 50% RTP. This changes the CTS by clearly stating that the AFD limit is Applicable between 15% RTP and 50% RTP, but that there is no maximum time limit it can be outside the limit; only the time has to be tracked (so that it can be used for the LCO 3.2.3.b limit). These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.2.3.c, 3.2.3 Applicability	3.2.1 Applicability, 4.2.1.2.b

Table A - Administrative Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.3 A.3	The Applicability of CTS 3.2.1 is modified by a footnote * stating "See Special Test Exception 3.10.2." ITS 3.2.3 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the CTS 3.2.1 footnote * reference is to alert the user that a Special Test Exception exists which may modify the Applicability of the Technical Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is an administrative change because it does not result in technical changes to the CTS.	N/A	3.2.1 Applicability footnote *
3.2.3 A.4	CTS 3.2.1 Action b states "THERMAL POWER shall not be increased above 90% or 0.9 x APL (whichever is less) of RATED THERMAL POWER unless the indicated AFD is within the target band and ACTION 2.a)1), above has been satisfied." CTS 3.2.1 Action c states "THERMAL POWER shall not be increased above 50% of RATED THERMAL POWER unless the indicated AFD has not been outside of the target band for more than 1 hour penalty deviation cumulative during the previous 24 hours." ITS 3.2.3 does not contain similar requirements. This changes the CTS by eliminating prohibitions contained in the CTS. This change is an administrative change because it does not result in a technical change to the CTS.	LCO 3.0.4	3.2.1 Actions b and c
3.2.3 A.5	CTS 4.2.1.4 states that the allowable values of the target band are specified in the COLR. The ITS does not include this statement in ITS SR 3.2.3.2. This change deletes the statement from the CTS Surveillance concerning where the target band limits are located. The CTS 4.2.1.4 statement identifies the location of the target band limit. However, this statement is duplicative of ITS LCO 3.2.1, which already identifies the location of the target band limit (the COLR). Therefore, the deletion of the duplicative and redundant statement from the Surveillance Requirement is administrative , since it remains in the LCO statement (CTS 3.2.1 and ITS LCO 3.2.3). This change is an administrative change since it does not result in any technical change to the CTS.	LCO 3.2.3	4.2.1.4
3.2.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.2.4	3/4.2.4, 1.18
3.2.4 A.2	The Applicability of CTS 3.2.4 is modified by footnote * stating "See Special Test Exception 3.10.2." ITS 3.2.4 Applicability does not contain the footnote or a reference to the Special Test Exception. The purpose of the CTS 3.2.4 footnote * reference is to alert the user that a Special Test Exception exists which may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is an administrative change since it does not result in technical changes to the CTS.	N/A	3.2.4 Applicability footnote *

Table A - Administrative Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.4 A.3	CTS 3.2.4 Action a.1.a) states that with QPTR > 1.02 and ≤ 1.09, within 2 hours reduce the QPTR to within its limit. ITS 3.2.4 does not contain a Required Action stating QPTR must be reduced to within its limit. This change is administrative because the technical requirements have not changed. Restoration of compliance with the LCO is always an available Required Action and it is the convention in the ITS to not state such “restore” options explicitly unless it is the only action or is required for clarity. This change is an administrative change since it does not result in technical changes to the CTS.	N/A	3.2.4 Action a.1.a)
3.2.4 A.4	CTS 1.18, the definition of QPTR, states, in part, that "With one excore detector inoperable, the remaining three detectors shall be used for computing the average." ITS SR 3.2.4.1 Note 1, which incorporates the QPTR definition portion described above, states that when one Power Range Neutron Flux channel (i.e., an excore detector) is inoperable and THERMAL POWER is ≤ 75% RTP, the remaining three Power Range Neutron Flux channels can be used for calculating QPTR. This changes the CTS by specifying the allowance can only be used when ≤ 75% RTP. Therefore, this change is an administrative change since it does not result in a technical change to the CTS.	SR 3.2.4.1 Note 1	1.18

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.1	3/4.3.1, 2.2.1
3.3.1 A.2	CTS 3.3.1.1 Action and CTS Table 3.3-1 provide the compensatory actions to take when RTS instrumentation is inoperable. ITS 3.3.1 ACTIONS provide the compensatory actions for inoperable RTS Instrumentation. The ITS 3.3.1 ACTIONS includes a Note that allows separate Condition entry for each Function. In addition, due to the manner in which the titles of Functions 10, 14, 15, and 16.b are presented, separate Condition entry is allowed within a Function as follows: (a) for Function 10 (Reactor Coolant Flow - Low (per loop)) on a loop basis; (b) for Function 14 (Steam Generator (SG) Water Level - Low Low (per SG)) and Function 15 (SG Water Level Low Coincident with Steam Flow/Feedwater Flow Mismatch (per SG)) on a steam generator basis; and (c) for Function 16.b (Turbine Trip, Turbine Stop Valve Closure (per train)) on a per train basis. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable RTS instrumentation Function and for certain Functions on a loop, steam generator, or train basis. This change is administrative because it does not result in technical changes to the CTS.	3.3.1 ACTIONS Note	3.3.1.1 Action, Table 3.3-1 Actions
3.3.1 A.3	CTS Table 4.3-1 requires a CHANNEL FUNCTIONAL TEST be performed for the Functional Units 16 (Undervoltage - Reactor Coolant Pumps) and 17 (Underfrequency - Reactor Coolant Pumps) channels. CTS Table 4.3-1 requires a CHANNEL FUNCTIONAL TEST be performed for the Functional Units 18.A (Turbine Trip - Low Fluid Oil Pressure) and 18.B (Turbine Trip - Turbine Stop Valve Closure) channels. ITS Table 3.3.1-1, for Functions 12 and 13, requires performance of SR 3.3.1.10, a TADOT, and for Functions 16.a and 16.b, requires performance of SR 3.3.1.18, a TADOT. However, the Surveillances are modified by a Note that states that a verification of the setpoint is not required. This changes the CTS by explicitly stating that setpoint verification is not part of the TADOT. The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.20. This change is administrative because it does not result in a technical change to the CTS.	SR 3.3.1.11 Note, SR 3.3.1.18 Note	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements for Functional Units 16, 17, 18.A, and 18.B
3.3.1 A.4	CTS 4.3.1.1.3 states, in part, that the RTS RESPONSE TIME of each trip function shall be demonstrated to be within its limit at least once per 18 months. The requirement specifies that each test shall include at least one logic train such that both logic trains are tested at least once per 36 months, and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1. ITS SR 3.3.1.19 requires the verification of RTS RESPONSE TIME every 24 months "on a STAGGERED TEST BASIS." The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS. The extension in the Surveillance Frequency from 18 months to 24 months is discussed in DOC L.4. This change is administrative because it does not result in technical changes to the CTS.	SR 3.3.1.19	4.3.1.1.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.5	CTS Table 3.3-1 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each RTS Functional Unit. For CTS Table 3.3-1 Functional Units 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18.A, and for Unit 2 only, 18.B, the number of channels listed in the "TOTAL NO. OF CHANNELS" column is greater than that listed in the "MINIMUM OPERABLE CHANNELS" column. CTS Table 3.3-1 Actions 2, 6, and 7 specify the actions to take with the number of channels OPERABLE one less than required by the "TOTAL NO. OF CHANNELS" column. CTS Table 3.3-1 Actions 1, 3, 4, 11, 12, 14, and 15 specify the actions to take with the number of channels OPERABLE, one less than required by the "MINIMUM CHANNELS OPERABLE" column. ITS LCO 3.3.1 requires the RTS instrumentation for each Function in ITS Table 3.3.1-1 to be OPERABLE, and includes only one column titled “REQUIRED CHANNELS.” For the associated ITS Table 3.3.1-1 Functions, the number of channels listed in the "REQUIRED CHANNELS" column is equal to the number of channels listed in the CTS "TOTAL NO. OF CHANNELS" column. The ITS 3.3.1 ACTIONS require entry when the OPERABLE channels are one less than required by the "REQUIRED CHANNELS" column. For CTS Table 3.3-1 Functional Units 12, 13, 14, and 20, the description in the "CHANNELS TO TRIP" (Functional Units 12, 13, and 14 only) and "MINIMUM CHANNELS OPERABLE" columns includes the phrase "in each operating loop." This description is not included in ITS Table 3.3.1-1 Functions 10, 11, and 14. In addition, the channel requirements for CTS Table 3.3-1 Functional Unit 14 are specified on a "loop" basis and for CTS Table 3.3-1 Functional Unit 20 are specified on a "breaker" basis, while the channel requirements for ITS Table 3.3.1-1 Functions 14 and 11 are specified on a "SG" basis and "RCP" basis, respectively. For Function 14, this is shown in the title of the Function, as described in DOC A.2. Also, CTS Table 3.3-1 Functional Unit 18.B (Turbine Stop Valve Closure) specifies there are 4 channels in the "TOTAL NO. OF CHANNELS" column while the "MINIMUM CHANNELS OPERABLE" column specifies "4" for Unit 1 and "3" for Unit 2. ITS Table 3.3.1-1 Function 16.b specifies 4 channels in the "REQUIRED CHANNELS" column. This changes the CTS by a) changing the title of the "MINIMUM CHANNELS OPERABLE" column to "REQUIRED CHANNELS," b) increasing the number of channels listed to match the number listed in the "TOTAL NO. OF CHANNELS" column, c) deleting the description "in each operating loop" and adding the words "per train," as shown in the title of the Function as described in DOC A.2, d) replacing the "loop" basis with "SG" basis for the Steam Generator (SG) Water Level - Low Low Function, as shown in the title of the Function (see DOC A.2), and e) replacing the "breaker" basis with "RCP" basis for the RCP Breaker Position Function. This change is administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 "REQUIRED CHANNELS" column, 3.3.1 ACTIONS	Table 3.3-1 "TOTAL NO. OF CHANNELS," "MINIMUM CHANNELS OPERABLE," and "CHANNELS TO TRIP" columns, Table 3.3-1 Actions 1, 3, 4, 11, 12, 14, and 15
3.3.1 A.6	Not used.		

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.7	CTS Table 3.3-1 Functional Unit 2 requires the Power Range Neutron Flux channels to be OPERABLE in MODES 1 and 2. CTS Table 3.3-1 specifies that the P-10 interlock prevents or defeats the manual block of the Power Range Neutron Flux Low setpoint reactor trip. CTS Table 4.3-1 Functional Unit 2 specifies the Surveillance Requirements for the Power Range Neutron Flux channels in MODES 1 and 2. ITS Table 3.3.1-1 Function 2.a requires the Power Range Neutron Flux - High channels to be OPERABLE in MODES 1 and 2 and ITS Table 3.3.1-1 Function 2.b requires the Power Range Neutron Flux - Low channels to be OPERABLE in MODE 1 below the P-10 interlock (as indicated in ITS Table 3.3.1-1 Footnote (b)) and MODE 2. This changes the CTS by splitting CTS Table 3.3-1 Functional Unit 2 into two distinct functions, Power Range Neutron Flux - High and Power Range Neutron Flux - Low, and placing the allowances of the P-10 Function requirements associated with the Power Range Neutron Flux - Low channels into the Applicability statement. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Functions 2.a and 2.b	Tables 3.3-1 and 4.3-1 Functional Unit 2
3.3.1 A.8	CTS Tables 3.3-1 and 4.3-1 Functional Unit 5 require the Intermediate Range Neutron Flux channels to be OPERABLE in MODES 1 and 2. CTS Table 3.3-1 Action 3.a specifies that below P-6 an inoperable Intermediate Range Neutron Flux channel must be restored to OPERABLE status prior to increasing THERMAL POWER above the P-6 setpoint. CTS Table 3.3-1 specifies that the P-10 interlock prevents or defeats the manual block of the Intermediate Range Neutron Flux reactor trip when the Power Range Neutron Flux channels are < 9% RTP. ITS Table 3.3.1-1, including Footnotes (b) and (c), requires Functional Unit 4, the Intermediate Range Neutron Flux channels, to be OPERABLE in MODE 1 below the P-10 interlocks and MODE 2 above the P-6 interlocks. This changes the CTS by placing the allowances of CTS Table 3.3-1 Action 3.a and the P-10 reactor trip system interlock into the Applicability statement. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Function 4 (including footnotes (b) and (c))	Tables 3.3-1 and 4.3-1 Functional Unit 5, Table 3.3-1 Actions 3.a, Table 3.3-1 P-10 Interlock
3.3.1 A.9	CTS Table 3.3-1 Functional Unit 6 requires the Source Range Neutron Flux channels to be OPERABLE in MODE 2, as modified by CTS Table 3.3-1 Note ##. CTS Table 3.3-1 Note ## specifies that the high voltage to the Source Range Neutron Flux detectors may be de-energized above P-6. ITS Table 3.3.1-1, including Footnote (d), requires Function 5, the Source Range Neutron Flux channels, to be OPERABLE in MODE 2 below the P-6 interlock. This changes the CTS by specifically stating that the Source Range Neutron Flux channels are only required in MODE 2 below the P-6 interlock. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Function 5 (including footnote (d))	Table 3.3-1 Functional Unit 6 (including Note ##)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.10	CTS Table 3.3-1 Functional Units 9, 11, 16, 17, 18.A, and 18.B specify the requirements for Pressurizer Pressure - Low, Pressurizer Water Level - High, Undervoltage - Reactor Coolant Pumps, Underfrequency - Reactor Coolant Pumps, Turbine Trip - Low Fluid Oil Pressure, and Turbine Trip - Turbine Stop Valve Closure. The Applicability of Functional Units 9 and 11 in CTS Table 3.3-1 is MODES 1 and 2, while the Applicability of Functional Units 16, 17, 18.A, and 18.B in CTS Table 3.3-1 is MODE 1. In addition, the Applicability for the Surveillances in CTS Table 4.3-1 for Functional Units 9, 11, 16, and 17 are identical to the Applicability of the associated Function in CTS Table 3.3-1. CTS Table 3.3-1 also specifies that the P-7 interlock function prevents or defeats the automatic block of reactor trip on these channels. ITS Table 3.3.1-1 Functions 8.a, 9, 10, 12, 13, 16.a, and 16.b require the same Functions to be OPERABLE in MODE 1 above the P-7 interlock. This changes the CTS by placing the allowances of P-7 Reactor Trip System interlock into the Applicability statement for the applicable Functions. The change to the Surveillance Applicability for CTS Functional Units 18.A and 18.B is discussed in DOC A.15. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Functions 8.a, 9, 10, 12, 13, 16.a, and 16.b	Table 3.3-1 Functional Units 9, 11, 16, 17, 18.A, and 18.B, Table 3.3-1 P-7 Interlock, Table 4.3-1 Functional Units 9, 11, 16, and 17
3.3.1 A.11	CTS Table 3.3-1 Action 2 provides the actions when a Power Range Neutron Flux - High channel is inoperable. The Action, in part, requires either reducing reactor power to ≤ 75% RTP within 4 hours or monitoring the QPTR every 12 hours per Specification 4.2.4.c. This specific requirement is not included in the ITS 3.3.1 ACTIONS. ITS 3.3.1 Required Action C.2 requires performance of SR 3.2.4.2 12 hours from discovery of THERMAL POWER > 75% RTP and every 12 hours thereafter. In addition, the Required Action is only required if the Power Range Neutron Flux input to QPTR is inoperable. This changes the CTS by placing the 75% RTP restriction into the Completion Time and by explicitly stating that the Surveillance Requirement is only to be performed when the QPTR input is inoperable. This change is administrative because it is a presentation preference only and it does not result in any technical changes to the CTS.	SR 3.2.4.2	Table 3.3-1 Action 2
3.3.1 A.12	CTS Table 3.3-1 Functional Unit 21 requires two Reactor Trip Breakers to be OPERABLE, while CTS Table 4.3-1 Function 21 specifies the Surveillance Requirements for the Reactor Trip Breakers as well as the Shunt Trip and Undervoltage Trip Functions. CTS 3.3-1 Action 13 provides compensatory actions for when the undervoltage or shunt trip feature is inoperable, while Action 15 specifies the compensatory actions for when the Reactor Trip Breakers are inoperable for reasons other than an inoperable diverse trip feature. ITS 3.3.1-1 Function 19 specifies the requirements for the Reactor Trip Breakers (2 trains are required to be OPERABLE), while Function 20 specifies the requirements for the Reactor Trip Breaker Shunt Trip and Undervoltage Functions (one of each trip feature per Reactor Trip Breaker is required to be OPERABLE). This changes the CTS by splitting the Reactor Trip Breaker Functional Unit into two separate Functions, the Reactor Trip Breaker Function (Function 19) and Reactor Trip Breaker Undervoltage and Shunt Trip Mechanism Function (Function 20). This change is administrative because it does not result in a technical change to the CTS	Table 3.3.1-1 Functions 19 and 20	Tables 3.3-1 and 4.3-1 Functional Unit 21, Table 3.3-1 Actions 13 and 15

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.13	CTS Table 3.3-1 does not include any LCO requirements for the reactor trip bypass breakers. However, CTS Table 4.3-1 Functional Unit 23 includes Surveillance Requirements for these breakers, and requires them to be performed in MODES consistent with the Surveillances for the reactor trip breakers. ITS Table 3.3.1-1 Function 19 (Reactor Trip Breakers Function) includes Footnote (f), which states the Reactor Trip Breakers Function includes any reactor trip bypass breakers that are racked in and closed for bypassing a reactor trip breaker. This changes the CTS by explicitly stating when the reactor trip bypass breakers are required to be OPERABLE. This change is administrative because it does not result in any technical changes to the CTS.	Table 3.3.1-1 Function 19 Footnote (f)	Table 4.3-1 Functional Unit 23
3.3.1 A.14	CTS Table 4.3-1 requires a CHANNEL CALIBRATION of Functional Unit 8, the Overpower ΔT channels. CTS Table 4.3-1 Note 9 modifies the CHANNEL CALIBRATION requirement by specifying that the provisions of Specification 4.0.4 are not applicable for the f_2 (delta I) penalty. ITS Table 3.3.1-1 Function 7 requires the performance of a CHANNEL CALIBRATION (ITS SR 3.3.1.15) for the Overpower ΔT channels, and does not include an ITS SR 3.0.4 exception. This changes the CTS by deleting the CTS 4.0.4 allowance associated with the f_2 (delta I) penalty. This change is administrative because it does not result in a technical change to the CTS.	N/A	Table 4.3-1 Note 9
3.3.1 A.15	CTS Table 4.3-1 specifies that Surveillance Requirements for Functional Units 18.A (Turbine Trip - Low Fluid Oil Pressure) and 18.B (Turbine Trip - Turbine Stop Valve Closure) channels are to be performed in MODES 1 and 2. ITS 3.3.1 does not include any Surveillance Requirements for these Functions in MODE 2. This changes the CTS by deleting Surveillance Requirements for these Functional Units in MODE 2. This change is administrative because it does not result in a technical change to the CTS.	N/A	Table 4.3-1 Functional Units 18.A and 18.B
3.3.1 A.16	CTS Table 4.3-1, Functional Units 7 and 8 require the performance of a CHANNEL CALIBRATION of the Overtemperature ΔT and Overpower ΔT channels. ITS Table 3.3.1-1 Functions 6 and 7 also require the performance of a CHANNEL CALIBRATION (ITS SR 3.3.1.15) for the Overtemperature ΔT and Overpower ΔT channels; however, ITS SR 3.3.1.15 is modified by Note 1, which states that this Surveillance shall include verification of Reactor Coolant System (RCS) resistance temperature detector (RTD) bypass loop flow rate. This changes the CTS by adding a clarification Note to the Surveillance to ensure that RCS RTD bypass loop flow rate is verified. This change is administrative because it does not result in a technical change to the CTS.	SR 3.3.1.15 Note 1	Table 4.3-1 CHANNEL CALIBRATION requirements for Functional Units 7 and 8
3.3.1 A.17	CTS 4.3.1.1.3 requires REACTOR TRIP SYSTEM RESPONSE TIME testing of "each" reactor trip function. ITS SR 3.3.1.19 is the REACTOR TRIP SYSTEM RESPONSE TIME testing Surveillance, but in ITS Table 3.3.1-1, it is only required for Functions 2.a (Power Range Neutron Flux - High), 2.b (Power Range Neutron Flux - Low), 6 (Overtemperature ΔT), 7 (Overpower ΔT), 8.a (Pressurizer Pressure - Low), 8.b (Pressurizer Pressure - High), 9 (Pressurizer Water Level - High), 10 (Reactor Coolant Flow - Low (per loop)), 12 (Undervoltage RCPs), 13 (Underfrequency RCPs), 14 (Steam Generator Water Level - Low Low (per SG)), and 17 (SI input from ESFAS). This changes the CTS by specifically stating that the Surveillance is only applicable to certain Functions, not "each" function. This change is administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 Functions 2.a, 2.b, 6, 8.a, 8.b, 9, 10, 12, 13, 14, and 17 requirement to perform SR 3.3.1.19	4.3.1.1.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.18	CTS Table 3.3-1, including Note *, requires Functional Units 1 (Manual Reactor Trip) and 6 (Source Range, Neutron Flux) channels to be OPERABLE with the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal. In addition, CTS Table 4.3-1 requires Functional Unit 6 (Source Range, Neutron Flux) channels to be tested in MODES 3 (below P-6), 4, and 5. ITS Table 3.3.1-1, including Footnote (a), requires Functions 1 (Manual Reactor Trip) and 5 (Source Range Neutron Flux) channels to be OPERABLE in MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or with one or more rods not fully inserted. This changes the CTS by specifically stating that the CTS Table 3.3-1 Note Applicability applies in MODES 3, 4, and 5. In addition, this changes the CTS by matching the MODES the Source Range Neutron Flux channels are to be tested with the MODES in which the channels are required to be OPERABLE. The change concerning the details of the reactor trip breakers is discussed in DOC LA.3 and the change that adds the requirement concerning the position of the rods is discussed in DOC M.1. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Functions 1 and 5 (including footnote (a))	Table 3.3-1 Functional Units 1 and 6 (including Note *), Table 4.3-1 Functional Unit 6
3.3.1 A.19	CTS LCO 3.3.1.1 states that the interlocks of Table 3.3-1 shall be OPERABLE. CTS Table 3.3-1 includes the logic description, setpoint, and functional description of the P-6, P-7, P-8, and P-10 interlocks. However, no specific Applicability requirements are provided. ITS Table 3.3.1-1 specifies the Applicable MODES or other specified conditions associated with the P-6, P-7, P-8, P-10 and P-13 interlocks (Functions 18.a, b, c, d, and e). This changes the CTS by adding specific applicable MODES or other specified conditions associated with the P-6, P-7, P-8, P-10, and P-13 interlocks. This change is administrative because it does not result in a technical change to the CTS	Table 3.3.1-1 Functions 18.a, 18.b, 18.c, 18.d, and 18.e	LCO 3.3.1.1, Table 3.3-1 P-6, P-7, P-8, and P-10 Interlocks
3.3.1 A.20	CTS 4.3.1.1.1 requires that the RTS instrumentation channels be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3-1. ITS 3.3.1 requires the performance of either a CHANNEL OPERATIONAL TEST (COT), a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT), or, in the case of the Automatic Trip Logic, an ACTUATION LOGIC TEST. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to either a COT, a TADOT, or an ACTUATION LOGIC TEST. This change is administrative because it does not result in technical changes to the CTS.	SR 3.3.1.4, SR 3.3.1.5, SR 3.3.1.6, SR 3.3.1.8, SR 3.3.1.10, SR 3.3.1.11, SR 3.3.1.17, SR 3.3.1.18	4.3.1.1.1
3.3.1 A.21	CTS LCO 3.3.1.1 states that the interlocks of Table 3.3-1 shall be OPERABLE. CTS Table 3.3-1 includes the logic description, setpoint, and functional description of the P-7 interlock. ITS 3.3.1 breaks out the turbine first stage pressure portion of the P-7 interlock into its own line item, the P-13 interlock, and requires two channels to be OPERABLE. This changes the CTS by separating out the P-13 portion of the P-7 interlock. This change is administrative because it does not result in technical changes to the CTS.	Table 3.3.1-1 Functions 18.b and 18.e	LCO 3.3.1.1, Table 3.3-1 P-7 Interlock
3.3.1 A.22	CTS Table 4.3-1 specifies that Surveillance Requirements for Functional Units 12 (Loss of Flow - Single Loop) and 13 (Loss of Flow - Two Loops) are to be performed in MODE 1. ITS 3.3.1 only requires Surveillances in MODE 1 above the P-7 interlock. This changes the CTS by deleting Surveillance Requirements for the specified Functional Units in MODE 1 below P-7. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.1-1 Function 10	Table 4.3-1 Functional Units 12 and 13

Table A - Administrative Changes
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 A.23	CTS Table 4.3-1, Functional Unit 2 requires a CHANNEL FUNCTIONAL TEST to be performed. CTS Table 4.3-1 Note 3 clarifies that this test is a comparison of incore to excore axial imbalance above 15% RTP and to recalibrate if the absolute difference is ≥ 3%. ITS SR 3.3.1.3 requires a similar test, however, the SR is required to be performed as part of the OPERABILITY of ITS Table 3.3.1-1 Function 6, Overtemperature ΔT, not as part of ITS Table 3.3.1-1 Function 2, Power Range Neutron Flux. This changes the CTS by applying this Surveillance to the Overtemperature ΔT Function in lieu of the Power Range Neutron Flux Function. This change is designated as administrative because it does not result in any technical changes to the CTS.	SR 3.3.1.3 Table 3.3.1-1 Function 6	Table 4.3-1 Functional Unit 2
3.3.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.2	3/4.3.2
3.3.2 A.2	CTS 3.3.2.1 Actions and CTS Table 3.3-3 provide the compensatory actions to take when ESFAS instrumentation is inoperable. ITS 3.3.2 ACTIONS provide the compensatory actions for inoperable ESFAS Instrumentation. The ITS 3.3.2 ACTIONS include a Note that allows separate Condition entry for each Function. In addition, due to the manner in which the titles of Functions 1.e.(2), 4.a, 4.e, 5.b, 6.c, and 6.e are presented, separate Condition entry is allowed within a Function as follows: (a) for Function 1.e.(2) (High Differential Pressure Between Steam Lines (per steam line)), Function 4.a (Steam Line Isolation Manual Initiation (per steam line)), and Function 4.e (High Steam Line Flow in Two Steam Lines (per steam line)) on a steam line basis; (b) for Function 5.b (SG Water Level - High High (per SG)) and Function 6.c (SG Water Level - Low Low (per SG)) on a steam generator basis; and (c) for Function 6.e (Loss of Voltage (per bus)) on a bus basis. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable ESFAS instrumentation Function and for certain Functions on a steam line, steam generator, or bus basis. Furthermore, the word "operating" in CTS Functional Unit 9.d is not included in the ITS. This change is administrative because it does not result in technical changes to the CTS.	3.3.2 ACTIONS Note	3.3.2.1 Actions Table 3.3-3 Actions

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.3	CTS 4.3.2.1.3 requires ENGINEERED SAFETY FEATURES (ESF) RESPONSE TIME testing of "each" ESFAS function. ITS SR 3.3.2.12 is the ESF RESPONSE TIME testing Surveillance, but in ITS Table 3.3.2-1, it is only required for Functions 1.c (Safety Injection Containment Pressure - High), 1.d (Safety Injection Pressurizer Pressure - Low), 1.e.(1) (Safety Injection Steam Line Pressure - Low), 2.c (Containment Spray Containment Pressure - High High), 4.c (Steam Line Isolation Containment Pressure - High High), 4.d (Steam Line Isolation Steam Line Pressure - Low), 5.b (Turbine Trip and Feedwater Isolation SG Water Level - High High), 5.c (Turbine Trip and Feedwater Isolation SI Input from ESFAS), 6.c (Auxiliary Feedwater SG Water Level - Low Low), 6.e (Auxiliary Feedwater Loss of Voltage), 6.f (Auxiliary Feedwater Undervoltage Reactor Coolant Pump), 6.g (Auxiliary Feedwater Trip of All Main Feedwater Pumps), and 7.c (CEQ System Containment Pressure - High). This changes the CTS by specifically stating that the Surveillance is only applicable to certain Functions, not "each" function. This change is administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1 Functions 1.c, 1.d, 1.e.(1), 2.c, 4.c, 4.d, 5.b, 5.c, 6.c, 6.e, 6.f, 6.g, and 7.c requirement to perform SR 3.3.2.12	4.3.2.1.3
3.3.2 A.4	CTS 4.3.2.1.3 states, in part, that the ESF RESPONSE TIME of each trip function shall be demonstrated to be within its limit at least once per 18 months. The requirement specifies that each test shall include at least one logic train such that both logic trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific ESFAS Function as shown in the "TOTAL NO. OF CHANNELS" column of Table 3.3-3. ITS SR 3.3.2.12 requires the verification of ESF RESPONSE TIME every 24 months "on a STAGGERED TEST BASIS." The ITS definition of STAGGERED TEST BASIS is consistent with the CTS testing Frequency. This changes the CTS by utilizing the ITS definition of STAGGERED TEST BASIS. The extension in the Surveillance Frequency from 18 months to 24 months is discussed in DOC L.4. This change is administrative because it does not result in technical changes to the CTS.	SR 3.3.2.12	4.3.2.1.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.5	CTS Table 3.3-3 specifies the "TOTAL NO. OF CHANNELS" and the "MINIMUM CHANNELS OPERABLE" associated with each ESFAS Functional Unit. For CTS Table 3.3-3 Functional Units 1.c, 1.d, 1.e, 1.f, 2.c, 3.b.3), 4.c, 4.d, 4.e, 5.a, 6.a, 6.b, 7.a, 7.b, and 10.c, the number of channels listed in the "TOTAL NO. OF CHANNELS" column is greater than that listed in the "MINIMUM CHANNELS OPERABLE" column. CTS Table 3.3-3 Actions 14, 16, 19, and 20 specify the actions to take with the number of channels OPERABLE one less than required by the "TOTAL NO. OF CHANNELS" column. ITS LCO 3.3.2 requires the ESFAS instrumentation for each Function in Table 3.3.2-1 to be OPERABLE, and ITS Table 3.3.2-1 includes only one column titled "REQUIRED CHANNELS." For the associated ITS Table 3.3.2-1 Functions, the number of channels listed in the "REQUIRED CHANNELS" column is equal to the number of channels listed in CTS "TOTAL NO. OF CHANNELS" column. The ITS 3.3.2 ACTIONS require entry when the OPERABLE channels are one less than required by the "REQUIRED CHANNELS" column. In addition, the description in the CTS Table 3.3-3 "MINIMUM CHANNELS OPERABLE" column includes: a) the phrase “/steam line” for Functional Units 1.e and 4.d, b) the word "loops" for Functional Units 1.f and 4.e; c) the phrase "loop" for Functional Unit 5.a, d) the phrase “/Stm. Gen.” for Functional Unit 6.a, and e) the phrase “/bus” for Functional Unit 6.b. In ITS Table 3.3.2-1, the phrases used are "per steam line" for Functions 1.e.(1) and 4.d. The remaining phrases used are not used in the ITS Table 3.3.2-1 REQUIRED CHANNELS OPERABLE column since similar phrases are used in the titles of the Functions, as discussed in DOC A.2. This changes the CTS by changing the title of the "MINIMUM CHANNELS OPERABLE" column to "REQUIRED CHANNELS" and increases the number of channels listed to match the number listed in the "TOTAL NO. OF CHANNELS" column. It also changes the CTS by modifying some of the descriptions in the "MINIMUM CHANNELS OPERABLE" column. This change is administrative because it does not result in technical changes to the CTS.	Table 3.3.2-1 "REQUIRED CHANNELS" column, 3.3.2 ACTIONS	Table 3.3-3 "TOTAL NO. OF CHANNELS" and "MINIMUM CHANNELS OPERABLE" column, Table 3.3-3 Actions 14, 16, 19, and 20
3.3.2 A.6	Not used.		
3.3.2 A.7	CTS Table 3.3-3 Functional Unit 3.a (Containment Isolation Phase "A" Isolation) does not specifically include the Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 3.a.(2) requires the two Automatic Actuation Logic and Actuation Relay trains to be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.3.2 ACTIONS C and I have been included for this Function, and provide 6 hours to restore an inoperable train if one train is inoperable (ACTION C), and if not restored, provide a shutdown requirement (ACTION J). This changes the CTS by adding Function 3.a.(2) (Containment Isolation Phase A Isolation Automatic Actuation Logic and Actuation Relays) to the Technical Specifications including the LCO, number of channels (2 trains), and appropriate ACTIONS. This change is administrative because it does not result in a technical change to the CTS.	3.3.2 ACTIONS C and J, Table 3.3.2-1 Function 3.a.(2)	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.8	CTS Table 3.3-3 Functional Unit 5, Turbine Trip and Feedwater Isolation, does not explicitly contain the OPERABILITY requirements for the SI Input from ESFAS Function. CTS Table 3.3-3 Functional Unit 1 requires the Safety Injection Function to also provide input to the Turbine Trip and Feedwater Isolation Function, as indicated in the title of CTS Table 3.3-3 Functional Unit 1. ITS Table 3.3.2-1 Function 5.c, SI Input from ESFAS, requires the SI Input from ESFAS Function to be OPERABLE in MODE 1, and MODES 2 and 3 except when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve. It also states to refer to Function 1 for all initiation functions and requirements, including ACTIONS and Surveillances. This changes the CTS by adding the explicit requirement that the SI Input from ESFAS must support the Turbine Trip and Feedwater Isolation. The changes related to the Applicability associated with this Function are discussed in DOC L.15. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.2-1 Function 5.c	Table 3.3-3 Functional Unit 1
3.3.2 A.9	CTS LCO 3.3.2.1 states that the interlocks of Table 3.3-3 shall be OPERABLE. However, CTS Table 3.3-3 provides no specific Applicability requirements for the P-11 and P-12 interlocks. ITS Table 3.3.2-1 specifies MODES 1, 2, and 3 as the Applicability for the P-11 interlock (Function 8.b) and MODES 1, 2, and 3 above the P-12 (T_{avg} - Low Low) interlock for the P-12 interlock (Functions 8.c). This changes the CTS by adding a specific Applicability for the P-11 and P-12 interlocks. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.2-1 Functions 8.b and 8.c	LCO 3.3.2.1, Table 3.3-3 P-11 and P-12 Interlocks
3.3.2 A.10	CTS 4.3.2.1.1 requires that the ESFAS instrumentation channels be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3-2. ITS 3.3.2 requires the performance of either a CHANNEL OPERATIONAL TEST (COT), a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT), or, in the case of the Automatic Actuation Logic, an ACTUATION LOGIC TEST. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to either a COT, a TADOT, or an ACTUATION LOGIC TEST. This change is administrative because it does not result in a technical change to the CTS.	SR 3.3.2.2, SR 3.3.2.3, SR 3.3.2.5, SR 3.3.2.6, SR 3.3.2.9, SR 3.3.2.11	4.3.2.1.1
3.3.2 A.11	CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST be performed for Functional Unit 6.b (4 kV Bus Loss of Voltage) and Functional Unit 7.b (Reactor Coolant Pump Bus Undervoltage). ITS Table 3.3.2-1 Function 6.e (Loss of Voltage) requires performance of SR 3.3.2.2, a TADOT and Function 6.f (Undervoltage Reactor Coolant Pump) requires performance of SR 3.3.2.5, a TADOT. However, each Surveillance is modified by a Note that states that a verification of the relay setpoints is not required. This changes the CTS by explicitly stating that relay setpoint verification is not part of the TADOT. The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.10. This change is administrative because it does not result in a technical change to the CTS.	SR 3.3.2.2 Note and SR 3.3.2.5 Note	Table 4.3-2 CHANNEL FUNCTIONAL TEST requirements for Functional Units 6.b and 7.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.12	CTS Table 3.3-3 Functional Unit 5, Turbine Trip and Feedwater Isolation, does not specifically include the Automatic Actuation Logic and Actuation Relay Function. ITS Table 3.3.2-1 Function 5.a requires the two Automatic Actuation Logic and Actuation Relay trains to be OPERABLE in MODE 1, and MODES 2 and 3 except when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve. This changes the CTS by explicitly requiring the two trains of the Automatic Actuation Logic and Actuation Relays Functions for Turbine Trip and Feedwater Isolation to be OPERABLE in MODE 1, and MODES 2 and 3 except when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.2-1 Function 5.a	N/A
3.3.2 A.13	CTS Table 3.3-3 Functional Unit 6, Motor Driven Auxiliary Feedwater Pumps, and Functional Unit 7, Turbine Driven Auxiliary Feedwater Pumps, do not include the Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 6.a includes the requirements for the Automatic Actuation Logic and Actuation Relays (Solid State Protection System) and Function 6.b includes the requirements for the Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS). The Applicability of these Functions is MODES 1, 2, and 3 and two trains of each Function are required to be OPERABLE. This changes the CTS by explicitly requiring the two trains of the Automatic Actuation Logic and Actuation Relays Functions (Solid State Protection System and Balance of Plant ESFAS) for the Auxiliary Feedwater System to be OPERABLE in MODES 1, 2, and 3. This change is administrative because it does not result in a technical change to the CTS.	Table 3.3.2-1 Functions 6.a and 6.b	N/A
3.3.2 A.14	CTS Table 3.3-1 Action 18 requires the unit to be in MODE 3 within 6 hours and MODE 5 within the following 30 hours if a Functional Unit 6.d, Loss of Main Feedwater Pumps, channel is inoperable and not restored within 48 hours. However, CTS Table 3.3-3 Functional Unit 6.d is applicable only in MODES 1 and 2. Thus, as described in CTS 3.0.1, CTS Table 3.3-3 Action 18 is only applicable in MODES 1 and 2 for Functional Unit 6.d. ITS 3.3.2 ACTION H is the associated shutdown action for the above Function (ITS Table 3.3.2-1 Function 6.g), and it only requires the unit to be in MODE 3 within 6 hours. This changes the CTS by explicitly specifying that the unit is only required to be shut down to MODE 3. This change is administrative because it does not result in a technical change to the CTS.	3.3.2 ACTION H	Table 3.3-3 Action 18

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 A.15	CTS Table 3.3-3 Functional Unit 1.e specifies the requirements for the Differential Pressure Between Steam Lines - High Function for four loop operation and three (n-1) loop operation (in MODE 3 above P-12). CTS Table 3.3-3 Functional Units 1.f and 4.e specify the requirements for the Steam Line Pressure - Low Function for four loop operation and three (n-1) loop operation (in MODE 3 above P-12). CTS Table 3.3-3 Functional Unit 4.d specifies the requirements for the Steam Flow in Two Steam Lines - High Function coincident with Tavg - Low Low for four loop operation and three (n-1) loop operation (in MODE 3 above P-12). Each of these CTS Table 3.3-3 Functional Units "CHANNELS TO TRIP" column is modified by CTS Table 3.3-3 Note ### or ####, as applicable. These Notes require certain channels to be tripped during three (n-1) loop operation. In addition, CTS Table 3.3-3 Action 15 is provided for these three (n-1) loop operation instrumentation requirements. ITS Table 3.3.2-1 Functions 1.e.(2) (Steam Line Pressure - High Differential Pressure Between Steam Lines), 1.e.(1) and 4.d (Steam Line Pressure - Low), and 4.e (High Steam Flow in Two Steam Lines coincident with Tavg - Low Low) specify requirements for these Functions based only upon the four loop operation requirements from the CTS. This changes the CTS by eliminating the ESFAS instrumentation requirements that are only associated with three (n-1) loop operation. This change is administrative since this change eliminates requirements that are not applicable to CNP, the changes are consistent with the NUREG-1431 STS requirements and they do not change the licensing basis of CNP.	Table 3.3.2-1 Functions 1.e.(1), 1.e.(2), 4.d, and 4.e	Table 3.3-3 Functional Units 1.e, 1.f, 4.d, and 4.e, Including Notes ### and ####, Table 3.3-3 Action 15
3.3.2 A.16	CTS Table 3.3-3, Functional Unit 6.d (Loss of Main Feedwater Pumps) requires 2 channels to be OPERABLE. Unit 1 ITS Table 3.3.2-1 Function 6.g requires 2 channels per pump to be OPERABLE and Unit 2 ITS Table 3.3.2-1 Function 6.g requires 1 channel per pump to be OPERABLE. This changes the CTS by stating the number of channels required OPERABLE in ITS terminology. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.2.1 Function 6.g channels required OPERABLE	Table 3.3-3 Functional Unit 6.d required channels OPERABLE
3.3.2 A.17	CTS Tables 3.3-3, 3.3-4, and 4.3-2 provide specific requirements, including Applicability, number of channels, ACTIONS, and Surveillances, for Functional Units 3.a.2), 6.c, and 9.a, which are the Functional Units for the Safety Injection (SI) signals generated from ESFAS to the Containment Isolation and Motor Driven Auxiliary Feedwater Pumps. ITS Table 3.3.2-1 Functions 3.a.(3) and 6.d, which are the same Functions, also provides the specific requirements for the SI Input from ESFAS. However, the ITS only specifies the Applicabilities for these two Functions; it refers to the requirements of ITS Table 3.3.2-1 Function 1 for the remainder of the requirements. This changes the CTS by providing a cross-reference to the requirements of the various SI Functions in lieu of listing them all for the Containment Isolation and Auxiliary Feedwater Pumps. This change is designated as an administrative change because it does not result in a technical change to the CTS.	Table 3.3.2-1 Functions 3.2.(3) and 6.d Applicability	Tables 3.3-3, 3.3-4, and 4.3-2 Applicability

Table A - Administrative Changes
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.3	3/4.3.3.6 (Unit 2), 3/4.3.3.8 (Unit 1), 3/4.3.3.1, 3/4.6.4.1
3.3.3 A.2	Unit 1 CTS 3.3.3.8 Actions a and b, Unit 2 CTS 3.3.3.6 Actions a and b, CTS 3.3.3.1 Actions b and c, CTS Table 3.3-6 Action 22A, and CTS 3.6.4.1 Actions a and b provide the compensatory actions to take when PAM instrumentation is inoperable. ITS 3.3.3 ACTIONS provide the compensatory actions for inoperable PAM Instrumentation. The ITS 3.3.3 ACTIONS include a Note (Note 2) that allows separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function on a steam generator basis for Functions 2 (Steam Generator Pressure (per SG)) and 19 (Secondary Heat Sink Indication (per SG)), since the titles of the Functions include the term “(per SG).” This modifies the CTS by providing a specific allowance to enter the Action for each inoperable PAM instrumentation Function and for certain Functions on a steam generator basis. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.3 ACTIONS Note 2	3.3.3.6 Actions a and b (Unit 2), 3.3.3.8 Actions a and b (Unit 1), 3.3.3.1 Actions b and c, Table 3.3-6 Action 22A, 3.6.4.1 Actions a and b
3.3.3 A.3	Unit 1 CTS Tables 3.3-11 and 4.3-7 and Unit 2 CTS Tables 3.3-10 and 4.3-10, Instrument 7, Steam Generator Water Level - Narrow Range, requires on channel per steam generator to be OPERABLE and Instrument 10, Auxiliary Feedwater Flow Rate, requires one channel per steam generator to be OPERABLE. ITS Table 3.3.3-1, Function 19, Secondary Heat Sink Indication (per SG), requires two channels per steam generator to be OPERABLE. In addition, footnote (d) states that any combination of two instruments per SG, including Steam Generator Water Level (Narrow Range) and Auxiliary Feedwater Flow, can be used to satisfy Function 19 OPERABILITY requirements. This changes the CTS by combining two Functions into a single Function. This change is designated as administrative because it does not result in technical changes to the CTS.	Table 3.3.3-1 Function 19 required channels	Tables 3.3-11 and 4.3-7 Instrument 7 (Unit 1), Table 3.3-10 and 4.3-10 Instrument 7 (Unit 2)
3.3.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.4	3/4.3.3.5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.4 A.2	CTS 3.3.3.5 Action a provides the compensatory actions to take when remote shutdown monitoring instrumentation is inoperable. ITS 3.3.4 ACTIONS provide the compensatory actions for inoperable remote shutdown monitoring instrumentation. The ITS 3.3.4 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable remote shutdown monitoring instrumentation Function. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.4 ACTIONS Note	3.3.3.5 Action a
3.3.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.5	LCO 3.3.2.1, 3.3.2.1 Actions a and b, 4.3.2.1.1, 4.3.2.1.3, Table 3.3-2 Functional Units 8.a and 8.b, Table 3.3-2 Action 14, Tables 3.3-4 and 4.3-2 Functional Units 8.a and 8.b
3.3.5 A.2	CTS 3.3.2.1, "Engineered Safety Feature Actuation System Instrumentation," requires the Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 to be OPERABLE. ITS 3.3.5, "Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation," requires specific channels per bus for the Loss of Voltage and specific channels per train for the Degraded Voltage Functions to be OPERABLE. This changes the CTS by having a separate Specification for the LOP DG Start Instrumentation in lieu of including it with the ESFAS Instrumentation Specification These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.5	3.3.2.1
3.3.5 A.3	CTS 3.3.2.1 Actions provide the compensatory actions to take when Loss of Power instrumentation is inoperable. ITS 3.3.5 ACTIONS provide the compensatory actions for inoperable LOP DG start instrumentation. The ITS 3.3.5 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable LOP DG Start Instrumentation Function. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.5 ACTIONS Note	3.3.2.1 Actions a and b
3.3.5 A.4	CTS 4.3.2.1.1 and CTS Table 4.3-2 require that Loss of Power Function channels be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST once per 31 days. ITS SR 3.3.5.2 requires the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) once per 31 days. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to a TADOT. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.3.5.2	4.3.2.1.1, Table 4.3-2 CHANNEL FUNCTIONAL TEST requirement for Functional Units 8.a and 8.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 A.5	CTS 4.3.2.1.3 requires ENGINEERED SAFETY FEATURES RESPONSE TIME testing of "each" ESFAS function. ITS 3.3.5 does not include response time testing for the LOP DG Start Instrumentation Functions. This changes the CTS by clearly identifying that the ENGINEERED SAFETY FEATURES RESPONSE TIME testing does not apply to the LOP DG Start Instrumentation Functions. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.3.2.1.3
3.3.5 A.6	CTS Table 3.3-3 specifies the "TOTAL NO. OF CHANNELS" as 3/Bus and the "MINIMUM CHANNELS OPERABLE" as 2/Bus for the Loss of Voltage and Degraded Voltage Functions. CTS Table 3.3-3 Action 14 specifies the actions to take with the number of Loss of Voltage or Degraded Voltage channels OPERABLE one less than required by the "TOTAL NO. OF CHANNELS" column. ITS LCO 3.3.5 requires the LOP DG Start Instrumentation Functions to be OPERABLE and specifies the required number of channels. The required number of channels specified in ITS LCO 3.3.5 is consistent with the TOTAL NO. OF CHANNELS specified in CTS Table 3.3-3. The ITS 3.3.5 ACTIONS require entry when the OPERABLE channels are less than required by the LCO. This changes the CTS by effectively changing the "MINIMUM CHANNELS OPERABLE" column to the required number of channels in the LCO and changes the number of channels to reflect when actions must be taken when a required channel becomes inoperable. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.3.5	Table 3.3-3 "TOTAL NO. OF CHANNELS" and "MINIMUM CHANNELS OPERABLE" columns for Functional Units 8.a and 8.b
3.3.5 A.7	CTS Table 3.3-3 requires 3 channels/bus (T11D – Train A and T11A – Train B (Unit 1) and T21D – Train A and T21A – Train B (Unit 2)) to be OPERABLE for the Degraded Voltage Function (Functional Unit 8.b). ITS LCO 3.3.5, for the Degraded Voltage Function, requires 3 channels per train to be OPERABLE. This changes the CTS by specifying, for the Degraded Voltage Function, the required number of channels on a "per train" basis instead of on a "per bus" basis. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.3.5	Table 3.3-3 "MINIMUM CHANNELS OPERABLE" column for Functional Unit 8.b
3.3.5 A.8	CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST be performed for Functions 8.a (Loss of Power, 4 kV Bus Loss of Voltage) and 8.b (Loss of Power, 4 kV Bus Degraded Voltage). ITS 3.3.5 requires performance of SR 3.3.5.2, a TADOT, for these Functions. However, the Surveillances are modified by a Note that states that a verification of the relay setpoints is not required. This changes the CTS by explicitly stating that setpoint verification is not part of the TADOT. The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.4. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.3.5.2 Note	Table 4.3-2 CHANNEL FUNCTIONAL TEST requirements for Functional Units 8.a and 8.b

Table A - Administrative Changes
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.6	LCO 3.3.2.1, 3.3.2.1 Actions a and b, 4.3.2.1.1, 4.3.2.1.3, Tables 3.3-3 and 3.3-4 Functional Units 3.c.1), 3.c.2), 3.c.3), 9.a, 9.b, and 9.c, Table 3.3-3 Actions 17 and 18, Table 4.3-2 Functional Units 3.c.1), 3.c.2), 9.a, 9.b, and 9.c, 3/4.3.3.1, Table 3.3-6 Functional Units 1.A.i, 1.B.i, 1.B.ii, 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii (including footnote *), Table 3.3-6 Action 22, Table 4.3-3 Functional Units 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii (including footnote *), 3/4.9.9
3.3.6 A.2	CTS 3.3.2.1, "Engineered Safety Feature Actuation System Instrumentation," requires the Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 to be OPERABLE. CTS 3.3.3.1, "Radiation Monitoring Instrumentation," requires the radiation monitoring instrumentation channels shown in Table 3.3-6 to be OPERABLE. CTS 3.9.9 requires the Containment Purge and Exhaust Isolation System to be OPERABLE. ITS 3.3.6, "Containment Purge Supply and Exhaust System Isolation Instrumentation," requires specific channels for the Manual Initiation, Automatic Actuation Logic and Actuation Relays, Containment Radiation, and Safety Injection Functions to be OPERABLE. This changes the CTS by having a separate Specification for the Containment Purge Supply and Exhaust System isolation instrumentation in lieu of including it with the ESFAS Instrumentation Specification. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.6	3.3.2.1, 3.3.3.1, 3.3.9

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A.3	CTS 3.3.2.1 Actions and CTS 3.3.3.1 Actions provide the compensatory actions to take when Containment Purge Supply and Exhaust System isolation instrumentation is inoperable. ITS 3.3.6 ACTIONS provide the compensatory actions for inoperable Containment Purge Supply and Exhaust System isolation instrumentation. The ITS 3.3.6 ACTIONS include a Note (Note 1) that allows separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function on a train basis for Function 3 (Containment Radiation (per train)) since the title of the Function includes the term “(per train).” This modifies the CTS by providing a specific allowance to enter the Action for each inoperable Containment Purge Supply and Exhaust System Isolation Instrumentation Function. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.6 ACTIONS Note I	3.3.2.1 Actions a and b, 3.3.3.1 Actions a and b
3.3.6 A.4	CTS 4.3.2.1.1, Table 4.3-2, 4.3.3.1, and Table 4.3-3 require that Containment Radiation Function channels be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST. ITS SR 3.3.6.4 requires the performance of a CHANNEL OPERATIONAL TEST (COT) of the Containment Radiation Function channels. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to a COT. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.3.6.4	CTS 4.3.2.1.1, Table 4.3-2, 4.3.3.1, and Table 4.3-3 CHANNEL FUNCTIONAL TEST requirements for the Containment Radiation Functional Units/Instruments
3.3.6 A.5	CTS 4.3.2.1.3 requires ENGINEERED SAFETY FEATURES RESPONSE TIME testing of "each" ESFAS function. ITS 3.3.6 does not include response time testing for the Containment Purge Supply and Exhaust System Isolation Instrumentation Functions. This changes the CTS by clearly identifying that the ENGINEERED SAFETY FEATURES RESPONSE TIME testing does not apply to the Containment Purge Supply and Exhaust System Isolation Instrumentation Functions. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.3.2.1.3
3.3.6 A.6	Not used.		
3.3.6 A.7	CTS 3.3.2.1 Action a requires action to be taken if the channel's trip setpoint is less conservative than the value shown in the Allowable Value column of Table 3.3-4. However, no Allowable Value is provided for Functional Units 3.c.2 and 3.c.3 (the Containment Radioactivity - High monitors); only a Trip Setpoint is provided. CTS 3.3.3.1 requires the radiation monitoring instrumentation channels shown in Table 3.3-6 to be OPERABLE with their alarm/trip setpoints within specified limits. CTS 3.3.3.1 Action a requires the channel to be declared inoperable when the setpoint exceeds the Trip Setpoint value shown in CTS Table 3.3-6 and not restored to within limit within 4 hours. ITS Table 3.3.6-1 specifies this value as an "Allowable Value" consistent with other STS Section 3.3 Tables. This changes the CTS by specifying an “Allowable Value” in ITS Table 3.3.6-1 instead of a "Trip Setpoint." These changes are administrative changes because they do not result in technical changes to the CTS.	Table 3.3.6-1	Table 3.3-4 ALLOWABLE VALUE column, Table 3.3-6 TRIP SETPOINT column

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 A.8	CTS 3.3.3.1 Action c applies, in part, to the MODE 6 requirements for CTS Table 3.3-6 Functional Units 2.A (Train A Containment Area Radiation, Particulate, and Noble Gas Channels) and 2.B (Train B Containment Area Radiation, Particulate, and Noble Gas Channels), and states that the provisions of Specifications 3.0.3 are not applicable. The CTS 3.9.9 Action, which applies when the above channels are inoperable, also states that the provisions of Specification 3.0.3 are not applicable. ITS 3.3.6 does not contain equivalent statements. This changes the CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.3.3.1 Action c, 3.3.9 Action
3.3.6 A.9	CTS Table 4.3-2 requires a TADOT be performed on Functional Units 9.b and 9.c. CTS 1.40 states that a TADOT includes verification that the trip actuating devices actuate at the required setpoint. For these Functional Units, the CTS does not specify a setpoint since they are Manual Initiation Functions. ITS SR 3.3.6.5, the TADOT for these Functions, includes a Note that states verification of setpoint is not required. This changes the CTS by adding a clarifying Note to the TADOT Surveillance. This change is designated as administrative because it does not result in a technical change to the CTS.	SR 3.3.6.5 Note	Table 4.3-2 Functional Unit 9.b and 9.c, 1.40
3.3.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.7	LCO 3.7.5.1, 3.7.5.1 Action a, 4.7.5.1.e.2
3.3.7 A.2	CTS 4.7.5.1.e.2 requires the verification that on a Safety Injection Signal from other unit, the CREV System automatically operates. ITS Table 3.3.7-1 provides the requirements for Functions 1 and 3, the Automatic Actuation Logic and Actuation Relays for both units, and for Functions 2 and 4, the SI Signal from ESFAS for both units. In addition, SRs 3.3.7.1, 3.3.7.2, and 3.3.7.3 require the performance of an ACTUATION LOGIC TEST, a MASTER RELAY TEST, and a SLAVE RELAY TEST. This change the CTS by explicitly stating the specific Functions that provide the actuation signal for the CREV System, and stating the actual instrumentation Surveillance that verify OPERABILITY of the Functions. This change is designated as administrative since it does not result in a technical change.	SR 3.3.7.1, SR 3.3.7.2, SR 3.3.7.3, Table 3.3.7-1 Functions 1, 2, 3, and 4	4.7.5.1.e.2
3.3.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS) These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.8	LCO 3.3.1.1, 3.3.1.1 Action, 4.3.1.1.1, 4.3.1.1.3, Table 3.3-1 Functional Unit 6, Table 3.3-1 Action 5, Table 4.3-1 Functional Unit 6 (including note (6))

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.8 A.2	CTS 3.3.1, "Reactor Trip System Instrumentation," requires the Reactor Trip System instrumentation channels and interlocks shown in Table 3.3-1 to be OPERABLE. ITS 3.3.8, "Boron Dilution Monitoring Instrumentation (BDMI)," requires one source range neutron flux monitoring channel to be OPERABLE. This changes the CTS by having a separate Specification for the Boron Dilution Monitoring Instrumentation, in lieu of including it with the Reactor Trip System Instrumentation Specification. These changes are administrative changes because they do not result in technical changes to the CTS.	3.3.8	3.3.1
3.3.8 A.3	CTS 4.3.1.1.1 and Table 4.3-1 require that the source range neutron flux monitoring channel be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST once per 31 days and each unit startup, if not performed in the previous 7 days. ITS 3.3.8 does not include this Surveillance Requirement. This changes the CTS by deleting the CHANNEL FUNCTIONAL TEST requirement for the source range neutron flux monitoring channel of the Boron Dilution Monitoring Instrumentation. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.3.1.1.1, Table 4.3-1 CHANNEL FUNCTIONAL TEST requirement for Functional Unit 6
3.3.8 A.4	CTS 4.3.1.1.3 and the * footnote require REACTOR TRIP SYSTEM RESPONSE TIME testing of "each" reactor trip function. ITS 3.3.8 does not include response time testing for the source range neutron flux monitoring channel of the Boron Dilution Monitoring Instrumentation. This changes the CTS by clearly identifying that the REACTOR TRIP SYSTEM RESPONSE TIME testing does not apply to the source range neutron flux monitoring channel of the Boron Dilution Monitoring Instrumentation. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.3.1.1.3 (including footnote *)
3.3.8 A.5	CTS Table 3.3-1 Action 5.a provides the allowance to continue to add water from the Refueling Water Storage Tank (RWST) provided the RWST boron concentration is greater than the minimum required by the other Technical Specifications. CTS Table 3.3-1 Action 5.c provides the allowance to not isolate the RWST in MODE 5 provided RWST boron concentration is greater than or equal to Reactor Coolant System (RCS) boron concentration or greater than equal to the minimum required by another Technical Specification. Note 2 to ITS 3.3.8 Required Action B.1 and the Note to ITS 3.3.8 Required Action B.1 and the Note to ITS 3.3.8 Required Action B.3.1 provide these same allowances, but require that RWST boron concentration be ≥ 2400 ppm. This changes the CTS by stating the applicable limit from the other Technical Specifications in this Technical Specification. This change is designated as administrative because it does not result in a technical changes to the CTS.	3.3.8 Required Action B.1 and 3.3.8 Required Action B.3.1	Table 3.3-1 Action 5.a and 5.c

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.1	3/4.2.5
3.4.1 A.2	CTS 3.2.5 Action requires the unit to reduce THERMAL POWER to "less than" 5 % of RATED THERMAL POWER (RTP) within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to "less than or equal to" 5% RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by allowing the unit be at 5% RTP instead of < 5% RTP. The change in the time period to reach 5% RTP is discussed in DOC L.1. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.1 ACTION B	3.2.5 Action
3.4.1 A.3	CTS 3.2.5 Table 3.2-1 (Unit 1 only) contains a column for DNB limits during four loop operation at RATED THERMAL POWER. The ITS does not contain this detail. This changes the CTS by eliminating the detail that the DNB limits apply to four loop operation at RATED THERMAL POWER. This change is administrative because the requirements have not changed. Both the ITS and the CTS require all four loops in operation in the applicable MODE (MODE 1). This change is administrative because it eliminates an option in the CTS which cannot be used.	N/A	Table 3.2-1 (Unit 1 only)
3.4.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.2	3/4.1.1.5
3.4.2 A.2	CTS 3.1.1.5 Action states that with a Reactor Coolant System operating loop temperature (T_{avg}) < 541°F, to "restore (T_{avg}) to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes." ITS 3.4.2, ACTION A, states that with T_{avg} in one or more RCS loops not within limit, be in MODE 2 with k_{eff} < 1.0 within 30 minutes. This changes the CTS by eliminating the redundant and unnecessary requirement to restore T_{avg} to within its limit within 15 minutes. The change associated with entering MODE 2 with k_{eff} < 1.0 instead of HOT STANDBY is discussed in DOC A.3. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.1.1.5 Action
3.4.2 A.3	CTS 3.1.1.5 Action states that with a Reactor Coolant System operating loop temperature (T_{avg}) < 541°F, to restore T_{avg} to within its limit within 15 minutes or "be in HOT STANDBY within the next 15 minutes." ITS 3.4.2, ACTION A, states that with T_{avg} in one or more RCS loops not within limit, be in MODE 2 with k_{eff} < 1.0 within 30 minutes. This changes the CTS requirement to enter HOT STANDBY to enter MODE 2 with k_{eff} < 1.0. Other changes to this CTS Action are discussed in DOC A.2. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.2 ACTION A	3.1.1.5 Action

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.2 A.4	The Applicability of CTS 3.1.1.5 (Unit 1 only) is modified by Footnote *, which states "See Special Test Exception 3.10.3." The ITS 3.4.2 Applicability does not contain the footnote or a reference to the Special Test Exception. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.1.1.5 Applicability footnote * (Unit 1 only)
3.4.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.3	3/4.9.1
3.4.3 A.2	CTS 3.4.9.1 states that the RCS temperature and pressure shall be limited "during heatup, cooldown, criticality, and inservice leak and hydrostatic testing." CTS 3.4.9.1 is applicable at all times. ITS 3.4.3 states that the RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained. ITS 3.4.3 is applicable at all times. This changes the CTS by eliminating the LCO requirement that the limits must be met during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. This change is administrative because the CTS and ITS limits are applicable at all times, including during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. Stating that the limits are applicable during heatup, cooldown, and inservice leak and hydrostatic testing in the LCO presents an apparent conflict with the Applicability which states that the limits apply at all times. This change is administrative as it is an editorial change to eliminate an apparent conflict in the CTS.	3.4.3	3.4.9.1
3.4.3 A.3	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an analysis to determine the effects of the out-of limit condition on the fracture toughness properties of the RCS; and determine that the RCS remains acceptable for continued operations. ITS 3.4.3, Conditions A and C state that when the requirements of the LCO are not met, the parameters must be restored to within limits and it must be determined that the RCS is acceptable for continued operation. ITS 3.4.3, Conditions A and C are modified by a Note which requires the determination that the RCS is acceptable for continued operation to be performed whenever the Condition is entered. This changes the CTS by explicitly stating that a determination that the RCS is acceptable for continued operation must be performed whenever the condition is entered. Other changes to the Actions are described in other DOCs. This change is administrative because it is the current understanding and application of the CTS Action. The CTS 3.4.9.1 Action is currently interpreted as requiring a determination that the RCS is acceptable for continued operation whenever the LCO is not met. This change is editorial as it clarifies the current understanding of the CTS requirement.	3.4.3 Conditions A and C Note	3.4.9.1 Action

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 A.4	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes; perform an analysis to determine the effects of the out-of-limit condition on the fracture toughness properties of the RCS; determine that the RCS remains acceptable for continued operations or be in at least hot standby within the next 6 hours and reduce the RCS T_{avg} and pressure to less than 200°F and 500 psig, respectively, within the following 30 hours. ITS 3.4.3, Condition C, states that with the requirements of the LCO not met any time in other than MODE 1, 2, 3, or 4, to initiate immediate action to restore the parameter(s) to within limits and determine the RCS is acceptable for continued operation prior to entering MODE 4. This change is administrative because this change reflects an enhanced presentation of the existing intent. The CTS 3.4.9.1 Action to "restore…within 30 minutes" is proposed to be revised to "initiate action to restore …Immediately" for conditions other than MODES 1, 2, 3, and 4. The existing Action would appear to provide a half hour in which pressure and temperature requirements could exceed the limits, even if capable of being returned to within limits. Also, if the parameters are incapable of being restored to within the limits within 30 minutes, the existing Action would appear to result in the requirement of a Licensee Event Report. The intent of the Action is believed to be more appropriately presented in ITS 3.4.3 Required Action C.1. This interpretation of the intent is supported by the Westinghouse Standard Technical Specifications, NUREG-1431, Rev. 2. This change is administrative as it reflects an enhanced presentation of the existing intent.	3.4.3 ACTION C	3.4.9.1 Action
3.4.3 A.5	The Applicability of CTS 3.4.9.1 is modified by Footnote *, which states "See Special Test Exception 3.10.3." The ITS 3.4.3 Applicability does not contain the footnote or a reference to the Special Test Exception. This changes the Unit 1 CTS by deleting a cross-reference to the Special Test Exception. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	N/A	3.4.9.1 Applicability (Unit 1 only)
3.4.3 A.6	CTS 4.4.9.1.c (Unit 1) and CTS 4.4.9.1.2 (Unit 2) state that the reactor vessel material irradiation surveillance specimens shall be removed and examined to determine changes in material properties at the intervals shown in Table 4.4-5. The results of these examinations shall be used to update the P/T limit curves. ITS 3.4.3 does not contain this Surveillance nor the Table. This changes the CTS by deleting the reactor vessel material irradiation Surveillance Requirement. This change is administrative because the Surveillance is unnecessary and repetitive. The unit is required by applicable regulations to remove material irradiation surveillance specimens and generate P/T curves in accordance with 10 CFR 50, Appendix H. Therefore, the Surveillance serves no purpose and is removed. This change is administrative as it eliminates a requirement that is duplicative of a regulatory requirement in the CFR.	N/A	4.4.9.1.c (Unit 1), 4.4.9.1.2 (Unit 2)
3.4.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.4	3/4.4.1.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.4 A.2	CTS 3.4.1.1 states that all reactor coolant loops shall be in operation. ITS 3.4.4 states that four RCS loops shall be OPERABLE and in operation. This changes the CTS by requiring the RCS loops to be OPERABLE. This change is administrative because it is consistent with the current use and understanding of the LCO. It is not sufficient for a RCS loop to be in operation if it is not capable of performing its safety function (i.e., OPERABLE). This change is administrative as it clarifies the current understanding of a requirement.	LCO 3.4.4	3.4.1.1
3.4.4 A.3	The Applicability of CTS 3.4.1.1 (Unit 1) is modified by footnote * that states "See Special Test Exception 3.10.5." The Applicability of CTS 3.4.1.1 (Unit 2) is modified by footnote * that states "See Special Test Exception 3.10.4." The ITS 3.4.4 Applicability does not contain the footnotes or a reference to the Special Test Exceptions. The purpose of the footnote references is to alert the user that a Special Test Exception exists that may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	N/A	3.4.1.1 Applicability footnote *
3.4.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.5	3/4.4.1.2
3.4.5 A.2	CTS 3.4.1.2 Footnote * allows all reactor coolant pumps to be de-energized. ITS LCO 3.4.5 Note allows all reactor coolant pumps to be removed from operation. This changes the word "de-energized" to "removed from operation." In addition, CTS 3.4.1.2 Footnote * only modifies the LCO portion dealing with the requirements when the Control Rod Drive System is not capable of rod withdrawal; the allowance is not applicable when the Control Rod Drive System is capable of rod withdrawal. In the ITS LCO 3.4.5 Note, this is specifically stated as part c of the Note. This changes the CTS by clearly stating when the allowance can be used, with respect to the condition of the Rod Control System. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.5 Note	3.4.1.2 footnote *
3.4.5 A.3	CTS 3.4.1.2 Action b requires the restoration of the required number of coolant loops within 2 hours or to open the reactor trip breakers. ITS 3.4.5 Required Actions C.1 and D.1 require the Rod Control System to be placed in a condition incapable of rod withdrawal. This changes the CTS by not explicitly stating the requirement to restore the RCS loop to an operating condition. The change from open the reactor trip breakers to place the Rod Control System in a condition incapable of rod withdrawal is covered by DOC LA.2. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.4.1.2 Action b

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.6	3/4.4.1.3
3.4.6 A.2	CTS 3.4.1.3 Footnote * states that the OPERABILITY of a reactor coolant loop does not require an OPERABLE Auxiliary Feedwater System. ITS LCO 3.4.6 does not include this detail. This changes the CTS by deleting the detail that OPERABILITY of the reactor coolant loops do not require an OPERABLE auxiliary feedwater system. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.4.1.3 footnote *
3.4.6 A.3	CTS 3.4.1.3 Footnote ** allows all reactor coolant pumps to be de-energized. ITS LCO 3.4.6 Note 1 allows all reactor coolant pumps and RHR pumps to be removed from operation. This changes the word "de-energized" to "removed from operation." These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.6 Note 1	3.4.1.3 footnote **
3.4.6 A.4	CTS 4.4.1.3.1 states that the required residual heat removal loop(s) shall be determined OPERABLE per Specification 4.0.5, the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components. ITS 3.4.6 does not contain this explicit Surveillance Requirement. This changes the CTS by deleting the explicit requirement to perform the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 component. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.4.1.3.1
3.4.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.7	3/4.4.1.4
3.4.7 A.2	CTS 3.4.1.4 states that residual heat removal (RHR) loops shall be OPERABLE. Footnote † to the LCO states that the OPERABLE RHR loops may have inoperable offsite or emergency power sources. ITS 3.4.7 does not contain a specific allowance for an OPERABLE RHR loop to have an offsite or emergency power source inoperable. This change is administrative because the ITS definition of OPERABLE - OPERABILITY requires an OPERABLE component to have only a normal or an emergency power source. This change to the CTS definition of OPERABLE - OPERABILITY is discussed in the ITS Section 1.0 Discussion of Changes. Given this change to the definition of OPERABLE - OPERABILITY, a specific allowance for the RHR loops is not required. This change is administrative as it replaces a specific exception with an ITS change in the definition of OPERABLE - OPERABILITY.	N/A	3.4.1.4 (including footnote †)

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.8	3/4.4.1.5
3.4.8 A.2	CTS 3.4.1.5 states that at least two RHR loops shall be OPERABLE. Footnote † to the LCO states that the OPERABLE RHR loops may have inoperable offsite or emergency power sources. ITS 3.4.8 does not contain a specific allowance for an OPERABLE RHR loop to have an offsite or emergency power source inoperable. This change is administrative because the ITS definition of OPERABLE - OPERABILITY requires an OPERABLE component to have only a normal or emergency power source. This change to the CTS definition of OPERABLE - OPERABILITY is discussed in the ITS Section 1.0 Discussion of Change. Given this change to the definition of OPERABLE - OPERABILITY, a specific allowance for the RHR loops is not required. This change is administrative as it replaces a specific exception with an ITS change in the definition of OPERABLE - OPERABILITY.	N/A	3.4.1.5 (including footnote †)
3.4.9 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.9	3/4.4.4
3.4.9 A.2	CTS LCO 3.4.4 requires the pressurizer water volume to be ≤ 92% of span and CTS 4.4.4.1 requires a verification of the pressurizer water volume. ITS LCO 3.4.9 requires the pressurizer water level to be ≤ 92% and ITS SR 3.4.9.1 requires verification of the pressurizer water level. This changes the CTS by changing "pressurizer water volume" to "pressurizer water level." These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.9, SR 3.4.9.1	LCO 3.4.4, 4.4.4.1
3.4.9 A.3	CTS LCO 3.4.4 requires two trains of pressurizer heaters with the capacity of each train to be ≥ 150 kW and CTS 4.4.4.2 requires a verification of the pressurizer heaters. ITS LCO 3.4.9 requires two trains of pressurizer backup heaters with the capacity of each train to be greater than or equal to 150 kW and ITS SR 3.4.9.2 requires a verification of the pressurizer backup heaters. This changes the CTS by changing the words "pressurizer heaters" to "pressurizer backup heaters." These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.9, SR 3.4.9.2	LCO 3.4.4, 4.4.4.2
3.4.9 A.4	CTS 3.4.4 Action b applies when the pressurizer is otherwise inoperable (i.e., for reasons other than an inoperable train of pressurizer heaters as described in Action a). ITS 3.4.9 Condition A applies when the pressurizer water level is not within limit. This changes the CTS to specifically state the reason the pressurizer is inoperable. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.9 Condition A	3.4.4 Action b

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.10	3/4.4.2, 3/4.4.3
3.4.10 A.2	CTS 4.4.3 states that there are no Surveillance Requirements on the pressurizer safety valves other than those required by Specification 4.0.5. CTS 4.4.2 states that the pressurizer safety valves shall be demonstrated OPERABLE per CTS 4.4.3. Specification 4.0.5 describes the Inservice Test requirements. CTS LCO 3.4.2 Footnote # and CTS LCO 3.4.3 Footnote # state that the valves shall be reset to the nominal value ± 1% when found outside the ± 1% band. ITS SR 3.4.10.1 states that it must be verified that each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program and, following testing, lift settings shall be within ± 1%. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.4.10.1	LCO 3.4.2 footnote #, LCO 3.4.3 footnote #, 4.4.2, 4.4.3
3.4.11 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.11	3/4.4.11
3.4.11 A.2	CTS 3.4.11 Action a applies to one or more PORVs inoperable solely due to excessive seat leakage. CTS 3.4.11 Actions b, c, and d apply to one, two, or three PORVs inoperable, respectively, due to causes other than excessive seat leakage. CTS 3.4.11 Action g applies to PORVs and block valves not in the same line inoperable due to causes other than excessive seat leakage. ITS 3.4.11 ACTIONS divide the conditions of PORV inoperability into those in which the PORV is capable of being manually cycled and those which the PORV is not capable of being manually cycled. ITS 3.4.11 ACTION A applies to one or more PORVs inoperable and capable of being manually cycled. ITS 3.4.11 ACTION B applies to one or more PORVs inoperable and not capable of being manually cycled. ITS 3.4.11 ACTION D applies to two PORVs inoperable and not capable of being manually cycled. ITS ACTION F applies to one PORV inoperable and not capable of being manually cycled and one block valve inoperable in a different line than the inoperable PORV. ITS ACTION H applies to three PORVs inoperable and not capable of being manually cycled. ITS ACTION H also applies to: a) two PORVs inoperable and not capable of being manually cycled and one block valve inoperable in a different line than the inoperable PORVs; or b) one PORV inoperable and not capable of being manually cycled and two block valves inoperable and in different lines than the inoperable PORV. This changes the CTS by dividing the existing conditions into those in which the PORV can, and cannot, be manually cycled. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.11 ACTIONS A, B, D, F, and H	3.4.11 Actions a, b, c, d, and g

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.11 A.3	CTS 3.4.11 Actions a, b, c, and d provide an option to restore inoperable PORV(s) to OPERABLE status. CTS 3.4.11 Actions e and f provide an option to restore inoperable block valve(s) to OPERABLE status. CTS 3.4.11 Action g provides an option to restore either the inoperable PORV(s) or the inoperable block valve(s) to OPERABLE status. ITS 3.4.11 does not include the explicit option to restore the valves to OPERABLE status. This changes the CTS by eliminating the option to restore the valves to OPERABLE status. The purpose of the CTS Actions are to provide all of the acceptable options for inoperable PORVs and block valves. This change is administrative because the requirements have not changed. LCO 3.0.3 states that upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated. Therefore, it is not necessary to provide the option to restore the inoperable valves to OPERABLE status. When they are restored, LCO 3.0.2 allows exiting from the Condition. This change is administrative as it is a change required by the ITS usage rules that does not result in a technical change to the CTS.	N/A	3.4.11 Actions a, b, c, d, e, f, and g
3.4.11 A.4	CTS 3.4.11 Action e specifies the compensatory actions for one inoperable block valve. CTS 3.4.11 Action f specifies the compensatory actions for two or three inoperable block valves. ITS 3.4.11 ACTION C specifies the Required Actions for one inoperable block valve, ITS 3.4.11 ACTION E specifies the Required Actions for two inoperable block valves, and ITS 3.4.11 ACTION G specifies the Required Actions for three inoperable block valves. The ITS 3.4.11 ACTIONS C, E, and G Required Actions are preceded by a Note that states that the specified Required Action (C.1, E.1, or G.1) does not apply when the block valve is inoperable solely as a result of complying with Required Action B.2. ITS 3.4.11 Required Action B.2 requires the removal of power from the applicable block valve when a PORV is inoperable. This changes the CTS by adding the clarification Note that the Required Action to place the PORV in manual control is not applicable when the block valve is inoperable solely due to complying with the ACTIONS for an inoperable PORV. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.11 ACTIONS C, E, and G Required Actions Note	3.4.11 Actions e and f
3.4.11 A.5	CTS 4.4.11.1 states that the PORVs must be tested in accordance with Specification 4.0.5, the Inservice Testing Program requirements for ASME Code Class 1, 2, and 3 components. ITS 3.4.11 does not contain this explicit Surveillance Requirement. This changes the CTS by deleting the explicit requirement to perform the inservice testing Surveillance Requirements for ASME Code Class 1, 2, and 3 components. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.4.11.1
3.4.12 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.12	3/4.4.9.3, LCO 3.1.2.3.b footnote *, 3.1.2.3 Action b, 4.1.2.3.2, 3.4.1.4 Applicability footnote ***, LCO 3.5.3.a footnote #, 3.5.3 Action c, 4.5.3.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 A.2	CTS 3.4.9.3 Action a states that the RCS must be maintained in the vented condition until the inoperable PORV or RHR safety valve has been restored to OPERABLE status. CTS 3.4.9.3 Action b states that the RCS must be maintained in the vented condition until both PORVs or one PORV and the RHR safety valve have been restored to OPERABLE status. ITS 3.4.12 does not include the explicit requirement to maintain the RCS vented until the required valves are restored to OPERABLE status. This changes the CTS by eliminating the requirement to restore the valves to OPERABLE status. The purpose of the CTS Actions are to provide all of the acceptable options for inoperable PORVs and RHR safety valves. This change is administrative because the requirements have not changed. ITS LCO 3.0.2 states that upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated. Therefore, it is not necessary to provide the requirement to maintain the RCS vented until the required valves are restored to OPERABLE status. When they are restored, LCO 3.0.2 allows exiting from the Condition. This change is administrative as it is a change required by the ITS usage rules that does not result in a technical change to the CTS.	N/A	3.4.9.3 Actions a and b
3.4.12 A.3	Unit 1 CTS 4.4.9.3.1.d states that each PORV shall be demonstrated OPERABLE by testing in accordance with the inservice test requirements for ASME Category B valves pursuant to Specification 4.0.5. Unit 1 and Unit 2 CTS 4.4.9.3.2.b states that each RHR safety valve shall be demonstrated OPERABLE by testing in accordance with the inservice test requirements for ASME Category C valves pursuant to Specification 4.0.5. ITS 3.4.12 does not contain these requirements. These changes are administrative changes because they do not result in technical changes to the CTS	N/A	4.4.9.3.1.d (Unit 1), 4.4.9.3.2.b (Unit 1 and Unit 2)
3.4.12 A.4	CTS 3.4.1.4 Applicability Footnote *** specifies restrictions for reactor coolant pump startups with one or more of the RCS cold leg temperatures less than or equal to 152ºF. In addition, the footnote states that the OPERABILITY of the reactor coolant loop(s) does not require an OPERABLE Auxiliary Feedwater System. ITS LCO 3.4.12 Note contains the requirements of this CTS Footnote, however the detail of the OPERABILITY requirements for the reactor coolant loops is not retained. This changes the CTS by deleting the detail of the OPERABILITY requirements for the reactor coolant loops. These changes are administrative changes because they do not result in technical changes to the CTS	N/A	3.4.1.4 footnote ***
3.4.13 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS	3.4.13	3/4.4.6.2, 3/4.4.5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.13 A.2	CTS 3.4.5 requires each steam generator to be OPERABLE. CTS 4.4.5.0 requires each steam generator to be demonstrated OPERABLE by performance of the augmented inservice inspection program (CTS 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, and 4.4.5.5) and the requirement of Specification 4.0.5. ITS LCO 3.4.13 specifies the RCS operational LEAKAGE limits and SR 3.4.13.2 requires the steam generator tube integrity to be performed in accordance with the Steam Generator Program. The augmented inservice inspection program has been moved to ITS 5.5.7, "Steam Generator (SG) Program," and the inspection requirements of Specification 4.0.5 have been moved outside of the Technical Specifications to the Inservice Inspection Program. This changes the CTS by deleting the explicit LCO to maintain the steam generator OPERABLE, however the testing requirements are still retained in SR 3.4.13.2 and the inservice inspection program. These changes are administrative changes because they do not result in technical changes to the CTS	LCO 3.4.13, SR 3.4.13.2	3/4.4.5
3.4.13 A.3	The Applicability of CTS 3.4.5 is MODES 1, 2, 3, and 4. CTS 3.4.5 Applicability Footnote * states that the Specification does not apply in MODE 4 while performing crevice flushing as long as the requirements of LCO 3.4.1.3, Reactor Coolant Loops and Coolant Circulation - Hot Shutdown, are maintained. CTS 3.4.1.3 specifies the requirements for circulation and heat removal capability of the reactor coolant loops during MODE 4 operations. The operational LEAKAGE limits are specified in ITS 3.4.13 and the Surveillance Requirements of CTS 4.4.5 have been included as ITS SR 3.4.13.2 as discussed in DOC A.2. The Applicability is MODES 1, 2, 3, and 4. There is no allowance for steam generator integrity not to be met in MODE 4. This changes the CTS by deleting the explicit Note concerning crevice flushing. The purpose of CTS 3/4.4.5 is to ensure the integrity of the steam generators is maintained in MODES 1, 2, 3, and 4. The purpose of CTS 3/4.4.1.3 is to ensure the appropriate systems and components are available to ensure reactor coolant circulation and decay heat removal capability during MODE 4 operations. ITS 3.4.13 continues to help ensure the integrity of the steam generators and ITS 3.4.6 continues to ensure the appropriate systems and components are available to ensure reactor coolant circulation and decay heat removal. The Note is not included since the allowance for steam generator integrity not being met is not used and needed. Steam generator integrity is always necessary during MODES 1, 2, 3, and 4 even during crevice flushing. It is an ITS convention to not include these types of footnotes or cross-references. This change is administrative as it incorporates an ITS convention with no technical change to the CTS.	3.4.13 Applicability	3.4.5 Applicability footnote *
3.4.14 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.14	LCO 3.4.6.2.f, 3.4.6.2 Action c, 4.4.6.2.2, Table 3.4-0, 4.5.2.d.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.14 A.2	CTS 3.4.6.2.f specifies the leakage limits for the Reactor Coolant System pressure isolation valves at a Reactor Coolant System average pressure within 20 psi of the nominal full pressure value. ITS SR 3.4.14.1 also specifies the leakage limit, but specifies it for the allowed Reactor Coolant System pressure range ≥ 2065 psig and ≤ 2105 psig (Unit 1) and ≥ 2215 psig and ≤ 2255 psig (Unit 2). This changes the CTS by providing the actual pressure limits. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.4.14.1	LCO 3.4.6.2.f
3.4.14 A.3	CTS 3.4.6.2 Action c specifies the compensatory actions to take when the leakage by any RCS PIV(s) is greater than the specified limit. ITS ACTIONS A and B also state the appropriate compensatory actions under the same condition, however, ITS 3.4.14 ACTIONS Note 1 has been added. ITS 3.4.14 ACTIONS Note 1 allows separate entry condition for each RCS PIV flow path. This changes the CTS by explicitly stating that the Action is to be taken separately for each inoperable RCS PIV flow path. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.14 ACTIONS Note 1	3.4.6.2 Actions c
3.4.14 A.4	CTS 3.4.6.2 Action c specifies the compensatory actions to take when the leakage through any RCS PIV(s) is greater than the specified limit. ITS 3.4.14 ACTIONS A and B also state the appropriate compensatory actions under the same condition, however, ITS 3.4.14 ACTIONS Note 2 has been added. ITS 3.4.14 ACTIONS Note 2 states "Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV." This changes the CTS by explicitly stating that the Conditions and Required Actions for systems made inoperable by an inoperable RCS PIV must be entered. These changes are administrative changes because they do not result in technical changes to the CTS	3.4.14 ACTIONS Note 2	3.4.6.2 Actions c
3.4.14 A.5	CTS Table 3.4-0 contains the maximum allowable leakage value for each RCS PIV. ITS SR 3.4.14.1 specifies the limit to be ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm. This changes the CTS by deleting the explicit value for each valve. These changes are administrative changes because they do not result in technical changes to the CTS	SR 3.4.14.1	Table 3.4-0
3.4.14 A.6	CTS 4.5.2.d.1 requires verification, when the Reactor Coolant System pressure is above 600 psig, that the automatic interlock action to prevent opening of the suction of the RHR System from the Reactor Coolant System is OPERABLE. In the ITS, this Surveillance has been included as ITS SR 3.4.14.2. In addition, a new LCO has been added which requires the Residual Heat Removal System interlock to be OPERABLE. This changes the CTS by including the Residual Heat Removal System interlock Surveillance Requirement with the RCS PIV leakage limits and adding a new LCO for the interlock. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.14 (second part)	4.5.2.d.1
3.4.14 A.7	CTS 4.5.2.d.1 requires the “automatic” interlock action to prevent opening of the suction of the Residual Heat Removal (RHR) System from the Reactor Coolant System (RCS) when the RCS pressure is above 600 psig. ITS SR 3.4.14.2 requires verification that the RHR System interlock prevents the valves from being opened with a RCS pressure signal greater than or equal to 600 psig. This changes the CTS be deleting the word “automatic” from the Surveillance requirement. This change is designated as administrative because it does not result in technical changes to the CTS.	SR 3.4.14.2	4.5.2.d.1

Table A - Administrative Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.15	3/4.4.6.1, Table 3.3-6, Table 4.3-3
3.4.15 A.2	CTS LCO 3.4.6.1.b requires the containment sump "level and flow" monitoring "system" to be OPERABLE. CTS 4.4.6.1.b requires the containment sump "level and flow" monitoring "system" to be calibrated. ITS LCO 3.4.15.a requires one containment sump monitor in each sump to be OPERABLE and ITS SR 3.4.15.3 requires the performance of CHANNEL CALIBRATION of the required containment sump monitors. This changes the CTS by explicitly writing the LCO statement and SR to match the CNP design. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.4.15.a, SR 3.4.15.3	LCO 3.4.6.1.b, 4.4.6.1.b
3.4.15 A.3	CTS 4.4.6.1.a and Table 4.3-3 require that the Leakage Detection System particulate and noble gas channels be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST. ITS SR 3.4.15.2 requires the performance of a CHANNEL OPERATIONAL TEST (COT) of the required containment atmosphere radioactivity monitors. This changes the CTS by changing the CHANNEL FUNCTIONAL TEST requirements to a COT. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.4.15.2	4.4.6.1.a, Table 4.3-3
3.4.16 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.16	3/4.4.8
3.4.16 A.2	CTS 3.4.8 Action a (MODES 1, 2, 3, 4, and 5) and CTS Table 4.4-4, Footnote #, require the isotopic analysis for iodine to be performed until the specific activity of the primary coolant system is restored to within limits. ITS 3.4.16 Required Action A.1 requires this same analysis, however the explicit statement to perform the isotopic analysis for iodine until the limits are met has been deleted. This changes the CTS by deleting the explicit statement to perform the isotopic analysis for iodine until the limits are met. These changes are administrative changes because they do not result in technical changes to the CTS.	3.4.16 Required Action A.1	3.4.8 Action a

Table A - Administrative Changes
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.1	3/4.5.1
3.5.1 A.2	CTS 3.5.1 requires "each" reactor coolant system accumulator to be OPERABLE. ITS LCO 3.5.1 requires "four" ECCS accumulators to be OPERABLE. This changes the CTS by specifying the exact number of ECCS accumulators required to be OPERABLE. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.5.1	LCO 3.5.1
3.5.1 A.3	CTS 3.5.1 does not contain a specific ACTION for two or more accumulators inoperable. With two or more accumulators inoperable, CTS 3.0.3 would be entered. ITS 3.5.1 ACTION D directs entry into LCO 3.0.3 when two or more accumulators are inoperable. This changes the CTS by specifically stating to enter LCO 3.0.3 in this System Specification. These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.1 ACTION D	3.0.3
3.5.1 A.4	CTS 4.5.1.b requires each affected accumulator be demonstrated OPERABLE within 6 hours after each solution volume increase that is not the result of addition from the refueling water storage tank (RWST) of ≥ 1% of tank volume by verifying the boron concentration of the accumulator solution. ITS SR 3.5.1.4 requires verifying boron concentration once within 6 hours after each solution volume increase that is not the result of addition from the RWST of ≥ 13 ft^3. This changes CTS by changing the parameter value of solution volume increase of ≥ 1% of tank volume to solution volume increase of ≥ 13 ft^3. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.5.1.4	4.5.1.b
3.5.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.2	3/4.5.2
3.5.2 A.2	CTS 3.5.2 Action b requires, with a safety injection cross tie valve closed, either restoring the cross tie valve to the open position or reducing core power to ≤ 3304 MWt within 1 hour. Unit 2 ITS 3.5.2 ACTION D does not state the requirement to restore a closed safety injection cross tie valve to the open position, but includes the other compensatory Required Action to reduce power within 1 hour. This changes the Unit 2 CTS by not explicitly stating the requirement to restore a closed safety injection cross tie valve to the open position. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.5.2 Action b (Unit 2 only)

Table A - Administrative Changes
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 A.3	Not used.		
3.5.2 A.4	CTS 3.5.2 Action b is applicable whenever “a safety injection cross-tie valve” is closed. Unit 2 ITS ACTION D is applicable whenever “One or more Safety Injection cross-tie valves” are closed. This changes the Unit 2 CTS by clarifying that action is required whenever either or both of the safety injection cross-tie valves are closed. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.5.2 Action b (Unit 2 only)
3.5.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.3	3/4.5.3
3.5.3 A.2	CTS 4.5.3.1 states that the ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2. ITS SR 3.5.3.1 states the specific Surveillances of ITS 3.5.2 that must be performed, and adds a NOTE modifying the acceptance criteria of ITS 3.5.2.2. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.5.3.1	4.5.3.1
3.5.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.4	3/4.5.5
3.5.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.5	LCO 3.4.6.2.e, 3.4.6.2 Action b, 4.4.6.2.1.c
3.5.5 A.2	CTS 3.4.6.2 Action b provides the actions for when any Reactor Coolant System (RCS) leakage is greater than any one of the above limits, excluding PRESSURE BOUNDARY LEAKAGE. The Condition for ITS 3.5.5 ACTION A is specific as to which of the RCS leakage limits is not met, specifically, the seal injection flow resistance not within limits. This changes the CTS by replacing "Reactor Coolant System leakage greater than any one of the above limits, excluding PRESSURE BOUNDARY LEAKAGE" with "seal injection flow resistance not within limit." These changes are administrative changes because they do not result in technical changes to the CTS.	3.5.5 Condition A	3.4.6.2 Action b

Table A - Administrative Changes
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.5 A.3	CTS 3.4.6.2.e Applicability Footnote * states that Specification 3.4.6.2.e is applicable with average pressure within 20 psi "of the nominal full pressure value." CTS 4.4.6.2.1.c states that the seal line resistance shall be determined when the average pressurizer pressure is within 20 psi "of its nominal full pressure value." The ITS SR 3.5.5.1 Note states that the Surveillance is not required to be performed until 4 hours after the pressurizer pressure stabilizes at ≥ 2065 psig and ≤ 2105 psig (Unit 1) and ≥ 2215 psig and ≤ 2255 psig (Unit 2). This changes the CTS by including the explicit pressure limits. Changes to the detail that the pressurizer pressure must be an average pressure are discussed in DOC LA.1 and changes to the pressure band are discussed in DOC M.1. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.5.5.1 Note	LCO 3.4.6.2.e Applicability footnote *, 4.4.6.2.1.c

Table A - Administrative Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.1	3/4.6.1.1, 1.8, 3/4.6.1.2, 3/4.6.1.6
3.6.1 A.2	CTS 3.6.1.1 states "Primary CONTAINMENT INTEGRITY shall be maintained." CTS 3.6.1.2 requires containment leakage rates be within specified parameters. CTS 3.6.1.6 requires that the structural integrity of the containment be maintained within specified parameters. ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by deleting the specific CONTAINMENT INTEGRITY definition and all references to it, as well as combining the containment requirements of CTS 3.6.1.1, CTS 3.6.1.2, and CTS 3.6.1.6 into one LCO statement. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.6.1	LCO 3.6.1.1, LCO 3.6.1.2, LCO 3.6.1.6
3.6.1 A.3	CTS 4.6.1.1.b requires that Primary CONTAINMENT INTEGRITY shall be demonstrated by verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3. The ITS does not include the reference to CTS 3.6.1.3 (which has changed to ITS 3.6.2). This changes the CTS by not including a reference to another LCO that is required in the same MODES. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.6.1.1.b
3.6.1 A.4	CTS 3.6.1.2 Action does not state what action to take if specific leakage rate limits are not met while in MODE 1, 2, 3, or 4; it only includes a requirement that the limits be restored prior to increasing Reactor Coolant System temperature above 200°F (i.e., MODE 4). CTS 3.6.1.6 Action does not state what action to take if the structural integrity limits are not met while in MODE 1, 2, 3, or 4; it only includes a requirement that the limits be restored prior to increasing Reactor Coolant System temperature above 200°F (i.e., MODE 4). Thus, entry into CTS 3.0.3 is required if CTS 3.6.1.2 or CTS 3.6.1.6 is not met while in MODE 1, 2, 3, or 4. CTS 3.0.3 allows 1 hour to prepare for a shutdown and requires the unit to be in MODE 3 within 7 hours and MODE 5 within 37 hours. ITS 3.6.1 ACTION A requires that if the containment is inoperable, it must be restored to OPERABLE status within 1 hour. ITS 3.6.1 ACTION B requires that if the Required Action and associated Completion Time are not met (i.e., the containment is not restored to OPERABLE status in 1 hour), the unit must be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes CTS by stating the ACTIONS rather than deferring to CTS 3.0.3. In addition, it deletes the CTS Actions to restore the limits prior to entering MODE 4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.1 ACTIONS A and B	3.0.3
3.6.1 A.5	CTS 4.6.1.2 and CTS 4.6.1.6 reference specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. CTS 4.6.1.2 also states "The provisions of Specification 4.0.2 are not applicable." ITS SR 3.6.1.1 requires performance of visual examinations and leakage rate testing, except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program. This changes CTS by referencing the appropriate Containment Leakage Rate Testing Program. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.1.1	4.6.1.2, 4.6.1.6

Table A - Administrative Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.2	3/4.6.1.3, 1.8.3
3.6.2 A.2	CTS 3.6.1.3 states "Each containment air lock shall be OPERABLE." CTS 3.6.1.3 Action a states "With an air lock inoperable" and specifies Actions to be taken. ITS 3.6.2 ACTIONS Note 2 states "Separate Condition entry is allowed for each air lock." ITS 3.6.2 Condition C states "One or more containment air locks inoperable for reasons other than Condition A or B." This changes the CTS by clarifying the current intent of applying the CTS Actions to each air lock separately. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.2 ACTIONS Note 2	LCO 3.6.1.3, 3.6.1.3 Action a
3.6.2 A.3	CTS 3.6.1.3 does not include a reference to entering applicable Conditions and Required Actions of the CONTAINMENT INTEGRITY LCO (CTS 3.6.1.1) (changed to containment OPERABILITY in the ITS). ITS 3.6.2 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate." This changes the CTS by explicitly requiring the Containment Actions be entered when the Containment LCO is not met as a result of air lock leakage exceeding limits. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.2 ACTIONS Note 3	3.6.1.2
3.6.2 A.4	CTS 4.6.1.3.a references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. This changes CTS by referencing the appropriate Containment Leakage Rate Testing Program. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.2.1	4.6.1.3.a
3.6.2 A.5	CTS 4.6.1.3.a references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 1 states "An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test." This changes the CTS by adding a Note as a reminder that either air lock door is capable of providing a fission product barrier in the event of a DBA. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.2.1 Note 1	4.6.1.3.a
3.6.2 A.6	CTS 4.6.1.3.a references specific 10 CFR 50, Appendix J, Option B requirements, and other specific leakage rate criteria. ITS SR 3.6.2.1 requires performance of containment air lock leakage rate testing in accordance with the Containment Leakage Rate Testing Program. ITS SR 3.6.2.1 Note 2 states "Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1." This changes the CTS by adding a Note as a reminder that the air lock leakage must be accounted for in determining the combined Type B and C containment leakage rate. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.2.1 Note 2	4.6.1.3.a

Table A - Administrative Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3	3/4.6.3.1, 3.6.1.1 Action, 4.6.1.1.a.1, 3/4.6.1.7
3.6.3 A.2	CTS 3.6.3.1 states that the Actions of CTS 3/4.6.3.1 are not applicable to the containment purge supply and exhaust isolation valves. The Actions for these valves are provided in CTS 3/4.6.1.7. The ITS combines these two CTS Specifications into one Specification, ITS 3.6.3. Therefore this CTS statement is not necessary and has been deleted. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3	LCO 3.6.3.1, LCO 3.6.1.7
3.6.3 A.3	CTS 3.6.3.1 Action provides requirements to be taken for each containment isolation valve that is inoperable. The ITS includes an explicit Note (ACTIONS Note 2) that provides instructions for the proper application of the ACTIONS for ITS compliance (i.e., Separate Condition entry is allowed for each penetration flow path). This changes the CTS by providing explicit direction as to how to utilize the ACTIONS when a containment isolation valve is inoperable. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3 ACTIONS Note 2	3.6.3.1 Actions
3.6.3 A.4	CTS 3.6.3.1 does not specifically require Conditions to be entered for systems supported by inoperable containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.3 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves." ITS LCO 3.0.6 provides an exception to ITS LCO 3.0.2, stating "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." This changes the CTS by adding a specific statement to require supported system Conditions and Required Actions be entered, whereas in the CTS this would be done without the Note. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3 ACTIONS Note 3	1.6
3.6.3 A.5	CTS 3.6.3.1 and CTS 3.6.1.7 do not include a reference to entering applicable Conditions and Actions of the CONTAINMENT INTEGRITY LCO (CTS 3.6.1.1) (changed to containment OPERABILITY in the ITS). ITS 3.6.3 ACTIONS Note 4 states "Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when leakage for a penetration flow path results in exceeding the overall containment leakage rate acceptance criteria." This changes the CTS by explicitly stating an existing requirement that the Containment Specification Actions be taken when the Containment LCO is not met as a result of containment isolation valve leakage exceeding limits. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3 ACTIONS Note 4	3.6.1.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.6	CTS 3.6.3.1 Action a requires restoring the inoperable valve(s) to OPERABLE status within 4 hours with one or more of the containment isolation valves inoperable, or taking one of the other specified compensatory actions. CTS 3.6.1.7 Action a requires either restoring an inoperable containment purge supply or exhaust isolation valve or deactivating the automatic valve used to isolate the affected penetration in the closed position within 72 hours. ITS 3.6.3 does not state the requirement to restore an inoperable isolation valve to OPERABLE status, but includes other compensatory Required Actions to take within 4 hours or 72 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.6.3.1 Action a, 3.6.1.7 Action a
3.6.3 A.7	Not used.		
3.6.3 A.8	CTS 4.6.3.1.3 (Unit 1) and CTS 4.6.3.1.3.1 (Unit 2) require the isolation time of each power operated or automatic containment isolation valve be determined to be within its limit when tested pursuant to Specification 4.0.5. ITS SR 3.6.3.4 requires verifying the isolation time of each automatic power operated containment isolation valve is within limits, with a Frequency in accordance with the Inservice Testing Program. This changes the CTS by stating that the Frequency is in accordance with the Inservice Testing Program. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.3.4	4.6.3.1.3 (Unit 1), 4.6.3.1.3.1 (Unit 2)
3.6.3 A.9	CTS 4.6.1.7.1, the Surveillance Requirement for the containment purge supply and exhaust system valves, states that the Surveillance Requirements of CTS 3/4.6.1.2 and CTS 3/4.6.3.1 apply. The ITS combines CTS 3/4.6.1.7 and CTS 3/4.6.3.1 into one Specification, ITS 3.6.3. In addition, the Surveillances of CTS 3/4.6.1.2, the Containment Leakage Specification, are adequately covered in ITS 3.6.1. Therefore this CTS statement is not necessary and has been deleted. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.6.1.7.1
3.6.3 A.10	The CTS 3.6.3.1 Action states that with one or more of the containment isolation valve(s) inoperable, "maintain at least one isolation valve OPERABLE in each affected penetration that is open." ITS 3.6.3 Conditions A and B Notes state "Only applicable to penetration flow paths with two containment isolation valves." ITS 3.6.3 Required Action A.1 requires the affected flow path be isolated by one of the means specified when one or more penetration flow paths have one containment isolation valve inoperable. ITS 3.6.3 Required Action A.1 assumes the other isolation valve is OPERABLE for the isolation function. If two valves in a penetration flow path with two containment isolation valves are inoperable, ACTION B provides the appropriate actions to be taken. This changes the Unit 2 CTS by incorporating the concept of assuring that the second means of containment isolation for a penetration flow path is OPERABLE into the Conditions and Required Actions associated with ITS 3.6.3 ACTIONS A and B. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3 ACTIONS A and B	3.6.3.1 Action (Unit 2 only)

Table A - Administrative Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.3 A.11	CTS 3.6.3.1 Action does not include any actions when two containment isolation valves in a single penetration are inoperable and the associated penetration is open. Thus, CTS 3.0.3 must be entered if this occurs. ITS 3.6.3 ACTION B states that with one or more penetration flow paths with two containment isolation valves inoperable, isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange within 1 hour. ITS 3.6.3 ACTION D requires the unit be placed in MODE 3 in 6 hours and MODE 5 in 36 hours if Required Action and associated Completion Time of Condition B is not met. This changes the Unit 2 CTS by stating the Actions to be taken for two containment isolation valves inoperable in the containment isolation valve Specification, rather than relying on CTS 3.0.3, which essentially contains the same Completion Times for isolating the affected penetration or placing the unit outside its MODE of Applicability. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.3 ACTIONS B and D	3.6.3.1 Action (Unit 2 only)
3.6.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.4	3/4.6.1.4
3.6.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.5	3/4.6.1.5
3.6.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.6	3/4.6.2.1
3.6.6 A.2	CTS 3.6.2.1 Action states that with one Containment Spray System inoperable, if the Containment Spray System is not restored to OPERABLE status within 72 hours, then the unit must be in HOT STANDBY within the next 6 hours, and to either restore the inoperable Containment Spray System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours. With an inoperable containment spray train not restored to OPERABLE status in 72 hours, ITS 3.6.6 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within 84 hours. ITS 3.6.6 does not contain the second phrase stating that the Containment Spray System (i.e., train) must be restored to OPERABLE status after the unit is in MODE 3, but combines the time allowed for restoration and to be in MODE 5 together into one Required Action to be in MODE 5. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.6 ACTION B	3.6.2.1 Action

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.6 A.3	CTS 3/4.6.2.1 is applicable in MODES 1, 2, 3, and 4. CTS 4.6.2.1.c.1 requires verification of the automatic actuation of the Containment Spray System valves. CTS 4.6.2.1.c.2 requires verification of the automatic actuation of the Containment Spray System pumps. The requirements for these Surveillances are included in ITS SR 3.6.6.3 and SR 3.6.6.4, respectively; however, a Note has been included in the SRs that states that in MODE 4, only the manual portion of the actuation signal is required. This changes the CTS by not requiring automatic actuation in MODE 4. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.6.6.3 and SR 3.6.6.4 Note	4.6.2.1.c.1, 4.6.2.1.c.2
3.6.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.7	3/4.6.2.2
3.6.7 A.2	CTS 3.6.2.2 Action states that with the Spray Additive System inoperable, if the Spray Additive System is not restored to OPERABLE status within 72 hours, then the unit must be in HOT STANDBY within the next 6 hours, and to either restore the Spray Additive System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours. With an inoperable Spray Additive System not restored to OPERABLE status in 72 hours, ITS 3.6.7 ACTION B requires the unit to be in MODE 3 within 6 hours and MODE 5 within the 84 hours. ITS 3.6.7 does not contain the second phrase stating that the Spray Additive System (i.e., train) must be restored to OPERABLE status after the unit is in MODE 3, but combines the time allowed for restoration and to be in MODE 5 together into one Required Action to be in MODE 5. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.7 ACTION B	3.6.2.2 Action
3.6.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.8	3/4.6.4.2
3.6.9 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.9	3/4.6.4.3
3.6.9 A.2	CTS 3.6.4.3 Action b requires the performance of the Surveillance Requirement 4.6.4.3.a once per 7 days on the OPERABLE train until the inoperable train is restored to OPERABLE status. ITS 3.6.9 Required Action A.2 requires the performance of SR 3.6.9.1 on the OPERABLE train once per 7 days under the same conditions. This changes the CTS by deleting the detail that the Surveillance Requirement must be performed until the inoperable train is restored to OPERABLE status. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.9 Required Action A.2	3.6.4.3 Action b

Table A - Administrative Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.10 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.10	3/4.6.5.6
3.6.11 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.11	3/4.6.5.1
3.6.12 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.12	3/4.6.5.3
3.6.13 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.13	3/4.6.5.5, 3/4.6.5.9
3.6.13 A.2	CTS 3.6.5.5 requires the personnel access doors and equipment hatches between the containment's upper and lower compartments to be OPERABLE and closed. CTS 3.6.5.9 requires the divider barrier seal to be OPERABLE. ITS LCO 3.6.13 requires the divider barrier integrity to be maintained. This changes the CTS by combining the divider barrier requirements of CTS 3.6.5.5 and CTS 3.6.5.9 into one LCO statement. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.13	3/4.6.5.5, 3/4.6.5.9
3.6.13 A.3	CTS 3.6.5.5 Action provides the actions to take when a personnel access door or equipment hatch is inoperable. ITS 3.6.13 ACTION A provides an action for one or more personnel access doors or equipment hatches open or inoperable. In addition, ITS 3.6.13 Condition A includes a Note that allows separate Condition entry for each personnel access door or equipment hatch. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable personnel access door or equipment hatch. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.13 Condition A Note	3.6.5.5 Action

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.13 A.4	CTS 3.6.5.9 Action does not state what action to take if the divider barrier seal is inoperable while in MODE 1, 2, 3, or 4; it only includes a requirement that the divider barrier seal be restored to OPERABLE status prior to increasing Reactor Coolant System temperature above 200°F (i.e., MODE 4). Thus, entry into CTS 3.0.3 is required if CTS 3.6.5.9 is not met while in MODE 1, 2, 3, or 4. CTS 3.0.3 allows 1 hour to prepare for a shutdown and requires the unit to be in MODE 3 within 7 hours and MODE 5 within 37 hours. ITS 3.6.13 ACTION B requires that if the divider barrier seal is inoperable, it must be restored to OPERABLE status within 1 hour. ITS 3.6.13 ACTION C requires that if the Required Action and associated Completion Time are not met (i.e., the divider barrier seal is not restored to OPERABLE status in 1 hour), the unit must be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by stating the ACTIONS within the Specification rather than deferring to CTS 3.0.3. In addition, it deletes the Action to restore the limits prior to entering MODE 4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.13 ACTIONS B and C	3.0.3
3.6.14 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.14	3/4.6.5.7, 3/4.6.5.8
3.6.14 A.2	The CTS 3.6.5.7 Action does not state what action to take if the ice condenser floor drains are inoperable while in MODE 1, 2, 3, or 4; it only includes a requirement that the ice condenser floor drains be restored to OPERABLE status prior to increasing Reactor Coolant System temperature above 200°F (i.e., MODE 4). The CTS 3.6.5.8 Action does not state what action to take if the refueling canal drains are inoperable while in MODE 1, 2, 3, or 4; it only includes a requirement that the refueling canal drains be restored to OPERABLE status prior to increasing Reactor Coolant System temperature above 200°F (i.e., MODE 4). Thus, entry into CTS 3.0.3 is required if CTS 3.6.5.7 or CTS 3.6.5.8 is not met while in MODE 1, 2, 3, or 4. CTS 3.0.3 allows 1 hour to prepare for a shutdown and requires the unit to be in MODE 3 within 7 hours and MODE 5 within 37 hours. ITS 3.6.14 ACTION A requires that if one ice condenser floor drain is inoperable, it must be restored to OPERABLE status within 1 hour. ITS 3.6.14 ACTION B requires that if one required refueling canal drain is inoperable, it must be restored to OPERABLE status within 1 hour. ITS 3.6.14 ACTION C requires that if the Required Action and associated Completion Time are not met (i.e., the ice condenser or refueling canal drain is not restored to OPERABLE status in 1 hour), the unit must be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by stating the ACTIONS within the Specification rather than deferring to CTS 3.0.3. In addition, it deletes the Actions to restore the limits prior to entering MODE 4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.6.14 ACTIONS A, B, and C	3.0.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.1	3/4.7.1.1
3.7.1 A.2	CTS 3.7.1.1 Actions a and b provide compensatory actions for one or more inoperable MSSVs. CTS 3.7.1.1 Action a requires that within 4 hours the MSSV(s) be restored to OPERABLE status or the Power Range Neutron Flux High Setpoint Trip(s) be reduced in accordance with the requirements of CTS Table 3.7-1. CTS 3.7.1.1 Action b requires that within 4 hours the MSSV(s) be restored to OPERABLE status or the reactor trip breakers are opened. ITS 3.7.1 ACTIONS Note states "Separate Condition entry is allowed for each MSSV." This changes the CTS by explicitly specifying separate condition entry for each inoperable MSSV. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.1 ACTIONS Note	3.7.1.1 Actions a and b
3.7.1 A.3	CTS 3.7.1.1 Actions a and b state that with one or more main steam line code safety valves inoperable to either restore the inoperable valves to OPERABLE status or to take an alternate compensatory measure. ITS 3.7.1 ACTION A does not include the restoration requirement, only the alternate compensatory measure. This changes the CTS by eliminating the explicit statement to restore the MSSV(s) to OPERABLE status. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.7.1.1 Actions a and b
3.7.1 A.4	CTS 3.7.1.1 Action a states that the Power Range Neutron Flux - High Setpoint trip must be reduced per CTS Table 3.7-1 when one or more MSSVs are found to be inoperable. CTS Table 3.7-1 provides the maximum allowable Power Range Neutron Flux - High Setpoint corresponding to the maximum number of inoperable MSSVs on any operating steam generator. ITS 3.7.1 ACTION A requires both a reduction in THERMAL POWER and a reduction in the Power Range Neutron Flux - High reactor trip setpoint consistent with the requirements of ITS Table 3.7.1-1. The Table has been revised slightly to provide the associated maximum allowable power for the number of OPERABLE MSSVs. This changes the CTS by adding an additional explicit statement to reduce THERMAL POWER consistent with ITS Table 3.7.1-1 and by stating the maximum allowable power as a function of OPERABLE, instead of inoperable, MSSVs. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.1 Required Action A.1, Table 3.7.1-1	3.7.1.1 Action a, Table 3.7-1
3.7.1 A.5	Not used.		
3.7.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.2	3/4.7.1.5

Table A - Administrative Changes
ITS Section 3.7 - Plant Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.2 A.2	The CTS 3.7.1.5 Action for MODES 2 and 3 requires entry when one or more steam generator stop valves are inoperable. ITS 3.7.2 ACTION C includes a Condition Note that specifies separate Condition entry is allowed for each SGSV. The Condition also specifies entry for one or more inoperable SGSVs. This changes the CTS by clearly specifying separate entry Condition for each inoperable SGSV. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.2 Condition C Note	3.7.1.5 Action for MODES 2 and 3
3.7.2 A.3	Not used.		
3.7.2 A.4	CTS 4.7.1.5.1 states that each SGSV valve that is open shall be demonstrated OPERABLE by verifying full closure within 8 seconds. ITS 3.7.2.1 states to verify the isolation time of each SGSV is ≤ 8 seconds. This changes the CTS by deleting the explicit phrase to test each SGSV "that is open." These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.2.1	4.7.1.5.1
3.7.2 A.5	CTS 4.7.1.5.3 specifies that the provisions of Specification 4.0.4 are not applicable for entry into MODE 2 when performing PHYSICS TESTS at the beginning of the cycle provided the steam generator stop valves are maintained closed. ITS 3.7.2 does not contain this explicit allowance. This changes the CTS by deleting the explicit allowance when performing PHYSICS TESTS. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.7.1.5.3
3.7.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.5	3/4.7.1.2
3.7.5 A.2	CTS 4.7.1.2.c requires the verification of the position of each non-automatic valve in the flow path. CTS 4.7.1.2.d requires the verification of the position of each automatic valve in the flow path. ITS SR 3.7.5.1 requires the verification of the position of each manual, power operated, and automatic valve. This changes the CTS by replacing the term "non-automatic" with "manual, power operated." These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.5.1	4.7.1.2.c, 4.7.1.2.d
3.7.5 A.3	CTS 4.7.1.2.c requires verification that each AFW valve in the flow path is in its correct position. ITS SR 3.7.5.1 requires verification that each AFW valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump is in its correct position. This changes CTS 4.7.1.2.c by expanding the description of the applicable flow path to specifically include the power operated steam supply valves to the turbine driven AFW pump. These valves are currently considered required to be verified by CTS 4.7.1.2.c. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.5.1	4.7.1.2.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.6	3/4.7.1.3
3.7.6 A.2	The CTS 3.7.1.3 Actions provide two compensatory actions for when the CST is found to be inoperable. CTS 3.7.1.3 Action a allows four hours to restore the CST to OPERABLE status or be in MODE 4 within the next 12 hours. CTS 3.7.1.3 Action b alternatively allows 4 hours to demonstrate the OPERABILITY of the Essential Service Water System as a backup supply to the auxiliary feedwater pumps and restore the CST tank to OPERABLE status within 7 days or be in MODE 4 within the next 12 hours. ITS 3.7.6 Required Action A.1 requires the verification by administrative means of an OPERABLE backup water supply at a Completion Time of 4 hours and once per 12 hours thereafter and Required Action A.2 requires the CST to be restored to OPERABLE status within 7 days. This changes the CTS by deleting the alternative requirement in CTS 3.7.1.3 Action a to restore the CST to OPERABLE status within 4 hours. Other changes to the CTS 3.7.1.3 Actions are discussed in DOCs M.2, LA.1, and L.1. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	3.7.1.3 Action a
3.7.6 A.3	CTS 4.7.1.3.1 states that the CST shall be demonstrated OPERABLE at least once per 12 hours by verifying the water level is within its limits when the tank is the supply source for the auxiliary feedwater pumps. ITS SR 3.7.6.1 states that the CST volume must be verified to be within the specified limit. This changes the CTS by deleting detail that the Surveillance must be performed when the CST is the supply source for the auxiliary feedwater pumps. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.6.1	4.7.1.3.1
3.7.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.7	3/4.7.3.1
3.7.7 A.2	CTS 4.7.3.1 does not contain an explicit reference to isolating CCW flow to individual components. ITS SR 3.7.7.1 contains a Note which states, "Isolation of CCW flow to individual components does not render the CCW System inoperable." This changes CTS by adding an allowance that is not explicitly stated in the CTS. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.7.1 Note	4.7.3.1.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.7 A.3	CTS 4.7.3.1.a requires verification that each CCW valve (manual, power operated, or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. CTS 4.7.3.1.b requires verification that each CCW automatic valve servicing safety related equipment actuates to its correct position on a Safety Injection test signal. ITS SR 3.7.7.1 requires verification that each CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. ITS SR 3.7.7.2 requires verification that each CCW 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. This changes the CTS by adding the words "in the flow path" to CTS 4.7.3.1.a (ITS SR 3.7.7.1) and replacing the words "servicing safety related equipment" with "in the flow path" in CTS 4.7.3.1.b (ITS SR 3.7.7.2). Another change to CTS 4.7.3.1.a is discussed in DOC A.2. Other changes to CTS 4.7.3.1.b are discussed in DOCs LA.2, L.2, L.3, and L.4. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.7.1, SR 3.7.7.2	4.7.3.1.a, 4.7.3.1.b
3.7.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.8	3/4.7.4.1
3.7.8 A.2	CTS 4.7.4.1 does not contain an explicit reference to isolating ESW flow to individual components. ITS SR 3.7.8.1 contains a Note that states "Isolation of ESW flow to individual components does not render the ESW System inoperable." This changes CTS by adding an allowance that is not explicitly stated in the CTS. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.8.1 Note	4.7.4.1.a
3.7.8 A.3	CTS 4.7.4.1.a requires verification that each ESW valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in the correct position. CTS 4.7.4.1.b requires verification that each ESW automatic valve servicing safety related equipment actuates to its correct position. ITS SR 3.7.8.1 requires verification that each ESW 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. ITS SR 3.7.8.2 requires verification that each ESW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position. This changes the CTS by replacing the words "servicing safety related equipment" with "in the flow path." Other changes to CTS 4.7.4.1.a are discussed in DOC A.2 while other changes to CTS 4.7.4.1.b are discussed in DOCs LA.2, L.2, L.3, and L.4. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.8.1, SR 3.7.8.2	4.7.4.1.a, 4.7.4.1.b
3.7.10 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.10	3/4.7.5.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.10 A.2	CTS 3.7.5.1 does not provide an Action for two CREV pressurization trains inoperable for reasons other than an inoperable filter unit or an inoperable control room boundary. Thus, CTS LCO 3.0.3 would be required to be entered. ITS 3.7.10 ACTION G requires immediate entry into ITS LCO 3.0.3 when two CREV trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than Conditions B and C. Condition B covers the inoperability of two CREV trains due to an inoperable control room boundary and Condition C covers the inoperability of two CREV trains due to an inoperable filter unit. This changes the CTS by providing a specific ACTION for two inoperable trains for reasons other than due to an inoperable control room boundary or an inoperable filter unit in MODE 1, 2, 3, or 4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.10 ACTION G	3.0.3
3.7.10 A.3	During the movement of irradiated fuel assemblies, CTS 3.7.5.1 Action d allows 7 days to restore an inoperable CREV pressurization train or to initiate and maintain operation of the remaining OPERABLE train in the pressurization/ cleanup alignment. ITS 3.7.10 ACTION A provides 7 days to restore an inoperable CREV train. If not restored, then ITS 3.7.10 Required Action E.1 would require the immediate placement of the OPERABLE CREV train in the pressurization/cleanup mode or ITS 3.7.10 Required Action E.2 would require the suspension of movement of irradiated fuel assemblies. This changes the CTS by providing the alternate action to suspend movement of irradiated fuel assemblies. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.10 Required Action E.2	N/A
3.7.10 A.4	CTS 4.7.5.1.c specifies the CREV System Surveillances to be performed after any structural maintenance on the HEPA filter or charcoal adsorber housings, or following painting, fire, or chemical release in any ventilation zone communicating with the system. CTS 4.7.5.1.d specifies the CREV System Surveillances to be performed after every 720 hours of charcoal adsorber operation. CTS 4.7.5.1.e.1 specifies the CREV System Surveillance for the pressure drop across the combined HEPA filters and charcoal adsorber banks. CTS 4.7.5.1.f specifies the CREV System Surveillance after each complete or partial replacement of a HEPA filter bank. CTS 4.7.5.1.g specifies the CREV System Surveillance after each complete or partial replacement of a charcoal adsorber bank. ITS SR 3.7.10.2 requires performing required CREV System filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.5.1 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.10.2, 5.5.9	4.7.5.1.c, 4.7.5.1.d, 4.7.5.1.e.1, 4.7.5.1.f, 4.7.5.1.g
3.7.10 A.5	Not used.		
3.7.10 A.6	CTS 4.7.5.1.e.2 requires verifying that on a safety injection (SI) signal, the CREV System automatically operates in the pressurization/cleanup mode. ITS SR 3.7.10.3 covers this requirement, but also includes a Note that states the SR is only required to be met in MODES 1, 2, 3, and 4. This changes the CTS by clearly stating the MODES in which the SR must be met. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.10.3 Note	4.7.5.1.e.2, 3.3.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.10 A.7	CTS 3.7.5.1 Applicability includes "during the movement of irradiated fuel assemblies." ITS 3.7.10 Applicability includes "During movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 (Unit 1) and Unit 1 (Unit 2) containment." This changes the CTS by clarifying the locations that fuel movement is taking place. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.10 Applicability	3.7.5.1 Applicability
3.7.11 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.11	3/4.7.5.2
3.7.11 A.2	CTS 3.7.5.2 does not provide an Action for two inoperable CRAC trains. Therefore, CTS 3.0.3 would be required to be entered. ITS 3.7.11 ACTION E requires immediate entry into ITS LCO 3.0.3 when two CRAC trains are inoperable in MODE 1, 2, 3, or 4. This changes the CTS by providing a specific action for two CRAC trains inoperable in MODE 1, 2, 3, or 4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.11 ACTION E	3.0.3
3.7.12 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.12	3/4.7.6.1
3.7.12 A.2	CTS 4.7.6.1.b specifies the ESF Ventilation System Surveillances to be performed after any structural maintenance on the HEPA filter or charcoal adsorber housings, or following painting, fire, or chemical release in any ventilation zone communicating with the system. CTS 4.7.6.1.c specifies the ESF Ventilation System Surveillances to be performed after every 720 hours of charcoal adsorber operation. CTS 4.7.6.1.d.1 specifies the ESF Ventilation System Surveillance for the pressure drop across the combined HEPA filters and charcoal adsorber banks. CTS 4.7.6.1.e specifies the ESF Ventilation System Surveillance after each complete or partial replacement of a HEPA filter bank. CTS 4.7.6.1.f specifies the ESF Ventilation System Surveillance after each complete or partial replacement of a charcoal adsorber bank. ITS SR 3.7.12.2 requires performing required ESF Ventilation System filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.7.6.1 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.12.2, 5.5.9	4.7.6.1.b, 4.7.6.1.c, 4.7.6.1.d.1, 4.7.6.1.e, 4.7.6.1.f
3.7.12 A.3	CTS 4.7.6.1.d.3, the automatic actuation test, contains a footnote that states that the provisions of Technical Specification 4.0.8 are applicable. ITS does not include this provision. This changes the Unit 2 CTS by deleting the footnote. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.7.6.1.d.3 (Unit 2 only)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.13 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.13	3/4.9.12
3.7.13 A.2	CTS 3.9.12 Action a states that with no FHAEV System OPERABLE, suspend all operations involving movement of fuel within the storage pool until at least one FHAEV System is restored to OPERABLE status. ITS 3.7.13 ACTION A states that with the required FHAEV train inoperable or not in operation to suspend movement of irradiated fuel assemblies within the auxiliary building. This changes the CTS by deleting the statement "until at least one FHAEV System is restored to OPERABLE status." The change that adds "or not in operation" is discussed in DOC M.1. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.13 ACTION A	3.9.12 Action a
3.7.13 A.3	CTS 4.9.12.b specifies the FHAEV System Surveillances to be performed after any structural maintenance on the HEPA filter or charcoal adsorber housings, or following painting, fire or chemical release in any ventilation zone communicating with the system. CTS 4.9.12.c specifies the FHAEV System Surveillances to be performed after every 720 hours of charcoal adsorber operation. CTS 4.9.12.d.1 specifies the FHAEV System Surveillance for the pressure drop across the combined HEPA filters and charcoal adsorber banks. CTS 4.9.12.e specifies the FHAEV System Surveillance after each complete or partial replacement of a HEPA filter bank. CTS 4.9.12.f specifies the FHAEV System Surveillance after each complete or partial replacement of a charcoal adsorber bank. ITS SR 3.7.13.3 requires performing required FHAEV System filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 4.9.12 does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes the CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.7.13.3, 5.5.9	4.9.12.b, 4.9.12.c, 4.9.12.d.1, 4.9.12.e, 4.9.12.f
3.7.13 A.4	CTS 3.9.12 requires the spent fuel storage pool exhaust ventilation system to be OPERABLE and CTS 4.9.12 requires the spent fuel storage pool exhaust ventilation system to be demonstrated OPERABLE. ITS 3.7.13 requires one FHAEV train to be OPERABLE and in operation and the ITS 3.7.13 Surveillances only require one FHAEV train to be verified OPERABLE. This changes the CTS by clarifying that only one of the FHAEV trains is required to be OPERABLE. The change to requiring the FHAEV train to be in operation is discussed in DOC M.1. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.7.13, 3.7.13 Surveillances	LCO 3.9.12, 4.9.12
3.7.14 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.14	3/4.9.11

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.14 A.2	CTS 3.9.11 Action states that with the requirements of the Specification not satisfied, to suspend all movement of fuel assemblies. ITS 3.7.14 Required Action A.1 requires the immediate suspension of movement of irradiated fuel assemblies in the fuel storage pool. This changes the CTS by explicitly specifying that the compensatory action to suspend all movement of fuel assemblies requires an immediate response. Other changes to this CTS Action are discussed in DOCs L.1 and L.2. These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.14 Required Action A.1	3.9.11 Action
3.7.15 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.15	3/4.9.15
3.7.16 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.16	5.6.1.1.c, 5.6.1.1.c.2, 5.6.1.1.c.3
3.7.16 A.2	CTS 5.6.1.1 provides the criteria for fuel storage in the spent fuel storage pool, based on enrichment and burnup, for Regions 2 and 3. ITS LCO 3.7.16 requires that the initial enrichment and burnup of each fuel assembly stored in Region 2 or 3 meet these criteria as provided in ITS Table 3.7.16-1, "Acceptable Burnup Criteria." Furthermore, the value of E is clarified to state that it is in %. In addition, ITS 3.7.16 provides an explicit ACTION to initiate action to move the noncomplying fuel assembly from Region 2 or 3 if the requirements of the LCO are not met. This changes the CTS by moving the design criteria for spent fuel storage in Regions 2 and 3 to an explicit LCO and adds an explicit ACTION to be taken if the LCO is not met. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.7.16, Table 3.7.16-1, 3.7.16 ACTION A	5.6.1.1.c, 5.6.1.1.c.2, 5.6.1.1.c.3
3.7.17 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.7.17	3/4.7.1.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.1	3/4.8.1.1, 3.0.5
3.8.1 A.2	CTS LCO 3.8.1.1 does not contain the OPERABILITY requirements for the opposite unit qualified offsite circuit and diesel generators (DGs). However, the CTS definition of "OPERABLE - OPERABILITY" requires that, for all equipment required to be OPERABLE, all attendant equipment (this includes normal and emergency electrical sources) are also capable of performing their related support functions. New requirements were added as ITS LCO 3.8.1.c and ITS LCO 3.8.1.d. ITS LCO 3.8.1.c will require one opposite unit qualified circuit between the offsite transmission network and the opposite unit onsite Class 1E AC electrical power distribution system capable of supporting the equipment required to be OPERABLE by LCO 3.7.8, "Essential Service Water (ESW) System," and LCO 3.8.1.d will require the opposite unit DG(s) capable of supporting the equipment required to be OPERABLE by LCO 3.7.8. This changes the CTS by adding explicit AC Source requirements for the opposite unit to the LCO. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.8.1.c and d	N/A
3.8.1 A.3	CTS 3.8.1.1 Action c applies when one offsite circuit and one DG are inoperable. In this condition, an emergency bus may be de-energized. CTS LCO 3.8.2.1 provides an Action for an emergency bus that is de-energized. A Note to ITS 3.8.1 ACTION D in the Required Actions column states, "Enter applicable Conditions and Required Action of LCO 3.8.9, "Distribution System - Operating," when Condition D is entered with no AC power source to any train." This changes the CTS by requiring the compensatory actions for Distribution System - Operating to be taken if a distribution train is made inoperable by inoperable AC Sources. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.1 ACTION D Note	N/A
3.8.1 A.4	CTS LCO 3.8.1.1 does not contain an Action for more than two sources of either offsite circuits or DGs inoperable. Having more than two sources inoperable requires entering CTS LCO 3.0.3. ITS 3.8.1 ACTION G requires entering LCO 3.0.3 immediately if three or more AC Sources are inoperable. This changes the CTS by adding a specific ACTION requiring entry into LCO 3.0.3. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.1 ACTION G	3.0.3
3.8.1 A.5	CTS 4.8.1.1.2.a.4, CTS 4.8.1.1.2.e.4, CTS 4.8.1.1.2.e.5, CTS 4.8.1.1.2.e.6, CTS 4.8.1.1.2.e.7, and CTS 4.8.1.1.2.f.3) require the DGs to be started. ITS SR 3.8.1.2, SR 3.8.1.8, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, and SR 3.8.1.22 also require the DGs to be started. However, each of the ITS Surveillances include a Note concerning a prelube. ITS SR 3.8.1.2 Note 1 states that all DG starts may be preceded by an engine prelube period and followed by a warmup period prior to loading. The Note to SR 3.8.1.8 and SR 3.8.1.22, Note 1 to SR 3.8.1.12, SR 3.8.1.13, and SR 3.8.1.19, and Note 2 to SR 3.8.1.16 state that all DG starts may be preceded by an engine prelube period. This changes the CTS by adding the Notes to the applicable Surveillance Requirements. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.2 Note 1, SR 3.8.1.8 Note, SR 3.8.1.12 Note 1, SR 3.8.1.13 Note 1, SR 3.8.1.16 Note 2, SR 3.8.1.19 Note 1, SR 3.8.1.22 Note	4.8.1.1.2.a.4, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.f.3)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.6	CTS 4.8.1.1.2.a.5 requires the DG to be synchronized and loaded for ≥ 60 minutes. Footnote ** allows for momentary load transients to not invalidate this test. In addition, the CTS does not place a time limit on loading the DG for this test. ITS SR 3.8.1.3 requires this same test and Footnote ** is incorporated as Note 2 to SR 3.8.1.3. However, SR 3.8.1.3 Note 1 has been added, which states that DG loadings may include gradual loading as recommended by the manufacturer. This changes the CTS by adding an explicit Note that states that DG loadings may include gradual loading as recommended by the manufacturer. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.3 Note 1	4.8.1.1.2.a.5
3.8.1 A.7	CTS 3.0.5 states that it is not applicable in MODE 5 or 6. CTS 3.0.5 has been incorporated into the ACTIONS of ITS 3.8.1. This changes the CTS by incorporating the allowances of CTS 3.0.5 in ITS 3.8.1. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.1 ACTIONS	3.0.5
3.8.1 A.8	CTS 4.8.1.1.2.e.7 requires verification that the DG operates at a power factor of less than or equal to 0.86 for at least 8 hours. Within 5 minutes after completing this test, CTS 4.8.1.1.2.a.4, the normal DG start test, must be performed. CTS 4.8.1.1.2.e.7 footnote ** states that if CTS 4.8.1.1.2.a.4 is not completed satisfactorily, it is not necessary to repeat the 8 hour test. Instead, the DG may be operated at the load required in CTS 4.8.1.1.2.e.7 for 2 hours "or until operating temperature has stabilized." The criteria for performing the normal DG start test within 5 minutes after completing the 8 hour test has been incorporated into ITS SR 3.8.1.16 Note 1. This Note states that the SR must be performed within 5 minutes of shutting down the DG after the DG has operated for ≥ 2 hours within a specified load range. This changes the CTS by deleting the allowance to allow the DG to operate until temperature has stabilized. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.16 Note 1	4.8.1.1.2.e.7 footnote **
3.8.1 A.9	CTS 4.8.1.1.1.b requires the demonstration of the offsite circuits by transferring the unit power source automatically from the normal auxiliary source to the preferred reserve source and by transferring manually to the alternate reserve source. ITS SR 3.8.1.9 requires the same Surveillance, however a Note is added which states that the automatic transfer is only required to be met when the auxiliary source is supplying the onsite electrical power distribution subsystem. This changes the CTS by adding a clarification Note to the Surveillance (Note to ITS SR 3.8.1.9). These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.9 Note	4.8.1.1.1.b
3.8.1 A.10	CTS 4.8.1.1.2.e contains a requirement to perform various tests "during shutdown." These tests have been incorporated in ITS SR 3.8.1.10 through SR 3.8.1.15 and SR 3.8.1.17 through SR 3.8.1.20. These Surveillances include a Note which state that the Surveillance shall not normally be performed in MODE 1 or 2 or MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. In addition, the Note states that credit may be taken for unplanned events that satisfy the SR. This changes the CTS by adding the allowance that credit may be taken for unplanned events that satisfy the associated SR. Additional changes to CTS 4.8.1.1.2.e are discussed in DOC L.8. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.10 Note 1, SR 3.8.1.11 Note 1, SR 3.8.1.12 Note 2, SR 3.8.1.13 Note 2, SR 3.8.1.14 Note, SR 3.8.1.15 Note 2, SR 3.8.1.17 Note, SR 3.8.1.18 Note, SR 3.8.1.19 Note 2, SR 3.8.1.20 Note 2	4.8.1.1.2.e, 4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.9, 4.8.1.1.2.e.10, 4.8.1.1.2.e.11

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 A.11	CTS 4.8.1.1.2.e.6.c) requires the verification that all automatic DG trips, except engine overspeed and generator differential, are automatically bypassed upon loss of voltage on the emergency bus "and/or" Safety Injection actuation signal. ITS SR 3.8.1.14 requires the verification that each DG's automatic trips are bypassed on an actual or simulated loss of voltage signal on the emergency bus "or" an actual or simulated ESF signal. This changes the CTS by clarifying the automatic trips are bypassed either upon loss of voltage on the emergency bus "or" an ESF signal, not both of them concurrently as could be interpreted by use of the "and/or" term. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.14	4.8.1.1.2.e.6.c)
3.8.1 A.12	CTS LCO 3.8.1.1.b.1 requires each DG fuel day tank to contain a minimum volume of 70 gallons of fuel. ITS SR 3.8.1.4 requires each DG fuel day tank to contain ≥ 101.4 gallons of fuel oil. This changes the CTS by clarifying that the amount of fuel oil required to be stored in the DG day tank includes both the usable and unusable volumes. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.1.4	LCO 3.8.1.1.b.1
3.8.1 A.13	CTS 4.8.1.1.2.e.10 requires verifying that with the DG operating in a test mode while connected to its test load, a simulated Safety Injection (SI) signal overrides the test mode by returning the DG to standby operation and ensuring the emergency loads remain powered by offsite power. ITS SR 3.8.1.20 requires a similar test, however a Note (Note 1) is included that states that the Surveillance is only required to be met when the DG is connected to its load test resistor bank. This changes the CTS by adding a specific statement concerning when the Surveillance is required to be met. This change is designated as administrative because it does not result in a technical change to the CTS.	SR 3.8.1.20 Note 1	4.8.1.1.2.e.10
3.8.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.2	3/4.8.1.2
3.8.2 A.2	CTS 3.8.1.2 does not address the situation when an ESF bus is de-energized as a result of the loss of an AC Source to an ESF bus. A Note has been added to the Required Actions for an inoperable offsite circuit (ITS 3.8.2 ACTION A) which requires entry into the applicable Conditions and Required Actions of LCO 3.8.10 when one required train (ESF bus) is de-energized as a result of an inoperable offsite circuit. This changes the CTS by directing entry into LCO 3.8.10. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.2 ACTION A Note	N/A
3.8.2 A.3	CTS 4.8.1.2 allows certain 18 month Surveillance Requirements, commencing in 1999 during the extended shutdown initiated in 1997, to be delayed one time until just prior to the first entry into MODE 4 following the shutdown. ITS 3.8.2 does not include this allowance. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.8.1.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 A.4	CTS 3.8.1.2.a requires one circuit between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE and CTS 3.8.1.2.b requires one DG to be OPERABLE. These two required AC Sources are Unit 2 sources. CTS 3.9.12 requires the Fuel Handling Area Exhaust Ventilation (FHAEV) System (which is powered from Unit 1 AC Sources) to be OPERABLE whenever irradiated fuel is in the storage pool. The CTS definition of "OPERABLE - OPERABILITY" includes both a normal and emergency electrical power source requirement. However, there are no specific requirements in Unit 2 CTS 3.8.1.2 requiring the Unit 1 AC Sources to be OPERABLE to support the FHAEV System. In addition, CTS 3.0.5, which provides compensatory actions when an AC Source is inoperable, is not applicable in MODES 5 and 6. Unit 2 ITS LCO 3.8.2.c requires one Unit 1 qualified circuit between the offsite transmission network and the Unit 1 onsite Class 1E AC electrical power distribution subsystem required by LCO 3.8.10. In addition, Unit 2 ITS 3.8.2 ACTION A also applies to an inoperable Unit 1 AC Source. This changes the Unit 2 CTS by explicitly requiring one Unit 1 offsite circuit to be OPERABLE and powering the Unit 1 equipment required to be OPERABLE, and requires the FHAEV System to be declared inoperable or to suspend movement of irradiated fuel assemblies if the Unit 1 AC Source is inoperable. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.8.2.c (Unit 2 only), 3.8.2 ACTION A (Unit 2 only)	N/A
3.8.2 A.5	CTS LCO 3.8.1.2.b.1 requires a DG fuel day tank to contain a minimum volume of 70 gallons of fuel. ITS SR 3.8.2.1 (which references SR 3.8.1.4) requires a DG fuel day tank to contain ≥ 101.4 gallons of fuel oil. This changes the CTS by clarifying that the amount of fuel oil required to be stored in the DG day tank includes both the usable and unusable volumes. The purpose of CTS LCO 3.8.1.2.b.1 is to ensure the DG has sufficient fuel oil supply to allow the DG to run at full load before one of the fuel oil transfer pumps must be started to replenish the fuel oil supply and ensure uninterrupted DG service. As stated in the CTS Bases, the 70 gallons of fuel required by CTS 3.8.1.2.b.1 is the usable volume. For clarity and for consistency with the fuel oil storage tank volume requirement, the contained volume is provided. Each day tank has 31.4 gallons of unusable volume (taking into account the geometry of the tank and a minimum submergence to suppress vortexing). Therefore, the proposed value of 101.4 gallons ensures 70 gallons of usable fuel oil in the day tank. The change is administrative since the proposed DG fuel oil volume in each day tank will ensure at least 15 minutes of DG operation. This change is administrative because the day tank volume requirements are now explicit in stating the required volume of 101.4 gallons is a contained volume.	SR 3.8.2.1	LCO 3.8.2.1.b.1
3.8.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.3	LCO 3.8.1.1.b.2, 3.8.1.1 Action b, 4.8.1.1.2.a, 4.8.1.1.2.a.2, 4.8.1.1.2.b, 4.8.1.1.2.d footnote *, 4.8.1.1.2.f.1, 4.8.1.1.2.f.2), Table 4.8-1, LCO 3.8.1.2.b.2, 3.8.1.2 Action, 4.8.1.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 A.2	CTS LCOs 3.8.1.1 and 3.8.1.2 state the requirements for the AC Sources during operating and shutdown conditions, respectively. These requirements are used to form the LCO and Applicability for the ITS diesel fuel oil Specification. ITS LCO 3.8.3, "Diesel Fuel Oil," states that the stored diesel fuel oil shall be within limits for each required DG. The Applicability for this requirement is when associated DG is required to be OPERABLE. This changes the CTS by combining the requirements for diesel fuel oil into one Specification. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.8.3	LCO 3.8.1.1.b.2, LCO 3.8.1.2.b.2
3.8.3 A.3	CTS 4.8.1.1.2.b.2 requires the removal of accumulated water from the diesel fuel oil storage tanks at least once per 31 days. CTS 4.8.1.1.2.b footnote *** states that the actions to be taken should any of the properties be found outside of specified limits are defined in the Bases. For CTS 4.8.1.1.2.b.2, the Bases state that the removal of accumulated water as required by CTS 4.8.1.1.2.b.2 is performed by drawing the contents off the bottom of the tank until acceptable results are obtained for either a tape test or a water and sediment test. An acceptable result for the water and sediment content is a measured value less than 0.05 percent volume. ITS SR 3.8.3.3 specifies to check and remove accumulated water from each fuel oil storage tank. ITS 3.8.3 ACTION D states that with one or more DGs with diesel fuel oil not within limits for reasons other than Condition A, B, or C, to immediately declare the associated DG inoperable. ITS 3.8.3 Conditions A, B, and C are not related to accumulated water, therefore, if for some reason accumulated water could not be removed, then ITS 3.8.3 ACTION D would be entered and the associated DG could be declared inoperable. This changes the CTS by providing an ACTION for diesel fuel oil not within limits (in this case, fuel oil accumulated water present). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.3 ACTION D	N/A
3.8.3 A.4	CTS 4.8.1.1.2.c and CTS 4.8.1.1.2.d specify the requirements for the properties of new and stored fuel oil, respectively. The technical content of CTS 4.8.1.1.2.c and CTS 4.8.1.1.2.d is being moved to ITS 5.5.11. A Surveillance Requirement is added (ITS SR 3.8.3.2) to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining OPERABILITY of the DG fuel oil subsystem. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.3.2, 5.5.11	4.8.1.1.2.c, 4.8.1.1.2.d
3.8.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.4	3/4.8.2.3, 3/4.8.2.5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 A.2	CTS 3.8.2.3 only provides requirements for the unit DC Sources; it does not provide any requirements for the opposite unit DC Sources. CTS LCO 3.7.4.1 requires two independent essential service water loops to be OPERABLE. The CTS 3/4.7.4 Bases state that the LCO also ensures that an inoperable opposite unit ESW pump does not result in flow being diverted from an OPERABLE unit ESW pump sharing the same header. Therefore, if the header between the two units is not isolated, both ESW pumps on the same header support both units. The CTS definition of OPERABILITY requires all attendant equipment (including both the normal and emergency electrical power sources) to be capable of performing its required function. Thus, the opposite unit DC Sources may be required to be OPERABLE. In addition, this would require declaring the affected ESW train inoperable when an associated opposite unit DC Source is inoperable. ITS LCO 3.8.4.c requires opposite unit Train A and Train B 250 VDC electrical power subsystems capable of supplying the opposite unit Essential Service Water (ESW) components required by LCO 3.7.8, "Essential Service Water (ESW) System," to be OPERABLE. ITS 3.8.4 ACTION E has been added and covers the situation when a required opposite unit Train A or Train B or both electrical power subsystems are inoperable. ITS 3.8.4 ACTION E requires the immediate declaration that the associated ESW train(s) are inoperable. This changes the CTS by providing an explicit LCO and ACTION for the opposite unit Train A and B 250 VDC Sources. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.8.4.c, 3.8.4 ACTION E	N/A
3.8.4 A.3	CTS 4.8.2.3.2.d requires the performance of a battery service test on the Train A and Train B batteries. CTS 4.8.2.5.2.d requires the performance of a battery service test on the Train N battery. These tests must be performed during shutdown (MODES 5 or 6). ITS SR 3.8.4.3 requires the verification that the battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. Note 2 to ITS SR 3.8.4.3 specifies that this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. In addition, Note 2 states that credit may be taken for unplanned events that satisfy this SR. This changes the CTS by adding the allowance that credit may be taken for unplanned events that satisfy the associated SR. Additional changes to CTS 4.8.2.3.2.d and CTS 4.8.2.5.2.d are discussed in DOC L.4. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.4.3 Note 2	4.8.2.3.2.d, 4.8.2.5.2.d
3.8.4 A.4	CTS 3.8.2.5 Action states that with the Train N 250 VDC battery and/or its charger inoperable, to declare the turbine driven auxiliary feedwater pump inoperable "and follow the Action statement of Specification 3.7.1.2." ITS 3.8.4 ACTION D covers the situation when the Train N 250 VDC electrical power subsystem is inoperable. ITS 3.8.4 Required Action D.1 is to immediately declare the turbine driven auxiliary feedwater train inoperable. This changes the CTS by deleting the detail to follow the Action statement of Specification 3.7.1.2. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.4 ACTION E	3.8.2.5 Action
3.8.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.5	3/4.8.2.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.5 A.2	CTS 3.8.2.4 (Unit 1) is applicable during MODES 5 and 6, and during the movement of irradiated fuel. CTS 3.8.2.4 (Unit 2) is applicable only during MODES 5 and 6, however CTS 3.8.2.4 Action a (Unit 2) requires movement of irradiated fuel assemblies to be suspended if the required DC electrical equipment is inoperable. ITS 3.8.5 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 (Unit 1) and Unit 1 (Unit 2) containment. Also, a Note is added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Note to the ACTIONS stating that LCO 3.0.3 is not applicable. The change to the Unit 1 Applicability is discussed in DOC A.4 and the change to the Unit 2 Applicability is discussed in DOC A.3. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.5 ACTIONS Note	N/A
3.8.5 A.3	Unit 2 CTS 3.8.2.4 is applicable during MODES 5 and 6. However, CTS 3.8.2.4 Action a requires movement of irradiated fuel assemblies to be suspended if the required DC electrical equipment is inoperable. Unit 2 ITS 3.8.5 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. This changes the Unit 2 CTS by adding the explicit Applicability of during movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 2 3.8.5 Applicability	3.8.2.4 Applicability (Unit 2 only)
3.8.5 A.4	Unit 1 CTS 3.8.2.4 Applicability includes "during movement of irradiated fuel." Unit 1 ITS 3.8.5 Applicability includes "During movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 containment." This changes the Unit 1 CTS by clarifying the locations that fuel movement is taking place. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 1 3.8.5 Applicability	3.8.2.4 Applicability (Unit 1 only)
3.8.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.6	4.8.2.3.2.a, 4.8.2.3.2.b, 4.8.2.3.2.e, 4.8.2.4.2, 4.8.2.5.2.a, 4.8.2.5.2.b, 4.8.2.5.2.e
3.8.6 A.2	CTS 3.8.2.3 is applicable during MODES 1, 2, 3, and 4. CTS 3.8.2.4 (Unit 1) is applicable during MODES 5 and 6 and during movement of irradiated fuel. CTS 3.8.2.4 (Unit 2) is applicable during MODES 5 and 6. CTS 3.8.2.5 is applicable during MODES 1, 2, and 3. ITS LCO 3.8.6 requires the battery parameters for the Trains A, B, and N 250 VDC batteries, and opposite unit Trains A and B 250 VDC batteries to be within limits. ITS 3.8.6, which only covers the requirements for battery parameters, is applicable when the associated DC electrical power subsystems are required to be OPERABLE. This changes the CTS by combining the requirements for the Train A, B, and N 250 VDC battery parameters into one Specification and replacing the actual MODES with the phrase "When associated DC electrical power subsystems are required to be OPERABLE." These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.6	3.8.2.3, 3.8.2.4, 3.8.2.5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 A.3	CTS 4.8.2.3.2.e requires the performance test of battery capacity on the Trains A and B 250 VDC batteries. CTS 4.8.2.5.2.e requires the performance test of battery capacity on the Train N 250 VDC battery. These tests must be performed during shutdown (MODES 5 or 6). ITS SR 3.8.6.6 requires the same test, but a Note to SR 3.8.6.6 specifies that this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. In addition, the Note states that credit may be taken for unplanned events that satisfy this SR. This changes the CTS by adding the allowance that credit may be taken for unplanned events that satisfy the associated SR. Additional changes to CTS 4.8.2.3.2.e and CTS 4.8.2.5.2.e are discussed in DOC L.6. These changes are administrative changes because they do not result in technical changes to the CTS.	SR 3.8.6.6 Note	4.8.2.3.2.e, 4.8.2.5.2.e
3.8.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.7	3/4.8.2.1
3.8.8 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.8	3/4.8.2.2
3.8.8 A.2	Unit 1 CTS 3.8.2.2 is applicable during MODES 5 and 6, and during the movement of irradiated fuel. Unit 2 CTS 3.8.2.2 is applicable during MODES 5 and 6. ITS 3.8.8 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 (Unit 1) and Unit 1 (Unit 2) containment. However, a Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Note to the ACTIONS stating that LCO 3.0.3 is not applicable. The change in the Applicability is discussed in DOCs A.3 and A.4. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.8 ACTIONS Note	N/A
3.8.8 A.3	Unit 2 CTS 3.8.2.2 is applicable during MODES 5 and 6. However, CTS 3.8.2.2 Action a requires movement of irradiated fuel assemblies to be suspended if the required inverter(s) are inoperable. Unit 2 ITS 3.8.8 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. This changes the Unit 2 CTS by adding the explicit Applicability of during movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 2 3.8.8 Applicability	3.8.2.2 Applicability (Unit 2 only)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.8 A.4	Unit 1 CTS 3.8.2.2 Applicability includes "during movement of irradiated fuel." Unit 1 ITS 3.8.8 Applicability includes "During movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 containment." This changes the Unit 1 CTS by clarifying the locations that fuel movement is taking place. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 1 3.8.8 Applicability	3.8.2.2 Applicability (Unit 1 only)
3.8.9 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.9	3/4.8.2.1, 3/4.8.2.3, 3/4.8.2.5
3.8.9 A.2	CTS 3.8.2.1 only provides the requirements for the unit AC electrical power distribution subsystems. CTS 3.8.2.3 only provides the requirements for the unit DC electrical power distribution subsystems. Neither of these Specifications provide any requirements for the opposite unit electrical power distribution subsystems. CTS LCO 3.7.4.1 requires two independent essential service water loops to be OPERABLE. The CTS 3/4.7.4 Bases states that the LCO also ensures that an inoperable opposite unit ESW pump does not result in flow being diverted from an OPERABLE unit ESW pump sharing the same header. Therefore, if the header between the two units is not isolated, both ESW pumps on the same header support both units. The CTS definition of OPERABLE-OPERABILITY requires all attendant equipment to be capable of performing its required function which includes necessary electrical power distribution requirements. Thus, the opposite unit electrical power distribution subsystems may be required to be OPERABLE. In addition, this would require declaring the affected ESW train inoperable when a required opposite unit bus is inoperable. ITS LCO 3.8.9.e requires the Unit 2 (Unit 1) and Unit 1 (Unit 2) Train A and Train B AC electrical power distribution subsystem(s) and the Train A and Train B 250 VDC electrical power distribution subsystem(s) required to support the equipment required to be OPERABLE by LCO 3.7.8, "Essential Service Water (ESW) System," to be OPERABLE. ITS 3.8.9 ACTION F has been added to cover the situation when LCO 3.8.9.e is not met. ITS 3.8.9 ACTION F requires the immediate declaration that the associated ESW train(s) are inoperable. This changes the CTS by providing an explicit LCO and ACTION for the opposite unit electrical power distribution subsystems. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.8.9.3, 3.8.9 ACTION F	N/A
3.8.9 A.3	CTS 3.8.2.1 Action states that with less than the above complement of AC buses OPERABLE, to restore the inoperable bus to OPERABLE status within 8 hours. ITS 3.8.9 Required Action A.1 allows 8 hours to restore the Train A and Train B AC electrical power distribution subsystem(s) to OPERABLE status. In addition, a Note has been added (ITS 3.8.9, Note to ACTION A) that requires entry into applicable Conditions and Required Action of LCO 3.8.4, "DC Sources – Operating," for DC Sources made inoperable by inoperable power distribution subsystems. This changes the CTS by requiring the compensatory actions for DC Sources to be taken if a DC Source is made inoperable by inoperable power distribution subsystems. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.9 ACTION A Note	N/A

Table A - Administrative Changes
ITS Section 3.8 – Electrical Power Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 A.4	The CTS 3.8.2.5 Action states that with the Train N 250 VDC battery and/or its charger inoperable, to declare the turbine driven auxiliary feedwater pump inoperable "and follow the Action statement of Specification 3.7.1.2." ITS 3.8.9 ACTION E covers the situation when the Train N 250 VDC electrical power distribution subsystem is inoperable. ITS 3.8.9 Required Action E.1 is to declare the turbine driven auxiliary feedwater train inoperable. This changes the CTS by deleting the detail to follow the Action statement of Specification 3.7.1.2. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.9 ACTION E	3.8.2.5 Action
3.8.10 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.10	3/4.8.2.2, 3/4.8.2.4
3.8.10 A.2	Unit 1 CTS 3.8.2.2 and CTS 3.8.2.4 are applicable during MODES 5 and 6, and during the movement of irradiated fuel. Unit 2 CTS 3.8.2.2 and CTS 3.8.2.4 are applicable during MODES 5 and 6. ITS 3.8.10 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 (Unit 1) and Unit 1 (Unit 2) containment. However, a Note has been added to the ACTIONS which states that LCO 3.0.3 is not applicable. This changes the CTS by adding the Note to the ACTIONS stating that LCO 3.0.3 is not applicable. These changes are administrative changes because they do not result in technical changes to the CTS.	3.8.10 ACTIONS Note	N/A
3.8.10 A.3	Unit 2 CTS 3.8.2.2 only provides the requirements for the unit AC electrical power distribution subsystems. The Specification does not provide any requirements for the Unit 1 AC electrical power distribution subsystems. CTS 3.9.12 requires the Fuel Handling Area Exhaust Ventilation (FHAEV) System to be OPERABLE whenever irradiated fuel is in the storage pool. The CTS definition of OPERABLE – OPERABILITY requires all attendant equipment to be capable of performing its required function, and includes necessary electrical power distribution requirements. Thus, a Unit 1 AC electrical power distribution subsystem may be required to be OPERABLE. In addition, this would require declaring the FHAEV System inoperable when a required Unit 1 bus is inoperable. Unit 2 ITS LCO 3.8.10 requires a Unit 1 electrical power distribution subsystem to be OPERABLE to support equipment required to be OPERABLE. ITS 3.8.10 ACTION B has been added to immediately declare associated Fuel Handling Area Exhaust Ventilation (FHAEV) System inoperable when a required Unit 1 AC electrical power distribution subsystem is inoperable. This changes the Unit 2 CTS by providing an explicit LCO and ACTION for the Unit 1 AC electrical power distribution subsystem. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 2 LCO 3.8.10, Unit 2 3.8.10 ACTION B	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 A.4	Unit 2 CTS 3.8.2.2 and Unit 2 CTS 3.8.2.4 are applicable during MODES 5 and 6. However, the CTS 3.8.2.2 Action and CTS 3.8.2.4 Action require movement of irradiated fuel assemblies to be suspended if the required AC or DC electrical equipment is inoperable. Unit 2 ITS 3.8.10 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. This changes the Unit 2 CTS by adding the explicit Applicability of during movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 1 containment. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 2 3.8.10 Applicability	3.8.2.2 Applicability (Unit 2 only), 3.8.2.4 Applicability (Unit 2 only)
3.8.10 A.5	Unit 1 CTS 3.8.2.2 Applicability and Unit 1 CTS 3.8.2.4 Applicability include "during movement of irradiated fuel." Unit 1 ITS 3.8.10 Applicability includes "During movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 containment." This changes the Unit 1 CTS by clarifying the locations that fuel movement is taking place. These changes are administrative changes because they do not result in technical changes to the CTS.	Unit 1 3.8.10 Applicability	3.8.2.2 Applicability (Unit 1 only), 3.8.2.4 Applicability (Unit 1 only)

Table A - Administrative Changes
ITS Section 3.9 – Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.1	3/4.9.1
3.9.1 A.2	CTS 3.9.1 provides requirements on the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal. ITS 3.9.1 provides requirements on the boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity. This changes the CTS by explicitly including the refueling cavity in the volumes required to have boron concentration maintained. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.9.1	LCO 3.9.1
3.9.1 A.3	CTS 3.9.1 Action b contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.1 does not contain an equivalent statement. This changes the CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.1 Action b
3.9.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.2	3/4.9.2
3.9.2 A.2	CTS 3.9.2 Action b contains the statement, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.2 does not contain an equivalent statement. This changes the CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.2 Action b
3.9.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.3	3/4.9.4, 4.6.3.1.2.c, 3/4.9.9

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.3 A.2	CTS 3.9.4.b requires a minimum of one door in each airlock to be closed or allows both airlock doors to be open provided one door in each airlock is OPERABLE, refueling cavity level is greater than 23 feet above the fuel, and a designated individual is available at all times to close the airlock if required. A footnote associated with CTS 3.9.4.b clarifies that for the purpose of this Specification, an OPERABLE air lock door is a door that is capable of being closed and secured. ITS 3.9.3 requires that one door in each air lock is capable of being closed. This changes the CTS by replacing the prescriptive requirements for control of the air lock doors with a more general requirement that the air lock doors must be capable of being closed. Other aspects of this change are discussed in DOC A.3 and DOC LA.1. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.9.3	LCO 3.9.4.b (including footnote *)
3.9.3 A.3	CTS 3.9.4.b.2.b allows both airlock doors to be open provided, in part, that the refueling cavity level is greater than 23 feet above the fuel. ITS 3.9.3 does not contain this restriction. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.9.6	3.9.4.b.2.b
3.9.3 A.4	The CTS 3.9.4 and CTS 3.9.9 Actions state "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.3 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.4 Action, 3.9.9 Action
3.9.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.4	3/4.9.8.1
3.9.4 A.2	CTS 3.9.8.1 requires at least one residual heat removal loop to be in operation in MODE 6. ITS 3.9.4 requires one RHR loop to be OPERABLE and in operation in MODE 6 with the water level greater than or equal to 23 feet above the top of the reactor vessel flange. However, ITS 3.9.5 covers the Applicability of MODE 6 with water level less than 23 feet above the top of the reactor vessel flange. This changes the CTS by splitting the requirements associated with CTS 3.9.8.1 into two Applicabilities, one for MODE 6 with water level < 23 feet above the top of the reactor vessel flange, and one for MODE 6 with water level greater than of equal to 23 feet above the reactor vessel flange. These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.4, 3.9.5	3/4.9.8.1
3.9.4 A.3	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load of the Reactor Coolant System. ITS 3.9.4 Required Action A.2 states, in part, that with the RHR loop requirements not met, suspend loading irradiated fuel assemblies in the core. This changes the CTS by requiring that the loading of irradiated fuel assemblies be suspended instead of requiring that all operations involving an increase in the reactor decay heat load be suspended. These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.4 Required Action A.2	3.9.8.1 Action a

Table A - Administrative Changes
ITS Section 3.9 – Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 A.4	CTS 3.9.8.1 Action c states "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.4 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.8.1 Action c
3.9.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.5	3/4.9.8.1, 3/4.9.8.2
3.9.5 A.2	CTS 3.9.8.1 requires at least one residual heat removal loop to be in operation in MODE 6. ITS 3.9.5 requires two RHR loops to be OPERABLE and one RHR loop to be in operation in MODE 6 with the water level less than 23 feet above the top of the reactor vessel flange. However, ITS 3.9.4 covers the Applicability of MODE 6 with water level greater than or equal to 23 feet above the top of the reactor vessel flange. This changes the CTS by splitting the requirements associated with CTS 3.9.8.1 into two Applicabilities, one for MODE 6 with water level < 23 feet above the top of the reactor vessel flange, and one for MODE 6 with water level ≥ 23 feet above the reactor vessel flange. These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.4, 3.9.5	3/4.9.8.1
3.9.5 A.3	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, suspend all operations involving an increase in the reactor decay heat load of the Reactor Coolant System. ITS 3.9.5 does not include this requirement. This changes the CTS by eliminating the requirement to suspend operations involving an increase in reactor decay heat load. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.9.6	3.9.8.1 Action a
3.9.5 A.4	CTS 3.9.8.1 Action c and CTS 3.9.8.2 Action c state, "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.5 does not include this statement. This changes CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.8.1 Action c, 3.9.8.2 Action c
3.9.5 A.5	CTS 3.9.8.2 LCO is modified by footnote *, which states that the normal or emergency power source may be inoperable for each RHR loop. ITS 3.9.5 does not include this statement. This changes the CTS by deleting an allowance already provided in a different portion of the ITS. These changes are administrative changes because they do not result in technical changes to the CTS.	Definition of OPERABLE-OPERABILITY	LCO 3.9.8.2 footnote *
3.9.5 A.6	CTS 3.9.8.2 Action a states that with less than the required RHR loops OPERABLE, immediately initiate corrective action to return the required RHR loops to OPERABLE status as soon as possible. ITS 3.9.5 ACTION A includes the same requirement, but also includes an allowance (Required Action A.2) to immediately initiate action to establish ≥ 23 feet of water above the top of reactor vessel flange. This changes the CTS by providing the option to exit the Applicability of the LCO. These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.5 Required Action A.2	N/A

Table A - Administrative Changes
ITS Section 3.9 – Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.6	3/4.9.10
3.9.6 A.2	CTS 3.9.10 is applicable in MODE 6 during movement of fuel assemblies or control rods within the reactor pressure vessel. ITS 3.9.6 is applicable during movement of irradiated fuel assemblies within containment. This changes the CTS by eliminating the "MODE 6" portion of the Applicability. The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L.1. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M.1. The change eliminating control rods is discussed in DOC L.2. These changes are administrative changes because they do not result in technical changes to the CTS.	3.9.6 Applicability	3.9.10 Applicability
3.9.6 A.3	The CTS 3.9.10 Action states "The provisions of Specification 3.0.3 are not applicable." ITS 3.9.6 does not include this statement. This changes the CTS by deleting the Specification 3.0.3 exception. These changes are administrative changes because they do not result in technical changes to the CTS.	LCO 3.0.3	3.9.10 Action

Table A - Administrative Changes
ITS Chapter 4.0 - Design Features

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
4.0 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	4.0	5.0
4.0 A.2	CTS 5.1.2 states "The low population zone shall be as shown in Figure 5.1-2." CTS Figure 5.1-2 provides a map depicting the low population zone. ITS 4.1.2 provides a description of the low population zone; a figure is not provided. This changes the CTS by providing a word description of the low population zone instead of a map. These changes are administrative changes because they do not result in technical changes to the CTS.	4.1.2	5.1.1, Figure 5.1-2
4.0 A.3	CTS Figures 5.6-1 and 5.6-2 provide drawings that depict the various regions of the spent fuel storage pool racks for a normal storage pattern (mixed three zone) and for an interim storage pattern (checkerboard). The key at the bottom of the figures identifies the total number of cells for the various regions. The CTS Figure 5.6-1 key identifies, in part, that there are 1415 Region 2 cells and 1694 Region 3 cells, and the CTS Figure 5.6-2 key identifies, in part, that there are 1415 Region 2 cells and 1379 Region 3 cells. The ITS Figure 4.3-1 key identifies that there are 1439 Region 2 cells and 1670 Region 3 cells, and the ITS Figure 4.3-2 key identifies that there are 1439 Region 2 cells and 1355 Region 3 cells. This changes the keys to clearly identify the actual number of cells depicted in each region.	Figures 4.3-1 and 4.3-2	Figures 5.6-1 and 5.6-2

Table A - Administrative Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.1 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.1	6.1
5.1 A.2	CTS 6.1.2 requires a management directive regarding delegation of the control room command function to be signed by the Site Vice President and issued to all station personnel on an annual basis. ITS 5.1.2 does not include this requirement. This changes the CTS by deleting the requirement to issue this management directive annually. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.1.2
5.2 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.2	6.2, 6.3.1
5.2 A.2	CTS 6.2.1.a states, in part, "These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e)." The ITS does not include the requirement associated with updating the UFSAR in accordance with 10 CFR 50.71(e). This changes the CTS by deleting these requirements for updating the UFSAR. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.2.1.a
5.2 A.3	CTS 6.2.2.b states "At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in Mode 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room." CTS 6.2.2.d requires all CORE ALTERATIONS to be directly supervised by a licensed Senior Operator trained or qualified in refueling and CORE ALTERATIONS who has no other concurrent responsibilities during this operation. The ITS does not include these requirements. This changes the CTS by deleting these requirements. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.2.2.b, 6.2.2.d
5.2 A.4	CTS 6.3.1 provides, in part, qualification requirements for the Shift Technical Advisor (STA), and requires the STA to have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents. ITS 5.2.2.f requires this individual to meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift. This changes the CTS by referencing the Commission Policy Statement on Engineering Expertise on Shift for qualification requirements instead of listing the specific qualification requirements. These changes are administrative changes because they do not result in technical changes to the CTS.	5.2.2.f	6.3.1

Table A - Administrative Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.3 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.3	6.3
5.3 A.2	ITS 5.3.2 states "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m)." The CTS does not include such a statement. This changes the CTS by clarifying that these individuals must meet all of the qualification requirements referenced in 10 CFR 55.4, ITS 5.3.1, and 10 CFR 50.54(m). These changes are administrative changes because they do not result in technical changes to the CTS.	5.3.2	N/A
5.4 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.4	6.8
5.4 A.2	CTS 6.8.1.e requires procedures for implementation of the OFFSITE DOSE CALCULATION MANUAL (ODCM) and CTS 6.8.1.g requires procedures for the implementation of the Component Cyclic or Transient Limits Program. ITS 5.4.1 requires procedures for various activities, but does not specifically list the ODCM and the Component Cyclic or Transient Limits Program. This changes the CTS by removing the explicit requirements for written procedures for implementation of the ODCM and the Component Cyclic or Transient Limits Program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.4.1	6.8.1.e, 6.8.1.g

Table A - Administrative Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.5	6.8.4, License Conditions 2.C.(7), 2.H, and 2.I (Unit 1) and 2.C.(3)(v), 2.G, and 2.H (Unit 2), 1.30, 4.0.5, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, Tables 4.4-1 and 4.4-2, 4.4.10.1, 3/4.6.1.2, 3.6.1.3.b, 4.6.1.3.a, 4.7.5.1.c, 4.7.5.1.d, 4.7.5.1.e.1, 4.7.5.1.f, 4.7.5.1.g, 4.7.6.1.b, 4.7.6.1.c, 4.7.6.1.d.1, 4.7.6.1.e, 4.7.6.1.f, 4.8.1.1.2.c, 4.8.1.1.2.d, 4.9.12.b, 4.9.12.c, 4.9.12.d.1, 4.9.12.e, 4.9.12.f, 3/4.11.1, 3/4.11.2.1, 3/4.11.2.2, 6.8.1.g, 6.14
5.5 A.2	CTS 6.8.4.a specifies the requirements for the Radioactive Effluent Controls Program, however there is no statement as to whether or not the provisions of CTS 4.0.2 and CTS 4.0.3 are applicable. ITS 5.5.3 states that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies. This changes the CTS by adding the allowances of ITS SR 3.0.2 and SR 3.0.3 to the Radioactive Effluent Controls Program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.3	N/A
5.5 A.3	CTS 4.0.5.b does not include all of the required Surveillance Frequencies for performing inservice testing activities. ITS 5.5.6.a adds a new required Frequency of "Biennially or every 2 years." This changes the CTS by adding a new Frequency to the required Frequencies for performing inservice testing activities. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.6.a	4.0.5.b
5.5 A.4	CTS 4.0.5.d states that the performance of the above testing activities shall be in addition to other specified Surveillance Requirements. ITS 5.5.6 does not include a similar statement. This changes the CTS by deleting the statement. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	4.0.5.d
5.5 A.5	CTS 4.0.5 specifies the requirements for the Inservice Testing Program, however there is no statement whether the provisions of CTS 4.0.3 are applicable. ITS 5.5.6.c states that the provisions of SR 3.0.3 are applicable to the inservice testing activities. This changes the CTS by adding the allowances of ITS SR 3.0.3 to the Technical Specification Inservice Testing Program requirements. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.6.c	4.0.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A.6	CTS 4.4.5.1, 4.4.5.2, 4.4.5.3, and 4.4.5.4, including Table 4.4-1 and 4.4-2, specify the requirements for the steam generator tube surveillance testing activities. In the ITS, these requirements are included as ITS 5.5.7, "Steam Generator (SG) Program," and a generic statement describing the program has been included. In addition, a statement has been added which states that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Steam Generator Program test Frequencies. This changes the CTS by adding a generic description of the program and specifically stating that the allowances of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Steam Generator Program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.7	4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, Table 4.4-1 and 4.4-2, 4.0.2, 4.0.3
5.5 A.7	CTS 4.6.1.2 requires the performance of containment leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.1.63, dated September 1995. CTS 4.6.1.2 is also modified by two exceptions. CTS 4.6.1.2.b states that the requirements of Specification 4.0.2 are not applicable. CTS 4.6.1.3.a contains a requirement to perform air lock testing in accordance with 10 CFR 50 Appendix J Option B and Regulatory Guide 1.163, dated September 1995. ITS 5.5.14.a requires a program to establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September, 1995, as modified by the listed exceptions. ITS 5.5.14.e states that the provision of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program. This changes the CTS by including the requirements of CTS 4.6.1.2 and 4.6.1.3 in a program, adding the statement that the provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program, and deleting the statement that the provisions of Specification 4.0.2 are not applicable. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.14.a, 5.5.14.e	4.6.1.2, 4.6.1.3, 4.0.3
5.5 A.8	CTS 4.7.5.1.c, 4.7.6.1.b, and 4.9.12.b require the performance of ventilation filter testing "following painting, fire, or chemical release in any ventilation zone communicating with the system." ITS 5.5.9 requires the performance of the same ventilation filter testing "following painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation that could adversely affect the filter bank or charcoal adsorber capability." This changes the CTS by requiring the filter testing to be performed only if the associated system was in operation and the painting, fire, or chemical release is considered significant enough to adversely affect the filter bank or charcoal adsorber capability. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.9	4.7.5.1.c, 4.7.6.1.b, 4.9.12.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A.9	The Surveillances (CTS 4.7.5.1.c, 4.7.5.1.d, 4.7.5.1.e.1, 4.7.5.1.f, and 4.7.5.1.g) associated with the ventilation filter testing for the Control Room Emergency Ventilation (CREV) System, the Surveillances (CTS 4.7.6.1.b, 4.7.6.1.c, 4.7.6.1.d.1, 4.7.6.1.e, and 4.7.6.1.f) associated with the ventilation filter testing for the Engineered Safety Features (ESF) Ventilation System, and the Surveillances (CTS 4.9.12.b, 4.9.12.c, 4.9.12.d.1, 4.9.12.e, and 4.9.12.f) associated with the filter testing for the Fuel Handling Area Exhaust Ventilation (FHAEV) System have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.9). As such, a general program statement has been added as ITS 5.5.9. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension do apply. This changes the CTS by moving the ventilation filter testing Surveillances associated with the CREV, ESF Ventilation, and FHAEV Systems to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.9	4.7.5.1.c, 4.7.5.1.d, 4.7.5.1.e.1, 4.7.5.1.f, 4.7.5.1.g, 4.7.6.1.b, 4.7.6.1.d.1, 4.7.6.1.e, 4.7.6.1.f, 4.9.12.b, 4.9.12.c, 4.9.12.d.1, 4.9.12.e, and 4.9.12.f, 4.0.2, 4.0.3
5.5 A.10	The Surveillances associated with diesel fuel oil testing (CTS 4.8.1.1.2.c and d) have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.11). As such, a general program statement has been added as ITS 5.5.11. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension do apply. This changes the CTS by moving the diesel fuel oil testing Surveillances to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.11	4.8.1.1.2.c, 4.8.1.1.2.d, 4.0.2, 4.0.3
5.5 A.11	The liquid holdup tank requirements in CTS 3/4.11.1, the explosive gas mixture requirements in CTS 3/4.11.2.1, and the gas storage tank requirements in CTS 3/4.11.2.2 have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.10). As such, a general program statement has been added. Also, a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extensions do apply. This changes the CTS by moving the liquid holdup tank, explosive gas mixture, and gas storage tank requirements to a program in ITS 5.5.10 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.10	3/4.11.1, 3/4.11.2.1, 3/4.11.2.2, 4.0.2, 4.0.3
5.5 A.12	CTS 6.8.1.g requires written procedures to be established, implemented and maintained covering the activities of the component cyclic or transient limits program, which provides controls to track the UFSAR Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits. ITS 5.5.4 requires a program to track the UFSAR, Section 4.1 cyclic and transient occurrences to ensure that components are maintained within the design limits. This changes the CTS by placing the requirements of the Component Cyclic or Transient Limits Program currently located in the procedure section of the CTS Administration Controls Chapter into the Program section of the ITS Administrative Controls Chapter. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.4	6.8.1.g

Table A - Administrative Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 A.13	CTS 4.4.10.1 requires the inspection of each reactor coolant pump flywheel. ITS 5.5.5 requires a program to provide for the inspection of each reactor coolant pump flywheel. In addition, a statement has been added which states the provisions of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency. This changes the CTS by including the requirements of CTS 4.4.10.1 in a program in the Administrative Controls Chapter of the Technical Specifications instead of as a Surveillance and specifically stating that the allowances of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency. Other changes to 3/4.4.10.1 is discussed in the Discussion of Changes for CTS 3/4.4.10.1. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.5	4.4.10.1, 4.0.2, 4.0.3
5.5 A.14	CTS 4.4.5.4.a does not contain a definition for Preservice Inspection. ITS 5.5.7.d.1.i) includes the definition. This changes the Unit 1 CTS by adding a definition for Preservice Inspection. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.7.d.1.i)	4.4.5.4.a (Unit 1 only)
5.5 A.15	CTS 4.0.5 requires pump and valve testing per the requirements of Section XI of the ASME Boiler and Pressure Vessel Code. ITS 5.5.6 requires pump and valve testing per the requirements of the ASME Operation and Maintenance Standards and Guides (OM Codes). This changes the CTS by referring to the ASME OM Codes instead of ASME Boiler and Pressure Code, Section XI. These changes are administrative changes because they do not result in technical changes to the CTS.	5.5.6	4.0.5
5.6 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.6	6.9, Table 3.3-6 Action 22A.2, 4.4.5.5
5.6 A.2	CTS 6.9.1 requires, in addition to the requirements of 10 CFR, reports be submitted to the Regional Administrator. ITS 5.6 requires that the reports be submitted in accordance with 10 CFR 50.4. This changes the CTS by removing the explicit requirement to send reports to the Regional Administrator. These changes are administrative changes because they do not result in technical changes to the CTS.	5.6	6.9.1
5.6 A.3	CTS 6.9.1.4 regarding annual reports requires the initial report to be submitted prior to March 1 of the year following initial criticality. The ITS does not include such a statement. This changes the CTS by deleting a requirement for report submissions that have already occurred and will not be repeated. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.9.1.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.6 A.4	CTS 6.9.1.8 requires the Monthly Reactor Operating Report be submitted to the U.S. Nuclear Regulatory Commission with a copy to the Regional Office. CTS 6.9.1.9.4 requires the CORE OPERATING LIMITS REPORT (COLR) to be provided to the NRC document control desk with copies to the Regional Administrator and Resident Inspector. ITS 5.6.4 requires the Monthly Operating Report to be submitted and ITS 5.6.5.d requires the COLR to be provided to the NRC. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC. These changes are administrative changes because they do not result in technical changes to the CTS.	5.6.4, 5.6.4.d	6.9.1.8, 6.9.1.9.4
5.6 A.5	CTS 6.9.1.9.1 requires, in part, that core operating limits be established and documented in the COLR for the rod drop time limits in CTS 3/4.1.3.3. ITS 5.6.5.a does not include a reference to rod drop time limits. This changes the CTS eliminating the reference to rod drop time limits being core operating limits that are included in the COLR. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.9.1.9.1
5.6 A.6	CTS 6.9.1.9.1 contains a list of the core operating limits established and documented in the COLR and CTS 6.9.1.9.2 contains a list of the locations for the analytical methods used to determine the core operating limits. ITS 5.6.5.a includes additional core operating limits established and documented in the COLR. These are Reactor Core Safety Limits; SHUTDOWN MARGIN; Reactor Trip System Instrumentation Functions 6 and 7 (Overtemperature ΔT and Overpressure ΔT; respectively) Allowable Value parameter values; RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling Limits; and Boron Concentration. These limits had previously been addressed in other parts of the CTS, but are being moved to the COLR in the ITS, and because of this are listed in ITS 5.6.5.a. ITS 5.6.5.b.6 includes the document describing the analytical methods for the Overtemperature ΔT and Overpower ΔT Allowable Value parameter values. This changes the CTS by adding core operating limits established and documented in the COLR (and applicable methodology) because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed in the Discussion of Changes for the respective individual ITS Specifications. These changes are administrative changes because they do not result in technical changes to the CTS.	5.6.5.a, 5.6.5.b	6.9.1.9.1, 6.9.1.9.2
5.6 A.7	CTS 6.9.2 requires special reports be submitted to the NRC and lists the CTS Specifications that require special reports to be submitted. The ITS does not require these special reports to be prepared and submitted. This changes the CTS by deleting the references to the CTS Specifications requiring special reports. Justification for disposition of each of the special report requirements is addressed by the Discussion of Changes for the respective ITS or CTS Specification. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.9.2
5.6 A.8	CTS 4.4.5.5.b requires the complete results of the steam generator tube inservice inspection to be included in the Annual Operating Report. ITS 5.6.7 requires these same results to be submitted on an annual basis (i.e., prior to March 1 for the inspection that was completed in the previous calendar year). This changes the CTS by eliminating the requirement to include the steam generator tube inservice inspection results in the Annual Operating Report. These changes are administrative changes because they do not result in technical changes to the CTS.	5.6.7	4.4.5.5.b

Table A - Administrative Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.6 A.9	CTS 6.9.1.6 and 6.9.1.7 Footnote 3 states that, for these reports, the submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit. ITS 5.6.2 and 5.6.3 does not include the portion of the statement concerning units with separate radwaste systems. This changes the CTS by deleting the reference to units with separate radwaste systems. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.9.1.6 footnote 3, 6.9.1.7 footnote 3
5.6 A.10	CTS 4.4.5.5.c requires a prompt notification to the NRC pursuant to CTS 6.9.1 prior to resumption of plant operation and a followup written report if the results of the steam generator tube inspection fall into the Category C-3. ITS 5.6.7.c requires Category C-3 results to be reported to the NRC in accordance with 10 CFR 50.72 and a Licensee Event Report to be submitted in accordance with 10 CFR 50.73. This changes the CTS by explicitly referencing the applicable Regulations that require the report. These changes are administrative changes because they do not result in technical changes to the CTS.	5.6.7.c	4.4.5.5.c
5.7 A.1	In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (STS). These changes are administrative changes because they do not result in technical changes to the CTS.	5.7	6.12
6.0 A.1	CTS 6.6.1, Reportable Event Action, including CTS 6.6.1.a, specifies, in the case of a Reportable Event, that the Commission be notified and a report be submitted pursuant to the requirements of 10 CFR 50.73. The requirements of CTS 6.6.1 and 6.6.1.a are not included in the ITS. This changes the CTS by removing the requirements for Reportable Event Action. These changes are administrative changes because they do not result in technical changes to the CTS.	N/A	6.6.1, 6.6.1.a

Attachment 3 to AEP:NRC:5901-01

REPLACEMENT PAGES FOR
DRAFT SAFETY EVALUATION ATTACHMENT 3,
TABLE M - MORE RESTRICTIVE CHANGES

ATTACHMENT 3

Table M - More Restrictive Changes

Table M - More Restrictive Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
NONE	NONE	NONE	NONE

Table M - More Restrictive Changes
ITS Chapter 2.0 – Safety Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
NONE	NONE	NONE	NONE

Table M - More Restrictive Changes
ITS Section 3.0 – LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.0 M.1	CTS 4.0.2 states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding "For Frequencies specified as 'once,' the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A.12 and DOC L.3.	SR 3.0.2	4.0.2

Table M - More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.1 M.1	CTS 4.1.1.1.1.e requires SDM to be determined to be within its limit every 24 hours when in MODES 3 and 4. ITS SR 3.1.1.1 requires SDM to be determined to be within its limit not only in MODES 3 and 4, but also in MODE 2 with $k_{eff} < 1.0$. This changes the CTS by expanding the applicability of the Surveillance to include MODE 2 with $k_{eff} < 1.0$.	SR 3.1.1.1	4.1.1.1.1.e
3.1.2 M.1	ITS SR 3.1.2.1 requires the measured core reactivity to be determined to be within ± 1% Δk/k of the predicted value prior to entering MODE 1 after each refueling. The CTS does not contain a similar requirement. This changes the CTS by adding an additional performance requirement for the core reactivity balance SR.	SR 3.1.2.1	N/A
3.1.4 M.1	CTS 3.1.3.1 Action b states that with more than one full length rod inoperable or misaligned from the group step counter demand position by more than the allowed rod misalignment, be in HOT STANDBY within 6 hours. ITS 3.1.4 ACTION D states that with more than one rod not within alignment limit, verify SDM is within limits or initiate boration to restore required SDM to within limit within one hour, and be in MODE 3 in 6 hours. This changes the CTS by adding new requirements to verify SDM limits or to initiate boration to restore SDM limits.	3.1.4 ACTION D	3.1.3.1 Action b
3.1.4 M.2	CTS 3.1.3.1 Action c states that with one full length rod misaligned, POWER OPERATION may continue provided that certain actions are completed within one hour. If those actions are not complete, CTS 3.0.3 would be entered requiring entry into Hot Standby (MODE 3) within 7 hours, for a total time from condition discovery to entry into MODE 3 of 8 hours. ITS 3.1.4 ACTION C states that if any Required Action and associated Completion Time of Condition B (one rod not within alignment limits) is not met, the unit must be in MODE 3 within 6 hours. The shortest Completion Time in ITS ACTION B is one hour. Therefore, under the ITS, the shortest possible time from discovery of the condition to entry into MODE 3 is 7 hours. This changes the CTS by providing one less hour for entry into MODE 3 following discovery of a misaligned rod if Required Actions are not met.	3.1.4 ACTION C	3.1.3.1 Action c
3.1.4 M.3	The CTS 3.1.3.3 (Unit 1) and CTS 3.1.3.4 (Unit 2) Action requires that with the drop time of any full length rod determined to exceed the limits of the LCO, to restore the rod drop time to within the limit prior to proceeding to MODE 1 or 2. However, no specific actions are stated in CTS 3.1.3.3 (Unit 1) and CTS 3.1.3.4 (Unit 2) if the unit is in MODE 1 or 2 when the rod drop time is discovered to not be within limits. Therefore, a CTS 3.0.3 entry would be required. CTS 3.0.3 allows one hour to prepare for a shutdown and requires the unit to be in MODE 3 within 7 hours. ITS 3.1.4 ACTION A applies with one or more rod(s) inoperable. It requires the verification of SDM to be within limits or to initiate boration to restore SDM to within limit within 1 hour, and requires the unit to be in MODE 3 in 6 hours. This changes the CTS by adding new requirements associated with SDM and changing the requirement to be outside of the MODE of Applicability from 7 hours to 6 hours.	3.1.4 ACTION A	3.1.3.3 Action (Unit 1), 3.1.3.4 Action (Unit 2)
3.1.5 M.1	CTS 3.1.3.4 (Unit 1) and CTS 3.1.3.5 (Unit 2) are applicable in MODE 1 and MODE 2 with $k_{eff} \geq 1.0$. ITS 3.1.5 is applicable in MODES 1 and 2. This changes the CTS by expanding the Applicability from MODE 2 with the reactor critical to all of MODE 2.	3.1.5 Applicability	3.1.3.4 Applicability (Unit 1), 3.1.3.5 Applicability (Unit 2)
3.1.6 M.1	CTS 3.1.3.5 (Unit 1) and CTS 3.1.3.6 (Unit 2) require the control banks to be limited in physical insertion as specified in the COLR. ITS 3.1.6 requires the control banks to be within the insertion, sequence, and overlap limits specified in the COLR. ITS 3.1.6 ACTION B provides requirements when not meeting the overlap and sequence limits, and ITS SR 3.1.6.3 requires verification of the overlap and sequence every 12 hours. This changes the CTS by adding requirements on the control bank overlap and sequence limits to the Technical Specifications.	LCO 3.1.6, 3.1.6 ACTION B, SR 3.1.6.3	3.1.3.5 (Unit 1), 3.1.3.6 (Unit 2)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.6 M.2	The CTS 3.1.3.5 Action (Unit 1) and the CTS 3.1.3.6 Action (Unit 2) require control banks inserted beyond the insertion limits to be restored within 2 hours. ITS 3.1.6 ACTION A contains the same requirement and adds the requirement to verify the SDM is within limits or initiate boration to restore SDM to within limits within 1 hour. This changes the CTS by adding the requirement to verify SDM or to initiate boration to restore the required SDM within one hour when control banks are below the insertion limits.	3.1.6 Required Actions A.1.1 and A.1.2	3.1.3.5 Action (Unit 1), 3.1.3.6 Action (Unit 2)
3.1.7 M.1	CTS 3.1.3.2 does not contain an Action to follow if the provided Actions cannot be met. Therefore, CTS 3.0.3 would be entered, which would allow 1 hour to initiate a shutdown and to be in HOT STANDBY within 7 hours. ITS 3.1.7 contains ACTION D, which states that the plant must be in MODE 3 within 6 hours if any Required Action and associated Completion Time is not met. This changes the CTS by eliminating the one hour to initiate a shutdown and, consequently, allowing one hour less for the unit to be in MODE 3.	3.1.7 ACTION D	3.1.3.2 Actions, 3.0.3
3.1.7 M.2	CTS 4.1.3.2 requires that each rod position indicator channel be determined to be OPERABLE by verifying the demand position indication system and the rod position indicator channels agree within the allowed rod misalignment at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor is inoperable, then compare the demand position indication system and the rod position indicator channels at least once per 4 hours. ITS 3.1.7 does not contain this requirement because it is duplicative of the requirement in CTS 4.1.3.1.1 (ITS SR 3.1.4.1). A new Surveillance has been added (ITS SR 3.1.7.1) to perform a CHANNEL CALIBRATION of each rod position channel once prior to criticality after each removal of the reactor head. This changes the CTS by adding the ITS requirement of SR 3.1.7.1.	SR 3.1.7.1	4.1.3.2
3.1.8 M.1	CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) state that limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS and provides restrictions that must be followed when utilizing the CTS exception. ITS 3.1.8 adds a requirement that SHUTDOWN MARGIN must be within the limits provided in ITS LCO 3.1.1 for MODE 2 with $k_{eff} < 1.0$. A Surveillance (SR 3.1.8.3) to verify the SHUTDOWN MARGIN every 24 hours and an ACTION (ACTION A) to follow if the SHUTDOWN MARGIN limit is not met are also added. This changes the CTS by imposing an additional requirement on the application of the test exception LCO.	LCO 3.1.8.b, 3.1.8 ACTION A, SR 3.1.8.3	N/A
3.1.8 M.2	CTS 4.10.4.1 (Unit 1) and CTS 4.10.3.1 (Unit 2) require THERMAL POWER to be verified to be < 5% RTP once per hour. ITS SR 3.1.8.2 requires the same verification be performed every 30 minutes. This changes the CTS by increasing the Frequency of the THERMAL POWER verification.	SR 3.1.8.2	4.10.4.1 (Unit 1), 4.10.3.1 (Unit 2)
3/4.10.1 M.1	CTS 3.10.1 provides an exception to the SHUTDOWN MARGIN requirements in CTS 3.1.1.1 in MODE 2 for the purpose of measurement of rod worth and shutdown margin provided the reactivity equivalent to at least the highest estimated control rod worth is available for trip insertion from OPERABLE control rod(s). According to the Bases, this special test exception is required to permit the periodic verification of the actual versus predicted core reactivity condition occurring as a result of fuel burnup or fuel cycling operations. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception.	N/A	3/4.10.1
3/4.10.2 M.1	CTS 3/4.10.2 provides an exception to the rod group height, rod insertion, and power distribution limits Specifications. This special test exception permits individual control rods to be positioned outside of their normal group heights and insertion limits during the performance of such PHYSICS TESTS as those required to 1) measure control rod worth and, 2) determine the reactor stability index and damping factor under xenon oscillation conditions. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception.	N/A	3/4.10.2

Table M - More Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3/4.10.3 M.1	CTS 3/4.10.3 provides an exception to the minimum temperature and pressure conditions for reactor criticality of Specifications 3.1.1.5 and 3.4.9.1 during low temperature PHYSICS TESTS provided some other restrictions are enforced. These restrictions are that THERMAL POWER does not exceed 5% of RATED THERMAL POWER, the reactor trip setpoints for the OPERABLE Intermediate Range, Neutron Flux and the Power Range, Neutron Flux, Low Setpoints are set at ≤ 25% of RATED THERMAL POWER, and the Reactor Coolant System temperature and pressure relationship is maintained within the region of acceptable operation shown on Figures 3.4-2 and 3.4-3. The ITS does not contain this special test exception. This changes the Unit 1 CTS by eliminating a special test exception.	N/A	3/4.10.3 (Unit 1 only)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.1 M.1	CTS 3.2.2 and CTS 3.2.6 do not contain an Action to follow if the provided Actions are not followed. Therefore, CTS 3.0.3 would be entered which would require the plant to be in MODE 2 within 7 hours. ITS 3.2.1 ACTION B states that when the Required Action and associated Completion Time is not met, the plant must be in MODE 2 within 6 hours. This changes the CTS by providing 6 hours instead of 7 hours to be in MODE 2.	3.2.1 ACTION B	3.2.2, 3.2.6, 3.0.3
3.2.1 M.2	CTS 4.2.2.2 requires $F_Q(Z)$ to be determined to be within its limit whenever $F_Q(Z)$ is measured for reasons other than meeting the requirement of CTS 4.2.6.2 or at least every 31 effective full power days (EFPD), whichever occurs first. ITS SR 3.2.1.1 requires a verification that $F_Q^C(Z)$ is within limit a) once within 24 hours after achieving equilibrium conditions after exceeding, by ≥ 10% RTP, the THERMAL POWER at which $F_Q^C(Z)$ was last verified; and b) every 31 EFPD thereafter. However, a Note is provided such that the SR is not required to be performed during power escalation at the beginning of each cycle until 24 hours after equilibrium conditions at a power level for extended operation are achieved. CTS 4.2.6.2 requires the APL to be determined to be within limit upon reaching equilibrium conditions after exceeding 10% or more of RTP, the THERMAL POWER at which APL was last determined or at least once per 31 EFPD, whichever occurs first. CTS 4.2.6.2 footnote ** however, allows the Surveillance to be deferred during power escalation at the beginning of each cycle until a power level for extended operation has been achieved. ITS SR 3.2.1.2 requires the $F_Q^W(Z)$ to be verified within the limit: a) once within 24 hours after achieving equilibrium conditions after exceeding, by ≥ 10% RTP, the THERMAL POWER at which $F_Q^W(Z)$ was last verified; and b) every 31 EFPD thereafter. (It should be noted that the term APL has been changed to $F_Q^W(Z)$ per DOC A.4). The ITS also includes a Note (Note 1) that allows the SR not to be performed during power escalation at the beginning of each cycle until 24 hours after equilibrium conditions at a power level for extended operation are achieved. This changes the CTS by adding a new Frequency (first Frequency) and new time limit (24 hours for the applicable Note) for CTS 4.2.2.2 and adding a new time limit (24 hours) for CTS 4.2.6.2, including footnote **.	SR 3.2.1.1, SR 3.2.1.2	4.2.2.2, 4.2.6.2 and footnote **
3.2.1 M.3	The CTS 3.2.6 Action provides actions for when the APL is less than the THERMAL POWER. However, there are no requirements to recalculate APL prior to increasing power, once the APL is less than THERMAL POWER. ITS 3.2.1 Required Action B.4 requires performance of SR 3.2.1.1 and SR 3.2.1.2 when $F_Q^W(Z)$ is not within limit prior to increasing THERMAL POWER above the limit established in Required Action B.1. (It should be noted that APL has been changed to $F_Q^W(Z)$ per DOC A.4). This changes the CTS by adding a new requirement to verify $F_Q^C(Z)$ and $F_Q^W(Z)$ are within limits prior to increasing THERMAL POWER after restoring $F_Q^W(Z)$ to within the limit.	3.2.1 Required Action B.4	3.2.6 Action
3.2.2 M.1	CTS 3.2.3 Action c states that with $F_{\Delta H}^N$ exceeding its limit "subsequent POWER OPERATION may proceed, provided that $F_{\Delta H}^N$ is demonstrated through incore mapping to be within its limit at a nominal 50% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, at a nominal 75% of RATED THERMAL POWER prior to exceeding this THERMAL POWER, and within 24 hours after attaining 95% or greater RATED THERMAL POWER." However, under CTS 3.0.2, these measurements do not have to be completed if compliance with the LCO is reestablished. ITS 3.2.2 Condition A contains a Note which states, “Required Actions A.2 and A.4 must be completed whenever Condition A is entered.” ITS Required Actions A.2 and A.4 require performance of a $F_{\Delta H}^N$ measurement every 24 hours and prior to exceeding 50% RTP and 75% RTP, and within 24 hours after THERMAL POWER is ≥ 95% RTP. This changes the CTS by requiring the $F_{\Delta H}^N$ measurements to be made even if $F_{\Delta H}^N$ is restored to within its limit.	3.2.2 Condition A Note	N/A

Table M - More Restrictive Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.2.3 M.1	CTS 3.2.1 Action a.2.a)2) requires THERMAL POWER to be reduced to < 50% RTP within 30 minutes if the AFD limits are not met when between 50% RTP and 90% RTP or 0.9 of APL (whichever is less). However, if the AFD limits are met during the 30 minute time limit, the CTS does not require continuation of the power reduction (as allowed by CTS 3.0.2). ITS 3.2.3 ACTION C (as stated in the Note to Condition C) requires completion of the power reduction to < 50% RTP, even if the AFD is restored to within limits prior to the expiration of the 30 minute time limit. The CTS is changed by now requiring power to be reduced to < 50% RTP when the Action is entered, even if the AFD is restored to within limits prior to expiration of the 30 minute time limit.	3.2.3 ACTION C	3.2.1 Action a.2.a)2)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.1	CTS Table 3.3-1 requires Functional Units 1 (Manual Reactor Trip) and 6 (Source Range, Neutron Flux) channels to be OPERABLE with the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal, as stated in Table 3.3-1 Note *. CTS Table 4.3-1 specifies the Surveillance Requirements for Functional Unit 1 (Manual Reactor Trip) channels are applicable in MODES 3, 4, and 5 with the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal, as stated in CTS Table 4.3-1 Note *. CTS Table 4.3-1 specifies the Surveillance Requirements for the Source Range Neutron Flux channels in MODES 3, 4, 5; however there is no reference to CTS Table 4.3-1 Note *. ITS Table 3.3.1-1, including Footnote (a), requires the Functions 1 (Manual Reactor Trip) and 5 (Source Range Neutron Flux) channels to be OPERABLE in MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or with one or more rods not fully inserted. This changes the CTS by requiring the Manual Reactor Trip and the Source Range Neutron Flux Functions to be OPERABLE when one or more rods are not fully inserted irrespective of the condition of the reactor trip breakers or the Control Rod Drive System. The change concerning the details of the reactor trip breakers are discussed in DOC LA.3 and the change that adds MODES 3, 4, and 5 is discussed in DOC A.18.	Table 3.3.1-1 Functions 1 and 5 (including Footnote (a))	Table 3.3-1 Functional Units 1 and 6 (including Note *)
3.3.1 M.2	With one Source Range Neutron Flux channel inoperable in MODE 2 below P-6 or with the RTS breakers in the closed position and the Control Rod Drive System capable of rod withdrawal, CTS Table 3.3-1 Action 4 limits the THERMAL POWER to the P-6 setpoint value until the inoperable channel is restored to OPERABLE status. ITS 3.3.1 ACTION G, which provides the actions for when one Source Range Neutron Flux channel is inoperable in MODE 2 below P-6, requires all operation involving positive reactivity additions to be immediately suspended. The requirement is modified by a Note that states limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM. ITS 3.3.1 ACTION I, which provides the actions for when one Source Range Neutron Flux channel is inoperable during MODE 3, 4, or 5 with Rod Control System capable of rod withdrawal or one or more rods not fully inserted, requires the channel to be restored to OPERABLE status within 48 hours or ITS 3.3.1 ACTION Q must be entered and action must be taken immediately to fully insert all rods and to place the Rod Control System in a condition incapable of rod withdrawal within one hour. This changes the CTS requirements for an inoperable Source Range Neutron Flux channel by limiting operation involving positive reactivity additions during operations in MODE 2 below the P-6 limit and limits the time a channel can be inoperable during MODE 3, 4, or 5 operations.	3.3.1 Required Action G.1 (including Note), 3.3.1 Required Action I.1, 3.3.1 Required Actions Q.1 and Q.2	Table 3.3-1 Action 4
3.3.1 M.3	CTS Table 4.3-1, Functional Unit 2 requires a daily and monthly CHANNEL CALIBRATION of the Power Range Neutron Flux channels. CTS Table 4.3-1 Note 8 specifies that the provision of Specification 4.0.4 are not applicable to these Surveillances. ITS Table 3.3.1-1 Function 2.a (Power Range Neutron Flux - High) requires the performance of SR 3.3.1.2 and ITS Table 3.3.1-1 Function 6 (Overtemperature ΔT) requires performance of SR 3.3.1.3. ITS SR 3.3.1.2 requires a comparison of the results of calorimetric heat balance calculation to Nuclear Instrumentation System (NIS) channel output every 24 hours. This Surveillance contains a Note (Note 2) that states that it is not required to be performed until 12 hours after THERMAL POWER is ≥ 15% RTP. ITS SR 3.3.1.3 requires a comparison of the results of the incore detector measurements to NIS AFD every 31 effective full power days (EFPD). This Surveillance contains a Note (Note 2) that states that it is not required to be performed until 24 hours after THERMAL POWER is ≥ 15% RTP. This changes the CTS by explicitly specifying the time required to perform the Surveillance after entering the specified Applicability.	SR 3.3.1.2 Note 2, SR 3.3.1.3 Note 2	Table 4.3-1 CHANNEL CALIBRATIONS requirements for Functional Unit 2 (including Note 8)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.4	CTS Table 3.3-1 Functional Units 2 (Power Range Neutron Flux), 3 (Power Range Neutron Flux High Positive Rate) and 4 (Power Range Neutron Flux High Negative Rate) require entry into Action 2 if one channel is inoperable. If the requirements of Action 2 are not met, entry into CTS 3.0.3 will be required since no further actions are specified. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.1 ACTION P, which is applicable if any Required Action and associated Completion Time of Condition C or D (as applicable to the above Functions) is not met, requires the unit to be in MODE 3 within 6 hours. This changes the CTS requirements by decreasing the time allowed to be in MODE 3 from 7 hours in the CTS to 6 hours in the ITS.	3.3.1 ACTION P	3.0.3 for Table 3.3-1 Functional Units 2, 3, and 4
3.3.1 M.5	With one Intermediate Range Neutron Flux channel inoperable, CTS Table 3.3-1 Action 3.b, when above the P-6 interlock and below 5% of RTP, requires the restoration of the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above 5% RTP. In addition, CTS Table 3.3-1 Action 3.c allows unlimited operation with an inoperable Intermediate Range Neutron Flux channel above 5% RTP. ITS 3.3.1 ACTION E, which provides actions for when one Intermediate Range Neutron Flux channel is inoperable, requires either a reduction of THERMAL POWER to < P-6 within 24 hours or the increase in THERMAL POWER to > P-10 within 24 hours. This changes the CTS by limiting the time the unit can operate with an inoperable Intermediate Range Neutron Flux channel above 5% RTP but below the P-10 interlock to 24 hours.	3.3.1 ACTION E	Table 3.3-1 Action 3.b and 3.c
3.3.1 M.6	In CTS 3.3.1.1, no action is provided for two inoperable Source Range Neutron Flux channels; therefore CTS 3.0.3 must be entered. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.1 ACTION H provides actions for two inoperable Source Range Neutron Flux channels and requires the reactor trip breakers (RTBs) to be opened immediately. This changes the CTS by requiring the RTBs to be opened immediately if both Source Range Neutron Flux channels become inoperable, in lieu of performing a controlled shutdown to MODE 3 in 7 hours.	3.3.1 ACTION H	3.0.3 for Table 3.3-1 Functional Unit 6
3.3.1 M.7	CTS Table 3.3-1 Functional Units 7, 8, 9, 10, 16, and 17 require entry into CTS Table 3.3-1 Action 6. CTS Table 3.3-1 Action 6 states that with the number of OPERABLE channels one less than the total number of channels, startup and power operations may proceed provided the inoperable channel is placed in the tripped condition within 1 hour. CTS Table 3.3-1 Functional Units 11 through 15, 18.A, and 18.B require entry into CTS Table 3.3-1 Action 7. CTS Table 3.3-1 Action 7 states that with the number of OPERABLE channels one less than the total number of channels, startup and power operations may proceed provided the inoperable channel is place in the tripped condition within 1 hour. CTS Table 3.3-1 Functional Unit 20 requires entry into CTS Table 3.3-1 Action 11. CTS Table 3.3-1 Action 11 states that with less than the minimum number of channels OPERABLE, operation may continue provided the inoperable channel is placed in the tripped condition within 1 hour. If CTS Table 3.3-1 Action 6, Action 7, or Action 11 is not met, entry into CTS 3.0.3 is required since no further actions are specified. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.1 ACTIONS N and P, which are applicable if any Required Action and associated Completion Time of Condition D or L is not met (as applicable to the above Functions), require the unit to be placed in MODE 3 within 6 hours (ACTION P) or require a reduction in THERMAL POWER to < P-7 within 6 hours (ACTION N). This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, and reducing the time to reach the applicable condition from 7 hours to 6 hours.	3.3.1 ACTIONS N and P	3.0.3 for Table 3.3-1 Functional Units 7, 8, 9, 10, 15, 16, 17, 18.A, 18.B, and 20

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.8	CTS 4.3.1.1.2 requires the logic for the interlocks be demonstrated OPERABLE prior to each reactor startup unless performed during the preceding 92 days. ITS Table 3.3.1-1 Functions 18.a through 18.e require the performance of an ACTUATION LOGIC TEST every 92 days on a STAGGERED TEST BASIS (ITS SR 3.3.1.5). This changes the CTS by changing the Surveillance Frequency from prior to each reactor startup unless performed during the preceding 92 days to every 92 days on a STAGGERED TEST BASIS.	SR 3.3.1.5	4.3.1.1.2
3.3.1 M.9	CTS Table 3.3-1 Action 13 does not allow the Reactor Trip Breaker (RTB) to be bypassed while one of the diverse trip features is inoperable except for the time required to perform maintenance to restore the breaker to OPERABLE status. However, no finite time to perform maintenance is specified. ITS 3.3.1 ACTION K does not include this allowance. This changes the CTS by eliminating the allowance for one RTB to be bypassed for maintenance on undervoltage or shunt trip mechanisms for an unlimited amount of time.	3.3.1 ACTION K	Table 3.3-1 Action 13
3.3.1 M.10	CTS Table 4.3-1 requires a CHANNEL CALIBRATION of Functional Units 7 and 8, the Overtemperature ΔT and Overpower ΔT channels, respectively. CTS Table 4.3-1 Note 9 modifies these CHANNEL CALIBRATION requirements, and specifies, in part, that the provisions of Specification 4.0.4 are not applicable for measurement of delta T. ITS Table 3.3.1-1 Functions 6 and 7 require the performance of ITS SR 3.3.1.15, a CHANNEL CALIBRATION for the Overtemperature ΔT and Overpower ΔT channels. ITS SR 3.3.1.15 is modified by a Note (Note 2) that states that normalization of the ΔT is not required to be performed until 72 hours after THERMAL POWER is ≥ 98% RTP. This changes the CTS by restricting the application of CTS 4.0.4 for measurement of delta T by requiring the performance of the Surveillance no later than 72 hours after THERMAL POWER is ≥ 98% RTP.	SR 3.3.1.15 Note 2	Table 4.3-1 CHANNEL CALIBRATION requirements for Functional Units 7 and 8 (including Note 9)
3.3.1 M.11	In CTS 3.3.1.1, no Action is provided for two inoperable Intermediate Range Neutron Flux channels; therefore CTS 3.0.3 must be entered. CTS 3.0.3 allows 1 hour to initiate action and 6 additional hours for the unit to be placed in MODE 3. ITS 3.3.1 ACTION F provides actions for two inoperable Intermediate Range Neutron Flux channels. ITS 3.3.1 Required Action F.1 requires the immediate suspension of operations involving positive reactivity additions. A Note modifies the Required Action and states "Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM." ITS 3.3.1 Required Action F.2 requires the reduction of THERMAL POWER to < P-6 within 2 hours. This changes the CTS by adding a specific ACTION to cover the condition for two inoperable Intermediate Range Neutron Flux channels.	3.3.1 ACTION F	3.0.3 for Table 3.3-1 Functional Unit 5
3.3.1 M.12	CTS Table 4.3-1, including Note 17, requires the performance of a CHANNEL FUNCTIONAL TEST for the Functional Unit 5 (Intermediate Range Neutron Flux) channels prior to each reactor startup if not performed in the previous 184 days. ITS Table 3.3.1-1 Function 4 requires the performance of a COT (SR 3.3.1.11) every 184 days. However, a Note (Note 1) states that the Surveillance is not required to be performed until 12 hours after reducing THERMAL POWER below the P-10 interlock. This effectively changes the CTS by requiring a COT be performed during a reactor shutdown within 12 hours after decreasing power below the P-10 interlock, if the COT has not been performed in the previous 184 days.	SR 3.3.1.10 Note 1	Table 4.3-1 FUNCTIONAL TEST requirement for Functional Unit 5 (including Note 17)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.13	CTS Table 4.3-1 requires a CHANNEL CALIBRATION of Functional Unit 7, the Overtemperature ΔT channels. CTS Table 4.3-1 Note 9 modifies the CHANNEL CALIBRATION requirement, and specifies, in part, that the provisions of Specification 4.0.4 are not applicable for f_1 (delta I) penalty. However, the CTS does not include a requirement to calibrate the excore channels to agree with the incore channels, which are needed to determine the f_1 (delta I) penalty. ITS Table 3.3.1-1 Function 7 requires the performance of ITS SR 3.3.1.7 for the Overtemperature ΔT channels. ITS SR 3.3.1.7 requires the calibration of excore channels to agree with incore detector measurements every 92 effective full power days. ITS SR 3.3.1.7 is modified by a Note that states that the Surveillance is not required to be performed until 24 hours after THERMAL POWER is ≥ 50% RTP. This changes the CTS by adding an explicit Surveillance to calibrate the excore channels to agree with incore detector measurements. This also changes the CTS by restricting the application of CTS 4.0.4 for the f_1 (delta I) penalty by requiring the performance of the Surveillance no later than 24 hours after THERMAL POWER is ≥ 50% RTP.	SR 3.3.1.7 (including Note)	Table 4.3-1 CHANNEL CALIBRATION requirement for Functional Unit 7 (including Note 9)
3.3.1 M.14	CTS Table 4.3-2 Functional Units 18.A and 18.B specify the Surveillance Requirements for the Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Functions and do not include a CHANNEL CALIBRATION requirement. ITS SR 3.3.1.13 has been added which requires a CHANNEL CALIBRATION of these channels every 24 months (ITS Table 3.3.1-1, Functions 16.a and 16.b). This changes the CTS by adding a CHANNEL CALIBRATION requirement for the Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Functions every 24 months.	SR 3.3.1.13 for Table 3.3-1 Functions 16.a and 16.b	N/A
3.3.1 M.15	CTS Table 4.3-1, Functional Units 2, 5, and 6 require a 92 day (for Functional Unit 2) and an 18 month (for Functional Units 5, 6, 12, and 13) CHANNEL CALIBRATION of the Power Range Neutron Flux, Intermediate Range Neutron Flux, Source Range Neutron Flux, Loss of Flow-Single Loop, and Loss of Flow-Two Loops channels, respectively. CTS Table 4.3-1 Note 8 specifies that the provision of Specification 4.0.4 are not applicable to the Functional Units 2, 5, 12, and 13 Surveillances and CTS Table 4.3-1 Note 14 specifies that the provisions of Specification 4.0.4 are not applicable to the Functional Unit 6 Surveillance when leaving MODE 1 and requires the Surveillance to be performed within 24 hours after leaving MODE 1. The ITS does not include these exceptions for the Power Range Neutron Flux, Intermediate Range Neutron Flux, Source Range Neutron Flux, and Loss of Flow (Single Loop and Two Loops) CHANNEL CALIBRATION Surveillances (ITS SRs 3.3.1.9, 3.3.1.13, and 3.3.1.14). This changes the CTS by deleting a CTS 4.0.4 exception for performing CHANNEL CALIBRATIONS of certain RTS channels.	N/A	Table 4.3-1 Note 8 for Functional Units 2, 5, 12, and 13, Table 4.3-1 Note 14 for Functional Unit 6
3.3.1 M.16	CTS Table 4.3-1, Functional Unit 16 (Undervoltage - Reactor Coolant Pumps) requires the performance of a CHANNEL CALIBRATION every 18 months, however the Surveillance is currently being performed more frequently. ITS Table 3.3.1-1 Function 12 (Undervoltage RCPs) requires the performance of CHANNEL CALIBRATION every 184 days (ITS SR 3.3.1.12). This changes the CTS by changing the Frequency of the Surveillance from 18 months to 184 days.	SR 3.3.1.12	Table 4.3-1 CHANNEL CALIBRATION requirement for Functional Unit 16
3.3.1 M.17	CTS Table 2.2-1 provides the Allowable Values for Functional Unit 8 (Overpower ΔT) (Unit 2 only), Functional Unit 9 (Pressurizer Pressure - Low) (Unit 1 only), Functional Unit 12 (Loss of Flow), Functional Unit 13, (Steam Generator Water Level - Low Low) (Unit 2 only), and Functional Unit 14, (Steam/Feedwater Flow Mismatch and Steam Generator Water Level - Low) (Steam Generator Water Level - Low portion only is covered by this change) (Unit 2 only). ITS Table 3.3.1-1 provides the Allowable Values for all the RTS Instrumentation Functions, including ITS Table 3.3.1-1 Functions 7, 8.a, 10, 14, and 15. This change revises the above specified CTS RTS Table 2.2-1 Allowable Values to the ITS Allowable Values.	Table 3.3.1-1 Functions 7 (Unit 2 only), 8.a (Unit 1 only), 10, 13 (Unit 1 only),14 (Unit 2 only), and 15 (Unit 2 only)	Table 2.2-1 Functional Units 8 (Unit 2 only), 9 (Unit 1 only), 12, 13 (Unit 2 only), 14 (Unit 2 only), and 16 (Unit 1 only)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1 M.18	CTS Table 4.3-1, including Note 4, requires a CHANNEL FUNCTIONAL TEST on the manual portion of the Safety Injection Input from ESFAS Function (Functional Unit 19) every 18 months. ITS Table 3.3.1-1 Function 17 requires the performance of ITS SR 3.3.1.6, a TADOT, every 92 days on a STAGGERED TEST BASIS. This changes the CTS by requiring the manual portion of each of the two trains of Functional Unit 19 to be tested every 184 days. The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.20.	Table 3.3.1-1 Function 17	Table 4.3-1 including Note 4
3.3.2 M.1	CTS Table 3.3-4 provides Allowable Values for Functional Units 1.f (Safety Injection Steam Line Pressure - Low) and 4.e (Steam Line Isolation Steam Line Pressure - Low), but does not explicitly provide requirements for the time constants of the lead/lag controllers associated with these Functional Units. ITS Table 3.3.2-1 Footnote (c) is applied to each of these Functions (ITS Table 3.3.2-1 Functions 1.e.(1) and 4.d) and provides requirements for the time constants for these lead/lag controllers. This changes the CTS by providing explicit values for the time constants of the Steam Line Pressure - Low lead/lag controllers.	Table 3.3.2-1 Functions 1.e.(1) and 4.d Footnote (c)	Table 3.3-4 Functional Units 1.f and 4.e
3.3.2 M.2	CTS Table 4.3-2 Functional Unit 5, which provides the Surveillance Requirements for the Turbine Trip and Feedwater Isolation instrumentation, does not include an Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 5.a requires the two Automatic Actuation Logic and Actuation Relays trains to be OPERABLE and requires the performance of SR 3.3.2.3, an ACTUATION LOGIC TEST, and SR 3.3.2.4, a MASTER RELAY TEST, every 92 days on a STAGGERED TEST BASIS, and SR 3.3.2.8, a SLAVE RELAY TEST, every 24 months. This changes the CTS by adding the explicit Surveillances for proposed Function 5.a, Automatic Actuation Logic and Actuation Relays, to the Technical Specifications. The addition of the LCO, number of channels, and ACTIONS is discussed in DOCs A.12 and L.8.	SR 3.3.2.3, SR 3.3.2.4, and SR 3.3.2.8 for Table 3.3.2-1 Function 5.a	N/A
3.3.2 M.3	CTS Table 4.3-2 Functional Unit 6, which provides the ESFAS instrumentation Surveillance Requirements for the motor driven AFW Pumps, and CTS Table 4.3-2 Functional Unit 7, which provides the ESFAS instrumentation Surveillance Requirements for the turbine driven AFW pump, do not provide any explicit requirements for the motor driven or turbine auxiliary feedwater (AFW) pump ESFAS Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 6.a requires the two Automatic Actuation Logic and Actuation Relays (Solid State Protection System) trains to be OPERABLE and requires the performance of SR 3.3.2.3, an ACTUATION LOGIC TEST, and SR 3.3.2.4, a MASTER RELAY TEST, every 92 days on a STAGGERED TEST BASIS, and SR 3.3.2.8, a SLAVE RELAY TEST, every 24 months. ITS Table 3.3.2-1 Function 6.b requires the two Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) trains to be OPERABLE and requires the performance of SR 3.3.2.11, an ACTUATION LOGIC TEST, every 24 months. This changes the CTS by adding the explicit Surveillances for proposed Functions 6.a, Auxiliary Feedwater (AFW) Automatic Actuation Logic and Actuation Relays (Solid State Protection System) and 6.b, AFW Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS) to the Technical Specifications. The addition of the LCO, number of channels, and ACTIONS is discussed in DOCs A.13 and L.17.	SR 3.3.2.2, SR 3.3.2.4, and SR 3.3.2.8 for Table 3.3.2-1 Function 6.a, SR 3.3.2.11 for Table 3.3.2-1 Function 6.b	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.4	CTS Table 3.3-3 Action 14 states that with the number of OPERABLE Functional Units 1.c through 1.f, 4.d, 4.e, 5.a, 6.a, 6.b, 7.a, or 10.c channels one less than the total number of channels, operations may proceed provided the inoperable channel is placed in the tripped condition within 1 hour. CTS Table 3.3-3 Action 16 states that with the number of OPERABLE Functional Units 2.c, 3.b.3), or 4.c channels one less than the total number of channels, operations may proceed provided the inoperable channel is placed in the bypassed condition. CTS Table 3.3-3 Action 19 states that with less than the minimum number of Functional Unit 7.b channels OPERABLE, startup and power operations may proceed provided the inoperable channel is placed in the tripped condition within 1 hour. If CTS Table 3.3-3 Action 14, Action 16, or Action 19 is not met, entry into CTS 3.0.3 is required since no further actions are specified. CTS 3.0.3 allows 1 hour to initiate action, 7 hours for the unit to be placed in MODE 3, 13 hours for the unit to be in MODE 4, and 37 hours for the unit to be in MODE 5. ITS 3.3.2 ACTION H requires the unit to be placed in MODE 3 in 6 hours, ITS 3.3.2 ACTION I requires the unit to be placed in MODE 3 in 6 hours, and ITS 3.3.2 ACTION J requires the unit to be placed in MODE 3 in 6 hours and MODE 5 in 36 hours. This changes the CTS by providing a specific default condition instead of requiring entry into CTS 3.0.3, and reducing the time allowed to reach the applicable conditions.	3.3.2 ACTIONS H, I, and J	3.0.3 for Table 3.3-3 Functional Units 1.c through 1.f, 2.c, 3.b.3), 4.c, 4.d, 4.e, 5.a, 6.a, 6.b, 7.a, 7.b, and 10.c
3.3.2 M.5	CTS Table 3.3-3 includes the ESFAS interlocks. The Table does not include the requirements for the P-4 interlock. ITS LCO 3.3.2 and Table 3.3.2-1 Function 8.a requires the OPERABILITY of the Reactor Trip P-4 interlock. This interlock requires one channel per train of this Function in MODES 1, 2, and 3. If one channel is inoperable, ITS 3.3.2 ACTION B provides 48 hours to restore the train to OPERABLE status. If not restored, ACTION I requires a unit shutdown to MODE 4. In addition, a requirement has been added to perform a TADOT (SR 3.3.2.9) every 24 months. This changes the CTS by adding the requirements for the P-4 interlock.	Table 3.3.2-1 Function 8.a, 3.3.2 ACTIONS B and I, SR 3.3.2.9	N/A
3.3.2 M.6	CTS Table 4.3-2 Functional Units 1.b, 2.b, 3.b.2), 4.b, and 10.b provide the Surveillance Requirements for the Automatic Actuation Logic. CTS Table 4.3-2 does not provide requirements to test the master and slave relays associated with this logic. ITS Table 3.3.2-1 Functions 1.b, 2.b, 3.b.(2), 4.b, and 7.b (the Automatic Actuation Logic and Actuation Relays Functions) require the performance of a MASTER RELAY TEST (SR 3.3.2.4) every 92 days on a STAGGERED TEST BASIS and a SLAVE RELAY TEST (SR 3.3.2.8) every 24 months. This changes the CTS by explicitly requiring the master and slave relays to be tested at the specified Frequencies.	SR 3.3.2.4, SR 3.3.2.8	N/A
3.3.2 M.7	Not used.		
3.3.2 M.8	CTS Table 4.3-2 Functional Unit 3.a, Containment Isolation Phase "A" Isolation, does not include the Automatic Actuation Logic and Actuation Relays Function. ITS Table 3.3.2-1 Function 3.a.(2) requires the two Automatic Actuation Logic and Actuation Relays trains to be OPERABLE and requires the performance of SR 3.3.2.3, an ACTUATION LOGIC TEST, and SR 3.3.2.4, a MASTER RELAY TEST, every 92 days on a STAGGERED TEST BASIS and SR 3.3.2.8, a SLAVE RELAY TEST, every 24 months. This changes the CTS by adding the explicit Surveillances for proposed ITS Table 3.3.2-1 Function 3.a.(2), Containment Isolation Phase A Isolation Automatic Actuation Logic and Actuation Relays, to the Technical Specifications. The addition of the LCO, number of channels, and ACTIONS is discussed in DOC A.7.	SR 3.3.2.3, SR 3.3.2.4, and SR 3.3.2.8 for Table 3.3.2-1 Function 3.a.(2)	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.2 M.9	CTS Table 3.3-3 Action 13 requires the unit to be in MODE 3 within 6 hours and MODE 5 within the following 30 hours if a Functional Unit 4.b, Steam Line Isolation Automatic Actuation Logic, or Functional Unit 10.b, Containment Air Recirculation Fan Automatic Actuation Logic, channel is inoperable (DOC L.9 discusses the addition of an allowable outage time prior to requiring a unit shutdown). However, CTS Table 3.3-3 Functional Units 4.b and 10.b are applicable only in MODES 1, 2, and 3. Thus, as described in CTS 3.0.1, CTS Table 3.3-3 Action 13 is only applicable in MODES 1, 2, and 3 for Functional Units 4.b and 10.b. ITS 3.3.2 ACTION I is the associated shutdown action for the above Functions, and it only requires the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by explicitly specifying that the unit is only required to be shut down to MODE 4, and that it must be performed within 12 hours, not 36 hours.	3.3.2 ACTION I	Table 3.3-3 Action 13 for Functions Units 4.b and 10.b, Table 3.3-3 Action 18 for Functional Unit 6.c
3.3.2 M.10	CTS Table 4.3-2, Functional Unit 6.b (Motor Driven AFW Pumps 4 kV Bus Loss of Voltage) and Functional Unit 7.b (Turbine Driven AFW Pump Reactor Coolant Pump Bus Undervoltage) require the performance of a CHANNEL CALIBRATION every 18 months, however the Surveillances are currently being performed more frequently. ITS Table 3.3.2-1 Function 6.e (Auxiliary Feedwater Loss of Voltage) and Function 6.f (Auxiliary Feedwater Undervoltage Reactor Coolant Pump) require the performance of a CHANNEL CALIBRATION every 184 days (ITS SR 3.3.2.7). This changes the CTS by changing the Frequency of the Surveillance from 18 months to 184 days.	SR 3.3.2.7	Table 4.3-2 CHANNEL CALIBRATION requirements for Functional Units 6.b and 7.b
3.3.2 M.11	CTS Table 3.3-4 provides the Allowable Values for Functional Unit 1.c (Safety Injection Containment Pressure - High), Functional Unit 1.f (Safety Injection Steam Line Pressure - Low) (Unit 1 only), Functional Unit 2.c (Containment Spray - Containment Pressure - High High), Functional Unit 3.b.3 (Containment Isolation Phase "B" Containment Pressure - High High), Functional Unit 4.c (Steam Line Isolation Containment Pressure – High High), Functional Unit 4.e (Steam Line Isolation Steam Line Pressure - Low) (Unit 1 only), Functional Unit 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 2 only), Functional Unit 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 2 only), and Functional Unit 10.c (Containment Pressure - High). ITS Table 3.3.2-1 provides the Allowable Values for all the ESFAS Instrumentation Functions, including ITS Table 3.3.2-1 Functions 1.c, 1.e.(1), 2.c, 3.b.(3), 4.c, 4.d, 6.c, and 7.c. This change revises the above specified CTS ESFAS Table 3.3-4 Allowable Values to the ITS Allowable Values.	Table 3.3.2-1 Functions 1.c, 1.e.(1) (Unit 1 only), 2.c, 3.b.(3), 4.c, 4.d (Unit 1 only), 6.c (Unit 2 only), and 7.c	Table 3.3-4 Functional Units 1.c, 1.f (Unit 1 only), 2.c, 3.b.3, 4.c, 4.e (Unit 1 only), 6.a (Unit 2 only), 7.a (Unit 2 only), and 10.c
3.3.2 M.12	CTS 4.3.2.1.2 requires the logic for the P-11 and P-12 interlocks to be tested during the automatic actuation logic test for the affected ESFAS Functions. It also requires the remainder of the interlock Functions to be tested during the CHANNEL CALIBRATION testing of the effected ESFAS Functions. These requirements are maintained in the ITS as SR 3.3.2.3 (for ITS Table 3.3.2-1 Function 1.b) and SR 3.3.2.10 (for ITS Table 3.3.2-1 Functions 8.b and 8.c). However, these same interlock Functions (ITS Table 3.3.2-1 Functions 8.b and 8.c) will now require performance of ITS SR 3.3.2.1 (a CHANNEL CHECK) every 12 hours and SR 3.3.2.6 (a CHANNEL OPERATIONAL TEST) every 184 days. This changes the CTS by adding two new Surveillance Requirements for these two interlock Functions.	SR 3.3.2.3, SR 3.3.2.10, Table 3.3.2-1 Functions 1.b, 8.b, and 8.c	4.3.2.1.2
3.3.3 M.1	Unit 1 CTS 3.3.3.8 Action a and Unit 2 CTS 3.3.3.6 Action a require, with the number of OPERABLE post accident monitoring instrumentation channels less than the minimum channels OPERABLE requirements of Table 3.3-11 (Unit 1) and Table 3.3-10 (Unit 2), that the inoperable channel be restored to OPERABLE status within 30 days. ITS 3.3.3 ACTION D requires, with one or more Functions with two required channels inoperable, restoration of one channel to OPERABLE status within 7 days. This changes the CTS requirement by reducing the allowed outage time when two required channels of a PAM instrumentation Function are inoperable from 30 days to 7 days.	3.3.3 Required Action D.1	3.3.3.6 Action a (Unit 2), 3.3.3.8 Action a (Unit 1)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M.2	Unit 1 CTS 3.3.3.8 Action a and Unit 2 CTS 3.3.3.6 Action a require, when required channels are not restored within the allowed outage time, that the unit be in at least HOT SHUTDOWN within the next 12 hours. ITS 3.3.3 ACTION G requires the unit to be placed in MODE 3 (HOT STANDBY) within 6 hours (Required Action G.1) and MODE 4 (HOT SHUTDOWN) within 12 hours (Required Action G.2). This changes the CTS requirement by requiring the unit to be in MODE 3 within 6 hours.	3.3.3 Required Action G.1 and G.2	3.3.3.6 Action a (Unit 2), 3.3.3.8 Action a (Unit 1)
3.3.3 M.3	Unit 1 CTS Table 3.3-11 and Unit 2 CTS Table 3.3-10, Instrument 16, requires one train (equivalent to one channel in ITS nomenclature) for the Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) Instrument to be OPERABLE. ITS Table 3.3.3-1 Function 6 requires two channels for the Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) to be OPERABLE. This changes the CTS requirements for the parameters from one to two required channels.	Table 3.3.3-1 Function 6	Table 3.3-10 Instrument 16 (Unit 2), Table 3.3-11 Instruments 16 (Unit 1)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M.4	Unit 1 CTS Table 3.3-11 and Unit 2 CTS Table 3.3-10 do not require OPERABLE indication channels for Neutron Flux, Penetration Flow Path Containment Isolation Valve Position, Steam Generator Water Level (Wide Range), Condensate Storage Tank Level, Emergency Core Cooling System Flow (per train), Containment Pressure (Wide Range), Component Cooling Water Pump Circuit Breaker Status. These are added to the CTS and shown in ITS Table 3.3.3-1, Functions 1, 9, 13, 14, 20, 21, and 24. Two channels are provided for Neutron Flux (Function 1). Two channels per penetration flow path are provided for Penetration Flow Path Containment Isolation Valve Position (Function 9). This requirement is modified by two footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel per penetration flow path with one installed channel located in the control room. Four channels are provided for Steam Generator Water Level (Wide Range) (Function 13). One channel is provided for Condensate Storage Tank Level (Function 14). Two channels per train are provided for Emergency Core Cooling System Slow (per train) (Function 20). Two channels are provided for Containment Pressure (Wide Range) (Function 21). Two channels are provided for Component Cooling Water Pump Circuit Breaker Status (Function 24). ITS 3.3.3 ACTION A has been added to cover the Condition when one or more of the above Functions, except Function 14, have one required channel inoperable and ITS 3.3.3 ACTION C has been added to cover the Condition when Function 14 has one required channel inoperable. ITS 3.3.3 Required Action A.1 and C.1 allow 30 days to restore the required channel to OPERABLE status. If the Required Action and associated Completion Time of Condition A is not met, then ITS Required Action B.1 requires the immediate initiation of the actions specified in Specification 5.6.6. ITS 3.3.3 ACTION D has been added to cover the Condition when one or more Functions have two required channels inoperable. ITS 3.3.3 Required Action D.1 requires restoration of one channel to OPERABLE status within 7 days. If this cannot be met, or if the Required Action and associated Completion Time of Condition C is not met, then ITS 3.3.3 Condition F must be entered, which will then require entry into Condition G (for Functions 1, 9, 13, 20, and 21) or into Condition H (for Functions 14 and 24). ITS 3.3.3 Required Action G.1 will require the unit to be in MODE 3 within 6 hours and MODE 4 within 12 hours, and ITS 3.3.3 Required Action H.1 will require immediate initiation of action in accordance with Specification 5.6.6. A Note has been added to the ACTIONS to allow Separate Condition entry for each Function. In addition, separate Condition entry is allowed within a Function for Function 9 on a penetration flow path basis and for Function 20 on a per train basis, since the titles of the Functions include the term “Penetration Flow Path,” or “(per train).” In addition, SRs are added for each Function. These SRs are a CHANNEL CHECK for each required instrumentation channel that is normally energized (SR 3.3.3.1) and a CHANNEL CALIBRATION (SR 3.3.3.3). For the CHANNEL CALIBRATION of the Neutron Flux Function channels, SR 3.3.3.3 is modified by a note that states "Neutron detectors are excluded from CHANNEL CALIBRATION." This changes the CTS by adding new Functions, Footnotes, a Note, applicable ACTIONS, and SRs.	Table 3.3.3-1 Functions 1, 9, 13, 14, 20, 21, and 24, 3.3.3 ACTIONS A, B, C, D, F, G, and H, 3.3.3 ACTIONS Note, SR 3.3.3.1, SR 3.3.3.3	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.3 M.5	Unit 1 CTS Table 4.3-7 and Unit 2 CTS Table 4.3-10 Instrument 15, Incore Thermocouples (Core Exit Thermocouples), and Instrument 16, Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) CHANNEL CALIBRATION requirements are modified by Notes (1) and (3), respectively. Note (1) states "Partial range channel calibration for sensor to be performed below P-12 in MODE 3." Note (3) states "Completion of channel calibration for sensors to be performed below P-12 in MODE 3." The ITS SR 3.3.3.3 requires the performance of a CHANNEL CALIBRATION for ITS Table 3.3.3-1 Functions 15, 16, 17, and 18 (Core Exit Temperature - Quadrants 1, 2, 3, and 4) and ITS Table 3.3.3-1 Function 6 (Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication)). This changes the CTS by deleting the allowances of Unit 1 CTS Table 4.3-7 and Unit 2 CTS Table 4.3-10 Notes (1) and (3).	N/A	Table 4.3-7 Notes (1) and (3) (Unit 1), Table 4.3-10 Notes (1) and (3)
3.3.3 M.6	CTS 3.3.3.1 Action c states that the provisions of Specification 3.0.3 are not applicable. CTS Table 3.3-6 Action 22A.3 states that Specification 3.0.3 is not applicable. ITS 3.3.3 does not include a LCO 3.0.3 exception. This changes the CTS by eliminating the CTS 3.0.3 exception.	N/A	3.3.3.1 Action c, Table 3.3-6 Action 22A.3
3.3.3 M.7	CTS 3.6.4.1, Hydrogen Analyzers, is applicable in MODES 1 and 2. CTS 3.6.4.1 Action b requires, if both hydrogen analyzers are inoperable for more than 72 hours, that the unit is to be placed in HOT STANDBY (MODE 3) within the next 6 hours. ITS 3.3.3 is applicable in MODES 1, 2, and 3. ITS 3.3.3 ACTION G requires, if two hydrogen analyzers are inoperable for greater than 72 hours, that the unit is to be placed in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS Applicability requirements for the hydrogen analyzers from MODES 1 and 2 to MODES 1, 2, and 3, and the Required Actions from being in MODE 3 to being in MODE 4.	3.3.3 Applicability, 3.3.3 Required Action F.2	3.4.6.1 Applicability, 3.4.6.1 Action b
3.3.4 M.1	CTS 3.3.3.5 Action a requires, if an inoperable channel cannot be returned to OPERABLE status within the allowed outage time, then the unit shall be placed in HOT SHUTDOWN within the next 12 hours. ITS 3.3.4 ACTION B requires, if a required channel cannot be returned to OPERABLE status within the associated Completion Time, then the unit shall be in MODE 3 (HOT STANDBY) within 6 hours and MODE 4 (HOT SHUTDOWN) within 12 hours. This changes the CTS requirements by specifying that MODE 3 must be achieved within 6 hours.	3.3.4 Required Action B.1	3.3.3.5 Action a
3.3.4 M.2	CTS Table 4.3-6 provides Surveillance Requirements for the remote shutdown monitoring instrumentation. For the Reactor Trip Breaker Indication Function, CTS Table 4.3-6 does not require Surveillances to be performed. ITS SR 3.3.4.2 requires a CHANNEL CALIBRATION for each required instrumentation channel be performed every 24 months, including the Reactor Trip Breaker Indication Function. This changes the CTS by requiring a CHANNEL CALIBRATION of the Reactor Trip Breaker Indication Function of the remote shutdown monitoring instrumentation.	SR 3.3.4.2	N/A
3.3.5 M.1	CTS Tables 3.3-3 and 4.3-2 requirements for the Loss of Voltage Function are applicable in MODES 1, 2, 3, and 4. ITS 3.3.5 requires the Loss of Voltage Function to be OPERABLE in MODES 1, 2, 3, and 4 and when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown." This changes the CTS by expanding the conditions under which the Loss of Voltage Function must be OPERABLE.	3.3.5 Applicability	Tables 3.3-3 and 4.3-2 Applicability for Functional Unit 8.a
3.3.5 M.2	CTS Table 4.3-2 requires a CHANNEL CALIBRATION of the Loss of Voltage and Degraded Voltage instrumentation every 18 months, however the Surveillances are currently being performed more frequently. ITS SR 3.3.5.3 requires the performance of a CHANNEL CALIBRATION every 184 days. This changes the CTS by changing the Frequency of the Surveillance from 18 months to 184 days.	SR 3.3.5.3	Table 4.3-2 CHANNEL CALIBRATION requirements for Functional Units 8.a and 8.b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5 M.3	CTS Table 3.3-4 provides the Allowable Values for Functional Unit 8.b (Loss of Power 4 kV Bus Degraded Voltage). ITS SR 3.3.5.3 provides the Allowable Values for the Degraded Voltage Function. This change revises the CTS Table 3.3-4 4 kV Bus Degraded Voltage Allowable Values to the ITS Allowable Values.	SR 3.3.5.3	Table 3.3-4 Functional Unit 8.b
3.3.6 M.1	The Applicability for CTS Table 3.3-3 Functional Units 3.c.2) (Containment Radioactivity - High Train A) and 3.c.3) (Containment Radioactivity - High Train B) is MODES 1, 2, 3, and 4. This requirement is modified by Note * that states that the Specification only applies during PURGE. ITS 3.3.6 requires the Containment Radiation Function of the Containment Purge Supply and Exhaust System isolation instrumentation to be OPERABLE in MODES 1, 2, 3, and 4 when any Containment Purge Supply and Exhaust System penetration flow path is open. This changes the CTS by requiring the Containment Radiation Function of the Containment Purge Supply and Exhaust System isolation instrumentation to be OPERABLE in MODES 1, 2, 3, and 4 when any Containment Purge Supply and Exhaust System penetration flow path is open, in lieu of just when PURGING. In addition, the Applicability for CTS Table 4.3-2 Functional Unit 3.c.2) (Containment Radioactivity - High) Surveillance Requirements is MODES 1, 2, 3, and 4, and the CTS footnote concerning PURGING is not included. This change also administratively corrects the Applicability of the CTS Surveillances to match the actual Specification Applicability.	Table 3.3.6-1 Applicability for Function 3	Table 3.3-3 Applicability for Functional Units 3.c.2) and 3.c.3) (including Note *), Table 4.3-2 Functional Unit 3.c.2)
3.3.6 M.2	CTS Table 3.3-3 Functional Unit 3.c provides requirements for Purge and Exhaust Isolation Functions, but does not explicitly provide requirements for the Automatic Actuation Logic and Actuation Relays Function that results in closure of the containment purge supply and exhaust isolation valves. ITS 3.3.6, "Containment Purge Supply and Exhaust System Isolation Instrumentation," provides requirements for the Automatic Actuation Logic and Actuation Relays Function (Function 2) to be OPERABLE and provides Surveillance Requirements (ITS SR 3.3.6.2, SR 3.3.6.3, and SR 3.3.6.5) to ensure the proper functioning of the associated actuation logic and relays. This changes the CTS by explicitly requiring the Automatic Actuation Logic and Actuation Relays Function for the Containment Purge Supply and Exhaust System isolation instrumentation to be OPERABLE.	Table 3.3.6-1 Function 2, SR 3.3.6.2, SR 3.3.6.3, SR 3.3.6.5	N/A
3.3.6 M.3	CTS Table 3.3-3 Functional Unit 3.c provides requirements for Purge and Exhaust Isolation Functions, but does not explicitly provide requirements for the Safety Injection signal that results in closure of the containment purge supply and exhaust isolation valves, with the exception of the manual Safety Injection signal. ITS 3.3.6, "Containment Purge Supply and Exhaust System Isolation Instrumentation," provides requirements for the Safety Injection Input from ESFAS Function (Function 4) to be OPERABLE in MODES 1, 2, 3, and 4. The proposed change provides a cross-reference to LCO 3.3.2," ESFAS Instrumentation,"Function 1, SI for all requirements and functions, including ACTIONS and Surveillances. In addition, ITS 3.3.6 ACTION D covers the condition when one or more SI Input from ESFAS trains are inoperable and requires the isolation of the affected penetration flow path by use of at least one closed automatic valve. This changes the CTS by explicitly requiring the Safety Injection Input from ESFAS Function for the Containment Purge Supply and Exhaust System isolation instrumentation.	Table 3.3.6-1 Function 4, SR 3.3.6.5	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.6 M.4	When one or more required channels of CTS Table 3.3-6 Instrument 2.A (Train A Containment Area Radiation, Particulate, and Noble Gas) or 2.B (Train B Containment Area Radiation, Particulate, and Noble Gas) inoperable, CTS Table 3.3-6 Action 22 requires compliance with the CTS 3.9.9 Action (i.e., close each containment purge and exhaust penetration). However, CTS Table 3.3-6 Action 22 includes an exception that states, "This ACTION is not required during the performance of containment integrated leak rate test." ITS 3.3.6 does not include this exception to CTS Table 3.3-6 Action 22. This changes the CTS by eliminating an exception to Action requirements.	N/A	Table 3.3-6 Action 22
3.3.6 M.5	CTS Table 3.3-3 "MINIMUM CHANNELS OPERABLE" column only requires two channels to be OPERABLE in MODES 1, 2, 3, and 4 during purging operations for Functional Unit 3.c.2) (Containment Radioactivity - High Train A) and for Functional Unit 3.c.3) (Containment Radioactivity - High Train B). Furthermore, CTS Table 3.3-3 ACTION 17, which is the ACTION referenced in Table 3.3-2 for the Containment Radioactivity - High Trains A and B Functional Units, is only applicable when the number of channels OPERABLE is less than the Minimum Channels OPERABLE requirement. Thus, while the CTS Table 3.3-3 states that each of the two Functional Units include "3" in the TOTAL NO. OF CHANNELS column, only 2 channels per Functional Unit are required to be OPERABLE and Actions are only required when two or more of the total number of channels are inoperable. ITS Table 3.3.6-1 requires three channels per train of the Containment Radiation Function (Function 3) to be OPERABLE in MODES 1, 2, 3, and 4 when any Containment Purge Supply and Exhaust System penetration flow path is open. Furthermore, when one of the three channels are inoperable, ITS 3.3.6 ACTION A requires the inoperable channel to be restored to OPERABLE status prior to entering MODE 4 from MODE 5 following a refueling. This allows continued operation and unlimited MODE changes during the cycle with an inoperable Function 3 channel, and only requires the inoperable channel to be restored before entering MODE 4 after a refueling outage. ITS 3.3.6 ACTION D is entered when two or more channels are inoperable, and provides requirements similar to those required by CTS Table 3.3-3 ACTION 17. This changes the CTS by: a) combining the requirements for Containment Radioactivity - High Train A and Train B Functional Units into one Containment Radiation Function and designating the channel requirements on a "per train" basis (as stated in the Title of Function 3); b) requiring three channels per train to be OPERABLE in lieu of the current requirement of two channels per train; and c) providing a new ACTION (ACTION A) for when one channel (of the three total channels) in a train is inoperable. The change to the Applicability is discussed on DOC M.1.	Table 3.3.6-1 ACTION A and D	Table 3.3-3 Action 17

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.8 M.1	CTS Table 3.3-1 “MINIMUM CHANNELS OPERABLE” column only requires one Source Range Neutron Flux monitoring channel to be OPERABLE in MODES 3, 4, and 5. Furthermore, CTS Table 3.3-1 ACTION 5, which is the ACTION referenced in Table 3.3-1 for the Source Range, Neutron Flux Functional Unit in MODES 3, 4, and 5, is only applicable when the number of channels OPERABLE is one less than required by the Minimum Channels OPERABLE requirement. Thus, while the CTS Table 3.3-1 states that the Source Range Neutron Flux Functional Unit includes “2" in the Total Number of Channels column, only 1 channel is required to be OPERABLE by CTS 3.3-1. ITS LCO 3.3.8 requires two source range neutron flux monitoring channels to OPERABLE in MODES 3, 4, and 5. In addition, ITS 3.3.8 ACTION A provides the requirements when one of the two channels are inoperable, and requires the inoperable channel to be restored to OPERABLE status in 7 days. If the inoperable channel is not restored, then the requirements of ITS 3.3.8 ACTION B are required. These requirements are similar to those required by the CTS when two channels are inoperable, except ITS 3.3.8 Required Action B.2.1 provides an allowance that if only one channel is inoperable, then the ITS 3.3.8 Required Actions B.2.2.1 and B.2.2.2 (which are consistent with CTS Table 3.3-1 Actions 5.b and 5.c) are not required. This changes the CTS by requiring an additional source range neutron flux monitoring channel to be OPERABLE in MODES 3, 4, and 5, and provides appropriate Actions when the additional channel is inoperable.	3.3.8 ACTION A and B	Table 3.3-1 Action 5

Table M - More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.1 M.1	CTS 4.2.5.3 states that the Reactor Coolant System (RCS) total flow rate shall be determined. CTS 4.2.5.4 states that the provisions of CTS 4.0.4 shall not apply to primary flow surveillances. ITS SR 3.4.1.4 requires measurement of the RCS total flow rate and is modified by a Note which states, "Not required to be performed until 24 hours after ≥ 90% RTP." This changes the CTS by explicitly specifying the time required to perform the Surveillance after entering MODE 1 conditions.	SR 3.4.1.4	4.2.5.3, 4.2.5.4
3.4.3 M.1	CTS 3.4.9.1 Action states that if the P/T limits are exceeded, an analysis must be performed to determine if the RCS remains acceptable for continued operation. No time limit is given for the performance of this analysis. ITS 3.4.3 Required Action A.2 states that when the LCO is not met in MODES 1, 2, 3, or 4, an evaluation is required to be performed to determine if the RCS is acceptable for continued operation within 72 hours. ITS 3.4.3 Required Action C.2 states that when the LCO is not met any time in other than MODE 1, 2, 3, or 4, an evaluation is required to be performed to determine if the RCS is acceptable for continued operation prior to entering MODE 4. This changes the CTS by specifying a finite time to complete the analysis.	3.4.3 Required Actions A.2 and C.2	3.4.9.1 Action
3.4.5 M.1	CTS LCO 3.4.1.2.b states that at least two reactor coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by Footnote * that states that all reactor coolant pumps may be de-energized for up to 1 hour. ITS 3.4.5 contains the same allowance, but limits the use of the 1 hour exception to once per 8 hour period.	LCO 3.4.5 Note	LCO 3.4.1.2.b (including footnote *)
3.4.5 M.2	CTS 3.4.1.2 Action a states that when less than the required reactor coolant loops are OPERABLE, the required loops must be restored to OPERABLE status within 72 hours. CTS 3.4.1.2 Action b states that with less than the number of operating coolant loops required by item c (of the LCO statement), restore the required number of coolant loops within 2 hours or open the reactor trip breakers. CTS 3.4.1.2 Action d states that when no reactor coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended and action must be initiated to return the required loop to operation. ITS 3.4.5 ACTION A specifies the Required Action for one required RCS loop inoperable. The Required Action is to restore the RCS loop to OPERABLE status within 72 hours. ITS 3.4.5 ACTION C specifies the Required Action for one required RCS loop not in operation with Rod Control System capable of rod withdrawal. The Required Action is to place the Rod Control System in a condition incapable of rod withdrawal within 2 hours. ITS 3.4.5 ACTION D specifies the Required Actions for two required RCS loops inoperable and for no required RCS loops in operation (i.e., two required RCS loops not in operation with Rod Control System capable of rod withdrawal or the required RCS loop not in operation with Rod Control System not capable of rod withdrawal). The Required Actions are to immediately place the Rod Control System in a condition incapable of rod withdrawal, immediately suspend operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one RCS loop to OPERABLE status and operation. This changes the CTS by revising the Actions to immediately require actions to be taken when two required RCS loops are inoperable or two RCS loops are not in operation when the Rod Control System is capable of rod withdrawal.	3.4.5 ACTIONS A, C, and D	3.4.1.2 Actions a, b, and d

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.5 M.3	CTS 3.4.1.2 specifies requirements for reactor coolant loops to be OPERABLE with each loop consisting of an RCS loop, its associated steam generator, and its reactor coolant pump. However, CTS 3/4.1.2 does not define the OPERABILITY requirements for the steam generator or provide any associated Surveillance Requirements. ITS SR 3.4.5.2 requires verification that each required steam generator has a secondary side water level above the lower tap of the SG wide range level instrumentation by ≥ 420 inches (Unit 1) and ≥ 418.77 inches (Unit 2) every 12 hours. This changes the CTS by defining the OPERABILITY requirements for a steam generator, with respect to this Specification.	SR 3.4.5.2	3.4.1.2
3.4.6 M.1	CTS LCO 3.4.1.3.b states that at least two coolant loops shall be OPERABLE and at least one must be in operation. This requirement is modified by Footnote ** that states that all reactor coolant pumps and residual heat removal pumps may be de-energized for up to 1 hour. ITS 3.4.6 contains the same allowance, but limits the use of the 1 hour exception to once per 8 hour period.	LCO 3.4.6 Note	LCO 3.4.1.3.b (including footnote **)
3.4.6 M.2	CTS 3.4.1.3 Action a states that with less than the above required coolant loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status. ITS 3.4.6 ACTION A specifies the Required Action for one required loop inoperable. The Required Action is to immediately initiate action to restore a second loop to OPERABLE status. ITS 3.4.6 ACTION B specifies the Required Actions for when two required loops are inoperable. The Required Actions are to immediately suspend operations that would cause introduction into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, and to initiate action to restore one loop to OPERABLE status and operation. This changes the CTS by revising the actions to immediately require actions to be taken when two required loops are inoperable.	3.4.6 ACTIONS A and B	3.4.1.3 Action a
3.4.6 M.3	CTS 4.4.1.3.2 states that the required reactor coolant pump(s), if not in operation, shall be determined OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.6.3 requires verification that correct breaker alignment and indicated power are available to the required pump not in operation. ITS LCO 3.4.6 allows a combination of reactor coolant pumps and RHR pumps. This changes the CTS by requiring verification of correct breaker alignment and indicated power availability on required RHR pumps that are not in operation.	SR 3.4.6.3	4.4.1.3.2
3.4.6 M.4	The CTS do not include operating restrictions for starting reactor coolant pumps (RCPs) in MODE 4. However, CTS 3.4.1.4 Footnote ***, applicable in MODE 5 with reactor coolant loops filled, does provide a restriction that specifies that a reactor coolant pump shall not be started with one or more of the Reactor Coolant System (RCS) cold leg temperatures less than or equal to 152°F unless certain conditions exist. ITS 3.4.6 NOTE 2 includes the operating restrictions of this Footnote. This changes the CTS by requiring this operating restriction in MODE 4.	3.4.6 Note 2	3.4.1.4 Footnote ***
3.4.7 M.1	CTS 3.4.1.4 Actions do not include Actions for when there are no required RHR loops OPERABLE. ITS 3.4.7 ACTION C includes this Condition and requires the immediate suspension of operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, and to immediately initiate action to restore one RHR loop to OPERABLE status and operation. This changes the CTS by adding the explicit requirements to ITS 3.4.7.	3.4.7 ACTION C	N/A
3.4.7 M.2	CTS 3/4.4.1.4 does not contain an explicit Surveillance Requirement to verify correct breaker alignment and indicated power for the required RHR pump that is not in operation. ITS SR 3.4.7.3 requires this SR to be conducted every 7 days, however the SR is not required to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding the ITS requirement of SR 3.4.7.3.	SR 3.4.7.3	N/A

Table M - More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.7 M.3	CTS 3.4.1.4 states the number of coolant loops that shall be OPERABLE, and states that at least one RHR loop must be in operation. This requirement is modified by a note that states that the RHR pump may be de-energized for up to 1 hour. ITS 3.4.7 contains the same allowance, but limits the use of the 1 hour exception to once per 8 hour period.	LCO 3.4.7 Note 1	3.4.1.4 footnote *
3.4.8 M.1	CTS 3.4.1.5 Actions do not include actions for when there is no required RHR loops OPERABLE. ITS 3.4.8 ACTION B includes this Condition and requires the immediate suspension of operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1 and to immediately initiate action to restore one RHR loop to OPERABLE status and operation. This changes the CTS by adding the explicit Condition for no required RHR loop OPERABLE and provides the appropriate compensatory actions.	3.4.8 ACTION B	N/A
3.4.8 M.2	CTS 4.4.1.5 does not contain an explicit requirement to verify correct breaker alignment and indicated power for the required RHR pump that is not in operation. ITS SR 3.4.8.2 requires this SR to be conducted every 7 days, however the SR is not required to be performed until 24 hours after a required pump is not in operation. This changes the CTS by adding the ITS requirement of SR 3.4.8.2.	SR 3.4.8.2	N/A
3.4.8 M.3	CTS 3.4.1.5 Footnote * contains an allowance for the RHR pump to be de-energized for up to one hour. ITS LCO 3.4.8 Note 1 allows all RHR pumps to be removed from operation for ≤ 30 minutes only when switching from one loop to the other, and also requires that no draining operations to further reduce the RCS water volume are permitted (part c). This changes the CTS by reducing the time allowed for the RHR pump to be de-energized from 1 hour to 30 minutes, restricts the allowance to only pump switching operations, and adds a restriction that no draining operations are permitted to further reduce the RCS water volume.	LCO 3.4.8 Note 1	3.4.1.5 footnote *
3.4.9 M.1	CTS 3.4.4 Action a states, in part, to be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the "following" 12 hours. Under the same condition, ITS 3.4.9 Required Action C.2 requires the unit to be in MODE 4 within 12 hours. This changes the CTS by reducing the time the unit must be in MODE 4 from 18 hours (6 hours to be in MODE 3 and the "following" 12 hours to be in MODE 4) to 12 hours.	3.4.9 Required Action C.2	3.4.4 Action a
3.4.9 M.2	CTS 3.4.4 Action b requires the unit to be in at least MODE 4 with the reactor trip breakers open within 12 hours if the pressurizer water level limit is not met. Under the same condition, ITS 3.4.9 ACTION A also requires the unit to be in MODE 3, to fully insert all rods, and place the Rod Control System in a condition incapable of rod withdrawal within 6 hours. In addition, the unit is required to be in MODE 4 in 12 hours. This changes the CTS by replacing the requirement to open the reactor trip breakers within 12 hours to requiring the unit to be in MODE 3, to fully insert all rods, and place the Rod Control System in a condition incapable of rod withdrawal within 6 hours.	3.4.9 ACTION A	3.4.4 Action b

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.10 M.1	CTS 3.4.2 requires a minimum of one pressurizer safety valve to be OPERABLE during MODES 4 and 5. Thus, one or two of the three safety valves are allowed to be inoperable indefinitely in MODES 4 and 5. ITS LCO 3.4.10 requires three pressurizer safety valves to be OPERABLE during MODE 4 with all RCS cold leg temperatures > 266°F (Unit 1) and > 299°F (Unit 2). With one of the three pressurizer safety valves inoperable, ITS 3.4.10 ACTION A states that the valve must be restored to OPERABLE status within 15 minutes. If this cannot be met, ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 266°F (Unit 1) and ≤ 299°F (Unit 2) in 24 hours. In addition, ITS 3.4.10 ACTION B requires these same actions to place the unit outside of the Applicability of the Specification when two of the three pressurizer safety valves are inoperable. This changes the CTS by requiring three safety valves to be OPERABLE and by specifying new Required Actions for when one or two of the three valves are inoperable. The change to the Applicability is discussed in DOC L.1. The change to the remainder of the CTS 3.4.2 Actions is discussed in DOC L.3.	LCO 3.4.10, 3.4.10 ACTIONS A and B	3.4.2
3.4.11 M.1	CTS 3.4.11 describes the Actions to be taken when PORV(s) and/or block valve(s) are inoperable. ITS 3.4.11 also describes Actions to be taken when PORV(s) and/or block valve(s) are inoperable and contains a statement (ITS 3.4.11 ACTION Note) that separate condition entry is allowed for each PORV and each block valve. This changes the CTS by adding a Note stating that separate condition entry is allowed for each PORV.	3.4.11 ACTION Note	3.4.11 Actions a, b, c, d, e, f, and g
3.4.11 M.2	CTS 3.4.11 Action e provides an option to place the associated PORV in manual control or to close the block valve and remove power from the block valve when it is found that one block valve is inoperable. ITS 3.4.11 ACTION C specifies to place the PORVs in manual control. This changes the CTS by deleting the option to close the block valve and remove power from the block valve when the block valve is found to be inoperable.	N/A	3.4.11 Action e
3.4.12 M.1	The CTS LTOP Specifications provide no limitations on the accumulators. ITS LCO 3.4.12.A.1 and LCO 3.4.12.B.1 states that the accumulators shall be isolated, except an accumulator may be unisolated when the accumulator is depressurized and vented." ITS 3.4.12 ACTION C states that if an accumulator is not isolated when the accumulator is not depressurized and vented, then the affected accumulator must be isolated within 1 hour. If this isolation is not accomplished, ITS 3.4.12 ACTION D states that the RCS cold leg temperature must be increased to > 266°F (Unit 1) and > 299°F (Unit 2) or the affected accumulator must be depressurized and vented within 12 hours. ITS SR 3.4.12.3 requires verification that each accumulator is isolated every 12 hours.	LCO 3.4.12.b, 3.4.12 ACTIONS C and D, SR 3.4.12.3	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 M.2	CTS 3.4.9.3 is applicable in MODE 5 when the temperature of any RCS cold leg is ≤ 152ºF, and MODE 6 when the head is on and fastened to the reactor vessel and the RCS is not vented through a 2-square-inch or larger vent, or through any single blocked open PORV. CTS 4.4.9.3.1.a requires the performance of a CHANNEL FUNCTIONAL TEST on the PORV actuation channel (excluding valve actuation) prior to entering the Applicability of CTS 3.4.9.3. ITS LCO 3.4.12 is applicable in MODE 4 when any RCS cold leg temperature is ≤ 266ºF (Unit 1) and ≤ 299ºF (Unit 2), MODE 5, and MODE 6 when the reactor vessel head is on. ITS SR 3.4.12.8, which is required under the same Applicability described above for ITS LCO 3.4.12, requires a similar test on the PORV actuation channel. However the SR is modified by a Note that states that the test is not required to be performed until 12 hours after decreasing RCS cold leg temperature to ≤ 266°F (Unit 1) and ≤ 299°F (Unit 2). This change expands the Applicability to require the low temperature overpressure protection systems to be OPERABLE in MODE 4 when any RCS cold leg temperature is ≤ 266ºF (Unit 1) and ≤ 299ºF (Unit 2), and at all times in MODE 5. Furthermore, this changes the CTS by providing an explicit Note that allows testing of the PORV instrumentation after entering the MODE of Applicability of the Specification. Along with this change, proposed ITS 3.4.12 ACTIONS Note has been added that states that LCO 3.0.4.b is not applicable when entering MODE 4. In addition, proposed ITS 3.4.12 ACTION E has been added to cover the inoperabilities associated with one required RCS relief valve in MODE 4. ITS 3.4.12 Required Action E.1 states to restore required RCS relief valve to OPERABLE status within 7 days.	3.4.12 Applicability, 3.4.14 ACTION E	3.4.9.3 Applicability
3.4.12 M.3	CTS 3.4.9.3 Applicability states that the requirement of CTS LCO 3.4.9.3 are applicable when in MODE 6 when the head is on and fastened to the reactor vessel and the RCS is not vented through a 2-square-inch or larger vent or any single blocked open PORV. ITS LCO 3.4.12.A.12.c states that one of the pressure relief capabilities allowed is the RCS depressurized and an RCS vent of ≥ 2.0 square inches or any single blocked open PORV. The ITS 3.4.12 Applicability states the LCO is applicable in MODE 6 when the reactor vessel head is on. This changes the CTS by requiring the MODE 6 Applicability to include the situation when all reactor vessel head closure bolts are removed and the head is still on.	LCO 3.4.12, 3.4.12 Applicability	3.4.9.3 Applicability
3.4.12 M.4	Not used.		
3.4.12 M.5	CTS 3.4.1.4 Applicability Footnote *** specifies restrictions for reactor coolant pump startups with one or more of the RCS cold leg temperatures ≤ 152ºF. The Specification does not provide compensatory actions for when this requirement is not met. ITS LCO 3.4.12 Note contains the requirements of this CTS Footnote. In addition, a new ACTION has been added to cover the situation when the requirements are not met. ITS 3.4.12 ACTION G requires a depressurization of the RCS and the establishment of an RCS vent ≥ 2.0 square inches or any single blocked open PORV when the LTOP System is inoperable for any reason other than ITS 3.4.12 Condition A, B, C, D, E, or F. This changes the CTS by ensuring the appropriate Condition and Required Actions are taken.	3.4.12 ACTION G	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.12 M.6	CTS LCO 3.5.3 requires one ECCS subsystem to be OPERABLE in MODE 4. CTS LCO 3.5.3.a requires one centrifugal charging pump to be OPERABLE; however this requirement is modified by Footnote #, which specifies that a maximum of one centrifugal charging pump shall be OPERABLE and both safety injection pumps shall be inoperable whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. CTS 4.5.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. CTS 3.5.3 Action c provides the compensatory actions to be taken when more than one charging pump is OPERABLE or with one or more safety injection pumps OPERABLE when the temperature of any RCS cold leg is ≤ 152ºF. CTS LCO 3.1.2.3.a requires one charging pump in the boron injection flow path required by Specification 3.1.2.1 to be OPERABLE and CTS LCO 3.1.2.3.b requires one charging flow path associated with support of Unit 2 shutdown functions to be available. LCO 3.1.2.3.b is modified by a footnote that states that a maximum of one centrifugal charging pump shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. LCO 3.1.2.3.a is applicable in MODES 5 and 6, and CTS LCO 3.1.2.3.b is applicable at all times when Unit 2 (Unit 1) and Unit 1 (Unit 2) is in MODES 1, 2, 3, or 4. CTS 4.1.2.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump, to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits except when the reactor vessel head is removed or the temperature of one or more of the RCS cold legs is > 152ºF. CTS 3.1.2.3 Action b provides the compensatory actions to be taken when more than one charging pump is OPERABLE or with one or more safety injection pumps OPERABLE when the temperature of any RCS cold leg is ≤ 152ºF unless the reactor vessel head is removed. ITS LCO 3.4.12.A requires a maximum of one charging pump and no safety injection (SI) pump capable of injecting into the RCS. The Applicability of the Specification has been changed to be consistent with CTS 3.4.9.3 as modified by DOCs M.2, and M.3. The new Applicability is MODE 4 when any RCS cold leg temperature is ≤ 266ºF (Unit 1) and ≤ 299ºF (Unit 2), MODE 5, and MODE 6 when the reactor vessel head is on. ITS 3.4.12 ACTION A covers the situation when one or more SI pumps capable of injecting into the RCS. ITS 3.4.12 ACTION B covers the situation when two charging pumps are capable of injecting into the RCS. In addition, ITS 3.4.12 ACTIONS Note has been added that states that LCO 3.0.4.b is not applicable when entering MODE 4. This changes the CTS by aligning the Applicability with the LTOP Specification. The pumps must not be capable of injecting into the RCS over a wider RCS cold leg temperature band.	LCO 3.4.12.a, LCO 3.4.12 Note 3, 3.4.12 Applicability, 3.4.12 ACTIONS A and B	LCO 3.5.3.a footnote #, 3.5.3 Action c, 4.5.3.2, LCO 3.1.2.3.b footnote *, 3.1.2.3 Action b, 4.1.2.3.2
3.4.12 M.7	CTS 3.5.3 Action c and CTS 3.1.2.3 Action b provides the compensatory actions to be taken when more than one charging pump OPERABLE or with a safety injection pump(s) OPERABLE. The requirement is to remove the additional charging pump(s) and the safety injection pump(s) motor circuit breakers from the electrical power circuit with 1 hour. ITS 3.4.12 ACTION A covers the situation when one or more SI pumps are capable of injecting into the RCS. ITS 3.4.12 Required Action A.1 is to immediately initiate action to verify all SI pumps are not capable of injecting into the RCS. ITS 3.4.12 ACTION B covers the situation when two charging pumps are capable of injecting into the RCS and only one charging pump is allowed to be capable of injecting into the RCS. ITS 3.4.12 Required Action B.1 is to immediately initiate action to verify a maximum of one charging pump is capable of injecting into the RCS. The changes CTS 3.5.3 Action c to require "immediate" response instead of a response "within 1 hour."	3.4.12 Required Actions A.1 and B.1	3.5.3 Action c, 3.1.2.3 Action b

Table M - More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.13 M.1	(Unit 1 only) CTS 3.4.6.2.b states that the Reactor Coolant System leakage shall be limited to 1 gpm UNIDENTIFIED LEAKAGE. CTS 3.4.6.2 Action b allows 4 hours to reduce leakage to within limits with any RCS leakage greater than any one of the limits, excluding pressure boundary leakage. Unit 1 ITS LCO 3.4.13.b states that the RCS unidentified LEAKAGE limit is 0.8 gpm. Unit 1 ITS 3.4.13 ACTION A states that if the unidentified leakage is > 0.8 gpm, to verify the source of unidentified LEAKAGE is not the pressurizer surge line or to reduce unidentified LEAKAGE to within limit in 4 hours. Unit 1 ITS 3.4.13 ACTION B states that if unidentified LEAKAGE is > 1.0 gpm, to reduce unidentified LEAKAGE to≤ 1.0 gpm within 4 hours. This changes the Unit 1 CTS by decreasing the unidentified LEAKAGE limit from 1 gpm to 0.8 gpm and provides additional Actions if the unidentified LEAKAGE is not within the new 0.8 gpm limit but ≤ 1.0 gpm.	LCO 3.4.13.b (Unit 1 only), 3.4.13 ACTIONS A and B (Unit 1 only)	3.4.6.2.b (Unit 1 only), 3.4.6.2 Action b (Unit 1 only),
3.4.13 M.2	CTS 4.4.5.0 requires the demonstration that each steam generator is OPERABLE. CTS 3.4.5 Action requires the restoration of the inoperable steam generator prior to increasing T_{avg} above 200°F. CTS 3.4.5 Action does not state what action to take if the steam generator testing is not met while in MODE 1, 2, 3, or 4; it only includes a requirement that the testing be performed prior to entering MODE 1, 2, 3, or 4 (i.e., increasing Reactor Coolant System temperature above 200°F). Thus, entry into CTS 3.0.3 is required if CTS 4.4.5.0 is not met while in MODE 1, 2, 3, or 4. CTS 3.0.3 allows 1 hour to prepare for shutdown of the unit, and requires the unit to be in MODE 3 within 7 hours and MODE 5 within 37 hours. ITS SR 3.4.13.2 requires the demonstration that each steam generator is OPERABLE. ITS 3.4.13 ACTION B requires the unit to be placed in MODE 3 within 6 hours and MODE 5 within 36 hours whenever SR 3.4.13.2 is not met in the applicable MODES. This changes the CTS by stating the ACTIONS rather than deferring to CTS 3.0.3. In addition, it deletes the CTS Actions to restore the limits prior to entering MODE 1, 2, 3, or 4.	3.4.13 ACTION B	3.4.5 Action, 3.0.3
3.4.14 M.1	CTS 3.4.6.2 Action c specifies the compensatory actions to take when the leakage by any RCS PIV(s) is greater than the specified limit. The compensatory action is to isolate the high pressure portion of the affected system from the low pressure portion by the use of a combination of at least two closed valves, one of which may be the OPERABLE check valve and the other a closed de-energized motor operated valve. The CTS does not include any leakage restrictions concerning the valves that may be used to satisfy the isolation requirement of this action. ITS 3.4.14 ACTION A is consistent with the requirement in CTS 3.4.6.2 Action c, however, a Note has been added to the Required Actions (ITS 3.4.14 Required Actions A.1 and A.2 Note) which specifies that each valve used to satisfy ITS 3.4.14 Required Actions A.1 and A.2 must have been verified to meet SR 3.4.14.1, the RCS PIV leakage limit Surveillance Requirement, and either be in the reactor coolant pressure boundary or the high pressure portion of the system. This changes the CTS by providing a Note which explicitly states that the valves used to satisfy Required Action must satisfy the same requirements of the RCS PIVs.	3.4.14 Required Actions A.1 and A.2 Note	3.4.6.2 Action c
3.4.15 M.1	CTS 3.4.6.1 does not contain an explicit requirement to perform a Reactor Coolant System (RCS) water inventory balance (CTS 3.3.3.3, ITS SR 3.4.13.1) when the required RCS containment sump monitoring system is found to be inoperable. ITS 3.4.15 Required Action A.1 requires the performance of ITS SR 3.4.13.1, the RCS water inventory balance Surveillance, once per 24 hours when it is discovered that the required containment sump monitor is inoperable. This changes the CTS by adding the requirement to perform ITS SR 3.4.13.1 when the specified RCS leakage detection instrumentation is found to be inoperable.	3.4.15 Required Action A.1	N/A

Table M - More Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.15 M.2	CTS 3.4.6.1 Action requires a grab sample of the containment atmosphere to be obtained and analyzed at least once per 24 hours when the required gaseous and/or particulate radioactivity monitoring channels are inoperable. Unit 1 ITS 3.4.15 Required Action B.1.1 requires the same requirement at a 12 hour Frequency when no containment atmosphere particulate radioactivity monitoring channels are OPERABLE. This changes the Unit 1 CTS by adding the requirement to analyze grab samples of the containment atmosphere every 12 hours instead of every 24 hours.	3.4.15 Required Action B.1.1 (Unit 1 only)	3.4.6.1 Action (Unit 1 only)
3/4.10.5 (Unit 1) and 3/4.10.4 (Unit 2) M.1	CTS 3/4.10.5 (Unit 1) and CTS 3/4.10.4 (Unit 2) provide an exception to the Reactor Coolant Loops and Coolant Circulation requirements in CTS 3/4.4.1.1 for the purpose of performance of PHYSICS TESTS and Thermal-Hydraulic Tests, provided the THERMAL POWER does not exceed the P-7 Interlock Setpoint, and the Reactor Trip Setpoints for the OPERABLE Intermediate Range, Neutron Flux and the Power Range, Neutron Flux, Low Setpoint are set at less than or equal to 25% of RATED THERMAL POWER. The ITS does not contain this special test exception. This changes the CTS by eliminating a special test exception.	N/A	3/4.10.5 (Unit 1), 3/4.10.4 (Unit 2)

Table M - More Restrictive Changes
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.2 M.1	CTS 3.5.2 Action a requires that when one inoperable ECCS subsystem is not restored to OPERABLE status within 72 hours, the unit must be in HOT SHUTDOWN within the next 12 hours. In addition to requiring the unit to be in MODE 4 within 12 hours (ITS 3.5.2 Required Action B.2) if the ECCS is not restored within the allowed Completion Time, ITS 3.5.2 Required Action B.1 also requires the unit to be in MODE 3 within 6 hours. This changes the CTS by requiring entry into MODE 3 within 6 hours when a shutdown is required.	3.5.2 Required Action B.1	3.5.2 Action a
3.5.3 M.1	CTS 3.5.3 Action b requires that when the required RHR subsystem is inoperable, the RHR subsystem must be restored to OPERABLE status or the RCS T_{avg} must be maintained < 350°F by use of alternate heat removal methods. The CTS does not provide any finite start time or completion time to perform the Action. ITS 3.5.3 ACTION A requires the immediate initiation of action to restore the required RHR train to OPERABLE status. This changes the CTS by specifically stating that action to restore the RHR train to OPERABLE status must be initiated immediately, and does not allow alternate decay heat methods to be used.	3.5.3 ACTION A	3.5.3 Action b
3.5.5 M.1	CTS 4.4.6.2.1.c provides a value for P_{si} of 2112 psig (low pressure operation) for Unit 1 and 2262 psig (high pressure operation) for Unit 1 and Unit 2 in the equation for determining seal line resistance. The ITS SR 3.5.5.1 Note states that the Surveillance is not required to be performed until 4 hours after the pressurizer pressure stabilizes at ≥ 2065 psig and ≤ 2105 psig (Unit 1) and ≥ 2215 psig and ≤ 2255 psig (Unit 2). In addition, CTS 4.4.6.2.1.c provides a pressure constant, P_{SI}, to be used in the calculation of seal line resistance. The values for this constant (two values for Unit 1 and one value for Unit 2), which are moved to the Bases as described in DOC LA.2, have been increased resulting in a decrease in the calculated seal line resistance flow at any given charging pump pressure. This changes the CTS by increasing the pressure constant value, resulting in a decrease in the calculated seal line resistance flow.	SR 3.5.5.1 Note	4.4.6.2.1.c
3.5.5 M.2	CTS 4.4.6.2.1.c states that the seal line resistance must be determined at least once per 31 days when the average pressurizer pressure is within 20 psi of its nominal full pressure value. CTS 4.4.6.2.1.c also states that the provisions of CTS 4.0.4 are not applicable for entry into MODES 3 and 4. ITS SR 3.5.5.1 requires verification that the seal injection flow resistance is ≥ 0.227 ft/gpm^2 and is modified by a Note that states the Surveillance is not required to be performed until 4 hours after the pressurizer pressure stabilizes at the specified pressure band. This changes the CTS by explicitly specifying the time required to perform the Surveillance after entering the specified pressure band.	SR 3.5.5.1 Note	4.4.6.2.1.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2 M.1	The CTS 3.6.1.3 Action requires restoration of an inoperable air lock within 24 hours. The ITS requires two additional Required Actions. When one or more containment air locks are inoperable for reasons other than Condition A or B, ITS 3.6.2 Required Action C.1 requires initiation of action to evaluate overall containment leakage rate per LCO 3.6.1 immediately and ITS 3.6.2 Required Action C.2 requires a door in the inoperable air lock to be closed within 1 hour. This changes the CTS by adding new Required Actions.	3.6.2 Required Actions C.1 and C.2	N/A
3.6.3 M.1	CTS 3.6.3.1 Action b allows 4 hours to isolate the affected penetration when one or more containment isolation valves are inoperable. ITS 3.6.3 Required Action B.1 will only allow 1 hour to isolate the affected penetration when both valves in the same penetration are inoperable. This changes the Unit 1 CTS by decreasing the time allowed to isolate the affected penetration when both containment isolation valves in the same penetration are inoperable.	3.6.3 Required Action B.1	3.6.3.1 Action b (Unit 1 only)
3.6.3 M.2	CTS 3.6.1.7 Action a allows 72 hours to isolate the affected penetration (by closing and deactivating an automatic containment purge valve) when one containment purge valve in a penetration is inoperable. ITS 3.6.3 ACTION A only allows 4 hours to isolate the affected penetration when one containment purge valve in a penetration is inoperable. This changes the CTS by decreasing the time allowed to isolate the affected penetration when one containment purge valve in the penetration is inoperable.	3.6.3 ACTION A	3.6.1.7 Action a
3.6.3 M.3	CTS 3/4.6.1.7 does not provide any specific testing requirements for the containment purge supply and exhaust valves, other than those required by CTS 3/4.6.1.2 and CTS 3/4.6.3.1. ITS SR 3.6.3.1 requires a 31 day verification that the containment purge valves are closed, except for certain allowed reasons (consistent with the stated reasons of CTS 3.6.1.7). This changes the CTS by requiring a new Surveillance verifying containment purge valve position.	SR 3.6.3.1	N/A
3.6.11 M.1	CTS 3.6.5.1.a and CTS 4.6.5.1.b.1 specify a lower limit ≥ 1800 ppm for stored ice boron concentration. ITS SR 3.6.11.6 specifies an upper and lower limit (≥ 1800 ppm and ≤ 2300 ppm) for stored boron concentration. This changes the CTS by adding an upper boron concentration limit for stored ice.	SR 3.6.11.6	LCO 3.6.5.1.a, 4.6.5.1.b.1
3.6.11 M.2	CTS 4.6.5.1.b.1 requires a chemical analyses to be performed on at least 9 representative samples of stored ice. ITS SR 3.6.11.6 requires a chemical analysis of the stored ice in at least one randomly selected ice basket from each ice condenser bay. This changes the CTS to require 24 samples (at least one randomly selected ice basket from each ice condenser bay) instead of requiring 9 representative samples.	SR 3.6.11.6	4.6.5.1.b.1
3.6.11 M.3	CTS 4.6.5.1 does not contain an explicit verification, by chemical analysis, that ice added to the ice condenser meets the boron concentration and pH requirements of CTS 3.6.5.1.a. ITS SR 3.6.11.7 requires this SR to be conducted during each ice addition. This changes the CTS by adding the ITS requirement of SR 3.6.11.7.	SR 3.6.11.7	N/A
3.6.12 M.1	The CTS 3.6.5.3 Action provides compensatory actions for one or more ice condenser doors open or otherwise inoperable. Power operation may continue for up to 14 days provided the ice bed temperature is monitored at least once per 4 hours and the maximum ice bed temperature is maintained less than or equal to 27°F. A new requirement has been added (ITS 3.6.12 ACTION A) that addresses inoperabilities associated with one or more ice condenser inlet doors that are physically restrained from opening. The new requirement only allows one hour to restore the inlet door to OPERABLE status. This changes the CTS by adding a more restrictive ACTION for inlet doors which are physically restrained from opening.	3.6.12 ACTION A	3.6.5.3 Action

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.14 M.1	CTS 4.6.5.8 requires the refueling canal drain be demonstrated OPERABLE prior to increasing the Reactor Coolant System temperature above 200°F after each partial or complete filling of the canal with water. ITS 3.6.14.1 adds a new Surveillance to verify by visual inspection, every 92 days and prior to entering MODE 4 from MODE 5 after each partial or complete fill of the canal, that there is no debris present in the upper compartment or refueling canal that could obstruct the required refueling canal drains. This changes the CTS by adding the additional Surveillance verification.	SR 3.6.14.1	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.1 M.1	CTS 3.7.1.1 Action a is applicable for MODES 1 and 2 with 4 reactor coolant loops and associated steam generators in operation and one or more MSSVs inoperable. The required compensatory actions are to either restore the valves to OPERABLE status or reduce the Power Range Neutron Flux - High Setpoint trip within 4 hours. If these actions cannot be met the unit must be in MODE 3 within the next 6 hours and comply with CTS 3.7.1.1 Action b. CTS 3.7.1.1 Action b is applicable in MODE 3 with a minimum of 3 reactor coolant loops and associated steam generators in operation and with one or more main steam line code safety valves associated with an operating loop inoperable. The compensatory measures provide an additional 4 hours to restore the valves to OPERABLE status or to trip the reactor trip breakers. If these actions cannot be met the unit must be in MODE 4 within the next 30 hours. ITS 3.7.1 ACTION A is applicable for one or more MSSVs during MODES 1, 2, and 3. ITS 3.7.1 Required Action A.1 requires a reduction in THERMAL POWER in 4 hours and a reduction in the Power Range Neutron Flux High Setpoint within 36 hours. ITS 3.7.1 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 in 12 hours if any Required Action and associated Completion Time is not met. This changes the CTS by modifying the Actions to delete their dependence on the MODE of Applicability, deleting the allowance to trip the reactor trip breakers, eliminating the additional time to restore or trip the reactor trip breakers in MODE 3 if CTS 3.7.1.1 Action b was entered from MODES 1 or 2, and reducing the time allowed to reached MODE 4.	3.7.1 ACTIONS A and B	3.7.1.1 Actions a and b
3.7.1 M.2	CTS 3.7.1.1 Actions a and b address the inoperabilities associated with four or five inoperable MSSVs associated with one or more steam generators and allow operation for up to 4 hours prior to requiring a unit shutdown. ITS 3.7.1 ACTION B states that if one or more steam generators have ≥ 4 MSSVs inoperable, the unit must be placed in MODE 3 within 6 hours and MODE 4 within 12 hours. This changes the CTS by deleting the allowance to operate for up to 4 hours for one or more steam generators with ≥ 4 MSSVs inoperable.	3.7.1.1 Actions a and b	3.7.1 second Condition of ACTION B
3.7.2 M.1	The CTS 3.7.1.5 Action for MODE 1 provides compensatory measures when one steam generator stop valve is inoperable "but open." ITS 3.7.2 ACTION A provides compensatory actions for when a steam generator stop valve is inoperable, regardless of whether the valve is open or closed. This changes the CTS by deleting the condition for entry into the action from "inoperable but open" to "inoperable."	3.7.2 Condition A	3.7.1.5 Action for MODE 1
3.7.2 M.2	The CTS does not require testing to verify that the SGSVs close on an actuation signal. ITS SR 3.7.2.2 requires verification that each SGSV actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by requiring verification that each SGSV actuates to the isolation position on an actual or simulated actuation signal.	SR 3.7.2.2	N/A
3.7.3 M.1	The CTS does not have any requirement for Main Feedwater Isolation Valves (MFIVs) and Main Feedwater Regulation Valves (MFRVs) to be OPERABLE, other than a CTS 3.3.2.1 requirement for an actuation signal to be supplied to the valves. ITS 3.7.3 requires the MFIVs and MFRVs to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by incorporating the requirements of ITS 3.7.3.	3.7.3	N/A
3.7.4 M.1	The CTS does not have any Technical Specification requirements for Steam Generator (SG) Power Operated Relief Valves (PORVs). ITS 3.7.4 specifies the requirements for the SG PORVs, consistent with the requirements of STS 3.7.4, "Atmospheric Dump Valves." This changes the CTS by incorporating the requirements of ITS 3.7.4.	3.7.4	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.5 M.1	CTS LCO 3.7.1.2.a is applicable in MODES 1, 2, and 3. ITS LCO 3.7.5 is applicable in MODES 1, 2, and 3, and MODE 4 when the steam generator is relied upon for heat removal. To support this change in the Applicability, the following additional requirements are added to the CTS: A Note is added to the LCO that requires only one AFW train, which includes a motor driven pump, to be OPERABLE in MODE 4; A new ACTION E is added which requires immediate action to restore a required inoperable AFW train to OPERABLE status when the steam generator (SG) is relied upon for heat removal in MODE 4; and CTS 4.7.1.2.a, b, c, and d, which are applicable in MODES 1, 2, and 3, are now applicable in MODE 4 when the SG is relied upon for heat removal (ITS SR 3.7.5.1 and SR 3.7.5.2) for the required AFW train.	3.7.5 LCO Note, 3.7.5 Applicability, 3.7.5 ACTION E, SR 3.7.5.1 and SR 3.7.5.2 for MODE 4	LCO 3.7.1.2.a, 3.7.1.2.a Applicability, 4.7.1.2.a, b, c, and d
3.7.5 M.2	CTS 4.7.1.2.d requires that each automatic valve of the AFW System in the flow path is in the correct position whenever the system is placed in automatic control or when above 10% RTP. This requirement is not applicable for those portions of the AFW System being used intermittently to maintain steam generator water level. ITS SR 3.7.5.1 also requires the automatic AFW valve position to be verified to be in the correct position. However, a Note has been added which allows the AFW train(s) to be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. This changes the CTS by requiring the AFW automatic valves to be in the correct position whenever the system is not being used for steam generator level control and by specifying the additional requirement that the AFW train(s) must be capable of being manually realigned to the AFW mode of operation.	SR 3.7.5.1 (including Note)	4.7.1.2.d
3.7.6 M.1	CTS 3.7.1.3 requires the CST to be OPERABLE with a minimum contained volume of 175,000 gallons of water. ITS LCO 3.7.6 requires the CST to be OPERABLE and ITS SR 3.7.6.1 requires the CST volume to be verified to be ≥ 182,000 gallons. This changes the CTS by increasing the CST volume requirements.	LCO 3.7.6, SR 3.7.6.1	LCO 3.7.1.3
3.7.6 M.2	The CTS requirements on the CST are applicable in MODES 1, 2, and 3. ITS 3.7.6 is applicable in MODES 1, 2, and 3, and in addition, MODE 4 when a steam generator is relied upon for heat removal. Consistent with this change in Applicability, the requirement to be in MODE 4 "without reliance on steam generator for heat removal" is added as indicated in ITS 3.7.6 Required Action B.2. This changes the CTS requirements by requiring the CST to be OPERABLE in MODE 4 when a SG is relied upon for heat removal.	3.7.6 Applicability, 3.7.6 Required Action B.2	3.7.1.3 Applicability
3.7.7 M.1	The Action for CTS 3.7.3.1.a allows 72 hours to restore an inoperable CCW loop to OPERABLE status. ITS 3.7.7 ACTION A has this same requirement, however a Note has been included. The ITS 3.7.7 Required Action A.1 Note requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by CCW. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.4.6 must be entered.	3.7.7 Required Action A.1 Note	N/A
3.7.7 M.2	CTS 4.7.3.1 does not contain a requirement to verify each CCW System pump starts automatically on an actuation signal. ITS SR 3.7.7.3 states "Verify each CCW pump starts automatically on an actual or simulated actuation signal." This changes the CTS by adding a Surveillance Requirement to test the CCW System pumps.	SR 3.7.7.3	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.8 M.1	The Action for CTS 3.7.4.1.a allows 72 hours to restore an inoperable ESW loop to OPERABLE status. ITS 3.7.8 ACTION A has this same requirement, however two additional Notes have been included. ITS 3.7.8 Required Action A.1 Note 1 requires entry into the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources - Operating," for any emergency diesel generator made inoperable by ESW, while ITS 3.7.8 Required Action A.1 Note 2 requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops – MODE 4," for residual heat removal loops made inoperable by ESW. This changes the CTS by explicitly specifying the applicable Conditions and Required Actions of ITS LCO 3.8.1 and LCO 3.4.6 must be entered.	3.7.8 Required Action A.1 Notes 1 and 2	N/A
3.7.8 M.2	CTS 4.7.4.1 does not contain a requirement to verify each ESW System pump starts automatically on an actuation signal. ITS SR 3.7.8.3 states, "Verify each ESW pump starts automatically on an actual or simulated actuation signal." This changes the CTS by adding a Surveillance Requirement to test the ESW System pumps.	SR 3.7.8.3	N/A
3.7.8 M.3	CTS 3.7.4.1 Action b states that with the opposite unit in MODE 1, 2, 3, or 4 and any unit ESW pump inoperable, at least one crosstie valve on the associated header must be closed within 1 hour or the opposite unit ESW train must be declared inoperable and the appropriate action in the opposite unit's CTS 3.7.4.1 must be taken. The ITS does not include the allowance to delay declaring inoperable the opposite unit ESW train for 1 hour. ITS 3.7.8 requires an immediate declaration of inoperability of the opposite unit ESW train and to immediately take the Actions required by ITS 3.7.8 ACTION A. This changes the CTS by deleting the 1 hour allowance to delay declaring inoperable the opposite unit ESW train.	N/A	3.7.4.1 Action b
3.7.9 M.1	The CTS does not have any requirement for the Ultimate Heat Sink (UHS) to be OPERABLE. ITS 3.7.9 requires the UHS to be OPERABLE in MODES 1, 2, 3, and 4. This changes the CTS by incorporating the requirements of ITS 3.7.9.	3.7.9	N/A
3.7.10 M.1	CTS 4.7.5.1.e.3 requires the verification that the system maintains the control room envelope/pressure boundary at a positive pressure of greater than or equal to 1/16 inch W.G. relative to the outside atmosphere at a system flow rate of 6000 cfm plus or minus 10%, with a makeup air flow rate ≤ 1000 cfm every 18 months. ITS SR 3.7.10.4 requires the verification that each CREV train can maintain a positive pressure of ≥ 0.0625 inches water gauge, relative to the outside atmosphere during the pressurization/cleanup mode of operation at a makeup flow rate of ≤ 1000 cfm every 24 months on a STAGGERED TEST BASIS. This changes the CTS by requiring both trains to be tested in the course of 48 months, as represented by the STAGGERED TEST BASIS requirement of the 24 month Frequency. Other changes to this requirement are discussed in DOC L.2 and LA.5.	SR 3.7.10.4	4.7.5.1.e.3
3.7.11 M.1	The CTS does not have any requirements for the CRAC System during movement of irradiated fuel assemblies. ITS 3.7.11 Applicability includes "During movement of irradiated fuel assemblies." ITS 3.7.11 ACTIONS A, C, and D provide compensatory measures when CRAC train(s) are inoperable. This changes CTS by adding an additional Applicability criteria and associated ACTIONS.	3.7.11 Applicability, 3.7.11 ACTIONS A, C, and D	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.11 M.2	CTS 4.7.5.2 states "The control room air conditioning system shall be demonstrated OPERABLE at least once per 12 hours by verifying that the control room air temperature is less than or equal to 95°F." However, the CTS does not preclude the Surveillance from being performed with both control room air conditioning (CRAC) trains in operation, nor does the CTS require this verification for each of the control room air conditioning (CRAC) trains; the CTS Surveillance can be satisfied regardless of how many CRAC trains are in operation. ITS SR 3.7.11.1 requires the 12 hour Surveillance to be performed using only one of the two CRAC trains in operation, and requires the temperature to be ≤ 85°F. ITS SR 3.7.11.2 requires verification that each CRAC train can maintain control room air temperature ≤ 85°F every 31 days. This changes CTS by ensuring only one CRAC train is in operation and changing the temperature limit from 95°F to 85°F during the 12 hour Surveillance, and adding a specific requirement to verify that each CRAC train can maintain control room air temperature ≤ 85°F every 31 days.	SR 3.7.11.1, SR 3.7.11.2	4.7.5.2
3.7.12 M.1	ITS SR 3.7.12.4 states "Verify one ESF Ventilation train can maintain a negative pressure relative to adjacent areas during the post accident mode of operation at a flow rate of ≤ 22,500 cfm." The Frequency is 24 months on a STAGGERED TEST BASIS. ITS LCO 3.7.12 includes a Note that states "The ESF enclosure boundary may be opened intermittently under administrative control." ITS 3.7.12 ACTION B requires that when two ESF Ventilation trains are inoperable due to an inoperable ESF enclosure boundary, that the ESF enclosure boundary be restored to OPERABLE status within 24 hours. This changes CTS by adding a requirement that equipment be able to provide a negative pressure relative to adjacent areas inside the ESF enclosure boundary. The ITS LCO 3.7.12 Note allows an exception to the requirements of ITS SR 3.7.12.4. ITS 3.7.12 ACTION B provides a 24 hour Completion Time in case two ESF Ventilation trains are inoperable due to an inoperable ESF enclosure boundary.	LCO 3.7.12 Note, 3.7.12 ACTION B	N/A
3.7.13 M.1	CTS LCO 3.9.12 requires the spent fuel storage pool exhaust ventilation system to be OPERABLE. CTS 3.9.12 Action a specifies the requirements when no spent fuel storage pool exhaust ventilation system is OPERABLE. CTS 4.9.12.d.3 requires verification that the spent fuel storage pool exhaust ventilation system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans. ITS 3.7.13 requires one FHAEV train to be OPERABLE "and in operation." ITS 3.7.13 ACTION A specifies the compensatory actions for a required FHAEV train that is not in operation. ITS SR 3.7.13.1 requires the verification that the required FHAEV train is operating every 12 hours. ITS SR 3.7.13.4 requires verification that the required FHAEV train actuates on an actual or simulated actuation signal. This changes the CTS by adding the requirement that the required FHAEV train must be in operation, adds an ACTION to take if the required FHAEV train is not in operation (ITS 3.7.13 ACTION A), adds a new Surveillance Requirement to periodically verify the required FHAEV train is in operation, and deletes a Surveillance Requirement to verify the train automatically directs its exhaust flow through the charcoal adsorber banks on an actuation signal.	LCO 3.7.13, 3.7.13 ACTION A, SR 3.7.13.1, SR 3.7.13.4	LCO 3.9.12, 3.9.12 Action a, 4.9.12.d.3
3.7.13 M.2	CTS 4.9.12.d.4 requires the verification that the FHAEV System maintains the spent fuel storage pool area at a negative pressure of greater than or equal to 1/8 inch W.G. relative to the outside atmosphere during system operation. ITS SR 3.7.13.5 requires the verification that one FHAEV fan can maintain a pressure of > 0.125 inches of vacuum water gauge with respect to atmospheric pressure during the accident mode of operation at a flow rate of ≤ 27,000 cfm. This changes the CTS by adding the flow rate at which the test must be performed.	SR 3.7.13.5	4.9.12.d.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.7.16 M.1	The CTS does not provide a Surveillance Requirement for spent fuel storage. ITS SR 3.7.16.1 requires a verification by administrative means that the initial enrichment and burnup of the fuel assembly is in accordance with the criteria of ITS Table 3.7.16-1 prior to storing any fuel assembly in Region 2 or 3 of the spent fuel storage pool. This changes the CTS by incorporating the requirements of ITS SR 3.7.16.1.	SR 3.7.16.1	N/A
3.7.17 M.1	CTS Table 4.7-2 Item 2 requires the DOSE EQUIVALENT I-131 sampling frequency to be once per 31 days whenever the gross activity determination indicates iodine concentration greater than 10% of the allowable limit. CTS Table 4.7-2 Item 2 allows the sampling frequency for the DOSE EQUIVALENT I-131 to be extended to once per 6 months whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limits. ITS SR 3.7.17.1 does not provide this extended time frame for determining the DOSE EQUIVALENT I-131 and requires verification of specific activity of the secondary coolant every 31 days. This changes the CTS by deleting CTS Table 4.7-2 Item 2.b and the qualifying statement of "whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit" in Item 2.a, and keeping the Frequency at 31 days all the time.	SR 3.7.17.1	4.7.1.4, Table 4.7-2 Item 2

Table M - More Restrictive Changes
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.1	CTS 4.8.1.1.2.e.3 requires a verification that the DG is capable of rejecting a load of 3500 kW without exceeding 75% of the difference between nominal speed and the overspeed trip setpoint. ITS SR 3.8.1.11 requires verification that each DG does not trip and voltage is maintained ≤ 5000 V during and following a load rejection of ≥ 3150 kW and ≤ 3500 kW. This changes the CTS by adding a DG voltage limitation to the full load reject test. The change to the load range is discussed in DOC L.6 and the change to the speed limitation is discussed in DOC L.10.	SR 3.8.1.11	4.8.1.1.2.e.3
3.8.1 M.2	CTS 3.8.1.1 does not contain any explicit Action requirements for the opposite unit qualified circuits and DGs when these AC Sources are inoperable but are required to support the ESW System. CTS LCO 3.0.5 would allow the ESW System not to be declared inoperable as long as its normal or emergency power source is OPERABLE and all of its redundant support equipment are OPERABLE. ITS 3.8.1 ACTIONS A and B have been added to cover the situation when the opposite unit qualified offsite circuit or DG is inoperable, respectively. ITS 3.8.1 Required Action A.3 will require the offsite circuit to be restored to OPERABLE status within 72 hours while ITS 3.8.1 Required Action B.4 will require the inoperable DG to be restored to OPERABLE status within 72 hours. ITS 3.8.1 Required Actions B.3.1 and B.3.2 require a determination that the OPERABLE DG(s) is not inoperable due to common cause failure or to perform a DG start for each OPERABLE DG. In addition, a Note has been added to the Applicability which allows the opposite unit AC electrical power sources required by LCO 3.8.1.c and LCO 3.8.1.d to not be required to be OPERABLE when the associated equipment is inoperable. This change adds additional compensatory actions for the inoperable opposite unit AC Sources.	3.8.1 Applicability Note, 3.8.1 ACTIONS A and B	N/A
3.8.1 M.3	CTS 3.8.1.1 Action d specifies the compensatory actions for two inoperable offsite circuits. The action requires restoration of at least one of these sources, and if not restored within the allowed time, the unit is required to be in at least HOT STANDBY within the next 6 hours. In the ITS, if at least one offsite circuit is not restored to OPERABLE status within the allowed time, then ITS 3.8.1 ACTION F requires the unit to be in MODE 3 within 6 hours and MODE 5 within 36 hours. This changes the CTS by adding the requirement to be in MODE 5 within 36 hours.	3.8.1 Required Action F.2	N/A
3.8.1 M.4	CTS 4.8.1.1.2.a.3 requires the verification that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank. ITS SR 3.8.1.7 requires verification that each fuel oil transfer system operates to "automatically" transfer fuel oil from the storage tank to the day tank. This changes the CTS by adding a requirement that the fuel oil transfer system must operate automatically.	SR 3.8.1.7	4.8.1.1.2.a.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.5	CTS 4.8.1.1.2.a.4, the normal DG start test, requires a verification that each DG starts from standby conditions and achieves in less than or equal to 10 seconds, a voltage of 4160 ± 420 V and a frequency of 60 ± 1.2 Hz. CTS 4.8.1.1.2.a.4 footnote * clarifies that the DG start (10 seconds) from standby conditions shall be performed at least once per 184 days in these surveillance tests. All other engine starts for the purpose of this Surveillance testing and compensatory action may be at reduced acceleration rates as recommended by the manufacturer so that mechanical stress and wear on the DG are minimized. CTS 4.8.1.1.2.e.2, the single largest load reject test, requires the verification of the generator capability to reject a load greater than or equal to the specified value while maintaining voltage at 4160 ± 420 V and frequency of 60 ± 1.2 Hz. CTS 4.8.1.1.2.e.4, the simulated loss of offsite power test, and CTS 4.8.1.1.2.e.6, the simulated loss of offsite power test in conjunction with a Safety Injection signal test, also specify a steady state voltage of 4160 ± 420 V and frequency of 60 ± 1.2 Hz. CTS 4.8.1.1.2.e.7 requires the performance of CTS 4.8.1.1.2.a.4 within 5 minutes after performing the 8 hour test (commonly called a hot restart test). CTS 4.8.1.1.2.a.4 is divided into three Surveillances in the ITS. ITS SR 3.8.1.2 requires the verification that each DG starts from standby conditions and achieves steady state voltage of ≥ 3910 V and ≤ 4400 V and frequency of ≥ 59.4 Hz and ≤ 61.2 Hz. ITS SR 3.8.1.2 Note 2 specifies that the modified DG start involving gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. ITS SR 3.8.1.8, the 184 day quickstart test, and SR 3.8.1.16, the 24 month hot restart test, require a steady state voltage of ≥ 3910 V and ≤ 4400 V and a steady state frequency of ≥ 59.4 Hz and ≤ 61.2 Hz. ITS SR 3.8.1.10, the single largest load reject test, requires the verification that within 2 seconds following load rejection voltage is ≥ 3910 V and ≤ 4400 V and frequency is ≥ 59.4 Hz and ≤ 61.2 Hz. ITS SR 3.8.1.12, the loss of offsite power test, and SR 3.8.1.19 the loss of offsite power test in conjunction with an ESF signal, also require verification of the same limitations for steady state voltage and frequency. This changes the CTS in that the steady state voltage range has been reduced from 4160 ± 420 V to 4160 +240 V, -250 V and the steady state frequency range has been reduced from 60 ± 1.2 Hz to 60 + 1.2 Hz, - 0.6 Hz. The deletion of the maximum voltage and frequency limit for the quick start tests are described in DOC L.18.	SR 3.8.1.2 (including Note 2), SR 3.8.1.8, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.16, SR 3.8.1.19	4.8.1.1.2.a.4, 4.8.1.1.2.e.2, 4.8.1.1.2.e.4, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7
3.8.1 M.6	CTS 3/4.8.1.1 does not specify any requirements for the DG air start receiver pressure. ITS SR 3.8.1.6 requires verification that each required DG air start receiver pressure is ≥ 190 psig every 31 days. This changes the CTS by adding a new Surveillance to the Technical Specifications that is not currently required.	SR 3.8.1.6	N/A
3.8.1 M.7	CTS 4.8.1.1.2.a.5 requires each DG to be synchronized and loaded for ≥ 60 minutes. ITS SR 3.8.1.3 requires the same test, however two additional Notes have been added which place restrictions on the test. Notes 3 and 4 modify the CTS requirements by stating that the SR shall be conducted on only one DG at a time, and the SR shall be preceded by and immediately follow, without a shutdown of the DG, a successful performance of ITS SR 3.8.1.2 or ITS SR 3.8.1.8. This changes the CTS by adding restrictions when performing this test.	SR 3.8.1.3 Notes 3 and 4	4.8.1.1.2.a.5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 M.8	CTS 4.8.1.1.2.e.2 requires the testing of a DG with the loss of a load ≥ 600 kW while CTS 4.8.1.1.2.e.3 requires the testing of DG with a loss of load of 3500 kW. These Surveillances do not specify that a DG shall be tested at a specific power factor. ITS SR 3.8.1.10 requires the verification that each DG can reject a load equal to or greater than its associated single largest post-accident load. ITS SR 3.8.1.11 requires the verification that each DG can reject a load of ≥ 3150 kW and ≤ 3500 kW. The SRs additionally state in a Note "If performed with DG synchronized with offsite power, it shall be performed at a power factor ≤ 0.86. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable." This changes the CTS requirement by specifying a power factor of ≤ 0.86 if the testing is conducted by synchronizing with the offsite sources. Other changes to CTS 4.8.1.1.2.e.2 (ITS SR 3.8.1.10) are discussed in DOCs M.5, LA.4, and L.9, while other changes to CTS 4.8.1.1.2.e.3 (ITS SR 3.8.1.1.11) are discussed in DOCs L.6 and L.10.	SR 3.8.1.10 Note 2, SR 3.8.1.11 Note 2	4.8.1.1.2.e.2, 4.8.1.1.2.e.3
3.8.1 M.9	CTS 4.8.1.1.2.e.5, the Safety Injection actuation test (without a loss of power) requires the DG to start and operate for greater than or equal to 5 minutes. ITS SR 3.8.1.13 requires the verification that each DG auto-start from standby condition and; a) in ≤ 10 seconds the DG achieves voltage ≥ 3740 V and frequency ≥ 58.8 Hz; b) achieves steady state voltage ≥ 3910 V and ≤ 4400 V and frequency ≥ 59.4 Hz and ≤ 61.2 Hz; c) operates for ≥ 5 minutes; d) permanently connected loads remain energized from the offsite power system; and e) emergency loads are auto-connected through the time delay relays, where applicable, from the offsite power system. This changes the CTS by adding additional performance requirements for the Safety Injection actuation test (without a loss of power).	SR 3.8.1.13	4.8.1.1.2.e.5
3.8.1 M.10	CTS 4.8.1.1.2.f.3) requires, at least every 10 years, that both DGs are started simultaneously with a verification that both DGs start and accelerate to at least 514 RPM in less than or equal to 10 seconds. ITS SR 3.8.1.22 requires verification when started simultaneously from standby condition that each DG achieves, in ≤ 10 seconds, voltage ≥ 3740 V and frequency ≥ 58.8 Hz. This changes the CTS by placing a minimum voltage limit for the DGs during this test. The change to the speed limit is discussed in DOC L.15.	SR 3.8.1.22	4.8.1.1.2.f.3)
3.8.1 M.11	CTS LCO 3.8.1.1 does not contain any explicit LCO or Surveillance Requirements for the opposite unit qualified circuits and DGs when these AC Sources are required to support the ESW System. The opposite unit LCO requirements have been added as discussed in DOC A.2. ITS SR 3.8.1.23 has been added, and states which SRs of the opposite unit Specification 3.8.1 apply for the required opposite unit AC Sources. In addition, SR Table Notes 1 and 2 have been added to clarify which Surveillances are applicable to the given unit and which Surveillances are applicable to the opposite unit. SR Note 1 states that SR 3.8.1.1 through SR 3.8.1.22 apply to the given unit and SR Note 2 states that SR 3.8.1.23 is applicable to the opposite unit AC Sources. This changes the CTS by adding explicit Surveillances for the opposite unit required equipment.	SR Table Notes 1 and 2, SR 3.8.1.24	N/A
3.8.1 M.12	CTS LCO 3.8.1 does not contain any explicit LCO or Surveillance requirements for verifying, when the DG is operating in test mode and connected to its emergency buses, that an actual or simulated Safety Injection Signal will override the test mode. ITS SR 3.8.1.21 has been added to perform this Surveillance requirement. Additionally, a note has been added stating that the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. It also states that portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. Furthermore, it allows credit to be taken for unplanned events that this satisfy the SR.	SR 3.8.1.21	LCO 3.8.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.2 M.1	CTS 3.8.1.2.a requires one circuit between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE. ITS LCO 3.8.2.a requires one qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown," to be OPERABLE. This changes the CTS by being specific as to what the required circuit must be capable of powering.	LCO 3.8.2.a	LCO 3.8.1.2.a
3.8.2 M.2	CTS 3.8.1.2.b requires one DG to be OPERABLE. ITS LCO 3.8.2.b requires one DG capable of supplying one train of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.10. This changes the CTS by being specific as to what the required DG must be capable of powering.	LCO 3.8.2.b	LCO 3.8.1.2.b
3.8.2 M.3	CTS 3.8.1.2 is applicable during MODES 5 and 6. ITS 3.8.2 is applicable in MODES 5 and 6, and during the movement of irradiated fuel assemblies in the containment, auxiliary building, and Unit 2 (Unit 1) and Unit 1 (Unit 2) containment. ITS 3.8.2 Required Action A.2.2 (for an inoperable required offsite circuit) and ITS 3.8.2 Required Action B.2 (for an inoperable required DG) requires the immediate suspension of movement of irradiated fuel assemblies. In addition, a Note has been added to the ACTIONS of ITS 3.8.2 which states that LCO 3.0.3 is not applicable. This changes the CTS by requiring the AC Sources to be OPERABLE under more conditions and provides additional compensatory actions when the LCO requirements are not met.	3.8.2 Applicability, 3.8.2 ACTIONS Note, 3.8.2 Required Actions A.2.2 and B.2	3.8.1.2 Applicability
3.8.2 M.4	The CTS 3.8.1.2 Action requires the suspension of CORE ALTERATIONS and certain positive reactivity changes when a required AC Source is inoperable. It does not include an action to restore the inoperable AC Source or to exit the Applicability of the Specification. ITS 3.8.2 Required Actions A.2.4 and B.4 require the immediate initiation of action to restore the required AC Source to OPERABLE status. This changes the CTS by adding explicit Required Actions to restore the inoperable AC Source to OPERABLE status.	3.8.2 Required Actions A.2.4 and B.4	3.8.1.2 Action
3.8.2 M.5	Unit 2 CTS 3.8.1.2.a requires one circuit between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE and Unit 2 CTS 3.8.1.2.b requires one DG to be OPERABLE. These two required AC Sources are Unit 2 sources. Unit 2 CTS 3.9.12 requires the Fuel Handling Area Exhaust Ventilation (FHAEV) System (which is powered from Unit 1 AC Sources) to be OPERABLE whenever irradiated fuel is in the storage pool. The Unit 2 CTS definition of "OPERABLE - OPERABILITY" includes both a normal and emergency electrical power source requirement. However, there are no specific requirements in Unit 2 CTS 3.8.1.2 requiring the testing of the Unit 1 AC Sources that support the FHAEV System. Unit 2 ITS LCO 3.8.2.c requires one Unit 1 qualified circuit between the offsite transmission network and the Unit 1 onsite Class 1E AC electrical power distribution subsystem required by LCO 3.8.10. This change is discussed in DOC A.4. An explicit SR (ITS SR 3.8.2.1) has been added which requires the applicable SRs of ITS 3.8.1, "AC Sources - Operating," to be applicable to each AC source required to be OPERABLE. This changes the Unit 2 CTS by explicitly requiring Surveillance Requirements for the Unit 1 AC Source required to be OPERABLE to support Unit 2 operation.	SR 3.8.2.1 (Unit 2 only)	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 M.1	CTS 4.8.1.1.2.c and CTS 4.8.1.1.2.d specify the requirements for the properties of new and stored fuel oil, respectively. CTS 4.8.1.1.2.c footnote *** and CTS 4.8.1.1.2.d footnote * state that the actions to be taken should any of the properties be found outside of specified limits are defined in the Bases. The requirements in CTS 4.8.1.1.2.c.1), 2), and 3) apply to properties associated with the new fuel oil. The properties must be met before adding the new fuel to the storage tank. There are no actions specified in the Bases for these properties since the new fuel will not be added to the storage tank unless these properties are within limits. CTS 4.8.1.1.2.c.4) applies to the new fuel oil properties which must be evaluated within 31 days after the fuel is added to the storage tank. The CTS 3/4.8 Bases provides the following guidance and actions for CTS 4.8.1.1.2.c.4): a) The sample specified in CTS 4.8.1.1.2.c.4) is sent offsite for testing; b) A serious attempt will be made to meet the 31 day limit on the offsite tests; however, if for reason this limit is not met (e.g., if the sample is lost or broken or if the results are not received in 31 days), the DGs should not be considered inoperable; c) If the sample is lost, broken, or fails the offsite tests and the new oil has already been put into the storage tank, the offsite tests will be performed on a sample taken from the storage tank; and d) If the results on the subsequent storage tank sample are not within specified limits, the DGs should be considered OPERABLE and the out-of-spec properties should be returned to within specification as soon as possible. CTS 4.8.1.1.2.d applies to particulate contamination of the fuel in the storage tank. The CTS 3/4.8 Bases provides the following guidance and actions for CTS 4.8.1.1.2.d. If the monthly storage tank sample taken fails the particulate contamination test, the DG should be considered inoperable and the contamination level should be restored to below 10 mg/liter as soon as possible. ITS 3.8.3 ACTION B specifies the compensatory actions for one or more DG with stored fuel oil total particulates not within limits. ITS 3.8.3 Required Action B.1 requires the restoration of the fuel oil total particulates to within limits in 7 days. ITS 3.8.3 ACTION C specifies the compensatory actions for one or more DGs with new fuel oil properties not within limits. ITS 3.8.3 Required Action C.1 requires the restoration of the stored fuel oil properties to within limits within 30 days. This changes the CTS by providing explicit ACTIONS for fuel oil total particulates and new fuel oil properties limits not met.	3.8.3 ACTIONS B and C	4.8.1.1.2.c footnote ***, 4.8.1.1.2.d footnote *

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.4 M.1	CTS 4.8.2.3.2 specifies the DC Source Surveillance requirements associated with the given unit. It does not explicitly specify the Surveillance Requirements for the DC Sources associated with the opposite unit. CTS LCO 3.7.4.1 requires two independent essential service water loops to be OPERABLE. The CTS 3/4.7.4 Bases state that the LCO also ensures that an inoperable opposite unit ESW pump does not result in flow being diverted from an OPERABLE unit ESW pump sharing the same header. Therefore, if the header between the two units is not isolated, both ESW pumps on the same header support both units. The CTS definition of OPERABLE - OPERABILITY requires all attendant equipment (including both the normal and emergency electrical power sources) to be capable of performing its required function. However, there are no specific requirements in the CTS requiring testing of the opposite unit DC Sources. ITS LCO 3.8.4.c requires opposite unit Train A and Train B 250 VDC electrical power subsystem(s) capable of supplying the opposite unit ESW components required by LCO 3.7.8, "Essential Service Water (ESW) System," to be OPERABLE. This change is discussed in DOC A.2. An explicit Surveillance Requirement has been added (ITS SR 3.8.4.4) that requires certain Surveillance Requirements to be met for the opposite Unit 250 VDC Sources. This Surveillance specifies that the opposite unit Train A and Train B 250 VDC electrical power subsystem SRs are applicable. Two Notes have been added to the Surveillance Table to clarify which Surveillances apply to the unit DC Sources and which are applicable to the opposite unit DC Sources. This changes the CTS by adding explicit Surveillance Requirements for these opposite Unit 250 VDC Sources.	SR 3.8.4.4	N/A
3.8.5 M.1	CTS LCO 3.8.2.4 requires one 250 VDC battery bank and charger associated with the specified 250 VDC bus to be OPERABLE. ITS LCO 3.8.5 requires the Train A or Train B 250 VDC electrical power subsystem to be OPERABLE to support one train of the DC Electrical Power Distribution System required by LCO 3.8.10, "Distribution Systems - Shutdown." This changes the CTS by being specific as to what the required DC electrical power subsystem must be powering.	LCO 3.8.5	LCO 3.8.2.4
3.8.6 M.1	CTS 4.8.2.3.2 specifies the Surveillances for the Trains A and B 250 VDC batteries while the unit is operating and CTS 4.8.2.4.2 specifies the Surveillances for the Trains A and B 250 VDC batteries during shutdown. CTS 4.8.2.5.2 specifies the Surveillances for the Train N 250 VDC battery. ITS 3.8.6 adds two new Surveillances. ITS SR 3.8.6.1 requires the verification every 7 days that each battery float current is ≤ 2 amps. ITS SR 3.8.6.4 requires the verification every 31 days that each battery pilot cell temperature is greater than or equal to the minimum established design limits. This changes the CTS by adding explicit Surveillances for battery float current and pilot cell temperature.	SR 3.8.6.1, SR 3.8.6.4	N/A
3.8.6 M.2	CTS 4.8.2.3.2.b.3 and CTS 4.8.2.5.2.b.3 require verification that electrolyte level of each battery connected cell be within limit every 92 days. ITS SR 3.8.6.3 requires verification of each battery connected cell electrolyte level is greater than or equal to the established limit every 31 days. This changes the CTS by increasing the Frequency of performance of the Surveillances from 92 days to 31 days.	SR 3.8.6.3	4.8.2.3.2.b.3, 4.8.2.5.2.b.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.7 M.1	The CTS 3.8.2.1 Action specifies the compensatory actions for one or more inoperable 120 VAC inverters. The compensatory action is to restore the inoperable inverters to OPERABLE status within 8 hours. ITS 3.8.7 ACTION A covers the condition of one inoperable Train A or Train B inverter. ITS 3.8.7 ACTION A requires the restoration of the inoperable inverter to OPERABLE status within 24 hours. ITS 3.8.7 ACTION B covers the condition of two inverters in one train inoperable, and requires restoration of one inverter to OPERABLE status within 6 hours. This changes the CTS by: a) requiring one inverter to be restored to OPERABLE status within 6 hours instead of 8 hours when two inverters are inoperable in the same train; and b) requiring entry into LCO 3.0.3 with two or more inverters in different trains inoperable. The change covering the extension in time for restoration of one inoperable inverter is discussed in DOC L.1.	3.8.7 ACTION B	3.8.2.1 Action
3.8.7 M.2	CTS 4.8.2.1 requires the specified AC buses to be determined OPERABLE every 7 days and energized by verifying correct breaker alignment and indicated power availability. ITS SR 3.8.7.1 requires the verification of correct inverter voltage, frequency, and alignment to the associated 120 VAC vital buses every 7 days. This changes the CTS by requiring the specific verification of the inverter voltage and frequency every 7 days.	SR 3.8.7.1	4.8.2.1
3.8.8 M.1	CTS 4.8.2.2 requires the specified 120 VAC vital buses to be determined OPERABLE every 7 days and energized by verifying correct breaker alignment and indicated power availability. ITS SR 3.8.8.1 requires the verification of correct required voltage, frequency, and alignment to the associated 120 VAC vital bus every 7 days. This changes the CTS by requiring the specific verification of the inverter voltage and frequency every 7 days.	SR 3.8.8.1	4.8.2.2
3.8.9 M.1	CTS 3.8.2.1 Action states that with less than the above complement of AC buses OPERABLE, to restore the inoperable bus to OPERABLE status within 8 hours. CTS 3.8.2.3 Action a states that with one 250 VDC bus inoperable, to restore the inoperable bus to OPERABLE status within 2 hours. ITS 3.8.9 ACTION A covers the situation when one or both Train A and Train B AC electrical power distribution subsystems are inoperable. ITS 3.8.9 Required Action A.1 allows 8 hours and 16 hours from discovery of failure to meet LCO 3.8.9.a, b, or c to restore the Train A and Train B AC electrical power distribution subsystem(s) to OPERABLE status. ITS 3.8.9 ACTION B covers the situation when one or both Train A and Train B 120 VAC vital electrical power distribution subsystems are inoperable. ITS 3.8.9 Required Action B.1 allows 8 hours and 16 hours from discovery of failure to meet LCO 3.8.9.a, b, or c to restore the Train A and Train B 120 VAC vital electrical power distribution subsystem(s) to OPERABLE status. ITS 3.8.9 ACTION C covers the situation when one or both Train A and Train B 250 VDC electrical power distribution subsystems are inoperable. ITS 3.8.9 Required Action C.1 allows 2 hours and 16 hours from discovery of failure to meet LCO 3.8.9.a, b, or c to restore the Train A and Train B 250 VDC electrical power distribution subsystem(s) to OPERABLE status. This changes the CTS by establishing a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.9.a, b, and c to be inoperable during any single contiguous occurrence of failing to meet the LCO.	3.8.9 Required Actions A.1, B.1, and C.1	3.8.2.1 Action, 3.8.2.3 Action a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.9 M.2	CTS 3.8.2.1 Action states that with less than the above complement of AC buses OPERABLE, to restore the inoperable bus to OPERABLE status within 8 hours. CTS 3.8.2.3 Action a states that with one 250 VDC bus inoperable, to restore the inoperable bus to OPERABLE status within 2 hours. CTS 3.8.2.5 Action states that with the Train N battery system inoperable, to declare the turbine driven auxiliary feedwater pump inoperable. However, there are no limitations to preclude a loss of function due to numerous concurrently inoperable AC and DC buses. ITS 3.8.9 ACTION G has been added, requiring entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems results in a loss of safety function.	3.8.9 ACTION G	N/A
3.8.9 M.3	CTS 4.8.2.1 states the specified AC buses shall be determined OPERABLE by verifying correct breaker alignment and "indicated power availability." CTS 4.8.2.3.1 states that each DC bus train shall be demonstrated OPERABLE by verifying correct breaker alignment and "indicated power availability." CTS 4.8.2.5.1 states that the DC bus Train N shall be determined OPERABLE by verifying correct breaker alignment and "indicated power availability." ITS SR 3.8.9.1 requires the verification of correct breaker alignments and "voltage" to required AC, DC, and 120 VAC vital bus electrical power distribution subsystems. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and 120 VAC vital bus electrical power distribution subsystems, whereas the CTS only requires verification of indicated power.	SR 3.8.9.1	4.8.2.1, 4.8.2.3.1, 4.8.2.5.1
3.8.9 M.4	CTS 3.8.2.1 only specifies the AC electrical power distribution subsystem requirements for the given unit. It does not explicitly specify the requirements for the AC electrical power distribution subsystem requirements associated with the opposite unit. CTS 3.8.2.3 only specifies the DC electrical power distribution system requirements for the given unit. It does not explicitly specify the requirements for the DC electrical power distribution subsystem requirements associated with the opposite unit. CTS LCO 3.7.4.1 requires two independent essential service water (ESW) loops to be OPERABLE. The CTS 3/4.7.4 Bases state that the LCO also ensures that an inoperable opposite unit ESW pump does not result in flow being diverted from an OPERABLE unit ESW pump sharing the same header. Therefore, if the header between the two units is not isolated, both ESW pumps on the same header support both units. The CTS definition of OPERABLE - OPERABILITY requires all attendant equipment to be capable of performing its required function, which includes electrical power distribution subsystems. However, there are no specific requirements in the CTS requiring the testing of the opposite unit electrical power distribution subsystems. ITS LCO 3.8.9.e requires the opposite unit Train A and Train B AC electrical power distribution subsystem(s) and the Train A and Train B 250 VDC electrical power distribution subsystem(s) required to support the equipment required to be OPERABLE by LCO 3.7.8, "Essential Service Water (ESW) System," to be OPERABLE. This change is discussed in DOC A.2. An explicit Surveillance Requirement has been added (SR 3.8.9.1) which requires the verification of correct breaker alignments and voltage to required opposite unit electrical power distribution subsystems. This changes the CTS by adding an explicit Surveillance Requirement for the opposite unit electrical power distribution subsystems to be applicable to the given unit Technical Specifications.	SR 3.8.9.1	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.10 M.1	CTS LCO 3.8.2.2 requires a minimum of one 4160 V emergency bus, one 600 V emergency bus, and two 120 VAC vital buses to be OPERABLE. CTS LCO 3.8.2.4 requires one 250 VDC bus to be OPERABLE. The existing requirement of CTS LCO 3.8.2.2 and LCO 3.8.2.4 for distribution buses to be OPERABLE during shutdown conditions is not specific as to what the system must be powering. ITS 3.8.10 specifies that the necessary portions of Train A and Train B AC, Train A and Train B 250 VDC, and Train A and Train B 120 VAC vital bus electrical power distribution subsystems must be OPERABLE to support equipment required to be OPERABLE. In addition, an optional Required Action (ITS 3.8.10 Required Action A.1) has been added which allows the associated supported required feature(s) to be declared inoperable. This change adds a requirement that the applicable portions of Train A and Train B AC, Train A and Train B 250 VDC, and Train A and Train B 120 VAC vital bus electrical power distribution subsystems must be OPERABLE when required to support equipment required to be OPERABLE by the Technical Specifications. This could require more buses to be OPERABLE than is currently required. In addition, an action has been added to allow an option to the existing actions.	LCO 3.8.10, 3.8.10 Required Action A.1	LCO 3.8.2.2, LCO 3.8.2.4
3.8.10 M.2	CTS 4.8.2.2 and CTS 4.8.2.4.1 state the specified buses shall be determined OPERABLE by verifying correct breaker alignment and "indicated power availability." ITS SR 3.8.10.1 requires the verification of correct breaker alignments and "voltage" to required AC, DC, and 120 VAC vital buses electrical power distribution subsystems. This changes the CTS by requiring the verification of the correct voltages to the required AC, DC, and 120 VAC vital bus electrical power distribution subsystems, whereas the CTS only requires verification of indicated power availability.	SR 3.8.10.1	4.8.2.2, 4.8.2.4
3.8.10 M.3	Unit 2 CTS 3.8.2.2 requires one AC electrical power distribution subsystem to be OPERABLE. The required AC electrical power distribution subsystem buses are Unit 2 buses. Unit 2 CTS 3.9.12 requires the Fuel Handling Area Exhaust Ventilation (FHAEV) System (which is powered from Unit 1 AC buses) to be OPERABLE whenever irradiated fuel is in the storage pool. The Unit 2 CTS definition of "OPERABLE-OPERABILITY" requires all attendant equipment to be capable of performing its required function. However, there are no specific requirements in CTS 3.8.2.2 requiring the testing of the Unit 1 AC electrical power distribution subsystem buses that support the FHAEV System. Unit 2 ITS LCO 3.8.10 requires a Unit 1 electrical power distribution subsystem to support equipment required to be OPERABLE. This change is discussed in DOC A.3. An explicit SR (ITS SR 3.8.10.1) has been added which requires the verification of correct breaker alignments and voltage to the required Unit 1 electrical power distribution subsystem. This changes the Unit 2 CTS by explicitly requiring a Surveillance Requirement for the Unit 1 AC electrical power distribution subsystem required to be OPERABLE to support Unit 2 operation.	Unit 2 SR 3.8.10.1	N/A

Table M - More Restrictive Changes
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.1 M.1	CTS 3.9.1 Action a requires the immediate suspension of positive reactivity changes "except addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2" (i.e., 2400 ppm). ITS 3.9.1 Required Action A.2 requires positive reactivity additions to be suspended, but does not provide any allowance for positive reactivity changes due to the addition of water from the RWST to continue. This changes the CTS by removing the allowance to allow a positive reactivity change from the addition of water from the RWST, provided the boron concentration of the RWST is greater than 2400 ppm.	3.9.1 Required Action A.2	3.9.1 Action a
3.9.2 M.1	CTS 3.9.2 states, in part, that two source range neutron flux monitors shall be "operating." ITS 3.9.2 states, in part, that two source range neutron flux monitors shall be "OPERABLE." This changes the CTS by requiring the source range neutron flux monitors to be OPERABLE, instead of just operating.	LCO 3.9.2	LCO 3.9.2
3.9.2 M.2	CTS 3.9.1 Action a requires the immediate suspension of positive reactivity changes except for the addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2 (i.e., 2400 ppm). ITS 3.9.2 Required Action A.2 requires suspension of 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. This changes the CTS by replacing the allowance to allow a positive reactivity change from the addition of water from the RWST, provided the boron concentration of the RWST is greater than 2400 ppm with a requirement that the boron concentration must meet the boron concentration of LCO 3.9.1.	3.9.2 Required Action A.2	3.9.1 Action a
3.9.2 M.3	CTS 3.9.2 Action a states that with fewer than two source range channels operating, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes except addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2 (i.e., 2400 ppm). The ITS provides similar ACTIONS as the CTS (except where changed as described in DOCs M.2 and L.2). In addition, ITS 3.9.2 ACTION B requires additional actions when two source range neutron flux monitors are inoperable. The ITS requires immediate initiation of action to restore one source range neutron flux monitor to OPERABLE status and to perform a verification of boron concentration (per ITS SR 3.9.1.1) once per 12 hours. This changes the CTS requirements by requiring an additional verification of boron concentration every 12 hours when both source ranges are inoperable and by requiring an additional action to initiate immediate action to restore one source range neutron flux monitor to OPERABLE status.	3.9.2 ACTION B	N/A
3.9.2 M.4	Not used.		
3.9.2 M.5	Not used.		
3.9.4 M.1	CTS 3.9.8.1 requires that at least one residual heat removal loop be in operation. ITS 3.9.4 requires that one RHR loop shall be OPERABLE and in operation. This changes the CTS by requiring the RHR loop to be OPERABLE, instead of just in operation.	LCO 3.9.4	LCO 3.9.8.1
3.9.4 M.2	The CTS 3.9.8.1 Actions do not include an action to immediately initiate action to satisfy the RHR loop requirements in the event the RHR loop requirements are not met. ITS 3.9.4 Required Action A.3 requires that action be immediately initiated to satisfy the RHR loop requirements. This changes the CTS by requiring that action be taken immediately to satisfy the RHR loop requirements.	3.9.4 Required Action A.3	N/A

Table M - More Restrictive Changes
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.9.4 M.3	CTS 3.9.8.1 Action b states that the RHR loop may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. The ITS LCO 3.9.4 Note states that the required RHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1, "Boron Concentration." This results in two changes to the CTS. First, the allowance to remove RHR from operation is no longer restricted to CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. Second, the use of the allowance in the ITS is predicated on prohibiting operations that would cause introduction into the RCS, coolant with a boron concentration less than that required to meet the boron concentration of LCO 3.9.1.	LCO 3.9.4 Note	3.9.8.1 Action b
3.9.4 M.4	CTS 4.9.8.1 requires that a residual heat removal loop shall be determined to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 2000 gpm at least once per 24 hours. ITS SR 3.9.4.1 requires the same verification every 12 hours. This changes the CTS by requiring that RHR loop operation and reactor coolant flow rate be verified every 12 hours instead of every 24 hours.	SR 3.9.4.1	4.9.8.1
3.9.5 M.1	The CTS 3.9.8.1 Actions do not include an action to immediately initiate action to restore one RHR loop to operation in the event the RHR loop requirements are not met. ITS 3.9.5 Required Action B.2 requires that action be immediately initiated to restore one RHR loop to operation. This changes the CTS by requiring that action be taken immediately to restore one RHR loop to operation.	3.9.5 Required Action B.2	N/A
3.9.5 M.2	CTS 4.9.8.1 requires that a residual heat removal loop shall be determined to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 2000 gpm at least once per 24 hours. ITS SR 3.9.5.1 requires the same verification every 12 hours. This changes the CTS by requiring that RHR loop operation and reactor coolant flow rate be verified every 12 hours instead of every 24 hours.	SR 3.9.5.1	4.9.8.1
3.9.5 M.3	CTS 3.9.8.2 requires two independent RHR loops to be OPERABLE and CTS 3.9.8.1 requires at least one RHR loop to be in operation. ITS SR 3.9.5.2 requires verification every seven days of correct breaker alignment and that indicated power is available to the required RHR pump not in operation. A Note states that the Surveillance Requirement is not required to be performed until 24 hours after a required RHR pump is not in operation. This changes the CTS by adding a Surveillance Requirement.	SR 3.9.5.2	N/A
3.9.6 M.1	CTS 3.9.10 is applicable during movement of fuel assemblies or control rods within the "reactor pressure vessel" while in MODE 6. The CTS 3.9.10 Action states that with the reactor vessel water level not within limit, suspend movement of fuel assemblies or control rods within the "pressure vessel." The ITS 3.9.6 Applicability is during movement of irradiated fuel assemblies within "containment." ITS 3.9.6 ACTION A states that with the refueling cavity water level not within limit, suspend movement of irradiated fuel assemblies within "containment." This changes the CTS by expanding the suspension of movement of fuel assemblies from within the "reactor pressure vessel" to within the "containment." The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L.1. The change eliminating MODE 6 is discussed in DOC A.2. The change eliminating control rods is discussed in DOC L.2.	3.9.6 Applicability, 3.9.6 ACTION A	3.9.10 Applicability, 3.9.10 Action

Table M - More Restrictive Changes
ITS Chapter 4.0 - Design Features

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
NONE	NONE	NONE	NONE

Table M - More Restrictive Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.1 M.1	ITS 5.1.1 requires that the plant manager or his designee approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety. The CTS does not include this requirement. This changes the CTS by adding an approved requirement for the plant manager or his designee.	5.1.1	N/A
5.1 M.2	CTS 6.1.2 allows a designated individual to assume the responsibility for the control room command function when the Shift Manager is absent from the control room complex. ITS 5.1.2 provides the allowance for the designated individual to assume the responsibility for the control room command function, but provides additional requirements for the designated individual. In MODE 1, 2, 3, or 4, ITS 5.1.2 requires the designated individual hold an active Senior Operator license. In MODE 5 or 6, ITS 5.1.2 requires the designated individual hold an active Senior Operator license or Operator license. This changes the CTS by adding qualification requirements for the designated individual that assumes the control room command function.	5.1.2	6.1.2
5.2 M.1	CTS 6.2.1.a, regarding documentation and updating of the relationships between operating organization positions, requires the organizational charts to be documented in the UFSAR. ITS 5.2.1.a states "These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR." This changes the CTS by requiring that the specific CNP organizational titles be specified in the UFSAR.	5.2.1.a	6.2.1.a
5.2 M.2	CTS Table 6.2-1 requires the minimum shift crew to include one STA (shared between Units 1 and 2) when the unit is in MODE 1, 2, 3, or 4. ITS 5.2.2.f requires, in part, that an individual (shared between Units 1 and 2) provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit, when the unit is in MODE 1, 2, 3, or 4. This changes the CTS by detailing the specific responsibilities of the STA.	5.2.2.f	N/A
5.4 M.1	ITS 5.4.1.b requires that written procedures shall be established, implemented, and maintained for the emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. The CTS does not include this requirement. This changes the CTS by adopting a new requirement for emergency operating procedures.	5.4.1.b	N/A
5.4 M.2	ITS 5.4.1.e requires that written procedures shall be established, implemented, and maintained for all programs specified in Specification 5.5. The CTS does not include this requirement for any program except the ODCM and the Component Cyclic or Transient Limits Program. This changes the CTS by adopting a new requirement for procedures to address all programs described in ITS 5.5.	5.4.1.e	N/A
5.5 M.1	License Conditions 2.H (Unit 1) and 2.G (Unit 2) provide the requirements for a System Integrity program. The program is not explicit as to which systems outside containment must be monitored. ITS 5.5.2 includes the requirements for the Leakage Monitoring Program and provides a list of systems that should be monitored because they could contain highly radioactive fluids during a serious transient or accident.	5.5.2	License Condition 2.H (Unit 1), License Condition 2.G (Unit 2)

Table M - More Restrictive Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.5 M.2	The CTS does not include program requirements for a Safety Function Determination Program, or Battery Monitoring and Maintenance Program. The ITS includes programs for these activities. This changes the CTS be adding the following programs: ITS 5.5.13, "Safety Function Determination Program (SFDP)"; and ITS 5.5.15, "Battery Monitoring and Maintenance Program."	5.5.13, 5.5.15	N/A
5.6 M.1	The second paragraph of ITS 5.6.2 includes details required to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.1.6 does not contain this level of detail. This changes the CTS by requiring additional detail to be included in the Annual Radiological Environmental Operating Report.	5.6.2	N/A

REPLACEMENT PAGES FOR
DRAFT SAFETY EVALUATION ATTACHMENT 4,
TABLE L - LESS RESTRICTIVE CHANGES

ATTACHMENT 4

Table L - Less Restrictive Changes

Table L - Less Restrictive Changes
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L.1	The CTS Section 1.0 definition of CHANNEL FUNCTIONAL TEST requires the use of a simulated signal when performing the test. ITS Section 1.1 renames the CTS definition to CHANNEL OPERATIONAL TEST (COT) as discussed in DOC A.7. The ITS Section 1.1 COT definition allows the use of an actual or simulated signal when performing the test. This changes the CTS by allowing the use of unplanned actuations to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.	1.1	1.11	Note 1
1.0 L.2	The CTS Section 1.0 definition of CORE ALTERATION applies to the movement or manipulation of any component in the reactor vessel with the vessel head removed and fuel in the vessel. The ITS Section 1.1 definition of CORE ALTERATION will only apply to the movement of fuel, sources, or reactivity control components in the reactor vessel. This changes the CTS by eliminating from the definition of CORE ALTERATION the movement of any components in the reactor vessel that are not fuel, sources, or reactivity control components. The elimination of “or manipulation” from the definition is discussed in DOC A.8.	1.1	1.12	Note 1
1.0 L.3	The CTS Section 1.0 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME require measurement of the response time from the sensor through the actuated equipment. The ITS definitions of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME are modified to state "In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC." This changes the CTS by eliminating the requirement to include all components in a response time test.	1.1	1.23, 1.22	Note 1
1.0 L.4	The CTS Section 1.0 definition of DOSE EQUIVALENT I-131 requires that the DOSE EQUIVALENT I-131 be calculated using either the thyroid dose conversion factors found in Table III of TID 14844, “Calculation of Distance Factors for Power and Test Reactor Sites,” or those listed in Regulatory Guide (RG) 1.109, Rev. 1 (Table E-7). The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors: TID-14844 (1962); Table E-7 of RG 1.109, Rev. 1 (1977); or ICRP 30, Supplement to Part 1, page 192-212, Table Titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity." This changes the CTS by allowing a third method, ICRP 30, Supplement to Part 1, to be used to calculate DOSE EQUIVALENT I-131.	1.1	1.19	Note 1

Table L - Less Restrictive Changes
ITS Chapter 2.0 – Safety Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
NONE	NONE	NONE	NONE	NONE

Table L - Less Restrictive Changes
ITS Section 3.0 – LCO and SR Applicability

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L.1	Not used.			
3.0 L.2	Not used.			
3.0 L.3	CTS 4.0.2 states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as 'once,' the above interval extension does not apply. If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A.12 and DOC M.1.	SR 3.0.2	4.0.2	Note 1
3.0 L.4	Not used.			

Table L - Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.1 L.1	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state that when the SDM is less than the applicable limit, boration must be initiated immediately. ITS 3.1.1 ACTION A states that when SDM is not within limits, boration must be initiated within 15 minutes. This changes the CTS by relaxing the Completion Time from "immediately" to 15 minutes.	3.1.1 ACTION A	3.1.1.1 Actions, 3.1.1.2 Actions	3
3.1.1 L.2	CTS 3.1.1.1 and CTS 3.1.1.2 Actions state that when the SDM is not within the applicable limits, boration must be initiated and continued at ≥ 34 gpm of a solution containing ≥ 6,550 ppm boron or equivalent until the required SDM is restored. ITS 3.1.1 ACTION A states that with the SDM not within limits, initiate boration to restore SDM to within limits. This changes the CTS by eliminating the specific values of flow rate and boron concentration that must be used to restore compliance with the LCO.	3.1.1 ACTION A	3.1.1.1 Actions, 3.1.1.2 Actions	4
3.1.1 L.3	CTS 4.1.1.1.1.d requires verification that SDM is within its limit, "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e below, with the control banks at the maximum insertion limit of Specification 3.1.3.5 (Unit 1) and Specification 3.1.3.6 (Unit 2)." The ITS does not contain a similar requirement.	N/A	4.1.1.1.1.d	5
3.1.2 L.1	CTS 3.1.1.1 is applicable in MODES 1, 2, 3, and 4. ITS 3.1.2 is applicable in MODES 1 and 2. This changes the CTS by reducing the applicable MODES in which the core reactivity requirement must be met.	3.1.2 Applicability	3.1.1.1 Applicability	2
3.1.2 L.2	CTS 3.1.1.1 does not contain Actions to follow if the core reactivity balance Surveillance is not met. If the core reactivity balance Surveillance was not met, LCO 3.0.3 would be entered. LCO 3.0.3 requires the plant to be in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. ITS 3.1.2 contains ACTIONS to follow if the core reactivity balance LCO is not met. If the LCO is not met, 7 days is provided to re-evaluate the core design and safety analysis, to determine that the reactor core is acceptable for continued operation, and to establish appropriate operating restrictions and SRs. If these actions are not completed within the 7 days, the plant must be in MODE 3 within 6 hours. This changes the CTS by providing 7 days to evaluate and provide compensatory measures for not meeting the core reactivity balance requirement and then requiring entry into MODE 3 instead of requiring an immediate shutdown and entry into MODE 5.	3.1.2 ACTIONS A and B	3.1.1.1, 3.0.3	4
3.1.2 L.3	CTS Surveillance 4.1.1.1.2 requires the overall core reactivity balance to be compared with the predicted value once per 31 EFPD. The CTS also requires the predicted reactivity values to be adjusted (normalized) to correspond to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. ITS SR 3.1.2.1 also allows the measured core reactivity to be compared to the predicted values every 31 EFPD, but the ITS SR is only required after 60 EFPD of core burnup. The ITS also requires the adjustment of the predicted values to the actual values prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. This changes the CTS by not requiring the periodic, at-power core reactivity comparison until core burnup reaches 60 EFPD.	SR 3.1.2.1	4.1.1.1.2	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.3 L.1	CTS 3.1.1.4 Action a.2 states that if the measured MTC is more positive than the BOL (i.e., upper) limit, then the control rod withdrawal limits established in Action a.1 must be maintained until subsequent measurement verifies that the MTC has been restored to within its limits for the all rods withdrawn condition. ITS 3.1.3 does not contain a requirement that the control rod withdrawal limits be maintained until MTC is confirmed to be within its limit by measurement. However, ITS LCO 3.0.2 states that the Required Actions shall be followed until the LCO is met or no longer applicable. The ITS Bases state that physics calculations may be used to determine the time in cycle life at which the calculated MTC will meet the LCO requirement, and at this point in core life the condition may be exited and the control rod withdrawal limits removed. This changes the CTS by eliminating the Surveillance Requirement verifying the MTC to be within its limit before removing the control rod withdrawal limits.	N/A	3.1.1.4 Action a.2	5
3.1.3 L.2	CTS 3.1.1.4 Action a.3 requires that a Special Report be prepared and submitted to the NRC within 10 days if the measured MTC is more positive than the BOL limit. The Special Report must describe the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition. ITS 3.1.3 does not include this requirement.	N/A	3.1.1.4 Action a.3	8
3.1.3 L.3	CTS 4.1.1.4.b) requires MTC to be determined to be within limits. MTC shall be measured at any THERMAL POWER within 7 EFPD after reaching an equilibrium boron concentration of 300 ppm. The measured value shall be compared to the 300 ppm Surveillance limit specified in the COLR. In the event this comparison indicates that the MTC will be more negative than the EOL (i.e., lower) limit, the MTC shall be remeasured at least once per 14 EFPD during the remainder of the fuel cycle and the MTC value compared to the EOL limit. ITS SR 3.1.3.2 requires the verification that MTC is within the lower limit. The first proposed Frequency is once each cycle within 7 effective full power days (EFPD) after reaching an equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm. The second Frequency is 14 EFPD thereafter if MTC is more negative than the 300 ppm Surveillance limit (not LCO limit) specified in the COLR until the MTC measured at the equivalent of equilibrium RTP-ARO boron concentration of ≤ 60 ppm is less negative than the 60 ppm Surveillance limit specified in the COLR. This changes the CTS by eliminating the requirement to verify that MTC is met at least once per 14 EFPD if the measured MTC at the equivalent of equilibrium RTP-ARO boron concentration of ≤ 60 ppm is less negative than the 60 ppm Surveillance limit specified in the COLR.	SR 3.1.3.2	4.1.1.4.b)	7
3.1.4 L.1	CTS 3.1.3.1 Actions a and c.2 require satisfying the SHUTDOWN MARGIN requirement in accordance with Specification 3.1.1.1. In the same conditions, ITS 3.1.4 requires verification that the SHUTDOWN MARGIN is within limits or initiating boration to restore SDM to within limits. This changes the CTS by providing the option to initiate action to establish compliance with the SDM requirement within 1 hour instead of declaring the Required Action not met and following ITS LCO 3.0.3.	3.1.4 Required Actions A.1.1, A.1.2, B.1.1, and B.1.2	3.1.3.1 Actions a and c.2	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L.2	CTS 3.1.3.1 Action a specifies requirements for one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable. CTS 3.1.3.1 Action b specifies requirements for more than one full length rod inoperable or misaligned from the group step counter demand position by more than the allowed rod misalignment. CTS 3.1.3.1 Action c specifies requirements for one full length rod inoperable due to causes other than those addressed by Action a, above, or misaligned from its group step counter demand position by more than the allowed rod misalignment. CTS 3.1.3.1 Action c.2 requires the affected rod to also be declared inoperable. ITS 3.1.4 ACTION A specifies requirements for one or more rod(s) inoperable. ITS 3.1.4 ACTION B specifies requirements for one rod not within alignment limits. ITS 3.1.4 ACTION D specifies requirements for more than one rod not within alignment limits. This changes the CTS by considering shutdown and control rods that are trippable but misaligned to be OPERABLE and excludes other types of control rod inoperabilities not addressed in CTS 3/4.1.3.1 (e.g., insertion times). The requirement to declare a misaligned rod inoperable in CTS 3.1.3.1, Action c.2, is deleted. The requirements for control rod drop times are addressed in DOC M.3.	3.1.4 ACTIONS A, B, and D	3.1.3.1 Actions a, b, c, and c.2	4
3.1.4 L.3	CTS 3.1.3.1 Action c.2.a) states that when a rod is misaligned, POWER OPERATION may continue if a reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days. This re-evaluation shall confirm that the previous analyzed results of these accidents remain valid for the duration of operation under these conditions. ITS 3.1.4 Required Action B.6 states that when one rod is misaligned, re-evaluate the safety analyses and confirm results remain valid for the duration of operation under these conditions. This changes the CTS by eliminating Table 3.1-1, which lists the specific events to be re-evaluated and the Action to evaluate those specific events.	3.1.4 Required Action B.6	3.1.3.1 Action c.2.a), Table 3.1-1	4
3.1.4 L.4	CTS 3.1.3.1 Action c.2.d) states that with one rod misaligned, reduce the THERMAL POWER level to ≤ 75% of RATED THERMAL POWER within one hour. ITS 3.1.4 Required Action B.2 requires THERMAL POWER to be reduced to ≤ 75% RTP within 2 hours. This changes the CTS by changing the Completion Time from one hour to two hours.	3.1.4 Required Action B.2	3.1.3.1 Action c.2.d)	3
3.1.4 L.5	CTS 3.1.3.1 Action c.2.d) states that with one rod misaligned, reduce the THERMAL POWER level to ≤ 75% of RATED THERMAL POWER and reduce the high neutron flux trip setpoint to ≤ 85% of RTP within the next 4 hours. ITS 3.1.4 Required Action B.2 requires THERMAL POWER to be reduced to ≤ 75% RTP, but does not require the high neutron flux trip setpoint to be reduced. This changes the CTS by eliminating the Required Action to reduce the high neutron flux trip setpoint.	N/A	3.1.3.1 Action c.2.d)	4
3.1.4 L.6	CTS 4.1.3.1.1 requires the position of each full length rod to be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours. ITS SR 3.1.4.1 requires verification that the individual rod positions are within the alignment limits every 12 hours. This changes the CTS by eliminating the requirement to verify the individual rod positions to be within alignment limits every 4 hours when the Rod Position Deviation Monitor is inoperable.	SR 3.1.4.1	4.1.3.1.1	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.4 L.7	CTS 4.1.3.3 (Unit 1) and CTS 4.1.3.4 (Unit 2) require the rod drop time test to be performed prior to entering MODE 2 following each removal of the reactor vessel head. ITS SR 3.1.4.3 requires this test to be performed prior to criticality after each removal of the reactor head. This changes the CTS by allowing the rod drop test to be delayed from before entering MODE 2 to prior to criticality.	SR 3.1.4.3	4.1.3.3 (Unit 1), 4.1.3.4 (Unit 2)	7
3.1.4 L.8	CTS 4.1.3.3.b (Unit 1) and CTS 4.1.3.4.b (Unit 2) require the rod drop time of full length rods to be demonstrated through measurement prior to entering MODE 2 for specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods. The ITS does not include this testing requirement.	N/A	4.1.3.3.b (Unit 1), 4.1.3.4.b (Unit 2)	5
3.1.4 L.9	CTS 4.1.3.3.c (Unit 1) and CTS 4.1.3.4.c (Unit 2) require the rod drop time of full length rods to be demonstrated through measurement prior to entering MODE 2 following each removal of the reactor vessel head and at least once per 18 months. ITS SR 3.1.4.3 requires the test to be performed prior to criticality after each removal of the reactor head. The requirements in the CTS to perform the test following each removal of the reactor vessel head and at least once per 18 months normally coincide with one another. The head is removed once each cycle (approximately once every 18 months) unless there is a need to remove the head prior to the end of the cycle. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to prior to criticality after each removal of the reactor head. This new Surveillance could occur up to once every 24 months (i.e., a maximum of 30 months or greater accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) depending on when the head is removed.	SR 3.1.4.3	4.1.3.3.c (Unit 1), 4.1.3.4.c (Unit 2)	10
3.1.4 L.10	CTS 4.1.1.1.1.a and CTS 4.1.1.2.a require verification of SHUTDOWN MARGIN within one hour after detection of inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) are inoperable. These requirements are applicable in MODES 1, 2, 3, 4, and 5. ITS 3.1.4 Required Action A.1.1 requires the verification of SDM to be within limits within 1 hour. These verifications are required in MODES 1 and 2 with one or more control rod(s) inoperable. This changes the CTS by not requiring any explicit SDM verifications for inoperable control rod(s) in MODES 3, 4, and 5 other than the normal verifications specified in ITS SR 3.1.1.1 (once every 24 hours). For MODE 1 and 2 operations, this changes the CTS by not requiring the verification of SDM on a once per 12 hour basis for one or more inoperable rod(s).	3.1.4 Required Action A.1.1	4.1.1.1.1.a, 4.1.1.2.a	5
3.1.4 L.11	CTS 3.1.3.3 (Unit 1) and CTS 3.1.3.4 (Unit 2) contains the specific requirements for rod drop time testing. The CTS specifies that the rod drop time be verified at an RCS T_{avg} of ≥ 541°F. ITS SR 3.1.4.3 specifies the rod drop time be verified at a RCS T_{avg} of ≥ 500°F. This changes the CTS by lowering the required temperature at which rod drop time must be verified.	SR 3.1.4.3	3.1.3.3 (Unit 1), 3.1.3.4 (Unit 2)	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.5 L.1	CTS 3.1.3.4 Action (Unit 1) and CTS 3.1.3.5 Action (Unit 2) provide compensatory actions for a maximum of one shutdown rod inserted beyond the insertion limit specified in the COLR. The actions require that within one hour, either restore the rod to within the insertion limit specified in the COLR or declare the rod inoperable and apply Specification 3.1.3.1. For more than one shutdown rod beyond the insertion limit the CTS would result in an CTS 3.0.3 entry. ITS 3.1.5 ACTION A provides Required Actions for one or more shutdown banks not within limits. ITS 3.1.5 Required Action A.1.1 requires the verification that SDM is within limits in one hour and ITS 3.1.5 Required Action A.1.2 requires the initiation of boration to restore SDM to within limits in one hour (only one of these Required Actions must be performed). In addition, ITS 3.1.5 Required Action A.2 requires the restoration of shutdown banks to within limits in 2 hours. With any Required Action and associated Completion Time (of Condition A) not met the unit must be in MODE 3 in the following 6 hours. This changes the CTS by allowing more than one shutdown rod to be outside the insertion limits specified in the COLR, provides an additional hour to restore the shutdown bank or control rods to within limits, eliminates the allowance to declare the rod inoperable and take the ACTIONS of Specification 3.1.3.1, and adds the requirement to verify SDM or to initiate boration within one hour. It also eliminates the requirement to enter LCO 3.0.3 if more than one shutdown rod is inserted beyond the insertion limits.	3.1.5 ACTION A	3.1.3.4 Action (Unit 1), 3.1.3.5 Action (Unit 2)	4
3.1.5 L.2	CTS 4.1.3.4.a (Unit 1) and CTS 4.1.3.5.a (Unit 2) require verification that each shutdown rod is within the insertion limit specified in the COLR within 15 minutes prior to withdrawal of any control rods in control rod banks A, B, C, and D during an approach to reactor criticality. ITS 3.1.5 does not require verification that the shutdown rods are above the insertion limits within 15 minutes prior to control bank withdrawal. This changes the CTS by eliminating the requirement that the shutdown banks be verified to be above the insertion limit within 15 minutes prior to withdrawing control banks A, B, C, and D.	N/A	4.1.3.4.a (Unit 1), 4.1.3.5.a (Unit 2)	5
3.1.6 L.1	CTS 4.1.3.5 (Unit 1) and CTS 4.1.3.6 (Unit 2) require the position of each control bank to be determined to be within the insertion limits at least once per 12 hours except during time intervals when the Rod Insertion Limit Monitor is inoperable, then verify the individual rod positions at least once per 4 hours. ITS SR 3.1.6.2 requires verification that each control bank insertion is within the insertion limits specified in the COLR every 12 hours. This changes the CTS by eliminating the requirement to verify the control bank insertion to be within limits every 4 hours when the Rod Insertion Limit Monitor is inoperable.	SR 3.1.6.2	4.1.3.5 (Unit 1), 4.1.3.6 (Unit 2)	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L.1	CTS 3.1.3.2 Action a covers the inoperabilities for a maximum of one rod position indicator channel per group. CTS 3.1.3.2 Action b covers the inoperabilities for a maximum of one demand position indicator per bank. ITS 3.1.7 ACTIONS are modified by a Note that states "Separate Condition entry is allowed for each rod position indicator and each demand position indicator." ITS ACTION A covers inoperabilities for one rod position indication (RPI) per group for one or more groups and ITS ACTION B covers inoperabilities for more than one RPI per group. ITS ACTION C covers the inoperabilities for one or more demand position indicators. This changes the CTS by allowing separate Condition entry for each inoperable rod position indicator and each inoperable demand position indicator instead of for a maximum of one rod position indicator channel per group and a maximum of one demand position indicator per bank. Other modifications associated with CTS 3.1.3.2 Action b (ITS 3.1.7 ACTION C) are discussed in DOC L.4, while the addition of ITS ACTION B is discussed in DOC L.5.	3.1.7 ACTIONS Note, 3.1.7 ACTIONS A and B	3.1.3.2 Actions a and b	4
3.1.7 L.2	CTS 3.1.3.2 Action a.1 states that with a maximum of one individual rod position indicator channel per group inoperable, determine the position of the non-indicating rod(s) indirectly by the movable incore detectors at least once per 8 hours and "immediately" after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position. ITS 3.1.7 Required Action A.1 states to verify the position of the rod with an inoperable position indicator by using the movable incore detectors once per 8 hours and "once within 4 hours" after a rod with an inoperable position indicator has been moved in excess of 24 steps in one direction since the last determination of the rod's position. This changes the CTS by allowing 4 hours to verify the rod position instead of requiring the verification immediately.	3.1.7 Required Action A.1	3.1.3.2 Action a.1	3
3.1.7 L.3	CTS 3.1.2.1 Action a.2 and Action b.2 require the unit to reduce THERMAL POWER to less than 50% of RATED THERMAL POWER. ITS 3.1.7 Required Actions A.2 and C.2 require the unit to be at a THERMAL POWER of less than or equal to 50% RATED THERMAL POWER under the same conditions. This changes the CTS by allowing a unit to be at 50% RATED THERMAL POWER instead of less than 50% RATED THERMAL POWER.	3.1.7 Required Actions A.2 and C.2	3.1.2.1 Actions a.2 and b.2	4
3.1.7 L.4	Not used.			
3.1.7 L.5	CTS 3.1.3.2 does not have an action for when more than one rod position indicator channel is inoperable per group. CTS 3.0.3 would be entered in this condition. CTS 3.0.3 requires a shutdown to HOT STANDBY within 7 hours. ITS 3.1.7 ACTION B applies when more than one RPI per group is inoperable and requires the rods to be placed under manual control immediately, monitoring and recording of RCS T_{avg} once per hour, and restoration of all but one RPI to OPERABLE status within 24 hours. This changes the CTS by allowing operation for an additional 24 hours with more than one RPI per group inoperable.	3.1.7 ACTION B	3.1.3.2, 3.0.3	4

Table L - Less Restrictive Changes
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.8 L.1	CTS 3.10.4 (Unit 1) and CTS 3.10.3 (Unit 2) state that limitations of certain Specifications may be suspended during the performance of PHYSICS TESTS. ITS 3.1.8 provides an additional exception to LCO 3.4.2, "RCS Minimum Temperature for Criticality," provided the RCS lowest loop average temperature is ≥ 531°F. A Surveillance to verify the RCS lowest loop average temperature is > 531°F every 30 minutes (proposed SR 3.1.8.1) has been added. In addition, ACTION C has been added to cover the situation when RCS lowest loop average temperature is not within limit. The Required Action is to restore RCS lowest loop average temperature to within limit within 15 minutes. If this is not met, then ACTION D requires the unit to be in MODE 3 within 15 minutes. This changes the CTS by allowing the suspension of LCO 3.4.2, "RCS Minimum Temperature for Criticality." However, it places a limitation on the RCS lowest loop average temperature that is allowed.	LCO 3.1.8, 3.1.8 ACTIONS C and D, SR 3.1.8.1	3.10.4 (Unit 1), 310.3 (Unit 2)	1
3.1.8 L.2	CTS 4.10.4.2 (Unit 1) and CTS 4.10.3.2 (Unit 2) require that CHANNEL FUNCTIONAL TESTS be performed on each Intermediate and Power Range channel prior to initiating PHYSICS TESTS. ITS SR 3.3.1.8 for the Power Range channels and ITS SR 3.3.1.10 for the Intermediate Range channels require the tests to be performed every 92 days and every 184 days, respectively. Since ITS 3.3.1 requires these channels to be OPERABLE in MODE 2 and in MODE 2 above the P-6 Interlock, respectively, this effectively ensures the tests are performed within their required Frequency prior to entering MODE 2 (i.e., prior to performing the PHYSICS TESTS). This changes the CTS by eliminating the time period prior to initiation of PHYSICS TESTS within which the testing must be performed.	N/A	4.10.4.2 (Unit 1), 4.10.3.2 (Unit 2)	7
3/4.1.1.3 L.1	CTS 3.1.1.3 requires the flow rate of reactor coolant through the Reactor Coolant System (RCS) to be greater than or equal to 2000 gpm whenever a reduction in RCS boron concentration is being made. With the flow rate not within limit, immediate suspension of all operations involving a reduction in boron concentration is required. CTS 4.1.1.3 requires the RCS flow rate to be monitored prior to the start of a reduction in the RCS born concentration. The ITS does not include this Specification. This changes the CTS by eliminating this Specification.	N/A	3/4.1.1.3	1
3/4.1.2.3 L.1	CTS 3.1.2.3.b states that one charging flow path associated with support of Unit 2 (Unit 1) and Unit 1 (Unit 2) shutdown functions shall be available. The ITS does not include these requirements. This changes the CTS by deleting these requirements from the CTS.	N/A	3.1.2.3.b, 3.1.2.3 Actions d and e, 4.1.2.3.3	1

Table L - Less Restrictive Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.1 L.1	CTS 3.2.2 Action a states the Power Range Neutron Flux - High trip setpoints must be reduced 1% for each 1% $F_Q(Z)$ exceeds its limit within 4 hours. The CTS 3.2.6 Action states the Power Range Neutron Flux - High trip setpoints must be reduced by the same percentage which APL is below RTP within 4 hours. (It should be noted that the term APL has been changed to $F^W_Q(Z)$ per DOC A.4). ITS 3.2.1 Required Actions A.2 and B.2 requires the Power Range Neutron Flux - High trip setpoints to be reduced ≥ 1% for each 1% $F^C_Q(Z)$ exceeds its limit or for each 1% that $F^W_Q(Z)$ exceeds its limit, respectively, within 72 hours. This changes the CTS by extending the Completion Time from 4 hours to 72 hours.	3.2.1 Required Actions A.2 and B.2	3.2.2 Action a, 3.2.6 Action	3
3.2.1 L.2	CTS 3.2.2 Action b states that when $F_Q(Z)$ exceeds its limit, identify and correct the cause of the out of limit condition prior to increasing THERMAL POWER above the reduced power limit. ITS 3.2.1 Required Action A.4 requires verification that $F^C_Q(Z)$ is within its limit prior to increasing THERMAL POWER above the reduced power limit. This changes the CTS by eliminating the requirement to identify the cause of the out of limit condition prior to increasing power above the reduced power limit.	3.2.1 Required Action A.4	3.2.2 Action b	4
3.2.1 L.3	The CTS 3.2.6 Action states that with APL less than THERMAL POWER, reduce THERMAL POWER to APL or less of RATED THERMAL POWER within 15 minutes. ITS 3.2.1 Required Action B.1 requires, under the similar condition (It should be noted that APL has been changed to $F^W_Q(Z)$ per DOC A.4), 4 hours to complete the Required Action. This changes the CTS by extending the Completion Time from 15 minutes to 4 hours.	3.2.1 Required Action B.1	3.2.6 Action	3
3.2.2 L.1	CTS 3.2.3 Action a states that when $F^N_{\Delta H}$ exceeds its limit, reduce THERMAL POWER to less than 50% RTP within 2 hours and reduce the Power Range Neutron Flux - High Trip Setpoints to less than or equal to 55% of RTP within the next 4 hours. ITS 3.2.2 Required Actions A.1 and A.3 state than with $F^N_{\Delta H}$ not within this limit, reduce THERMAL POWER to < 50% RTP within 4 hours and reduce the Power Range Neutron Flux - High trip setpoints to ≤ 55% RTP within 72 hours. This changes the CTS by allowing a 4 hour Completion Time to reduce power to < 50% RTP and 72 hours to reduce the trip setpoints.	3.2.2 Required Actions A.1 and A.3	3.2.3 Action a	3
3.2.2 L.2	CTS 3.2.3 Action b states that when $F^N_{\Delta H}$ exceeds its limit, demonstrate through incore mapping that $F^N_{\Delta H}$ is within its limit within 24 hours or reduce THERMAL POWER to less than 5% within the next 2 hours. ITS 3.2.2 ACTION B states that with the Required Action and associated Completion Time not met, be in MODE 2 within 6 hours. This changes the CTS by allowing a 6 hour Completion Time to reduce power to < 5% RTP in instead of the current 2 hour time limit.	3.2.2 ACTION B	3.2.3 Action b	3
3.2.3 L.1	CTS 3.2.1 Action a.1 provides two options if the AFD is outside the target band and THERMAL POWER is above 90% or 0.9 of APL (whichever is less) RTP: a) to restore the AFD to within limits in 15 minutes; or b) to reduce THERMAL POWER to less than the upper limit specified in the COLR in 15 minutes. Under the same conditions, ITS 3.2.3 ACTION A maintains the 15 minute time limit for the restoration of AFD to within limits, but ITS 3.2.3 ACTION B provides 30 minutes to reduce the THERMAL POWER to < 90% RTP. This changes the CTS by allowing an additional 15 minutes to reduce power.	3.2.3 ACTION B	3.2.1 Action a.1	3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.3 L.2	CTS 3.2.1 Action a.2.a)2) states that when AFD is not within its limit between 50% RTP and 90% or 0.9 of APL (whichever is less) RTP, reduce THERMAL POWER to less than 50% RTP within 30 minutes and reduce the Power Range Neutron Flux - High Trip Setpoints to ≤ 55% of RTP within the next 4 hours. Under the same conditions, ITS 3.2.3 Required Action C.1 only requires THERMAL POWER to be reduced to less than 50% RTP within 30 minutes when AFD is outside of its limit. This changes the CTS by eliminating the requirement to reduce the Power Range Neutron Flux - High Trip Setpoints to ≤ 55% of RTP within the next 4 hours.	N/A	3.2.1 Action a.2.a)2)	4
3.2.3 L.3	CTS 4.2.1.1 requires the indicated AFD for each OPERABLE excore channel to be determined to be within its limits once per 7 days when the AFD Monitor Alarm is OPERABLE, at least once per hour for the first 24 hours after restoring the AFD Monitor Alarm to OPERABLE status if the AFD has been outside the target band in the previous 24 hours, and once per hour for the first 24 hours and once per 30 minutes thereafter when the AFD Monitor Alarm is inoperable. ITS SR 3.2.3.1 requires AFD to be verified within its limits for each OPERABLE excore channel every 7 days. This changes the CTS by eliminating all AFD Surveillance Frequencies based on the OPERABILITY of the AFD Monitor Alarm.	SR 3.2.3.1	4.2.1.1	7
3.2.3 L.4	CTS 4.2.1.3 and CTS 4.2.1.4 require two AFD Surveillances to be performed at the same Frequency as the Allowable Power Level Surveillances in CTS 4.2.6.2. In addition, CTS 4.2.1.3 and CTS 4.2.1.4 state that the provisions of Specification 4.0.4 are not applicable. The CTS 4.2.6.2 Frequency is the first Frequency that occurs of the following: a) upon achieving equilibrium conditions after exceeding 10% or more of RTP, the THERMAL POWER at which the Allowable Power Level was last determined; or b) at least once per 31 EFPD. ITS SR 3.2.3.2 and SR 3.2.3.3 Frequencies for the same Surveillances are: a) once within 31 EFPD after each refueling; and b) 31 EFPD thereafter. The Frequencies of the CTS are changed to be 31 EFPD after a refueling and every 31 EFPD thereafter, and the Specification 4.0.4 allowance is deleted.	SR 3.2.3.2, SR 3.2.3.3	4.2.1.3, 4.2.1.4	7
3.2.4 L.1	CTS 3.2.4 Action a.1.b) states that when QPTR is > 1.02 but ≤ 1.09, reduce THERMAL POWER at least 3% from RTP for each 1% of indicated QPTR in excess of 1.0, and similarly reduce the Power Range Neutron Flux - High Trip Setpoints within the next 4 hours. ITS 3.2.4 Required Action A.1 includes the requirement to reduce THERMAL POWER similar to the CTS, but does not include a requirement to reduce the Power Range Neutron Flux - High Trip Setpoints. This changes the CTS by eliminating the requirement to reduce the Power Range Neutron Flux - High Trip Setpoints.	N/A	3.2.4 Action a.1.b)	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L.2	CTS 3.2.4 Action a.2 states that with QPTR > 1.02 and ≤ 1.09, verify that QPTR is within its limit within 24 hours or reduce THERMAL POWER to < 50% RTP within the next 2 hours and reduce the Power Range Neutron Flux - High Trip Setpoints to ≤ 55% RTP within the next 4 hours. CTS 3.2.4 Action b.2 states that when QPTR is > 1.09 due to misalignment of a RCCA, verify that QPTR is within its limit within 2 hours or reduce THERMAL POWER to < 50% RTP within the next 2 hours and reduce the Power Range Neutron Flux - High Trip Setpoints to ≤ 55% RTP within the next 4 hours. CTS 3.2.4 Action c.1 states that when QPTR is > 1.09 for reasons other than misalignment of a RCCA, reduce THERMAL POWER to < 50% RTP within the next 2 hours and reduce the Power Range Neutron Flux - High Trip Setpoints to ≤ 55% RTP within the next 4 hours. CTS 3.2.4 Actions a.3, b.3, and c.2 state that the cause of the out of limit QPTR must be identified and corrected prior to increasing THERMAL POWER, and that subsequent operation above 50% RTP may proceed provided that the QPTR is verified to be within its limit at least once per hour for 12 hours or until verified acceptable at 95% or greater RTP. ITS 3.2.4, Required Action A.2 requires the QPTR to be determined within 12 hours, Required Action A.3 requires $F_Q(Z)$ and $F^N_{\Delta H}$ to be verified to be within limit within 24 hours of achieving equilibrium conditions after the power reduction and every 7 days thereafter, Required Action A.4 requires the safety analyses to be reevaluated to confirm the results are still valid for the duration of operation under this condition prior to increasing power, Required Action A.5 requires (after completion of Required Action A.4) the excore detectors to be normalized to restore QPTR within limit prior to increasing power, and Required Action A.6 requires $F_Q(Z)$ and $F^N_{\Delta H}$ to be verified to be within limits within 24 hours after achieving equilibrium condition at RTP not to exceed 48 hours after increasing power. In addition, for the condition of QPTR > 1.09 for reasons other than misalignment of a RCCA, ITS 3.2.4 Required Action A.1 requires THERMAL POWER to be reduced ≥ 3% from RTP for each 1% of QPTR > 1.00, similar to the CTS Actions a.1.b) and b.1. Furthermore, ITS 3.2.4 ACTION B states that with a Required Action and associated Completion Time (of Condition A) not met, reduce THERMAL POWER to ≤ 50% RTP within 4 hours. This changes the CTS by eliminating requirements to be ≤ 50% RTP within a specified time of exceeding the LCO and substituting compensatory measures in ITS ACTION A, which if not met, result in a reduction in power per ITS ACTION B.	3.2.4 ACTIONS A and B	3.2.4 Actions a.2, a.3, b.2, b.3, c.1, and c.2	4
3.2.4 L.3	CTS 3.2.4 Action b.1, which applies when QPTR is > 1.09 due to misalignment of a RCCA, requires a THERMAL POWER reduction of 3% from RTP for every 1% QPTR exceeds 1.0 within 30 minutes. ITS 3.2.4 Required Action A.1 requires a THERMAL POWER reduction of 3% from RTP for every 1% QPTR exceeds 1.0 within 2 hours. This changes the CTS by allowing 2 hours to perform the required power reduction.	3.2.4 Required Action A.1	3.2.4 Action b.1	3
3.2.4 L.4	CTS 4.2.4.a states that QPTR shall be determined to be within the limit by calculating the ratio at least once per 7 days. ITS SR 3.2.4.1 Note 2 states that SR 3.2.4.2, which requires verification of QPTR using the movable incore detectors, may be performed in lieu of SR 3.2.4.1. This changes the CTS by allowing the movable incore detectors to be used to determine QPTR instead of the excore detectors.	SR 3.2.4.1 Note 2	4.2.4.a	6

Table L - Less Restrictive Changes
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2.4 L.5	CTS 4.2.4.a requires the QPTR to be verified to be within limit every 7 days when the QPTR alarm is OPERABLE and CTS 4.2.4.b requires the verification every 12 hours when the QPTR alarm is inoperable. ITS SR 3.2.4.1 requires verification that QPTR is within limit every 7 days. This changes the CTS by eliminating the requirement to verify QPTR more frequently when the QPTR alarm is inoperable.	SR 3.2.4.1	4.2.4.a	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.1	CTS 4.3.1.1.2 requires the total interlock function to be demonstrated OPERABLE at least once per 18 months. ITS SR 3.3.1.16 requires the performance of a CHANNEL OPERATIONAL TEST (COT), which tests a portion of the total interlock function, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.1.16	4.3.1.1.2	10
3.3.1 L.2	CTS 4.3.1.1.2 requires the total interlock function to be demonstrated OPERABLE at least once per 18 months. CTS Table 4.3-1 requires a CHANNEL CALIBRATION of Functional Units 3 through 15 and 17 every 18 months. ITS Table 3.3.1-1 Functional Units 3 through 10, 13 through 15, and 18 require the performance of a CHANNEL CALIBRATION every 24 months (ITS SRs 3.3.1.13, 3.3.1.14, and 3.3.1.15). This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.1.13, SR 3.3.1.14, SR 3.3.1.15	4.3.1.1.2, Table 4.3-1 CHANNEL CALIBRATION requirements for Functional Units 3 through 15 and 17	11
3.3.1 L.3	CTS 4.3.1.1.3 requires the RTS RESPONSE TIME of each reactor trip function to be demonstrated to be within limit at least once per 18 months. ITS SR 3.3.1.19 requires the same test at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.1.19	4.3.1.1.3	10
3.3.1 L.4	CTS Table 3.3-1 requires that when a Functional Unit 2 (Power Range Neutron Flux) channel is inoperable, CTS Table 3.3-1 Action 2 be entered. Action 2 requires, in part, the Power Range Neutron Flux trip setpoint to be reduced to ≤ 85% RTP within the 4 hours. ITS 3.3.1 does not include this Required Action. This changes the CTS by deleting the requirement to reduce the Power Range Neutron Flux - High trip setpoint to ≤ 85% RTP.	N/A	Table 3.3-1 Action 2 for Functional Unit 2	4
3.3.1 L.5	CTS Table 3.3-1 requires Functional Units 2 (Power Range Neutron Flux) and 5 (Intermediate Range Neutron Flux) channels to be OPERABLE with the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal, as stated in CTS Table 3.3-1 Note *. A similar Note is provided in CTS Table 4.3-1 for Functional Units 2 and 5. ITS Table 3.3.1-1 does not include this Applicability for either of these Functions (Functions 2.a, 2.b, and 4). This changes the CTS by deleting the requirements for OPERABILITY of the Power Range Neutron Flux and Intermediate Range Neutron Flux channels with the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal.	N/A	Table 3.3-1 Functional Units 2 and 5 (including Note *)	2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.6	CTS Table 3.3-1 requires that when a Functional Unit 19 (Safety Injection input from ESF) or a Functional Unit 22 (Automatic Trip Logic) train is inoperable, CTS Table 3.3-1 Action 1 be entered. CTS Table 3.3-1 Action 1 requires, in part, the unit to be in MODE 3 within 6 hours. In addition, this Action allows one channel to be bypassed for up to 2 hours for surveillance testing per CTS 4.3.1.1.1. CTS Table 3.3-1 requires that when a Functional Unit 2 (Power Range, Neutron Flux), Functional Unit 3 (Power Range, Neutron Flux, High Positive Rate), or Functional Unit 4 (Power Range, Neutron Flux, High Negative Rate) channel is inoperable, CTS Table 3.3-1 Action 2 be entered. CTS Table 3.3-1 Action 2 allows the inoperable channel be bypassed for up to 2 hours for surveillance testing of the other channels per CTS 4.3.1.1.1. CTS Table 3.3-1 requires that when a Functional Unit 7 (Overtemperature ΔT), Functional Unit 8 (Overpower ΔT), Functional Unit 9 (Pressurizer Pressure - Low), Functional Unit 10 (Pressurizer Pressure - High), Functional Unit 16 (Undervoltage - Reactor Coolant Pumps), or Functional Unit 17 (Underfrequency - Reactor Coolant Pumps) channel is inoperable, CTS Table 3.3-1 Action 6 be entered. CTS Table 3.3-1 Action 6 requires that the inoperable channel be placed in the tripped condition within 1 hour. In addition, this Action allows the inoperable channel be bypassed for up to 2 hours for surveillance testing of the other channels per CTS 4.3.1.1.1. CTS Table 3.3-1 requires that when a Functional Unit 11 (Pressurizer Water Level - High), Functional Unit 12 (Loss of Flow - Single Loop), Functional Unit 13 (Loss of Flow - Two Loops), Functional Unit 14 (Steam Generator Water Level - Low Low), Functional Unit 15 (Steam/Feedwater Flow Mismatch and Low Steam Generator Water), Functional Unit 18.A (Turbine Trip Low Fluid Oil Pressure), or Functional Unit 18.B (Turbine Trip Turbine Stop Valve Closure) channel is inoperable, CTS Table 3.3-1 Action 7 be entered. CTS Table 3.3-1 Action 7 requires, in part, the inoperable channel be placed in the tripped condition within 1 hour and that STARTUP and/or POWER OPERATION may proceed "until performance of the next required CHANNEL FUNCTIONAL TEST." No allowance is provided in this Action to allow an inoperable channel to be bypassed for surveillance testing. CTS Table 3.3-1 requires that when a Functional Unit 20 (Reactor Coolant Pump Breaker Position) channel is inoperable, CTS Table 3.3-1 Action 11 be entered. CTS Table 3.3-1 Action 11 requires the inoperable channel be placed in the tripped condition within 1 hour. ITS Table 3.3.1-1 Functions 17 and 21 require entry into ITS 3.3.1 ACTION J if one Safety Injection Input from ESFAS train or one Automatic Trip Logic train is inoperable. ITS 3.3.1 ACTION J requires the restoration of the inoperable train to OPERABLE status within 6 hours. If the inoperable train cannot be restored to OPERABLE status within 6 hours, the unit must be in MODE 3 within the following 6 hours (ITS 3.3.1 ACTION P). In addition, ITS 3.3.1 ACTION J includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE. ITS 3.3.1 ACTION C applies when one Power Range Neutron Flux - High channel (ITS 3.3.1 Function 2.a) is inoperable. ITS 3.3.1 ACTION C requires the placement of the inoperable channel in the trip condition within 6 hours and includes an allowance to bypass the inoperable channel for up to 4 hours for surveillance testing and setpoint adjustment of other channels. ITS 3.3.1 ACTION D applies when one channel is	3.3.1 Required Action C.1 Note, 3.3.1 Required Actions D.1 (including Note) and J.1 (including Note)	Table 3.3-1 Actions 1 2, 6, 7, and 11	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 continued L.6	inoperable and applies to ITS 3.3.1 Functions 2.b, 3.a, 3.b, 6, 7, 8.a, 8.b, 9 through 15, 16.a, and 16.b. ITS 3.3.1 ACTION D requires the placement of the inoperable channel in the trip condition within 6 hours and includes an allowance to bypass the inoperable channel (except for the Function 11 channel) for up to 4 hours for surveillance testing of other channels. This changes the CTS by: a) allowing 6 hours to restore the CTS Table 3.3-1 Functional Units 19 and 22 trains to OPERABLE status prior to requiring a shutdown to MODE 3 and extends the bypass time for these Functional Units from 2 hours to 4 hours; b) extending the time allowed to place an inoperable channel in the tripped condition from 1 hour to 6 hours for CTS Table 3.3-1 Functional Units 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18.A, 18.B, and 20; c) extending the time allowed to bypass an inoperable channel or train from 2 hours to 4 hours for CTS Table 3.3-1 Functional Units 2, 3, 4, 7, 8, 9, 10, 16, and 17; and d) adds an allowance to bypass the inoperable CTS Table 3.3-1 Functional Units 11, 12, 13, 14, 15, 18.A, and 18.B channels for 4 hours and deletes the requirement that STARTUP and/or POWER OPERATION may proceed "until performance of the next required CHANNEL FUNCTIONAL TEST."			
3.3.1 L.7	Not used.			
3.3.1 L.8	CTS LCO 3.3.1.1 states that the interlocks of Table 3.3-1 shall be OPERABLE. However, no specific Actions are provided for when an interlock is inoperable. Therefore, all affected RTS instrumentation is required to be declared inoperable, which will result in a CTS 3.0.3 entry. CTS 3.0.3 allows 1 hour to initiate action and then requires the unit to be in MODES 3, 4, and 5 within the following 6 hours, 12 hours, and 36 hours, respectively. ITS 3.3.1 ACTION L provides the actions for when one or more interlock channels are inoperable. ACTION L requires a verification that the interlock is in the required state for existing unit conditions within 1 hour. ITS 3.3.1 ACTIONS O, P, and Q, which are applicable if any Required Action and associated Completion Time of Condition L is not met, requires the unit to be placed in MODE or other specified condition outside the Applicability of the associated interlock. This changes the CTS by allowing continued operation as long as the interlock is placed in the correct state and providing actions if the inoperable interlock is not placed in the correct state.	3.3.1 ACTIONS L, O, P, and Q	3.0.3 for Table 3.3-1 P-6, P-7, P-8, and P-10 Interlocks	4
3.3.1 L.9	With one Intermediate Range Neutron Flux channel inoperable, CTS Table 3.3-1 Action 3.b requires, when above the P-6 interlock and below 5% of RTP, the restoration of the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above 5% RTP. ITS 3.3.1 ACTION E, which provides the actions when one Intermediate Range Neutron Flux channel is inoperable, provides two optional Required Actions. Required Action E.1 requires the reduction of THERMAL POWER to < P-6 within 24 hours, while Required Action E.2 requires the increase of THERMAL POWER to > P-10 within 24 hours. This changes the CTS by allowing the unit to change power level to exit the MODE of Applicability instead of requiring the restoration of the equipment.	3.3.1 Required Action E.1 and E.2	Table 3.3-1 Action 3.b	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.10	CTS Table 4.3-1, including Note 1, require the performance of CHANNEL FUNCTIONAL TEST for Functional Units 18.A (Turbine Trip - Low Fluid Oil Pressure) and 18.B (Turbine Trip - Turbine Stop Valve Closure) channels prior to each reactor startup if not performed in previous 7 days. ITS Table 3.3.1-1, Functions 16.a and 16.b require the performance of a TADOT (ITS SR 3.3.1.18) prior to exceeding the P-7 interlock whenever the unit has been in MODE 3, if not performed within the previous 31 days. This changes the CTS by extending the requirement to perform the test from "if not performed within the previous 7 days" to "if not performed within the previous 31 days."	SR 3.3.1.18	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements for Functional Units 18.A and 18.B (including Note 1)	7
3.3.1 L.11	CTS Table 4.3-1 Functional Unit 20 requires the performance of a CHANNEL FUNCTIONAL TEST on the Reactor Coolant Pump Breaker Position Trip channels every 18 months. CTS Table 4.3-1 Functional Unit 19 requires the performance of a CHANNEL FUNCTIONAL TEST on the Safety Injection Input from ESF (Manual ESF functional input check) every 18 months. ITS Table 3.3.1-1 Function 11 requires the performance of ITS SR 3.3.1.17, a TADOT, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.20.	SR 3.3.1.17	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements for Functional Units 19 and 20	10
3.3.1 L.12	CTS Table 3.3-1 Functional Unit 1 specifies the requirements for the Manual Reactor Trip channels. The CTS requirement specifies that Action 12 applies with the number of channels OPERABLE one less than required by the minimum channels OPERABLE requirement. CTS Table 3.3-1 Action 12 requires the restoration of the inoperable channel to OPERABLE status within 48 hours or to be in MODE 3 within the next 6 hours and/or open the reactor trip breakers. ITS Table 3.3.1-1 Function 1 requires entry in ITS 3.3.1 ACTION B if a required channel is inoperable. ITS 3.3.1 Required Action B.1 requires restoration of the channel to OPERABLE status within 48 hours. If this cannot be met in MODE 1 and 2, ACTION P must be entered and Required Action P.1 requires the unit to be in at least MODE 3 within 6 hours. If the inoperable channel cannot be restored to OPERABLE status in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted, ACTION Q must be entered and Required Action Q.1 requires the immediate initiation of action to fully insert all rods and Required Action Q.2 requires the Rod Control System to be in a condition incapable of rod withdrawal within 1 hour. This changes the CTS by not specifically requiring the reactor trip breakers to be opened and providing 1 additional hour to ensure the Rod Control System is incapable of rod withdrawal.	3.3.1 ACTION Q	Table 3.3-1 Action 12	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.13	CTS Table 3.3-1 Functional Units 21 (Reactor Trip Breakers) and 22 (Automatic Trip Logic) specifies that Action 14 applies with the number of channels OPERABLE one less than required by the minimum channels OPERABLE requirement when in MODES 3, 4, and 5 with the reactor trip breakers closed and the rod control system capable of rod withdrawal. CTS Table 3.3-1 Action 14 requires the restoration of the inoperable channel to OPERABLE status within 48 hours "or open the reactor trip breakers within the next hour." In the ITS for the same Functions, if an inoperable channel/train is not restored to OPERABLE status within 48 hours as specified in ITS 3.3.1 ACTION B, then ITS 3.3.1 ACTION Q must be entered. ITS 3.3.1 Required Actions Q.1 and Q.2 require the unit to initiate action to fully insert all rods immediately and to place the Rod Control System in a condition incapable of rod withdrawal within 1 hour. This changes the CTS by not requiring the reactor trip breakers to be opened.	3.3.1 ACTION Q	Table 3.3-1 Action 14	4
3.3.1 L.14	CTS Table 4.3-1 Functional Unit 1, including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST of the Manual Reactor Trip Function prior to each reactor startup if not performed in the previous 7 days. CTS Table 4.3-1 Functional Unit 23, including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST of each Reactor Trip Bypass Breaker prior to each reactor startup if not performed in the previous 7 days. ITS SR 3.3.1.17 requires these tests to be performed every 24 months. This changes the CTS by changing the Surveillance Frequency from prior to each reactor startup if not performed in the previous 7 days to 24 months.	SR 3.3.1.17	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements (including Note 1) for Functional Units 1 and 23	7
3.3.1 L.15	CTS Table 4.3-1 Functional Unit 2, including Note 3, requires a monthly comparison of the incore to excore axial imbalance above 15% of RATED THERMAL POWER and that recalibration is necessary if the absolute difference is greater than or equal to 3 percent. ITS Table 3.3.1-1, Function 6 requires the performance of this same test (ITS SR 3.3.1.3); however, the Frequency has been changed to 31 effective full power days (EFPD). This changes the CTS by allowing this Surveillance to be performed every 31 EFPD instead of 31 days.	SR 3.3.1.3	Table 4.3-1 CHANNEL CALIBRATION requirement for Functional Unit 2 (including Note 3)	7
3.3.1 L.16	CTS Table 4.3-1 Functional Unit 2 (Power Range Neutron Flux), including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST during startup if not performed in previous 7 days. CTS Table 4.3-1 Functional Unit 6 (Source Range Neutron Flux), including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST during startup if not performed in previous 7 days. CTS Table 4.3-1 Functional Unit 21 (Reactor Trip Breakers, Shunt Trip and Undervoltage Trip), including Note 1, requires the performance of a CHANNEL FUNCTIONAL TEST during startup if not performed in previous 7 days. The ITS does not require these "during startup if not performed in the previous 7 days" tests. This changes the CTS by deleting the requirement to perform the startup Surveillance on the Power Range Neutron Flux, Source Range Neutron Flux, and Reactor Trip Breakers, including the Shunt and Undervoltage trip channels.	N/A	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements (including Note 1) for Functional Units 2, 6, and 21	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.17	CTS Table 4.3-1 Functional Unit 6 requires the performance of a CHANNEL FUNCTIONAL TEST every 31 days. This Surveillance is modified by a Note (CTS Table 4.3-1 Note 14), which states that the provisions of Specification 4.0.4 are not applicable when leaving MODE 1 and shall be performed within 24 hours after leaving MODE 1. ITS Table 3.3.1-1 Function 5 requires the performance of a COT (ITS SR 3.3.1.11) at a Frequency of 184 days. This Surveillance is modified by a Note (Note 2) that states that the Surveillance is not required to be performed until 4 hours after power is below the P-6 interlock. This changes the CTS by changing the point at which the required completion time begins (leaving MODE 1 in the CTS and power below P-6 in the ITS) to perform the Surveillance, and reduces the time (24 hours to 4 hours) to perform the Surveillance after reaching that point. The change from a CHANNEL FUNCTIONAL TEST to a COT is discussed in DOC A.20 and the change in the Frequency is discussed in DOC L.18.	SR 3.3.1.11 Note 2	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirement for Functional Unit 6 (including Note 14)	7
3.3.1 L.18	CTS Table 4.3-1 requires a CHANNEL FUNCTIONAL TEST of Functional Units 6 (Source Range Neutron Flux), 16 (Undervoltage - Reactor Coolant Pumps), and 17 (Underfrequency - Reactor Coolant Pumps) instrumentation every 31 days. ITS SR 3.3.1.11 requires the performance of a COT for the Source Range Neutron Flux instrumentation every 184 days and ITS SR 3.3.1.10 requires the performance of a TADOT for the Undervoltage RCPs and Underfrequency RCPs instrumentation every 92 days. This changes the CTS, for Source Range Neutron Flux Function, by extending the Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). Additionally, this changes the CTS, for the Undervoltage - Reactor Coolant Pumps and Underfrequency - Reactor Coolant Pumps Functions, by extending the Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a COT or TADOT is discussed in DOC A.20.	SR 3.3.1.10, SR 3.3.1.11	Table 4.3-1 CHANNEL FUNCTIONAL TEST requirements for Functional Units 6, 16, and 17	9
3.3.1 L.19	CTS Table 2.2-1 provides the Allowable Values for Functional Unit 7 (Overtemperature ΔT), Functional Unit 8 (Overpower ΔT) (Unit 1 only), Functional Unit 9 (Pressurizer Pressure - Low) (Unit 2 only), Functional Unit 10, (Pressurizer Pressure - High), Functional Unit 11 (Pressurizer Water Level - High), Functional Unit 13, (Steam Generator Water Level - Low Low) (Unit 1 only), Functional Unit 14 (Steam/Feedwater Flow Mismatch and Steam Generator Water Level - Low) (Steam Generator Water Level - Low portion only is covered by this change) (Unit 1 only), and Functional Unit 16 (Underfrequency - Reactor Coolant Pumps). ITS Table 3.3.1-1 provides the Allowable Values for all the RTS Instrumentation Functions, including ITS Table 3.3.1-1 Function 6, 7, 8.a, 8.b, 9, 13, 14, and 15. This change revises the above specified CTS RTS Table 2.2-1 Allowable Values to the ITS Allowable Values.	Table 3.3.1-1 Functions 6, 7 (Unit 1 only), 8.a (Unit 2 only), 8.b, 9, 13, 14 (Unit 1 only), and 15 (Unit 1 only)	Table 2.2-1 Functional Units 7, 8 (Unit 1 only), 9 (Unit 2 only), 10, 11, 13 (Unit 1 only), 14 (Unit 1 only), and 16	14

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1 L.20	CTS Table 4.3-1 requires a CHANNEL FUNCTIONAL TEST of Functional Unit 2 (Power Range, Neutron Flux) every 92 days. ITS SR 3.3.1.8 for the Power Range Neutron Flux - Low Function (ITS Table 3.3.1-1 Function 2.b) requires a CHANNEL OPERATIONAL TEST (COT) to be performed every 92 days. Additionally, a Note allows the SR to not be performed until 12 hours after power is reduced below the P–10 interlock. This changes the CTS by allowing 12 hours to perform the required SR (i.e., a COT) after entry into the applicable MODES or other specified conditions (i.e., after reducing power to below P-10) for the Power Range Neutron Flux - Low Function. The change from a CHANNEL FUNCTIONAL TEST to a COT is discussed in DOC A.20.	SR 3.3.1.8	Table 4.3-1 Functional Unit 2	7
3.3.2 L.1	Not used.			
3.3.2 L.2	CTS 4.3.2.1.2 requires the total interlock function to be demonstrated OPERABLE at least once per 18 months. CTS Table 4.3-2 requires a CHANNEL CALIBRATION of Functional Units 1.c through 1.f, 2.c, 3.b.3), 4.c through 4.e, 5.a, 6.a, 7.a, and 10.c every 18 months. ITS Table 3.3.2-1 Functions 1.c, 1.d, 1.e.(1), 1.e.(2), 2.c, 3.b.(3), 4.c through 4.e, 5.b, 6.c, 7.c, 8.b, and 8.c require the performance of a CHANNEL CALIBRATION every 24 months (ITS SR 3.3.2.10). This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.2.10	4.3.2.1.2, Table 4.3-2 CHANNEL CALIBRATION requirements for Functional Units 1.c through 1.f, 2.c, 3.b.3), 4.c through 4.e, 5.a, 6.a, 7.a, and 10.c	11
3.3.2 L.3	CTS 4.3.2.1.3 requires the ESF RESPONSE TIME of each ESFAS function to be demonstrated to be within limit. ITS SR 3.3.2.12 requires the same test, however a Note is included that allows a delay in the performance of the test for the turbine driven AFW pump until 24 hours after the required steam pressure of ≥ 850 psig is reached. This changes the CTS by providing an allowance for delaying the performance of required testing without requiring the turbine driven AFW pump to be declared inoperable.	SR 3.3.2.12 Note	4.3.2.1.3	6
3.3.2 L.4	CTS 4.3.2.1.3 requires the ESF RESPONSE TIME of each ESFAS function to be demonstrated to be within limit at least once per 18 months. ITS SR 3.3.2.12 requires the same test at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.2.12	4.3.2.1.2	10

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L.5	CTS Table 3.3-3 Action 13, which applies when a Functional Unit 1.b (Safety Injection Automatic Actuation Logic), 2.b (Containment Spray Automatic Actuation Logic), 3.b.2) (Containment Isolation Phase "B" Isolation Automatic Actuation Logic), 4.b (Steam Line Isolation Automatic Actuation Logic), or 10.b (Containment Air Recirculation Fan Automatic Actuation Logic) channel is inoperable, allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 14, which applies when a Functional Unit 1.c (Safety Injection Containment Pressure - High), 1.d (Safety Injection Pressurizer Pressure - Low), 1.e (Safety Injection Differential Pressure Between Steam Lines - High), 1.f (Safety Injection Steam Line Pressure - Low), 4.d (Steam Line Isolation Steam Flow in Two Steam Lines - High Coincident with T_{avg} - Low Low), 4.e (Steam Line Isolation Steam Line Pressure - Low), 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High), 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low), 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low), or 10.c (Containment Air Recirculation Fan Containment Pressure - High) channel is inoperable, requires the inoperable channel to be placed in trip within 1 hour. No allowance is provided in this Action to allow an inoperable channel to be bypassed for surveillance testing. CTS Table 3.3-3 Action 16, which applies when a Functional Unit 2.c (Containment Spray Containment Pressure - High High), 3.b.3) (Containment Isolation Phase "B" Isolation Containment Pressure - High High), or 4.c (Steam Line Isolation Containment Pressure - High High) channel is inoperable, allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1. CTS Table 3.3-3 Action 19, which applies when a Functional Unit 7.b (Turbine Driven Auxiliary Feedwater Pumps Reactor Coolant Pump Bus Undervoltage) channel is inoperable, requires the inoperable channel to be tripped within 1 hour and allows one channel to be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1. ITS 3.3.2 ACTION C, which applies to one train inoperable for ITS Table 3.3.2-1 Functional Units 1.b, 2.b, 3.b.(2), 4.b, and 7.b, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE. ITS 3.3.2 ACTION D, which applies to one channel inoperable for ITS Table 3.3.2-1 Functions 1.c, 1.d, 1.e.(1), 1.e.(2), 4.d, 4.e, 5.b, 6.c, 6.f, and 7.c, requires the inoperable channel be placed in the tripped condition within 6 hours and includes an allowance to bypass one channel for up to 4 hours for surveillance testing of other channels. ITS 3.3.2 ACTION E, which applies to one channel inoperable for ITS Table 3.3.2-1 Functions 2.c, 3.b.(3), and 4.c, includes an allowance to bypass one train for up to 4 hours for surveillance testing provided the other train is OPERABLE. This changes the CTS by: a) extending the time allowed to bypass an inoperable channel (specified as an inoperable train in the ITS) from 2 hours to 4 hours for CTS Table 3.3-3 Functional Units 1.b, 2.b, 3.b.2), 4.b, and 10.b; b) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Units 1.c, 1.d, 1.e, 1.f, 4.d, 4.e, 5.a, 6.a, 7.a, and 10.c channel in the tripped condition from 1 hour to 6 hours and adding an allowance to bypass an inoperable channels of the above CTS Functional Units for 4 hours; c) extending the time allowed to bypass an inoperable channel from	3.3.2 Required Action C.1 Note, 3.3.2 Required Action D.1 (including Note), 3.3.2 Required Action E.1 Note	Table 3.3-3 Actions 13, 14, 16, and 19	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 continued L.5	2 hours to 4 hours for CTS Table 3.3-3 Functional Units 2.c, 3.b.3), and 4.c; and d) extending the time allowed to place an inoperable CTS Table 3.3-3 Functional Unit 7.b channel in the tripped condition from 1 hour to 6 hours and extending the time allowed to bypass an inoperable CTS Table 3.3-3 Functional Unit 7.b channel from 2 hours to 4 hours.			
3.3.2 L.6	CTS Tables 3.3-3 and 4.3-2 require Functional Units 4.b (Steam Line Isolation Automatic Actuation Logic), 4.c (Steam Line Isolation Containment Pressure - High High), 4.d (Steam Line Isolation Steam Line Flow in Two Steam Lines - High), 4.e (Steam Line Isolation Steam Line Pressure - Low), and 9.d (Steam Line Isolation Manual Initiation) to be OPERABLE in MODES 1, 2, and 3. ITS Table 3.3.2-1, including Footnote (d), requires these same Functions (ITS Table 3.3.2-1 Functions 4.a, 4.b, 4.c, 4.d, and 4.e) to be OPERABLE in MODE 1, and in MODES 2 and 3 except when all steam generator stop valves (SGSVs) are closed. This changes the CTS by making the Specification for these Functions not applicable in MODES 2 and 3 when all SGSVs are closed.	Table 3.3.2-1 (including Footnote (d)) for Functions 4.a, 4.b, 4.c, 4.d, and 4.e	Tables 3.3-3 and 4.3-2 for Functional Units 4.b, 4.c, 4.d, 4.e, and 9.d	2
3.3.2 L.7	CTS Tables 3.3-3 and 4.3-2 require Functional Unit 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High) to be OPERABLE in MODES 1, 2, and 3. ITS Table 3.3.2-1 requires the same Function (ITS Table 3.3.2-1 Function 5.b) to be OPERABLE in MODE 1, and in MODES 2 and 3 except when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve. This changes the CTS by not requiring the instrumentation to be OPERABLE when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve.	Table 3.3.2-1 Function 5.b	Table 3.3-3 and 4.3-2 Functional Unit 5.a	2
3.3.2 L.8	CTS Table 3.3-3 Functional Unit 5, Turbine Trip and Feedwater Isolation, does not include the Automatic Actuation Logic and Actuation Relay Function. ITS Table 3.3.2-1 Function 5.a requires two Automatic Actuation Logic and Actuation Relay trains to be OPERABLE in MODE 1, and MODES 2 and 3 except when all MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve. This addition is discussed in DOC A.12. ITS 3.3.2 ACTIONS C and I have been included for this Function and provide 6 hours to restore an inoperable train to OPERABLE status if one train is inoperable (ACTION C), and if not restored, provide a shutdown requirement (ACTION H). This changes the CTS by providing specific ACTIONS to take when an Automatic Actuation Logic and Actuation Relays Function associated with Turbine Trip and Feedwater Isolation instrumentation is inoperable.	3.3.2 ACTIONS C and I	N/A	4
3.3.2 L.9	CTS Table 3.3-3 Action 13, which applies when a Functional Unit 1.b (Safety Injection Automatic Actuation Logic), 2.b (Containment Spray Automatic Actuation Logic), 3.b.2) (Containment Isolation Phase "B" Isolation Automatic Actuation Logic), 4.b (Steam Line Isolation Automatic Actuation Logic), or 10.b (Containment Air Recirculation Fan Automatic Actuation Logic) train is inoperable, does not provide any time to restore the inoperable train. ITS 3.3.2 Required Action C.1 will allow 6 hours to restore an inoperable Function 1.b, 2.b, 3.b.(2), 4.b, or 7.b train to OPERABLE status prior to requiring a unit shutdown. This changes the CTS by allowing 6 hours to restore the affected train to OPERABLE status prior to commencing a shutdown.	3.3.2 Required Action C.1	Table 3.3-3 Action 13	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L.10	CTS Table 3.3-3 Action 14 states, in part, that with the number of OPERABLE channels one less than the total number of channels, operations may proceed "until performance of the next required CHANNEL FUNCTIONAL TEST." This CTS Action applies to CTS Table 3.3-3 Functional Units 1.c through 1.f, 4.d, 4.e, 5.a, 6.a, 6.b, 7.a, and 10.c. ITS 3.3.2 ACTION D is the applicable ACTION for the above Functions except Functional Unit 6.b, and ITS 3.3.2 ACTION F is the applicable ACTION for Functional Unit 6.b, when one channel is inoperable, and does not include the restoration time limit of "until performance of the next required CHANNEL FUNCTIONAL TEST." This changes the CTS by allowing operation with an inoperable channel for an unlimited amount of time provided the inoperable channel is in the tripped condition.	N/A	Table 3.3-3 Action 14	4
3.3.2 L.11	CTS Table 3.3-3 Action 16 states that with the number of OPERABLE Functional Unit 2.c, 3.b.3), or 4.c channels one less than the total number of channels, operations may proceed provided the inoperable channel is placed in the bypassed condition. ITS 3.3.2 ACTION E includes the same requirement, however a Completion Time of 6 hours has been added for placing the inoperable channel in bypass. This changes the CTS by allowing 6 hours to place the inoperable channel in the bypass condition.	3.3.2 Required Action E.1	Table 3.3-3 Action 16	4
3.3.2 L.12	CTS LCO 3.3.2.1 states that the interlocks of Table 3.3-3 shall be OPERABLE. However, no specific Actions are provided for when an interlock is inoperable. Therefore, all affected ESFAS instrumentation would be required to be declared inoperable, resulting in a CTS 3.0.3 entry. CTS 3.0.3 allows 1 hour to initiate action and then requires the unit to be in MODES 3, 4, and 5 within the following 6 hours, 12 hours, and 36 hours, respectively. ITS 3.3.2 ACTION G provides the actions for when one or more P-11 interlock channels are inoperable. ITS 3.3.2 ACTION G requires a verification that the interlock is in the required state for existing unit conditions within 1 hour. ITS 3.3.2 ACTION D provides the actions for when one P-12 interlock channel is inoperable. ITS 3.3.2 ACTION D requires the channel be placed in trip within 6 hours. If any of these two actions are not met, ITS 3.3.2 ACTION I requires the unit to be shut down to MODE 4. This changes the CTS by allowing continued operation as long as the P-12 interlock channel is placed in trip or as long as the P-11 interlock channel is placed in the correct state and providing shutdown actions if the inoperable interlock is not placed in the correct state.	3.3.2 ACTIONS D and G	3.0.3 for Table 3.3-3 P-11 and P-12 Interlocks	4
3.3.2 L.13	CTS Table 4.3-2 Functional Unit 6.d (Loss of Main Feed Pumps) requires the performance of a CHANNEL FUNCTIONAL TEST every 18 months. CTS Table 4.3-2 Functional Units 9.a, 9.b, 9.c, 9.d, and 9.e (Manual Initiation) require the performance of a TADOT every 18 months. ITS Table 3.3.2-1 Functions 1.a, 2.a, 3.a.(1), 3.b.(1), 4.a, 6.g, and 7.a require the performance of SR 3.3.2.9, a TADOT, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a TADOT for CTS Table 4.3-2 Function 6.d is discussed in DOC A.10.	SR 3.3.2.9 for Table 3.3.2-1 Functions 1.a, 2.a, 3.a.(1), 3.b.(1), 4.a, 6.g, and 7.a	Table 4.3-2 CHANNEL FUNCTIONAL TEST requirement for Functional Unit 6.d, Table 4.3-2 TRIP ACTUATING DEVICE OPERATIONAL TEST requirement for Functional Units 9.a, 9.b, 9.c, 9.d, and 9.e	10

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L.14	CTS Table 4.3-2 Functional Unit 9.d (Steam Line Isolation Manual Initiation) requires the performance of a CHANNEL FUNCTIONAL TEST every 92 days. ITS Table 3.3.2-1 Function 4.a does not require this test. This changes the CTS by deleting the quarterly CHANNEL FUNCTIONAL TEST of the Steam Line Isolation Manual Initiation Function.	N/A	4.3-2 CHANNEL FUNCTIONAL TEST requirement for Functional Unit 9.d	5
3.3.2 L.15	CTS Table 3.3-3 Functional Unit 5 specifies the requirements for the Turbine Trip and Feedwater Isolation. It does not contain the OPERABILITY requirements for the SI input from ESFAS. CTS Table 3.3-3 Functional Unit 1 requires the Safety Injection Function to also provide input to the Turbine Trip and Feedwater Isolation Function. The Applicability of CTS Table 3.3-3 Functional Unit 1.b, Automatic Actuation Logic is MODES 1, 2, 3, and 4. A new requirement was added as ITS Table 3.3.2-1 Function 5.c, SI Input from ESFAS, as discussed in DOC A.8. ITS Table 3.3.2-1 will require the SI Input from ESFAS Function capable of supporting the Turbine Trip and Feedwater Isolation instrumentation in MODE 1, and MODES 2 and 3 except when all main feedwater isolation valves (MFIVs) or main feedwater regulation valves (MFRVs) are closed and de-activated or isolated by a closed manual valve. This changes the CTS by making the SI Input from ESFAS Function only applicable in MODE 1, and MODES 2 and 3 except when MFIVs or MFRVs are closed and de-activated or isolated by a closed manual valve.	Table 3.3.2-1 Function 5.c	Table 3.3-3 Functional Unit 1.b, Table 3.3-3 Action 13	2
3.3.2 L.16	Not used.			
3.3.2 L.17	CTS Table 3.3-3 Functional Units 6 (Motor Driven Auxiliary Feedwater Pumps) and 7 (Turbine Driven Auxiliary Feedwater Pumps) do not include the Automatic Actuation Logic and Actuation Relays Function. New requirements were added as ITS Table 3.3.2-1 Function 6.a, the Automatic Actuation Logic and Actuation Relays (Solid State Protection System) and Function 6.b, the Automatic Actuation Logic and Actuation Relays (Balance of Plant ESFAS). The Applicability of these Functions is MODES 1, 2, and 3 and two trains of each Function are required to be OPERABLE, as discussed in DOC A.13. ITS 3.3.2 ACTIONS C and I have been included for these Functions and provide 6 hours to restore an inoperable train to OPERABLE status if one train is inoperable (ACTION C), and if not restored, provide a shutdown requirement (ACTION I). In addition, ITS 3.3.2 ACTION C includes an allowance to bypass one train for up to 4 hours for Surveillance testing provided the other train is OPERABLE. ITS 3.3.2 ACTION I requires the unit to be placed in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by providing specific ACTIONS to enter when an Automatic Actuation Logic and Actuation Relays Function associated with AFW instrumentation is inoperable.	3.3.2 ACTIONS C and I	N/A	4
3.3.2 L.18	CTS Table 3.3-3 Functional Unit 7.b, Reactor Coolant Pump Bus Undervoltage, which actuates the Turbine Driven Auxiliary Feedwater Pumps, is required to be OPERABLE during MODES 1, 2, and 3. ITS Table 3.3.2-1 Function 6.f (AFW Undervoltage Reactor Coolant Pump) is required to be OPERABLE only in MODES 1 and 2. This changes the CTS by reducing the applicable MODES in which the Reactor Coolant Pump Bus Undervoltage channels must be OPERABLE.	Table 3.3.2-1 Function 6.f	Table 3.3-3 Functional Unit 7.b	2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.2 L.19	CTS Table 4.3-2 requires a CHANNEL FUNCTIONAL TEST of the Turbine Driven Auxiliary Feedwater Pump Reactor Coolant Pump Bus Undervoltage instrumentation every 31 days. ITS SR 3.3.2.5 requires the performance of a TADOT for the Undervoltage Reactor Coolant Pump instrumentation every 92 days. This changes the CTS by extending the Frequency of the Surveillance from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to a TADOT is discussed in DOC A.10.	SR 3.3.2.5	Table 4.3-2 CHANNEL FUNCTIONAL TEST requirement for Functional Units 6.b and 7.b	9
3.3.2 L.20	CTS Table 3.3-3, Functional Unit 9.a (Safety Injection, Manual Initiation) requires a total of two channels per train to be OPERABLE. ITS Table 3.3.2-1, Function 1.a requires only one channel per train to be OPERABLE. This changes the CTS by decreasing the number of manual channels required OPERABLE from two per train to one per train.	Table 3.3.2-1 Function 1.a	Table 3.3-2 Functional Unit 9.a	N/A
3.3.2 L.21	Not used.			
3.3.2 L.22	CTS Table 3.3-4 provides the Allowable Values for Functional Unit 1.d (Pressurizer Pressure - Low), Functional Unit 1.f (Steam Line Pressure - Low) (Unit 2 only), Functional Unit 4.d (Steam Line Isolation Steam Flow in Two Steam Lines - High Coincident with T_{avg} - Low Low) (T_{avg} - Low Low portion only is covered by this change), Functional Unit 4.e (Steam Line Isolation Steam Line Pressure - Low) (Unit 2 only), Functional Unit 5.a (Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High) (Unit 2 only), Functional Unit 6.a (Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 1 only), Functional Unit 6.b (Motor Driven Auxiliary Feedwater Pumps 4 kV Buss Loss of Voltage), and Functional Unit 7.a (Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low) (Unit 1 only). CTS Table 3.3-3 provides the Setpoint (i.e., Allowable Value) for the P-12 Interlock (T_{avg} - Low Low). ITS Table 3.3.2-1 provides the Allowable Values for all the ESFAS Instrumentation Functions, including ITS Table 3.3.2-1 Functions 1.d, 1.e.(1), 4.d, 4.e, 5.b, 6.c, 6.e, and 8.c. This change revises the above specified CTS ESFAS Table 3.3-4 Allowable Values to the ITS Allowable Values.	Table 3.3.2-1 Functions 1.d, 1.e.(1) (Unit 2 only), 4.d (Unit 2 only), 4.e, 5.b (Unit 2 only), 6.c (Unit 1 only), 6.e, and 8.c	Table 3.3-4 Functional Units 1.d, 1.f (Unit 2 only), 4.d, 4.e (Unit 2 only), 5.a (Unit 2 only), 6.a (Unit 1 only), 6.b, 7.a (Unit 1 only) and Table 3.3-3 P-12 Interlock	14

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L.1	Unit 1 CTS 3.3.3.8 Actions a and b and Unit 2 CTS 3.3.3.6 Actions a and b require placing the unit in HOT SHUTDOWN within the next 12 hours if an inoperable PAM instrumentation channel has not been restored within the allowed outage time. CTS 3.6.4.1 Action a requires placing the unit in HOT STANDBY within the next 6 hours if an inoperable hydrogen analyzer has not been restored within the allowed outage time. ITS 3.3.3 ACTION B, which is applicable to Functions with two or more required channels (i.e., all Functions except Functions 14 and 23, as identified in the Note to ITS 3.3.3 Condition A), requires the initiation of a report to the NRC if one inoperable PAM instrumentation channel has not been restored within the associated Completion Time. This changes the CTS by deleting the requirements for the unit to be in HOT STANDBY or HOT SHUTDOWN with one of the two required channels inoperable and not restored within the allowed outage time, and instead requiring a report to be made in accordance with ITS 5.6.6.	3.3.3 ACTION B	3.3.3.6 (Unit 2) and 3.3.3.8 (Unit 1) Actions a and b, 3.6.4.1 Action a	3
3.3.3 L.2	Unit 1 CTS 3.3.3.8 Action a and Unit 2 CTS 3.3.3.6 Action a require placing the unit in HOT SHUTDOWN within the next 12 hours if both Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) channels are inoperable and have not been restored within the allowed outage time. ITS 3.3.3 ACTION H requires initiation of a report to the NRC if one of the two inoperable channels of the Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) Function has not been restored within the associated Completion Time. This changes the CTS by deleting the requirements for the unit to be in HOT SHUTDOWN with two Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) Function channels inoperable and not restored within the allowed outage time, and instead requiring a report to be made in accordance with ITS 5.6.6.	3.3.3 ACTION H	3.3.3.6 (Unit 2) and 3.3.3.8 (Unit 1) Action a	3
3.3.3 L.3	Unit 1 CTS 3.3.3.8 Action b and Unit 2 CTS 3.3.3.6 Action b require, whenever one required channel is inoperable, restoration of one Refueling Water Storage Tank Water Level PAM instrumentation channel to OPERABLE status within 72 hours. ITS 3.3.3 ACTION A requires the restoration of the inoperable Refueling Water Storage Tank Water Level PAM instrumentation channel within 30 days. This changes the CTS by extending the restoration time for an inoperable Refueling Water Storage Tank Water Level PAM instrumentation channel from 72 hours to 30 days.	3.3.3 ACTION A	3.3.3.6 (Unit 2) and 3.3.3.8 (Unit 1) Action b	3
3.3.3 L.4	Unit 1 CTS 3.3.3.8 Action b.2 and Unit 2 CTS 3.3.3.6 Action b.2, in the event of an inoperable Refueling Water Storage Tank Water Level PAM instrumentation channel, require action to be taken within one hour to bypass the Residual Heat Removal (RHR) pump trip function from the Refueling Water Storage Tank Water Level instrumentation for the pump associated with the out-of-service instrument. ITS 3.3.3 does not include this requirement. This changes the CTS by eliminating the Action requirement to bypass the RHR trip function when the Refueling Water Storage Tank Water Level PAM instrumentation channel is inoperable.	N/A	3.3.3.6 (Unit 2) and 3.3.3.8 (Unit 1) Action b.2	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L.5	Unit 1 CTS 3.3.3.8 Action b and Unit 2 CTS 3.3.3.6 Action b provide actions for the condition of one Refueling Water Storage Tank Water Level PAM instrumentation channel. When both Refueling Water Storage Tank Water Level PAM instrumentation channels are inoperable, no actions are provided and unit shutdown in accordance with CTS 3.0.3 is required. ITS 3.3.3 ACTION D, when two channels of Refueling Water Storage Tank Water Level PAM instrumentation are inoperable, requires the restoration of one of the two inoperable Refueling Water Storage Tank Water Level PAM instrumentation channels to OPERABLE status within 7 days. If not restored, then ITS 3.3.3 ACTION G requires the unit to be in MODE 3 in 6 hours and MODE 4 in 12 hours. This changes the CTS by providing a restoration time when two Refueling Water Storage Tank Water Level PAM instrumentation channels are inoperable, prior to requiring a unit shutdown.	3.3.3 ACTIONS D and G	3.0.3 for Table 3.310 (Unit 1) and Table 3.3-11 (Unit 2) Instrument 8	4
3.3.3 L.6	Unit 1 CTS Table 4.3-7 and Unit 2 CTS Table 4.3-10 requires a CHANNEL CALIBRATION of the identified PAM instruments every 18 months. CTS Table 4.3-3 requires a CHANNEL CALIBRATION of the Containment High Range Area Monitors every 18 months. ITS Table 3.3.3-1 Functions 2 through 8, 10, 12, 15 through 19, 22, and 23 require the performance of SR 3.3.3.3, a CHANNEL CALIBRATION, every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.3.3	Table 4.3-7 (Unit 1) and Table 4.3-10 (Unit 2) CHANNEL CALIBRATION requirements, Table 4.3-3 CHANNEL CALIBRATION requirement for Instrument 1.A.ii	11
3.3.3 L.7	CTS 3.3.3.1 and CTS Table 3.3-6, Instrument 1.A.ii provides alarm setpoint requirements for the Containment High Range Area Monitors. CTS 3.3.3.1 Action a provides actions to take when the Containment High Range Area Monitors alarm setpoint exceeds the specified value. ITS 3.3.3 does not include alarm setpoint for the Containment Area Radiation (High Range) instrumentation. This changes the CTS by eliminating the alarm setpoint requirements for the Containment High Range Area Monitors.	N/A	LCO 3.3.3.1, 3.3.3.1 Action a, Table 3.3-6 Alarm Setpoint column for Instrument 1.A.ii	1
3.3.3 L.8	CTS 4.3.3.1 and CTS Table 4.3-3 require the performance of a CHANNEL FUNCTIONAL TEST of Containment High Range Area Monitors. ITS 3.3.3 does not require a CHANNEL FUNCTIONAL TEST be performed for Containment Area Radiation (High Range) PAM instrumentation. This changes the CTS by eliminating the CHANNEL FUNCTIONAL TEST for the Containment Area Radiation (High Range) PAM instrumentation.	N/A	4.3.3.1, Table 4.3-3 CHANNEL FUNCTIONAL TEST requirement for Instrument 1.A.ii	5
3.3.3 L.9	CTS Tables 3.3-6 and 4.3-3 require the Containment High Range Area Monitors to be OPERABLE in MODES 1, 2, 3, and 4. ITS 3.3.3 requires the Containment Area Radiation (High Range) PAM Function to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by deleting the requirements for the Function in MODE 4.	Table 3.3.3-1 Function 10	Tables 3.3-6 and 4.3-3 Instrument 1.A.ii	2
3.3.3 L.10	Not used.			

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3 L.11	CTS Table 3.3-6 Action 22A requires, when one or both Containment High Range Area Monitor channels become inoperable, the inoperable channels to be restored to OPERABLE status within 7 days. ITS 3.3.3 ACTION A allows 30 days to restore one inoperable channel of the Containment Area Radiation (High Range) Function to OPERABLE status. This changes the CTS by allowing one channel of the Containment Area Radiation (High Range) Function to be inoperable for a period of 30 days.	3.3.3 Required Action A.1	Table 3.3-6 Action 22A	3
3.3.3 L.12	CTS Table 4.3-3 requires the performance of a CHANNEL CHECK of the Containment High Range Area Monitors once per 12 hours. ITS SR 3.3.3.1 requires the performance of a CHANNEL CHECK of the Containment Area Radiation (High Range) Function instrumentation once per 31 days. This changes the CTS by extending the Surveillance interval for performance of a CHANNEL CHECK of the Containment Area Radiation (High Range) Function instrumentation from 12 hours to 31 days.	SR 3.3.3.1	4.3-3 CHANNEL CHECK requirement for Instrument 1.A.ii	7
3.3.3 L.13	CTS 4.6.4.1 requires each hydrogen analyzer to be demonstrated OPERABLE at least once per 92 days "on a STAGGERED TEST BASIS" by performing a CHANNEL CALIBRATION. ITS SR 3.3.3.2 requires a CHANNEL CALIBRATION of the hydrogen monitors to be performed at a Frequency of every 92 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.3.3.2	4.6.4.1	7
3.3.3 L.14	CTS Table 3.3-6, Instrument 1.A.ii specifies the Containment High Range Area Monitor channel instrument numbers to be VRA 1310/1410 (Unit 1) and VRA 2310/2410 (Unit 2). ITS Table 3.3.3-1 Function 10 does not specify the instrument numbers. This changes the CTS by deleting the Containment High Range Area Monitor channel instrument numbers from the Technical Specifications.	Table 3.3.3-1 Function 10	Table 3.3-6 Instrument 1.A.ii	1
3.3.4 L.1	CTS Table 4.3-6 requires a CHANNEL CALIBRATION of the remote shutdown monitoring pressurizer pressure, pressurizer level, steam generator pressure, and steam generator level instruments every 18 months. ITS SR 3.3.4.2 requires the performance of a CHANNEL CALIBRATION for these instruments every 24 months. This changes the CTS by extending the STI from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.4.2	Table 4.3-6 CHANNEL CALIBRATION requirements for Instruments 2, 3, 4, and 5	11
3.3.5 L.1	CTS Table 3.3-3 Action 14 states, in part, that with the number of OPERABLE channels one less than the total number of channels, "operation may proceed until performance of the next required CHANNEL FUNCTIONAL TEST." This CTS Action applies to the Loss of Voltage and Degraded Voltage Functions of CTS Table 3.3-3. ITS 3.3.5 ACTION A is the applicable action for the Loss of Voltage and Degraded Voltage Functions when one channel is inoperable, and does not include the restoration time limit of "until performance of the next required CHANNEL FUNCTIONAL TEST." This changes the CTS by allowing operation with an inoperable channel for an unlimited amount of time provided the inoperable channel is in the tripped condition.	N/A	Table 3.3-3 Action 14	4
3.3.5 L.2	Not used.			

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.5 L.3	CTS Table 3.3-3 Action 14 provides requirements for when one Loss of Voltage or Degraded Voltage channel per bus is inoperable. With more than one channel per bus of these channels inoperable, the shutdown requirements of CTS 3.0.3 would apply since the applicable CTS Table 3.3-3 Actions do not address this condition. ITS 3.3.5 ACTION B requires, with one or more Functions with two or more channels per bus or train inoperable, restoration of all but one channel per bus or train to OPERABLE status in 1 hour. This changes the CTS to allow more than one channel per bus or train of the Loss of Voltage and Degraded Voltage Functions to be inoperable. The change to the presentation of the required number of channels (i.e., on a "per train" basis instead of a "per bus" basis for the Degraded Voltage Function) is addressed in DOC A.7.	3.3.5 ACTION B	3.0.3 for Table 3.3-3 Functional Units 8.a and 8.b	4
3.3.5 L.4	CTS Table 3.3-3 Action 14 requires, with the number of OPERABLE channels one less than the total number of channels, that the inoperable channel be placed in trip within 1 hour. If this action is not accomplished, the shutdown requirements of CTS 3.0.3 would apply. ITS 3.3.5 ACTION C requires, when the Required Action and associated Completion Time are not met, that the applicable Condition(s) and Required Action(s) for the associated DG made inoperable by LOP DG start instrumentation be immediately entered. This changes the CTS by allowing the associated DG to be declared inoperable instead of entering CTS 3.0.3 and shutting down the unit.	3.3.5 ACTION C	3.0.3 for Table 3.3-3 Functional Units 8.a and 8.b	4
3.3.5 L.5	Not used.			
3.3.5 L.6	CTS Table 3.3-4 provides the Allowable Values for Functional Unit 8.a (Loss of Power 4 kV Bus Loss of Voltage). ITS SR 3.3.5.3 provides the Allowable Values for the Loss of Voltage Function. This change revises the CTS Table 3.3-4 4 kV Bus Loss of Voltage Allowable Values to the ITS Allowable Values.	SR 3.3.5.3	Table 3.3-4 Functional Unit 8.a	14
3.3.6 L.1	CTS 3.3.3.1 Action a requires, when in MODE 6, that if a radiation monitoring channel alarm/trip setpoint exceeds specified limits (effectively inoperable), then the setpoint is to be adjusted to within the limit within 4 hours (i.e., restore the channel to OPERABLE status) or the channel declared inoperable. CTS Table 3.3-6 Action 22 requires, with the number of OPERABLE containment area radiation, particulate, and noble gas channels less than the minimum number of channels in MODE 6, compliance with the Action requirements of CTS 3.9.9. The CTS 3.9.9 Action, which applies during Core Alterations or movement of irradiated fuel within the containment, requires the containment purge and exhaust penetrations to be closed. ITS 3.3.6 ACTION B is the applicable action for the Containment Radiation Functions when one required channel is inoperable during movement of irradiated fuel assemblies within containment, and allows 4 hours to restore the channel to OPERABLE status. This changes the CTS by providing a 4 hour time to restore a channel to OPERABLE status when one required Containment Radiation Function channel is inoperable during movement of irradiated fuel assemblies within containment. As a result, a corresponding change is also made to CTS Table 3.3-6 Action 22 such that this action address the condition of two or more required Containment Radiation Function channels inoperable during movement of irradiated fuel assemblies within containment.	3.3.6 ACTION B	3.3.3.1 Action a, Table 3.3-6 Action 22, 3.3.9 Action	3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L.2	CTS 3.9.9 is applicable during CORE ALTERATIONS and during movement of irradiated fuel assemblies within containment. The ITS Table 3.3.6-1 requirements for the Manual Initiation and Containment Radiation Functions are applicable, in part, during movement of irradiated fuel assemblies within containment. This changes the CTS by eliminating requirements for the Containment Purge and Exhaust Isolation System during CORE ALTERATIONS.	Table 3.3.6-1 Applicability for Functions 1 and 3	3.9.9 Applicability	2
3.3.6 L.3	CTS Table 3.3-3 Action 18 requires, with the number of OPERABLE channels of the Manual Containment Purge and Exhaust Isolation Functions less than the total number of channels, that the channels be restored to OPERABLE status within 48 hours or that the unit be placed in MODE 3 in the next 6 hours and in MODE 5 within the following 30 hours. ITS 3.3.6 ACTION D is the applicable action for the Manual Initiation Functions when inoperable channels are not restored to OPERABLE status within the associated Completion Time, and allows the containment purge supply and exhaust isolation valves to be placed in the closed position immediately. This changes the CTS by allowing the containment purge supply and exhaust isolation valves to be closed, in lieu of requiring a unit shutdown.	3.3.6 Required Action D.1	Table 3.3-3 Action 18	4
3.3.6 L.4	CTS Table 3.3-3 specifies the Functional Unit 3.c.2) (Purge and Exhaust Isolation, Containment Radioactivity - High Train A) channel instrument numbers to be VRS-1101, ERS-1301, and ERS-1305 (Unit 1) and VRS-2101, ERS-2301, and ERS-2305 (Unit 2) and the Functional Unit 3.c.3) (Purge and Exhaust Isolation, Containment Radioactivity - High Train B) channel instrument numbers to be VRS-1201, ERS-1401, and ERS-1405 (Unit 1) and VRS-2201, ERS-2401, and ERS-2405 (Unit 2). CTS Table 3.3-4 specifies the Functional Unit 3.c.2 (Purge and Exhaust Isolation, Containment Radioactivity - High Train A) channel instrument numbers to be VRS-1101, ERS-1301, and ERS-1305 (Unit 1) and VRS-2101, ERS-2301, and ERS-2305 (Unit 2) and the Functional Unit 3.c.3 (Purge and Exhaust Isolation, Containment Radioactivity - High Train B) channel instrument numbers to be VRS-1201, ERS-1401, and ERS-1405 (Unit 1) and VRS-2201, ERS-2401, and ERS-2405 (Unit 2). CTS Table 3.3-6 specifies the Instruments 1.A.i (Area Monitor, Upper Containment), 1.B.i (Process Monitors, Particulate Channel), and 1.B.ii (Process Monitors, Noble Gas Channel) channel instrument numbers to be VRS-1101, VRS-1201, ERS-1301, ERS-1401, ERS-1305, and ERS-1405 (Unit 1) and VRS-2101, VRS-2201, ERS-2301, ERS-2401, ERS-2305, and ERS-2405 (Unit 2). CTS Tables 3.3-6 and 4.3-3 specify the Instruments 2.A.i, 2.A.ii, and 2.A.iii (Containment Area Radiation, Particulate, and Noble Gas Train A) channel instrument numbers to be VRS-1101, ERS-1301, and ERS-1305 (Unit 1) and VRS-2101, ERS-2301, and ERS-2305 (Unit 2) and the Instruments 2.B.i, 2.B.ii, and 2.B.iii (Containment Area Radiation, Particulate, and Noble Gas Train B) channel instrument numbers to be VRS-1201, ERS-1401, and ERS-1405 (Unit 1) and VRS-2201, ERS-2401, and ERS-2405 (Unit 2). ITS Table 3.3.6-1 Functions 3.a, 3.b, and 3.c (Containment Radiation - Gaseous, - Particulate, and - Area Radiation) do not specify the instrument numbers for these instruments. This changes the CTS by deleting the instrument numbers for the channels of the Containment Radioactivity - High Functions from the Technical Specifications.	Table 3.3.6-1 Functions 3.a, 3.b, and 3.c	Table 3.3-3 Functional Units 3.c.2) and 3.c.3), Table 3.3-4 Functional Units 3.c.2 and 3.c.3, Table 3.3-6 Instruments 1.A.i, 1.B.i, and 1.B.ii, Tables 3.3-6 and 4.3-3 Instruments 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L.5	CTS Table 4.3-2 requires a CHANNEL CALIBRATION of the Containment Radioactivity - High Functional Unit instrumentation every 18 months and CTS Table 4.3-3 requires a CHANNEL CALIBRATION of the containment area radiation, particulate, and noble gas channels every 18 months. ITS SR 3.3.6.7 requires the performance of a CHANNEL CALIBRATION for the Containment Radiation Function instrumentation every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.6.7	Table 4.3-2 CHANNEL CALIBRATION requirement for Functional Unit 3.c.2), Table 4.3-3 CHANNEL CALIBRATION requirements for Instruments 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii	11
3.3.6 L.6	CTS Table 4.3-2 requires the performance of a TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT) of the Manual Purge and Exhaust Isolation Functional Unit at least once per 18 months. CTS 4.9.9 requires the verification of containment purge and exhaust isolation on a manual initiation signal once per 7 days during CORE ALTERATIONS. ITS SR 3.3.6.6 requires the performance of a TADOT of the Manual Initiation Function every 24 months. This changes the CTS by extending the Frequency of the Surveillance to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.6.6	Table 4.3-2 TRIP ACTUATING DEVICE OPERATIONAL TEST requirements for Functional Units 9.b and 9.c, 4.9.9	10
3.3.6 L.7	CTS Tables 3.3-6 and 4.3-3 require the Functional Units 2.A and 2.B (Containment Area Radiation, Particulate, and Noble Gas) channels to be OPERABLE in MODE 6. ITS Table 3.3.6-1 Footnote (a) requires the Function 3 (Containment Radiation) channels to be OPERABLE during movement of irradiated fuel assemblies within containment. This changes the CTS by deleting the requirement that the Containment Radiation Functions be OPERABLE in MODE 6 when irradiated fuel assemblies are not being moved in containment.	Table 3.3.6-1 Applicability for Function 3 (including Footnote (a))	Tables 3.3-6 and 4.3-3 Applicability for Functional Units 2.A and 2.B	2
3.3.6 L.8	CTS 4.9.9 states that the Containment Purge and Exhaust Isolation System shall be demonstrated OPERABLE, in part, "within 100 hours prior to the start of" the specified conditions. ITS SR 3.3.6.4 and ITS SR 3.3.6.6 do not include the "within 100 hours prior to the start of" Frequency. ITS SR 3.0.1 states "SRs shall be met during the MODES or other specified conditions in the Applicability for the individual LCOs, unless otherwise stated in the SR." Therefore, under the ITS, the Surveillances must be met prior to the initiation of movement of irradiated fuel within containment. This changes the CTS by eliminating the stipulation that the Surveillances be met within 100 hours prior to entering the MODE of Applicability.	SR 3.3.6.4, SR 3.3.6.6	4.9.9	7
3.3.6 L.9	CTS 4.9.9 states that the Containment Purge and Exhaust Isolation System shall be demonstrated OPERABLE, in part, once per 7 days during the specified conditions. ITS SR 3.3.6.4 requires, for the Containment Radiation Functions of the Containment Purge Supply and Exhaust System isolation instrumentation, the performance of a CHANNEL OPERATIONAL TEST once per 92 days. This changes the CTS by extending the Frequency of the Surveillance from 7 days (i.e., a maximum of 8.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change from a CHANNEL FUNCTIONAL TEST to CHANNEL OPERATIONAL TEST is addressed in DOC A.4.	SR 3.3.6.4	4.9.9	9

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6 L.10	CTS Table 3.3-3, Functional Units 9.b and 9.c (Manual Containment Purge and Exhaust Isolation) require a total of 2 channels per train to be OPERABLE (1 channel per train for Functional Unit 9.b and 1 channel per train for Functional Unit 9.c). ITS Table 3.3.6-1, Function 1 (Manual Initiation) requires only one channel per train to be OPERABLE. This changes the CTS be decreasing the number of manual channels required OPERABLE from two per train to one per train.	Table 3.3.6-1 Function 1	Table 3.3-3 Functional Units 9.b and 9.c	N/A
3.3.6 L.11	CTS Table 4.3-3 footnote * requires performance of a SOURCE CHECK as part of the shiftly CHANNEL CHECK requirements for Containment Radiation instrumentation (Instruments 2.A.i, 2.A.ii, 2.A.iii, 2.B.i, 2.B.ii, and 2.B.iii). ITS 3.3.6 does not include this requirement. This changes the CTS by deleting the shiftly SOURCE CHECK requirement on the Containment Radiation instrumentation.	N/A	Table 4.3-3 footnote *	N/A
3.3.6 L.12	When a Containment Purge Supply and Exhaust System isolation channel is inoperable, CTS Table 3.3-3 ACTIONS 17 and 18, CTS Table 3.3-6 ACTION 22, and CTS 3.9.9 Action essentially require the associated valves to be closed. ITS 3.3.6 ACTIONS Note 2 states “The containment pressure relief penetration flow path may be unisolated intermittently under administrative controls to maintain containment pressure within the required limits of LCO 3.6.4, “Containment Pressure.” This changes the CTS by allowing the Containment Pressure relief penetration flow path (which is one of the Containment Purge Supply and Exhaust System penetration flow paths) to be unisolated on an intermittent basis under administration control when a Containment Purge Supply and Exhaust System Isolation channel is inoperable.	3.3.6 ACTIONS Note 2	Table 3.3-3 ACTIONS 17 and 18, Table 3.3-6 ACTION 22, 3.9.9 Action	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.7 L.1	CTS 3.7.5.1 Action a requires, with one train of the Automatic Actuation Logic and Actuation Relays instrumentation inoperable (i.e., the associated CREV pressurization train is inoperable), to either restore the pressurization train to OPERABLE status (i.e., by restoring Automatic Actuation Logic and Actuation Relays instrumentation train to OPERABLE status) within 7 days or the unit must be placed in MODE 3 in the next 6 hours and in MODE 5 within the following 30 hours. In addition, the CTS does not provide any Actions when both trains of the Automatic Actuation Logic and Actuation Relays instrumentation are inoperable (i.e., both CREV trains are inoperable) in MODES 1, 2, 3, and 4. Thus a CTS 3.0.3 entry is required, which requires action to be initiated within 1 hour to place the unit in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. ITS 3.3.7 ACTION A allows 7 days to place the associated CREV train in the pressurization/cleanup mode when one Automatic Actuation Logic and Actuation Relays instrumentation train is inoperable. When both Automatic Actuation Logic and Actuation Relays instrumentation trains are inoperable, ITS 3.3.7 ACTION B allows either immediately placing one CREV train in the pressurization/cleanup mode and declaring the other CREV train inoperable (and taking the actions of the ITS 3.7.10 for an inoperable CREV train) or immediately placing both CREV trains in the pressurization/cleanup mode. Alternately, if the CREV trains are not placed in the pressurization/cleanup mode, ITS 3.3.7 ACTION C requires shutting down the unit to MODE 3 within 6 hours and MODE 5 within 36 hours. In addition, since there are two Automatic Actuation Logic and Actuation Relays Functions required (one from each unit), and each of them affect both CREV trains, a Note is included that allows separate Condition entry for each Function. This changes the CTS by allowing the associated CREV System trains to be placed in the pressurization/cleanup mode, in lieu of requiring a unit shutdown. In addition, separate Condition entry is allowed for each of the two Automatic Actuation Logic and Actuation Relays Functions.	3.3.7 ACTIONS Note, 3.3.7 ACTIONS A, B, and C	3.7.5.1 Action a, 3.0.3	4
3.3.7 L.2	Not used.			
3.3.8 L.1	CTS Table 3.3-1 Action 5.a specifies the compensatory action for an inoperable required source range neutron flux monitoring channel of the Boron Dilution Monitoring Instrumentation. One of the compensatory actions is the immediate suspension of positive reactivity changes. ITS 3.3.8 Required Action B.1 requires the immediate suspension of operations involving positive reactivity additions. ITS 3.3.8 Required Action B.1 is modified by Note 1, which states that unit temperature changes are allowed provided the temperature change is accounted for in the calculated SHUTDOWN MARGIN (SDM). This changes the CTS compensatory actions by allowing a positive reactivity change due to unit temperature changes, as long as SDM limitations are met.	3.3.8 Required Action B.1 Note 1	Table 3.3-1 Action 5.a	4

Table L - Less Restrictive Changes
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.8 L.2	CTS Table 3.3-1 Action 5.a provides the allowance to add water from the Refueling Water Storage Tank (RWST) provided the RWST boron concentration is "greater than" the minimum required by other Technical Specifications. Note 2 to ITS 3.3.8 Required Action B.1 allows water to be added from the RWST provided the RWST boron concentration is "greater than or equal to" ≥ 2400 ppm. This changes the CTS by allowing water to be added from the RWST provided the RWST boron concentration is "greater than or equal to" the required limit, instead of "greater than" the required limit.	3.3.8 Required Action B.1 Note 2	Table 3.3-1 Action 5.a	4
3.3.8 L.3	CTS Table 4.3-1 requires a CHANNEL CALIBRATION of the Source Range Neutron Flux instrumentation every 18 months. ITS SR 3.3.8.2 requires the performance of a CHANNEL CALIBRATION for the required source range neutron flux monitoring channel every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.3.8.2	Table 4.3-1 CHANNEL CALIBRATION requirement for Functional Unit 6	11

Table L - Less Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.1 L.1	CTS 3.2.5 Action requires the unit to reduce THERMAL POWER to < 5% of RTP within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to ≤ 5% RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours. This changes the CTS by extending the time for the unit to be placed outside the MODE of Applicability. The change which allows the THERMAL POWER reduction to be only to 5% RTP is discussed in DOC A.2.	3.4.1 ACTION B	3.2.5 Action	3
3.4.1 L.2	CTS 4.2.5.3 requires the RCS total flow rate to be determined by a power balance around the steam generators every 18 months. ITS SR 3.4.1.4 requires the verification by precision heat balance that RCS total flow rate is greater than the limits to be performed every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change to the procedural details on how to perform the test (power balance around the steam generators) is discussed in DOC LA.2.	SR 3.4.1.4	4.2.5.3	10
3.4.2 L.1	CTS 4.1.1.5 states that the RCS T_{avg} shall be determined to be ≥ 541°F within 15 minutes prior to achieving reactor criticality, and every 30 minutes when the reactor is critical and the RCS T_{avg} < 545°F (Unit 1) and < 551°F (Unit 2) or when the low T_{avg} alarm is inoperable (Unit 1) or with the T_{avg} - T_{ref} deviation alarm not reset (Unit 2). ITS SR 3.4.2.1 requires RCS T_{avg} in each loop to be verified ≥ 541°F every 12 hours. This changes the CTS by deleting the within 15 minutes prior to achieving criticality Frequency and the Surveillance Frequencies based on the condition of the reactor (critical), the reactor coolant temperature, and when the low T_{avg} alarm is inoperable (Unit 1) or the T_{avg}-T_{ref} deviation alarm not reset (Unit 2), and replacing them with a periodic 12 hour Frequency.	SR 3.4.2.1	4.1.1.5	7
3.4.3 L.1	CTS 4.4.9.1.b requires the RCS temperature and pressure conditions to be determined to be to the right of the criticality limit line within 15 minutes prior to achieving reactor criticality. ITS 3.4.3 does not include this requirement. This changes the Unit 1 CTS by deleting the Surveillance.	N/A	4.4.9.1.b (Unit 1 only)	5
3.4.3 L.2	CTS Figures 3.4-2 and 3.4-3 describe in the Header that the P/T curves are generated without margins for instrument error, and describe the limiting material, initial ART value, and the limiting ART value that are used to determine the P/T limits. CTS Figure 3.4-2 also states (in the figure portion) that the criticality limit is based on inservice hydrostatic test temperature of 259°F (Unit 1) and 260°F (Unit 2). The ITS Figures 3.4.3-1 and 3.4.3-2 do not include this information. This changes the CTS by deleting this information from the CTS.	N/A	Figures 3.4-2 and 3.4-3	1
3.4.4 L.1	CTS 3.4.1.1 Action states that when the reactor coolant loop requirements are not met, the unit must be in HOT STANDBY within 1 hour. ITS 3.4.4 ACTION A states that when the RCS loop requirements are not met, the unit must be in MODE 3 within 6 hours. This changes the CTS by relaxing the Completion Time from 1 hour to 6 hours.	3.4.4 ACTION A	3.4.1.1 Action	3

Table L - Less Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.5 L.1	CTS 3.4.1.2.c requires at least three RCS loops to be OPERABLE and in operation when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal. ITS LCO 3.4.5 requires two RCS loops to be OPERABLE and ITS LCO 3.4.5.a requires two RCS loops to be in operation when the Rod Control System is capable of rod withdrawal. This changes the CTS by reducing the required number of RCS loops to be OPERABLE and in operation when the Rod Control System is capable of rod withdrawal from three to two.	LCO 3.4.5, LCO 3.4.5.a	3.4.1.2.c	1
3.4.5 L.2	CTS 3.4.1.2.d requires at least three RCS loops to be OPERABLE and in operation above P-12. CTS 3.4.1.2 Action c requires the restoration of the required number of coolant loops within 2 hours or lower the RCS temperature below P-12. ITS LCO 3.4.5 does not include these requirements. This changes the CTS by deleting the requirements for three RCS loops when the unit is operating above P-12.	N/A	3.4.1.2.d, 3.4.1.2 Action c	1
3.4.5 L.3	CTS 3.4.1.2 Footnote * states that all reactor coolant pumps may be de-energized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. However, CTS LCO 3.4.1.2 Footnote ** clarifies that for purpose of this Specification, addition of water from the refueling water storage tank (RWST) does not constitute a dilution activity provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.8.b.2. CTS 3.4.1.2 Action d states that when no reactor coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. CTS 3.4.1.2 Action d, Footnote **, also provides the same clarification as is in CTS LCO 3.4.1.2 Footnote **. The ITS LCO 3.4.5 Note states that all reactor coolant pumps may be removed from operation provided no operations are permitted that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1," SHUTDOWN MARGIN (SDM)." ITS 3.4.5 Required Action D.2 states that operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1 must be suspended. This relaxes the CTS Actions by revising the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1. The detail concerning the RWST boron concentration is also deleted.	LCO 3.4.5 Note, 3.4.5 Required Action D.2	3.4.1.2 footnote *, LCO 3.4.1.2 footnote **, 3.4.1.2 Action d (including footnote **)	4
3.4.5 L.4	CTS 4.4.1.2.1 states that the required reactor coolant pumps, if not in operation, shall be determined to be OPERABLE by verifying correct breaker alignment and indicated power availability. ITS SR 3.4.5.3 requires verification of correct breaker alignment and indicated power availability to each required pump. It is modified by a Note that states "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.5.3 Note	4.4.1.2.1	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.6 L.1	CTS LCO 3.4.1.3.c requires at least three reactor coolant loops to be in operation when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal. CTS 3.4.1.3 Action b specifies the compensatory actions for less than the number of required OPERABLE or operating coolant loops specified in CTS LCO 3.4.1.3.c. ITS LCO 3.4.6 requires two loops consisting of any combination of RCS loops and residual heat removal (RHR) loops to be OPERABLE, and one loop to be in operation. This changes the CTS by deleting more restrictive coolant loop requirements based on the status of the Rod Control System. In addition, due to this change, the CTS LCO 3.4.1.3.b reference to the position of the reactor trip breakers or the capability of the control rod drive system is deleted.	LCO 3.4.6	LCO 3.4.1.3.b, LCO 3.4.1.3.c, 3.4.1.3 Action b	N/A
3.4.6 L.2	CTS LCO 3.4.1.3 Footnote ** states that all reactor coolant pumps and RHR pumps may be de-energized for up to 1 hour provided no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration. However, CTS LCO 3.4.1.3 Footnote *** clarifies that for purposes of this Specification, addition of water from the refueling water storage tank (RWST) does not constitute a dilution activity provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.8.b.2. CTS 3.4.1.3 Action c states that when no coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. CTS 3.4.1.3 Action c Footnote *** also provides the same clarification as is in CTS LCO 3.4.1.3 Footnote ***. The ITS LCO 3.4.6 Note states that all reactor coolant pumps and RHR pumps may be removed from operation provided no operations are permitted that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)." ITS 3.4.6 Required Action B.1 states that operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1 must be suspended. This relaxes the CTS Actions by revising the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1.	LCO 3.4.6 Note, 3.4.6 Required Action B.1	LCO 3.4.1.3 footnote **, 3.4.1.3 Action c (including footnote ***)	4
3.4.6 L.3	CTS 3.4.1.3 Action a states that with less than the required coolant loops OPERABLE, the unit must be placed in COLD SHUTDOWN within 20 hours. ITS 3.4.6 Required Action A.2 states that when one required loop is inoperable, the unit must be placed in MODE 5 within 24 hours, but only if an RHR loop is OPERABLE. This changes the CTS by providing an exception to the requirement to be in MODE 5 and allowing 24 hours instead of 20 hours to reach MODE 5.	3.4.6 Required Action A.2	3.4.1.3 Action a	4
3.4.6 L.4	CTS 4.4.1.3.2 states the required RCP(s), if not in operation, shall be determined to be OPERABLE once per 7 days by verifying correct breaker alignments and indicated power availability. ITS SR 3.4.6.3 requires verification of correct breaker alignment and indicated power availability to the required pump that is not in operation every 7 days. It is modified by a Note that states "Not required to be performed until 24 hours after a required pump is not in operation." This changes the CTS by not requiring the SR to be performed until 24 hours after a pump is taken out of operation.	SR 3.4.6.3 Note	4.4.1.3.2	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.6 L.5	CTS 4.4.1.3.3 states that the required steam generator(s) shall be determined OPERABLE by verifying secondary side water level is greater than or equal to 76% of wide range instrument span. ITS SR 3.4.6.2 requires verification that the steam generator (SG) secondary side water levels are above the lower tap of the SG wide range level instrumentation by ≥ 420 inches (Unit 1) and ≥ 418.77 inches (Unit 2) for the required RCS loops steam generators. This changes the CTS by changing the requirement to specifically state the required water level as referenced to a specific point external to the steam generators instead of using a specific indication from one instrument.	SR 3.4.6.2	4.4.1.3.3	N/A
3.4.7 L.1	CTS 3.4.1.4 Footnote * states that the RHR pump may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration. However, CTS 3.4.1.4 Footnote †† clarifies that for purposes of this Specification, addition of water from the refueling water storage tank (RWST) does not constitute a dilution activity provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2. CTS 3.4.1.4 Action b states that when no RHR loop is in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. ITS LCO 3.4.7 Note 1 states that the RHR pump of the loop in operation may be removed from operation provided no operations are permitted that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)." ITS 3.4.7 Required Action C.1 states that operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1 must be suspended. This relaxes the CTS Actions by revising the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1.	LCO 3.4.7 Note 1, 3.4.7 Required Action C.1	LCO 3.4.1.3 footnote *, LCO 3.4.1.4 footnote ††, 3.4.1.4 Action b	4
3.4.7 L.2	CTS 3.4.1.4 places OPERABILITY requirements for the RHR loops to be OPERABLE and operating. ITS 3.4.7 specifies the same requirements; however, ITS LCO 3.4.7 Note 4 allows all RHR loops to be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation. This changes the CTS by adding this allowance during planned heatup operations to MODE 4.	LCO 3.4.7 Note 4	N/A	1
3.4.7 L.3	CTS 3.4.1.4.b states that the secondary side water level of at least two steam generators shall be greater than or equal to 76% of wide range instrument span. ITS LCO 3.4.7.b requires the secondary side water level of at least two steam generators to be above the top of the lower tap of the SG wide range level instrumentation by ≥ 420 inches (Unit 1) and ≥ 418.77 inches (Unit 2). This changes the CTS by changing the requirement to specifically state the required water level as referenced to a specific point external to the steam generators instead of using a specific indication from one instrument.	LCO 3.4.7.b	LCO 3.4.1.4.b	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.8 L.1	CTS 3.4.1.5 Footnote * states that the RHR pump may be deenergized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration. However, CTS 3.4.1.5 Footnote †† clarifies that for purposes of this Specification, addition of water from the refueling water storage tank (RWST) does not constitute a dilution activity provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2. CTS 3.4.1.5 Action b states that when no coolant loop is in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. ITS LCO 3.4.8 Note 1 states that all RHR pumps may be removed from operation provided no operations are permitted that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1, "SHUTDOWN MARGIN (SDM)." ITS 3.4.8 Required Action B.1 states that operations that would cause introduction, into the RCS, of coolant with boron concentration less than required to meet the requirements of LCO 3.1.1 must be suspended. This relaxes the CTS Actions by revising the action from suspending reductions in boron concentration to suspending introduction of coolant with a boron concentration less than required to meet LCO 3.1.1.	LCO 3.4.8 Note 1, 3.4.8 Required Action B.1	LCO 3.4.1.5 footnote *, LCO 3.4.1.5 footnote ††, 3.4.1.5 Action b	4
3.4.9 L.1	CTS 4.4.4.2 states that the pressurizer heaters shall be demonstrated OPERABLE at least once per 18 months by energizing the required capacity of heaters in each train. ITS SR 3.4.9.2 requires the same test to be performed at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.4.9.2	4.4.4.2	10
3.4.10 L.1	CTS 3.4.2 requires a safety valve to be OPERABLE in MODES 4 and 5. ITS 3.4.10 requires three safety valves to be OPERABLE in MODE 4 with all RCS cold leg temperatures > 266°F (Unit 1) and > 299°F (Unit 2). This changes the operating conditions in which pressurizer safety valves are required to be OPERABLE. The change in the number of required safety valves is discussed in DOC M.1.	3.4.10 Applicability	3.4.2 Applicability	2
3.4.10 L.2	CTS LCO 3.4.2 and CTS LCO 3.4.3 provide requirements for the pressurizer code safety valves. The ITS LCO 3.4.10 Applicability is modified by a Note which allows the lift settings to not be within the LCO limits during MODES 3 and 4 for the purpose of in-situ setting of the pressurizer safety valves under ambient (hot) conditions. The exception is allowed for 54 hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup. This changes the CTS by allowing entry into MODES 3 and 4 without verifying that the pressurizer code safety valve lift settings are within the LCO limits.	3.4.10 Applicability Note	3.4.2, 3.4.3	2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.10 L.3	The CTS 3.4.2 Action states that with no pressurizer safety valve OPERABLE to immediately suspend all operations involving reactivity changes except addition of water from the refueling water storage tank (RWST), provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.8.b.2 (MODE 4) or 3.1.2.7.b.2 (MODE 5), and to place an OPERABLE RHR loop into operation in the shutdown cooling mode, and to immediately render all Safety Injection pumps and all but one charging pump inoperable by removing the applicable motor circuit breakers from the electric power circuit within one hour. With no pressurizer safety valves OPERABLE (i.e., all three safety valves are inoperable), ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 266°F (Unit 1) and ≤ 299°F (Unit 2) in 24 hours. This places the unit outside of the Applicability of the Specification. This changes the CTS by replacing the CTS 3.4.2 Actions with new ACTIONS designed to place the unit outside of the Applicability of the Specification when no pressurizer safety valves are OPERABLE. The change to the Applicability is discussed in DOC L.1. The change to the number of pressurizer safety valves required for OPERABILITY is discussed in DOC M.1.	3.4.10 ACTION B	3.4.2 Action	4
3.4.10 L.4	The CTS 3.4.3 Action states that with one of the three pressurizer safety valves inoperable either restore the inoperable valve to OPERABLE status within 15 minutes or be in MODE 4 within 12 hours. Currently, no Actions are specified when two or three safety valves are inoperable. Thus CTS 3.0.3 must be entered. ITS 3.4.10 ACTION A continues to allow 15 minutes to restore the inoperable pressurizer safety valve to OPERABLE status. ITS 3.4.10 ACTION B requires the unit to be in MODE 3 in 6 hours and MODE 4 with any RCS cold leg temperature ≤ 266°F (Unit 1) and ≤ 299°F (Unit 2) within 24 hours if the valve is not restored within the 15 minutes or if two or more pressurizer safety valves are inoperable. This changes the CTS by extending the time to place the unit outside of the Applicability and allows the unit not to enter LCO 3.0.3 when two or more pressurizer safety valves are found to be inoperable.	3.4.10 ACTION B	3.4.3 Action, 3.0.3	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.11 L.1	CTS 3.4.11 Action g specifies compensatory measures for inoperable PORVs and block valves not in the same line due to causes other than excessive seat leakage. The actions are to restore the valves to OPERABLE status or close and de-energize the associated block valve and place the associated PORV in manual control in each respective line within one hour. In addition, the applicable portions of CTS 3.4.11 Action c or d must be applied, relating to the OPERATIONAL MODE, as appropriate for two or three lines unavailable. ITS 3.4.11 ACTION B covers the condition associated with one or more PORVs inoperable and not capable of being manually cycled. Required Actions B.1 and B.2 are to close the associated block valve and to remove power from associated block valve. ITS 3.4.11 ACTION C covers the condition associated with one or more inoperable block valves. ITS 3.4.11 Required Action C.1 requires the PORVs to be placed in manual control. ITS 3.4.11 ACTION F covers the condition associated with one PORV inoperable and not capable of being manually cycled and one block valve inoperable in a different line than the inoperable PORV. ITS 3.4.11 ACTION H covers the conditions associated with: a) two PORVs inoperable and not capable of being manually cycled and one block valve inoperable in a different line than the inoperable PORVs; and b) one PORV inoperable and not capable of being manually cycled and two block valves inoperable in different lines than the inoperable PORV. This changes the CTS by only requiring the block valves to be closed and de-energized when its associated PORV is inoperable and only requires the PORVs to be placed in manual when its associated block valve is inoperable.	3.4.11 Required Actions B.1, B.2, and C.1	3.4.11 Action g	4
3.4.11 L.2	CTS 4.4.11.1.a requires performance of a Channel Functional Test for each PORV, excluding valve operation, every 31 days and CTS 4.4.11.1.d requires performance of a Channel Calibration of the PORV actuation instrumentation every 18 months. ITS 3.4.11 does not require the PORV automatic control system for OPERABILITY. This changes the CTS by eliminating the LCO requirement and SRs for the PORV automatic control system.	N/A	4.4.11.1.a, 4.4.11.1.d	5
3.4.11 L.3	CTS 4.4.11.1.b requires each PORV to be cycled through one complete cycle of full travel every 18 months. CTS 4.4.11.1.c requires each solenoid air control valve and check valve in the PORV control systems to be operated through one complete cycle of full travel every 18 months. ITS SR 3.4.11.2 and SR 3.4.11.3 include these same tests to be performed at a Frequency of 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.4.11.2, SR 3.4.11.3	4.4.11.1.b, 4.4.11.1.c	10

Table L - Less Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.11 L.4	CTS 4.4.11.2 states that each block valve shall be cycled unless the block valve is closed in order to meet the requirements of CTS 3.4.11 Action b, c, or d. CTS 3.4.11 Actions b, c, and d require the block valve to be closed for reasons other than excessive PORV seat leakage. ITS SR 3.4.11.1 states that each block valve shall be cycled, but it is modified by a Note stating that the SR is not required to be performed with the block valve closed in accordance with the Required Actions. This changes the CTS by not requiring a cycle of the block valve when the block valve is also closed due to excessive PORV seat leakage.	SR 3.4.11.1 Note	4.4.11.2	7
3.4.12 L.1	When an inoperable RCS vent path has not been restored to OPERABLE status within 24 hours, CTS 3.4.9.3 Action a essentially allows 8 hours (for a total of 32 hours) to depressurize the RCS and establish an RCS vent. CTS 3.4.9.3 Action b allows 8 hours to depressurize the RCS and establish an RCS vent when both PORVs and the RHR safety valve are inoperable. ITS 3.4.12 ACTION G requires the RCS to be depressurized and to establish an RCS vent within 12 hours under the same conditions. This changes the CTS by allowing 12 hours instead of 8 hours to depressurize and vent the RCS when one of the PORVs is inoperable or when both the PORVs and the RHR safety valve are inoperable.	3.4.12 ACTION G	3.4.9.3 Actions a and b	3
3.4.12 L.2	CTS 3.4.9.3 Action d states that in the event either the PORVs, the RHR safety valve, or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence. The ITS does not have a similar requirement. This changes the CTS by eliminating a Special Report.	N/A	3.4.9.3 Action d	8
3.4.12 L.3	CTS 4.4.9.3.1.b requires the performance of a CHANNEL CALIBRATION on the PORV actuation channel at least once per 18 months. ITS SR 3.4.12.9 requires this same test at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.4.12.9	4.4.9.3.1.b	11
3.4.12 L.4	CTS LCO 3.5.3 requires one ECCS subsystem to be OPERABLE in MODE 4. CTS LCO 3.5.3.a requires one Centrifugal Charging Pump to be OPERABLE, however this requirement is modified by Footnote #, which specifies that a maximum of one Centrifugal Charging Pump shall be OPERABLE when the temperature of one or more of the RCS cold legs is ≤ 152ºF. ITS LCO 3.4.12.A requires a maximum of one charging pump capable of injecting into the RCS. In addition, ITS LCO 3.4.12.A allows two charging pumps to be capable of injecting into the RCS for ≤ 1 hour for pump swap operations. This changes the CTS by allowing an additional charging pump to be capable of injecting into the RCS for up to 1 hour during pump swap operations only.	LCO 3.4.12.A	LCO 3.5.3.a footnote #	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.12 L.5	CTS 4.5.3.2 requires all charging pumps and safety injection pumps, except the required OPERABLE charging pump, to be demonstrated inoperable. The Surveillance is required to be performed every 12 hours when the temperature of one or more RCS cold legs is ≤ 152°F as determined at least once per hour when any RCS cold leg temperature is between 152°F and 200°F. ITS SR 3.4.12.1 and SR 3.4.12.2 require the same tests to be performed once every 12 hours. This changes the CTS by deleting the requirement to evaluate the RCS cold legs temperature at least once per hour when any cold leg temperature is between 152°F and 200°F.	SR 3.4.12.1, SR 3.4.12.2	4.5.3.2	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.12 L.6	CTS LCO 3.5.3 requires one ECCS subsystem to be OPERABLE in MODE 4. CTS LCO 3.5.3.a requires one centrifugal charging pump to be OPERABLE; however this requirement is modified by Footnote #, which specifies that a maximum of one centrifugal charging pump shall be OPERABLE and both safety injection pumps shall be inoperable whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. CTS 4.5.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. CTS 3.5.3 Action c provides the compensatory actions to be taken when more than one charging pump is OPERABLE or with one or more safety injection pumps OPERABLE when the temperature of any RCS cold leg is ≤ 152ºF. CTS LCO 3.1.2.3.a requires one charging pump in the boron injection flow path required by Specification 3.1.2.1 to be OPERABLE and CTS LCO 3.1.2.3.b requires one charging flow path associated with support of Unit 2 shutdown functions to be available. LCO 3.1.2.3.b is modified by a footnote that states that a maximum of one centrifugal charging pump shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is ≤ 152ºF. LCO 3.1.2.3.a is applicable in MODES 5 and 6, and CTS LCO 3.1.2.3.b is applicable at all times when Unit 2 (Unit 1) and Unit 1 (Unit 2) is in MODES 1, 2, 3, or 4. CTS 4.1.2.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump, to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits except when the reactor vessel head is removed or the temperature of one or more of the RCS cold legs is > 152ºF. CTS 3.1.2.3 Action b provides the compensatory actions to be taken when more than one charging pump is OPERABLE or with one or more safety injection pumps OPERABLE when the temperature of any RCS cold leg is ≤ 152ºF unless the reactor vessel head is removed. ITS LCO 3.4.12.B allows both charging pumps to be capable of injecting into the RCS, provided two PORVS with lift setting ≤ 435 psig are OPERABLE (ITS LCO 3.4.12.B.2), the RHR suction relief valve with a setpoint ≤ 450 psig is OPERABLE (ITS LCO 3.4.12.B.3), and all RCS cold leg temperatures are ≥ 140ºF (ITS LCO 3.4.12.B.4). ITS 3.4.12 ACTION B covers the situation when two charging pumps are capable of injecting into the RCS and only one charging pump is allowed to be capable of injecting into the RCS. In addition, ITS 3.4.12 ACTIONS Note has been added that states that LCO 3.0.4.b is not applicable when entering MODE 4. This changes the CTS by allowing two charging pumps to be capable of injecting into the RCS when all RCS cold leg temperatures are ≥ 140°F and three LTOP relief valves (two PORVS and one RHR suction relief valve) are OPERABLE.	LCO 3.4.12.B, 3.4.2 ACTION B	3.5.3, 3.5.3.a, 4.5.3.2, 3.5.3 Action c, LCO 3.1.2.3.a, LCO 3.1.2.3.b, 4.1.2.3.2, 3.1.2.3 Action b	N/A
3.4.13 L.1	CTS 4.4.6.2.1.a requires monitoring of the containment atmosphere particulate radioactivity monitor at least once per 12 hours. CTS 4.4.6.2.1.b requires monitoring the containment sump inventory and discharge at least once per 12 hours. CTS 4.4.6.2.1.e requires monitoring the reactor head flange leakoff system at least once per 24 hours. The ITS does not contain these Surveillance Requirements. This changes the CTS by eliminating these Surveillance Requirements.	N/A	4.4.6.2.1.a, 4.4.6.2.1.b, 4.4.6.2.1.e	5

Table L - Less Restrictive Changes
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.13 L.2	CTS 4.4.6.2.1.d requires the performance of a Reactor Coolant System water inventory balance at least once per 72 hours during steady state operation. ITS SR 3.4.13.1 also requires that RCS operational leakage be verified to be within its limits by performance of an RCS water inventory balance every 72 hours during steady state operation. In addition, ITS SR 3.4.13.1 contains a Note that states that the Surveillance is not required to be performed until 12 hours after establishment of steady state operation. This changes the CTS by providing an exception to the Surveillance Frequency.	SR 3.4.13.1 Note	4.4.6.2.1.d	7
3.4.14 L.1	CTS 3.4.6.2.f is applicable in MODES 1, 2, 3, and 4. ITS 3.4.14 is applicable in MODES 1, 2, and 3, and in MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. This changes CTS by exempting the RHR isolation PIVs from the leakage requirements when in or during the transition to or from the RHR mode of operation.	3.4.14 Applicability	LCO 3.4.6.2.f Applicability	2
3.4.14 L.2	CTS 3.4.6.2 Action c requires verification that the isolated condition of the closed valves be verified "once per 24 hours." ITS 3.4.14 Required Actions A.1 and A.2 require the valves to be closed within 24 hours and 72 hours, respectively. This changes the CTS by eliminating the "once per 24 hours" verification of closure and extends the requirement to close the second valve from 24 hours to 72 hours.	3.4.14 Required Action A.1 and A.2	3.4.6.2 Action c	3
3.4.14 L.3	CTS 4.4.6.2.2 requires the performance of the RCS PIV leakage test pursuant to Specification 4.0.5. ITS SR 3.4.14.1 requires the same testing, however, a Note has been included that requires the performance of the leakage test only in MODES 1 and 2. This changes the CTS by adding a Note that requires RCS PIV testing only in certain MODES.	SR 3.4.14.1 Note	4.4.6.2.2	7
3.4.14 L.4	CTS 4.5.2.d.1 requires verification, when the Reactor Coolant System pressure is above 600 psig, that the automatic interlock action to prevent opening of the suction of the RHR System from the Reactor Coolant System is OPERABLE. This test is required to be performed every 18 months. ITS SR 3.4.14.2 requires this test to be performed every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.4.14.2	4.5.2.d.1	10
3.4.14 L.5	CTS 4.5.2.d.1 requires verification, when the Reactor Coolant System pressure is above 600 psig, that the automatic interlock action to prevent opening of the suction of the RHR System from the Reactor Coolant System is OPERABLE. When the interlock is inoperable, LCO 3.0.3 entry is required since this inoperability affects both RHR trains. ITS 3.4.14 ACTION C has been added which requires the isolation of the penetration by use of one closed manual or deactivated power operated valve within 4 hours. This changes the CTS by allowing the penetration to be isolated and to continue operation of the unit for an unlimited amount of time without entry into LCO 3.0.3.	3.4.14 ACTION C	3.0.3	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.15 L.1	CTS LCO 3.4.6.1.a, CTS Table 3.3-6 Instrument 1.B.i, and Table 4.3-3 Instruments 1.B.i, 2.A.ii, and 2.B.ii specify the containment atmosphere particulate radioactivity monitoring channel instrument numbers to be ERS-1301 and ERS-1401 (Unit 1) and ERS-2301 and ERS-2401 (Unit 2). CTS LCO 3.4.6.1.c, CTS Table 3.3-6 Instrument 1.B.ii, and CTS Table 4.3-3 Instruments 2.A.iii and 2.B.iii specify the containment atmosphere gaseous (noble gas) radioactivity monitoring channel instrument numbers to be ERS-1305 and ERS-1405 (Unit 1) and ERS-2305 and ERS-2405 (Unit 2). ITS LCO 3.4.15 and the associated Surveillances do not specify the instrument numbers. This changes the CTS by deleting the containment atmosphere particulate and gaseous radioactivity monitoring channels instrument numbers from the Technical Specifications.	N/A	LCO 3.4.6.1.a and c, Table 3.3-6 Instruments 1.B.i and 1.B.ii, Table 4.3-3 Instruments 1.B.i, 2.A.ii, 2.A.iii, 2.B.ii, and 2.B.iii	1
3.4.15 L.2	CTS LCO 3.4.6.1.a requires one of the containment atmosphere particulate radioactivity channels to be OPERABLE while CTS LCO 3.4.6.1.c requires either the containment humidity monitor or one of the containment atmosphere gaseous radioactivity monitoring channels to be OPERABLE. CTS 4.4.6.1.a requires the containment atmosphere particulate and gaseous (if being used) monitoring system to be tested (CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST) at the Frequencies specified in Table 4.3-3. CTS 4.4.6.1.c requires a CHANNEL CALIBRATION of the containment humidity monitor (if being used). Unit 2 ITS LCO 3.4.15.b requires one containment atmosphere radioactivity monitor (gaseous or particulate) and Unit 2 ITS LCO 3.4.15.c requires one containment humidity monitor to be OPERABLE. Unit 2 ITS SR 3.4.15.1 requires the performance of a CHANNEL CHECK of the required containment atmosphere radioactivity monitor. Unit 2 ITS SR 3.4.15.2 requires the performance of a COT of the required containment atmosphere radioactivity monitor. Unit 2 ITS SR 3.4.15.4 requires the performance of a CHANNEL CALIBRATION of the required containment atmosphere radioactivity monitor. Unit 2 ITS SR 3.4.15.5 requires the performance of a CHANNEL CALIBRATION of the required containment humidity monitor. This changes the CTS by allowing all of the containment atmosphere particulate radioactivity channels to be inoperable without requiring any compensatory actions to be taken. That is, the containment atmosphere gaseous radioactivity monitoring channel can replace a particulate channel. It also revises the SRs as necessary to clarify that only the required channels must be tested.	LCO 3.4.15.b and c (Unit 2 only). SR 3.4.15.1 (Unit 2 only), SR 3.4.15.2 (Unit 2 only), SR 3.4.15.4 (Unit 2 only), SR 3.4.15.5 (Unit 2 only)	LCO 3.4.6.1.a and c (Unit 2 only), 4.4.6.1.a (Unit 2 only), 4.4.6.1.c (Unit 2 only)	1
3.4.15 L.3	Not used.			
3.4.15 L.4	CTS 3.4.6.1 Action requires a grab sample of the containment atmosphere to be obtained and analyzed at a specified frequency when the required gaseous and/or particulate radioactivity monitoring channels are inoperable. ITS 3.4.15 Required Actions B.1.1 and C.1 also include this requirement, however ITS 3.4.15 Required Actions B.1.2 and C.2 provide an option to perform an RCS water inventory balance under the same conditions. This changes the CTS by providing an option to perform an RCS water inventory balance instead of analyzing a grab sample of the containment atmosphere under the same conditions.	3.4.15 Required Actions B.1.2 and C.2	N/A	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.15 L.5	CTS 3.4.6.1 Action states the actions to take when only two of the above required Reactor Coolant System (RCS) leakage detection systems are OPERABLE (one required leakage detection system inoperable). With more than one required RCS leakage detection system inoperable entry into CTS LCO 3.0.3 would be required. ITS 3.4.15 ACTION C covers the situation when a) Unit 1 only - the required containment humidity or containment atmosphere gaseous radioactivity monitor is inoperable; and b) Unit 2 only - the required containment humidity monitor is inoperable. The ITS 3.4.15 Required Actions are to analyze grab samples of the containment atmosphere every 24 hours or to perform SR 3.4.13.1 once every 24 hours. ITS 3.4.15 ACTION D covers the situation when the required containment atmosphere (particulate - Unit 1 only) radioactivity monitor is inoperable and when a) Unit 1 only - the required containment humidity or containment atmosphere gaseous radioactivity monitor is inoperable; and b) Unit 2 only - the required containment humidity monitor is inoperable. The ITS 3.4.15 Required Actions are to restore of least one of the associated required monitors to OPERABLE status within 30 days. ITS 3.4.15 ACTION F requires the immediate entry into ITS LCO 3.0.3 when all three types of required leakage detection instrumentation are found to be inoperable (i.e., LCO 3.4.15.a, b, and c are not met). This changes the CTS 3.4.6.1 Actions by allowing more than one leakage detection system channel to be inoperable at the same time without requiring entry into LCO 3.0.3.	3.4.15 ACTION C, 3.4.15 ACTION F	3.0.3	4
3.4.15 L.6	CTS 4.4.6.1.b requires the performance of a CHANNEL CALIBRATION of the containment sump level and flow monitoring system at least once per 18 months. CTS 4.4.6.1.c requires the performance of a CHANNEL CALIBRATION of the containment humidity monitor at least once per 18 months. CTS 4.4.6.1.a and Table 4.3-3 for the Process Monitors requires the CHANNEL CALIBRATION of the particulate and gaseous channels to be performed every 18 months. ITS SR 3.4.15.3 requires a CHANNEL CALIBRATION of the required containment sump monitors every 24 months. ITS SR 3.4.15.4 requires a CHANNEL CALIBRATION of the required containment atmospheric radioactivity monitors and ITS SR 3.4.15.5 requires a CHANNEL CALIBRATION of the required containment humidity monitor every 24 months. This changes the CTS by extending the Frequency of the Surveillances from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.4.15.3, SR 3.4.15.4, SR 3.4.15.5	4.4.6.1.b, 4.4.6.1.c, 4.4.6.1.a, Table 4.3-3 Instruments 1.B.i, 2.A.ii, 2.A.iii, 2.B.ii, and 2.B.iii	11
3.4.15 L.7	CTS Table 4.3-3 requires a CHANNEL CHECK of the particulate and gaseous channels every 12 hours. In addition, per Table 4.3-3 Note *, this CHANNEL CHECK includes a SOURCE CHECK. ITS SR 3.4.15.1 requires a CHANNEL CHECK of the required containment atmosphere radioactivity monitor. This changes the CTS by deleting the SOURCE CHECK of the particulate and gaseous channels.	N/A	Table 4.3-3 Note *	5
3.4.15 L.8	Not used.			

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4.16 L.1	CTS 3.4.8 is applicable in MODES 1, 2, 3, 4, and 5. In addition, the testing for gross activity determination in CTS Table 4.4-4 is required in MODES 1, 2, 3, and 4 and the isotopic analysis for iodine requirement in CTS Table 4.4-4 is required periodically in MODES 1, 2, 3, 4, and 5 and after a 15% RTP change in MODES 1, 2, and 3. ITS 3.4.16, including the Surveillances, is applicable in MODES 1 and 2, and MODE 3 with RCS $T_{avg} \geq 500°F$. This changes the CTS by reducing the MODES in which the LCO is applicable, including the Surveillances, to only MODES 1 and 2, and MODES 3 with RCS $T_{avg} \geq 500°F$.	3.4.16 Applicability	3.4.8 Applicability, Table 4.4-4 Applicability	2
3.4.16 L.2	Not used.			
3.4.16 L.3	CTS 3.4.8 Action a (MODES 1, 2, 3, 4, and 5) and CTS Table 4.4-4, Item 4, part a, require isotopic analysis for iodine once per 4 hours when the specific activity exceeds 100/E µCi/gm. The ITS does not contain this Action. This changes the CTS by eliminating a conditionally performed Surveillance when gross activity exceeds 100/E µCi/gm.	N/A	3.4.8 Action a, Table 4.4-4 Item 4 (part a)	4
3.4.16 L.4	CTS Table 4.4-4, Item 1, requires gross activity to be determined three times per 7 days with a maximum time of 72 hours between samples (Unit 1) and at least once per 72 hours (Unit 2). ITS SR 3.4.16.1 requires verification that the reactor coolant gross specific activity is ≤ 100/E µCi/gm every 7 days. This changes the CTS by reducing the Frequency from three times per 7 days with a maximum time of 72 hours between samples (Unit 1) and at least once per 72 hours (Unit 2) to 7 days for both units.	SR 3.4.16.1	Table 4.4-4 Item 1	7
3.4.16 L.5	CTS Table 4.4-4, Item 3, requires radiochemical determination of E once per 6 months. Footnote * states that the sample is to be taken after a minimum of 2 EFPD and 20 days of POWER OPERATION have elapsed since the reactor was last subcritical for 48 hours or longer. ITS SR 3.4.16.3 requires E to be determined from a sample taken in MODE 1 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 ≥ 48 hours. ITS SR 3.4.16.3 is modified by a Note which states, "Not required to be performed until 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 ≥ 48 hours." This changes the CTS by putting a limit, 31 days, on when the Surveillance must be performed after the requisite conditions are met.	SR 3.4.16.3 Note	Table 4.4-4 Item 3	7

Table L - Less Restrictive Changes
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.1 L.1	CTS 3.5.1 Action b requires an accumulator inoperable for reasons other than boron concentration not within limits be restored to OPERABLE status within 1 hour. ITS 3.5.1 ACTION B specifies a Completion Time of 24 hours under the same condition. This changes the CTS by relaxing the Completion Time from 1 hour to 24 hours.	3.5.1 ACTION B	3.5.1 Action b	3
3.5.2 L.1	CTS 3.5.2 Action a states that when one ECCS train is inoperable, it must be returned to OPERABLE status within 72 hours. ITS 3.5.2 ACTION A states that when one or more trains are inoperable (for reasons other than Condition D - Unit 2 only), restore the trains to OPERABLE status within 72 hours. ITS 3.5.2 ACTION C states that with less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available (for reasons other than Condition D - Unit 2 only), enter LCO 3.0.3 immediately. This changes the CTS by allowing combinations of equipment from both trains to be credited as meeting the ECCS safety function provided 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. For example, under the CTS, an inoperable safety injection pump in one train and an inoperable charging pump in the other train would require a CTS 3.0.3 entry. Under the ITS, the same condition would allow 72 hours before requiring a shutdown because the remaining OPERABLE safety injection pump and charging pump are capable of producing the flow equivalent to a single OPERABLE train.	3.5.2 ACTIONS A and C	3.5.2 Action a, 3.0.3	4
3.5.2 L.2	CTS 3.5.2 Action b (Unit 1) and CTS 3.5.2 Action c (Unit 2) require that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the description of the circumstances of the event and the total accumulated actuation cycles to date. ITS 3.5.2 does not include this requirement.	N/A	3.5.2 Action b (Unit 1), 3.5.2 Action c (Unit 2)	8
3.5.2 L.3	CTS 4.5.2.d.2 requires a visual inspection of the containment sump and verifying subsystem suction inlets are not restricted by debris and the sump components show no evidence of structural distress or abnormal corrosion every 18 months. CTS 4.5.2.e.1 requires a verification that each ECCS automatic valve in the flow path actuates to its correct position on a Safety Injection signal every 18 months. CTS 4.5.2.e.2 requires a verification that each ECCS pump starts on a Safety Injection signal every 18 months. CTS 4.5.2.g.2 requires a verification that the mechanical stops for certain boron injection and safety injection throttle valves are in the correct position every 18 months. ITS SR 3.5.2.7, SR 3.5.2.4, SR 3.5.2.5, and SR 3.5.2.6, respectively, require performance of similar tests every 24 months. This changes the CTS by extending the Frequency of the Surveillances from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.5.2.4, SR 3.5.2.5, SR 3.5.2.6, SR 3.5.2.7	4.5.2.d, 4.5.2.e.1, 4.5.2.e.2, 4.5.2.g.2	10
3.5.2 L.4	CTS 4.5.2.e.1 requires verification that each ECCS automatic valve actuates to its correct position. ITS SR 3.5.2.4 requires verification that each ECCS automatic valve in the flow path "that is not locked, sealed, or otherwise secured in position" actuates to the correct position. This changes the CTS by excluding those ECCS automatic valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.5.2.4	4.5.2.e.1	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5.2 L.5	CTS 4.5.2.g.1 and 4.5.2.h describe tests that must be performed following repositioning of valves, maintenance, or modification to the ECCS. The ITS does not include these testing requirements. This changes the CTS by deleting a conditional Surveillance Requirement.	N/A	4.5.2.g.1, 4.5.2.h	5
3.5.2 L.6	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a "Safety Injection test" signal and "Safety Injection" signal, respectively. ITS SR 3.5.2.4 and SR 3.5.2.5 specify that the signal may be from either an actual or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change to remove the specific type of actuation signal (i.e., Safety Injection) to be used for these SRs is discussed in DOC LA.4.	SR 3.5.2.4, SR 3.5.2.5	4.5.2.e.1, 4.5.2.e.2	6
3.5.3 L.1	CTS 3.5.3 Action a allows 20 hours to reach MODE 5 when a centrifugal charging pump or its flow path from the refueling water storage tank is inoperable and is not restored to OPERABLE status within 1 hour of discovery. ITS 3.5.3 ACTION C allows 24 hours to reach MODE 5. This changes the CTS by extending the Completion Time from 20 to 24 hours if the centrifugal charging subsystem is not restored to OPERABLE status within 1 hour of discovery.	3.5.3 ACTION C	3.5.3 Action a	3
3.5.3 L.2	CTS 3.5.3 Action d requires that a Special Report be prepared and submitted to the NRC within 90 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to include the description of the circumstances of the actuation and the total accumulated actuation cycles to date. ITS 3.5.3 does not include this requirement.	N/A	3.5.3 Action d	8
3.5.4 L.1	The CTS 3.5.5 Action allows 1 hour to restore an inoperable RWST. ITS 3.5.4 ACTION A allows 8 hours to restore the RWST to OPERABLE status if the inoperability is due to the RWST boron concentration or temperature not within limits. This changes the CTS by increasing the Completion Time for the specified Conditions from 1 hour to 8 hours.	3.5.4 ACTION A	3.5.5 Action	3
3.5.5 L.1	CTS 3.4.6.2.e is applicable in MODES 1, 2, 3, and 4. If the requirement of the LCO (seal line resistance) is not met, CTS 3.4.6.2 Action b allows 4 hours to restore the seal line resistance to within limit or be in HOT STANDBY (MODE 3) within the next 6 hours and in COLD SHUTDOWN (MODE 5) within the following 30 hours. ITS 3.5.5 is applicable only in MODES 1, 2, and 3. If the requirement of ITS 3.5.5 is not met, ITS 3.5.5 ACTIONS A and B require similar Required Actions as the CTS. However, the requirement to be in MODE 5 is replaced with a requirement to be in MODE 4 within 12 hours. This changes the CTS by deleting MODE 4 from the Applicability and making corresponding changes to the Action.	3.5.5 Applicability, 3.5.5 ACTION B	LCO 3.4.6.2.e Applicability, 3.4.6.2 Action b	2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1 L.1	CTS 4.6.1.1.a.2 requires the primary containment equipment hatches to be verified closed and sealed every 31 days. The ITS does not include this requirement. This changes the CTS by deleting the specific Surveillance Requirement to verify primary containment equipment hatches are closed. The deletion of the sealed requirement is addressed in DOC L.2.	N/A	4.6.1.1.a.2	5
3.6.1 L.2	CTS 1.8 states "CONTAINMENT INTEGRITY shall exist when:...1.8.2 All equipment hatches are closed and sealed." ITS 3.6.1 states that the Containment shall be OPERABLE. This changes the CTS by not including an explicit reference to sealing the equipment hatch. The change associated with moving the reference to the equipment hatch into the Bases is addressed by DOC LA.1.	N/A	1.8.2	1
3.6.2 L.1	The CTS 3.6.1.3 Action states that with an air lock inoperable (for any reason), restore the air lock to OPERABLE status within 24 hours, and if not restored, the unit must be shutdown within a certain time limit. The ITS provides separate ACTIONS for different inoperabilities of the air lock. With an airlock inoperable due to a single inoperable door, ITS 3.6.2 ACTION A allows unlimited operation, provided the OPERABLE air lock door is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that the OPERABLE air lock door remains locked closed. For air lock doors in high radiation areas, this 31 day verification can be performed by administrative means. In addition, if both air locks have inoperable doors, the ACTION allows containment entry and exit for up to 7 days. With an air lock interlock mechanism inoperable, ITS 3.6.2 ACTION B allows unlimited operation, provided an OPERABLE door in the air lock is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that an OPERABLE air lock door in the air lock remains locked closed. For air lock doors in high radiation areas, this 31 day verification can be performed by administrative means. In addition, containment entry and exit through the air lock is permissible (i.e., the closed and locked OPERABLE door can be opened) under the control of a dedicated individual. Finally, due to these new ACTIONS, ITS 3.6.2 ACTION C, which requires the air lock to be restored within 24 hours, only applies to an air lock that is inoperable for reasons other than an inoperable door or an inoperable interlock mechanism. For both of these new ACTIONS as well as ACTION C, as stated in ITS ACTIONS Note 1, entry and exit (i.e., the closed and locked OPERABLE air lock doors can be opened) is also permissible to perform repairs on the affected air lock components. This changes the CTS by allowing unlimited operation, with certain restrictions, for air locks that are inoperable due to an inoperable door or interlock mechanism, and also allows separate Condition entry for each of the two air locks.	3.6.2 ACTIONS Note 1, 3.6.2 ACTIONS A, B, and C	3.6.1.3 Action	4
3.6.2 L.2	CTS 4.6.1.3.b requires testing of the containment airlock interlock once per 6 months. ITS SR 3.6.2.2 requires testing of the containment airlock interlock every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 6 months (i.e., a maximum of 7.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.2.2	4.6.1.3.b	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L.1	CTS 3.6.3.1 states that containment purge valves and locked or sealed closed valves may be opened on an intermittent basis under administrative control. ITS 3.6.3 ACTIONS Note 1 states "Penetration flow paths may be unisolated intermittently under administrative controls." This changes the CTS by allowing any penetration to be unisolated on an intermittent basis under administrative control, and not just containment purge valves and locked or sealed closed valves.	3.6.3 ACTIONS Note 1	LCO 3.6.3.1	1
3.6.3 L.2	The Unit 1 CTS 3.6.3.1 Action states that with one or more of the containment isolation valve(s) inoperable, isolate each affected penetration within 4 hours by use of one deactivated automatic valve secured in the isolation position, closed manual valve, or blind flange. The Unit 2 CTS 3.6.3.1 Actions states that with one or more of the containment isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open, and isolate each affected penetration within 4 hours by use of one deactivated automatic valve secured in the isolation position, closed manual valve, or blind flange. ITS 3.6.3 ACTION C, which only applies to penetration flow paths with only one containment isolation valve, requires that with one or more penetration flow paths with one containment isolation valve inoperable, the penetration flow path be isolated by means similar to those specified in the CTS within 72 hours. This changes the Unit 1 and Unit 2 CTS by extending the Completion Time from 4 hours to 72 hours when the inoperable containment isolation valve is in a single valve penetration. This also changes the Unit 2 CTS by providing an Action for a single valve penetration, consistent with the Unit 1 CTS, instead of entering CTS 3.0.3.	3.6.3 ACTION C	3.6.3.1 Action	3
3.6.3 L.3	The CTS 3.6.3.1 Action states that with one or more of the containment isolation valve(s) inoperable, isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position (Action b), closed manual valve (Action c), or blind flange (Action c). CTS 4.6.1.1.a.1 requires a periodic verification that the affected penetration remains isolated by the same methods. ITS 3.6.3 Required Action A.1 requires that with one or more penetration flow paths with one containment isolation valve inoperable, the affected penetration flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. ITS 3.6.3 Required Action A.2 requires a periodic verification that the affected penetration remains isolated by one of the methods of ITS 3.6.3 Required Action A.1. This changes the CTS by allowing penetration flow paths with two containment isolation valves that have one containment isolation valve inoperable to use a check valve with flow through the valve secured as the means of isolating the penetration flow path.	3.6.3 Required Actions A.1 and A.2	3.6.3.1 Action, 4.6.1.1.a.1	4
3.6.3 L.4	CTS 4.6.3.1.1 describes tests that must be performed prior to returning a valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit. The ITS does not include these testing requirements. This changes the CTS by deleting this post-maintenance Surveillance.	N/A	4.6.3.1.1	5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L.5	CTS 4.6.3.1.2 requires the demonstration of OPERABILITY of the containment isolation valves by verifying every 18 months that the automatic containment isolation valves actuate to the isolation position. ITS SR 3.6.3.5 requires the containment isolation valve test to be performed every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.3.5	4.6.3.1.2	10
3.6.3 L.6	CTS 4.6.3.1.2 requires verification that each containment isolation valve actuates to its isolation position. ITS SR 3.6.3.5 requires verification that each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by not requiring automatic valves locked, sealed or otherwise secured in position to be tested to verify that they automatically actuate to their isolation position. Changes associated with moving the details concerning the types of signals to the Bases are addressed by DOC LA.1.	SR 3.6.3.5	4.6.3.1.2	6
3.6.3 L.7	CTS 4.6.3.1.3 (Unit 1) and CTS 4.6.3.1.3.1 (Unit 2) state that the isolation time of each "power operated or automatic" containment isolation valve shall be determined to be within its limit. ITS SR 3.6.3.4 states "Verify the isolation time of each automatic power operated containment isolation valve is within limits." This changes the CTS by deleting the reference to the power operated containment isolation valves that are not automatic.	SR 3.6.3.4	4.6.3.1.3 (Unit 1), 4.6.3.1.3.1 (Unit 2)	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L.8	CTS 4.6.1.1.a requires verification that all non-automatic containment isolation valves that are required to be closed are closed every 31 days. If a non-automatic valve that is supposed to be closed is found open, CTS 3.6.1.1 Action applies. That Action states "Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours." ITS 3.6.3 ACTIONS A, B, and C do not differentiate between automatic and non-automatic valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected flow path. ITS 3.6.3 allows continued operation with the inoperable containment isolation valve, but if the affected penetrations are not isolated, a shutdown to MODE 3 in 6 hours and MODE 5 in 36 hours is required. In addition, ITS 3.6.3 ACTIONS Notes 2, 3 and 4 allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for systems made inoperable by containment isolation valves, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage for a penetration flow path results in exceeding the overall containment leakage rate acceptance criteria. This changes the CTS by providing 1 hour, 4 hours or 72 hours to isolate a penetration flow path affected by an inoperable non-automatic containment isolation valve, and allowing continued operation with an inoperable non-automatic containment isolation valve. This also changes the CTS by allowing separate condition entry for each penetration flow path with an inoperable non-automatic containment isolation valve, requiring entry into the applicable Conditions and Required Actions for systems made inoperable by inoperable non-automatic containment isolation valves, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1, "Containment," when leakage through a penetration flow path due to an inoperable non-automatic containment isolation valve results in exceeding the overall containment leakage rate acceptance criteria.	3.6.3 ACTIONS Notes 2, 3, and 4, 3.6.3 ACTIONS A, B, and C	3.6.1.1 Action	4
3.6.3 L.9	CTS 4.6.1.1.a.1 requires verification that specified containment penetrations are closed. ITS 3.6.3 Required Actions A.2 and C.2, ITS SR 3.6.3.2 and ITS SR 3.6.3.3 include similar requirements, but contain a Note that allows valves and blind flanges in high radiation areas to be verified administratively. In addition, ITS 3.6.3 Required Actions A.2 and C.2 include a second Note that allows verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means. This changes the CTS by allowing certain valves and blind flanges to not require physical verification.	3.6.3 Required Actions A.2 and C.2 Notes 1 and 2, SR 3.6.3.2 and SR 3.6.3.3 Note	4.6.1.1.a	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.3 L.10	CTS 4.6.1.1.a.1 requires a verification that all penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves, secured in their positions. ITS SR 3.6.3.2 and ITS SR 3.6.3.3 require a verification that each containment isolation manual valve and blind flange that is located outside containment (ITS SR 3.6.3.2) or inside containment (ITS SR 3.6.3.3) and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. This changes the CTS by not requiring valves locked, sealed or otherwise secured be verified closed as part of the Technical Specification Surveillance Requirements.	SR 3.6.3.2, SR 3.6.3.3	4.6.1.1.a	6
3.6.3 L.11	CTS 3.6.1.7 Action a only allows one containment purge supply and one containment purge exhaust valve to be inoperable. If more than one supply valve and one exhaust valve is inoperable, CTS 3.0.3 (which requires a unit shutdown) must be entered. ITS 3.6.3 includes ACTIONS Note 2, which allows separate Condition entry for each containment purge supply and exhaust penetration. ITS 3.6.3 ACTION B also allows both containment purge supply or exhaust valves in the same penetration to be inoperable, provided the affected penetration is isolated within one hour (and verified isolated every 31 days per ITS 3.6.3 Required Action A.2). This changes the CTS by allowing more than one containment purge supply valve and more than one containment purge exhaust valve to be inoperable simultaneously, without requiring a unit shutdown.	3.6.3 ACTIONS Note 2, 3.6.3 ACTION B	3.6.1.7 Action a	4
3.6.3 L.12	CTS 3.6.1.7 Action b allows operation to continue with a containment purge valve inoperable and the associated penetration isolated only until the next required valve test. ITS 3.6.3 ACTION A does not include this restriction. This changes the CTS by allowing operation with an inoperable containment purge valve for an unlimited amount of time provided the associated penetration is isolated.	N/A	3.6.1.7 Action a	4
3.6.3 L.13	CTS 4.6.3.1.2 requires verification of the containment isolation on a "test" or "isolation" signal. ITS SR 3.6.3.5 specifies that the signal may be from either an "actual" or simulated (i.e., test or isolation) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.3.5	4.6.3.1.2	6
3.6.6 L.1	CTS 4.6.2.1.c requires each containment spray system to be demonstrated OPERABLE at least once per 18 months by verifying that each automatic valve in the flow path automatically actuates to its correct position and by verifying that each containment spray pump starts automatically. ITS SR 3.6.6.3 requires the same type of test to be performed on the containment spray valves while ITS SR 3.6.6.4 requires the same type of test on the containment spray pumps. The Frequency of testing for both ITS SR 3.6.6.3 and ITS SR 3.6.6.4 is 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.6.3, SR 3.6.6.4	4.6.2.1.c.1, 4.6.2.1.c.2	10

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.6 L.2	CTS 4.6.2.1.c.1 requires verification that each automatic valve in the flow path actuates to its correct position on a Containment Pressure - High-High signal. ITS SR 3.6.6.3 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the Containment Pressure - High-High signal reference is addressed by DOC LA.2.	SR 3.6.6.3	4.6.2.1.c.1	6
3.6.6 L.3	CTS 4.6.2.1.c.1 requires verification of the automatic actuation of the Containment Spray System valves on a "test" signal. CTS 4.6.2.1.c.2 requires verification of the automatic actuation of the Containment Spray System pumps on a "test" signal. ITS SR 3.6.6.3 and ITS SR 3.6.6.4 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.6.3, SR 3.6.6.4	4.6.2.1.c.1, 4.6.2.1.c.2	6
3.6.7 L.1	CTS 4.6.2.2.c requires verifying that each spray additive automatic valve in the flow path actuates to its correct position at least once per 18 months. ITS SR 3.6.7.4 requires the same type of test to be performed every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.7.4	4.6.2.2.c	10
3.6.7 L.2	CTS 4.6.2.2.c requires verification that each automatic valve in the spray additive flow path actuates to its correct position on a Containment Pressure - High High test signal. ITS SR 3.6.7.4 requires verification that each spray additive automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test. Removal of the Containment Pressure - High High signal reference is discussed in DOC LA.3.	SR 3.6.7.4	4.6.2.2.c	6
3.6.7 L.3	Unit 2 CTS 4.6.2.2.c requires verification of the automatic actuation of the Spray Additive System valves on a "test" signal. While Unit 1 CTS 4.6.2.2.c does not use the term "test," it is implied. ITS SR 3.6.7.4 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.7.4	4.6.2.2.c	6
3.6.8 L.1	Not used.			

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.8 L.2	CTS 3.6.4.2 does not provide an Action for two inoperable hydrogen recombiners. Thus, CTS 3.0.3 is required to be entered when both hydrogen recombiners are inoperable. ITS 3.6.8 ACTION B requires that with two hydrogen recombiners inoperable, to verify by administrative means that the hydrogen control function is maintained within one hour, and to restore one hydrogen recombiner to OPERABLE status within 7 days. A shutdown is only required if the hydrogen control function is not maintained within 1 hour or if one hydrogen recombiner is not restored to OPERABLE status within 7 days. This changes the CTS by allowing both hydrogen recombiners to be inoperable for 7 days, provided the hydrogen control function is maintained, prior to requiring a unit shutdown, instead of entering CTS 3.0.3 immediately.	3.6.8 ACTION B	3.0.3	3
3.6.8 L.3	CTS 4.6.4.2.a requires the performance of a recombiner functional test to ensure the minimum heater sheath temperatures increase to ≥ 700°F within 90 minutes and is maintained for at least 2 hours. CTS 4.6.4.2.b.3 requires the performance of a recombiner system functional test to ensure the heater sheath temperatures increase to ≥ 1200°F within 5 hours and is maintained for at least 4 hours. CTS 4.6.4.2.b.2 requires the verification through visual examination that there is no evidence of abnormal conditions within the recombiners. CTS 4.6.4.2.b.4 requires the verification of the integrity of all heater electrical circuits by performing a continuity and resistance to ground test following the required functional tests. These tests are required to be performed every 18 months. ITS SR 3.6.8.1, SR 3.6.8.2, and SR 3.6.8.3 require the same testing requirements, however the Surveillance Frequency has been changed to 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.8.1, SR 3.6.8.2, SR 3.6.8.3	4.6.4.2.a, 4.6.4.2.b.2, 4.6.4.2.b.3, 4.6.4.2.b.4	10
3.6.8 L.4	CTS 4.6.4.2.b.1 requires performing a CHANNEL CALIBRATION of all instrumentation and control circuits on each hydrogen recombiner once per 18 months. ITS 3.6.8 does not include this requirement. This changes the CTS by deleting a Surveillance Requirement.	N/A	4.6.4.2.b.1	5
3.6.9 L.1	CTS 3.6.4.3 requires both trains of the Distributed Ignition System (DIS) to be OPERABLE. CTS 4.6.4.3.b requires verification that each DIS train have at least one OPERABLE hydrogen ignitor in each region. Thus, this Surveillance Requirement effectively defines that OPERABILITY of a DIS train includes one hydrogen ignitor per containment region. ITS 3.6.9 requires both Distributed Ignition System trains to be OPERABLE and that each containment region shall have at least one OPERABLE hydrogen ignitor. ITS SR 3.6.9.2 also requires verification that at least one hydrogen ignitor is OPERABLE in each containment region. This changes the CTS by requiring only one OPERABLE hydrogen ignitor in each containment region, instead of the current requirement of one OPERABLE hydrogen ignitor per DIS train in each containment region.	LCO 3.6.9, SR 3.6.9.2	LCO 3.6.4.3, 4.6.4.3.b	1

Table L - Less Restrictive Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.9 L.2	CTS 4.6.4.3.c requires verification that the temperature of each ignitor is a minimum of 1700°F every 18 months. ITS SR 3.6.9.3 requires the same verification every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.9.3	4.6.4.3.c	10
3.6.9 L.3	CTS 4.6.4.3.a requires energizing the supply breakers and verifying at least 34 ignitors per train are energized and CTS 4.6.4.3.b requires verifying at least one hydrogen ignitor per train is OPERABLE in each containment region. These tests are required every 92 days. ITS SR 3.6.9.1 and SR 3.6.9.2 require the performance of similar Surveillances (as modified by DOC L.1), but at a Frequency of 184 days. This changes the CTS by extending the Frequency of the Surveillances from 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 184 days (i.e., a maximum of 230 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.6.9.1, SR 3.6.9.2	4.6.4.3.a, 4.6.4.3.b	9
3.6.10 L.1	CTS 4.6.5.6 states that each Containment Air Recirculation System shall be demonstrated OPERABLE at least once per 3 months "on a STAGGERED TEST BASIS." The Surveillance Frequency for ITS SR 3.6.10.1, SR 3.6.10.2, SR 3.6.10.3, and SR 3.6.10.4 is also 92 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.6.10.1, SR 3.6.10.2, SR 3.6.10.3, SR 3.6.10.4	4.6.5.6	7
3.6.10 L.2	CTS 4.6.5.6.a requires verification of the automatic actuation of the return air fan on an auto-start signal (i.e., simulated) and that the motor operated valve in the suction line to the containment's lower compartment opens when the return air fan starts (i.e., an actual signal). ITS SR 3.6.10.1 requires verification that each Containment Air Recirculation/Hydrogen Skimmer (CEQ) System fan starts on an "actual" or simulated actuation signal. ITS SR 3.6.10.4 requires verification that the motor operated valve in the suction line to the containment lower compartment opens on an actual or "simulated" actuation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. The change from "when the return air fans starts" to "actual" signal is discussed in DOC LA.2.	SR 3.6.10.1, SR 3.6.10.4	4.6.5.6.a	6
3.6.10 L.3	CTS 4.6.5.6.d requires the return air fan to be manually started from the control room every 3 months, and to verify the motor operated valve in the suction line to the containment's lower compartment opens when the return air fan starts. ITS 3.6.10 does not include this requirement. This changes the CTS by deleting a Surveillance Requirement.	3.6.10	4.6.5.6.d	5
3.6.10 L.4	CTS 3.6.5.6 Action states that with one CEQ train inoperable, restore the inoperable train to OPERABLE status within 48 hours. ITS 3.6.10 Required Action A.1 states to restore the inoperable CEQ train to OPERABLE status within 72 hours under the same conditions. This changes the Unit 2 CTS by extending the Completion Time for restoration of an inoperable CEQ Train from 48 hours to 72 hours.	3.6.10 Required Action A.1	3.6.5.6 Action (Unit 2 only)	3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.11 L.1	CTS 3.6.5.1.d and e requires that ice baskets contain at least 1144 lbs of ice and that there be 1944 ice baskets. CTS 4.6.5.1.b.2 requires weighing a sample of at least 144 ice baskets and verifying each ice basket contains 1144 lbs of ice (end of cycle). CTS 4.6.5.1.b.2 specifies the locations of the ice basket to be sampled and if any ice basket contains less than 1144 lbs of ice, additional ice baskets must be weighed. It also requires the weighed baskets to be divided into three sub-groups, with each sub-group averaging 1144 lbs of ice per ice basket. Furthermore, a total ice weight of the 1944 baskets (2,222,000 lbs end of cycle) is also required to a 95% confidence level, and includes a maintenance allowance for mass determination accuracy. CTS 4.6.5.1.b.3 requires a verification, by a visual inspection of at least two flow passages per ice condenser bay, that the accumulation of frost or ice on the top deck floor grating, on the intermediate deck, and on flow passages between ice baskets and past lattice frames is restricted to a nominal thickness of 3/8 inches. If one flow passage per bay is found to have an accumulation of frost or ice greater than this thickness, a representative sample of 20 additional flow passages from the same bay shall be visually inspected. If these additional flow passages are found acceptable, the surveillance program may proceed considering the single deficiency as unique and acceptable. More than one restricted flow passage per bay is evidence of abnormal degradation of the ice condenser. CTS 4.6.5.1.d requires lifting (at least 12 feet) and visually inspecting the accessible portions of at least two ice baskets from each one-third of the ice condenser and verifying that the ice baskets are free of detrimental structural wear, cracks, corrosion or other damage. ITS SR 3.6.11.2 requires a verification of the total ice mass (2,200,000 lbs) by calculating the mass of stored ice in each of three radial zones by selecting, at random, 30 ice baskets in each zone. It also verifies each zone contains the required ice mass. ITS SR 3.6.11.3 requires a verification that each basket sampled in ITS SR 3.6.11.2 contains a minimum ice mass. ITS SR 3.6.11.4 requires a verification, by inspection, accumulation of ice on structural members comprising flow channels through the ice bed is ≤ 15% blockage of the total flow area for each safety analysis section. ITS SR 3.6.11.5 requires a visual inspection, for detrimental structural wear, cracks, corrosion, or other damage, two ice baskets from each group of bays (total of three groups). The Bases for ITS SR 3.6.11.5 includes clarifying guidance that indicates the intent of the inspection is to perform an inspection of the full-length of the basket. This changes the CTS in the following ways: for SR 3.6.11.2 - a) modifies the stored ice mass to 2,200,000 lbs by specifying the design basis value and removing the maintenance allowance for mass determination accuracy; and b) redefines the ice mass statistical sampling plan to include the entire ice bed (1944 baskets), divides the ice bed into three radial zones, and modifies the sample size to at least 30 baskets in each radial zone; for SR 3.6.11.3 - a) removes the reference to azimuthal distribution verification, and b) adds a new acceptance criteria value for minimum ice mass in each basket sampled by SR 3.6.11.2; and for SR 3.6.11.5 - a) removes the inherent reference to CTS 3.6.5.1.b.2 that provided the definition of azimuthal distribution, b) adds the current sampling distribution methodology directly to the SR for clarity, and c) removes the requirement to raise the ice basket at least 12 feet for the inspection.	SR 3.6.11.2, SR 3.6.11.3, SR 3.6.11.4, SR 3.6.11.5	LCO 3.6.5.1.d and e, 4.6.5.1.b.2, 4.6.5.1.b.3, 4.6.5.1.d	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.11 L.2	CTS 4.6.5.1.b.1 requires the chemical analyses on the stored ice to be performed once every 18 months. ITS SR 3.6.11.6 requires the chemical analyses on the stored ice to be performed once every 54 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months to 54 months.	SR 3.6.11.6	4.6.5.1.b.1	7
3.6.11 L.3	CTS 4.6.5.1.b.1 requires a verification by chemical analyses that the 9 representative samples of stored ice have a boron concentration of at least 1800 ppm and a pH of 9.0 to 9.5 at 25°C. ITS SR 3.6.11.6 requires the verification, by chemical analysis of the stored ice in at least one randomly selected ice basket from each ice condenser bay, that ice bed boron concentration is ≥ 1800 ppm and ≤ 2300 ppm and pH is ≥ 9.0 and ≤ 9.5. In addition, a Note is included that allows the boron concentration and pH values obtained from the individual samples to be averaged. This changes the CTS by allowing the chemical analysis to average the boron concentration and pH values of the samples instead of requiring each sample to meet the requirements.	SR 3.6.11.6	4.6.5.1.b.1	6
3.6.11 L.4	CTS 4.6.5.1.c requires a visual inspection every 18 months, of each ice condenser bay, to ensure the accumulation of frost or ice on the lower inlet plenum support structures and turning vanes is restricted to the specified thickness. CTS 4.6.5.1.b.3 requires the inspection of the top deck floor grating, on the intermediate deck and on flow passages between ice baskets and past lattice frames for accumulation of frost or ice. The ITS does not include these Surveillance Requirements; it only requires this inspection of the "flow channels," which includes the area between ice baskets, past lattice frames, and wall panels, as indicated in the Bases for ITS SR 3.6.11.4. This changes the CTS by deleting the requirement to inspect the top deck floor grating, the intermediate deck, and the lower support structures and turning vanes for accumulation of frost or ice.	N/A	4.6.5.1.b.3, 4.6.5.1.c	5
3.6.12 L.1	CTS 3.6.5.3 provides an Action for one or more inoperable ice condenser doors. ITS 3.6.12 provides similar ACTIONS, however a Note is added to the CTS Action (ITS 3.6.12 ACTIONS Note 1) that states "Separate Condition entry is allowed for each ice condenser door." This modifies the CTS by providing a specific allowance to enter the Action for each ice condenser door separately.	3.6.12 ACTIONS Note 1	3.6.5.3 Action	4
3.6.12 L.2	The CTS 3.6.5.3 Action provides specific actions to be taken if an ice condenser intermediate deck or top deck door is open or inoperable. ITS 3.6.12 ACTIONS Note 2 states that when an ice condenser intermediate deck or top deck door is inoperable for a short duration solely due to personnel standing on or opening the door to perform required Surveillances, minor preventative maintenance, or system walkdowns, entry into associated Conditions and Required Actions is not required. This changes the CTS by allowing an intermediate deck or top deck door to be inoperable for a short duration to perform routine evolutions without requiring entry into the associated Actions.	3.6.12 ACTIONS Note 2	3.6.5.3 Action	4
3.6.12 L.3	CTS 4.6.5.3.1.a requires the inlet doors of the ice condenser to be "continuously monitored" and determined to be closed by the Inlet Door Position Monitoring System. ITS SR 3.6.12.1 requires the verification that all inlet doors are closed every 12 hours. This changes the CTS by allowing the ice condenser inlet doors to be monitored less frequently. The change to the method of verifying the ice doors are closed is discussed in DOC LA.1.	SR 3.6.12.1	4.6.5.3.1.a	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.12 L.4	CTS 4.6.5.3.1.b requires verification that each ice condenser inlet door is OPERABLE every 18 months during shutdown. Testing includes verification of the torque required to initially open each door, verification that the opening of each door is not impaired by ice, frost, or debris, and verification of the opening and closing torques when the door is 40 degrees open. ITS SR 3.6.12.4, SR 3.6.12.5, and SR 3.6.12.6 require the same testing every 18 months, with no restriction as to when (i.e., during shutdown) the test can be performed. This changes the CTS by deleting the requirement to perform the Surveillances during shutdown.	SR 3.6.12.4, SR 3.6.12.5, SR 3.6.12.6	4.6.5.3.1.b	12
3.6.13 L.1	CTS 4.6.5.9 requires verification that each divider barrier seal is OPERABLE every 18 months during shutdown. CTS 4.6.5.9.a requires removal of two divider barrier seal test coupons and verifying that the physical properties of the test coupons are within the acceptable range. CTS 4.6.5.9.b requires a visual inspection of at least 95% of the seal's entire length, verification that the seal and seal mounting bolts are properly installed, and verification that the seal material shows no visual evidence of deterioration. ITS SR 3.6.13.4 and SR 3.6.13.5 require the same testing every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). The change to the requirement to perform the Surveillances during shutdown is discussed in DOC L.2.	SR 3.6.13.4, SR 3.6.13.5	4.6.5.9, 4.6.5.9.a, 4.6.5.9.b	10
3.6.13 L.2	CTS 4.6.5.9 requires verification that each divider barrier seal is OPERABLE every 18 months during shutdown. CTS 4.6.5.9.a requires the removal of two divider barrier seal test coupons and verifying that the physical properties of the test coupons are within the acceptable range. CTS 4.6.5.9.b requires a visual inspection of at least 95% of the seal's entire length, verification that the seal and seal mounting bolts are properly installed, and verification that the seal material shows no visual evidence of deterioration. ITS SR 3.6.13.4 and SR 3.6.13.5 require the same testing every 24 months, with no restriction as to when (i.e., during shutdown) the test can be performed. This changes the CTS by deleting the requirement to perform the Surveillances during shutdown. The change to the Frequency of the Surveillance is discussed in DOC L.1.	SR 3.6.13.4, SR 3.6.13.5	4.6.5.9, 4.6.5.9.a, 4.6.5.9.b	12
3.6.14 L.1	CTS 4.6.5.7 requires verification that each ice condenser floor drain is OPERABLE every 18 months during shutdown by verifying that valve gate opening is not impaired by ice, frost or debris, verifying that the valve seat is not damaged, verifying that the valve gate opens when a force of ≤ 100 lbs is applied, and verifying that the drain line from the ice condenser floor to the containment lower compartment is unrestricted. ITS SR 3.6.14.3 requires the same testing every 18 months, with no restriction as to when (i.e., during shutdown) the test can be performed. This changes the CTS by deleting the requirement to perform the Surveillance during shutdown.	SR 3.6.14.3	4.6.5.7	12

Table L - Less Restrictive Changes
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.14 L.2	CTS 3.6.5.8 states that "The refueling canal drains shall be OPERABLE." In this case, since there are three installed refueling canal drains, all three must be OPERABLE. ITS LCO 3.6.14 states "two refueling canal drains shall be OPERABLE." This changes the CTS by only requiring two of the three refueling canal drains to be OPERABLE. In addition, due to this change, the word "required" has been added to the Actions and the Surveillance Requirements since not all installed refueling drains are required to be OPERABLE.	LCO 3.6.14	LCO 3.6.5.8	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.1 L.1	CTS 3.7.1.1 Action a states that with one or more MSSVs inoperable, reduce the Power Range Neutron Flux - High Setpoint trip within 4 hours. ITS 3.7.1 Required Action A.2 also requires the Power Range Neutron Flux - High trip setpoint to be reduced, but is modified by a Note (Required Action A.2 Note) stating that this action is only required in MODE 1. This changes the CTS by only requiring the Power Range Neutron Flux - High Setpoint trip be reduced when in MODE 1.	3.7.1 Required Action A.2 Note	3.7.1.1 Action a	4
3.7.1 L.2	CTS 3.7.1.1 Action a specifies the compensatory actions when one or more MSSVs are inoperable in MODES 1 and 2. The action allows operation to continue provided that within 4 hours, either the inoperable MSSV(s) are restored to OPERABLE status or the Power Range Neutron Flux - High Setpoint trip is reduced per Table 3.7-1. ITS 3.7.1 Required Action A.2 requires the reduction of the Power Range Neutron Flux - High reactor trip setpoint to less than or equal to the Maximum Allowable % RTP specified in Table 3.7.1-1 within 36 hours. This changes the CTS by extending the time allowed to reduce the Power Range Neutron Flux - High reactor trip setpoints. The change that deletes the restoration options is discussed in DOC A.3.	3.7.1 Required Action A.2	3.7.1.1 Action a	3
3.7.2 L.1	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all SGSVs are closed. This changes the CTS by making the Specification not applicable in MODES 2 and 3 when all SGSVs are closed.	3.7.2 Applicability	3.7.1.5 Applicability	2
3.7.5 L.1	CTS 3.7.1.2.b for Unit 1 states that at least one AFW flow path in support of Unit 2 shutdown functions shall be available and CTS 3.7.1.2.b for Unit 2 states that at least one AFW flow path in support of Unit 1 shutdown functions shall be available. ITS 3.7.5 does not include these requirements. This changes the CTS by deleting these requirements from the CTS.	N/A	LCO 3.7.1.2.b, 3.7.1.2.b Action, 4.7.1.2.g	1
3.7.5 L.2	CTS 3.7.1.2.a Action a requires the inoperable AFW pumps to be restored to an OPERABLE status within 72 hours for any condition of inoperability. ITS 3.7.5 ACTION A permits 7 days to restore the steam supply valve to an OPERABLE status when the turbine driven AFW pump is inoperable due to an inoperable steam supply valve or if the turbine driven AFW pump is inoperable in MODE 3 following refueling. In addition, due to the addition of this new ACTION, a second Completion Time has been added (ITS 3.7.5 Required Action A.1, second Completion Time) that requires restoration of the affected equipment within 10 days from discovery of failure to meet the LCO. This second Completion Time has also been added to CTS 3.7.1.2.a Action a for when an AFW train is inoperable for reasons other than those described above (ITS 3.7.5 Required Action B.1, second Completion Time). This changes the CTS by extending the ACTION time from 72 hours to 7 days for the turbine driven AFW pump in these conditions and by adding the second Completion Time of 10 days from discovery of failure to meet the LCO.	3.7.5 ACTION A	3.7.1.2.a Action	4
3.7.5 L.3	CTS 3.7.1.2.a Action a and Action b require that with an inoperable AFW pump not restored to OPERABLE status within the allowed time, or with two AFW pumps inoperable, the unit is to be in HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. Under similar conditions, ITS ACTION C requires the unit to be in MODE 3 in 6 hours and MODE 4 in 18 hours. This changes the CTS by allowing 18 hours instead of 12 hours to be in MODE 4.	3.7.5 Required Action C.2	3.7.1.2.a Actions a and b	3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L.4	CTS 3.7.1.2.a Action c states that with three AFW pumps inoperable, immediately initiate corrective action to restore at least one AFW pump to OPERABLE status as soon as possible. This Action does not require the unit to be shut down. However, it does not provide an exception to CTS 3.0.3 for other Specifications. ITS 3.7.5 ACTION D requires that with three inoperable AFW trains in MODES 1, 2, or 3, immediately initiate action to restore one AFW train to OPERABLE status. A Note to ITS 3.7.5 Required Action D.1 has been added that states that LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is OPERABLE. This changes the CTS requirements to not require a unit shutdown, regardless of other inoperabilities, when all AFW trains are inoperable.	3.7.5 Required Action D.1 Note	3.7.1.2.a Action c	4
3.7.5 L.5	CTS 4.7.1.2.b provides for the surveillance testing of the turbine driven AFW pump. The requirement provides an exception to CTS 4.0.4 for the testing of the AFW turbine driven pump. CTS 4.7.1.2.f requires verification that each AFW pump will start automatically upon receipt of an appropriate signal. A Note is included in ITS SR 3.7.5.2 and SR 3.7.5.4 that allows a delay in the performance of required testing for the turbine driven AFW pump until the required steam pressure of 850 psig is reached. This changes the CTS by providing an allowance for delaying the performance of required testing without requiring the turbine driven AFW pump to be declared inoperable.	SR 3.7.5.2 Note, SR 3.7.5.4 Note 1	4.7.1.2.b, 4.7.1.2.f	6
3.7.5 L.6	CTS 4.7.1.2.e requires the verification that each AFW automatic valve in the flow path actuates to its correct position. ITS SR 3.7.5.3 requires verifying that each AFW automatic valve "not locked, sealed, or otherwise secured in position," actuates to the correct position. This changes the CTS by only requiring the testing of AFW valves that are not locked, sealed or otherwise secured in position.	SR 3.7.5.3	4.7.1.2.e	6
3.7.5 L.7	CTS 4.7.1.2.e requires the verification that each automatic valve of the AFW System in the flow path actuates to its correct position. CTS 4.7.1.2.f requires the verification that each AFW pump starts as designed automatically. ITS SR 3.7.5 3 and ITS SR 3.7.5.4 require the same verifications for the AFW valves and pumps, respectively. However, a Note has been added to the Surveillances that allows the AFW train(s) to be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. This changes the CTS by allowing these automatic features to not be OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation.	SR 3.7.5.3 Note, SR 3.7.5.4 Note 2	4.7.1.2.e, 4.7.1.2.f	6
3.7.5 L.8	CTS 4.7.1.2.e requires the verification that each automatic valve of the AFW System in the flow path actuates to its correct position. CTS 4.7.1.2.f requires the verification that each AFW pump starts as designed automatically. The Frequency of performance of these Surveillances is every 18 months. ITS SR 3.7.5 3 and ITS SR 3.7.5.4 requires the same verifications at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.5.3, SR 3.7.5.4	4.7.1.2.e, 4.7.1.2.f	10

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.5 L.9	CTS 4.7.1.2.e and 4.7.1.2.f require verification of the automatic actuation of auxiliary feedwater components on a "test" signal. ITS SR 3.7.5.3 and SR 3.7.5.4 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.5.3, SR 3.7.5.4	4.7.1.2.e, 4.7.1.2.f	6
3.7.6 L.1	With the CST inoperable, CTS 3.7.1.3 Action a requires restoration of the CST within 4 hours or be in MODE 4 within next 12 hours, while CTS 3.7.1.3 Action b requires demonstration of OPERABILITY of the backup supply within 4 hours and restoration of the CST to OPERABLE status within 7 days or be in MODE 4 within the next 12 hours. ITS 3.7.6 Required Action A.1 requires the verification of OPERABILITY of the backup water supply within 4 hours and Required Action A.2 requires the CST to be restored to OPERABLE status within 7 days. If any of these Required Actions are not met within the associated Completion Time, ITS 3.7.6 ACTION B requires that the unit must be in MODE 3 within 6 hours and in MODE 4, without reliance on steam generator for heat removal within 24 hours. This changes the time to be in MODE 4 without reliance on the steam generators for heat removal from 12 hours to 24 hours and adds an additional requirement to be in MODE 3 within 6 hours. The addition of the condition to be in MODE 4 "without reliance on the steam generators for heat removal" is discussed in DOC M.2.	3.7.6 ACTION B	3.7.1.3 Actions a and b	3
3.7.7 L.1	CTS 3.7.3.1.b for Unit 1 states that at least one CCW flow path in support of Unit 2 shutdown functions shall be available and CTS 3.7.3.1.b for Unit 2 states that at least one CCW flow path in support of Unit 1 shutdown functions shall be available. ITS 3.7.7 does not include these requirements. This changes the CTS by deleting these requirements from the CTS.	N/A	LCO 3.7.3.1.b, 3.7.3.1b Action, 4.7.3.1.d	1
3.7.7 L.2	CTS 4.7.3.1.b requires the verification that each automatic valve in the CCW System servicing safety related equipment actuates to its correct position. ITS SR 3.7.7.2 requires the same verification at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.7.2	4.7.3.1.b	10
3.7.7 L.3	CTS 4.7.3.1.b requires verification that CCW System automatic valves actuate to their correct position. ITS SR 3.7.7.2 requires verification that CCW System automatic valves in the flow path "that are not locked, sealed, or otherwise secured in position" actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by exempting valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.7.2	4.7.3.1.b	5
3.7.7 L.4	CTS 4.7.3.1.b requires verification of the automatic actuation of the Component Cooling Water System valves on a "test" signal. ITS SR 3.7.7.2 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.7.2	4.7.3.1.b	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.8 L.1	CTS 3.7.4.1.b for Unit 1 states that at least one ESW flowpath associated with support of Unit 2 shutdown functions shall be available and CTS 3.7.4.1.b for Unit 2 states that at least one ESW flowpath associated with support of Unit 1 shutdown functions shall be available. ITS 3.7.8 does not include these requirements. This changes the CTS by deleting these requirements from the CTS.	N/A	LCO 3.7.4.1.b, 3.7.4.1 Action b.2, 4.7.4.1.d	1
3.7.8 L.2	CTS 4.7.4.1.b requires the verification that each automatic valve in the ESW System servicing safety related equipment actuates to its correct position. ITS SR 3.7.8 2 requires the same verification at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.8.2	4.7.4.1.b	10
3.7.8 L.3	CTS 4.7.4.1.b requires verification that ESW System automatic valves actuate to their correct position. ITS SR 3.7.8.2 requires verification that ESW System automatic valves in the flow path "that are not locked, sealed, or otherwise secured in position" actuate to the correct position on an actual or simulated actuation signal. This changes the CTS by exempting valves that are locked, sealed, or otherwise secured in position from the verification.	SR 3.7.8.2	4.7.4.1.b	5
3.7.8 L.4	CTS 4.7.4.1.b requires verification of the automatic actuation of the Essential Service Water System valves on a "test" signal. ITS SR 3.7.8.2 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.7.8.2	4.7.4.1.b	6
3.7.10 L.1	Not used.			
3.7.10 L.2	CTS 4.7.5.1.e.2.a requires the verification that on a Safety Injection Signal from the associated unit, the system automatically operates in the pressurization/cleanup mode. CTS 4.7.5.1.e.2.b requires the verification that on a Safety Injection Signal from the other unit, the system automatically operates in the pressurization/cleanup mode. CTS 4.7.5.1.e.3 requires the verification that the system maintains the control room envelope/pressure boundary at a positive pressure of greater than or equal to 1/16 inch W.G. relative to the outside atmosphere at a system flow rate of 6000 cfm plus or minus 10%, with a makeup air flow rate ≤ 1000 cfm. These tests are required to be performed every 18 months. ITS SR 3.7.10.3 requires the verification that each CREV train actuates on an actual or simulated actuation signal. ITS SR 3.7.10.4 requires the verification that each CREV train can maintain a positive pressure of ≥ 0.0625 inches water gauge, relative to the outside atmosphere during the pressurization mode of operation at a makeup flow rate of ≤ 1000 cfm. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.10.3, SR 3.7.10.4	4.7.5.1.e.2.a, 4.7.5.1.e.2.b, 4.7.5.1.e.3	10

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.10 L.3	CTS 4.7.5.1.b requires the CREV trains be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the system operates for at least 15 minutes. ITS SR 3.7.10.1 requires the performance of a similar Surveillance, but at a Frequency of 46 days on a STAGGERED TEST BASIS. This changes the CTS by extending the Frequency of the Surveillances from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). A change to the STAGGERED TEST BASIS requirement is discussed in Discussion of Changes for ITS 1.0.	SR 3.7.10.1	4.7.5.1.b	9
3.7.11 L.1	CTS LCO 3.7.5.2 requires two heating and cooling systems of the CRAC System to be OPERABLE. ITS LCO 3.7.11 requires two CRAC trains to be OPERABLE. This changes the CTS by deleting the requirement to have two OPERABLE heating systems. The change that relocates the details of what constitutes an OPERABLE CRAC System (i.e., cooling systems) to the Bases is discussed in DOC LA.1.	LCO 3.7.11	LCO 3.7.5.1, 3.7.5.2 Action	1
3.7.11 L.2	The CTS 3.7.5.2 Action allows 7 days to restore an inoperable CRAC train to OPERABLE status. ITS 3.7.11 ACTION A allows 30 days to restore an inoperable CRAC train to OPERABLE status. This changes the CTS by increasing the time allowed to restore the inoperable components from 7 days to 30 days.	3.7.11 Required Action A.1	3.7.5.2 Action	3
3.7.12 L.1	Not used.			
3.7.12 L.2	CTS 4.7.6.1.d.3 requires verification that the standby fan starts automatically on a Containment Pressure--High-High Signal and directs its exhaust flow through the HEPA filters and charcoal adsorber banks on a Containment Pressure--High-High Signal. This Surveillance is required to be performed every 18 months. ITS SR 3.7.12.3 requires the verification that each ESF Ventilation train actuates on an actual or simulated actuation signal. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.12.3	4.7.6.1.d.3	10
3.7.12 L.3	CTS 4.7.6.1.a requires the ESF Ventilation System trains be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying the train operates for at least 15 minutes. ITS SR 3.7.12.1 requires the performance of a similar Surveillance, but at a Frequency of 46 days on a STAGGERED TEST BASIS. This changes the CTS by extending the Frequency of the Surveillances from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of 115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). A change to the STAGGERED TEST BASIS definition is discussed in the Discussion of Changes for ITS 1.0.	SR 3.7.12.1	4.7.6.1.a	9

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.13 L.1	CTS 3.9.12 states that the requirements on the FHAEV System are applicable "Whenever irradiated fuel is in the storage pool." CTS 3.9.12 Action a requires the suspension of all operations involving movement of fuel "within the storage pool" when the FHAEV System is inoperable. ITS 3.7.13 is applicable "During movement of irradiated fuel assemblies in the auxiliary building." ITS 3.7.13 ACTION A requires the suspension of movement of irradiated fuel assemblies "in the auxiliary building" when the required FHAEV train is inoperable or not in operation. This changes the CTS by restricting the Applicability of the FHAEV System Specification to only when there is a potential for a fuel handling accident (i.e., during movement of irradiated fuel assemblies in the auxiliary building).	3.7.13 Applicability, 3.7.13 Required Action A.1	3.9.12 Applicability, 3.9.12 Actions a and b	2
3.7.13 L.2	The CTS 3.9.12 Applicability covers the case when the crane is being used to move loads over the storage pool and CTS 3.9.12 Action a states to suspend crane operation with loads over the storage pool if no fuel storage pool exhaust ventilation system is OPERABLE. CTS 3.9.12 Action a footnote * also references crane operations with loads over the storage pool. ITS 3.7.13 does not include these requirements. This changes the CTS by deleting a portion of the Applicability and the associated Action concerning moving loads with the crane over the storage pool.	N/A	3.9.12 Applicability, 3.9.12 Action a (including footnote *)	2
3.7.13 L.3	CTS 3.9.12 Action a footnote * specifies that the crane bay roll-up door and the south door of the auxiliary building crane bay may be opened under administrative control during movement of fuel within the storage pool. ITS 3.7.13 includes this allowance in an LCO Note, which states that the auxiliary building boundary may be opened intermittently under administrative control. This changes the CTS by allowing the auxiliary building boundary to be opened for more reasons than is specified in the CTS.	3.7.13 LCO Note	3.9.12 Action a footnote *	1
3.7.13 L.4	CTS 4.9.12.d.3 requires, in part, the verification that on a high-radiation signal the system automatically shuts down the storage pool ventilation system supply fans. CTS 4.9.12.d.4 requires the verification that the required FHAEV System maintains the fuel handling area at a negative pressure of ≥ 1/8 inches water gauge relative to the outside atmosphere during system operation. These tests are required to be performed every 18 months. ITS SR 3.7.13.4 requires the verification that the required FHAEV train actuates on an actual or simulated actuation signal. ITS SR 3.7.13.5 requires the verification that the required FHAEV train can maintain a pressure of ≥ 0.125 inches of vacuum water gauge with respect to atmospheric pressure during the accident mode of operation at a flow rate of ≤ 27,000 cfm. These tests are required to be performed every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2). Other changes to CTS 4.9.12.d.3 are discussed in DOCs M.1 and LA.1 while other changes to CTS 4.9.12.d.4 are discussed in DOCs A.4 and M.2.	SR 3.7.13.4, SR 3.7.13.5	4.9.12.d.3, 4.9.12.d.4	10

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3.7.13 L.5	CTS 4.9.12.a states that the required FHAEV System shall be demonstrated OPERABLE at least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for a least 15 minutes. ITS SR 3.7.13.2 requires the performance of a similar Surveillance, but at a Frequency of 92 days. This changes the CTS by extending the Frequency of the Surveillances from 31 days (i.e., a maximum of 38.75 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 92 days (i.e., a maximum of115 days accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.7.13.2	4.9.12.a	9
3.7.14 L.1	CTS 3.9.11 states that the requirements on storage pool water level are applicable "Whenever irradiated fuel assemblies are in the storage pool." CTS 4.9.11 requires the water level in the storage pool to be verified every 7 days when irradiated fuel assemblies are in the storage pool. ITS 3.7.14 is applicable "During movement of irradiated fuel assemblies in the fuel storage pool." ITS SR 3.7.14.1 requires verification of the spent fuel pool water level every 7 days. This changes the CTS by restricting the Applicability of the spent fuel pool water level Specification and performance of the Surveillance to only when there is a potential for a fuel handling accident, i.e., during the movement of irradiated fuel assemblies in the fuel storage pool. In addition, since the Applicability is now limited to when irradiated fuel is being moved, the CTS Action to restore water level to within its limit within 4 hours after movement of fuel has been suspended has also been deleted	3.7.14 Applicability	3.9.11 Applicability, 3.9.11 Action, 4.9.11	2
3.7.14 L.2	CTS 3.9.11 Action states that when the spent fuel pool water level is not met, suspend all movement of fuel assemblies and crane operations with loads in the fuel storage areas. ITS 3.7.14 Required Action A.1 states that when fuel storage pool water level is not within limit, immediately suspend movement of irradiated fuel assemblies in the fuel storage pool. This changes the CTS by deleting the requirement to suspend crane operation over the spent fuel storage areas.	3.7.14 Required Action A.1	3.9.11 Action	4
3.7.15 L.1	CTS 3.9.15 is applicable at all times. ITS 3.7.15 is applicable when fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool. In addition, ITS 3.7.15 Required Action A.2.2 provides an alternative action to allow exiting the MODE of Applicability in the event the LCO is not met. This changes the CTS by reducing the Applicability of the Fuel Storage Pool Boron Concentration Specification to only the time when fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool, and adding an ACTION that allows exiting the Applicability if the LCO is not met.	3.7.15 Applicability, 3.7.15 Required Action A.2.2	3.9.15 Applicability	2
3.7.17 L.1	CTS Table 4.7-2 Item 1 requires that the gross activity determination be completed 3 times per 7 days with a maximum time of 72 hours between samples (Unit 1) or once per 72 hours (Unit 2). ITS 3.7.17 does not require any sampling to be performed to determine the gross activity of the secondary coolant. This changes the CTS by deleting the requirement for gross activity determination.	N/A	Table 4.7-2 Item 1	5

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3.8.1 L.1	CTS 3.8.1.1 Action a specifies the compensatory actions for one inoperable offsite source. The action requires restoration of the two offsite circuits and two DGs to OPERABLE status within 72 hours. CTS 3.8.1.1 Action b specifies the compensatory actions for one inoperable DG. The action requires restoration of the DGs to OPERABLE status within 72 hours. CTS 3.8.1.1 Action c specifies the compensatory actions for one inoperable offsite circuit and one inoperable DG. The action requires restoration of at least one of these sources within 12 hours, and if the DG is restored to OPERABLE status to follow Action a and if the offsite circuit is restored to OPERABLE status to follow Action b. CTS 3.8.1.1 Action c also includes a footnote * that states that the Action time shall be based upon the time associated with the component inoperability, and is not reset when exiting this Action statement. CTS 3.8.1.1 Action d specifies the compensatory actions for two inoperable offsite circuits. The action requires restoration of at least one of these sources within 24 hours, and with only one offsite circuit restored to OPERABLE status to follow Action a. CTS 3.8.1.1 Action d also includes the same footnote mentioned above. CTS 3.8.1.1 Action e specifies the compensatory actions for two inoperable DGs. The action requires restoration of at least one of these sources within 2 hours, and with one DG restored to OPERABLE status to follow Action b or c. CTS 3.8.1.1 Action e also includes the same footnote mentioned above. ITS 3.8.1 Required Actions A.3, B.4, D.1 and D.2, C.2, and E.1, respectively include the same Completion Times as in the CTS. However, ITS 3.8.1 Required Actions A.3 (for an inoperable offsite circuit) and B.4 (for an inoperable DG) both include an additional requirement that restoration is required within 6 days from discovery of failure to meet LCO 3.8.1.a or b. This changes the CTS by extending the Completion Times for multiple concurrent AC Source inoperabilities from 72 hours to 6 days.	3.8.1 Required Actions A.3 and B.4	3.8.1.1 Actions c, d, and e footnote *	3
3.8.1 L.2	CTS 4.8.1.1.2.a requires that each DG be demonstrated OPERABLE in accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS. CTS Table 4.8-1 specifies the test frequency based on the number of failures that have occurred in testing each DG during the previous 20 tests. If the number of failures do not exceed the specified limit, testing is to be performed every 31 days on a STAGGERED TEST BASIS. If failures occur above the specified limits, then testing is conducted every 7 days on a STAGGERED TEST BASIS. In addition, CTS 3.8.1.1 Action b which covers inoperabilities associated with a DG includes a cross reference to the Table that states "At the number of failures for the inoperable diesel indicated in Table 4.8-1 perform the Additional Reliability Actions prescribed in Table 4.8-1." ITS 3.8.1 does not include the requirements to test at an accelerated testing Frequency based on DG failures. ITS SR 3.8.1.2 requires each DG to be started at a fixed frequency of 31 days. ITS SR 3.8.1.3 requires each DG be synchronized and loaded and operated for ≥ 60 minutes at a fixed frequency of 31 days. This changes the CTS by eliminating the requirement to test the DGs at an increased frequency based on the number of test failures. The change to the STAGGERED TEST BASIS requirements is discussed in DOC L.4 and the changes to the test frequency of CTS 4.8.1.1.2.a.1 and 3 are discussed in DOCs L.5 and L.19, respectively.	SR 3.8.1.2, SR 3.8.1.3	3.8.1.1 Action b, 4.8.1.1.2.a, 4.8.1.1.2.a.4, 4.8.1.1.2.a.5, Table 4.8-1	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L.3	CTS 4.8.1.1.1.b requires a demonstration that the offsite circuits are OPERABLE by transferring the unit power source automatically from the normal auxiliary source to the preferred reserve source and by transferring manually to the alternate reserve source. CTS 4.8.1.1.2.e.2 requires a verification that the DG is capable of rejecting a load ≥ 600 kW. CTS 4.8.1.1.2.e.3 requires a verification that the DG is capable of rejecting a load of 3500 kW. CTS 4.8.1.1.2.e.4 requires a verification of the DG performance during a simulated loss of offsite power. CTS 4.8.1.1.2.e.5 requires a verification of the DG performance during a simulated Safety Injection actuation. CTS 4.8.1.1.2.e.6 requires a verification of the DG performance during a simulated Safety Injection actuation test signal with a loss of offsite power. CTS 4.8.1.1.2.e.7 requires a verification of the DG performance during an 8 hour run at the continuous load rating. CTS 4.8.1.1.2.e.9 requires a verification of the DG performance during a simulated restoration of offsite power. CTS 4.8.1.1.2.e.10 requires verifying that with the DG operating in a test mode while connected to its test load, a simulated Safety Injection signal overrides the test mode by returning the DG to standby operation and ensuring the emergency loads remain powered by offsite power. CTS 4.8.1.1.2.e.11 requires a verification of the automatic sequence timing relays. These Surveillances are performed on an 18 month Frequency. ITS SR 3.8.1.9 through SR 3.8.1.20 require the same testing (as modified by specific DOCs) at a 24 month Frequency. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.8.1.9 through SR 3.8.1.20	4.8.1.1.1.b, 4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.9, 4.8.1.1.2.e.11	10
3.8.1 L.4	CTS 4.8.1.1.2.a states that each DG shall be demonstrate OPERABLE in accordance with the frequency specified in Table 4.8-1 "on a STAGGERED TEST BASIS." The Surveillance Frequency for ITS SR 3.8.1.2, SR 3.8.1.3, and SR 3.8.1.4 is every 31 days, but does not include the "STAGGERED TEST BASIS" requirement. The ITS SR 3.8.1.7 Surveillance Frequency is every 92 days as discussed in DOC L.19, and also does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS.	SR 3.8.1.2, SR 3.8.1.3, SR 3.8.1.4, SR 3.8.1.7	4.8.1.1.2.a, 4.8.1.1.2.a.1, 4.8.1.1.2.a.3, 4.8.1.1.2.a.4, 4.8.1.1.2.a.5	7
3.8.1 L.5	CTS 4.8.1.1.2.a.1 requires the verification of the fuel level in the day tank. The test Frequency for this Surveillance is in accordance with the frequency specified in Table 4.8-1 (the DG Test Schedule Table) on a STAGGERED TEST BASIS. ITS SR 3.8.1.4 requires verification that each day tank contains the required volume of fuel oil every 31 days. This changes the CTS by deleting the requirement to perform this Surveillance in accordance with the DG Test Schedule Table. The change to the STAGGERED TEST BASIS requirement is discussed in DOC L.4.	SR 3.8.1.4	4.8.1.1.2.a, 4.8.1.1.2.a.1, Table 4.8-1	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L.6	CTS 4.8.1.1.2.a.5 specifies that the DG must be loaded to 3500 kW during the 60 minute run test. CTS 4.8.1.1.2.e.3 specifies that the load rejection test must be performed by rejecting a load of 3500 kW. CTS 4.8.1.1.2.e.7 requires the diesel to be loaded to 3500 kW during the 8 hour run test. CTS 4.8.1.1.2.e.7 states that within 5 minutes after completing this 8 hour test to perform CTS 4.8.1.1.2.a.4, and footnote ** states that if CTS 4.8.1.1.2.a.4 is not satisfactorily completed, then it is not necessary to repeat the preceding 8 hour test. Instead, the DG may be operated at 3500 kW for 2 hours or until operating temperatures has stabilized. ITS SR 3.8.1.3, the 60 minute run test, specifies that each DG must be loaded to ≥ 3150 kW and ≤ 3500 kW. ITS SR 3.8.1.11, the full load rejection test, specifies the load rejection range for the test to be ≥ 3150 kW and ≤ 3500 kW. ITS SR 3.8.1.15, the 8 hour endurance run, specifies the load range to be ≥ 3150 kW and ≤ 3500 kW. ITS SR 3.8.1.16, the hot restart test, is modified by Note 1, which includes the details of CTS 4.8.1.1.2.e.7 footnote **, however the load has also been changed to ≥ 3150 kW and ≤ 3500 kW. This changes the CTS by allowing the DGs to be tested at a lower load during these Surveillances.	SR 3.8.1.3, SR 3.8.1.11, SR 3.8.1.15, SR 3.8.1.16 Note 1	4.8.1.1.2.a.5, 4.8.1.1.2.e.3 4.8.1.1.2.e.7 (including footnote **)	6
3.8.1 L.7	CTS 4.8.1.1.2.b.1) requires the removal of accumulated water from the day tank at least once per 31 days and "after each occasion when the diesel is operated for greater than 1 hour." ITS SR 3.8.1.5, which requires the same Surveillance to be performed once per 31 days, does not include the conditional Frequency. This changes the CTS by deleting the requirement to test for accumulated water after each occasion when the DG is operated for greater than 1 hour.	SR 3.8.1.5	4.8.1.1.2.b.1)	7
3.8.1 L.8	CTS 4.8.1.1.2.e contains a requirement to perform various test "during shutdown." These tests have been incorporated in ITS SR 3.8.1.10 through SR 3.8.1.15 and SR 3.8.1.17 through SR 3.8.1.20. ITS SR 3.8.1.10, SR 3.8.1.11, and SR 3.8.1.13 through SR 3.8.1.15 include a Note which state that the Surveillance shall not normally be performed in MODE 1 or 2. ITS SR 3.8.1.12 and SR 3.8.1.17 through SR 3.8.1.20 include a Note which state that the Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. The Notes also state that the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. This changes the CTS by deleting the requirement to perform the Surveillances during shutdown, and replacing the shutdown requirement with a Note stating when the Surveillances are not normally performed but allowing the test to be performed in these MODES as long as the associated assessment is performed.	SR 3.8.1.10 Note 1, SR 3.8.1.11 Note 1, SR 3.8.1.12 Note 2, SR 3.8.1.13 Note 2, SR 3.8.1.14 Note , SR 3.8.1.15 Note 2, SR 3.8.1.17 Note, SR 3.8.1.18 Note, SR 3.8.1.19 Note 2, SR 3.8.1.20 Note 2	4.8.1.1.2.e, 4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.9, 4.8.1.1.2.e.10 4.8.1.1.2.e.11	12

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L.9	CTS 4.8.1.1.2.e.2 requires a verification that the DG is capable of rejecting a load ≥ 600 kW while maintaining a voltage of 4160 ± 420 V and frequency of 60 ± 1.2 Hz. ITS SR 3.8.1.10 requires verification that each DG rejects a load greater than or equal to its associated single largest post-accident load and following load rejection, frequency is ≤ 64.4 Hz, and after 2 seconds steady state voltage is ≥ 3910 V and ≤ 4400 V and frequency is ≥ 59.4 Hz and ≤ 61.2 Hz. This changes the CTS by allowing the transient frequency to exceed the limit for the first 2 seconds and deleting the voltage limits during the first 2 seconds of the transient. Other changes to the minimum frequency limit and the minimum and maximum voltage limits are discussed in DOC M.5.	SR 3.8.1.10	4.8.1.1.2.e.2	6
3.8.1 L.10	CTS 4.8.1.1.2.e.3 requires a verification that the DG is capable of rejecting a load of 3500 kW without exceeding 75% of the difference between nominal speed and the overspeed trip setpoint. ITS SR 3.8.1.11 requires verification that each DG does not trip and voltage is maintained ≤ 5000 V during and following a load rejection of ≥ 3150 kW and ≤ 3500 kW. This changes the CTS by changing the DG full load rejection speed limitation acceptance criteria. The change to the load range is discussed in DOC L.6 and the addition of the voltage limit is discussed in DOC M.1	SR 3.8.1.11	4.8.1.1.2.e.3	6
3.8.1 L.11	CTS 4.8.1.1.2.e.4 requires verification of DG performance following a "simulated" loss of offsite power. CTS 4.8.1.1.2.e.5 requires verification of DG performance following a Safety Injection actuation "test" signal. CTS 4.8.1.1.2.e.6 requires verification of DG performance following a "simulated" loss of offsite power in conjunction with a Safety Injection actuation "test" signal. CTS 4.8.1.1.2.e.10 requires verifying with the DG operating in a test mode while connect to its test load, a “simulated” Safety Injection signal overrides the test mode by returning the DG to standby operation and ensuring the emergency loads remain powered by offsite power. ITS SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.19, and SR 3.8.1.20 specify that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.19, SR 3.8.1.20	4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.10	6
3.8.1 L.12	CTS 4.8.1.1.2.e.7 requires verification that the DG operates at a power factor of less than or equal to 0.86 for at least 8 hours. ITS SR 3.8.1.15 requires verification that each DG operates at a power factor of ≤ 0.86 for ≥ 8 hours, but a Note (ITS SR 3.8.1.15 Note 3) has been added which allows the power factor to be outside of the limit under certain conditions. The Note states that if performed with DG synchronized with offsite power, it shall be performed at a power factor ≤ 0.86. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable. This changes the CTS by allowing the 8 hours endurance run to be performed at a power factor outside of the CTS limit.	SR 3.8.1.15 Note 3	4.8.1.1.2.e.7	6
3.8.1 L.13	CTS 4.8.1.1.2.e.8 requires verification that the auto-connected loads to each DG do not exceed 3500 kW. ITS 3.8.1 does not require the verification of this loading limit to ensure OPERABILITY of the DGs. This changes the CTS by deleting the Surveillance Requirement.	N/A	4.8.1.1.2.e.8	5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L.14	CTS 4.8.1.1.2.f.3) contains a requirement to start both .DGs simultaneously "during shutdown." ITS SR 3.8.1.22 removes the MODE restrictions for performing the required test. This changes the CTS by deleting the requirement to perform the Surveillance during shutdown.	SR 3.8.1.22	4.8.1.1.2.f.3)	12
3.8.1 L.15	CTS 4.8.1.1.2.f.3) contains a requirement to start both DGs simultaneously and verifying that both DGs accelerate to at least 514 RPM in less than or equal to 10 seconds. ITS SR 3.8.1.22 requires verification when the DGs are started simultaneously that each DG achieves a frequency of greater than or equal to 58.8 Hz. This changes the CTS by decreasing the speed (i.e., frequency) requirement from 514 RPM (60 Hz) to 58.8 Hz.	SR 3.8.1.22	4.8.1.1.2.f.3)	6
3.8.1 L.16	CTS 4.8.1.1.2.f.3) footnote * specifies that CTS 4.8.1.1.2.f.3) must be performed following any modification that could affect DG interdependence. ITS 3.8.1 does not include this testing requirement. This changes the CTS by deleting this testing requirement.	N/A	4.8.1.1.2.f.3) footnote*	5
3.8.1 L.17	CTS 3.0.5 allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source provided its corresponding normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. CTS 3.0.5 requires a unit shutdown to start within two hours with these requirements not met. CTS 3.0.5 also provides an explicit time period to be in HOT STANDBY (MODE 3), HOT SHUTDOWN (MODE 4), and COLD SHUTDOWN (MODE 5). ITS 3.8.1 ACTION A (one required offsite source inoperable) requires the declaration of required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the Required Action A.2 is 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). ITS 3.8.1 ACTION B (one required DG inoperable) requires the declaration of required feature(s) supported by the inoperable DG inoperable when its required redundant feature(s) is inoperable. The Completion Time allowed by the Required Action B.2 is 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s). ITS 3.8.1 ACTION C (two required offsite circuits inoperable) requires the declaration of required feature(s) inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the Required Action C.1 is 12 hours from discovery of Condition C concurrent with inoperability of redundant required features. This changes the CTS by allowing more time to restore inoperable equipment and replaces the explicit times to be in MODE 3, MODE 4, and MODE 5 with a requirement to declare the affected features inoperable (and thus to take the ACTIONS required by the individual system LCO, including possible shutdown of the unit).	3.8.1 Required Actions A.2, B.2, and C.1	3.0.5	3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.1 L.18	CTS 4.8.1.1.2.a.4, the normal DG start test, and CTS 4.8.1.1.2.e.7, the DG hot restart test, each require a verification that the DG starts from standby conditions and achieves in less than or equal to 10 seconds, a voltage of 4160 ± 420 V and a frequency of 60 ± 1.2 Hz. ITS SR 3.8.1.8, the 184 day quick start test, and SR 3.8.1.16, the 24 month hot restart test, require the verification that each DG starts from standby conditions and achieves a voltage of ≥ 3740 V and frequency ≥ 58.8 Hz within 10 seconds and a steady state voltage of ≥ 3910 V and ≤ 4400 V and a steady state frequency of ≥ 59.4 Hz and ≤ 61.2 Hz. This changes the CTS by specifying a minimum voltage and frequency to be achieved within 10 seconds instead of requiring the voltage and frequency to be within range in 10 seconds. This effectively allows the upper steady state limits to be exceeded during DG acceleration and stabilization. The change to the actual frequency and voltage values is discussed in DOC M.5.	SR 3.8.1.8, SR 3.8.1.16	4.8.1.1.2.a.4, 4.8.1.1.2.e.7	6
3.8.1 L.19	CTS 4.8.1.1.2.a.3 requires that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank. The test Frequency for these Surveillance is in accordance with the frequency specified in Table 4.8-1 (the DG Test Schedule Table) on a STAGGERED TEST BASIS. The nominal test Frequency in CTS Table 4.8-1 is 31 days. ITS SR 3.8.1.7 requires the verification that the fuel oil transfer system operates to automatically transfer fuel oil from the storage tank to the day tank every 92 days. This changes the CTS by deleting the requirement to perform this Surveillance in accordance with the DG Test Schedule Table, and changes the nominal test Frequency to 92 days. The change to the STAGGERED TEST BASIS requirement is discussed in DOC L.4.	SR 3.8.1.7	4.8.1.1.2.a, 4.8.1.1.2.a.3, Table 4.8-1	7
3.8.1 L.20	Not used.			
3.8.1 L.21	CTS 3.8.1.1 Action b specifies the compensatory actions for one inoperable DG and CTS 3.8.1.1 Action c specifies the compensatory actions for one inoperable offsite circuit and one inoperable DG. The Actions include a requirement to demonstrate the OPERABILITY of the remaining OPERABLE DG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless the absence of any potential common mode failure for the remaining DG is demonstrated. ITS 3.8.1 Required Actions B.3.1 and B.3.2 allows 24 hours to perform similar checks on the remaining OPERABLE DGs. This changes the CTS by extending the time to perform these checks from 8 hours to 24 hours.	3.8.1 Required Actions B.3.1 and B.3.2	3.8.1.1 Actions b and c	N/A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L.1	The CTS 3.8.1.2 Action specifies the compensatory action for an inoperable required AC Source. One of the compensatory actions is the suspension of positive reactivity "changes except: 1) heatup or cooldown of the reactor coolant volume provided that SHUTDOWN MARGIN sufficient to accommodate the change in temperature is maintained in accordance with Specification 3.1.1.2 in MODE 5 or Specification 3.9.1 in MODE 6, and the heatup or cooldown rate is restricted to 50°F or less in any one-hour period in MODE 5, or 2) addition of water from the RWST, provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2." ITS 3.8.2 Required Action A.2.3 (for an inoperable required offsite circuit) or Required Action B.3 (for an inoperable required DG) require the immediate suspension of operations involving positive reactivity "additions that could result in loss of required SDM or boron concentration." This changes the CTS compensatory actions by deleting the limitation on the heatup and cooldown rates of 50ºF or less in any one hour period in MODE 5 and allows the addition of water from any source including the RWST as long as SDM and boron concentration limitations are met.	3.8.2 Required Actions A.2.3 and B.3	3.8.1.2 Action	4
3.8.2 L.2	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of CTS 4.8.1.1.1 and CTS 4.8.1.1.2 except for requirement CTS 4.8.1.1.2.a.5. ITS SR 3.8.2.1 has included this allowance in the Note to SR 3.8.2.1 (it exempts performance of ITS SR 3.8.1.3), however additional SRs are excepted from being performed. ITS SR 3.8.2.1 states that the following SRs are also not required to be performed: SR 3.8.1.10 through SR 3.8.1.12, SR 3.8.1.15 through SR 3.8.1.17, and SR 3.8.1.18. This changes the CTS by not requiring the performance of additional AC Source Surveillances.	SR 3.8.2.1 Note	4.8.1.2	7
3.8.2 L.3	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5. ITS SR 3.8.2.1 has included this allowance in the Note to SR 3.8.2.1 (see DOC L.2). However, additional ITS SRs are excepted from being required to be met. ITS SR 3.8.2.1 states, in part, that the following SRs are not required to be met: SR 3.8.1.9 and SR 3.8.1.22. This changes the CTS by not requiring certain Surveillances to be met. Further changes to CTS 3.8.1.2 are discussed in DOC L.6.	SR 3.8.2.1	4.8.1.2	6
3.8.2 L.4	The CTS 3.8.1.2 Action requires the suspension of certain activities when the required AC Source is inoperable. ITS 3.8.2 provides an alternate Required Action (ITS 3.8.2 Required Action A.1) that allows the declaration of affected required feature(s) with no offsite power available inoperable instead of requiring the specified activities to be suspended. This changes the CTS by allowing the affected required feature(s) with no offsite power available to be declared inoperable instead of suspending the specified activities.	3.8.2 Required Action A.1	3.8.1.2 Action	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L.5	Unit 2 CTS 3.8.1.2.a requires one circuit between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE and Unit 2 CTS 3.8.1.2.b requires one DG to be OPERABLE. These two required AC Sources are Unit 2 sources. Unit 2 CTS 3.9.12 requires the Fuel Handling Area Exhaust Ventilation (FHAEV) System (which is powered from Unit 1 AC Sources) to be OPERABLE whenever irradiated fuel is in the storage pool. The Unit 2 CTS definition of "OPERABLE - OPERABILITY" includes both a normal and emergency electrical power source requirement. However, there are no specific requirements in Unit 2 CTS 3.8.1.2 requiring the Unit 1 AC Sources to be OPERABLE to support the FHAEV System. In addition, CTS 3.0.5, which provides compensatory actions when an AC Source is inoperable, is not applicable in MODES 5 and 6. Unit 2 ITS LCO 3.8.1.2.c requires one Unit 1 qualified circuit between the offsite transmission network and the Unit 1 onsite Class 1E AC electrical power distribution subsystem required by LCO 3.8.10. This changes the Unit 2 CTS by explicitly requiring only one Unit 1 AC Source (the offsite source) associated with the Unit 1 equipment required to be OPERABLE to support Unit 2 operation.	Unit 2 LCO 3.8.2.c	N/A	1
3.8.2 L.6	CTS 4.8.1.2 requires the AC electrical power sources to be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.5. ITS SR 3.8.2.1 has included this allowance in the Note to SR 3.8.2.1 (see DOC L.2). However, additional ITS SRs are excepted from being required to be met. ITS SR 3.8.2.1 states, in part, that the following SRs are not required to be met: SR 3.8.1.13, SR 3.8.1.14 (ESF actuation signal portion only) and SR 3.8.1.19, SR 3.8.1.20, and SR 3.8.1.21. This changes the CTS by not requiring certain Surveillances to be met. Further changes to CTS 3.8.1.2 are discussed in DOC L.3.	SR 3.8.2.1	4.8.1.2	N/A
3.8.3 L.1	The CTS 3.8.1.1 and 3.8.1.2 Actions do not provide explicit compensatory actions if the volume of fuel oil in the storage tank is less than the specified limit. Thus, if the minimum indicated volume is not met, the associated DG must be declared inoperable and CTS 3.8.1.1 Action b or the CTS 3.8.1.2 Action must be entered, as applicable. ITS 3.8.3 ACTION A allows the unit to not declare the associated DG inoperable as long as the volume of stored fuel oil is greater than a six day limit (i.e., > 39,500 gallons). In this situation, ITS 3.8.3 Required Action A.1 allows 48 hours to restore the fuel oil volume to within limits. If this Required Action and associated Completion Time is not met or if the DG fuel oil storage tank volume is ≤ to 39,500 gallons, the associated DG must be declared inoperable immediately (ITS 3.8.3 ACTION D). In addition, a Note has been added to the ITS 3.8.3 ACTIONS that allows separate Condition entry for each DG. This changes the CTS by allowing each DG not to be declared inoperable with the fuel oil storage tank volume not within the specified Surveillance limit as long as each DG has enough fuel oil for 6 days (> 39,500 gallons) of operation at full load.	3.8.3 ACTION A	3.8.1.1 Action b, 3.8.1.2 Action	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.3 L.2	CTS 4.8.1.1.2.a specifies that each DG shall be demonstrated OPERABLE in accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS. CTS Table 4.8-1 specifies the test frequency based on the number of failures that have occurred in testing each DG during the previous 20 tests. If the number of failures do not exceed the specified limit, testing is to be performed every 31 days. If failure occurs above the specified limit, then testing is conducted every 7 days. CTS 4.8.1.1.2.a.2 requires the verification of the fuel level in the fuel storage tank. ITS SR 3.8.3.1 requires the verification that each fuel oil storage tank contains the specified volume limit every 31 days. This changes the CTS by deleting the requirement to verify the fuel oil storage tank level at an increasing frequency based on the number of DG failures. The deletion of the STAGGERED TEST BASIS requirement is discussed in DOC L.3.	SR 3.8.3.1	4.8.1.1.2.a, 4.8.1.1.2.a.2, Table 4.8-1	7
3.8.3 L.3	CTS 4.8.1.1.2.a states that each DG shall be demonstrate OPERABLE in accordance with the frequency specified in Table 4.8-1 "on a STAGGERED TEST BASIS." CTS 4.8.1.1.2.a.2 requires the verification of the fuel level in the fuel storage tank. ITS SR 3.8.3.1 requires the verification that each fuel oil storage tank contains the specified volume limit every 31 days. The Surveillance Frequency for ITS SR 3.8.3.1 is every 31 days, but does not include the "STAGGERED TEST BASIS" requirement. This changes the CTS by deleting the requirement to test on a STAGGERED TEST BASIS. The deletion to monitor the fuel oil storage tank volume more frequently based on the number of DG failures is discussed in DOC L.2.	SR 3.8.3.1	4.8.1.1.2.a, 4.8.1.1.2.a.2	7
3.8.4 L.1	CTS 3.8.2.3 Action b states that with one Train A or Train B 250 VDC battery and/or its charger inoperable, to restore the inoperable battery and/or charger to OPERABLE status within 2 hours. ITS 3.8.4 ACTION A has been added which covers the condition for one required Train A or Train B battery charger inoperable. ITS 3.8.4 Required Action A.1 requires the restoration of the battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours. ITS 3.8.4 Required Action A.2 requires the verification that the battery float current is ≤ 2 amps once per 12 hours and ITS 3.8.4 Required Action A.3 requires the restoration of the battery charger to OPERABLE status within 7 days. This changes the CTS by extending the time a required battery charger may be inoperable.	3.8.4 ACTION A	3.8.2.3 Action b	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L.2	CTS 4.8.2.3.2.c.3 requires the verification that the required Train A and Train B battery chargers will supply at least 300 amperes at greater than or equal to 250 VDC for at least 4 hours. CTS 4.8.2.3.2.d requires the performance of a battery service test on the Train A and Train B batteries by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status the actual or simulated emergency loads for the design duty cycle. CTS 4.8.2.5.2.c.3 requires the verification that the Train N battery charger will supply at least 25 amperes at greater than or equal to 250 VDC for at least 4 hours. CTS 4.8.2.5.2.d requires the performance of a battery service test on the Train N battery by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status the actual or simulated emergency loads for the design duty cycle. The Frequency of performance of these Surveillances is every 18 months. ITS SR 3.8.4.2 requires the verification that each required Train A and Train B battery charger supplies ≥ 300 amps and the required Train N battery charger supplies ≥ 25 amps at ≥ 250 VDC for ≥ 4 hours. ITS SR 3.8.4.3 requires the verification that the battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. The Frequency of testing of ITS SR 3.8.4.2 and ITS SR 3.8.4.3 is once every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.8.4.2, SR 3.8.4.3	4.8.2.3.2.c.3, 4.8.2.3.2.d, 4.8.2.5.2.c.3, 4.8.2.5.2.d	10
3.8.4 L.3	CTS 4.8.2.3.2.c.1, for the Train A and Train B batteries, and CTS 4.8.2.5.2.c.1, for the Train N battery, require the verification that the cells, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance. CTS 4.8.2.3.2.c.2, for the Train A and Train B batteries, and CTS 4.8.2.5.2.c.2, for the Train N battery, require the removal of visible corrosion and verifying that the cell-to-cell and terminal connections are clean, tight, and coated with anti-corrosion material. ITS 3.8.4 does not include these requirements for battery inspections, the removal of visible corrosion, and the verification that the cell-to-cell and terminal connections are clean, tight, and coated with anti-corrosion material. This changes the CTS by deleting the explicit battery requirements from the Technical Specifications.	N/A	4.8.2.3.2.c.1, 4.8.2.3.2.c.2, 4.8.2.5.2.c.1, 4.8.2.5.2.c.2	5

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.4 L.4	CTS 4.8.2.3.2.d requires the performance of a battery service test on the Train A and Train B batteries. CTS 4.8.2.5.2.d requires the performance of a battery service test on the Train N battery. These tests must be performed during shutdown (MODES 5 or 6). ITS SR 3.8.4.3 requires the verification that the battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. Note 2 to ITS SR 3.8.4.3 specifies that this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. This changes the CTS by allowing the test to be performed in MODES other than MODE 5 or 6 as long as an assessment determines the safety of the unit is maintained or enhanced.	SR 3.8.4.3 Note 2	4.8.2.3.2.d, 4.8.2.5.2.d	12
3.8.4 L.5	CTS 4.8.2.3.2.a.4 requires the Train A and Train B 250 VDC batteries to have an overall voltage of greater than or equal to 250 VDC. CTS 4.8.2.5.2.a.4 requires the Train N 250 VDC battery overall voltage to be greater than or equal is 250 VDC. ITS SR 3.8.4.1 requires the verification that the battery terminal voltage is greater than or equal to the minimum established float voltage. This changes the CTS by deleting the actual value for the minimum overall battery voltage.	SR 3.8.4.1	4.8.2.3.2.a.4, 4.8.2.5.2.a.4	6
3.8.5 L.1	CTS 3.8.2.4 Action a specifies the compensatory action for an inoperable required DC Source. One of the compensatory actions is the suspension of positive reactivity "changes except: 1) heatup or cooldown of the reactor coolant volume provided that SHUTDOWN MARGIN sufficient to accommodate the change in temperature is maintained in accordance with Specification 3.1.1.2 in MODE 5 or Specification 3.9.1 in MODE 6, and the heatup or cooldown rate is restricted to 50°F or less in any one-hour period in MODE 5, or 2) addition of water from the RWST, provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2." ITS 3.8.5 Required Action A.3 requires the immediate suspension of operations involving positive reactivity "additions that could result in loss of required SDM or boron concentration." This changes the CTS compensatory actions by deleting the limitation on the heatup and cooldown rates of 50ºF or less in any one hour period in MODE 5 and allows the addition of water from any source including the RWST as long as SDM and boron concentration limitations are met.	3.8.5 Required Action A.3	3.8.2.4 Action a	4
3.8.5 L.2	CTS 4.8.2.4.2 requires the demonstration of the OPERABILITY of the 250 VDC battery and charger in accordance with the Surveillance Requirements of CTS 4.8.2.3.2. ITS SR 3.8.5.1 requires SR 3.8.4.1, SR 3.8.4.2, and SR 3.8.4.3 to be applicable. However, a Note has been added that states ITS SR 3.8.4.3 does not have to be performed. This changes the CTS by allowing a certain SR not to be performed. Changes to the Surveillances of CTS 4.8.2.3.2 are discussed in the Discussion of Changes for ITS 3.8.4, "DC Sources - Operating."	SR 3.8.5.1 Note	4.8.2.4.2	7

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L.1	CTS 3.8.2.3 Action b specifies the compensatory actions for inoperable batteries associated with the Trains A and B 250 VDC electrical power subsystem during MODES 1, 2, 3, and 4. The compensatory action requires restoration within 2 hours before commencing a reactor shutdown. CTS 3.8.2.4 Actions a and b specify the compensatory actions for inoperable batteries associated with the Trains A and B 250 VDC electrical power subsystem during MODES 5 and 6, and (for Unit 1 only) during movement of irradiated fuel. The compensatory actions require immediate actions to suspend certain activities and to commence actions to restore the inoperable equipment to OPERABLE status. CTS 3.8.2.5 Action specifies the compensatory actions for the battery associated with the Train N 250 VDC electrical power subsystem during MODES 1, 2, and 3. The compensatory action is to immediately declare the associated equipment inoperable and take the appropriate actions for an inoperable turbine driven auxiliary feedwater train. In lieu of immediately declaring the associated battery inoperable, the ITS 3.8.6 ACTIONS provide compensatory actions for when battery parameters are not within limits that may be taken prior to declaring the associated battery inoperable. This changes the CTS by adding compensatory actions specifically designed for battery parameters.	3.8.6 ACTIONS A, B, C, D, E, and F	3.8.2.3 Action b, 3.8.2.4 Actions a and b, 3.8.2.5 Action	4
3.8.6 L.2	CTS 4.8.2.3.2.a.3 and CTS 4.8.2.5.2.a.3 require the verification that the pilot cell voltage is greater than or equal to the specified limit every 7 days. ITS SR 3.8.6.2 requires the verification of each pilot battery cell voltage every 31 days. This changes the CTS by extending the Surveillance interval for verification of pilot cell voltage from 7 days to 31 days.	SR 3.8.6.2	4.8.2.3.2.a.3, 4.8.2.5.2.a.3	7
3.8.6 L.3	CTS 4.8.2.3.2.a.1 and CTS 4.8.2.5.2.a.1 require the verification that the electrolyte level of each pilot cell is between the minimum and maximum level indication marks. CTS 4.8.2.3.2.a.2 and CTS 4.8.2.5.2.a.2 require the verification that the pilot cell specific gravity, corrected to 77°F and full electrolyte level (fluid at the bottom of the maximum level indication mark), is greater than or equal to 1.200. CTS 4.8.2.3.2.b.2 and CTS 4.8.2.5.2.b.2 require the verification that the specific gravity, corrected to 77°F and full electrolyte level (fluid at the bottom of the maximum level indication mark), of each connected cell is greater than or equal to 1.200 and has not decreased more than 0.03 from the value observed during the previous test. ITS 3.8.6 does not include these Surveillances. This changes the CTS by deleting these Surveillances.	N/A	4.8.2.3.2.a.1, 4.8.2.3.2.a.2, 4.8.2.3.2.b.2, 4.8.2.5.2.a.1, 4.8.2.5.2.a.2, 4.8.2.5.2.b.2	5
3.8.6 L.4	CTS 4.8.2.3.2.a.3 and CTS 4.8.2.5.2.a.3 require the verification that the pilot cell voltage is ≥ 2.13 V. CTS 4.8.2.3.2.b.1 and CTS 4.8.2.5.2.b.1 require the verification that the connected cell voltage is ≥ 2.13 V. ITS SR 3.8.6.2 requires the verification of each pilot cell voltage is ≥ 2.07 V. ITS SR 3.8.6.5 requires the verification that each battery connected cell voltage is ≥ 2.07 V. This changes the CTS by reducing the acceptance criteria for pilot cell and battery connected cell voltage limits from ≥ 2.13 V to ≥ 2.07 V.	SR 3.8.6.5	4.8.2.3.2.a.3, 4.8.2.3.2.b.1, 4.8.2.5.2.a.3, 4.8.2.5.2.b.1	6

Table L - Less Restrictive Changes
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.6 L.5	CTS 4.8.2.3.2.b.3 and CTS 4.8.2.5.2.b.3 require the verification that the battery electrolyte level of each connected cell is between the top of the minimum level indication mark and the bottom of the maximum level indication mark. ITS SR 3.8.6.3 requires the verification that the battery connected cell electrolyte level is greater than or equal to minimum established design limits. This changes the CTS by deleting the specific value for the lower electrolyte level limit and deleting the upper electrolyte level limit requirement.	SR 3.8.6.3	4.8.2.3.2.b.3, 4.8.2.5.2.b.3	6
3.8.6 L.6	CTS 4.8.2.3.2.e requires the performance of a battery performance test on the Trains A and B 250 VDC batteries. CTS 4.8.2.5.2.e requires the performance of a battery performance test on the Train N 250 VDC battery. These tests must be performed during shutdown (MODES 5 or 6). ITS SR 3.8.6.6 requires the same tests. A Note to SR 3.8.6.6 specifies that this Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. This changes the CTS by allowing the test to be performed in MODES other than MODE 5 or 6 as long as an assessment determines the safety of the unit is maintained or enhanced.	SR 3.8.6.6 Note	4.8.2.3.2.e, 4.8.2.5.2.e	12
3.8.6 L.7	CTS 4.8.2.3.2.e requires the performance of a battery performance test on the Trains A and B 250 VDC batteries. CTS 4.8.2.5.2.e requires the performance of a battery performance test on the Train N 250 VDC battery. ITS SR 3.8.6.6 requires the performance of a performance discharge test or a modified performance discharge test. This changes the CTS by adding the allowance to perform a modified performance discharge test instead of the performance discharge test.	SR 3.8.6.6	4.8.2.3.2.e, 4.8.2.5.2.e	6
3.8.7 L.1	The CTS 3.8.2.1 Action specifies the compensatory for one or more inoperable 120 VAC inverters. The compensatory action is to restore the inoperable inverters to OPERABLE status within 8 hours. ITS 3.8.7 ACTION A covers the condition of one Train A or Train B inoperable inverter. ITS 3.8.7 ACTION A requires the restoration of the inoperable inverter within 24 hours. However, the additional 16 hours is only allowed if the associated 120 VAC vital bus remains energized. This changes the CTS by allowing one inverter to be inoperable for 24 hours, provided the associated 120 VAC vital bus remains energized. The change to the number of inverters that can be inoperable is discussed in DOC M.1.	3.8.7 Required Action A.1	3.8.2.1 Action	4

Table L - Less Restrictive Changes
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.8 L.1	CTS 3.8.2.2 Action a specifies the compensatory actions for a required inoperable AC electrical distribution subsystem. These actions apply to one or more required inoperable inverters. One of the compensatory actions is the suspension of positive reactivity "changes except: 1) heatup or cooldown of the reactor coolant volume provided that SHUTDOWN MARGIN sufficient to accommodate the change in temperature is maintained in accordance with Specification 3.1.1.2 in MODE 5 or Specification 3.9.1 in MODE 6, and the heatup or cooldown rate is restricted to 50°F or less in any one-hour period in MODE 5, or 2) addition of water from the RWST, provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2." ITS 3.8.8 Required Action A.3 requires the immediate suspension of operations involving positive reactivity "additions that could result in loss of required SDM or boron concentration." This changes the CTS compensatory actions by deleting the limitation on the heatup and cooldown rates of 50ºF or less in any one hour period in MODE 5 and allows the addition of water from any source including the RWST as long as SDM and boron concentration limitations are met.	3.8.8 Required Action A.3	3.8.2.2 Action a	4
3.8.9 L.1	CTS LCO 3.8.2.1 footnote * requires the 120 VAC vital buses to be energized from their associated inverters connected to a DC bus. There is no other LCO requirement for the inverters to be OPERABLE. In the ITS, the inverters are placed in a separate Specification (either ITS 3.8.7 for MODES 1, 2, 3, and 4 or ITS 3.8.8 for the MODES 5 and 6, and during movement of irradiated fuel assemblies in the containment, auxiliary building, and opposite unit containment). The 120 VAC vital buses remain in their own separate Specifications during these same conditions (ITS 3.8.9 and ITS 3.8.10, respectively). When an inverter is inoperable, a 24 hour allowed time is provided to restore the inverter to OPERABLE status. During this 24 hours, the 120 VAC vital bus remains OPERABLE provided it is energized. In the STS Bases, the 120 VAC vital buses remain OPERABLE as long as they can be energized from a qualified source. The CNP ITS 3.8.9 Bases state that the qualified sources are the inverter powered from DC Sources and the Class 1E regulated 600/120 VAC transformer via the inverter. This changes the CTS by allowing the 120 VAC vital buses to be called OPERABLE when powered from a source other than the inverter connected to a DC bus.	LCO 3.8.9.b	LCO 3.8.2.1 footnote *	1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.10 L.1	CTS 3.8.2.2 Action a specifies the compensatory actions for a required inoperable AC electrical power distribution subsystem. CTS 3.8.2.4 Action a specifies the compensatory actions for an inoperable required DC electrical power distribution subsystem. The compensatory actions for both Specifications are identical. One of the compensatory actions is the suspension of positive reactivity "changes except: 1) heatup or cooldown of the reactor coolant volume provided that SHUTDOWN MARGIN sufficient to accommodate the change in temperature is maintained in accordance with Specification 3.1.1.2 in MODE 5 or Specification 3.9.1 in MODE 6, and the heatup or cooldown rate is restricted to 50°F or less in any one-hour period in MODE 5, or 2) addition of water from the RWST, provided the boron concentration in the RWST is greater than or equal to the minimum required by Specification 3.1.2.7.b.2." ITS 3.8.10 Required Action A.2.3 requires the immediate suspension of operations involving positive reactivity "additions that could result in loss of required SDM or boron concentration." This changes the CTS compensatory actions by deleting the limitation on the heatup and cooldown rates of 50ºF or less in any one hour period in MODE 5 and allows the addition of water from any source including the RWST as long as SDM and boron concentration limitations are met.	3.8.10 Required Action A.2.3	3.8.2.2 Action a, 3.8.2.4 Action a	4

Table L - Less Restrictive Changes
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.1 L.1	CTS 3.9.1 provides limits on the boron concentration of all filled portions of the Reactor Coolant System and the refueling canal when in MODE 6. ITS 3.9.1 modifies this requirement with a Note which states "Only applicable to the refueling canal and refueling cavity when connected to the RCS." This changes the CTS by eliminating the applicability of the boron concentration limits on the refueling canal and refueling cavity when those volumes are not connected to the RCS. In addition, ITS SR 3.9.1.2 requires a verification that the boron is within the limit specified in the COLR once within 72 hours prior to connecting the refueling canal and refueling cavity to the RCS.	3.9.1 Applicability Note	3.9.1 Applicability	2
3.9.1 L.2	CTS 3.9.1 Action a states that when the boron concentration requirement is not met, initiate and continue boration at ≥ 34 gpm of 6,550 ppm boric acid solution or its equivalent until k_{eff} is reduced to ≤ 0.95 or the boron concentration is restored to ≥ 2400 ppm, whichever is the more restrictive. ITS 3.9.1 Required Action A.3 requires initiation of action to restore boron concentration to within limit. This changes the CTS by eliminating the specific requirements for the boric acid solution to be used to restore compliance with the LCO.	3.9.1 Required Action A.3	3.9.1 Action a	4
3.9.1 L.3	CTS 4.9.1.1 requires the LCO reactivity condition to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full length control rod in excess of 3 feet from its fully inserted position. ITS 3.9.1 does not contain this Surveillance Requirement.	N/A	4.9.1.1	5
3.9.2 L.1	Not used.			1
3.9.2 L.2	CTS 3.9.2 Action a states that with fewer than two source range neutron flux monitors operating, immediately suspend all operations involving positive reactivity changes except addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2 (i.e., 2400 ppm). ITS 3.9.2 Required Action A.2 states "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, Boron Concentration." This allows positive reactivity changes provided they do not reduce the boron concentration below the refueling limit. This changes the CTS requirements by allowing limited positive reactivity additions from sources in addition to the RWST.	3.9.2 Required Action A.2	3.9.2 Action a	4
3.9.2 L.3	CTS 3.9.2 Action a requires the immediate suspension of CORE ALTERATIONS or positive reactivity changes except for the addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2, in the event one source range neutron flux monitor with audible indication in the containment is not operating. ITS 3.9.2 ACTION C requires initiation of action to isolate unborated water sources in the event the required source range audible count rate circuit is inoperable. This changes the CTS by replacing the Action to immediately suspend CORE ALTERATIONS or positive reactivity changes except for the addition of water from the RWST, provided the boron concentration in the RWST is greater than the minimum required by CTS 3.1.2.7.b.2, in the event one source range monitor with audible indication in the containment is not operating, with the Action to initiate action to isolate unborated water sources.	3.9.2 ACTION C	3.9.2 Action a	4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.2 L.4	CTS 4.9.2.b requires a CHANNEL CALIBRATION of each source range neutron flux monitor every 18 months. ITS SR 3.9.2.2 requires the performance of a CHANNEL CALIBRATION every 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	SR 3.9.2.2	4.9.2.b	11
3.9.3 L.1	CTS 3.9.4 and CTS 3.9.9 are applicable during CORE ALTERATIONS and movement of irradiated fuel within the containment. ITS 3.9.3 is applicable during movement of irradiated fuel assemblies within containment. References to CORE ALTERATIONS in CTS 3.9.4 are eliminated in the Applicability, Action, and Surveillances. References to CORE ALTERATIONS in CTS 3.9.9 are eliminated in the Applicability and Surveillances. This changes the CTS by eliminating requirements for containment closure and the Containment Purge and Exhaust Isolation System during CORE ALTERATIONS.	3.9.3 Applicability	3.9.4 Applicability, 3.9.4 Action, 4.9.4, 3.9.9 Applicability	2
3.9.3 L.2	CTS 4.9.4 states that specified containment penetration Surveillances shall be performed, in part, "within 100 hours prior to the start of" the specified conditions in the Applicability. ITS SR 3.9.3.1 and ITS SR 3.9.3.2 do not include the "within 100 hours prior to the start of" Frequency. ITS SR 3.0.1 states "SRs shall be met during the MODES or other specified conditions in the Applicability for the individual LCOs, unless otherwise stated in the SR." Therefore, the ITS requires that the Surveillances must be met prior to the initiation of movement of irradiated fuel. This changes the CTS by eliminating the stipulation that the Surveillances be met within 100 hours prior to entering the conditions specified in the Applicability.	SR 3.9.3.1, SR 3.9.3.2	4.9.4	7
3.9.3 L.3	CTS 4.9.4 and CTS 4.9.9 include a Surveillance Frequency of "once per 7 days" during conditions specified in the Applicability for performing Surveillance of the Containment Purge Supply and Exhaust System. The ITS SR 3.9.3.2 Frequency for the same requirement is 24 months. ITS SR 3.9.3.2 is also modified by a Note that states that SR 3.9.3.2 is not required to be met for containment purge supply and exhaust valve(s) in penetrations that are closed to comply with LCO 3.9.3.c.1. This changes the CTS by changing the Surveillance Frequency from 7 days to 24 months and adding the Note that the SR is not required to be met for containment purge supply and exhaust valve(s) in penetrations that are closed to comply with ITS LCO 3.9.3.c.1.	SR 3.9.3.2 (including Note)	4.9.4, 4.9.9	7
3.9.3 L.4	CTS 4.6.3.1.2.c requires verification of the automatic actuation of the Containment Purge and Exhaust valves on a Containment Purge and Exhaust isolation signal (i.e., a test signal). ITS SR 3.9.3.2 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.9.3.2	4.6.3.1.2.c	6

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.4 L.1	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. This CTS Action is modified by a footnote which states that addition of water from the RWST does not constitute a dilution activity provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2 (i.e., 2400 ppm). ITS 3.9.4 Required Action A.1 states that with the RHR loop requirements not met, 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, "Boron Concentration." ITS 3.9.1 requires boron concentration to be within limit. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.9.1, to be added to the RCS from sources other than the RWST when the RHR requirements are not met.	3.9.4 Required Action A.1	3.9.8.1 Action a (including footnote *)	4
3.9.4 L.2	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.4 Required Actions A.4, A.5, and A.6 state that with the RHR loop requirements not met, within 4 hours close and secure the equipment hatch with at least four bolts, close one door in each air lock, and verify each penetration providing direct access from the containment atmosphere to the outside atmosphere is either closed with a manual or automatic isolation valve, blind flange, or equivalent, or is capable of being closed by an OPERABLE Containment Purge Supply and Exhaust System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge Supply and Exhaust System to remain open when the RHR requirements are not met.	3.9.4 Required Action A.6	3.9.8.1 Action a	4
3.9.5 L.1	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. This CTS Action is modified by a footnote which states that addition of water from the RWST does not constitute a dilution activity provided the boron concentration in the RWST is greater than the minimum required by Specification 3.1.2.7.b.2 (i.e., 2400 ppm). ITS 3.9.5 Required Action B.1 states that with no RHR loop in operation, 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, "Boron Concentration." ITS 3.9.1 requires boron concentration to be within limit. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in ITS LCO 3.9.1, to be added to the RCS from sources other than the RWST when the RHR loops are not in operation.	3.9.5 Required Action B.1	3.9.8.1 Action a	4

Table L - Less Restrictive Changes
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L.2	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. ITS 3.9.5 Required Actions B.3, B.4, and B.5 state that with no RHR loop in operation, within 4 hours close and secure the equipment hatch with at least four bolts, close one door in each air lock, and verify each penetration providing direct access from the containment atmosphere to the outside atmosphere is either closed with a manual or automatic isolation valve, blind flange, or equivalent, or is capable of being closed by an OPERABLE Containment Purge Supply and Exhaust System. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge Supply and Exhaust System to remain open when no RHR loop is in operation.	3.9.5 Required Action B.5	3.9.8.1 Action a	4
3.9.5 L.3	ITS 3.9.5 is modified by two LCO Notes. Note 1 allows all RHR pumps to be removed from operation for ≤ 15 minutes when switching from one loop to another, provided several conditions are met. Note 2 allows one required RHR loop to be inoperable for up to 2 hours for Surveillance testing, provided that the other loop is OPERABLE and in operation. Neither CTS 3.9.8.1 nor CTS 3.9.8.2 contain these allowances. This changes the CTS by allowing the LCO to not be met under certain situations.	LCO 3.9.5 Notes 1 and 2	N/A	1
3.9.5 L.4	CTS 4.9.8.2 requires verification that each RHR loop is OPERABLE per Specification 4.0.5. ITS 3.9.5 does not contain this Surveillance. This changes the CTS by deleting this specific Surveillance.	N/A	4.9.8.2	5
3.9.6 L.1	CTS 3.9.10 states that at least 23 feet of water must be maintained over the reactor pressure vessel flange in MODE 6 during movement of fuel assemblies or control rods within the reactor pressure vessel. The CTS 3.9.10 Action requires suspension of movement of fuel assemblies or control rods within the pressure vessel if the water level requirement is not met. ITS 3.9.6 states the refueling cavity water level shall be maintained ≥ 23 feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. ITS 3.9.6 Required Action A.1 requires the suspension of movement of irradiated fuel assemblies within containment. This changes the CTS restricting the Applicability and ACTIONS from movement of any "fuel assemblies" within the reactor pressure vessel to movement of "irradiated fuel assemblies" within containment. The change eliminating MODE 6 is discussed in DOC A.2. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M.1. The change eliminating control rods is discussed in DOC L.2.	3.9.6 Applicability, 3.9.6 Required Action A.1	3.9.10 Applicability, 3.9.10 Action	2

Table L - Less Restrictive Changes
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.6 L.2	CTS 3.9.10 requires the refueling cavity water level to be maintained at least 23 feet over the top of the reactor pressure vessel flange during movement of fuel assemblies or control rods within the reactor pressure vessel while in MODE 6. The CTS 3.9.10 Action requires suspension of all operations involving movement of the fuel assemblies or control rods within the pressure vessel in the event the LCO is not met. CTS 4.9.10 requires a determination of the refueling canal water level during the movement of fuel assemblies or control rods. ITS 3.9.6 requires the refueling cavity water level to be maintained greater than or equal to 23 feet above the top of the reactor vessel flange during movement of irradiated fuel assemblies within containment. This changes the CTS by deleting the requirement that the LCO, ACTIONS, and Surveillance is applicable during control rod movement. The change to "irradiated fuel assemblies" from "fuel assemblies" is discussed in DOC L.1. The change eliminating MODE 6 is discussed in DOC A.2. The change from within "the reactor pressure vessel" to within "containment" is discussed in DOC M.1.	3.9.6 Applicability	3.9.10 Applicability, 3.9.10 Action, 4.9.10	2
3.9.6 L.3	CTS 4.9.10 requires the refueling cavity water level to be determined to be within limit "within 2 hours prior to the start of" and at least once per 24 hours thereafter during movement of fuel assemblies or control rods. ITS SR 3.9.6.1 requires verification that the refueling cavity water level is within limit every 24 hours. This changes the CTS by reducing the Frequency for verifying refueling cavity water level from 2 hours before entering the Applicability of the LCO to 24 hours before entering the Applicability of the LCO.	SR 3.9.6.1	4.9.10	7

Table L - Less Restrictive Changes
ITS Chapter 4.0 - Design Features

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
NONE	NONE	NONE	NONE	NONE

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.5 L.1	License Conditions 2.H (Unit 1) and 2.G (Unit 2) specify that the integrated leak test requirements for each system outside containment that would or could contain highly radioactive fluids during a serious transient or accident must be performed at a frequency not to exceed refueling cycle intervals. ITS 5.5.2 specifies that the same test must be performed at least once per 24 months and an allowance has been added which states that the provisions of ITS SR 3.0.2 are applicable. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., the current CNP normal refueling cycle interval) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in ITS SR 3.0.2).	5.5.2	License Condition 2.H (Unit 1), License Condition 2.I (Unit 2)	10
5.5 L.2	CTS 3.6.1.2.a specifies that the overall integrated leakage rate shall be limited to ≤ L_a. CTS 3.6.1.2.b specifies that combined leakage rate shall be limited to ≤ 0.60 L_a for all penetrations and valves subject to Types B and C tests. However, the CTS 3.6.1.2 Action does not allow the unit to increase Reactor Coolant System temperature above 200°F if either the measured overall integrated leakage rate exceeds 0.75 L_a or if the measured combined leakage rate for all penetrations and valves subject to Type B and C tests exceeds 0.60 L_a. ITS 5.5.14 specifies that the containment leakage rate acceptance criterion is 1.0 L_a and that during the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are ≤ 0.60 L_a for the Type B and C tests and ≤ 0.75 L_a for Type A tests. This changes the CTS by only requiring the 0.60 L_a and 0.75 L_a limits to be met during the first unit startup following testing in accordance with the Containment Leakage Rate Testing Program.	5.5.14	3.6.1.2.a, 3.6.1.2.b, 3.6.1.2 Action	1
5.5 L.3	CTS 4.7.5.1.c, 4.7.5.1.e.1, 4.7.6.1.b, 4.7.6.1.d.1, 4.9.12.b, and 4.9.12.d.1 require the performance of ventilation filter testing once per 18 months. ITS 5.5.9 requires these same Surveillances to be performed once per 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).	5.5.9, 5.5.9.a, 5.5.9.b, 5.5.9.c, 5.5.9.d	4.7.5.1.c, 4.7.5.1.e.1, 4.7.6.1.b, 4.7.6.1.d.1, 4.9.12.b, 4.9.12.d.1	10
5.5 L.4	CTS 4.7.5.1.d.2 requires the performance of a halogenated hydrocarbon refrigerant gas test on the CREV System charcoal adsorber and a DOP test on the CREV System HEPA filter banks after the reinstallation of the adsorber tray used for obtaining a carbon sample. CTS 4.7.6.1.b.4 and 4.7.6.1.c.2 require the performance of a halogenated hydrocarbon refrigerant gas test on the ESF Ventilation System charcoal adsorber after the reinstallation of the adsorber tray used for obtaining a carbon sample. CTS 4.9.12.b.4 and 4.9.12.c.2 require the performance of a halogenated hydrocarbon refrigerant gas test on the FHAEV System charcoal adsorber after the reinstallation of the adsorber tray used for obtaining a carbon sample. ITS 5.5.9 does not contain these explicit post maintenance testing requirements. This changes the CTS by deleting these explicit post maintenance requirements.	N/A	4.7.5.d.2, 4.7.6.1.b.4, 4.7.6.1.c.2, 4.9.12.b.4, 4.9.12.c.2	5
5.5 L.5	CTS 4.8.1.1.2.c.4 requires the evaluation that certain diesel fuel oil properties are within the appropriate limits within 31 days of obtaining the sample. ITS 5.5.11.b requires this same evaluation to be performed within 31 days following addition of the new fuel oil to the storage tanks. This changes the CTS by changing the time by which the evaluation for these properties must be completed.	5.5.11.b	4.8.1.1.2.c.4	7

Table L - Less Restrictive Changes
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
5.5 L.6	Operating License Conditions 2.C.(7) (Unit 1) and 2.C.(3)(v) (Unit 2) specify that the Secondary Water Chemistry Monitoring Program shall be described in the station chemistry manual and provides a description of what the manual should contain. ITS 5.5.8 does not specify that the program must be described in the station chemistry manual. It only states what shall be included in the Secondary Water Chemistry Program. This changes the CTS by deleting the details of where the description of the Secondary Water Chemistry Program shall reside from the Technical Specifications.	5.5.8	License Condition 2.C.(7) (Unit 1), License Condition 2.C.(3)(v) (Unit 2)	1
5.6 L.1	CTS 6.9.1.1, CTS 6.9.1.2, and CTS 6.9.1.3 contain requirements for submitting a report of plant startup and power escalation testing following receipt of an operating license; amendments to the license involving planned increase in power level; installation of fuel that has a different design or has been manufactured by a different fuel supplier; and modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.9.1.1, CTS 6.9.1.2, and CTS 6.9.1.3.	N/A	6.9.1.1, 6.9.1.2, 6.9.1.3	8
5.6 L.2	CTS 6.9.1.4 requires annual reports described in CTS 6.9.1.5, which include the Occupational Radiation Exposure Report, to be submitted prior to March 1 of each year. CTS 6.9.1.6 requires the Annual Radiological Environmental Operating Report to be submitted before May 1 of each year. ITS 5.6.1 requires the Occupational Radiation Exposure Report to be submitted by April 30 of each year. ITS 5.6.2 requires the Annual Radiological Environmental Operating Report to be submitted by May 15 of each year. This changes the CTS by allowing an additional time to submit these reports each year.	5.6.1, 5.6.2	6.9.1.4, 6.9.1.6	1
5.6 L.3	CTS 6.9.1.5.c and 6.9.1.8 require annual and monthly reporting of all challenges to the Reactor Coolant System pressurizer operated relief valves (PORVs) or safety valves. ITS 5.6 does not include these reporting requirements. This changes the CTS by deleting the requirement to include documentation of all challenges to the Reactor Coolant System PORVs or safety valves in the annual and monthly reports.	N/A	6.9.1.5.c, 6.9.1.8	8
5.6 L.4	CTS 6.9.1.5.d requires annual reporting of information regarding any instances when the I-131 specific activity limit for the primary coolant is exceeded. ITS 5.6 does not contain any requirements for such a report. This changes the CTS by not including the requirements for the annual reporting of instances when the Technical Specification I-131 specific activity limit for the primary coolant is exceeded.	N/A	6.9.1.5.d	8

Table L - Less Restrictive Changes
Change Categories

Change Categories:
1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation of Surveillance Requirement Acceptance Criteria
7 - Relaxation of Surveillance Frequency, Non-24 Month Type Change
8 - Deletion of Reporting Requirements
9 - Surveillance Frequency Change using GL 91-04 Guidelines, non-24 Month Type Change
10 -18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type
11 - 18 to 24 Month Surveillance Frequency Change, Channel Calibration Type
12 - Deletion of Surveillance Requirement Shutdown Performance Requirements
13 - Not used
14 - Changing Instrumentation Allowable Values

Attachment 5 to AEP:NRC:5901-01

REPLACEMENT PAGES FOR
DRAFT SAFETY EVALUATION ATTACHMENT 5,
TABLE LA - REMOVED DETAILS

ATTACHMENT 5

Table LA - Removed Details

Table LA - Removed Details
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
1.0 LA.1	Table 1.1	CTS Table 1.1, "OPERATIONAL MODES," states that MODE 6 is restricted to reactivity conditions with $k_{eff} \leq 0.95$. ITS Table 1.1-1,"MODES," does not contain this restriction.	3.9.1 Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Chapter 2.0 – Safety Limits

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
2.0 LA.1	2.1.1	CTS 2.1.1 requires that the combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant average temperature not exceed the limits in Figure 2.1-1. ITS 2.1.1 states that the combination of THERMAL POWER, RCS highest loop average temperature, and pressurizer pressure shall not exceed the limits specified in the COLR and provides specific limits on DNBR and peak fuel centerline temperature. This changes the CTS by relocating limits that must be confirmed on a cycle specific basis to the COLR. The limiting Safety Limit parameters are retained in the SL.	COLR	ITS 5.6.5	5
2.0 LA.2	6.7.1.a, 6.7.1.b, 6.7.1.c	In the event that a Safety Limit is violated, CTS 6.7.1.a requires the Chairman of the NSRB to be notified within 24 hours, CTS 6.7.1.b requires the Safety Limit Violation Report to be reviewed by the PORC, and CTS 6.7.1.c requires the report to be submitted to the Chairman of the NSRB and the Senior Vice President - Nuclear Operations within 14 days of the violation. The ITS does not include these requirements; they have been relocated to the Quality Assurance Program Description (QAPD).	QAPD	10 CFR 50.54	3

Table LA - Removed Details
ITS Section 3.0 – LCO and SR Applicability

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
NONE	NONE	NONE	NONE	NONE	NONE

Table LA - Removed Details
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.1 LA.1	3.1.1.1, 4.1.1.1.1, 3.1.1.2, 4.1.1.2	CTS 3.1.1.1 and associated Action and CTS 4.1.1.1.1 require that the SDM be ≥ 1.3% Δk/k when in MODES 1, 2, 3, and 4. CTS 3.1.1.2 and associated Action and CTS 4.1.1.2 requires that the SDM be ≥ 1.0% Δk/k when in MODE 5. ITS 3.1.1 states that the SDM shall be within the limits of the COLR, ITS 3.1.1 ACTION A provides actions for when the SDM is not within the limits, and ITS SR 3.1.1.1 requires verification that the SDM is within limits. This changes the CTS by relocating the SDM limits, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.5	5
3.1.1 LA.2	4.1.1.1.1.e, 4.1.1.2.b	CTS 4.1.1.1.1.e and 4.1.1.2.b require determination that the SDM is within limits, and specifically require the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, samarium concentration, and boron penalty (MODES 4 and 5 only). ITS SR 3.1.1.1 requires determination that SDM is within limits, but does not describe the factors that must be considered in the calculation. This information is relocated to the Bases. This changes the CTS by removing details on how the SDM calculation is performed from the Specifications and placing the information in the TS Bases.	Bases	ITS 5.5.12	3
3.1.2 LA.1	4.1.1.1.2, 4.1.1.1.1.e	CTS 4.1.1.1.2 requires comparison of the actual and predicted core reactivity balance and specifically requires consideration of at least those factors stated in Specification 4.1.1.1.1.e. CTS 4.1.1.1.1.e requires determination of SDM and requires the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.2.1 requires comparison of the actual and predicted core reactivity, but does not describe the factors that must be considered in the calculation. This information is relocated to the Bases. This changes the CTS by removing details on how the core reactivity balance comparison calculation is performed from the CTS and placing the information in the ITS Bases.	Bases	ITS 5.5.12	3
3.1.4 LA.1	3.1.3.1 Action a	CTS 3.1.3.1 Action a applies when one or more full length rods are inoperable "due to being immovable as a result of excessive friction or mechanical interferences or known to be untrippable." ITS 3.1.4 Condition A applies when one or more rod(s) are inoperable. ITS 3.1.4 Condition A does not list the ways in which the rods can be inoperable (i.e., "due to being immovable as a result of excessive friction or mechanical interferences or known to be untrippable"). This changes the CTS by moving the details of the reason the rod is considered inoperable to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.1.7 LA.1	LCO 3.1.3.2	CTS LCO 3.1.3.2 requires all shutdown and control rod position indicator channels and the demand position indication system to be OPERABLE and capable of determining the control rod positions within the allowed rod misalignment specified in Specification 3.1.3.1. ITS LCO 3.1.7 requires both the Rod Position Indication System and the Demand Position Indication System to be OPERABLE, but the details of what constitutes an OPERABLE system are moved to the TS Bases. This changes the CTS by removing details of what constitutes an OPERABLE system to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.2.1 LA.1	3.2.2	CTS 3.2.2 states that $F_Q(Z)$ shall be limited by an equation, which is contained in the LCO. Two of the four parameters in the CTS equation are already located in the CORE OPERATING LIMITS REPORT (COLR). The other two parameters are actually specified in the LCO. ITS LCO 3.2.1 states "$F_Q(Z)$, as approximated by $F^C_Q(Z)$ and $F^W_Q(Z)$, shall be within the limits specified in the COLR." This changes the CTS by relocating the two parameters that are in the LCO, as well as the equation, to the COLR. This also changes the CTS by using the term "$F^C_Q(Z)$" in lieu of "$F_Q(Z)$."	COLR	ITS 5.6.5	5
3.2.1 LA.2	3.2.6	CTS 3.2.6 states that Allowable Power Level (APL) shall be limited by an equation, which is contained in the LCO. Three of the five parameters in the CTS equation are already located in the CORE OPERATING LIMITS REPORT (COLR). The other two parameters are actually specified in the LCO. ITS LCO 3.2.2 states "$F_Q(Z)$, as approximated by $F^C_Q(Z)$ and $F^W_Q(Z)$, shall be within the limits specified in the COLR." This changes the CTS by relocating the two parameters that are in the LCO, as well as the equation and the allowance that the $F^W_Q(Z)$ limit is not applicable in certain core regions to the COLR. The change from APL to $F^W_Q(Z)$ is described in DOC A.4.	COLR	ITS 5.6.5	5
3.2.2 LA.1	3.2.3	CTS 3.2.3 states that $F^N_{\Delta H}$ shall be limited by an equation, which is contained in the LCO. Two of the three parameters in the CTS equation are as specified in the CORE OPERATING LIMITS REPORT (COLR). ITS LCO 3.2.2 states "$F^N_{\Delta H}$ shall be within the limits specified in the COLR." This changes the CTS by relocating the entire equation to the COLR.	COLR	ITS 5.6.5	5
3.2.2 LA.2	3.2.3 Actions b and c	CTS 3.2.3 Actions b and c require $F^N_{\Delta H}$ to be determined to be within its limit through in-core mapping and CTS 4.2.3 requires $F^N_{\Delta H}$ to be determined to be within its limit by using the movable incore detectors to obtain a power distribution map. ITS SR 3.2.2.1 just requires verification that $F^N_{\Delta H}$ is within its limit. This changes the CTS by relocating to the Bases the manner in which the $F^N_{\Delta H}$ determination is performed.	Bases	ITS 5.5.12	3
3.2.3 LA.1	3.2.1 Actions a.1, a.1.b), and a.2	CTS 3.2.1 Actions a.1, a.1.b), and a.2 specify Actions to be taken based upon 90% or 0.9 of Allowable Power Level (APL) (whichever is less) RTP. In ITS LCO 3.2.3.b and ACTIONS A, B, and C, the power level point is defined as "upper limit specified in the COLR." This changes the CTS by relocating the specific power level (with the CTS term APL changed to the appropriate term as described in ITS 3.2.1 DOC A.4) to the COLR.	COLR	ITS 5.6.5	5

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA.1	4.3.1.1.3 Note *	CTS 4.3.1.1.3 requires each RTS trip function to be response time tested. However, CTS 4.3.1.1.3 Note * exempts the neutron detectors from response time testing and specifies that the "response time of the neutron flux signal portion of the channel shall be measured from the detector output or input of first electronic component in channel." ITS SR 3.3.1.19 Note exempts the neutron detectors from response time testing, but does not include the detail of how to test the neutron flux signal portion of the channel. This changes the CTS by moving the descriptive wording from the Specification to the ITS Bases.	Bases	ITS 5.5.12	3
3.3.1 LA.2	Table 3.3-1 "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns	CTS Table 3.3-1 for RTS instrumentation has three columns stating various requirements for each function. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.1-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.1 LA.3	Table 3.3-1 Note * for Functional Units 1 and 6, Table 4.3-1 Note * for Functional Unit 1	CTS Table 3.3-1, including Note *, requires Functional Units 1 (Manual Reactor Trip) and 6 (Source Range Neutron Flux) channels to be OPERABLE "with the reactor trip system breakers in the closed position" and the control rod drive system capable of rod withdrawal. CTS Table 4.3-1 specifies the Surveillance Requirements for the Manual Reactor Trip channels and includes a similar applicability in Note *. ITS Table 3.3.1-1, including Footnote (a), requires Functions 1 (Manual Reactor Trip) and 5 (Source Range Neutron Flux) channels to be OPERABLE in MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or with one or more rods not fully inserted. This changes the CTS by moving the details on how to place the Rod Control System in a state capable of rod withdrawal (i.e., by using the reactor trip breakers) from the Technical Specifications to the ITS Bases. The change that adds the requirement concerning the position of the rods is discussed in DOC M.1 and the change that adds MODES 3, 4, and 5 is discussed in DOC A.18.	Bases	ITS 5.5.12	3
3.3.1 LA.4	Table 3.3-1 Note ##	CTS Table 3.3-1 Function 6 requires two Source Range Neutron Flux channels be OPERABLE in MODE 2 ##. Note ## states that the high voltage to the detector may be de-energized above P-6. ITS Table 3.3.1-1 Function 5, including Footnote (d), requires two OPERABLE Source Range Neutron Flux channels in MODE 2 below the P-6 (Intermediate Range Neutron Flux) interlock, and maintains the intent of the CTS requirement. This changes the CTS by moving the allowance that the high voltage to the detector may be de-energized above P-6 from the Specification to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA.5	Table 3.3-1 logic and function description for P-6, P-7, P-8, and P-10 Interlocks	CTS Table 3.3-1 specifies the functions and logic of the P-6, P-7, P-8, and P-10 interlocks. ITS Table 3.3-1 Functions 18.a, b, c, and d, do not include this information. The ITS only specifies the number of required channels or trains for each of the interlocks. This changes the CTS by moving the functional description and logic associated with each of the interlocks specified in CTS Table 3.3-1 to the Bases.	Bases	ITS 5.5.12	1
3.3.1 LA.6	Table 3.3-1 Functional Units 12 and 13	CTS Table 3.3-1 breaks down the Loss of Flow Function into two separate Functional Units; the reactor trips on Loss of Flow - Single Loop and on Loss of Flow - Two Loops. As stated in CTS Table 3.3-1 Functional Unit 12, the Loss of Flow - Single Loop is enabled above P-8, and as stated in CTS Table 3.3-1 Functional Unit 13, the Loss of Flow - Two Loops is enabled above P-7 and below P-8. The two separate Functional Units are also listed in CTS Table 4.3-1 (Functional Units 12 and 13). ITS Table 3.3.1-1 Function 10 provides the requirements for the Reactor Coolant Flow - Low (per loop) Function, but does not include the logic description of the Reactor Coolant Flow - Low (per loop) Function (i.e., on a two loop loss of flow above P-7 and below P-8 and on a single loop loss of flow above P-8). This changes the CTS by moving the logic details to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.1 LA.7	Table 2.2-1 Notes 1 and 2	CTS Table 2.2-1 Notes 1 and 2 provide descriptions of some of the factors in the Allowable Value formulas for the Overtemperature ΔT and Overpower ΔT Functional Units, specifically the descriptions concerning the lead-lag and rate lag controllers for T_{avg} dynamic compensation. ITS Table 3.3-1 Notes 1 and 2 include the same Allowable Value formula, but do not include these specific factor descriptions. This changes the CTS by moving these factor descriptions to the UFSAR.	UFSAR	10 CFR 50.59	1
3.3.1 LA.8	Table 2.2-1 Notes 1 and 2	CTS Table 2.2-1 for the Limiting Safety System Settings states the formulas for Overtemperature ΔT and Overpower ΔT Functional Units. ITS 3.3.1 in Table 3.3.1-1 lists the formulas for the Overtemperature ΔT and Overpower ΔT Functions with a reference that certain variables/constants are contained in the CORE OPERATING LIMITS REPORT (COLR). This changes the CTS by relocating specific parameters for the Overtemperature ΔT and Overpower ΔT Functions, which must be confirmed on a cycle- specific basis, from the Technical Specifications to the COLR.	COLR	ITS 5.6.5	5

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA.9	4.3-1 Note 10 for Functional Unit 1, Table 4.3-1 Note 11 for Functional Unit 21, Table 4.3-1 Note 12 for Functional Unit 23	CTS Table 4.3-1 Functional Unit 1 requires the performance of a CHANNEL FUNCTIONAL TEST for the Manual Reactor Trip Function, including the shunt and undervoltage trip devices. In addition, Table 4.3-1 Note 10 states that the CHANNEL FUNCTIONAL TEST shall "independently verify the OPERABILITY of the undervoltage and shunt trip circuits" and "verify the OPERABILITY of the bypass breaker trip circuits." CTS Table 4.3-1 Functional Unit 21 requires the performance of a CHANNEL FUNCTIONAL TEST for the Reactor Trip Breaker Shunt and Undervoltage Trip Functions. In addition, CTS Table 4.3-1 Note 11 states that the CHANNEL FUNCTIONAL TEST shall "independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers." CTS Table 4.3-1, Functional Unit 23 requires the performance of a CHANNEL FUNCTIONAL TEST for each Reactor Trip Bypass Breaker every 124 days and prior to each reactor startup if not performed in the previous 7 days. In addition, Note 12 states that the 124 day test includes a verification of the "local manual shunt trip" prior to placing the breaker in service, and Note 13 states that the prior to each startup test includes the "automatic undervoltage trip." ITS 3.3.1 requires a similar Surveillance (ITS SR 3.3.1.17) to be performed, however, the Surveillance does not include these quoted details. This changes the CTS by moving the details of the scope of the tests from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.3.1 LA.10	Table 2.2-1 Trip Setpoints	CTS 2.2.1 requires the RTS instrumentation setpoints to be set consistent with the Trip Setpoint values shown in Table 2.2-1. However, the CTS 2.2.1 Action is only required to be taken when the setpoint is less conservative than the Allowable Value column of Table 2.2-1. When the setpoint is less conservative than the Allowable Value, the channel is to be declared inoperable and adjusted consistent with the Trip Setpoint value. CTS Table 2.2-1 specifies both the Trip Setpoints and Allowable Values for the RTS Instrumentation Functional Units. ITS 3.3.1 requires the RTS instrumentation for each Function in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 specifies only the Allowable Values for the RTS Instrumentation Functions. The ITS also ties OPERABILITY of channels to the Allowable Values. This changes the CTS by moving the Trip Setpoints to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.1 LA.11	Table 2.2-1 Allowable Value units for Functional Units 11, 12 (including Note *), 13, and 14	CTS Table 2.2-1 Functional Unit 11 provides an Allowable Value of ≤ 93% of instrument span for the Pressurizer Water Level - High channels. CTS Table 2.2-1 Functional Unit 12 provides an Allowable Value of ≥ 89.1% of the design flow per loop for the Loss of Flow channels. In addition, Unit 1 CTS Table 2.2-1 Note * states that design flow is 1/4 Reactor Coolant System total flow rate from Table 3.2-1 (i.e., 341,100 gpm) and Unit 2 CTS Table 2.2-1 Note * states design flow is 91,600 gpm per loop. CTS Table 2.2-1 Functional Unit 13 provides an Allowable Value of ≥ 16% (Unit 1) and ≥ 19.2% (Unit 2) of narrow range instrument span for the Steam Generator Water Level - Low Low channels. CTS Table 2.2-1 Functional Unit 14 provides an Allowable Value of ≥ 4% of the narrow range instrument span for the SG Water Level - Low portion of the Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level channels. ITS Table 3.3.1-1 Function 9 provides an Allowable Value for the Pressurizer Water Level - High channels in terms of percent, but does not include the detail of the associated instrument span. ITS Table 3.3.1-1 Function 10 provides an Allowable Value for the Reactor Coolant Flow - Low (per loop) channels in terms of percent, but does not include the detail of the associated design flow per loop. ITS Table 3.3.1-1 Function 14 provides an Allowable Value for the Steam Generator Water Level - Low Low (per SG) channels in terms of percent, but does not include the detail of the associated narrow range instrument span. ITS Table 3.3.1-1 Function 15 provides an Allowable Value for the Steam Generator Water Level - Low (per SG) portion of the Steam Generator Level - Low (per SG) Coincident with Steam Flow/Feedwater Flow Mismatch (per SG) channels in terms of percent, but does not include the detail of the associated narrow range instrument span. This changes the CTS by moving the details of what the setting in % is based upon to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	1
3.3.2 LA.1	Table 3.3-4 Trip Setpoints and associated requirements	CTS LCO 3.3.2.1 requires the ESFAS instrumentation setpoints to be set consistent with the Trip Setpoint values shown in Table 3.3-4. CTS 3.3.2.1 Action a is required to be entered when the setpoint is less conservative than the Allowable Value. The channel is to be declared inoperable until adjusted consistent with the Trip Setpoint value. CTS Table 3.3-4 specifies the Trip Setpoints and Allowable Values for the ESFAS Instrumentation Functional Units. ITS 3.3.2 requires the ESFAS instrumentation for each Function in Table 3.3.2-1 to be OPERABLE. ITS Table 3.3.2-1 specifies the Allowable Values for the ESFAS Instrumentation Functions. This changes the CTS by moving the Trip Setpoints and associated requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA.2	Table 3.3-3 "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns and the logic description for the motor driven AFW pumps and valves and turbine driven AFW pump	CTS Table 3.3-3 for ESFAS instrumentation has three columns stating various requirements for each Functional Unit. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." In addition, the titles for CTS Table 3.3-3 Functional Units 6 and 7 provide clarifying information concerning motor driven and turbine driven AFW pump logic, and CTS Table 3.3-3 Functional Unit 6.b provides clarifying information concerning motor driven AFW pump and valve actuation logic, and CTS Table 3.3-3 Functional Unit 9.a MINIMUM CHANNELS OPERABLE column provides a parenthetical statement concerning the number of channels per train. ITS Table 3.3.2-1 does not retain the "TOTAL NO. OF CHANNELS" or "CHANNELS TO TRIP" columns, nor the logic description for the motor driven AFW pumps and valves and turbine driven AFW pumps, and the manual steam line isolation. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns and the logic description for the motor driven AFW pumps and valves and turbine driven AFW pump, and the manual steam line isolation to the Bases.	Bases	ITS 5.5.12	1
3.3.2 LA.3	Tables 3.3-3, 3.3-4, and 4.3-2 logic initiation details	CTS Tables 3.3-3, 3.3-4, and 4.3-2 Functional Unit 1 provides the ESFAS actuation Functions associated with Safety Injection, Turbine Trip, Feedwater Isolation, and Motor Driven Auxiliary Feedwater Pumps. CTS Tables 3.3-3, 3.3-4, and 4.3-2 Functional Unit 9.a states, in part, the Manual Initiation Function is associated with Reactor Trip (SI) and Essential Service Water System. ITS Table 3.3.2-1 Function 1 provides all the Functions associated with Safety Injection including the Manual Initiation Function. This changes the CTS by moving the details of the logic initiation from the Specification to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.2 LA.4	Table 3.3-3 logic and function description for P-11 and P-12 Interlocks	CTS Table 3.3-3 specifies the functions and logic of the P-11 and P-12 interlocks. ITS Table 3.3.2-1 Functions 8.b and 8.c do not include this information. The ITS only specifies that there are 3 channels for P-11 interlock and 4 channels for P-12 interlock. This changes the CTS by moving the functional description and logic associated with each of the interlocks specified in the Table to the Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.2 LA.5	Table 3.3-4 Allowable Value units for Functional Units 5.a, 6.a, and 7.a	CTS Table 3.3-4 Functional Unit 5.a provides an Allowable Value of ≤ 68% of narrow range instrument span for the Steam Generator Water Level - High High channels. CTS Table 3.3-4 Functional Units 6.a and 7.a provides an Allowable Value of ≥ 16% (Unit 1) and ≥ 19.2% (Unit 2) of narrow range instrument span for the Steam Generator Water Level - Low Low channels. ITS Table 3.3.2-1 Function 5.b provides an Allowable Value for the Steam Generator Water Level - High High channels in terms of percent, but does not include the detail of the associated narrow range instrument span. ITS Table 3.3.2-1 Function 6.c provides an Allowable Value for the Steam Generator Water Level - Low Low channels in terms of percent, but does not include the detail of the associated narrow range instrument span. This changes the CTS by moving the details of what the setting in % is based upon to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	1
3.3.2 LA.6	Table 4.3-2 Note 3 for Functional Units 1.c, 2.c, 3.b.3), 4.c, and 10.c	CTS Table 4.3-2, including Note 3, requires a CHANNEL FUNCTIONAL TEST for Functional Units 1.c and 10.c (Containment Pressure - High), and Functional Units 2.c, 3.b.3), and 4.c (Containment Pressure - High High), and includes requirements for exercising the transmitter "by applying a vacuum or pressure to the appropriate side of the transmitter." ITS SR 3.3.2.6 and associated Note requires the performance of a COT and the exercising of the transmitter, but does not include the information relating to the method of exercising the transmitter. This changes the CTS by moving the explicit method for performing the transmitter exercise to the ITS Bases. The change which changes this test from a CHANNEL FUNCTIONAL TEST to a COT is discussed in DOC A.10.	Bases	ITS 5.5.12	3
3.3.3 LA.1	Table 3.3-10 (Unit 2) and Table 3.3-11 (Unit 1) Instrument 16 and footnote**	Unit 1 CTS Table 3.3-11 and Unit 2 CTS Table 3.3-10, Instrument 16, Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication), states that the required train (equivalent to one channel in ITS nomenclature) includes three channels. ITS Table 3.3.3-1 Function 6 requires two channels of the Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) to be OPERABLE, but the details of what constitutes an OPERABLE channel are moved to the Bases. This changes the CTS by moving the details of what constitutes an OPERABLE channel to the Bases. The change to the number of required CTS Function 16 channels is discussed in DOC M.3.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.3 LA.2	Tables 4.3-7 (Unit 1) and 4.3-10 (Unit 2) Instrument 16 Note (2)	Unit 1 CTS Table 4.3-7 and Unit 2 CTS Table 4.3-10, Instrument 16, Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication), CHANNEL CHECK requirements are modified by Note (2). Note (2) allows, with one train of Reactor Vessel Level Indication inoperable, subcooling margin indication and core exit thermocouples to be used to perform a CHANNEL CHECK to verify the remaining Reactor Vessel Level Indication train is OPERABLE. ITS SR 3.3.3.1 requires the performance of a CHANNEL CHECK of the Reactor Coolant Inventory Tracking System (Reactor Vessel Level Indication) channels. This changes the CTS by moving the descriptive wording of the method for performing the CHANNEL CHECK to the ITS Bases.	Bases	ITS 5.5.12	3
3.3.3 LA.3	4.6.4.1	CTS 4.6.4.1 requires that each hydrogen analyzer be demonstrated OPERABLE by performing a CHANNEL CALIBRATION using calibration gas containing a four percent and fifteen percent nominal hydrogen gas, balance nitrogen. ITS SR 3.3.3.2 requires the hydrogen monitors to be subjected to a CHANNEL CALIBRATION. This change moves the CTS calibration gas requirements to the ITS Bases.	Bases	ITS 5.5.12	3
3.3.4 LA.1	Tables 3.3-9 and 4.3-6	CTS 3.3.3.5 requires the remote shutdown monitoring instrumentation in Table 3.3-9 to be OPERABLE. CTS Table 3.3-9 lists each of the required remote shutdown monitoring instruments, the measurement range of each instrument, the location of the remote shutdown monitoring instrumentation readout, and the minimum number of channels required for each instrument. CTS Table 4.3-6 lists the required remote shutdown monitoring instruments and their associated Surveillance Requirements. ITS LCO 3.3.4 states that the remote shutdown monitoring instrumentation Functions shall be OPERABLE. This changes the CTS by moving the details in Tables 3.3-9 and 4.3-6, with the exception of the Surveillance Requirements, from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.4 LA.2	LCO 3.3.3.5	CTS 3.3.3.5 states that the remote shutdown monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE "with readouts displayed external to the control room." ITS LCO 3.3.4 states that the remote shutdown monitoring instrumentation Functions shall be OPERABLE. This changes the CTS by moving the requirement for readouts displayed external to the control room from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.5 LA.1	Trip Setpoints requirements of 3.3.2.1, 3.3.2 1 Action a, and Table 3.3-4	CTS 3.3.2.1 requires the ESFAS instrumentation and interlocks setpoints to be set consistent with the Trip Setpoint values shown in Table 3.3-4. CTS 3.3.2.1 Action a is required to be entered when the setpoint is less conservative than the Allowable Value. The channel is to be declared inoperable until adjusted consistent with the Trip Setpoint value. CTS Table 3.3-4 specifies the Trip Setpoints and Allowable Values for the ESFAS Instrumentation Functions. ITS 3.3.5 requires the LOP DG Start Instrumentation Functions to be OPERABLE. ITS SR 3.3.5.3 specifies the Allowable Values for the LOP DG Start Instrumentation Functions. This changes the CTS by moving the Trip Setpoints and associated requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
3.3.5 LA.2	Table 3.3-3 "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" column for Functional Units 8.a and 8.b, Table 3.3-3 tag numbers for Functional Unit 8.b	CTS Table 3.3-3 for ESFAS instrumentation has three columns stating various requirements for the Loss of Voltage and Degraded Voltage Functions. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." In addition, CTS Table 3.3-3 also specifies the tag numbers of the emergency buses in each train that include the Degraded Voltage Function instrumentation. ITS LCO 3.3.5 does not retain the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns and does not include the tag numbers of the emergency buses that include the Degraded Voltage Function instrumentation. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns and emergency bus tag numbers to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.6 LA.1	Table 3.3-3 "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns	CTS Table 3.3-3 for ESFAS instrumentation has three columns stating various requirements for the Purge and Exhaust Isolation Functions. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." ITS Table 3.3.6-1 does not retain the "TOTAL NO. OF CHANNELS" and “CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the ITS Bases.	Bases	ITS 5.5.12	1
3.3.6 LA.2	Table 3.3-3, 3.3- 4, and 4.3-2 details of the Manual Initiation Function for Containment Purge Supply and Exhaust System isolation	CTS Tables 3.3-3, 3.3-4, and 4.3-2 provide requirements for Functions 9.b (Manual Containment Spray Containment Isolation - Phase "B" Containment Purge and Exhaust Isolation) and 9.c (Manual Containment Isolation - Phase "A" Containment Purge and Exhaust Isolation Function). ITS Table 3.3.6-1 provides requirements for Function 1 (Manual Initiation). This changes the CTS by moving the details of the Manual Initiation Function for Containment Purge Supply and Exhaust System isolation from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.3.6 LA.3	Trip Setpoints requirements of 3.3.2.1, 3.3.3.1, Tables 3.3-4 and 3.3-6, 3.3.2.1 Action a	CTS 3.3.2.1 requires the ESFAS instrumentation and interlocks setpoints to be set consistent with the Trip Setpoint values shown in Table 3.3-4 and the Trip Setpoint column in CTS Table 3.3-4 references CTS Table 3.3-6. CTS 3.3.3.1 requires the radiation monitoring instrumentation channels shown in Table 3.3-6 to be set consistent with the Trip Setpoint values shown in Table 3.3-6. The radiation monitoring channels in question are the same for both CTS 3.3.2.1 and CTS 3.3.3.1. In addition, CTS 3.3.2.1 Action a is required to be entered when the setpoint is less conservative than the Allowable Value. The channel is to be declared inoperable until adjusted consistent with the Trip Setpoint value. ITS 3.3.6 requires the Containment Purge Supply and Exhaust System Isolation Instrumentation Functions to be OPERABLE. ITS Table 3.3.6-1 specifies the Allowable Values for the Containment Purge Supply and Exhaust System Isolation Instrumentation Functions. This changes the CTS by moving the Trip Setpoints and associated requirements to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
3.3.8 LA.1	Table 3.3-1 "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns for Functional Unit 6	CTS Table 3.3-1 for Reactor Trip System instrumentation has three columns stating various requirements for the Source Range Neutron Flux Functions. These columns are labeled, "TOTAL NO. OF CHANNELS," "CHANNELS TO TRIP," and "MINIMUM CHANNELS OPERABLE." For CTS Table 3.3-1 Function 6.b, the "CHANNELS TO TRIP" column entry is "0" (i.e., the Function is required to provide an indication only function and is not required to have a trip function). ITS 3.3.8 does not retain the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns. This changes the CTS by moving the information of the "TOTAL NO. OF CHANNELS" and "CHANNELS TO TRIP" columns to the Bases. The "CHANNELS TO TRIP" information is presented in the form of a description of the indication requirements for the source range neutron flux channel of the Boron Dilution Monitoring Instrumentation.	Bases	ITS 5.5.12	1
3.3.8 LA.2		Not Used.			
3.3.8 LA.3	Table 3.3-1 Action 5.c	CTS Table 3.3-1 Action 5.c requires closure of the isolation valves for unborated sources "to the Chemical and Volume Control System." CTS Table 3.3-1 Action 5.c also requires the RWST to be isolated "from the Reactor Coolant System" if RWST boron concentration is not within the required limit in MODE 5. ITS 3.3.8 Required Action B.2.2.1 requires the unborated water source valves to be closed including the RWST in MODE 5 with RWST boron concentration < 2400 ppm and less than the boron concentration in the Reactor Coolant System. This changes the CTS by moving the details of which unborated water source isolation valves and RWST valves to close from the Technical Specifications to the Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3/4.3.3.1 LA.1	3/4.3.3.1 requirements for Instruments 1.A.i (including footnote +), 1.C.i, 1.C.1.b, 1.C.1.c, 1.C.ii, 1.C.iv, 1.C.iv.b, 1.C.iv.c, 3A (including footnote ***)	CTS 3/4.3.3.1 provides requirements for the radiation monitoring instrumentation in CTS Tables 3.3-6 and 4.3-3. CTS Table 3.3-6 and Table 4.3-3 provide requirements for the following radiation monitoring instruments: Upper Containment Area Monitor (Instrument 1.A.i); Noble Gas Effluent Monitors (Instruments 1.C.i.b, 1.C.i.c, 1C.ii.a, 1C.ii.b, 1C.ii.c, 1C.ii.d, 1.C.iv.b, and 1.C.iv.c); and Spent Fuel Storage Radiation Monitor (Instrument 3.A). The ITS does not include requirements for these radiation monitoring instruments. The Technical Specification function of these radiation monitoring instruments is only to provide indication and alarms. This changes the CTS by relocating the requirements for these radiation monitoring instruments to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
CTS 3/4.3.3.1 LA.2	3/4.3.3.1 requirements for Instruments 1.C.i, 1.C.i.a, 1.C.iii.a, 1.C.iv, 1.C.iv.a	CTS 3/4.3.3.1 provides requirements for the radiation monitoring instrumentation in CTS Tables 3.3-6 and 4.3-3. CTS Table 3.3-6 and Table 4.3-3 provide requirements for the following radiation monitoring instruments: Noble Gas Effluent Monitors (Instruments 1.C.i.a, 1.C.iii.a, and 1.C.iv.a). These instruments ensure 10 CFR 20 limits are met. The ITS does not include requirements for these radiation monitoring instruments. This changes the CTS by moving the requirements for these radiation monitoring instrumentation to the Offsite Dose Calculation Manual (ODCM).	ODCM	ITS 5.5.1	6
CTS 3/4.3.3.5.1	3/4.3.3.5.1	CTS 3/4.3.3.5.1 provides requirements for Appendix R remote shutdown instrumentation. The Appendix R remote shutdown instrumentation is used to ensure that a fire will not preclude achieving safe shutdown. This instrumentation is independent of areas where a fire could damage systems normally used to shutdown the reactor. However, the instrumentation is not used to detect a degradation of the reactor coolant pressure boundary, and is not assumed to mitigate a design basis accident (DBA) or transient event. The Appendix R remote shutdown instrumentation capability is consistent with the requirements of 10 CFR 50, Appendix R. The acceptability of the relocation of the Appendix R Technical Specification requirements from the plant Technical Specifications has already been endorsed by the NRC as indicated in Generic Letter 86-10. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	N/A

Table LA - Removed Details
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.1 LA.1	4.2.5.2	CTS 4.2.5.2 requires that the indicators which are used to determine RCS flow rate be subjected to a CHANNEL CALIBRATION at least once per 18 months. ITS 3.4.1 does not include this requirement. This changes the CTS by relocating the Surveillance Requirement to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4
3.4.1 LA.2	4.2.5.3	CTS 4.2.5.3 requires the RCS total flow rate to be determined by a power balance around the steam generators. ITS SR 3.4.1.4 requires the verification by precision heat balance that RCS total flow rate is greater than the limits. This changes the CTS by relocation of the procedural details on how to perform the heat balance (power balance around the steam generators) to the Bases and replacing it with "by a precision heat balance."	Bases	ITS 5.5.12	3
3.4.1 LA.3	Table 3.2-1 (Unit 1), 3.2.5 (Unit 2)	CTS Table 3.2-1 (Unit 1) and CTS 3.2.5 (Unit 2) place limits on DNB RCS T_{avg}, pressurizer pressure, and RCS total flow rate. ITS 3.4.1 states that the limits on RCS T_{avg} and pressurizer pressure shall not exceed the limits specified in the COLR. ITS 3.4.1 also requires RCS total flow rate to be greater than or equal to the limit specified in the COLR and that the minimum RCS total flow rate to be ≥ 341,100 gpm (Unit 1) and ≥ 366,400 gpm (Unit 2). This changes the CTS by relocating the specific values of RCS T_{avg}, pressurizer pressure, and RCS total flow rate, which must be confirmed on a cycle-specific basis, to the COLR.	COLR	ITS 5.6.5	5
3.4.1 LA.4	Table 3.2-1 footnote * (Unit 1), 3.2.5 footnote * (Unit 2)	CTS Table 3.2-1 Footnote * (Unit 1) and CTS 3.2.5 Footnote * (Unit 2) require the T_{avg} to be evaluated with the use of the indicated average of at least three OPERABLE instrument loops. CTS Table 3.2-1 Footnote *** (Unit 1) and CTS 3.2.5 Footnote *** (Unit 2) state that the limit specified for RCS total flow rate is the indicated value. ITS 3.4.1 does not provide these details. This changes the CTS by relocating the procedural details on how to perform the parameter comparison to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.1 LA.5	3.2.5.b	CTS 3.2.5.b places a lower limit on the RCS T_{avg} of 543.9 º F in MODE 1. Unit 2 ITS 3.4.1 does not include this requirement. This changes the Unit 2 CTS by moving the RCS T_{avg} lower limit in MODE 1 from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6
3.4.3 LA.1	3.4.9.1	CTS 3.4.9.1 states that the RCS (except the pressurizer) temperature and pressure shall be limited. The LCO also contains limits on RCS heatup and cooldown rates. ITS 3.4.3 states that the RCS pressure, RCS temperature, and RCS heatup and cooldown rates shall be maintained within limits. This changes the CTS by moving the exclusion of the pressurizer from the LCO to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.3 LA.2	3.4.9.1 Action	CTS 3.4.9.1 Action states that with any of the P/T limits exceeded, to perform an analysis to determine the effects of the out-of-limit condition on the fracture toughness properties of the RCS and to determine that the RCS remains acceptable for continued operations. ITS 3.4.3, ACTIONS A and C state that with the requirements of the LCO not met, restore the parameter(s) to within limit(s) and determine the RCS is acceptable for continued operation. This changes the CTS by moving the requirement to perform an analysis to determine the effects of the out-of-limit condition on the fracture toughness properties of the RCS to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.4 LA.1	4.4.1.1	CTS 4.4.1.1 states that the required reactor coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.4.1 states that each RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the Surveillance requirement to verify that the reactor coolant loops are circulating reactor coolant to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.5 LA.1	3.4.1.2	CTS 3.4.1.2 contains a description of what constitutes an OPERABLE RCS loop. ITS 3.4.5 does not include this description of what constitutes an OPERABLE RCS loop. This changes the CTS by moving the details of what constitutes an OPERABLE RCS loop to the Bases.	Bases	ITS 5.5.12	1
3.4.5 LA.2	3.4.1.2.b, 3.4.1.2.c, 3.4.1.2 Action b	CTS 3.4.1.2.b specifies requirements for RCS loops when the reactor trip breakers are in the open position or the control rod drive system is not capable of rod withdrawal. CTS 3.4.1.2.c specifies requirements for RCS loops when the reactor trip breakers are in the closed position and the control rod drive system is capable of rod withdrawal. With less than the number of operating RCS loops required by CTS LCO 3.4.1.2.c, CTS 3.4.1.2 Action b requires the restoration of the required RCS loops within 2 hours or to open the reactor trip breakers. ITS LCO 3.4.5.a specifies requirements for the RCS loops when the Rod Control System is capable of rod withdrawal. ITS LCO 3.4.5.b specifies requirements for the RCS loops when the Rod Control System is not capable of rod withdrawal. ITS 3.4.5 ACTION C requires the Rod Control System to be placed in a condition incapable of rod withdrawal when one required RCS loop is not in operation with the Rod Control System capable of rod withdrawal. ITS 3.4.5 ACTION D specifies the same Required Action (Required Action D.1). This changes the CTS by moving the details on how to place the Rod Control System in a state capable or incapable of rod withdrawal (i.e., by using the reactor trip breakers) from the Technical Specifications to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.5 LA.3	4.4.1.2.2	CTS 4.4.1.2.2 states that at least one required reactor coolant loop shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. ITS SR 3.4.5.1 states that the required reactor coolant loops shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the reactor coolant loops are circulating reactor coolant to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.6 LA.1	3.4.1.3	CTS 3.4.1.3 contains a description of what constitutes an OPERABLE reactor coolant loop and RHR loop. ITS 3.4.6 does not include this description of what constitutes an OPERABLE reactor coolant or RHR loop. This changes the CTS by moving the details of what constitutes an OPERABLE reactor coolant or RHR loop to the Bases.	Bases	ITS 5.5.12	1
3.4.6 LA.2	4.4.1.3.4	CTS 4.4.1.3.4 states that at least one coolant loop shall be verified to be in operation and "circulating reactor coolant" at least once per 12 hours. ITS SR 3.4.6.1 states that an RHR or RCS loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the coolant loop is circulating reactor coolant to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.7 LA.1	4.4.1.4.2	CTS 4.4.1.4.2 states that at least one RHR loop shall be determined to be in operation and "circulating reactor coolant" at least once per 12 hours. ITS SR 3.4.7.1 states that an RHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.8 LA.1	4.4.1.5	CTS 4.4.1.5 states that at least one RHR loop shall be determined to be in operation and "circulating reactor coolant" at least once per 12 hours. ITS SR 3.4.8.1 states that the required RHR loop shall be verified to be in operation every 12 hours. This changes the CTS by moving the requirement to verify that the RHR loop is circulating reactor coolant to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.10 LA.1	LCO 3.4.2, LCO 3.4.3	CTS LCO 3.4.2 and CTS LCO 3.4.3 are modified by a note that states that the pressurizer lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure. This information is not provided in ITS 3.4.10. This changes the CTS by moving this information to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.12 LA.1		Not Used.			
3.4.12 LA.2	4.4.9.3.1.e.2 (Unit 1), 4.4.9.3.1.d.2 (Unit 2)	CTS 4.4.9.3.1.e.2 (Unit 1) and 4.4.9.3.1.d.2 (Unit 2) require the performance of a CHANNEL FUNCTIONAL TEST and a CHANNEL CALIBRATION of the PORV emergency air tank pressure instrumentation. ITS 3.4.12 does not include this requirement. This changes the CTS by relocating these Surveillances to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	4

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.12 LA.3	3.5.3 Action c, 4.5.3.2, 3.1.2.3 Action b, 4.1.2.3.2	CTS LCO 3.5.3.a requires one centrifugal charging pump to be OPERABLE. However this requirement is modified by Footnote #, which specifies that a maximum of one centrifugal charging pump shall be OPERABLE and both safety injection pumps shall be inoperable. CTS 3.5.3 Action c provides the compensatory actions to be taken with more than one charging pump OPERABLE or with safety injection pump(s) OPERABLE. The requirement is to remove the additional charging pump(s) and the safety injection pump(s) motor circuit breakers from the electrical power circuit within 1 hour. CTS 4.5.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump, to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits. CTS LCO 3.1.2.3.a requires one charging pump in the boron injection flow path required by Specification 3.1.2.1 to be OPERABLE and CTS LCO 3.1.2.3.b requires one charging flow path associated with support of Unit 2 (Unit 1) and Unit 1 (Unit 2) shutdown functions to be available. LCO 3.1.2.3.b is modified by a footnote that states that a maximum of one centrifugal charging pump shall be OPERABLE whenever the temperature of one or more of the RCS cold legs is ≤ 152°F. CTS 4.1.2.3.2 requires all charging pumps and safety injection pumps, except the above required OPERABLE charging pump, to be demonstrated inoperable by verifying that the motor circuit breakers have been removed from their electrical power supply circuits. CTS 3.1.2.3 Action b provides the compensatory actions to be taken when more than one charging pump is OPERABLE or with one or more safety injection pumps OPERABLE. The requirement is to remove the additional charging pump(s) and the safety injection pump(s) motor circuit breakers from the electrical power circuit within 1 hour. ITS LCO 3.4.12.A requires a maximum of one charging pump capable of injecting into the RCS and both safety injection pumps not capable of injecting into the RCS. ITS 3.4.12 ACTION A covers the situation when one or more SI pumps are capable of injecting into the RCS. ITS 3.4.12 Required Action A.1 is to initiate action to verify all SI pumps are not capable of injecting into the RCS. ITS 3.4.12 ACTION B covers the situation when two charging pumps are capable of injecting into the RCS and only one charging pump is allowed to be capable of injecting into the RCS. ITS 3.4.12 Required Action B.1 is to initiate action to verify a maximum of one charging pump is capable of injecting into the RCS. ITS SR 3.4.12.1 requires the verification that all SI pumps are not capable of injecting into the RCS while SR 3.4.12.2 requires verification that no more than the maximum allowed number of charging pumps are capable of injecting into the RCS. This changes the CTS by relocating the detail on how to remove the safety injection and charging pumps from service (remove motor circuit breakers from the electrical power circuit) to the Bases and replacing them with the words "in a condition not capable of injecting into the RCS."	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.4 - Reactor Coolant System (RCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.4.14 LA.1	LCO 3.4.6.2.f, Table 3.4-0	CTS 3.4.6.2.f requires the leakage from each RCS PIV specified in Table 3.4-0 to be limited and CTS 4.4.6.2.2 requires the RCS PIVs in Table 3.4-0 to be periodically tested. CTS Table 3.4-0 contains a list of the RCS PIVs, their associated size, and their associated leakage limits. ITS 3.4.14 does not contain a list of the RCS PIVs or their size, and the leakage limits are located in SR 3.4.14.1. This changes the CTS by relocating the list of PIVs, including their associated size, to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	1
3.4.14 LA.2	Table 3.4-0	CTS Table 3.4-0 specifies the minimum test differential pressure for the RCS PIVs to not be below 150 psid. ITS 3.4.14 does not specify this limit. This changes the CTS by relocating the minimum test differential pressure to the ITS Bases.	Bases	ITS 5.5.12	3
3.4.16 LA.1	Table 4.4-4 Items 2 and 4	CTS Table 4.4-4, Item 2 requires an isotopic analysis to determine whether DOSE EQUIVALENT I-131 concentration is within limit. CTS Table 4.4-4, Item 4 requires an isotopic analysis for iodine including I-131, I-133, and I-135. ITS SR 3.4.16.2 requires the verification that reactor coolant DOES EQUIVALENT I-131 specific activity is within limit. ITS 3.4.16 Required Action A.1 requires the verification that DOSE EQUIVALENT I-131 is within the acceptable region. This changes the CTS by moving the detail that an isotopic analysis must be performed to satisfy the requirements of the Surveillances to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.2 LA.1	LCO 3.5.2, 4.5.2.e.2, 4.5.2.f	CTS LCO 3.5.2 states that two independent ECCS subsystems shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. CTS 4.5.2.e.2 and 4.5.2.f also list the pumps that are included in an OPERABLE subsystem and are required to be tested. ITS 3.5.2 requires two ECCS trains to be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the ITS Bases. ITS SR 3.5.2.3 and SR 3.5.2.5 also do not list the pumps that comprise an ECCS train since this information has been moved to the Bases, but require only that each ECCS pump be tested. This changes the CTS by moving the details of what constitutes an OPERABLE subsystem to the ITS Bases.	Bases	ITS 5.5.12	1
3.5.2 LA.2	4.5.2.a footnote *	CTS 4.5.2.a, which requires verification of the position of certain ECCS valves, includes a footnote (footnote *) that states that positions of certain ECCS valves must be changed during the switchover from injection to recirculation flow following a LOCA. ITS SR 3.5.2.1, which requires the same valve position verification, does not include this extra information. This changes the CTS by removing the description that certain valves must change position to the UFSAR.	UFSAR	10 CFR 50.59	2
3.5.2 LA.3	4.5.2.c	CTS 4.5.2.c requires a visual inspection for loose debris in containment prior to establishing containment integrity and within affected areas of the containment at the completion of each containment entry when containment integrity is established. The ITS does not include this requirement. This changes the CTS by moving this requirement to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
3.5.2 LA.4	4.5.2.e.1, 4.5.2.e.2	CTS 4.5.2.e.1 and 4.5.2.e.2 require verification of the automatic actuation of ECCS components on a "Safety Injection" test signal and “Safety Injection” signal, respectively. ITS SR 3.5.2.4 and SR 3.5.2.5 do not state the specific type of signal, but only specify an "actual or simulated actuation" signal. This changes CTS by moving the type of actuation signal (i.e., Safety Injection) to the Bases. The change to replace “test” with “simulated” and allow both “actual or simulated actuation” signals to be used for these SRs is discussed in DOC L.6.	Bases	ITS 5.5.12	1
3.5.2 LA.5	4.5.2.g.2	CTS 4.5.2.g.2, which requires verification of the position of certain ECCS throttle valves, includes information concerning the flow path they throttle (i.e., boron injection or safety injection). ITS SR 3.5.2.6, which requires the same valve position verification, does not include this extra information. This changes the CTS by moving the flow path description to the UFSAR.	UFSAR	10 CFR 50.59	1

Table LA - Removed Details
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.5.3 LA.1	LCO 3.5.3, 3.5.3 Actions a and b	CTS LCO 3.5.3 states that an ECCS subsystem shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem. ITS 3.5.3 requires an ECCS train be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the ITS Bases. CTS 3.5.3 Action a provides an action for when a ECCS subsystem is inoperable "because of the inoperability of either the centrifugal charging pump or the flow path from the refueling water storage tank" and CTS 3.5.3 Action b provides an action for when an ECCS subsystem is inoperable "because of the inoperability of either the residual heat removal heat exchanger or residual heat removal pump." ITS 3.5.3 ACTION A uses the term "residual heat removal (RHR) subsystem" and ITS 3.5.3 ACTION B uses the term "centrifugal charging subsystem" instead of stating the reasons the subsystem is inoperable, and the reasons listed in the CTS are moved to the ITS Bases.	Bases	ITS 5.5.12	1
3.5.5 LA.1	LCO 3.4.6.2.e Applicability footnote *, 4.4.6.2.1.c	CTS 3.4.6.2.e Applicability Footnote * states that Specification 3.4.6.2.e is applicable with "average" pressure within 20 psi of the nominal full pressure value. CTS 4.4.6.2.1.c states that the seal line resistance shall be determined when the "average" pressurizer pressure is within 20 psi of its nominal full pressure value. ITS SR 3.5.5.1 Note states that the Surveillance is not required to be performed until 4 hours after the pressurizer pressure stabilizes at ≥ 2065 psig and ≤ 2105 psig (Unit 1) and ≥ 2215 psig and ≤ 2255 psig (Unit 2). This changes the CTS by relocating the detail that the pressurizer pressure is an averaged value to the ITS Bases.	Bases	ITS 5.5.12	3
3.5.5 LA.2	4.4.6.2.1.c	CTS 4.4.6.2.1.c provides a detailed formula to determine the actual seal line resistance. ITS SR 3.5.5.1 does not include this detailed formula. This changes the CTS by relocating the detailed formula of how to determine seal line resistance to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.1 LA.1	1.8	CTS 1.8 states "CONTAINMENT INTEGRITY shall exist when: 1.8.1 All penetrations required to be closed during accident conditions are either: a. Capable of being closed by an OPERABLE containment automatic isolation valve system, or b. Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1; 1.8.2 All equipment hatches are closed and sealed; and (Unit 2 only) 1.8.5 The sealing mechanism associated with each penetration (e.g., welds, bellows or O-rings) is OPERABLE." ITS 3.6.1 states "Containment shall be OPERABLE." This changes the CTS by moving the reference to penetration and equipment hatch requirements to the Bases. The change deleting the phrase "and sealed" in CTS 1.8.2 is addressed by DOC L.2.	Bases	ITS 5.5.12	2
3.6.2 LA.1	LCO 3.6.1.3.a	CTS LCO 3.6.1.3.a states (in part) what constitutes an OPERABLE containment air lock. ITS LCO 3.6.2 does not include this level of detail. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the ITS Bases.	Bases	ITS 5.5.12	1
3.6.3 LA.1	4.6.3.1.2	CTS 4.6.3.1.2 states that each containment isolation valve shall be demonstrated OPERABLE by verifying that on a "Phase A," “Phase B," or "Containment Purge and Exhaust" isolation signal, each "Phase A," "Phase B," and "Containment Purge and Exhaust" isolation valve, respectively, actuates to its isolation position. ITS SR 3.6.3.5 requires verification that each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal. This changes the CTS by moving the detail concerning what type of signals are used to conduct the Surveillance Requirement to the ITS Bases. Changes associated with not requiring the Surveillance Requirement be conducted on valves locked, sealed, or otherwise secured in position are addressed by DOC L.6.	Bases	ITS 5.5.12	1
3.6.5 LA.1	4.6.1.5.1, 4.6.1.5.2	CTS 4.6.1.5.1 and CTS 4.6.1.5.2 include specific locations where containment temperatures are to be measured and the method of determining the average temperatures. ITS SR 3.6.5.1 and ITS SR 3.6.5.2 do not include these details. This changes the CTS by moving the description of how compliance with the Technical Specification LCO is determined to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.6 LA.1	LCO 3.6.2.1	CTS 3.6.2.1 states that two "independent" Containment Spray Systems shall be OPERABLE "with each spray system capable of taking suction from the RWST and transferring suction to the containment sump." ITS 3.6.6 requires two containment spray trains (i.e., systems) to be OPERABLE, but does not include the details of what constitutes OPERABILITY. This changes the CTS by moving the detail that the trains must be "independent" and the description of the capability of the trains (i.e., taking suction from the RWST and transferring suction to the containment sump) to the ITS Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.6 LA.2	4.6.2.1.c.1, 4.6.2.1.c.2	CTS 4.6.2.1.c.1 and CTS 4.6.2.1.c.2 require verification of the automatic actuation of containment spray components on a Containment Pressure - High-High signal. ITS SR 3.6.6.3 and SR 3.6.6.4 do not specify the name of the signal, but only specify an actuation signal. This changes the CTS by moving the detail concerning what type of signal is used to conduct the Surveillance Requirements to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.6 LA.3	4.6.2.1.d	CTS 4.6.2.1.d states to perform "an air or smoke flow test through each spray header" to verify each spray nozzle is unobstructed. ITS SR 3.6.6.5 states to verify each spray nozzle is unobstructed. This changes the CTS by moving the details of how to perform the test to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.7 LA.1	LCO 3.6.2.2.b	CTS 3.6.2.2.b states that, as part of the Spray Additive System, two spray additive eductors each capable of adding NaOH solution from the chemical additive tank to a containment spray system pump flow are required. ITS 3.6.7 states that the Spray Additive System shall be OPERABLE, but the details of what constitutes an OPERABLE system are moved to the Bases. This changes the CTS by moving the details of what constitutes a Spray Additive System to the ITS Bases.	Bases	ITS 5.5.12	1
3.6.7 LA.2	4.6.2.2.b.2	CTS 4.6.2.2.b.2 requires the verification of the concentration of the NaOH solution "by chemical analysis." ITS SR 3.6.7.3 also requires verification of the concentration of NaOH solution, but does not include the method to perform the verification. This changes the CTS by moving the specific method (by chemical analysis) to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.7 LA.3	4.6.2.2.c	CTS 4.6.2.2.c requires verification that each automatic spray additive valve in the flow path actuates to its correct position on a Containment Pressure - High-High signal. ITS SR 3.6.7.4 does not specify the signal, but only specifies an actual or simulated actuation signal. This changes the CTS by moving the type of actuation signal to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.7 LA.4	4.6.2.2.d	CTS 4.6.2.2.d specifies that the spray additive flow test is accomplished by verifying flow rate from the spray additive tank test line to each Containment Spray System (i.e., train) with the spray pump operating on recirculation. ITS SR 3.6.7.5 states "Verify spray additive flow rate from each solution's flow path." This changes the CTS by moving the details regarding the test method to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.8 LA.1	LCO 3.6.4.2	CTS 3.6.4.2 states that two "independent" containment hydrogen recombiner systems shall be OPERABLE. ITS 3.6.8 also states that two hydrogen recombiners shall be OPERABLE, but does not specify that the hydrogen recombiners are "independent." This changes the CTS by moving the detail that the hydrogen recombiners are "independent" to the ITS Bases.	Bases	ITS 5.5.12	1
3.6.8 LA.2	4.6.4.2.a, 4.6.4.2.b.2, 4.6.4.2.b.3, 4.6.4.2.b.4	CTS 4.6.4.2.a, CTS 4.6.4.2.b.2, CTS 4.6.4.2.b.3, and CTS 4.6.4.2.b.4 include details for performance of functional tests, a resistance to ground test, and a visual examination. ITS SR 3.6.8.1, ITS SR 3.6.8.2, and ITS SR 3.6.8.3 together require that each of these three types of tests be performed. This changes CTS by moving the detail of how these tests are performed to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.9 LA.1	4.6.4.3.a	CTS 4.6.4.3.a requires the energization of the supply breakers to each train of the Distributed Ignition System (DIS) and the verification that at least 34 of 35 ignitors are energized. ITS SR 3.6.9.1 does not specify the total numbers of ignitors (i.e., 35). This changes the CTS by moving details of the total number of ignitors to the ITS Bases.	Bases	ITS 5.5.12	1
3.6.10 LA.1	LCO 3.6.5.6	CTS 3.6.5.6 requires two "independent" containment air recirculation systems (referred to as the Containment Air Recirculation/Hydrogen Skimmer (CEQ) System in the ITS) to be OPERABLE. ITS 3.6.10 requires two Containment Air Recirculation/Hydrogen Skimmer (CEQ) trains to be OPERABLE, but does not specify that the trains are "independent." This changes the CTS by moving the detail that the trains are "independent" to the ITS Bases.	Bases	ITS 5.5.12	1
3.6.10 LA.2	4.6.5.6.a	CTS 4.6.5.6.a requires verification that the motor operated valve in the suction line to the containment's lower compartment opens "when the return air fan starts." ITS SR 3.6.10.4 requires verification that the motor operated valve in the suction line to the containment lower compartment opens on an "actual" or simulated actuation signal. ITS SR 3.6.10.4 does not specify the name of the actual signal, but specifies an actual actuation signal. This changes the CTS by moving the type of actuation signal to the Bases. The change to allow a simulated signal is discussed in DOC L.2.	Bases	ITS 5.5.12	3
3.6.11 LA.1	LCO 3.6.5.1.a, 4.6.5.1.b.1	CTS 3.6.5.1.a and 4.6.5.1.b.1 specify that the boron being used to meet the lower limit for stored ice boron concentration is in the form of sodium tetraborate and that the pH limit is normalized to 25°C. ITS SR 3.6.11.6 specifies an upper and lower limit (≥ 1800 ppm and ≤ 2300 ppm) for stored boron concentration, but does not include the form of the boron (i.e., sodium tetraborate). ITS SR 3.6.11.6 also specifies the pH limit, but does not state that it is normalized to 25°C. This changes the CTS by moving the details that the boron must be in the form of sodium tetraborate and that the pH is normalized to 25°C to the ITS Bases. The addition of the boron concentration upper limit is discussed in DOC M.1.	Bases	ITS 5.5.12	1
3.6.11 LA.2	4.6.5.1.a	CTS 4.6.5.1.a requires the verification that the maximum ice bed temperature is ≤ 27°F using the ice bed temperature monitoring system. ITS SR 3.6.11.1 requires the verification that the maximum ice bed temperature is ≤ 27°F. This changes the CTS by moving the detail concerning the system to be used to evaluate whether the ice bed temperature is ≤ 27°F to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.12 LA.1	4.6.5.3.1.a	CTS 4.6.5.3.1.a requires the inlet doors to be verified closed "by the inlet door position monitoring system." ITS SR 3.6.12.1 requires the same verification, however the detail on the method to perform the verification is not specified. This changes the CTS by moving the detail on the method to verify the inlet doors are closed to the ITS Bases.	Bases	ITS 5.5.12	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.6.12 LA.2	4.6.5.3.1.b.3, 4.6.5.3.1.b.4, 4.6.5.3.1.b.5	CTS 4.6.5.3.1.b.3 requires testing of each one of the inlet doors and verifying that the torque required to open each door is less than 195 inch-pounds when the door is 40 degrees open. This torque is defined as the "door opening torque" and is equal to the nominal door torque plus a frictional torque component. CTS 4.6.5.3.1.b.4 requires testing of each one of the inlet doors and verifying that the torque required to keep each door from closing is greater than 78 inch-pounds when the door is 40 degrees open. This torque is defined as the "door closing torque" and is equal to the nominal door torque plus a frictional torque component. CTS 4.6.5.3.1.b.5 requires a calculation of the frictional torque of each door tested in accordance with 3 and 4, above. The calculated frictional torque shall be less than or equal to 40 inch-pounds. ITS SR 3.6.12.6 requires the performance of a torque test on each inlet door. This changes the CTS by moving the torque design limits and definitions to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.12 LA.3	4.6.5.3.2.b	CTS 4.6.5.3.2.b requires an inspection of each ice condenser intermediate deck door by visually verifying no structural deterioration, by verifying free movement of the vent assemblies, and by ascertaining free movement when lifted with the applicable force shown. CTS 4.6.5.3.2.b also lists the required lifting force for various doors. ITS SR 3.6.12.7 requires the same inspections, however the locations of the doors and associated lifting forces are not listed. This changes the CTS by moving the locations of the doors and associated lifting forces to the ITS Bases.	Bases	ITS 5.5.12	3
3.6.13 LA.1	Table 3.6-2	CTS Table 3.6-2 specifies the divider seal acceptable physical properties. The table includes the tensile strength and elongation property as well as the material type. The material must be Uniroyal 3807 or equal, defined as meeting at least the requirements discussed in Question 5.98 of the Plant's FSAR. ITS SR 3.6.13.4 only includes the tensile strength and elongation property requirements. This changes the CTS by moving the material type to the UFSAR.	UFSAR	10 CFR 50.59	1
3.6.14 LA.1	4.6.5.7.d (Unit 1 only)	CTS 4.6.5.7.d requires the verification that the 12 inch drain line from the ice condenser floor to the containment lower compartment is unrestricted. ITS SR 3.6.14.3 requires the verification that the drain line from the ice condenser floor to the lower compartment is unrestricted. This changes the Unit 1 CTS by moving the reference to the pipe size (12 inches) to the UFSAR.	UFSAR	10 CFR 50.59	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.1 LA.1	Table 4.7-1 orifice size detail	CTS Table 4.7-1 specifies the MSSV number and associated lift settings and orifice size for each MSSV. ITS Table 3.7.1-2 only provides the MSSV number and associated lift setting. This changes the CTS by deleting the required orifice size and relocating this detail to the UFSAR.	UFSAR	10 CFR 50.59	1
3.7.1 LA.2	Table 4.7-1 footnote *	CTS 3.7.1.1 Table 4.7-1 is modified by footnote * that states, "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure." ITS 3.7.1 does not contain this information. This changes the CTS by moving details on setting the lift pressure to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.5 LA.1	LCO 3.7.1.2.a, 3.7.1.2 Actions a, b, and c	CTS LCO 3.7.1.2.a requires three “independent” steam generator AFW “pumps and associated flow paths” to be OPERABLE. This includes two motor driven AFW pumps powered from separate emergency buses, and the steam turbine driven AFW pump capable of being powered from an OPERABLE steam supply system. ITS LCO 3.7.5 states “Three AFW trains shall be OPERABLE.” The ITS does not include design details or define the components and associated flow paths that comprise an OPERABLE AFW train. CTS 3.7.1.2.a Actions a, b, and c cover the inoperabilities associated with the auxiliary feedwater pump(s). ITS 3.7.5 ACTIONS B, C, and D cover the inoperabilities of the train(s) which includes both the pump and the associated flow path. This changes the CTS by moving the description of the AFW System to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.5 LA.2	4.7.1.2.e, 3.7.1.2.f	CTS 4.7.1.2.e and CTS 4.7.1.2.f require the AFW automatic valves and pumps, respectively, to be actuated by an engineered safety feature actuation test signal required by Specification 3/4.3.2. ITS SR 3.7.5.3 and SR 3.5.7.4 require the same tests to be actuated by an actual or simulated actuation signal. This changes the CTS by moving the detail of which signals actuate the pumps and valves to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.6 LA.1	3.7.1.3 Action b, 4.7.1.3.2	CTS 3.7.1.3 Action b requires the Essential Service Water System (ESWS) to be demonstrated as a backup supply to the auxiliary feedwater pumps. CTS 4.7.1.3.2 specifies that the ESWS shall be demonstrated OPERABLE at least once per 12 hours by verifying that the ESWS is in operation whenever the ESWS is the supply source for the auxiliary feedwater pumps. ITS 3.7.6 Required Action A.1 requires the verification of OPERABILITY of a backup water supply. This changes the CTS by moving the detail that the ESWS provides the backup supply for the auxiliary feedwater pumps from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.6 LA.2	4.7.1.3.2	CTS 4.7.1.3.2 specifies that the Essential Service Water System (ESWS) shall be demonstrated OPERABLE at least once per 12 hours by verifying that the ESWS is in operation whenever the ESWS is the supply source for the auxiliary feedwater pumps. ITS 3.7.6 Required Action A.1 requires the verification of OPERABILITY of a backup water supply. This changes the CTS by moving the method used to demonstrate the ESWS is the backup supply source for the auxiliary feedwater pumps from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.7 - Plant Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.7 LA.1	LCO 3.7.3.1.a	CTS 3.7.3.1.a states that two "independent" CCW loops shall be OPERABLE. ITS 3.7.7 requires two CCW trains to be OPERABLE, but does not contain the detail that the trains must be independent. This changes the CTS by moving the detail that the CCW trains are independent to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.7 LA.2	4.7.3.1.b	CTS 4.7.3.1.b requires verification that each CCW automatic valve actuates to its correct position on a "Safety Injection" signal. ITS SR 3.7.7.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by moving the specific type of actuation signal to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.7 LA.3	4.7.3.1.c	CTS 4.7.3.1.c requires each CCW pump to be tested in accordance with Specification 4.0.5. ITS 3.7.7 does not contain the specific Surveillance to test each CCW pump in accordance with the Inservice Testing (IST) Program. ITS 5.5.6, "Inservice Testing Program," provides controls for IST of ASME Code Class 1, 2, and 3 components. This changes the CTS by removing a detailed listing of the components required to be tested in accordance with the IST Program.	IST Program	10 CFR 50.55a	3
3.7.8 LA.1	LCO 3.7.4.1.a	CTS 3.7.4.1.a states that two "independent" ESW loops shall be OPERABLE. ITS 3.7.8 requires two ESW trains to be OPERABLE, but does not contain detail that the trains must be independent. This changes the CTS by moving the detail that the ESW trains are independent to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.8 LA.2	4.7.4.1.b	CTS 4.7.4.1.b requires verification that each ESW automatic valve actuates to its correct position on a "Safety Injection" signal. ITS SR 3.7.8.2 requires verification that each automatic valve actuates to its correct position on an actual or simulated actuation signal. This changes the CTS by moving the specific type of actuation signal to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.8 LA.3	4.7.4.1.c	CTS 4.7.4.1.c requires each ESW pump to be tested in accordance with Specification 4.0.5. ITS 3.7.8 does not contain the specific Surveillance to test each ESW pump in accordance with the IST Program. ITS 5.5.6, "Inservice Testing Program," provides controls for IST of ASME Code Class 1, 2, and 3 components. This changes the CTS by removing a detailed listing of the components required to be tested in accordance with the IST Program.	IST Program	10 CFR 50.55a	3
3.7.10 LA.1	LCO 3.7.5.1	CTS 3.7.5.1 states that the CREV System shall be OPERABLE with two independent pressurization trains and one charcoal adsorber/HEPA filter unit. ITS LCO 3.7.10 states that two CREV trains shall be OPERABLE, but the details of what constitutes an OPERABLE CREV train are moved to the Bases. This changes the CTS by removing details of what constitutes an OPERABLE train to the ITS Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.10 LA.2	3.7.5.1 Action e	CTS 3.7.5.1 Action e requires, during movement of irradiated fuel assemblies, the immediate suspension of all operations involving the movement of irradiated fuel assemblies when both pressurization trains are inoperable, the filter unit is inoperable, or the control room envelope/pressure boundary is inoperable. ITS 3.7.10 ACTION F requires the same action; however, entry into the Condition is for when two CREV trains are inoperable during the movement of recently irradiated fuel assemblies. This changes the CTS by relocating the details of what conditions make two CREV trains inoperable to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.10 LA.3	4.7.5.1.b	CTS 4.7.5.1.b states that each Control Room Emergency Ventilation System shall be demonstrated OPERABLE by "initiating flow through the HEPA filter and charcoal adsorber train" and verifying that the train operates for at least 15 minutes. ITS SR 3.7.10.1 states to operate each CREV train for ≥ 15 minutes. This changes the CTS by moving the detail of the flow path from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.10 LA.4	4.7.5.1.e.2.a, 4.7.5.1.e.2.b	CTS 4.7.5.1.e.2.a requires verification that on a Safety Injection Signal (SIS) from the associated unit, the system automatically operates in the pressurization/cleanup mode. CTS 4.7.5.1.e.2.b requires verification that on a SIS from the other unit, the system automatically operates in the pressurization/cleanup mode. ITS SR 3.7.10.3 requires the verification that each CREV train actuates on an actual or simulated actuation signal. This changes the CTS by relocating the details that the test must be performed using a SIS from the associated unit and from the other unit, and that the system must actuate automatically in the pressurization/cleanup mode, to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.10 LA.5	4.7.5.1.e.3	CTS 4.7.5.1.e.3 requires the verification that the system maintains the control room envelope/pressure boundary at a positive pressure of greater than or equal to 1/16 inch W.G. relative to the outside atmosphere at a system flow rate of 6000 cfm plus or minus 10% with a makeup air flow rate ≤ 1000 cfm. ITS SR 3.7.10.4 requires the verification that each CREV train can maintain a positive pressure of ≥ 0.0625 inches water gauge, relative to the outside atmosphere during the pressurization/cleanup mode of operation at a makeup flow rate of ≤ 1000 cfm. This changes the CTS by relocating the details of the required system flow to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.11 LA.1	LCO 3.7.5.2	CTS LCO 3.7.5.2 states that the CRAC System shall be OPERABLE with two heating and cooling systems. ITS LCO 3.7.11 states that two CRAC trains shall be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases. This changes the CTS by removing details of what constitutes an OPERABLE system to the ITS Bases. The deletion of the heating system requirement is discussed in DOC L.1.	Bases	ITS 5.5.12	1
3.7.12 LA.1	LCO 3.7.6.1	CTS 3.7.6.1 states that two "independent" ESF ventilation system exhaust air filter trains shall be OPERABLE. ITS LCO 3.7.12 states that two ESF Ventilation trains shall be OPERABLE. This changes the CTS by removing details that the trains are "independent" from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.7.12 LA.2	4.7.6.1.a	CTS 4.7.6.1.a states that each ESF ventilation system exhaust air filter train shall be demonstrated OPERABLE by "initiating, from the control room, flow through the HEPA filter and charcoal adsorber train" and verifying that the train operates for at least 15 minutes. ITS 3.7.12.2 states "Operate each ESF Ventilation System train for ≥ 15 minutes." This changes the CTS by moving the requirement to actuate the train from the control room and the detail of the flow path from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.12 LA.3	4.7.6.1.d.3	CTS 4.7.6.1.d.3 requires verification that the standby fan starts automatically on a Containment Pressure - High- High signal and directs exhaust flow through the HEPA filters and charcoal adsorber banks on the same signal. ITS SR 3.7.12.3 requires verification that each ESF Ventilation train actuates on an actual or simulated actuation signal. This changes the CTS by moving the detail regarding the specific signal used and the flow path from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.7.13 LA.1	4.9.12.a, 4.9.12.d.3	CTS 4.9.12.a states that the required FHAEV System shall be demonstrated OPERABLE by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes. CTS 4.9.12.d.3 requires, in part, the verification that on a high-radiation signal the system automatically shuts down the storage pool ventilation system supply fans. ITS SR 3.7.13.2 states to operate the required FHAEV train for ≥ 15 minutes. ITS SR 3.7.13.4 requires the verification that the required FHAEV train actuates on an actual or simulated actuation signal. This changes the CTS by moving the details of how the Surveillances are conducted to the ITS Bases. Other changes to CTS 4.9.12.d.3 are discussed in DOCs M.1 and L.4.	Bases	ITS 5.5.12	3
3.7.13 LA.2	3/4.9.12 footnote **	CTS 3/4.9.12 footnote ** states that the FHAEV System is a shared system. ITS 3.7.13 does not include this detail. This changes the CTS by relocating this detail to the UFSAR.	UFSAR	10 CFR 50.59	1
3.7.14 LA.1	3/4.9.11 footnote * (Unit 2 only)	CTS 3/4.9.11 footnote * states that the fuel storage pool is a shared system with Unit 1. ITS 3.7.14 does not include this detail. This changes the Unit 2 CTS by relocating this detail to the UFSAR.	UFSAR	10 CFR 50.59	1
3.7.15 LA.1	3/4.9.15 footnote *	CTS 3/4.9.15 footnote * states that the fuel storage pool is a shared system. ITS 3.7.15 does not include this detail. This changes the CTS by moving this detail from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.7.17 LA.1	Table 4.7-2 Item 2	CTS Table 4.7-2, Item 2 requires an isotopic analysis to determine whether DOSE EQUIVALENT I-131 concentration is within limit. ITS SR 3.7.17.1 requires the verification that specific activity of the secondary coolant is within limit. This changes the CTS by moving the detail that an isotopic analysis must be performed to satisfy the requirements of the Surveillance to the ITS Bases.	Bases	ITS 5.5.12	3

Table LA - Removed Details
ITS Section 3.7 - Plant Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3/4.7.8 (Unit 1) and 3/4.7.7 (Unit 2) LA.1	3/4.7.8 (Unit 1), 3/4.7.7 (Unit 2)	CTS LCO 3.7.8.1 (Unit 1) and CTS 3.7.7.1 (Unit 2) require all safety related snubbers to be OPERABLE. ITS 3.7 does not include the requirements for inspection and testing of safety related snubbers. This changes the CTS by moving the explicit snubber requirements from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6

Table LA - Removed Details
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.1 LA.1	LCO 3.8.1.1.a and b, 4.8.1.1.2.a.3	CTS LCO 3.8.1.1.a requires two "physically independent" circuits between the offsite transmission network and the onsite Class 1E distribution system to be OPERABLE. CTS LCO 3.8.1.1.b requires two "separate and independent" DGs to be OPERABLE, each with a "separate" day fuel tank and a "separate fuel transfer pump." CTS 4.8.1.1.2.a.3 requires the verification that the fuel transfer "pump" can be started and that it transfers fuel from the storage system to the day tank. ITS LCO 3.8.1 requires two qualified circuits between the offsite transmission network and the onsite Class 1E distribution system and two DGs capable of supplying the onsite Class 1E power distribution subsystem(s) to be OPERABLE. ITS SR 3.8.1.4 requires verification that each day tank contains ≥ 101.4 gallons of fuel oil. ITS SR 3.8.1.7 requires verification that the fuel oil transfer system operates automatically to transfer fuel oil from the storage tank to the day tank. This changes the CTS by moving the details that the offsite circuits are "physically independent," that the DGs are "separate and independent," that the day tanks are "separate," and that each OPERABLE DG has "a separate fuel transfer pump" from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.1 LA.2	4.8.1.1.2.a.6	CTS 4.8.1.1.2.a.6 requires the verification that each DG is aligned to provide standby power to the associated emergency buses. ITS 3.8.1 SRs do not contain this requirement. This changes the CTS by moving the detail that each DG is aligned to provide standby power to the associated emergency buses from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.1 LA.3	4.8.1.1.2.e.1	CTS 4.8.1.1.2.e.1 requires each DG to be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service. The ITS does not include this DG inspection requirement. This changes the CTS by moving the explicit DG inspection Surveillance from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6
3.8.1 LA.4	4.8.1.1.2.e.2	CTS 4.8.1.1.2.e.2 requires verification of the DG performance during a load rejection of greater than or equal to 600 kW. ITS SR 3.8.1.10 requires verification of the DG performance during a load rejection greater than or equal to the single largest post-accident load. This changes the CTS by moving the detail of the actual load value (600 kW) from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.1 LA.5	4.8.1.1.2.a.4 footnote *	CTS 4.8.1.1.2.a.4 footnote * states that all engine starts for the purpose of this surveillance testing and compensatory action may be at reduced acceleration rates as recommended by the manufacturer "so that mechanical stress and wear on the DG are minimized." Note 2 to ITS SR 3.8.1.2 states that a modified DG start involving gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. This changes the CTS by moving the detail that mechanical stress and wear on the DG are minimized from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.2 LA.1	LCO 3.8.1.2.b	CTS LCO 3.8.1.2.b specifies that a DG be OPERABLE with a fuel transfer pump. ITS LCO 3.8.2.b requires an OPERABLE DG capable of supplying one train of the onsite Class 1E power distribution subsystem(s). This changes the CTS by moving the details that an OPERABLE DG requires "a fuel transfer pump" from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.3 LA.1	LCO 3.8.1.1.b.2 (including footnote *)	CTS LCO 3.8.1.1.b.2 requires a "separate" fuel storage system for each required DG. CTS 3.8.1.1.b.2 footnote * states that the tanks are "separate between diesels but shared between Units 1 and 2." ITS 3.8.3 does not state that the fuel oil storage tanks are separate between diesels, or that they are shared between Units 1 and 2. This changes the CTS by moving these details to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.3 LA.2	4.8.1.1.2.f.1, 4.8.1.1.2.f.2	CTS 4.8.1.1.2.f.1 requires a cleaning of the fuel oil storage tanks by one of two methods every 10 years. CTS 4.8.1.1.2.f.2 requires the performance of a precision leak detection test to verify that the leakage rate from the fuel oil system is ≤ .05 gallons/hour. ITS 3.8.3 does not include these requirements for the fuel oil storage tanks. This changes the CTS by moving these fuel oil storage tank requirements from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6
3.8.4 LA.1	LCO 3.8.2.3, LCO 3.8.2.5	CTS 3.8.2.3 states that DC bus trains AB and CD shall be energized and OPERABLE with tie breakers between bus trains open. The details of what constitutes Train AB and Train CD are also listed. Train AB consists of 250 VDC bus AB, 250 VDC battery bank No. 1AB (Unit 1) and 2AB (Unit 2), and a full capacity charger. Train CD consists of 250 VDC bus CD, 250 VDC battery bank No. 1CD (Unit 1) and 2CD (Unit 2), and a full capacity charger. CTS 3.8.2.5 states that DC bus Train N shall be energized and OPERABLE. The details of what constitutes the N train are also listed. Train N consists of the 250 VDC bus N, 250 VDC battery bank N, and a full capacity charger. ITS LCO 3.8.4 requires the DC electrical power subsystems to be OPERABLE, which include the Train A and Train B 250 VDC electrical power subsystems (LCO 3.8.4.a), and the Train N 250 VDC electrical power subsystem (LCO 3.8.4.b). This changes the CTS by moving the details of the components of the DC Sources (battery and charger) from the CTS to the ITS Bases. The 250 VDC buses are part of the Distribution System Specification (ITS 3.8.9) and all aspects of the buses are addressed in ITS 3.8.9.	Bases	ITS 5.5.12	1

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.4 LA.2	4.8.2.3.2.d, 4.8.2.5.2.d	CTS 4.8.2.3.2.d requires the performance of a battery service test on the Train A and Train B batteries. CTS 4.8.2.5.2.d requires the performance of a battery service test on the Train N battery. Each of these Surveillance Requirements specifies that the battery charger must be disconnected throughout the test. ITS SR 3.8.4.3 requires the verification that the battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. This changes the CTS by moving details concerning the status of the battery charger (disconnected throughout the test) from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.8.5 LA.1	LCO 3.8.2.4	CTS LCO 3.8.2.4 requires one "250 VDC battery bank and charger" associated with the specified 250 VDC bus to be OPERABLE. ITS LCO 3.8.5 requires one Train A or Train B 250 VDC electrical power subsystem to be OPERABLE to support one train of the DC Electrical Power Distribution System required by LCO 3.8.10, "Distribution Systems - Shutdown." This changes the CTS by moving the details of what constitutes the required Train A or Train B 250 VDC electrical power subsystem to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.6 LA.1	4.8.2.3.2.e, 4.8.2.5.2.e	CTS 4.8.2.3.2.e and CTS 4.8.2.5.2.e require the performance of a battery performance test. The Surveillance requires a more frequent performance if the battery shows signs of "degradation" or has reached 85% of the service life expected for the application. The CTS further states that degradation is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating. ITS SR 3.8.6.6 requires verification of the battery capacity when subjected to a performance discharge test or a modified performance discharge test. The Surveillance is also required more frequently when the battery shows degradation or has reached 85% of the expected life, but the definition of what constitutes "degradation" is not included. This changes the CTS by moving the detail on how degradation is determined from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1
3.8.7 LA.1	LCO 3.8.2.1 footnote *	CTS LCO 3.8.2.1 footnote * states that each 120 VAC vital bus must be energized from its associated inverter connected to a DC bus. ITS LCO 3.8.7 requires the Train A and Train B inverters to be OPERABLE. This changes the CTS by moving the procedural detail that the inverters must be "connected to a DC bus" and that they must be energizing the associated 120 VAC vital buses from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.8 LA.1	LCO 3.8.2.2 footnote *	CTS LCO 3.8.2.2 footnote * states that each required 120 VAC vital bus must be energized from its associated inverter connected to a DC bus. ITS LCO 3.8.8 requires two inverters to be OPERABLE to support one train of the 120 VAC vital electrical distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown." This changes the CTS by moving the procedural detail that the inverters must be "connected to a DC bus" and that they must be energizing the associated 120 VAC vital buses from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.8.9 LA.1	LCO 3.8.2.1, 4.8.2.1, LCO 3.8.2.3, 4.8.2.3.1, LCO 3.8.2.5, 4.8.2.5.1	CTS LCO 3.8.2.1 requires the AC electrical buses to be OPERABLE "and energized with tie breakers open between redundant busses." CTS 4.8.2.1 also requires the AC buses to be determined OPERABLE "and energized from AC sources with tie breakers open between redundant busses" by verifying correct breaker alignment and indicated power availability. CTS LCO 3.8.2.3 requires the DC bus trains to be "energized" and OPERABLE "with tie breakers between bus trains open." CTS 4.8.2.3.1 requires the DC bus trains to be determined OPERABLE "and energized with tie breakers between bus trains open" by verifying correct breaker alignment and indicated power availability. CTS 3.8.2.5 requires the Train N bus to be "energized" and OPERABLE. CTS 4.8.2.5.1 also requires the Train N bus to be OPERABLE and "energized" by verifying correct breaker alignment and indicated power availability. ITS LCO 3.8.9 requires the applicable electrical power distribution subsystems to be OPERABLE and ITS SR 3.8.9.1 requires the verification of correct breaker alignments and voltage to required AC, DC, and 120 VAC vital bus electrical power distribution subsystems. This changes the CTS by moving the procedural detail that the buses must be energized with tie breakers open between redundant buses from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.8.9 LA.2	LCO 3.8.2.1, LCO 3.8.2.3, LCO 3.8.2.5	CTS LCO 3.8.2.1 requires the AC electrical buses to be OPERABLE and lists the specific AC and 120 VAC vital buses, including the applicable nominal bus voltage. CTS LCO 3.8.2.3 requires the Trains AB (Train B) and CD (Train A) DC buses to be OPERABLE and lists the specific buses. CTS LCO 3.8.2.5 requires the Train N bus (Bus N) to be OPERABLE. ITS LCO 3.8.9 requires the applicable electrical power distribution subsystems to be OPERABLE, and lists the Train A and Train B AC electrical power distribution subsystems; Train A and Train B 120 VAC vital bus electrical power distribution subsystems; Train A and Train B 250 VDC distribution subsystems; and the Train N 250 VDC distribution subsystem. This changes the CTS by moving the specific names of the buses and the associated nominal bus voltages (i.e., 4160 V and 600 V) from the CTS to the ITS Bases.	Bases	ITS 5.5.12	1

Table LA - Removed Details
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.8.10 LA.1	LCO 3.8.2.2, 4.8.2.2, LCO 3.8.2.4, 4.8.2.4.1	CTS LCO 3.8.2.2 requires the AC electrical buses to be OPERABLE and "energized." CTS 4.8.2.2 also requires the AC buses to be demonstrated OPERABLE and "energized" by verifying correct breaker alignment and indicated power availability. CTS LCO 3.8.2.4 requires the DC bus to be "energized" and OPERABLE. CTS 4.8.2.4.1 requires the verification that the DC bus is determined OPERABLE and "energized" by verifying correct breaker alignment and indicated power availability. ITS LCO 3.8.10 requires the applicable electrical power distribution subsystems to be OPERABLE and ITS SR 3.8.10.1 requires the verification of correct breaker alignments and voltage to each required AC, DC, and 120 VAC vital bus electrical power distribution subsystems. This changes the CTS by moving the procedural detail that the buses must be “energized” from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.8.10 LA.2	LCO 3.8.2.2, LCO 3.8.2.4	CTS LCO 3.8.2.2 requires AC electrical buses to be OPERABLE and specifies nominal bus voltages. CTS LCO 3.8.2.4 requires a 250 VDC bus to be OPERABLE and specifies bus voltage. ITS LCO 3.8.10 requires necessary portions of the AC, DC, and 120 VAC vital bus electrical power distribution subsystems to be OPERABLE to support equipment required to be OPERABLE. ITS SR 3.8.10.1 requires the verification of correct breaker alignment and voltage to each required AC, DC, and 120 VAC vital bus electrical power distribution subsystems. This changes the CTS by moving description of the buses (including the nominal bus voltages) from the Specification to the ITS Bases. Other changes to CTS LCO 3.8.2.2 and CTS LCO 3.8.2.4 are discussed in DOCs M.1 and LA.1.	Bases	ITS 5.5.12	1
3/4.8.3 LA.1	3/4.8.3	CTS LCO 3.8.3.1 requires the steady state bus voltage for the manual alternate reserve source (i.e., a qualified offsite source) to be greater than or equal to 90% of the nominal bus voltage whenever the manual alternate reserve source (69 kV) is connected to more than two buses. The CTS 3.8.3.1 Action covers the situation when the bus voltage is less than 90% nominal. The action is to adjust the load on the remaining buses to maintain steady state bus voltage greater than or equal to 90% limit. The ITS does not include the requirements for the steady state bus voltage for the manual alternate reserve source. This changes the CTS by moving the explicit requirements for the steady state bus voltage for the manual alternate reserve source, including the Action and Surveillance Requirement, from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6

Table LA - Removed Details
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
3.9.1 LA.1	LCO 3.9.1	CTS 3.9.1 states that the boron concentration in MODE 6 shall be the more restrictive reactivity condition of a keff of 0.95 or less or a boron concentration of ≥ 2400 ppm. ITS LCO 3.9.1 states that the boron concentration shall be within the limit specified in the COLR. This changes the CTS by relocating the MODE 6 boron concentration limit, which must be confirmed on a cycle-specific basis, to the CORE OPERATING LIMITS REPORT (COLR).	COLR	ITS 5.6.5	5
3.9.1 LA.2	4.9.1.2	CTS 4.9.1.2 requires that the boron concentration of the Reactor Coolant System and the refueling canal be determined "by chemical analysis" at least once per 72 hours. ITS SR 3.9.1.1 and SR 3.9.1.2 require verification that boron concentration is within the limit specified in the COLR. ITS SR 3.9.1.1 and SR 3.9.1.2 do not specify that the boron concentration be determined by chemical analysis. This changes the CTS by moving details of how the boron concentration is determined from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
3.9.2 LA.1	LCO 3.9.2	CTS 3.9.2 states that two source range neutron flux monitors shall be operating, "each with continuous visual indication in the control room." ITS 3.9.2 LCO states that two source range neutron flux monitors shall be OPERABLE. This changes the CTS by moving the requirement that each channel has a continuous visual indication in the control room from the CTS to the Bases.	Bases	ITS 5.5.12	1
3.9.3 LA.1	LCO 3.9.4 b.2.c (including footnote *)	CTS 3.9.4.b.2.c allows both doors of each airlock to be open provided, in part, that a designated individual is available at all times to close an airlock door if required. A footnote associated with CTS 3.9.4.b clarifies that for the purpose of this Specification, an OPERABLE airlock door is a door that is capable of being closed and secured. The footnote also states that cables or hoses transversing the airlock shall be designed to allow for removal in a timely manner (e.g., quick disconnects). ITS 3.9.3.b requires that one door in each air lock is capable of being closed, but does not provide the level of description provided in the CTS. This changes the CTS by moving the requirement for a designated individual and the details on cables or hoses that transverse the air lock from the CTS to the ITS Bases.	Bases	ITS 5.5.12	3
CTS 3/4.9.3 LA.1	3/4.9.3	CTS LCO 3.9.3 requires the reactor to be subcritical for a required period of time (100 hours from September 15 through June 15 and 148 hours from June 16 through September 14) prior to movement of irradiated fuel in the reactor pressure vessel. ITS 3.9 does not include the requirements for decay time. This changes the CTS by moving the explicit decay time requirements from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6

Table LA - Removed Details
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 3/4.9.13 LA.1	3/4.9.13	CTS LCO 3.9.13 requires the movement of the spent fuel cask above elevation 620 feet to be done with the spent fuel cask handling crane operating in the Controlled Path Mode of operation. The ITS does not include the requirements for the movement of the spent fuel cask above elevation 620 feet. This changes the CTS by moving the explicit requirements for movement of the spent fuel cask above elevation 620 feet, including the Action and Surveillance Requirement, from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6
CTS 3/4.9.14 LA.1	3/4.9.14	CTS LCO 3.9.14 specifies that the maximum weight of a spent fuel cask used with the Cask Drop Protection System be limited to 110 tons (nominal). The ITS does not include this spent fuel cask weight limitation associated with the Cask Drop Protection System. This changes the CTS by moving the explicit spent fuel cask weight limitation associated with the Cask Drop Protection System, including the Action and Surveillance Requirement, from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6

Table LA - Removed Details
ITS Chapter 4.0 - Design Features

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
4.0 LA.1	5.2	CTS 5.2 describes the various design features of the reactor containment building. The ITS does not contain this information. This changes the CTS by moving the description of the reactor containment building to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.2	5.3.1	CTS 5.3.1 contains details of fuel assembly design, such as number of fuel rods per fuel assembly, the fuel rod nominal active fuel length, and the initial core loading maximum enrichment. The ITS does not contain these details, but provides a general statement that, "Each assembly shall consist of a matrix of Zircaloy or ZIRLO fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material." This changes the CTS by moving the detailed description of the fuel assemblies to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.3	5.3.2	CTS 5.3.2 contains details of control rod design, such as the nominal length of absorber material, percentage of each absorber material, and control rod cladding material. The ITS does not contain these details, but provides a general statement that, "The control material shall be silver indium cadmium, as approved by the NRC." This changes the CTS by moving the detailed description of the control rod assemblies to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.4	5.4	CTS 5.4 describes the Reactor Coolant System. The ITS does not contain this information. This changes the CTS by moving the description of the Reactor Coolant System to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.5	5.5 (Unit 1 only)	Unit 1 CTS 5.5 describes the Emergency Core Cooling Systems (ECCS). The ITS does not contain this information. This changes the Unit 1 CTS by moving the description of the ECCS to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.6	5.6 (Unit 1 only)	Unit 1 CTS 5.7 describes certain general Seismic Classification requirements. The ITS does not contain this information. This changes the Unit 1 CTS by moving the description of these general Seismic Classification requirements to the UFSAR.	UFSAR	10 CFR 50.59	1
4.0 LA.7	5.8.1 (Unit 1), 5.5.1 (Unit 2)	CTS 5.8.1 (Unit 1) and CTS 5.5.1 (Unit 2) describes the location of the meteorological tower. The ITS does not contain this information. This changes the CTS by moving the location of the meteorological tower to the UFSAR.	UFSAR	10 CFR 50.59	1

Table LA - Removed Details
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.1 LA.1	6.1.1, 6.1.2	CTS 6.1.1 uses the title "Plant Manager" and CTS 6.1.2 uses the title "Shift Manager." ITS 5.1.1 uses the generic title "plant manager" and ITS 5.1.2 uses the generic title "shift manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.	UFSAR	10 CFR 50.59	3
5.2 LA.1	6.2.1.b, 6.2.1.c, 6.2.2.g	CTS 6.2.1.b uses the title "Plant Manager," CTS 6.2.1.c uses the title "Senior Vice President - Nuclear Operations," and CTS 6.2.2.g uses the title "Operations Director." ITS 5.2.1.b uses the generic title "plant manager," ITS 5.2.1.c uses the generic title "A specified corporate officer," and ITS 5.2.2.e uses the generic title "operations manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.	UFSAR	10 CFR 50.59	3
5.2 LA.2	6.2.2, Table 6.2-1 (including footnote #)	CTS 6.2.2 and Table 6.2-1, including footnote #, provide minimum shift crew composition requirements. ITS 5.2.2 only includes the minimum shift crew composition requirements that are not already included in 10 CFR 50.54. This changes the CTS by moving the minimum shift crew composition requirements addressed by 10 CFR 50.54 to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
5.2 LA.3	6.2.2.f	CTS 6.2.2.f requires the Shift Manager and Unit Supervisor to hold a Senior Operator license. ITS 5.2.2 does not contain this requirement. This changes the CTS by moving the requirement for the Shift Manager and Unit Supervisor to hold a Senior Operator license to the TRM.	TRM	10 CFR 50.59	3
5.3 LA.1	6.3.1	CTS 6.3.1 uses the titles "Plant Radiation Protection Manager" and "Operations Director." ITS 5.3.1 uses the generic titles "radiation protection manager" and "operations manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.	UFSAR	10 CFR 50.59	3
5.4 LA.1	6.8.1.d	CTS 6.8.1.d requires that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. The ITS does not include these requirements. This changes the CTS by moving the requirements to the UFSAR.	UFSAR	10 CFR 50.59	3
5.4 LA.2	6.8.1.f	CTS 6.8.1.f requires written procedures be established, implemented and maintained covering the Quality Assurance Program for effluent and environmental monitoring, "using the guidance in Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975." ITS 5.4.1.c does not include the Regulatory Guide references. This changes the CTS by moving the references to the Regulatory Guides to the Quality Assurance Program Description (QAPD).	QAPD	10 CFR 50.54(a)	3
5.4 LA.3	6.8.2	CTS 6.8.2 requires that each procedure and administrative policy of Specification 6.8.1, and changes to these documents, including temporary changes, be reviewed prior to implementation in accordance with the QAPD. ITS 5.4 does not include this requirement. This changes the CTS by moving these details of procedure and administrative policy reviews to the QAPD.	QAPD	10 CFR 50.54(a)	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA.1	6.8.4.b	CTS 6.8.4.b, "Radiological Environmental Monitoring Program," describes a program to monitor the radiation and radionuclides in the environs of the plant. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM).	ODCM	ITS 5.5.1	6
5.5 LA.2	License Condition 2.I (Unit 1), License Condition 2.H (Unit 2)	Operating License Conditions 2.I (Unit 1) and 2.H (Unit 2) specify that the Iodine Monitoring Program shall be implemented and provides a description of what the program shall include. ITS 5.5 does not include this program. This changes the CTS by moving the details of the Iodine Monitoring Program to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	6
5.5 LA.3	4.0.5	CTS 4.0.5 provides requirements for the Inservice Inspection (ISI) Program. The ITS does not include ISI Program requirements. In addition, since the IST Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity. Pumps and valves are the only components related to the IST Program (as described in CTS 4.0.5.a). This changes the CTS by moving these requirements from the Technical Specifications to the ISI Program.	ISI Program	10 CFR 50.55a	6
5.5 LA.4	4.0.5.a	CTS 4.0.5.a specifies that the IST of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a. ITS 5.5.6 states that the IST Program provides controls for IST of ASME Code Class 1, 2, and 3 pumps and valves. This changes the CTS by moving these procedural details from the Technical Specifications to the IST Program.	IST Program	10 CFR 50.55a	3
5.5 LA.5	4.7.5.1.c.3, 4.7.5.1.d.1, 4.7.5.1.d.2, 4.7.6.1.b.4, 4.7.6.1.c.1, 4.7.6.1.c.2, 4.9.12.b.4, 4.9.12.c.1, 4.9.12.c.2	CTS 4.7.5.1.c.3, 4.7.5.1.d.1, 4.7.5.1.d.2, 4.7.6.1.b.4, 4.7.6.1.c.1, 4.7.6.1.c.2, 4.9.12.b.4, 4.9.12.c.1, and 4.9.12.c.2 require that within 31 days after removal of a carbon sample the laboratory analysis results are shown to be within limit. ITS 5.5.9.c requires the same analysis to be performed however the detail of "within 31 days after removal of a carbon sample" is not included. This changes the CTS by moving these procedural details from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
5.5 LA.6	4.8.1.1.2.c, 4.8.1.1.2.c.1), 4.8.1.1.2.c.1)a), 4.8.1.1.2.c.1)b), 4.8.1.1.2.c.2), 4.8.1.1.2.c.3), 4.8.1.1.2.c.4), 4.8.1.1.2.d	CTS 4.8.1.1.2.c, 4.8.1.1.2.c.1), 4.8.1.1.2.c.1)a), 4.8.1.1.2.c.1)b), 4.8.1.1.2.c.2), 4.8.1.1.2.c.3), 4.8.1.1.2.c.4), and 4.8.1.1.2.d specify test and sampling requirements for new diesel fuel oil and diesel fuel oil in the storage tanks in accordance with certain ASTM standards (i.e., D4057-81, D975-81, D1298-80, D4176- 82, D2622-82, and D2276-83) and provide limits for kinematic viscosity, flash point, API gravity, absolute specific gravity, and specific gravity. ITS 5.5.11 does not include either the explicit reference to the ASTM standards or the specific limits, but continues to require the verification that the new and stored diesel fuel oil is tested in accordance with the applicable standards and that the parameters are within limits. This changes the CTS by moving the procedural details on the testing requirements and the specific limits to the ITS Bases.	Bases	ITS 5.5.12	3

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
5.5 LA.7	3/4.11.1, 3/4.11.2.1, 3/4.11.2.2	CTS 3/4.11.1 includes the details for implementing the requirements for the liquid holdup tank. CTS 3/4.11.2.1 includes the details for implementing the requirements for the explosive gas mixture. CTS 3/4.11.2.2 includes the details for implementing the requirements for the gas storage tank. The details for implementing these requirements, including the specific limits, are not included in the ITS. The ITS only includes a requirement to maintain a program for these requirements. This changes the CTS by moving these procedural details for implementing the requirements, including the specific limits, from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59	3
5.5 LA.8	6.14.1.a, 6.14.1.b	CTS 6.14.1.a requires changes to the ODCM to be documented and records of reviews performed to be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. CTS 6.14.1.b requires changes to the ODCM to be effective after review and acceptance by the PORC and the approval of the plant manager. ITS 5.5.1.c.1 requires changes to the ODCM to be documented and records of reviews performed to be retained. ITS 5.5.1.c.2 requires changes to the ODCM to become effective after the approval of the plant manager. This changes the CTS by moving the record retention requirement reference and the PORC review and approval requirement to the Quality Assurance Program Description (QAPD).	QAPD	10 CFR 50.54(a)	3
5.5 LA.9	6.14.1.b	CTS 6.14.1.b uses the title "Plant Manager." ITS 5.5.1.c.2 uses the generic title "plant manager." This changes the CTS by moving the specific CNP organizational title to the UFSAR and replacing it with a generic title.	UFSAR	10 CFR 50.59	3
5.6 LA.1	6.9.1.9.2	CTS 6.9.1.9.2 specifies the revision numbers and dates of the referenced methodologies used for the development of the COLR. ITS 5.6.5.b does not contain this level of detail. This changes the CTS by moving the specific methodology references for revisions and dates to the COLR.	COLR	ITS 5.6.5	3
5.7 LA.1	6.12.1, 6.12.2	CTS 6.12.1.c uses the title "Plant Radiation Protection Manager" and CTS 6.12.2 uses the titles "Shift Manager" and "Plant Radiation Protection Manager." ITS 5.7.1.c uses the generic title "radiation protection manager" and ITS 5.7.2 uses the generic titles "shift manager" and "radiation protection manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.	UFSAR	10 CFR 50.59	3
CTS 6.0 LA.1	6.4	CTS 6.4 states that a retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the retraining and replacement training program to the UFSAR.	UFSAR	10 CFR 50.59	6
CTS 6.0 LA.2	6.6.1.b	CTS 6.6.1.b states that each reportable event shall be reviewed by the PORC, and the results of this review shall e submitted to the NSRB and the Site Vice President. The ITS does not include this requirement. This changes the CTS by moving these details of Reportable Event Action to the Quality Assurance Program Description (QAPD).	QAPD	10 CFR 50.54(a)	6

Table LA - Removed Details
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process	Change Type
CTS 6.0 LA.3	6.11	CTS 6.11 provides requirements for the Radiation Protection Program. The ITS does not include these requirements. This changes the CTS by moving the requirements for the Radiation Protection Program to the UFSAR.	UFSAR	10 CFR 50.59	6
CTS 6.0 LA.4	1.28, 6.13.1	CTS Definition 1.28 contains the definition for the Process Control Program (PCP). CTS 6.13.1 describe the process for control of changes to the PCP. The ITS does not include these requirements. This changes the CTS by moving the requirements of the PCP to the UFSAR.	UFSAR	10 CFR 50.59	6

Table LA - Removed Details
Change Types

Change Types:
1 - Removing Details of System Design and System Description, including Design Limits
2 - Removing Descriptions of System Operation
3 - Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms
5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the COLR
6 - Removal of LCO, SR, or other TS Requirement to the TRM, UFSAR, ODCM, QAPD, or IIP

REPLACEMENT PAGES FOR
DRAFT SAFETY EVALUATION ATTACHMENT 6,
TABLE R - RELOCATED SPECIFICATIONS

ATTACHMENT 6

Table R - Relocated Specifications

Table R - Relocated Specifications
ITS Chapter 1.0 - Use and Application

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Chapter 2.0 - Safety Limits

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Section 3.0 – LCO and SR Applicability

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Section 3.1 – Reactivity Control Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.1.2.1 R.1	3/4.1.2.1	CTS 3/4.1.2.1 provides requirements on the boration systems flow paths during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59
3/4.1.2.2 R.1	3/4.1.2.2	CTS 3/4.1.2.2 provides requirements on the boration systems flow paths during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.1.2.3 R.1	3/4.1.2.3	CTS 3/4.1.2.3 provides requirements on the charging pumps during shutdown when used as part of the boration system. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual. It should be Noted that this Specification also has requirements concerning the maximum number of charging and safety injection pumps that can be OPERABLE. This Discussion of Change does not address these requirements; they are covered in ITS 3.4.12. It should also be Noted that this Specification has requirements associated with the safe shutdown requirements of 10 CFR 50 Appendix R. These requirements are discussed in DOC L.1.	TRM	10 CFR 50.59
3/4.1.2.4 R.1	3/4.1.2.4	CTS 3/4.1.2.4 provides requirements on the charging pumps during operation when used as part of the boration system. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.1.2.5 R.1	3/4.1.2.5	CTS 3/4.1.2.5 provides requirements on the boric acid transfer pumps during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59
3/4.1.2.6 R.1	3/4.1.2.6	CTS 3/4.1.2.6 provides requirements on the boric acid transfer pumps during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.1.2.7 R.1	3/4.1.2.7	CTS 3/4.1.2.7 provides requirements on the borated water sources during shutdown. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59
3/4.1.2.8 R.1	3/4.1.2.8	CTS 3/4.1.2.8 provides requirements on the borated water sources during operation. The boration subsystem of the Chemical and Volume Control System (CVCS) provides the means to meet one of the functional requirements of the CVCS, i.e., to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the SHUTDOWN MARGIN. To accomplish this functional requirement, the CTS requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and appropriate charging pumps to provide the necessary charging head. The boration subsystem is not assumed to be OPERABLE to mitigate the consequences of a DBA or transient. In the case of a malfunction of the CVCS that causes a boron dilution event, the response required by the operator is to close the appropriate valves in the reactor makeup system. This action is required before the SHUTDOWN MARGIN is lost. Operation of the boration subsystem is not assumed to mitigate this event. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual.	TRM	10 CFR 50.59

Table R - Relocated Specifications
ITS Section 3.2 - Power Distribution Limits

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3.3.3 R.1	Tables 3.3-11 and 4.3-7 (Unit 1) Instruments 9, 12, 13, 14, and 17, Tables 3.3-10 and 4.3-10 (Unit 2) Instruments 9, 12, 13, 14, and 17	Unit 1 CTS Tables 3.3-11 and 4.3-7 and Unit 2 CTS Tables 3.3-10 and 4.3-10 provide requirements for Post-Accident Monitoring Instrumentation channels. Each individual post accident monitoring parameter has a specific purpose, however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant. The NRC position on application of the screening criteria to post- accident monitoring instrumentation is documented in a letter dated May 9, 1988 from T.E. Murley (NRC) to W.S. Wilgus (B&W Owners Group). The screening criteria are now incorporated into 10 CFR 50.36(c)(2)(ii). The NRC position taken was that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments. Accordingly, this position has been applied to the CNP Units 1 and 2 Regulatory Guide 1.97 instruments. Those instruments meeting these criteria have remained in Technical Specifications. The instruments not meeting these criteria will be relocated from the Technical Specifications to the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.3.3.2 R.1	3/4.3.3.2	CTS 3/4.3.3.2 ensures the OPERABILITY of movable incore detector instrumentation when required to monitor the flux distribution within the core. The instrumentation is used for periodic Surveillance of the reactor core power distribution, and calibration of the excore neutron flux detectors, but is not assumed in any design basis accident (DBA) analysis and does not mitigate an accident. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.3.3.3 R.1	3/4.3.3.3	CTS 3/4.3.3.3 provides requirements for seismic instrumentation. In the event of an earthquake, seismic instrumentation is required to permit comparison of the measured response to that used in the design basis of the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR 100. Since this is determined after the event has occurred, it has no bearing on the mitigation of any design basis accident (DBA). This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.3.3.4 R.1	3/4.3.3.4	CTS 3/4.3.3.4 provides requirements for meteorological instrumentation. Meteorological instrumentation is used to measure environmental parameters that may affect distribution of fission products and gases following a design basis accident (DBA), but it is not an input assumption for any DBA analysis and does not mitigate the accident. Meteorological information is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

Table R - Relocated Specifications
ITS Section 3.3 - Instrumentation

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.3.3.5.1 R.1	3/4.3.3.5.1	CTS 3/4.3.3.5.1 provides requirements for Appendix R remote shutdown instrumentation. The Appendix R remote shutdown instrumentation is used to ensure that a fire will not preclude achieving safe shutdown. This instrumentation is independent of areas where a fire could damage systems normally used to shutdown the reactor. However, the instrumentation is not used to detect a degradation of the reactor coolant pressure boundary, and is not assumed to mitigate a design basis accident (DBA) or transient event. The Appendix R remote shutdown instrumentation capability is consistent with the requirements of 10 CFR 50, Appendix R. The acceptability of the relocation of the Appendix R Technical Specification requirements from the plant Technical Specifications has already been endorsed by the NRC as indicated in Generic Letter 86-10. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.3.3.9 R.1	3/4.3.3.9	CTS 3/4.3.3.9 provides requirements for explosive gas monitoring instrumentation. The Explosive Gas Monitoring Instrumentation Specification is provided to ensure that the concentration of potentially explosive gas mixtures contained in the gaseous waste processing system is adequately monitored, which will help ensure that the concentration is maintained below the flammability limit. However, the system is designed to contain detonations, and detonations would not affect the function of any safety related equipment. The concentration of oxygen in the gaseous Waste Processing System is not an initial assumption of any design basis accident (DBA) or transient analysis. This Specification does not meet the criteria for retention in the Improved Technical Specifications (ITS); therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.4.7 R.1	3/4.4.7	CTS 3/4.4.7 provides limits on the oxygen, chloride and fluoride content in the RCS. Poor coolant water chemistry contributes to the long term degradation of system materials of construction, and thus is not of immediate importance to the unit operator. Reactor coolant water chemistry is monitored for a variety of reasons. One reason is to reduce the possibility of failures in the Reactor Coolant System pressure boundary caused by corrosion. However, the chemistry monitoring activity is of a long term preventative purpose rather than mitigative. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.4.9.2 R.1	3/4.4.9.2	CTS 3/4.4.9.2 states that the pressurizer temperature shall be limited to a maximum heatup of 100°F or cooldown of 200°F in any one hour period and a maximum spray water temperature differential of 320°F. The limits meet the requirements given in the ASME Boiler and Pressure Vessel Code, Section III, Appendix G. These limitations are consistent with structural analysis results. However, these limits are not initial condition assumptions of a DBA or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Statement the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in Technical Specifications. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.4.10.1 R.1	3/4.4.10.1	CTS 3/4.4.10.1 provides requirements for the ASME Code Class 1, 2 and 3 components to ensure their structural integrity. The inspection programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity of these components will be maintained throughout the life of the components. ASME Code Class 1, 2, and 3 components are monitored so that the possibility of component structural failure does not degrade the safety function of the system. The monitoring activity is of a preventive nature rather than a mitigative action. Other Technical Specifications require important systems to be OPERABLE (for example, Emergency Core Cooling Systems) and in a ready state for mitigative action. This Technical Specification is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. Hence, it is not necessary to retain this Specification to ensure immediate OPERABILITY of safety systems. Further, this Technical Specification prescribes inspection requirements that are performed during plant shutdown. It is, therefore, not directly important for responding to design basis accidents. This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.4.12.1 R.1	3/4.4.12.1	CTS 3/4.4.12.1 provides requirements for the reactor vessel head vents. The reactor vessel head vents are provided to exhaust noncondensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a loss-of-coolant accident (LOCA). Their function, capabilities, and testing requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however, the operation of reactor vessel head vents is not part of the primary success path. The operation of these vents is an operator action after the event has occurred, and is only required when there is indication that natural circulation is not occurring. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.4.12.2 R.1	3/4.4.12.2	CTS 3/4.4.12.2 provides requirements for the pressurizer steam space vents. The pressurizer steam space vents are provided to exhaust noncondensible gases and/or steam from the RCS which could inhibit natural circulation core cooling following any event involving a loss of offsite power and requiring long term cooling, such as a loss-of-coolant accident (LOCA). Their function, capabilities, and testing requirements are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," however, the operation of pressurizer steam space vents is not part of the primary success path. The operation of these vents is an operator action after the event has occurred, and is only required when there is indication that natural circulation is not occurring. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

Table R - Relocated Specifications
ITS Section 3.5 - Emergency Core Cooling Systems (ECCS)

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Section 3.6 - Containment Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.6.5.2 R.1	3/4.6.5.2	CTS 3/4.6.5.2 provides requirements on the Ice Bed Temperature Monitoring System. The Ice Bed Temperature Monitoring System monitors the temperature of the ice bed to ensure that the ice bed temperature does not increase above the required limits undetected. However, the Ice Bed Temperature Monitoring System is not required to ensure the ice bed temperature is maintained within limits. Another Technical Specification (that is being retained) will continue to ensure that temperature is maintained within the required limits. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.6.5.4 R.1	3/4.6.5.4	CTS 3/4.6.5.4 provides requirements on the Inlet Door Position Monitoring System. The Inlet Door Position Monitoring System monitors the position of the ice bed inlet doors during normal operation to ensure that the ice bed inlet doors do not open (which could allow the ice bed temperature to increase above the required limits). However, the Inlet Door Position Monitoring System is not required to ensure the inlet doors remain closed and ice bed temperature is maintained within limits. Other Technical Specifications (that are being retained) will continue to ensure that the inlet doors remain closed and temperature is maintained within the required limits. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.7.2 R.1	3/4.7.2	CTS 3.7.2.1 states that the temperature of both the primary and secondary coolants in the steam generators shall be greater than 70°F when the pressure of either coolant in the steam generator is greater than 200 psig. The limitation on steam generator pressures and temperatures ensures that pressure-induced stresses on the steam generators do not exceed the maximum allowable fracture toughness limits. These pressure and temperature limits are based on maintaining a steam generator RT_{NDT} sufficient to prevent brittle fracture. As such, the Technical Specification places limits on variables consistent with structural analysis results. However, these limits are not initial condition assumptions of a design basis accident (DBA) or transient. These limits represent operating restrictions and Criterion 2 includes operating restrictions. However, it should be noted that in the Final Policy Statement the Criterion 2 discussion specified only those operating restrictions required to preclude unanalyzed accidents and transients be included in Technical Specifications. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59
3/4.7.7 (Unit 1) and 3/4.7.8 (Unit 2) R.1	3/4.7.7 (Unit 1), 3/4.7.8 (Unit 2)	CTS 3.7.7.1 (Unit 1) and CTS 3.7.8.1 (Unit 2) state that each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting materials or 5 microcuries of alpha emitting material, shall be free of greater than or equal to 0.005 microcuries of removable contamination. The limitations on sealed source contamination are intended to ensure that the total body and individual organ irradiation doses do not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limitation of $\leq$ 0.005 microcuries of removable contamination on each sealed source. This requirement and the associated Surveillance Requirements bear no relation to the conditions or limitations that are necessary to ensure safe reactor operation. This Specification does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

Table R - Relocated Specifications
ITS Section 3.8 - Electrical Power Systems

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Section 3.9 - Refueling Operations

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
3/4.9.5 R.1	3/4.9.5	CTS 3.9.5 states that direct communications shall be maintained between the control room and personnel at the refueling station during CORE ALTERATIONS. This ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS. The prompt notification of the control room of a fuel handling accident is not an assumption in the fuel handling accident analysis. While notification is necessary to ensure that the control room is isolated to meet the control room operator dose limits in General Design Criteria 19, the fuel handling accident analysis does not take credit for direct communications between the refueling station and the control room (30 minutes is assumed before control room operator actions are taken). This LCO does not meet the criteria for retention in the ITS; therefore, it will be retained in the Technical Requirements Manual (TRM).	TRM	10 CFR 50.59

Table R - Relocated Specifications
ITS Chapter 4.0 - Design Features

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE

Table R - Relocated Specifications
ITS Chapter 5.0 - Administrative Controls

ITS/CTS No. and DOC No	CTS Requirement	Description of Relocated Requirement	Location	Change Control Process
NONE	NONE	NONE	NONE	NONE