Table A
Administrative Changes
Section 1.0 - Use and Application

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 1.0 CTS 1.0	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	1.1 Definitions	1.0 Definitions Unit 2 - 3/4.3.2 (ESFAS)
ITS 1.0 CTS 1.0	A.2	The CTS definition of OPERATIONAL MODE is revised consistent with the corresponding ISTS definition by the addition of two more conditions. The conditions of vessel head closure bolt tension and fuel in the reactor vessel have been added to the CTS definition.	1.1 Definitions	1.4
ITS 1.0 CTS 1.0	A.3	The CTS definition of ACTION is revised consistent with the corresponding ISTS definition for ACTIONS. The revision incorporates the ISTS specific terms for Required Actions and Conditions into the definition.	1.1 Definitions	1.5
ITS 1.0 CTS 1.0	A.4	The CTS definition of OPERABLE - OPERABILTY is revised consistent with the corresponding ISTS definition. The function to be performed by the system or component is further defined as its "safety" function. This change alters the CTS operability definition of a component or system from being able to perform "functions" to being able to perform "safety functions".	1.1 Definitions	1.6
ITS 1.0 CTS 1.0	A.5	The CTS definition of OPERABLE - OPERABILTY is revised consistent with the corresponding ISTS definition. The revision changes the CTS OPERABILITY requirement that both normal "and" emergency power be available. The revised OPERABILITY requirement specifies that normal "or" emergency power be available. The ISTS addresses the availability of normal and emergency power more fully in Technical Specification Section 3.8, "Electrical Systems".	1.1 Definitions	1.6
ITS 1.0 CTS 1.0	A.6	The CTS definition section contains several defined terms that are no longer used in the ISTS. The following CTS definitions for REPORTABLE EVENT, CONTAINMENT INTEGRITY, FREQUENCY NOTATION, SOURCE CHECK, GASEOUS RADWASTE TREATMENT SYSTEM, VENTILATION EXHAUST TREATMENT SYSTEM, PURGE-PURGING, PROCESS CONTROL PROGRAM, VENTING, MAJOR CHANGES, MEMBER(S) OF THE PUBLIC are deleted. Consistent with the ISTS the unused definitions are no longer needed in the TS.	1.1 Definitions	1.7, 1.8, 1.21, 1.27, 1.28, 1.31, 1.32, 1.33, 1.34, 1.35, 1.36
ITS 1.0 CTS 1.0	A.7	The CTS definition of CHANNEL CALIBRATION contains the phrase "… the entire channel, including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The ISTS version of this definition contains the following phrase that replaces the CTS phrase described above; "…all the devices in the channel required for channel OPERABILITY."	1.1 Definitions	1.9
ITS 1.0	A.8	The CTS definition of CHANNEL FUNCTIONAL TEST requires that channel Operability be	1.1 Definitions	1.11

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 1.0		verified "including alarm and/or trip functions". The corresponding ISTS definition for CHANNEL OPERATIONAL TEST requires that OPERABILITY be verified for "all devices in the channel required for channel OPERABILITY". In addition, the ISTS definition states that " The COT may be performed by means of any series of sequential, overlapping, or total channel steps". The CTS definition is being revised to be consistent with the corresponding ISTS version.		
ITS 1.0 CTS 1.0	A.9	The CTS SHUTDOWN MARGIN (SDM) definition is revised to incorporate the ISTS provision that "with any RCCA not capable of being fully inserted, the reactivity worth of the RCCA must be accounted for in the determination of SDM".	1.1 Definitions	1.13
ITS 1.0 CTS 1.0	A.10	The CTS SDM is further revised consistent with the ISTS by the addition of the requirement that "in MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal zero power design level."	1.1 Definitions	1.13
ITS 1.0 CTS 1.0	A.11	The CTS definition of STAGGERED TEST BASIS is revised to conform to the corresponding ISTS definition. This changes the CTS definition to specify the frequency of a Surveillance on one system, subsystem, train, or other designated component instead of specifying the frequency in which all systems, subsystems, trains, or other designated components must be tested. This change affects the presentation of the Surveillance Frequencies.	1.1 Definitions	1.20
ITS 1.0 CTS 1.0	A.12	Unit 1 only. The CTS definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR PROTECTIVE SYSTEM RESPONSE TIME are revised consistent with the ISTS definitions to more fully describe how the response time tests are performed. This changes the CTS definitions by adding the statement 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.	1.1 Definitions	1.22, 1.23
ITS 1.0 CTS 1.0	A.13	The CTS average Coolant Temperatures specified in Table 1.1 for Power Operation and Startup are revised consistent with the ISTS. The CTS Table specifies $\geq$ 350°F for these Modes of operation. The corresponding ISTS Table 1.1-1 does not specify a temperature for these Modes and "NA" is used instead of a temperature.	Table 1.1-1	Table 1.1
ITS 1.0 CTS 1.0	A.14	The Rated Thermal Power requirements in CTS Table 1.1 for Modes 3, 4, 5, and 6 are revised consistent with the ISTS. The CTS specifies "0" % Rated Thermal Power in Table 1.1 and the ISTS in corresponding Table 1.1-1 specifies "NA" for Rated Thermal Power in these Modes.	Table 1.1-1	Table 1.1
ITS 1.0 CTS 1.0	A.15	The CTS k_{eff} value of $\leq$ 0.95 for Mode 6 in Table 1.1 is revised consistent with the ISTS Table 1.1-1. The CTS k_{eff} value is replaced by "NA" consistent with the ISTS presentation of this information. The ISTS specifies the k_{eff} value for refueling in a different Technical Specification location.	Table 1.1-1	Table 1.1

Table A
Administrative Changes
Section 1.0 - Use and Application

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 1.0 CTS 1.0	A.16	The CTS Mode 6 definition in Table 1.1 is modified consistent with the ISTS. The phrase in the footnote describing the Mode 6 condition as being with "fuel in the vessel" is moved to the definition of Mode. This revises the CTS by making the condition of "with fuel in the reactor vessel" applicable to all Modes not just the Refueling Mode.	Table 1.1-1	Table 1.1
ITS 1.0 CTS 1.0	A.17	CTS Table 1.2 "Frequency Notation" is deleted consistent with the ISTS. This revises the CTS by eliminating the frequency notation codes for each surveillance interval described in the CTS table. The ISTS describes each interval in the surveillance where it is applied, so the CTS Table is not required.	NA	Table 1.2
ITS 1.0 CTS 1.0	A.18	The CTS definition of DOSE EQUIVALENT I-131 is revised consistent with the ISTS. The CTS equation for calculating DOSE EQUIVALENT I-131 is replaced by the ISTS reference to ICRP 30. This change removes the specific CTS equation used to calculate DOSE EQUIVALENT I-131and replaces it with a reference to the conversion factors required to be used when calculating DOSE EQUIVALENT I-131.	1.1 Definitions	1.19
ITS 1.0 CTS 1.0	A.19	Unit 2 only. The CTS requirements for actuation relays is revised to be consistent with the ISTS definition of MASTER RELAY TEST. The ISTS definition states that the MASTER RELAY TEST may be performed by means of any series of sequential, overlapping, or total steps. The change to the CTS requirement is the allowance to perform the test "by means of any series of sequential, overlapping, or total steps."	1.1 Definitions	Unit 2 - 3/4.3.2 (ESFAS)
ITS 1.0 CTS 1.0	A.20	Unit 2 only. The CTS requirement for slave relay testing is revised to be more consistent with the ISTS definition of SLAVE RELAY TEST. The ISTS SLAVE RELAY TEST contains the allowance that the test "may be performed by means of any series of sequential, overlapping, or total steps". This allowance is incorporated into the CTS definition. This changes the CTS by adding the allowance to perform the test "by means of any series of sequential, overlapping, or total steps."	1.1 Definitions	Unit 2 - 3/4.3.2 (ESFAS)
ITS 1.0 CTS 1.0	A.21	ISTS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS Section 1.0. The new ISTS Sections are added to the CTS. This change to the CTS adds explanatory information for the use of the ISTS that is not applicable to the CTS.	1.2, 1.3, 1.4	NA
ITS 1.0 CTS 1.0	A.22	The CTS Pressure Temperature Limits Report (PTLR) is revised consistent with the corresponding ISTS definition. The proposed change eliminates the references to Specifications 3.4.9.1 and 3.4.9.3 from the PTLR definition.	1.1 Definitions	1.38

Table A
Administrative Changes
Section 2.0 - Safety Limits

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 2.0 CTS 2.0	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	2.0 Safety Limits	2.0 Safety Limits

Table A
Administrative Changes
Section 3.0 - LCO and SR Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.0 CTS 3/4.0	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.0	3/4.0
ITS 3.0 CTS 3/4.0	A.2	CTS 3.0.1 states, “Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Limiting Condition for Operation 3.0.6”. The corresponding ISTS 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 3.0.7.” CTS 3.0.1 is revised to be consistent with the ISTS.	LCO 3.0.1	3.0.1
ITS 3.0 CTS 3/4.0	A.3	CTS 3.0.2 states, “Noncompliance with a specification shall exist when the requirements of the Limiting Conditions for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Conditions for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.” The corresponding ISTS 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.” CTS 3.0.2 is revised to be consistent with the ISTS.	LCO 3.0.2	3.0.2
ITS 3.0 CTS 3/4.0	A.4	CTS 3.0.3 is applicable, “when a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements.” ISTS LCO 3.0.3 expands those applicability requirements so that 3.0.3 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.” CTS 3.0.3 is revised consistent with ISTS 3.0.3.	LCO 3.0.3	3.0.3
ITS 3.0 CTS 3/4.0	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. In the ISTS, 3.0.3 states the time limits (Completion Times) from the time the condition (3.0.3) was entered. This is consistent with the way all Action times are counted in the ISTS and the use of Completion Times as described in ISTS Section 1.3, "Completion Times. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in the ISTS. The CTS is revised consistent with the ISTS.	LCO 3.0.3	3.0.3
ITS 3.0 CTS 3/4.0	A.6	CTS 3.0.3 states, “Where corrective measures are completed that permit operation under the ACTION requirement, 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.”	LCO 3.0.3	3.0.3

Table A
Administrative Changes
Section 3.0 - LCO and SR Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		ISTS 3.0.3 states this as, “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.” The CTS is revised to be consistent with the ISTS wording.		
ITS 3.0 CTS 3/4.0	A.7	CTS 3.0.3 is modified by the addition of the ISTS provision that " LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4." The addition of this provision represents a clarification of the 3.0.3 requirements that is consistent with the CTS Bases description of the 3.0.3 requirements.	LCO 3.0.3	3.0.3
ITS 3.0 CTS 3/4.0	A.8	CTS 3.0.5 is eliminated consistent with the ISTS. The part of CTS 3.0.5 that allows equipment to be considered OPERABLE if either the normal or emergency power is OPERABLE is effectively addressed by the ISTS definition of OPERABLE-OPERABILITY.	1.1 Definitions	3.0.5
ITS 3.0 CTS 3/4.0	A.9	CTS 3.0.5 is eliminated consistent with the ISTS. The part of CTS 3.0.5 that provides conditions (Actions) to be met within a specified time when a normal or emergency power supply is inoperable, is addressed by the ISTS Actions for an inoperable Diesel Generator and inoperable offsite circuit(s) in ITS LCO 3.8.1, “AC Sources-Operating.	3.8.1 (Actions)	3.0.5
ITS 3.0 CTS 3/4.0	A.10	ISTS LCO 3.0.7 is added to the CTS. The new ITS LCO 3.0.7 provides guidance for the application of Test Exception LCOs. The addition of LCO 3.0.7 provides a clarification of how Test Exceptions are used in the Technical Specifications. The guidance provided by LCO 3.0.7 is consistent with the use and application of current test exception Specifications and does not provide a new restriction or allowance.	LCO 3.0.7	NA
ITS 3.0 CTS 3/4.0	A.11	The CTS Specifications refer to the “allowed surveillance interval” as defined by CTS 4.0.2. The corresponding ISTS Specifications utilize the term “specified Frequency” instead of allowed surveillance interval. The affected CTS Specifications are revised to conform to the ISTS. This changes the CTS by using the term “specified Frequency” in place of “allowed surveillance interval.”	3.0	3/4.0
ITS 3.0 CTS 3/4.0	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 percent of the surveillance interval.” ISTS 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.” The CTS is revised to be consistent with the ISTS.	SR 3.0.2	4.0.2

Table A
Administrative Changes
Section 3.0 - LCO and SR Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.0 CTS 3/4.0	A.13	CTS 4.0.5 addresses the Inservice Inspection and Test requirements. In the ISTS, these requirements are addressed in the Administrative Controls Program section of the TS (Section 5.0). As such any changes to CTS 4.0.5 will be addressed in Section 5.0 along with the corresponding ISTS requirements. This change to Section 3.0 represents a movement of information within the TS.	5.0	4.0.5

Table A
Administrative Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.1, 3.1.2	3.1.1.1
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.2	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements for MODES with Tavg > 200°F. CTS 3.1.1.2 provides SDM requirements for MODE 5 (Tavg < 200°F). ITS 3.1.1 provides SDM requirements for MODES 2 with K_{eff} < 1.0 and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements in CTS 3.1.1.1 and CTS 3.1.1.2 into a single ITS specification.	3.1.1 Applicability	3.1.1.1 & 3.1.1.2 Applicability
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.3	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements in MODES 1, 2, 3 and 4. However, Surveillance 4.1.1.1.1.b states that when in MODES 1 and 2 with K_{eff} ≥ 1.0, SDM is verified by verifying that the control banks are within the insertion requirements of CTS 3.1.3.6, Control Rod Insertion Limits. In the ISTS the SDM Specification is applicable in MODE 2 with K_{eff} < 1.0 and MODES 3, 4, and 5 and the ISTS specification for the control bank insertion requirements is applicable in MODE 1 and MODE 2 with k_{eff} ≥1.0. The CTS SDM Specification is revised to be consistent with the ISTS presentation of these 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} ≥ 1.0 in the control bank specification.	3.1.1 Applicability	4.1.1.1.1.b
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.4	The Applicability of CTS 3.1.1.1 is MODES 1, 2, 3, and 4 with a footnote to MODE 2 stating, "See Special Test Exception 3.10.1." The corresponding ISTS 3.1.1 Applicability does not contain the footnote or a reference to the Special Test Exception. The CTS footnote is eliminated consistent with the ISTS.	3.1.1 Applicability	3.1.1.1 Applicability
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.5	CTS Surveillances 4.1.1.1.1.a requires verification of SHUTDOWN MARGIN within one hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. In the ISTS, these surveillance are considered Actions that are associated with an inoperable rod. As such the ISTS specifies these requirements in ITS 3.1.4 (Actions A.1.1, B.2.1.1 and B.2.3).	ITS 3.1.4 (Actions A.1.1, B.2.1.1 and B.2.3)	4.1.1.1.1.a and 4.1.1.2.a
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	A.6	CTS Surveillances 4.1.1.1.1.b requires the verification that control bank withdrawal is within the insertion limits of Specification 3.1.3.6 (Control Rod Insertion Limits). This CTS surveillance is only required to be performed with Keff ≥ 1.0 (footnote #). In the ISTS, this surveillance requirement (SR 3.1.6.2) is contained in Specification 3.1.6 (Control Bank Insertion Limits) which is applicable when Keff is ≥ 1.0 (no footnote needed). The CTS is revised to conform to the ISTS location for this surveillance requirement. This changes the CTS by moving this surveillance requirement from the SDM LCO to the Control Rod Insertion Limits LCO and eliminating the need for the CTS # footnote specifying with Keff ≥	SR 3.1.6.2	4.1.1.1.1.b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		1.0.		
ITS 3.1.1 CTS 3.1.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.1	3.1.1.2
ITS 3.1.1 CTS 3.1.1.2	A.2	CTS 3.1.1.1 provides SHUTDOWN MARGIN (SDM) requirements for MODES with Tavg > 200°F. CTS 3.1.1.2 provides SDM requirements for MODE 5 (Tavg < 200°F). ITS 3.1.1 provides SDM requirements for MODES 2 with K_{eff} < 1.0 and MODES 3, 4, and 5. This changes the CTS by combining the SDM requirements in CTS 3.1.1.1 and CTS 3.1.1.2 into a single ITS specification.	3.1.1	3.1.1.2
ITS 3.1.1 CTS 3.1.1.2	A.3	CTS Surveillance 4.1.1.2.a requires verification of SHUTDOWN MARGIN within one hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. These CTS surveillance requirements are effectively duplicated in the Actions for CTS 3.1.3.1, Group Height. In the ISTS, these surveillance are considered Actions that are associated with an inoperable rod. As such the ISTS specifies these requirements in ITS 3.1.4, Rod Group Alignment Limits (Actions A.1.1, B.2.1.1 and B.2.3). ITS 3.1.4 corresponds to CTS 3.1.3.1, Group Height.	3.1.4 (Actions A.1.1, B.2.1.1 and B.2.3)	4.1.1.2.a
ITS-NA CTS 3.1.1.3		**NONE**		
ITS 3.1.3 CTS 3.1.1.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.3	3.1.1.4
ITS 3.1.3 CTS 3.1.1.4	A.2	CTS 3.1.1.4 specifies two MTC limits (3.1.1.4.a and 3.1.1.4.b). These limits represent a beginning of core life or upper limit for MTC (3.1.1.4.a) and an end of life or lower limit for MTC (3.1.1.4.b). The corresponding ISTS (3.1.3) specifies these limits by type (i.e., upper and lower) and allows the upper limit to be specified by either stating the limit in the LCO or referring to the figure containing the graphic limit. The CTS is revised to incorporate the ISTS reference to upper and lower limits and refer to the figure containing the upper limit	3.1.3 LCO	3.1.1.4 LCO

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		instead of stating the limit in the LCO.		
ITS 3.1.3 CTS 3.1.1.4	A.3	CTS 4.1.1.2.b specifies the requirements for verifying the lower MTC limit is met. The CTS surveillance requires that the lower limit be verified at any power level within 7 EFPD after reaching a Rated Thermal Power equilibrium boron concentration of 300 ppm. The corresponding ISTS surveillance requirement (SR 3.1.3.2) differs in that it specifies that the lower limit be verified after reaching the equivalent of an equilibrium Rated Thermal Power all rods out boron concentration of 300 ppm. The differences are underlined. The CTS surveillance is revised to incorporate the ISTS differences.	SR 3.1.3.2	4.1.1.2.b
ITS 3.1.3 CTS 3.1.1.4	A.4	CTS 3.1.1.4 contains a # footnote that modifies the applicability of the CTS. The CTS footnote states "See Special Test Exception 3.10.3". The corresponding Unit 1 Note is the same but refers to Test Exception 3.10.4 instead of 3.10.3. The corresponding ISTS does not contain a similar footnote. The CTS is revised by the deletion of the Test Exception reference footnote.	NA	3.1.1.4 # footnote
ITS 3.1.8 CTS 3.1.2.9	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.8	3.1.2.9
ITS 3.1.8 CTS 3.1.2.9	A.2	CTS 3.1.2.9 specifies that "The following valves shall be locked, sealed or otherwise secured in the closed position…" The corresponding ISTS LCO requires that " Each valve used to isolate unborated water sources shall be secured in the closed position". The CTS LCO requirement is revised to be consistent with the ISTS. This changes the CTS requirement by eliminating the descriptions (locked, sealed) for the requirement to secure the valves in the closed position.	3.1.8 LCO	3.1.2.9 LCO
ITS 3.1.8 CTS 3.1.2.9	A.3	CTS 3.1.2.9 provides an exception to the LCO requirement for valves to be secured in the closed position. The CTS LCO requires that the valves be secured in the closed position "except during planned boron dilution or makeup activities". The corresponding ISTS LCO does not contain this exception. The CTS exception is retained in the BVPS specific version of the ISTS and formatted as a note allowing the exception under administrative controls consistent with similar LCO exceptions in the ISTS.	3.1.8 LCO	3.1.2.9 LCO
ITS 3.1.8 CTS 3.1.2.9	A.4	The CTS Action specifies that the actions are applicable with the requirement of the LCO not satisfied. The Corresponding ISTS Action states "One or more valves not secured in the closed position". The ISTS Action is modified by a note that allows separate Actions Condition entry for each unborated water source isolation valve. The CTS Action is revised to conform to the ISTS. This changes the CTS action by making the Action	3.1.8 Action	3.1.2.9 Action

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		statement more specific to the LCO requirements and incorporating the ISTS convention of separate condition entry for individual valves found not to meet the LCO requirements.		
ITS 3.1.8 CTS 3.1.2.9	A.5	CTS 3.1.2.9 Action statement 3 requires that SDM be verified in accordance with the applicable specifications listed below. As CTS 3.1.2.9 is applicable in Modes 4, 5, and 6, the CTS Action contains a list of the Specifications with SDM requirements in that must be met in Modes 4, 5, and 6. The ISTS does not list the applicable SDM specifications. The corresponding ISTS Action requires that the specific surveillance for SDM be performed. The CTS is revised to conform to the ISTS. This changes the CTS by simplifying the Action and referencing the applicable SDM surveillances that must be performed.	3.1.8 Action	3.1.2.9 Action
ITS 3.1.8 CTS 3.1.2.9	A.6	CTS surveillance 4.1.2.9 states "the above listed valve(s) shall be verified to be locked, sealed or otherwise secured in the closed position." The corresponding ISTS surveillance (SR 3.1.8.1) states " Verify each valve that isolates unborated water sources is secured in the closed position." The CTS surveillance is revised to conform to the ISTS surveillance wording.	SR 3.1.8.1	4.1.2.9
ITS 3.1.8 CTS 3.1.2.9	A.7	The CTS 3.1.2.9 footnote to Action 3 states "This action is required to be completed regardless of when the requirements of the above specification are satisfied". The corresponding ISTS requirement is a similar Note in Action Condition A. The CTS footnote is moved into the Actions Condition consistent with the ISTS.	3.1.8 Action A	3.1.2.9 footnote
ITS 3.1.4 CTS 3.1.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.1.4 CTS 3.1.3.1	A.2	CTS 3/4.1.3.1 LCO, Actions, and surveillances use the term "full length" when describing rods. The ISTS does not utilize this descriptive term. The term “full length” is deleted from the LCO and Actions. As BVPS does not use part length rods, the term “full length” is no longer required to differentiate the rod type.	3.1.4 LCO	3.1.3.1 LCO
ITS 3.1.4 CTS 3.1.3.1	A.3	CTS 3/4.1.3.1 Actions reference the Shutdown Margin (SDM) requirements contained in Specification 3.1.1.1. In CTS Specification 3.1.1.1 the specific value for the SDM requirement was moved into the COLR as part of the conversion to the ISTS. Consistent with the ISTS references to the SDM are revised from Specification 3.1.1.1 to the COLR.	3.1.4 Actions	3.1.3.1 Actions
ITS 3.1.4 CTS 3.1.3.1	A.4	CTS 3.1.3.1 Actions that refer to misaligned rod(s) state "with one [Action c or] with more than one [Action b] full length rod misaligned from its group step counter demand position by more than ± 12 steps (indicated position determined in accordance with Specification 3.1.3.2)...". The corresponding ISTS Actions state "one [Condition B or] more than one	3.1.4 Actions	3.1.3.1 Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		[Condition D] rod[s] not within alignment limits." The CTS Action text is revised to conform to the ISTS Action. This changes the CTS by eliminating the reference to the specific alignment limits in each Action.		
ITS 3.1.4 CTS 3.1.3.1	A.5	The Applicability of CTS 3.1.3.1 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." The corresponding ISTS Applicability does not contain the footnote or a reference to the Special Test Exception. The CTS is revised to conform to the ISTS format and presentation of Special Test Exceptions. The CTS note is deleted.	NA	3.1.3.1 footnote
ITS 3.1.4 CTS 3.1.3.1	A.6	CTS 3.1.3.1 Action 3.c requires that, " a power distribution map is obtained from the movable incore detectors and $F_Q(Z)$ and $F^N_{\Delta H}$ are verified to be within their limits within 72 hours". The corresponding ISTS Actions require the performance of SR 3.2.1.1, SR 3.2.1.2 and SR 3.2.2.1 within 72 hours. The CTS Actions are revised to conform to the ISTS. This changes the CTS by referencing the applicable surveillance requirements for verifying $F_Q(Z)$ and $F^N_{\Delta H}$ instead of using the peaking factor terms in the Action.	3.1.4 Action	3.1.3.1 Action
ITS 3.1.4 CTS 3.1.3.1	A.7	CTS surveillance 4.1.3.1.1 states in part, "each shutdown and control rod not fully inserted in the core shall be determined to be OPERABLE by movement…." The corresponding ISTS surveillance states, "verify rod freedom of movement (trippability) by moving each rod not fully inserted in the core…." The CTS surveillance is revised to conform to the ISTS. This changes the CTS by more clearly identifying the intent of the surveillance to verify trippability.	SR 3.1.4.2	4.1.3.1.1
ITS 3.1.4 CTS 3.1.3.1	A.8	CTS surveillance 4.1.3.1.2 states "The position of each full length rod shall be determined to be within ± 12 steps of the associated group demand counter by verifying the individual rod position at least once per 12 hours". The corresponding ISTS surveillance requires that individual rod positions be verified within the alignment limits every 12 hours. This changes the CTS surveillance by eliminating the reference to the specific alignment limits from the surveillance.	SR 3.1.4.1	4.1.3.1.2
ITS 3.1.4 CTS 3.1.3.1	A.9	The CTS rod group alignment limit LCO (3.1.3.1) is revised by the addition of a rod drop time surveillance requirement from CTS 3.1.3.4. In the ISTS, the rod operability requirements (including drop time) are contained in one TS, the Rod operability and alignment limits TS. As such, the placement of this surveillance in the alignment limits LCO is consistent with the ISTS location for this surveillance.	SR 3.1.4.3	3.1.3.4
ITS 3.1.7.2 CTS 3.1.3.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order,	3.1.7.2	3.1.3.2

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
(Unit 2)		etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	A.2	The ISTS 3.1.7 Actions are modified by a Note which states, “Separate Condition entry is allowed for each inoperable rod position indicator and each demand position indicator.” The CTS Actions are revised to include the ISTS Note. This changes the CTS by clarifying that the Actions may be applied to each inoperable indicator separately.	3.1.7.2 Actions	3.1.3.2 Actions
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	A.3	CTS 3.1.3.2 Action a.1 requires that the position of rods with inoperable indicators be verified immediately after any motion of the nonindicating rod which exceeds 24 steps in one direction since the last determination of the rod’s position. The corresponding ISTS Action(Condition C of LCO 3.1.7) is similar except for the Completion Time which is given as 4 hours in brackets. The brackets indicating that the CTS Time may be applied to this ISTS Action. BVPS will retain the CTS Completion Time (immediately) but revise the presentation of the Completion Time to be more consistent with the ISTS presentation of this type of Completion Time. The CTS Completion Time of immediately is revised to clarify that Action be initiated immediately to verify the rod position.	3.1.7.2 Actions	3.1.3.2 Actions
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	A.4	The CTS 3.1.3.2 Action b.1 is applicable when a demand position indicator is inoperable. This CTS action requires that all rod position indicators for the affected bank be verified operable. The corresponding ISTS Action clarifies this Action by the addition of the requirement to perform the Action by "administrative means". The CTS Action is revised to incorporate the ISTS requirement to perform the Action by "administrative means".	3.1.7.2 Action	3.1.3.2 Action
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.7.1	3.1.3.2
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.2	The ISTS Actions for inoperable rod position indication and demand indication systems are modified by a Note which states, “Separate Condition entry is allowed for each inoperable rod position indicator and each demand position indicator.” The CTS does not have a similar statement. The CTS is revised to include the ISTS note.	3.1.7.1 Actions	3.1.3.2 Actions
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.3	CTS 3.1.3.2 Action statement "a" provides a fast method to verify the validity of an analog position indicator by verifying the indication channel primary voltage. The Action requires that the primary voltage be verified for any indicators showing a potentially misaligned rod. The actual rod position can than be determined using the indication channel primary voltage. Changes are proposed to this Action to conform to the ISTS format and provide a more complete set of options. The ISTS does not have any corresponding Actions and the	3.1.7.1 Actions	3.1.3.2 Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		proposed change is a plant specific adaptation to the presentation format of the ISTS.		
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.4	CTS 3.1.3.2 Action b.1 states in part "Verify that all rod position indicators for the affected bank are OPERABLE…." The corresponding ISTS Action qualifies this Action by the addition of the term "by administrative means". The CTS Action is revised to incorporate the ISTS qualifier by "administrative means".	3.1.7.1 Actions	3.1.3.2 Actions
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.5	CTS 3.1.3.2 Action c.2 states " Reduce THERMAL POWER to less than 50% of RATED THERMAL power within 8 hours." This CTS Action was intended to provide an alternate Action for the other Actions specified in Action c. When the other Actions in Action c.1 could not be met, Action c.2 would be applicable. The ISTS contains the exact same alternate Action (to reduce power to less than or equal to 50%). In the ISTS however, this alternate Action is presented with each individual Action for which it is applicable. In this case the corresponding ISTS Action appears in three separate Actions Conditions (B, D, & E). The CTS Action is revised to conform with the ISTS presentation of this Action. This changes the CTS by stating the Action in 3 separate Actions Conditions instead of just once at the end of the Actions.	3.1.7.1 Actions	3.1.3.2 Actions
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.6	CTS surveillance 4.1.3.2.1.b requires that the demand position indication system be verified operable by " Performing a CHANNEL CHECK by an intercomparison between the control bank benchboard indicators and the logic solid state indicators in the logic cabinet, and determining their agreement within ± 2 steps, at least once per 92 days. The ISTS does not contain a corresponding surveillance. However, the ISTS contains similar surveillances that serve as a model for the presentation of this CTS surveillance in the ISTS format. Consistent with similar surveillances in the ISTS the CTS surveillance is revised to state " Verify the control bank benchboard indicators and the logic solid state indicators in the logic cabinet agree within ± 2 steps, once per 92 days." This changes the CTS surveillance by simplifying the requirement and eliminating the reference to performing a channel check.	SR 3.1.7.1.1	4.1.3.2.1.b
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.7	CTS surveillance 4.1.3.2.1.a and the associated * footnote contain requirements to verify the proper overlap of rod positions. The ISTS does not contain a corresponding surveillance in the rod position indication TS. The requirement to verify rod position overlap is contained in the rod insertion limits TS in the ISTS. The CTS requirements to verify rod position overlap are moved into the rod insertion limits TS (ITS 3.1.6) consistent with the ISTS.	SR 3.1.6.3	4.1.3.2.1.a
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	A.8	The CTS 3.1.3.2 # footnote to the Mode 2 applicability contains an allowance related to core Physics Testing in Mode 2. The allowance states that "For Core PHYSICS TESTING in Mode 2, primary detector voltage measurements may be used to determine the position of rods in shutdown banks A and B and control banks A and B for the purpose of satisfying Specification 3.1.3.2." The ISTS does not include a similar allowance. However, in the ISTS all exceptions (allowances) for Physic Testing are contained in a single TS, "Physics	3.1.9	3.1.3.2 # footnote

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		Tests Exceptions - Mode 2." Therefore, the CTS footnote is moved into ITS 3.1.9, Physics Test Exceptions - Mode 2.		
ITS 3.1.4 CTS 3.1.3.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.4	3.1.3.4
ITS 3.1.4 CTS 3.1.3.4	A.2	CTS 3.1.3.4 contains requirements for the "individual full length (shutdown and control)" rod drop time. The ISTS does not refer to full length rods or specify "shutdown and control". The Corresponding ISTS requirement simply specifies that the rod drop time of each rod be verified. The CTS requirements are revised to conform to the ISTS presentation of these requirements. This changes the CTS by eliminating references to "full length " rods and "shutdown and control" rods.	3.1.4	3.1.3.4
ITS 3.1.4 CTS 3.1.3.4	A.3	CTS 3.1.3.4, Action a, states that with the rod drop time of any full length rod determined to exceed the above limit, restore the rod drop time to within the above limit prior to proceeding to MODE 1 or 2. The corresponding ISTS (3.1.4) does not have a similar requirement. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the CTS Action for rod drop time not within the limit.	NA	3.1.3.4 Action
ITS 3.1.4 CTS 3.1.3.4	A.4	CTS 3.1.3.4 is a separate Specification for the rod drop testing requirements. The ISTS does not contain a separate Specification for rod drop testing. In the ISTS, the rod drop testing is a single surveillance requirement (SR 3.1.4.3) in ISTS 3.1.4, "Rod Group Alignment Limits". The ISTS Rod Group Alignment Limits Specification also addresses rod operability which encompasses the rod drop time. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating a separate specification for rod drop testing and moving the technical requirements for the Testing into ITS SR 3.1.4.3.	3.1.4	3.1.3.4
ITS 3.1.4 CTS 3.1.3.4	A.5	Unit 1 only. CTS 3.1.3.4, Action b, contains actions to follow if the rod drop times are measured with less than three reactor coolant loops in service and provide restrictions on power operation with less than all three reactor coolant loops in service. The ISTS does not contain similar restrictions. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating 2 loop operation requirements.	NA	3.1.3.4 Action
ITS 3.1.5 CTS 3.1.3.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical	3.1.5	3.1.3.5

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		Specifications-Westinghouse Plants" (ISTS).		
ITS 3.1.5 CTS 3.1.3.5	A.2	The CTS 3.1.3.5 Action states that "With a maximum of one shutdown rod inserted beyond the insertion limit, except for surveillance testing pursuant to Specification 4.1.3.1.1…." The corresponding ISTS 3.1.5 Action does not include the CTS reference to an exception. The ISTS contains a similar exception in the Applicability of the Specification. The CTS is revised to conform to the ISTS. This changes the CTS by moving the exception in the CTS action statement for surveillance testing pursuant to Specification 4.1.3.1.1 into a note in the applicability of the TS. In addition, the corresponding ISTS surveillance requirement number (SR 3.1.4.2) is substituted for the CTS number in the note.	3.1.5 Applicability	3.1.3.5 Action
ITS 3.1.5 CTS 3.1.3.5	A.3	The Applicability of CTS 3.1.3.5 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." The corresponding ISTS 3.1.5 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the footnote.	NA	3.1.3.5 footnote
ITS 3.1.5 CTS 3.1.3.5	A.4	Unit 1 CTS 3.1.3.5 contains the requirements for the Shutdown Bank Insertion Limits. The CTS surveillance 4.1.3.5 verifies the limits are met. The CTS surveillance is modified by a footnote that provides a one-hour thermal soak time below 50% power and limits the absolute value of rod motion during the one-hour to six steps. The corresponding ISTS surveillance does not have any similar provisions as the Unit 1 footnote. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the thermal soak footnote.	NA	3.1.3.5 footnote
ITS 3.1.6 CTS 3.1.3.6	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.6	3.1.3.6
ITS 3.1.6 CTS 3.1.3.6	A.2	CTS 3.1.3.6, Action a and b 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 bank position insertion limits specified in the CORE OPERATING LIMITS REPORT. The corresponding ISTS 3.1.6, Action A.2, simply requires that the control bank(s) be restored to within limits in 2 hours. The CTS is revised to conform to the ISTS. This changes the CTS by deleting Action b.	3.1.6 Action A.2	3.1.3.6 Actions a and b
ITS 3.1.6 CTS 3.1.3.6	A.3	CTS 3.1.3.6 is revised by the addition of a surveillance requirement (SR 3.1.6.1) consistent with the ISTS. This SR requires that the estimated critical control bank position be verified within the limits specified in the COLR within 4 hours prior to achieving criticality.	SR 3.1.6.1	NA

Table A
Administrative Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.1.6 CTS 3.1.3.6	A.4	The Applicability of CTS 3.1.3.6 is modified by a footnote, designated "*", stating, "See Special Test Exceptions 3.10.2 and 3.10.3." The corresponding ISTS 3.1.6 Applicability does not contain the footnote or a reference to the Special Test Exceptions. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the footnote reference to the Special Test Exceptions.	3.1.6 Applicability	3.1.3.6 Applicability footnotes
ITS 3.1.6 CTS 3.1.3.6	A.5	Unit 1 only. Unit 1 CTS surveillance 4.1.3.6 requires that the control rod banks be verified within the insertion limit. The Unit 1 surveillance is modified by a footnote that provides a one-hour thermal soak allowance and limits the absolute value of rod motion during the soak time to 6 steps. The corresponding ISTS surveillance does not contain a provision similar to the Unit 1 CTS footnote. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the footnote provision for a one-hour thermal soak.	NA	4.1.3.6 footnote
ITS - NA CTS 3.10.1, 3.10.2, & 3.10.3 (U1)		**NONE**		
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.1.9	3.10.3, 3.10.4
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)	A.2	CTS 3.10.3 is applicable in MODE 2. The corresponding ISTS Test Exception (ITS 3.1.9) is applicable, "During PHYSICS TESTS initiated in MODE 2." The CTS is revised to conform to the ISTS.	3.1.9 Applicability	3.10.3 Applicability
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)	A.3	CTS surveillance 4.10.3.2 requires that a CHANNEL FUNCTIONAL TEST be performed on the intermediate and power range channels. The corresponding ISTS surveillance specifies that a CHANNEL OPERATIONAL TEST be performed on each of the channels. The CTS is revised to conform to the ISTS. This changes the CTS by the use of the new ISTS defined term for quarterly instrument channel testing.	SR 3.1.9.1	4.10.3.2
ITS 3.1.9	A.4	Unit 1 CTS 3.10.4, PHYSICS TESTS, provides exceptions to several LCOs in order to	3.1.9	3.10.4

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)		perform routine post refueling outage physics testing. The following exception is added to the CTS exceptions for Physics Testing, "for Unit 1 only, primary detector voltage measurements may be used to determine the position of rods in shutdown banks A and B and control banks A and B for the purpose of satisfying Specification 3.1.7.1". The corresponding ISTS does not include this additional exception.		
ITS 3.1.10 CTS - NA		**NONE**		

Table A
Administrative Changes
Section 3.2 - Power Distribution Limits

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.2.3 CTS 3.2.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.3	3.2.1
ITS 3.2.3 CTS 3.2.1	A.2	The Applicability of CTS 3.2.1 is MODE 1 with THERMAL POWER ≥ 50% RTP with a footnote (**) stating, “See Special Test Exceptions 3.10.2.” The corresponding ISTS 3.2.3 Applicability does not contain the footnote or a reference to the Special Test Exception. The CTS footnote is eliminated consistent with the ISTS.	3.2.3 Applicability	3.2.1 Applicability footnote
ITS 3.2.1 CTS 3.2.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.1	3.2.2
ITS 3.2.1 CTS 3.2.2	A.2	Not used.		
ITS 3.2.1 CTS 3.2.2	A.3	The CTS surveillance 4.2.2.1 provides the following exception, "The provisions of Specification 4.0.4 are not applicable." The corresponding ISTS surveillances do not have a similar exception. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the exception to Specification 4.0.4.	3.2.1 SRs	4.2.2.1
ITS 3.2.2 CTS 3.2.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.2	3.2.3
ITS 3.2.2 CTS 3.2.3	A.2	CTS Action statement b states in part "Demonstrate through in-core mapping that $F^N_{\Delta H}$ is within its limit within 24 hours after exceeding the limit." The corresponding ISTS Action (A.2) requires that SR 3.2.2.1 be performed within 24 hours. The CTS Action is revised to conform to the ISTS Action. This changes the CTS by referencing a surveillance in the Action.	3.2.2 Action A.2	3.2.3 Action b
ITS 3.2.2 CTS 3.2.3	A.3	CTS 3.2.3, Action c requires 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, subsequent	3.2.2 Action A.3	Action c

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		POWER OPERATION may proceed provided that $F^N_{\Delta H}$ is demonstrated through in-core mapping to be within its limit. The CTS Action then specifies the various nominal power levels that can not be exceeded without verifying $F^N_{\Delta H}$. The corresponding ISTS 3.2.2, Action A.3, simply requires the performance of SR 3.2.2.1 prior to exceeding the specified power levels (the same power levels specified in the CTS). SR 3.2.2.1 requires measurement of $F^N_{\Delta H}$ by the use of incore measurements. The CTS Action is revised to conform to the ISTS Action A.3. 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 and the statement that $F^N_{\Delta H}$ must be demonstrated through incore mapping. In addition, the proposed change eliminates the reference to nominal power levels and simply requires verification prior to exceeding the specified power.		
ITS 3.2.2 CTS 3.2.3	A.4	CTS 3.2.3, Action c, requires that with $F^N_{\Delta H}$ exceeding its limit, $F^N_{\Delta H}$ must be measured prior to exceeding 50% RTP, 75% RTP, and within 24 hours of exceeding 95% RTP. The corresponding ISTS 3.2.2, Action A.3, contains the same requirements. However, ISTS 3.2.2, Action A.3, is modified by a Note that states, “THERMAL POWER does not have to be reduced to comply with this Required Action.” The CTS Action is revised to conform to the ISTS Action. This modifies the CTS by adding a Note stating that THERMAL POWER does not have to be reduced to comply with the Action.	3.2.2 Action A.3	3.2.3 Action c
ITS 3.2.4 CTS 3.2.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.2.4	3.2.4
ITS 3.2.4 CTS 3.2.4	A.2	The Applicability of CTS 3.2.4 is MODE 1 with THERMAL POWER > 50% RTP with a footnote (*) stating, “See Special Test Exceptions 3.10.2.” The corresponding ISTS 3.2.4 Applicability does not contain the footnote or a reference to the Special Test Exception. The CTS footnote is eliminated consistent with the ISTS.	3.2.4 Applicability	3.2.4 Applicability
ITS 3.2.4 CTS 3.2.4	A.3	CTS Action b requires that surveillance requirement 4.2.4 be performed to determine QPTR. The corresponding ISTS Action A.2 simply specifies that QPTR be determined. The CTS is revised to conform to the ISTS. This changes the CTS by replacing the reference to a specific surveillance requirement with the more general requirement to determine QPTR.	3.2.4 Action A.2	3.2.4 Action b
ITS 3.2.4 CTS 3.2.4	A.4	The CTS conditional surveillance 4.2.4.b for using the movable incore detectors to verify QPTR (under certain circumstances) specifies that the surveillance be performed once	SR 3.2.4.2	4.2.4.b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		within 12 hours and every 12 hours thereafter. The corresponding ISTS surveillance SR 3.2.4.2 presents the frequency for performing this surveillance in a different manner. The frequency of the ISTS surveillance is stated as simply 12 hours. However, the surveillance note that explains the conditional performance of the ISTS surveillance specifies that the surveillance is not required to be performed until 12 hours after the conditions are established under which the surveillance becomes applicable. The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by presenting the portion of the CTS frequency that requires performance "once within 12 hours" in the surveillance note as part of the conditions under which the surveillance becomes applicable.		

Table A
Administrative Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.1 CTS 3.3.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.1	3.3.1.1
ITS 3.3.1 CTS 3.3.1.1	A.2	The CTS 3/4.3.1 LCO statement, Applicability, and Actions are revised consistent with the ISTS format and presentation of this information. The CTS LCO statement is revised to eliminate the phrase “as a minimum”. The LCO requirements for a system or component are the minimum requirements by definition of the term “Limiting Condition for Operation" (LCO) in 10 CFR 50.36. Therefore, the CTS term “as a minimum" is not necessary to describe the LCO requirement and has been deleted. The CTS LCO statement is revised to address the instrument Functions in ISTS Table 3.3.1-1 instead of the channels and interlocks in CTS Table 3.3-1. The Functions listed in ISTS Table 3.3.1-1 include the channels and interlocks referenced in the CTS LCO. The Applicability of CTS 3/4.3.1 is revised to refer to the ISTS Table 3.3.1-1 instead of the corresponding CTS Table. In addition, the CTS 3/4.3.1 Actions are revised consistent with the ISTS. In addition, the CTS 3/4.3.1 Action reference to Table 3.3-1 is replaced with the ISTS Condition A which states the condition of one or more Functions (on Table 3.3.1-1) with one or more inoperable channels or trains. The ISTS Condition A Action provides the reference to the applicable Action Condition for each instrument Function listed on ISTS Table 3.3.1-1. The ISTS Condition A, effectively accomplishes the same thing as the CTS Action it replaces by referencing the Table containing the applicable Actions for each Function.	3.3.1 LCO, Applicability, & Actions	3.3.1.1 LCO, Applicability, & Actions
ITS 3.3.1 CTS 3.3.1.1	A.3	The CTS surveillance requirements 4.3.1.1.1, 4.3.1.1.2, and 4.3.1.1.3 contain the overall surveillance requirements for the RTS instrument functions. CTS 4.3 1.1.1 specifies Channel Checks, Channel calibrations and channel functional tests for the RTS Functions. CTS 4.3.1.1.2 describes the required testing for the RTS interlock functions and CTS 4.3.1.1.3 specifies response time testing be performed on the RTS Functions. In addition to the general requirements specified above, CTS Table 4.3-1 contains the specific surveillance tests associated with each RTS instrument function. CTS Table 4.3-1 is a separate Table for surveillance requirements that duplicates much of the information already presented for each RTS function in CTS Table 3.3-1. The ISTS does not include general instrument surveillance requirements that correspond to CTS 4.3.1.1.1, 4.3.1.1.2, and 4.3.1.1.3. The ISTS contains a list of all the surveillance requirements associated with each of the RTS instrument Functions. Each ISTS RTS surveillance is numbered and states a specific surveillance test requirement and performance frequency. The ISTS lists the surveillance requirements by number that are applicable to each RTS instrument function on one master Table (ISTS 3.3.1-1). The single ISTS Table 3.3.1-1 contains all the requirements for each RTS function. The list of surveillance requirements applicable to each RTS instrument function on ISTS Table 3.3.1-1 is different in presentation and format	Table 3.1.1-1 SRs	Table 4.3-1, 4.3.1.1.1, 4.3.1.1.2, and 4.3.1.1.3

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		from the CTS general surveillances (4.3.1.1.1, 4.3.1.1.2, and 4.3.1.1.3) and CTS surveillance Table 4.3-1, but contains similar information regarding the surveillance requirements associated with each RTS instrument Function. The CTS surveillance requirement presentation is revised to conform to the ISTS. This changes the CTS by eliminating the general surveillance requirements 4.3.1.1.1, 4.3.1.1.2, and 4.3.1.1.3 and the separate Surveillance Table (4.3-1).		
ITS 3.3.1 CTS 3.3.1.1	A.4	CTS surveillance 4.3.1.1.3 requires that response time testing be performed on the RTS functions and specifies that the testing be performed on "one channel per function such that all channels are verified 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". The corresponding ISTS surveillance for response time testing requires that the testing be performed on a "Staggered Test Basis". The CTS is revised to conform to the ISTS. This changes the CTS by replacing the explanation of how each channel must be tested with a simple reference to the TS defined term of "Staggered Test Basis". This change also includes the editorial revisions made to the corresponding Unit 1 response time testing surveillance (not shown) to change the Unit 1 CTS wording from “tested” to the more common ISTS descriptive term “verified” which is also consistent with the corresponding Unit 2 surveillance.	SR 3.3.1.14 (Response Time SR)	4.3.1.1.3
ITS 3.3.1 CTS 3.3.1.1	A.5	Unit 2 only. CTS Surveillance 4.3.1.1.1 requires that the RTS instrument functions be demonstrated operable in accordance with the requirements of Table 4.3-1. The CTS surveillance is modified by footnote 1. Footnote 1 states "For the automatic trip logic, the surveillance requirements shall be the application of various simulated input combinations in conjunction with each possible interlock logic state and verification of the required logic output including, as a minimum, a continuity check of output devices." The corresponding ISTS RTS surveillance requirements do not include a similar footnote. In the ISTS, the corresponding surveillance test requirements are identified in the defined terms of Section 1.0 of the TS. Individual ISTS surveillance requirements reference the defined terms of TS Section 1.0 as necessary. The CTS is revised to conform to the ISTS. This changes the CTS by moving the description of the test requirements for automatic trip logic to the definition section of the TS. The specific definition that defines this type of testing is the ISTS ACTUATION LOGIC TEST. Additionally, the CTS surveillance for automatic trip logic is revised to reference the performance of an ACTUATION LOGIC TEST (as defined in Section 1.0 of the TS).	SR 3.3.1.5 (Actuation Logic Test)	4.3.1.1.1, Footnote 1
ITS 3.3.1 CTS 3.3.1.1	A.6	The column headings for Functional Unit, Applicable Mode, and Action in CTS Table 3.3-1 are revised to conform to the corresponding column headings in ISTS Table 3.3.1-1. In the ISTS, the corresponding column headings are Function, Applicable Mode or Other Specified Condition, and Condition.	Table 3.3.1-1	Table 3.3-1
ITS 3.3.1	A.7	The CTS Table 3.3-1 table heading titled “Total Number of Channels” is revised to be	Table 3.3.1-1	Table 3.3-1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.1.1		"Required Channels" consistent with the corresponding ISTS Table 3.3.1-1 Table headings. In addition, the Minimum Channels Operable column of CTS Table 3.3-1 is deleted consistent with the content of the corresponding ISTS Table 3.3.1-1.		
ITS 3.3.1 CTS 3.3.1.1	A.8	The CTS Table 3.3-1 Allowable Value column title is revised by the addition of Unit specific designations. The corresponding ISTS Table does not include Unit specific designations. However, the BVPS specific implementation of the ISTS includes both Unit 1 and Unit 2 requirements in one set of TS. As each BVPS Unit may have different setpoints, the resulting BVPS ITS Table 3.3.1-1 is proposed with separate Unit 1 and Unit 2 Allowable Value columns for each RTS function.	Table 3.3.1-1	Table 3.3-1
ITS 3.3.1 CTS 3.3.1.1	A.9	CTS Functional Unit 6b (Source Range Neutron Flux without rod withdrawal capability) on CTS Table 3.3-1 is modified by two footnotes (8 and 9). CTS footnote 8 states that "Alternate detectors may only be used for monitoring purposes Without Rod Withdrawal Capability until detector functions are modified to permit equivalent alarm and trip functions." Footnote 8 applies to Unit 2 only. CTS Unit 2 footnote 9 (footnote 8 for Unit 1) states "In this condition, source range Function does not provide reactor trip but does provide indication." In addition, CTS Table 4.3-1 contains Note 15 which modifies the surveillance requirements associated with "Alternate" neutron flux detectors used for indication purposes. CTS Functional Unit 6b specifies requirements for source range indication only and contains no reactor trip requirements. This CTS Function is assigned a specific Action (5) that is associated only with this RTS Function. The Action is modified by footnote 7 which is also specific to this RTS Function. The ISTS RTS requirements do not address indication only functions. The corresponding ISTS RTS TS contains requirements for reactor trip instrumentation only. The CTS is revised consistent with the ISTS. This changes the CTS by moving the source range neutron flux instrument indication requirements (including all associated notes form Tables 3.3-1 and 4.3-1 and Action 5) out of the RTS TS and into a separate source range indication TS (ITS 3.3.8).	3.3.8 LCO Actions & SRs	Table 3.3-1 Function 6b, footnotes 8 & 9 Table 4.3-1 footnote 15 Action 5 footnote 7
ITS 3.3.1 CTS 3.3.1.1	A.10	Unit 2 only. The * footnote in CTS Table 3.3-1 provides an explanation of the acroymn RTP (Rated Thermal Power) used in some of the Allowable Values specified in the Table. The corresponding ISTS Table 3.3.1-1 does not include this footnote to explain RTP. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the footnote explanation of the acroymn RTP from CTS Table 3.3-1. In addition, this change addresses the removal of the * from each place it is used in CTS Table 3.3-1 to reference the RTP footnote.	Table 3.3.1-1	Table 3.3-1 * footnote
ITS 3.3.1 CTS 3.3.1.1	A.11	The CTS Table 3.3-1 Source Range Neutron Flux Function title "With Rod Withdrawal Capability" is deleted. The corresponding ISTS Function does not use this Function title to identify the source range instrumentation. In the ISTS, this information is contained in the plant condition specified in the Applicability for the Source Range RTS Function. The CTS is revised consistent with the ISTS. This changes the CTS by eliminating a separate	Table 3.3.1-1 Applicability	Table 3.3-1 Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		reference to the specified plant condition of the Applicability for this RTS Function. The plant condition of "with rod withdrawal capability" continues to be specified in the Applicability for Modes 3, 4, and 5 (CTS Note 3).		
ITS 3.3.1 CTS 3.3.1.1	A.12	Unit 2 only. The Allowable Value for CTS Functional Unit 9 (Pressurizer Pressure-Low) on Table 3.3-1 is modified by a ** footnote that specifies the time constants associated with the Allowable Value. In addition to the time constants (which are part of the Allowable Value) the footnote also specifies that "Channel calibration shall ensure that these time constants are adjusted to those values." The corresponding ISTS Functions in CTS Table 3.3.1-1 do not include footnotes with requirements for the channel calibration of the function. The ISTS includes the requirement to verify the time constants associated with a Function in the Channel Calibration Surveillance Requirement for that Function. The ISTS includes notes in the channel calibration surveillance that clarify or modify the requirements for that surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by moving the note affecting channel calibration from the list of functions on CTS Table 3.3-1into the RTS channel calibration surveillance requirement.	SR 3.3.1.10 (Channel Calibration SR)	Table 3.3-1 ** footnote
ITS 3.3.1 CTS 3.3.1.1	A.13	The CTS Loss of Flow Functions 12 and 13 on CTS Table 3.3-1 have been combined into one Function, ITS Function 10, Reactor Coolant Flow - Low, consistent with the ISTS. CTS Function 12, is effective above the P-8 interlock (30% RTP) and provides a reactor trip with low flow in a single RCS loop. CTS Function 13 is effective above the P-7 interlock (10% RTP) and below the P-8 interlock (30% RTP) and provides a reactor trip with low flow in two RCS loops. However, these CTS Functions utilize the same instrumentation that is required operable from 10% to 100% RTP. As such, the corresponding ISTS Function is presented as a single RTS Function, that requires the affected instrument channels to be operable above the P-7 interlock (10% RTP). The CTS is revised to be consistent with the ISTS. This changes the CTS by combining Functions 12 and 13 and eliminating essentially redundant information from CTS Table 3.3-1.	Table 3.3.1-1 Function 10	Table 3.3-1 Functions 12 & 13
ITS 3.3.1 CTS 3.3.1.1	A.14	The CTS Table 3.3-1 contains Function 21 for the Reactor Trip Breakers (RTBs). This CTS function includes Actions specifically for the undervoltage and shunt trip mechanisms associated with the RTBs as well as Actions for an RTB inoperable for other reasons. The corresponding ISTS Table 3.3.1-1 contains separate line item Functions for the RTBs and the RTB undervoltage and shunt trip mechanisms. The ISTS assigns the specific Actions for the undervoltage and shunt trip mechanisms to that Function line item and the Actions applicable to the RTB Function to the RTB Function line item. The CTS is revised to conform to the ISTS. This changes the CTS by creating a new separate Function line item for undervoltage and shunt trip mechanisms in CTS Table 3.3-1.	Table 3.3.1-1	Table 3.3-1 Function 21
ITS 3.3.1 CTS 3.3.1.1	A.15	The CTS allowable value for the RTS P-13 Function is expressed as "% RTP turbine first stage pressure equivalent". The corresponding ISTS P-13 Function is simply expressed as "% turbine power". The CTS is revised to conform to the ISTS. This changes the CTS	Table 3.3.1-1 P-13	Table 3.3-1 P-13

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		by expressing the P-13 function allowable value as % turbine power instead of % RTP turbine first stage pressure equivalent.		
ITS 3.3.1 CTS 3.3.1.1	A.16	CTS Note 3 in Table 3.3-1 states the following; " With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal." This CTS Note is used to modify the Applicability of RTS functions needed to mitigate the consequences of rod withdrawal events. The corresponding ISTS Note (a) states; " With Rod Control System capable of rod withdrawal or one or more rods not fully inserted." The CTS is revised to conform to the ISTS. This changes the CTS by removing the reactor trip breakers (RTBs) from the applicability requirement.	Table 3.3.1-1 Note (a)	Table 3.3-1 Note 3
ITS 3.3.1 CTS 3.3.1.1	A.17	The CTS Actions specify "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement…." or "With the number of channels OPERABLE one less than required by the Total Channels OPERABLE requirement…." These CTS Actions are based on the minimum channels operable or total channels specified in CTS Table 3.3-1 for each RTS Function. The ISTS does not contain a "minimum channels operable" or "total channels" requirement. The ISTS uses the single term "Required" channels or trains for all RTS Functions. In the ISTS, all Actions are based on one or more "Required" channels or trains inoperable. The ISTS Required Channels is equivalent to the CTS Total Channels requirement. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the Action references to the Minimum or Total channels operable and simply specifying "one channel inoperable". In some cases, the ITS Action Conditions are specific to a single RTS Function and may contain the Function name (e.g., one Turbine Trip channel inoperable). In addition, the ISTS Action Conditions may identify the RTS Function by "train" instead of by "channel" where applicable (e.g., the automatic trip logic RTS Function is not a channel and is referred to by trains of automatic trip logic).	3.3.1 Actions	Table 3.3-1 Actions
ITS 3.3.1 CTS 3.3.1.1	A.18	CTS Action 2, assigned to the Power Range Neutron Flux RTS Functions 2, 3, and 4 in CTS Table 3.3-1, is comprised of two parts (a and b). CTS Action 2a addresses the Power Range High Neutron Flux channels and CTS Action 2b addresses all the other Power Range Neutron Flux channels. CTS Action 2 is modified by footnote 4, applicable to both parts of the Action and footnote 5 which is applicable only to CTS Action 2a. The corresponding ISTS Actions are contained in Conditions D and E. The ISTS Conditions contain the same notes as the CTS but in the ISTS Note format with the Actions not as footnotes. ISTS Condition D corresponds to CTS Action 2a for the Power Range Neutron Flux High channels and ISTS Condition E corresponds to CTS Action 2b for the other Power Range Neutron Flux channels. The CTS is revised to conform to the ISTS presentation of these Action requirements. This changes the CTS by dividing CTS Action 2 into separate ISTS Action Conditions (D and E) and reformatting the CTS Actions into the ISTS format.	Actions D & E	Action 2
ITS 3.3.1 CTS 3.3.1.1	A.19	The Source Range RTS Function in CTS Table 3.3-1 is assigned Action Statement 4. CTS Action statement 4 is comprised of parts a, b, and c. CTS Action 4a is identified as	Actions H, I, & J	Action 4

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		applicable to Mode 2 below P-6, CTS Action 4b is identified as applicable to Modes 3, 4, and 5, and CTS Action 4c is identified as applicable to Mode 2 below P-6 and Modes 3, 4, and 5. The Corresponding ISTS Action Conditions are H, I, and J. ISTS Condition H is identified as applicable to Mode 2 below P-6, ISTS Condition I is identified as applicable to Mode 2 below P-6 and Modes 3, 4, and 5, and ISTS Condition J is identified as applicable to Modes 3, 4, and 5. The CTS Actions are revised to conform to the ISTS Action Conditions. This changes the CTS by reformating the single CTS Action statement 4 into 3 separate ISTS Action Conditions.		
ITS 3.3.1 CTS 3.3.1.1	A.20	CTS Action 7b provides the allowance that "the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.1.1.1." The corresponding ISTS Action Condition Note (in Conditions E, L, and K) states that "the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels." The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the reference to Specification 4.3.1.1.1 from the CTS Action 7b.	Actions E, K, & L	Action 7b
ITS 3.3.1 CTS 3.3.1.1	A.21	CTS Action 7 requires that the affected RTS channel be placed in the trip condition in 6 hours. CTS Action 7 is common to several RTS Functions. The corresponding ITS Action Conditions (E, K, and L) contain the same Action to place the channel in trip in 6 hours plus an additional default Action that is applicable if the Action to place the channel in trip can not be met. The ISTS default Action requirement is based on the applicable Mode of the RTS Function and serves to remove the plant from the applicable Mode of the affected RTS Function if the Action to place a channel in trip is not met. As such, the corresponding RTS Functions in the ISTS have different Action Conditions assigned to them depending on the applicable Mode of the RTS Function. The default Action of ISTS Condition E requires that the plant be placed in Mode 3 and is applicable to RTS Functions that are required operable in Modes 1 and 2. The default Action of ISTS Condition K requires that the power be reduced to $<$ P-7 and is applicable to RTS Functions that are required operable at power levels $\geq$ P-7. The default Action associated with ITS Condition L requires that the power be reduced to $<$ P-9 and is applicable to the Turbine Trip RTS Functions that are required operable at power levels $\geq$ P-9. The CTS action 7 is split to conform to ISTS Actions E, K, and L. This changes the CTS by assigning different Actions to the RTS Functions depending on the applicable Mode of the Function.	Actions E, K, & L	Action 7
ITS 3.3.1 CTS 3.3.1.1	A.22	CTS Action 1 provides the allowance that "one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.1.1.1 provided the other channel is operable." The corresponding ITS Action Condition M Note states that "one train may be bypassed for up to 4 hours for surveillance testing provided the other train is operable." The CTS is revised to conform to the ITS Condition Note. This changes the CTS by eliminating the reference to Specification 4.3.1.1.1 from the CTS Action 1.	Action M	Action 1
ITS 3.3.1	A.23	CTS Action 40b provides the allowance that "one channel may be bypassed for up to 2	Action N	Action 40b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.1.1		hours for surveillance testing per Specification 4.3.1.1.1, provided the other channel is operable." The corresponding ITS Action Condition N Note 1 states that "one train may be bypassed for up to 2 hours for surveillance testing provided the other train is operable." The CTS is revised to conform to the ITS Condition Note. This changes the CTS by eliminating the reference to Specification 4.3.1.1.1 from the CTS Action 40b.		
ITS 3.3.1 CTS 3.3.1.1	A.24	CTS Action 40 contains different Action requirements for the reactor trip breakers (RTBs) and for the undervoltage and shunt trip features that comprise the diverse trip mechanisms of the RTBs. The corresponding ISTS action Conditions N and Q separate the Actions applicable to the RTBs and the undervoltage and shunt trip mechanisms into two Action Conditions (Condition N for one inoperable RTB and Condition Q for one trip mechanism inoperable for one RTB. In addition, the CTS Action 40 allowances for bypassing the RTBs are retained as two notes in ITS Action Condition N for the RTBs. The CTS is revised to conform to the ISTS presentation of these Action requirements. This changes the CTS by separating the Actions for the RTBs from the Actions for the individual trip mechanisms.	Actions N & Q	Action 40
ITS 3.3.1 CTS 3.3.1.1	A.25	Unit 1 only. The Unit 1 CTS RTS Function 14, Steam Generator (SG) Water Level - Low - Low, is modified by reference to a "Loop Stop Valves Open" permissive. The corresponding ISTS (Function 14) and Unit 2 CTS RTS Functions do not contain a similar reference. The Unit 1 CTS is revised to conform to the ISTS and Unit 2 CTS. This changes the Unit 1 RTS Function 14 by deleting the reference to the "Loop Stop Valves Open" permissive.	Function 14	Function 14
ITS 3.3.1 CTS 3.3.1.1	A.26	The Unit 1 and Unit 2 BVPS Units have different Turbine Trip RTS Functions. The Unit 1 Function 18.a is Auto Stop Oil Pressure. The Unit 2 Function 18.A is Emergency Trip Header Low Pressure. The corresponding ISTS Turbine Trip Function simply lists Low Fluid Oil Pressure. These Unit 1 and Unit 2 CTS RTS Functions are revised into a single RTS line item similar to the ISTS. This changes the CTS by combining the Unit 1 Auto Stop Oil Pressure and the Unit 2 Emergency Trip Header Pressure under one RTS "Low Pressure" Turbine Trip Function item on ITS Table 3.3.1-1.	Turbine Trip Function	Function 18.a
ITS 3.3.1 CTS 3.3.1.1	A.27	Not used.		
ITS 3.3.1 CTS 3.3.1.1	A.28	The CTS RTS TS contains a separate Table (4.3-1) that contains the surveillance requirements associated with each RTS Function. In addition to the RTS Function surveillance requirements, CTS Table 4.3-1 contains a list of the RTS Functions and the Applicable Modes for each RTS Function. In order to simplify and consolidate the RTS Function requirements, the corresponding ISTS for RTS presents all the RTS requirements in a single Table (3.3.1-1). ISTS Table 3.3.1-1 contains a single list of RTS Functions and a single list of Applicable Modes for each Function. The CTS is revised to conform to the ISTS. This changes the CTS by consolidating CTS Tables 3.3.1 and 4.3.1 into a single Table (ITS 3.3.1-1).	Table 3.3.1-1	Tables 3.3-1 & 4.3-1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.1 CTS 3.3.1.1	A.29	CTS Table 4.3-1 contains the surveillance requirements for the RTS Functions. The CTS specifies a Channel Functional Test for certain RTS Functions. In place of the Channel Functional Test, the ISTS specifies the following surveillance tests depending on the Function: Channel Operational Test (COT), Trip Actuating Device Operational Test (TADOT), and Actuation Logic Test. The CTS is revised to replace the single Channel Functional Test requirement with the 3 new ISTS test requirements.	Table 3.3.1-1 SRs	Table 4.3-1
ITS 3.3.1 CTS 3.3.1.1	A.30	CTS surveillance 4.3.1.1.3 requires that "The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit…." The CTS surveillance is a general requirement that is interpreted to be applicable to those RTS Functions with response time limits assumed in the safety analyses. The list of RTS Functions with response time requirements that must be verified is maintained outside of the TS in the Licensing Requirements Manual (LRM). The ISTS provides a specific response time surveillance requirement that is assigned to each RTS Function that has required response time limits. The CTS is revised to conform to the ISTS. This changes the CTS by assigning a response time surveillance requirement to each individual RTS Function that has a required response time limit identified in the LRM.	SR 3.3.1.14 (Response Time Surveillance)	4.3.1.1.3
ITS 3.3.1 CTS 3.3.1.1	A.31	The CTS surveillances for the Safety Injection Input from ESF and the RCP Breaker Position RTS Functions specified on Table 4.3-1 require a Channel Functional Test (CFT) to be performed once per refueling (18 months). The corresponding ISTS surveillance for these RTS Functions requires a Trip Actuating Device Operational Test (TADOT) to be performed once per 18 months. The ISTS surveillance is modified by a note that specifies "verification of setpoint is not required." The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by explicitly stating that setpoint verification is not required for these two RTS Functions.	Table 3.3.1-1 (TADOT)	Table 4.3-1 (CFT)
ITS 3.3.1 CTS 3.3.1.1	A.32	CTS Table 4.3-1 contains a line item for the RTB Bypass Breakers. The CTS Table specifies two CFT surveillances for the RTB Bypass Breakers a monthly CFT and a refueling interval CFT. The corresponding ISTS Table 3.3.1-1 does not contain a specific line item for the RTB Bypass Breakers. The ISTS combines the surveillance requirements for the Bypass Breakers with the RTBs and the manual reactor trip function. The ISTS specifies one monthly (on a staggered test basis) TADOT for the RTBs and one 18 month TADOT for the manual reactor trip function. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating a specific line item for the RTB Bypass Breakers and combining the CTS surveillances for the RTB Bypass Breakers with the RTB and manual reactor trip function surveillances.	Table 3.3.1-1 Bypass breakers	Table 4.3-1 Bypass breakers
ITS 3.3.1 CTS 3.3.1.1	A.33	Unit 1 only. CTS Table 4.3-1 Note 5 states "each train tested every other month." The CTS Note is applicable to the surveillance requirements for the RTB and Automatic Trip Logic RTS Functions. The corresponding ISTS surveillance requirements for these RTS Functions specify that the surveillance is performed monthly on a STAGGERED TEST	SR 3.3.1.4	Table 4.3-1 Note 5

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		BASIS. The CTS is revised to conform to the ISTS. This changes the CTS by revising Note 5 from requiring that each train be tested every other month to the Function being tested monthly on a staggered test basis.		
ITS 3.3.1 CTS 3.3.1.1	A.34	The CTS surveillance requirements specified on Table 4.3-1 for the Overtemperature ΔT RTS Function include a channel check, channel functional test, and channel calibration. The corresponding requirements in the ISTS include two additional surveillances. The ISTS includes the surveillances that require that the excore nuclear instrumentation be adjusted and calibrated to agree with the incore instrumentation. The incore/excore calibration requirements (SR 3.3.1.3 and SR 3.3.1.9) are also specified for the power range neutron flux high setpoint RTS Function. The CTS is revised to conform to the ISTS. This changes the CTS by assigning two additional surveillances to the Overtemperature ΔT RTS Function.	SR 3.3.1.3 and SR 3.3.1.9	Table 4.3-1 Overtemperature ΔT Function
ITS 3.3.1 CTS 3.3.1.1	A.35	CTS Note 3 in Table 4.3-1 states "At least once every 31 Effective Full Power Days (EFPD) compare incore to excore axial imbalance above 15 percent of RATED THERMAL POWER. Recalibrate if absolute difference greater than or equal to 3 percent." The corresponding ISTS surveillance SR 3.3.1.3 is similar except that it states " Adjust NIS channel if absolute difference is ≥ 3%." The CTS is revised to conform to the ISTS. This changes the CTS by rewording the Note modifying the monthly comparison of the incore and excore detectors.	SR 3.3.1.3	Table 4.3-1 Note 3

Table A
Administrative Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.3	3.3.3.8
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.2	The title of Technical Specification 3/4.3.3.8, “Accident Monitoring Instrumentation,” is revised to “Post Accident Monitoring (PAM) Instrumentation.” The CTS LCO operability requirement and Actions are revised from referencing instrument “channels” to referencing instrument “Functions.” The requirements for each PAM instrument (Function) listed on CTS Table 3.3-11 are further revised to specify the "Required Channels" for each instrument Function instead of the "Total Channels" required for each Instrument. In addition, the CTS reference to "Minimum Channels Operable" on Table 3.3-11 is deleted. The proposed changes are consistent with the presentation of this information in the corresponding ITS 3.3.3, “Post Accident Monitoring (PAM) Instrumentation.	LCO	LCO
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.3	A Note is added to the CTS Actions that states: "Separate Condition entry is allowed for each Function." The ITS Note provides guidance on the application of the Action Conditions to each inoperable PAM instrument Function. The addition of the ITS Note clarifies that the Actions may be entered on a Function basis and is consistent with the change to reference instrument Functions in the LCO and Actions. The change is made to conform to the presentation of this information in the ISTS, and the change is necessary to support the ITS LCO and Actions which are written on a Function basis.	Actions	Actions
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.4	The CTS Surveillance Requirements consist of a single surveillance (4.3.3.8) and Table 4.3-7. The CTS Surveillance 4.3.3.8 states the defined test requirements (Channel Check and Channel Calibration) and refers to Table 4.3-7 for the specific frequency associated with each PAM Function. The ITS 3.3.3 Surveillance Requirements consist of three separate surveillances SR 3.3.3.1 (Channel Check), SR 3.3.3.2 (Channel Calibration), and SR 3.3.3.3 (TADOT). A note precedes the surveillances and specifies the applicability of the surveillances to the PAM Functions. Each ITS surveillance has a Frequency associated with it and is applicable to all PAM Functions (including the newly added Functions in ITS Table 3.3.3-1) except as stated in the Notes associated with ITS SRs 3.3.3.2 and SR 3.3.3.3. The notes associated with SR 3.3.3.2 and SR 3.3.3.3 serve to provide a separate TADOT surveillance (SR 3.3.3.3) applicable only to the containment isolation valve position indication Function instead of the Channel Calibration surveillance. In addition, ITS SR 3.3.3.2 contains a Note that excludes Neutron detectors from the Channel Calibration. As the ITS specifies the frequency in each surveillance, the ITS does not use a separate surveillance Table like CTS Table 4.3-7 for this purpose. The proposed changes result in three significant changes to the CTS Surveillances. The presentation of the surveillances is revised such that CTS Table 4.3-7 is deleted, a separate TADOT surveillance (SR 3.3.3.3) is introduced for the containment isolation valve position	Surveillances	Surveillances

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		indication Function, and an exception to the channel calibration requirement is introduced for neutron detectors.		
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.5	(Unit 2 only) CTS Table 3.3-11 contains a column that specifies the applicable Action(s) for each PAM instrument listed on the Table. The corresponding column in ITS 3.3.3 Table 3.3.3-1 specifies the applicable Action Condition referenced from Required Action D.1. The CTS is revised to conform to the ITS. This changes the CTS by replacing the CTS table column specifying all the applicable Actions for each PAM instrument with the ITS Table column specifying only the Action referenced from Required Action D.1 for each PAM Function.	Actions	Actions
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.6	The CTS PAM requirement for Core Exit Temperature consists of specifying 4 core exit thermocouples (CETs) per core quadrant. The ITS presents this requirement differently. The corresponding ITS requirement for Core Exit Temperature specifies (2) Required Channels for each core quadrant and lists each quadrant separately. In addition, the ITS requirement for two channels is modified by footnote (c) that requires each channel to contain two CETs. The CTS is revised to conform to the ITS. This changes the CTS by revising the presentation of the Core Exit Temperature Function to be stated in terms of "Required Channels."	LCO	LCO
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.7	CTS 3.3.3.1 Action "a" addresses the alarm or trip setpoints associated with radiation monitors. The alarm function of the Radiation monitors is being relocated to the LRM (along with the applicable Actions for the setpoint) and is addressed by an R DOC. CTS Action "b" references Table 3.3-6 for the appropriate Action to take for inoperable radiation monitors. Table 3.3-6 specifies Action 35 for the containment Radiation Monitors. The changes to Action 35 for the Radiation Monitors are addressed in separate DOCs. The ITS PAM requirements that become applicable to the Containment Radiation Monitor indication Function address only the indication Function of each instrument and do not include requirements (i.e., Actions) for alarm or trip setpoints. In addition, the ITS PAM Action requirements are structured differently and do not reference a Table for all Actions (only ITS Action Condition D references the table). As such, CTS Actions "a" and "b" are no longer required for the Containment Radiation Monitor PAM function and are not used in the PAM TS.	Actions	Actions
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.8	CTS Surveillance 4.3.3.1 Requires the performance of Channel Checks, Channel Functional Tests, and Channel Calibrations of the Radiation Monitors. The disposition of the CTS requirement for a Channel Functional Test is addressed in DOC R.2. CTS Surveillance 4.3.3.1 references Table 4.3-3 for the applicable Modes and Frequencies of the required surveillances for each Radiation Monitor. Changes to the Frequencies or Modes specified on Table 4.3-3 are addressed in separate DOCs. The corresponding PAM ITS surveillances are specified in SR 3.3.3.1 and SR 3.3.3.2 and contain the applicable Surveillance Frequency. The ITS Surveillances do not refer to a Table and use	Surveillances	Surveillances

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		the same Applicability as specified in the PAM ITS. The ITS Surveillances contain the appropriate guidance (notes) to assure they are applied correctly to each PAM Function. The CTS is revised to conform to the ITS. This changes the CTS by deleting Table 4.3-3 and including the Frequency within each Surveillance Requirement.		
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.9	CTS Table 3.3-6 contains the requirements for each Radiation Monitor. Table 3.3-6 lists the Radiation Monitors as "Instruments" and specifies the "Minimum Channels Operable" for each instrument. Table 3.3-6 lists Instrument 1.b "Containment Area" for the Containment Area Radiation Monitors and specifies (2) for the Minimum Channels Operable. In addition, Table 3.3-6 specifies Action 35 for the Containment Area Radiation Monitors. The differences between CTS Action 35 and ITS Action Conditions A, B, C, D, & F are addressed in separate DOCs. The corresponding ITS PAM Table 3.3.3-1 specifies the PAM instruments by "Function" with the "Required Channels" for each Function. The ITS Table specifies Action F for the Containment Radiation Monitors, but ITS Actions Conditions A, B, C & D are also applicable to the Containment Area Radiation Monitors. PAM ITS Table 3.3.3.1 specifies Function Number 10, Containment Area Radiation (High Range) and (2) Required Channels for the containment area Radiation Monitors. The CTS is revised to conform to the ITS. This changes the CTS Table 3.3-6 titles, numbering, and Actions specified for the Containment Area Radiation Monitors.	LCO	LCO
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	A.10	CTS Action b addresses the condition of less than the minimum channels operable. The CTS Action requires that the "inoperable channel(s)" be restored to operable status. The corresponding ITS Action (Condition C) addresses two or more inoperable channels and requires that "all but one" channel be restored to operable status. The difference between the wording used to describe the Action conditions addressed by the CTS and ITS Actions is discussed in DOC A.2. However, both CTS Action b and the corresponding ITS Condition C address the condition of multiple inoperable channels. This DOC addresses the change in the CTS Action requirement to restore the "inoperable channel(s)" to the corresponding ITS Action requirement to restore "all but one" channel for the condition of multiple inoperable channels.	Actions	Actions
ITS 3.3.4 CTS 3.3.3.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.4	3.3.3.5
ITS 3.3.4 CTS 3.3.3.5	A.2	CTS LCO 3.3.3.5 states “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 “The Remote Shutdown System Functions shall be OPERABLE.” The CTS is revised to conform to the ISTS. This changes the CTS by	3.3.4 LCO	3.3.3.5 LCO

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		referencing the required Remote Shutdown instrumentation by "Functions" instead of "channels".		
ITS 3.3.4 CTS 3.3.3.5	A.3	CTS LCO 3.3.3.5 Action states "With the number of OPERABLE remote shutdown monitoring channels less than required by Table 3.3-9, either: Restore the inoperable channel to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours." ITS LCO 3.3.4 Action A requires "One or more required Functions inoperable. Restore required Function to OPERABLE status in 30 days." Condition B states "Required Action and associated Completion Time not met be in MODE 3 in 6 hours and be in MODE 4 in 12 hours." This changes the CTS requirements for the remote shutdown by stating the requirements in the ITS format (i.e., referring to Functions instead of channels).	Action A&B	Actions
ITS 3.3.4 CTS 3.3.3.5	A.4	The CTS 3.3.3.5 Action specifies that "With the number of OPERABLE remote shutdown monitoring channels less than required…." The corresponding ITS 3.3.4 Action states "One or more required Functions inoperable." In addition, the ITS Action is modified by a Note, which states "Separate Condition entry is allowed for each Function." The CTS is revised to be consistent with the ISTS. This changes the CTS by the addition of the ISTS note allowing separate condition entry for each inoperable Function.	Actions	Actions
ITS 3.3.4 CTS 3.3.3.5	A.5	CTS 4.3.3.5 states "Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.3-6." A note in CTS Table 4.3-6 modifies the Source Range surveillance requirements. The Note states "Operability required in accordance with Specification 3.3.1.1." Table 4.3-6 does not specify a Channel Calibration for the Source Range indication. However, Specification 3.3.1.1 requires a refueling interval (18 month) Channel Calibration for the Source Range instrumentation with an exception for neutron detectors. The remaining Remote Shutdown channels on CTS Table 4.3-6 have a frequency requirement for the Channel Calibration listed as R (Refueling or 18 months). ITS SR 3.3.4.3 states "Perform Channel Calibration for each required instrumentation channel." The Frequency for the ISTS Channel Calibration surveillance is 18 months. The ISTS Channel Calibration surveillance requirement is modified by a note that states "Neutron Detectors are excluded from Channel Calibration". The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by including a separate 18-month Channel Calibration surveillance with a specific exception for neutron detectors. In addition the change adds the 18-month Channel Calibration requirement to the Remote Shutdown System Source Range indication.	SR 3.3.4.3	4.3.3.5
ITS 3.3.4 CTS 3.3.3.5	A.6	CTS surveillance 4.3.3.5 requires that "Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6. The corresponding ISTS surveillance requirements (SR 3.3.4.1 and SR 3.3.4.3) specify a Channel Check and Channel Calibration for each Remote Shutdown System instrument	SR 3.3.4.1 & SR 3.3.4.3	4.3.3.5, Table 4.3-6

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		channel but do not reference a Table. The CTS surveillance is revised to conform to the corresponding ISTS surveillance requirements. This changes the CTS by replacing the single CTS surveillance and associated Table 4.3-6 with the individual ISTS surveillances for Channel Check and Channel Calibration.		
ITS 3.3.5 CTS 3.3.2.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.5	3.3.2.1
ITS 3.3.5 CTS 3.3.2.1	A.2	The CTS Table 3.3-3 table heading titled “Total Number of Channels” is revised to be “Required Channels” consistent with the corresponding ITS Table 3.3.5-1 Table headings. In addition, the Minimum Channels Operable column of CTS Table 3.3-3 is deleted consistent with the content of the corresponding ITS Table 3.3.5-1.	Table 3.3.5-1	Table 3.3-3
ITS 3.3.5 CTS 3.3.2.1	A.3	Function 6 on Table 3.3-3 in the CTS ESFAS specification contains the "Loss of Power" instrumentation requirements. Two types of instrumentation are listed under Function 6 in CTS Table 3.3-3. Function 6 contains requirements for the instrumentation associated with the DG start on loss of voltage (DG start instrumentation) and for the instrumentation associated with protecting the emergency busses from undervoltage or degraded voltage conditions (bus separation instrumentation). The corresponding ISTS requirements for this type of instrumentation are contained in proposed ITS 3.3.5, "Loss of Power (LOP) Diesel Generator (DG) Start and Bus Separation Instrumentation". As such, the CTS requirements on Table 3.3-1 are moved to ITS 3.3.5 Table 3.3.5-1. In addition to moving the CTS requirements, the CTS requirements are reorganized into the subcategories of "Loss of Voltage" and "Degraded Voltage". The individual instruments listed on ITS Table 3.3.5-1 are further labeled as "DG Start" or "Bus Separation" consistent with the instrumentation function.	Table 3.3.5-1	Table 3.3-3
ITS 3.3.5 CTS 3.3.2.1	A.4	The CTS Action statements #33 and #34 applicable to the Loss of Power Instrumentation are replaced by the corresponding ITS Action Conditions (i.e., A, B, C, D and E). However, there is no corresponding CTS Action statement for ITS Condition A. ITS Action Condition A provides direction to the technical specification user to enter the applicable Action Conditions specified in Table 3.3.5-1. ITS Action Condition A states, "One or More Functions with one or more required channels inoperable. Enter the applicable Condition(s) referenced in Table 3.3.5-1 for the affected channel(s) immediately". ITS 3.3.5 Condition A is similar to Action Condition A in the ISTS RTS and ESFAS specifications and is necessary due to the use of the Table format (Table 3.3.5-1) to specify the individual requirements (including the applicable Actions) for each instrument function addressed by ITS 3.3.5. As such, the addition of ITS 3.3.5 Action Condition A is a	Action A	NA

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		requirement of the ISTS Table format and is necessary to more closely conform to the ISTS that use similar Tables (i.e., ISTS 3.3.1 and ISTS 3.3.2).		
ITS 3.3.5 CTS 3.3.2.1	A.5	CTS Action 33 specifies in part "with the number of OPERABLE Channels one less than the Total Number of Channels…." The corresponding ITS 3.3.5 Action Condition D is applicable to "one or more Functions with one channel per bus inoperable." This portion of CTS Action 33 is revised to be consistent with the corresponding ITS Action Condition D. This changes the CTS by reformatting the presentation of Action statement 33.	Action D	Action 33
ITS 3.3.5 CTS 3.3.2.1	A.6	CTS Action 34.a states in part that "With the number of OPERABLE channels one less than the Minimum Number of Channels, place the inoperable channel in the tripped condition…." The corresponding ITS Action Condition B states that with "One or more Functions with one channel per bus inoperable place the channel in trip." The CTS Action is revised to conform to the ITS Action Condition. This changes the CTS by reformatting the presentation of Action statement 34.a.	Action B	Action 34.a
ITS 3.3.5 CTS 3.3.2.1	A.7	CTS Actions 33 and 34.a and 34.b contain default requirements to declare the associated DG inoperable and apply the Required Actions of the DG specification if the other required Actions specified in CTS Actions 33 and 34 are not met. ITS 3.3.5 contains one default Action Condition (E) that is applicable when any Required Action and associated Completion Time is not met. ITS Condition E specifies that the applicable Condition(s) and Required Action(s) for the associated DG made inoperable by the LOP DG start or bus separation instrumentation be entered. The CTS default Actions are revised to conform with ITS Action Condition E. This changes the CTS by consolidating the three different CTS default Actions into a single ITS Action Condition.	Action E	Actions 33, 34, & 34.b
ITS 3.3.5 CTS 3.3.2.1	A.8	CTS Action 34.b requires that "with the number of OPERABLE channels two less than the Minimum Number of Channels, restore at least one of the two channel~~s~~ to OPERABLE status and place the other in the tripped condition within 1 hour…." The corresponding ITS Action Condition C specifies that with "One or more Functions with two channels per bus inoperable. Restore one channel per bus to OPERABLE status in 1 hour. The CTS Action is revised to conform to the ITS Action. This changes the CTS Action by stating the applicable Action condition in terms inoperable channels instead of operable channels, eliminating the reference to the minimum number of channels, and eliminating the requirement to place the other channel in the tripped condition.	Action C	34.b
ITS 3.3.5 CTS 3.3.2.1	A.9	CTS Table 4.3-2 contains the surveillance requirements for the ESFAS Functions that have been moved into ITS 3.3.5. The CTS specifies a Channel Functional Test for these ESFAS Functions. In place of the Channel Functional Test, the ISTS specifies a Trip Actuating Device Operational Test (TADOT). The CTS is revised to replace the Channel Functional Test requirement with the new ISTS defined TADOT requirement.	3.3.5, TADOT SR	Table 4.3-2, Channel Functional Test
ITS 3.3.5	A.10	CTS Table 4.3-2 contains the surveillance requirements for the loss of power	NA	Table 4.3-2

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.2.1		instrumentation (ESFAS Function 6). In addition to specifying the surveillance requirements, the CTS Table also repeats the list of Functions and the applicable Modes for each Function. CTS Table 4.3-2 specifies a Channel Calibration on a refueling (18 month) frequency and a Channel Functional Test on a quarterly frequency for each loss of power instrument function. The corresponding ITS 3.3.5 surveillance requirements (Channel Calibration and TADOT) are not listed in a table format. The ITS 3.3.5 surveillances are presented in the standard format without using a Table. The CTS is revised to conform to the ITS. This changes the CTS by eliminating Table 4.3-2 for the loss of power instrument function surveillances.		
ITS 3.3.5 CTS 3.3.2.1	A.11	The loss of power instrumentation is currently specified in CTS 3.3.2.1, "ESFAS" (Functions 6a, b, and c on CTS Table 3.3-3). CTS 3.3.2.1 contains a Note modifying the Actions that states "Separate ACTION statement entry is allowed for each Function." The corresponding ITS 3.3.5 Actions contains a similar note that states “Separate Condition entry is allowed for each Function.” The CTS 3.3.2.1 note affecting the loss of power instrument Functions is revised to be consistent with the corresponding ISTS note. This changes the CTS by revising the format of the Actions Note to conform to the ISTS convention for this note.	Actions Note	Actions Note
ITS 3.3.5 CTS 3.3.2.1	A.12	CTS Table 4.3-2 contains the surveillance requirements for the loss of power instrumentation (ESFAS Function 6). The CTS ESFAS surveillances also include the requirement to perform response time testing (ESFAS surveillance 4.3.2.1.3). The ESFAS surveillance requirement for response time testing is not included in Table 4.3-2 but is applicable to all ESFAS instrument functions with a response time specified in the LRM. However, as the loss of power instrumentation Functions are being removed from the ESFAS specification and placed in a different specification (ITS 3.3.5) the ESFAS requirement for response time testing must also be moved into ITS 3.3.5. The proposed change re-organizes the location of the ESFAS surveillance requirement (i.e., presents the response time surveillance along with the other surveillance requirements applicable to the loss of power instrumentation) in ITS SR 3.3.5.3.	SR 3.3.5.3	4.3.2.1.3
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.6	3.9.9 & 3.3.3.1
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 &	A.2	Unit 2 only. Unit 2 CTS 3.9.9 contains the requirements for the Containment Purge and Exhaust Isolation System. These requirements address the manual and automatic (on high radiation) isolation capability of the system. CTS 3.3.3.1, "Radiation Monitors" contains the requirements for the radiation monitors associated with the Containment	3.3.6	3.9.9 & 3.3.3.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.3.1		Purge and Exhaust Isolation System. ITS 3.3.6 consolidates the instrument requirements for the Containment Purge and Exhaust Isolation System (from CTS 3.9.9 and CTS 3.3.3.1) into a single Instrumentation TS. The ITS uses a Table (3.3.6-1) to list the required instrument channels and applicable surveillance requirements. The CTS is revised to conform to the ITS. This changes the CTS by consolidating the instrumentation requirements for the Containment Purge and Exhaust Isolation System into a single instrumentation TS (ITS 3.3.6).		
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.3	Unit 2 only. Unit 2 CTS 3.9.9 (ITS 3.3.6) is revised by the designation that the specification is applicable to Unit 2 only. This change affects both the CTS and ITS versions of this specification. The proposed change is necessary due to the design and licensing bases differences between BVPS Unit 1 and 2.	3.3.6	3.9.9
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.4	Unit 2 only. The Action for CTS 3.9.9 states in part, "With the Containment Purge and Exhaust isolation system inoperable…." The corresponding ITS 3.3.6 Action Condition specifies the following, " One or more manual channels inoperable or two radiation monitoring channels inoperable or Required Action and associated Completion Time for Condition A not met." The CTS Action is revised to be consistent with the ITS Action Condition B. This changes the CTS Action by specifying individual Action Conditions consistent with the instrumentation addressed by the new ITS 3.3.6.	Action B	3.9.9 Action
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.5	Unit 2 only. CTS 3.9.9 Action states, in part, “The provisions of Specification 3.0.3 are not applicable.” The corresponding ITS LCO 3.3.6 Actions do not include a provision stating that Specification 3.0.3 is not applicable. The CTS is revised to conform to the ITS. This changes the CTS Actions by deleting the provision that states the exception to LCO 3.0.3.	Actions	3.9.9 Action
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.6	Unit 2 only. CTS 3.9.9 Action requires the purge and exhaust system penetrations to be isolated when the isolation system is inoperable. The corresponding ITS 3.3.6 Actions offer an alternative to isolating the penetrations. ITS 3.3.6 Required Action B.2 allows the Required Actions of ITS 3.9.3 to be applied in lieu of isolating the affected penetrations. The alternate Action provided by ITS 3.9.3 requires that fuel movement involving recently irradiated fuel be suspended immediately. The CTS Actions are revised to conform to the ITS Actions. This changes the CTS Actions by adding the alternate Action to suspend fuel movement involving recently irradiated fuel immediately.	Action B.2	3.9.9 Action
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.7	Unit 2 only. CTS surveillance 4.9.9 requires, in part, the verification of containment purge and exhaust isolation by manual actuation. The corresponding ITS surveillance SR 3.3.6.3 specifies a Trip Actuating Device Operational Test (TADOT) instrument test for the manual action verification. The ITS TADOT SR includes a note that states, "verification of setpoint is not required." The CTS requirement for manual actuation verification is revised consistent with the ITS SR 3.3.6.3. This changes the CTS by specifying the defined (in Section 1.0 of the ITS) instrumentation test requirement (i.e., the TADOT) for the required	SR 3.3.6.3	4.9.9

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		manual actuation test. In addition, the proposed change includes the ITS SR Note excepting the verification of a setpoint in the surveillance.		
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.8	Unit 2 only. CTS 3.9.9 contains the requirements for the containment purge and exhaust isolation system. The CTS surveillance 4.9.9 contains requirements to verify the required valve actuations. CTS 3.3.3.1 contains the requirements for the radiation monitors associated with the containment purge and exhaust isolation system. The corresponding ITS 3.3.6 contains a more complete set of containment purge and exhaust isolation system requirements. ITS 3.3.6 includes the manual valve actuation requirement as well as the requirements for the radiation monitors associated with the containment purge and exhaust isolation system. The additional radiation monitor requirements include the Channel Check, Channel Operational Test, and Channel Calibration surveillance requirements associated with the radiation monitors. CTS 3.9.9 is revised to incorporate the associated radiation monitor surveillance requirements consistent with ITS 3.3.6.	Surveillances	4.9.9
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.9	Unit 2 only. CTS LCO 3.3.3.1 states “The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits.” CTS Table 3.3-6 requires for noble gas and effluent process monitor instrument for containment purge exhaust to be OPERABLE with 2 channels with a trip setpoint listed. The corresponding ITS LCO 3.3.6 states “The Containment Purge and Exhaust Isolation instrumentation for each Function in Table 3.3.6-1 shall be OPERABLE.” ITS Table 3.3.6-1 requires the Containment Radiation Monitor to be OPERABLE with 2 required channels and lists the setpoint for the required instruments. The CTS is revised to conform to the ITS. This changes the CTS by re-organizing the containment purge and exhaust isolation instrumentation into a single TS (ITS 3.3.6).	3.3.6	3.3.3.1, Table 3.3-6
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.10	Unit 2 only. CTS 3.3.3.1 Action c states, “The provisions of Specification 3.0.3 are not applicable.” The corresponding ITS LCO 3.3.6 Actions do not include a provision stating that Specification 3.0.3 is not applicable. The CTS is revised to conform to the ITS. This changes the CTS Actions by deleting the provision that states the exception to LCO 3.0.3.	Actions	3.3.3.1, Action c
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.11	Unit 2 only. CTS surveillance 4.3.3.1 is applicable to the containment purge and exhaust isolation radiation monitor channels. The CTS surveillance states, "Each radiation monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-3." The corresponding ITS surveillance requirements consist of a separate surveillance number for each requirement listed in CTS 4.3.3.1 (i.e., SR 3.3.6.1 & SR 3.3.6.2 & SR 3.3.6.4). ITS Table 3.3-6 continues to identify the required surveillance for each instrument function (by individual number) similar to CTS Table 4.3-3 which uses the CTS defined test terms for the surveillance. The CTS is revised to conform to the ITS. This changes the CTS by reformatting the presentation of the surveillance requirements applicable to the	SR 3.3.6.1, SR 3.3.6.2 & SR 3.3.6.4	4.3.3.1, Table 4.3-3

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		containment purge and exhaust isolation radiation monitoring channels.		
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.12	Unit 2 only. The CTS Table 3.3-6 table heading titled “Minimum Channels Operable” is revised to be “Required Channels” consistent with the corresponding ISTS Table 3.3.6-1 Table headings. In addition, the Minimum Channels Operable column of CTS Table 3.3-6 is deleted consistent with the content of the corresponding ISTS Table 3.3.6-1.	Table 3.3.6-1	Table 3.3-6
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.13	Unit 2 only. CTS Table 4.3-3 contains the surveillance requirements for the Containment Purge and Exhaust isolation Radiation Monitors. CTS Table 4.3-3 specifies a Channel Functional Test for the Radiation Monitors. In place of the Channel Functional Test ITS SR 3.3.6.2 specifies a Channel Operational Test (COT). The CTS is revised to replace the single Channel Functional Test requirement with the new ISTS defined test requirement (i.e., COT).	SR 3.3.6.2	Table 4.3-3
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	A.14	Unit 2 only. CTS 3.9.9 Action specifies that “With the containment purge and exhaust system inoperable….” The corresponding ITS 3.3.6 Actions are based on the individual instrument Functions associated with the Containment Purge and Exhaust isolation system. In addition, the ITS Actions are modified by a Note, which states “Separate Condition entry is allowed for each Function.” The CTS is revised to be consistent with the ISTS. This changes the CTS by the addition of the ISTS note allowing separate condition entry for each inoperable instrument Function.	Actions Note	3.9.9 Actions
ITS 3.3.7 CTS 3.3.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.7	3.3.3.1
ITS 3.3.7 CTS 3.3.3.1	A.2	CTS LCO 3.3.3.1states “The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits.” ITS LCO 3.3.7 states “The Control Room Emergency Ventilation System (CREVS) actuation instrumentation for each Function in Table 3.3.7-1 shall be OPERABLE.” The CTS Applicability references Table 3.3-6 and the corresponding ITS Applicability references Table 3.3.7-1. The CTS is revised to conform to the ITS. This changes the CTS by stating the LCO and Applicability requirements in the ITS format.	3.3.7 LCO & Applicability	3.3.3.1 LCO & Applicability
ITS 3.3.7 CTS 3.3.3.1	A.3	CTS 3.3.3.1 Action "b" states "With one or more radiation monitoring channels inoperable, take the ACTION shown in Table 3.3-6." ITS 3.3.7 does not have a corresponding Action. The ITS Actions are not shown on a table. The CTS is revised to conform to the presentation of the ITS Actions. This changes the CTS by eliminating Action "b."	NA	Action b

Table A
Administrative Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.7 CTS 3.3.3.1	A.4	CTS LCO 3.3.3.1 Action "c" states “The provisions of Specification 3.0.3 are not applicable.” The corresponding ITS 3.3.7 does not include a similar provision taking exception to Specification 3.0.3. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the exception to Specification 3.0.3.	NA	Action c
ITS 3.3.7 CTS 3.3.3.1	A.5	CTS 3.3.3.1 contains the Actions for inoperable radiation monitoring instrument functions. The CTS 3.3.3.1 Actions address more than one radiation monitoring function. ITS 3.3.7 contains the radiation monitoring requirements for the Control Room Emergency Ventilation System (CREVS) Actuation Instrumentation. The ITS Actions are modified by a note that states “Separate Condition entry is allowed for each Function.” This changes the CTS by adding a Note for ITS LCO Actions that specifically state each Function is allowed separate condition entry.	Actions Note	Actions
ITS 3.3.7 CTS 3.3.3.1	A.6	CTS Surveillance Requirement 4.3.3.1 states “Each radiation monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-3.” ITS LCO 3.3.7 specifies the Surveillance Requirements applicable to each instrument function in Table 3.3.7-1. ITS 3.3.7 contains a note for the SRs that states “Refer to the Table 3.3.7-1 to determine which SRs apply for each CREVS Actuation Function.” The CTS is revised to conform to the ISTS. This changes the CTS by replacing surveillance 4.3.3.1 with the ISTS note directing the user to the appropriate Table.	Table 3.3.7-1 & SR Note	4.3.3.1
ITS 3.3.7 CTS 3.3.3.1	A.7	The CTS Table 3.3-6 table heading titled “Minimum Channels Operable” is revised to be “Required Channels” consistent with the corresponding ISTS Table 3.3.7-1 Table headings. In addition, the Minimum Channels Operable column of CTS Table 3.3-6 is deleted consistent with the content of the corresponding ISTS Table 3.3.7-1.	Table 3.3.7-1	Table 3.3-6
ITS 3.3.7 CTS 3.3.3.1	A.8	CTS Table 4.3-3 contains the surveillance requirements for the control room radiation monitors. CTS Table 4.3-3 specifies a Channel Functional Test for the radiation monitors. In place of the Channel Functional Test ITS SR 3.3.7.2 specifies a Channel Operational Test (COT). The CTS is revised to replace the single Channel Functional Test requirement with the new ISTS defined test requirement (i.e., COT).	SR 3.3.7.2	Table 4.3-3 CFT
ITS 3.3.7 CTS 3.3.3.1	A.9	Unit 1 only. The CTS 3.3.3.1 Channel Functional Test requirement for the control room area radiation monitors is modified by footnote ###. The footnote states "Control Room intake and exhaust isolation dampers are not actuated." The corresponding ITS 3.3.7 Channel Operational Test is not modified by this note. The CTS is revised to conform to the ITS. This changes the CTS by eliminating the ### footnote.	NA	### footnote
ITS 3.3.8	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications	3.3.8	3.3.1.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.1.1		(CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.3.8 CTS 3.3.1.1	A.2	CTS LCO 3.3.1.1 requires the reactor trip system (RTS) instrumentation channels of Table 3.3-1 shall be OPERABLE. For Function 6.b, the CTS Table specifies the channels required to trip as zero. The corresponding ITS LCO 3.3.8, “Boron Dilution Detection Instrumentation” specifies one Source Range channel operable. The ITS does not describe the number of channels required to trip but the number of channels required operable. The CTS is revised to conform to the ITS. This changes the CTS by deleting the number of channels to trip from Table 3.3-1.	NA	Table 3.3-1, 6.b
ITS 3.3.8 CTS 3.3.1.1	A.3	CTS LCO 3.3.1.1 requires the reactor trip system (RTS) instrumentation channels of Table 3.3-1 shall be OPERABLE. RTS Function 6.b Source Range Neutron Flux on Table 3.3-1 requires a minimum of one Source Range channel to be OPERABLE. ITS LCO 3.3.8 “Boron Dilution Detection Instrumentation” requires one Source Range instrument channel to be OPERABLE. The CTS is revised to conform to the ITS. This changes the CTS by moving the Source Range instrumentation minimum channel operable requirement from the RTS Functions on Table 3.3-1 to the new ITS 3.3.8.	3.3.8 LCO	Table 3.3-1, 6.b
ITS 3.3.8 CTS 3.3.1.1	A.4	Unit 2 only. Unit 2 CTS Table 3.3.1 Function 6 specifies the Source Range Neutron Flux requirements. The Unit 2 requirements are modified by Note (8) that states “Alternate detectors may only be used for monitoring purposes Without Rod Withdrawal Capability until detector functions are modified to permit equivalent alarm and trip functions.” The corresponding ITS LCO 3.3.8 does not contain a similar note. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the portion of the note that states " until detector functions are modified to permit equivalent alarm and trip functions."	NA	Table 3.3-1, Note 8
ITS 3.3.8 CTS 3.3.1.1	A.5	CTS LCO 3.3.1.1 requires the reactor trip system (RTS) instrumentation channels of Table 3.3-1 shall be OPERABLE. CTS Table 3.3-1 Function 6.b, Source Range Neutron Flux, requires a minimum of one Source Range channel to be OPERABLE. For an inoperable Source Range channel CTS Action 5 must be entered. The Action requires the suspension of operations involving positive reactivity additions, closing of the unborated water source isolation valves within 1 hour, and performing Shutdown Margin (SDM) verification within 1 hour and once per 12 hours thereafter. The corresponding ITS LCO 3.3.8 “Boron Dilution Detection Instrumentation” Condition A.1 specifies an alternate Action (A.2.1) within the 1 hour allowed by the CTS to close unborated water source isolation valves. The alternate ITS Action A.2.1 provides the option to restore the inoperable Source Range channel to operable status within 1 hour instead of closing the unborated water source isolation valves. The CTS Actions are revised to conform to the ITS. This changes the CTS by providing an alternate Action to closing the unborated water source isolation valves.	Action A	Action 5

Table A
Administrative Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.8 CTS 3.3.1.1	A.6	CTS Table 3.3-1 for Function 6.b Source Range Neutron Flux requires a minimum of one channel to be operable and specifies that Action 5 is applicable. CTS Action 5 in part states "With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement…." The corresponding ITS LCO 3.3.8, "Boron Dilution Detection Instrumentation," states that "One Source Range channel shall be OPERABLE." ITS Condition A applies when the required channel is inoperable. The CTS Action is revised to conform to the ITS Action. This changes the CTS by reformatting the Action requirements consistent with the ISTS presentation of Actions.	Action A	Action 5
ITS 3.3.8 CTS 3.3.1.1	A.7	CTS Action # 5.c references Surveillance Requirements 4.1.1.1.1 or 4.1.1.2, as applicable to determine Shutdown Margin. The corresponding ITS Required Action A.2.2.2 only references a single surveillance (SR 3.1.1.1) to determine Shutdown Margin. The CTS is revised to conform to the ITS. This changes the CTS Action by only referencing a single surveillance instead of two surveillances for determining Shutdown Margin.	Action A.2.2.2	Action 5.c
ITS 3.3.8 CTS 3.3.1.1	A.8	CTS Table 4.3-1 contains the surveillance requirements for the affected Source Range instrumentation (Function 6b). In addition to specifying the surveillance requirements, the CTS Table also repeats the list of Functions and the applicable Modes for each Function. CTS Table 4.3-1 specifies a Channel Calibration on a refueling (18 month) frequency and a Channel Check every shift or 12 hours. The corresponding ITS 3.3.8 surveillance requirements (Channel Calibration and Channel Check) are not listed in a table format. The ITS 3.3.8 surveillances are presented in the standard format without using a Table. The CTS is revised to conform to the ITS. This changes the CTS by eliminating Table 4.3-1 for the affected Source Range instrument function surveillances.	NA	Tabl 4.3-1

Table A
Administrative Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.2 CTS 3.3.2.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.2	3.3.2.1
ITS 3.3.2 CTS 3.3.2.1	A.2	The CTS surveillance requirements 4.3.2.1.1, 4.3.2.1.2 and 4.3.2.1.3 contain the overall surveillance requirements for the ESFAS instrument functions. In addition to the general requirements specified above, CTS Table 4.3-2 contains the specific surveillance tests associated with each ESFAS instrument function. CTS Table 4.3-2 is a separate Table for surveillance requirements that duplicates much of the information already presented for each ESFAS function in CTS Table 3.3-3. The ISTS does not include general instrument surveillance requirements that correspond to CTS 4.3.2.1.1, 4.3.2.1.2, and 4.3.2.1.3. The ISTS lists the surveillance requirements by number that are applicable to each ESFAS instrument function on one master Table (ISTS 3.3.2-1). The single ISTS Table 3.3.2-1 contains all the requirements for each ESFAS function. The CTS surveillance requirement presentation is revised to conform to the ISTS. This changes the CTS by eliminating the general surveillance requirements 4.3.2.1.1, 4.3.2.1.2, and 4.3.2.1.3 and the separate Surveillance Table (4.3-2).	Table 3.3.2-1	4.3.2.1.1, 4.3.2.1.2, 4.3.2.1.3, and Table 4.3-2
ITS 3.3.2 CTS 3.3.2.1	A.3	CTS surveillance 4.3.2.1.3 requires that response time testing be performed on the ESFAS Functions and specifies that the testing be performed on "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 ESF function as shown in the "Total No. of Channels" column of Table 3.3-3". The corresponding ISTS surveillance for response time testing requires that the testing be performed on a "Staggered Test Basis". The CTS is revised to conform to the ISTS. This changes the CTS by replacing the explanation of how each channel must be tested with a simple reference to the TS defined term of "Staggered Test Basis". This change also includes the editorial revisions made to the corresponding Unit 1 response time testing surveillance (not shown) to change the Unit 1 CTS wording from “tested” to the more common ISTS descriptive term “verified” which is also consistent with the corresponding Unit 2 surveillance.	Defined Term	4.3.2.1.3
ITS 3.3.2 CTS 3.3.2.1	A.4	The column headings for Functional Unit, Applicable Mode, and Action in CTS Table 3.3-3 are revised to conform to the corresponding column headings in ISTS Table 3.3.2-1. In the ISTS, the corresponding column headings are Function, Applicable Mode or Other Specified Condition, and Condition.	Table 3.3.2-1	Table 3.3-3
ITS 3.3.2 CTS 3.3.2.1	A.5	The CTS Table 3.3-3 table heading titled “Total Number of Channels” is revised to be “Required Channels” consistent with the corresponding ISTS Table 3.3.2-1 Table headings. In addition, the Minimum Channels Operable column of CTS Table 3.3-3 is deleted consistent with the content of the corresponding ISTS Table 3.3.2-1.	Table 3.3.2-1	Table 3.3-3

Table A
Administrative Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.3.2 CTS 3.3.2.1	A.6	The CTS Table 3.3-3 Allowable Value column title is revised by the addition of Unit specific designations. The corresponding ISTS Table does not include Unit specific designations. However, the BVPS specific implementation of the ISTS includes both Unit 1 and Unit 2 requirements in one set of TS. As each BVPS Unit may have different setpoints, the resulting BVPS ITS Table 3.3.2-1 is proposed with separate Unit 1 and Unit 2 Allowable Valve columns for each ESFAS function.	Table 3.3.2-1	Table 3.3-3
ITS 3.3.2 CTS 3.3.2.1	A.7	CTS Table 3.3-3 and 4.3-2 contain the Loss of Power ESFAS Function number 6. This Function addresses the undervoltage and degraded voltage instrumentation associated with the emergency buses. The corresponding ISTS ESFAS Table 3.3.2-1 does not contain the TS requirements for this instrumentation. In the ISTS, the TS requirements for the undervoltage and degraded voltage instrumentation are located in ISTS 3.3.5 not ISTS 3.3.2. The CTS is revised to conform to the ISTS. This changes the CTS by moving the TS requirements for this instrumentation from the ESFAS TS into a separate TS, ITS 3.3.5. ITS LCO 3.3.5 is a separate TS that is intended to address the requirements for undervoltage and degraded voltage instrumentation. This change includes the movement of all requirements for this instrumentation including the Actions (#33 and #34) and the surveillance requirements on Table 4.3-2.	3.3.5	Table 3.3-3 and 4.3-2
ITS 3.3.2 CTS 3.3.2.1	A.8	CTS Function 1.1, SAFETY INJECTION-TRANSFER FROM INJECTION TO THE RECIRCULATION MODE, is revised to be more consistent with the ISTS. The CTS Function title is revised to "Automatic Switchover to Containment Sump". The Safety Injection coincidence of the Function is moved to a separate line item. In addition, the Function is renumbered from 1.1 to 7. These changes revise the presentation of this ESFAS Function to be more consistent with the ISTS.	Function 7	Function 1.1
ITS 3.3.2 CTS 3.3.2.1	A.9	The Allowable Values specified for the CTS Functional Unit 1.e and Functional Unit 4.d (Steamline Pressure-Low) on Table 3.3-2 are modified by a * footnote that specifies the time constants associated with the Allowable Value. In addition to the time constants (which are part of the Allowable Value) the footnote also specifies that "Channel Calibration shall ensure that these time constants are adjusted to those values." The corresponding ISTS Functions in CTS Table 3.3.2-1 do not include footnotes with requirements for the channel calibration of the function. The ISTS includes the requirement to verify the time constants associated with a Function in the Channel Calibration Surveillance Requirement for that Function. The ISTS includes notes in the channel calibration surveillance that clarify or modify the requirements for that surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by moving the note affecting channel calibration from the list of functions on CTS Table 3.3-2 into the ESFAS channel calibration surveillance requirement.	Channel Calibration SR Note	Functional Unit 1.e and 4.d footnote
ITS 3.3.2	A.10	The number of manual initiation instrumentation channels for the Containment Spray, Phase B Isolation, and Steam Line Isolation (Unit 2 only) ESFAS Functions are identified	Table 3.3.2-1 Manual Functions	Table 3.3-3 Manual Functions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.3.2.1		as "2 sets (2 switches per set)". In the ISTS, the number of channels for manual Functions that utilize dual initiation switches in two sets are identified as "2 per train, 2 trains". The CTS is revised to conform to the ISTS nomenclature. This changes the CTS by more clearly identifying the actuation train A and B relationship of the manual ESFAS instrument channels.		
ITS 3.3.2 CTS 3.3.2.1	A.11	The CTS steam pressure Functions for steam line isolation consist of Functions 4d and 4e. The corresponding ISTS Functions are organized as Functions 4.d.1 and 4.d.2. The CTS is revised to conform to the ISTS. This changes the CTS by re-organizing the steam pressure Functions under a common Function number (4.d).	Table 3.3.2-1, Function 4.d	Table 3.3-3, Functions 4.d.1 & 4.d.2
ITS 3.3.2 CTS 3.3.2.1	A.12	The CTS AFW ESFAS Function is modified by Note 3. The CTS Note provides an explanation that the AFW pump manual initiation is included in the plant systems TS for the AFW pumps. The corresponding ISTS AFW ESFAS Function does not include this Note. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the explanation provided by the CTS note.	Table 3.3.2-1, AFW Function	Table 3.3-3, AFW Function, Note 3
ITS 3.3.2 CTS 3.3.2.1	A.13	The number of channels for several CTS ESFAS Functions for Actuation Logic and relays and the P-4 interlock are simply specified as 2 channels. The corresponding ISTS Functions are specified in terms of "trains". The CTS is revised to conform to the ISTS terminology for these Functions. This changes the CTS by identifying the ESFAS Train A and B relationship of certain Functions required operable in the TS.	Table 3.3.2-1, Functions	Table 3.3-3, Functions
ITS 3.3.2 CTS 3.3.2.1	A.14	The CTS main steam line isolation negative steam line pressure rate high Function is required operable in Mode 3. The CTS Mode 3 Applicability is modified by Note (2). Note (2) states that the trip function is automatically bypassed above P-11 and is bypassed below P-11 when Safety Injection on low steam pressure is not manually bypassed. The corresponding ISTS ESFAS Function is also modified by a Note that states that the Function is required operable in Mode 3 below the P-11 (Pressurizer Pressure) interlock. The CTS Note is revised to conform more closely to the ISTS Note. The proposed ITS Note states that the Function is required operable "Below the P-11 (Pressurizer Pressure) interlock when SI on steam line pressure low is blocked. This changes the CTS by stating the Applicability more clearly in terms of when the affected Function is required operable. The references to bypassing Functions in the CTS Note are eliminated (consistent with the ISTS) and the Note is made to address the corresponding operability requirements (i.e., when the Function may not be bypassed).	Table 3.3.2-1, Applicability Note for Main Steam Isolation Function (Negative Steam line Pressure Rate High Function)	Table 3.3-3, Applicability Note (2)
ITS 3.3.2 CTS 3.3.2.1	A.15	The CTS Actions specify "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement…." or "With the number of channels OPERABLE one less than required by the Total Channels OPERABLE requirement…." These CTS Actions are based on the minimum channels operable or total channels specified in CTS Table 3.3-3 for each ESFAS Function. The ISTS does not contain a "minimum channels operable" or "total channels" requirement. The ISTS uses the single term	Table 3.3.2-1, Required Channels & Trains	Table 3.3-3, Minimum & Total # of Channels

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		"Required" channels or trains for all ESFAS Functions. In the ISTS, all Actions are based on one or more "Required" channels or trains inoperable. The ISTS Required Channels is equivalent to the CTS Total Channels requirement. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the Action references to the Minimum or Total channels operable and simply specifying "one channel inoperable". In addition, the ISTS Action Conditions may identify the ESFAS Function by "train" instead of by "channel" where applicable (e.g., the automatic actuation logic and Actuation Relays Function is not a channel and is referred to by the more accurate train designation).		
ITS 3.3.2 CTS 3.3.2.1	A.16	The CTS Actions provide the allowance that "one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1.1…." The corresponding ISTS Action Condition C Note states that "one channel may be bypassed for up to 4 hours for surveillance testing." The CTS is revised to conform to the ISTS Condition Note. This changes the CTS by eliminating the reference to Specification 4.3.2.1.1 from the affected CTS Actions.	Action C, Note	Table 3.3-3 Actions
ITS 3.3.2 CTS 3.3.2.1	A.17	The CTS ESFAS TS contains a separate Table (4.3-2) that contains the surveillance requirements associated with each ESFAS Function. In addition to the ESFAS Function surveillance requirements, CTS Table 4.3-2 contains a list of the ESFAS Functions and the Applicable Modes for each ESFAS Function. The List of Functions and Applicable Modes in CTS Table 4.3-2 is essentially redundant to the list of ESFAS Functions and Applicable Modes in CTS Table 3.3-3. In order to simplify and consolidate the ESFAS Function requirements, the corresponding ISTS for ESFAS presents all the ESFAS requirements in a single Table (3.3.2-1). ISTS Table 3.3.2-1 contains a single list of ESFAS Functions and a single list of Applicable Modes for each Function. The CTS is revised to conform to the ISTS. This changes the CTS by consolidating CTS Tables 3.3.3 and 4.3.2 into a single Table (ITS 3.3.2-1).	Table 3.3.2-1	Tables 3.3-3 & 4.3-2
ITS 3.3.2 CTS 3.3.2.1	A.18	CTS Table 4.3-2 contains the surveillance requirements for the ESFAS Functions. The CTS specifies a Channel Functional Test for certain ESFAS Functions. In place of the Channel Functional Test, the ISTS specifies the following surveillance tests depending on the Function: Channel Operational Test (COT), Trip Actuating Device Operational Test (TADOT), Actuation Logic Test, Master Relay Test, and Slave Relay Test. The CTS is revised to replace the single Channel Functional Test requirement with the new ISTS defined test requirements.	Table 3.3.2-1 SRs	Table 4.3-2 SRs
ITS 3.3.2 CTS 3.3.2.1	A.19	CTS surveillance 4.3.2.1.3 requires that "The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESF function shall be demonstrated to be within its limit…." The CTS surveillance is a general requirement that is interpreted to be applicable to those ESFAS Functions with response time limits assumed in the safety analyses. The ISTS provides a specific response time surveillance requirement that is assigned to each ESFAS Function that has required response time limits. The CTS is revised to conform to the ISTS. This changes the CTS by assigning a response time surveillance requirement to	SR 3.3.2.9	4.3.2.1.3

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		each individual ESFAS Function that has a required response time limit identified in the LRM.		
ITS 3.3.2 CTS 3.3.2.1	A.20	CTS Note 1 in Table 4.3-2 is applicable to the monthly frequency specified for the Automatic Actuation Logic Function. CTS Note 1 specifies that each train or logic channel shall be tested at least every other 31 days. The corresponding ITS surveillances for the automatic actuation logic Function (SR 3.3.2.2 and SR 3.3.2.3) specify that the surveillance be performed every 31 days on a Staggered Test Basis. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating Table 4.3-2 Note 1 and replacing the Note with a surveillance Frequency that specifies the surveillance be performed on a "Staggered Test Basis".	SR 3.3.2.2 and SR 3.3.2.3	Table 4.3-2, Note 1
ITS 3.3.2 CTS 3.3.2.1	A.21	Unit 1 only. The Unit 1 CTS allowable value for the steam line pressure Function specifies the pressure with the description that the pressure is steam line pressure. The corresponding ISTS (and Unit 2) allowable values simply specify the required pressure. The Unit 1 CTS is revised to conform to the ISTS (and Unit 2 CTS). This changes the Unit 1 CTS by eliminating the description of the specified pressure as steam line pressure.	Table 3.3.2-1 Allowable Value	Table 3.3-3, Allowable Value
ITS 3.3.2 CTS 3.3.2.1	A.22	Unit 1 only. The Unit 1 CTS ESFAS Function 7a, Steam Generator (SG) Water Level - Low - Low, start of the AFW pumps is modified by reference to a "Loop Stop Valves Open" permissive. The corresponding ISTS and Unit 2 CTS ESFAS Functions do not contain a similar reference. The Unit 1 CTS is revised to conform to the ISTS and Unit 2 CTS. This changes the Unit 1 ESFAS Function 7a by deleting the reference to the "Loop Stop Valves Open" permissive.	Table 3.3.2-1, SG Water Level Low-Low AFW Function	Table 3.3-3 Function 7a

Table A
Administrative Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.4.1 CTS 3.2.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.1	3.2.5
ITS 3.4.1 CTS 3.2.5	A.2	CTS surveillance 4.2.5.2 requires the RCS total flow to be determined by measurement. The corresponding ISTS surveillance (SR 3.4.1.4) specifies that the RCS flow be verified by precision heat balance. The CTS is revised to conform to the ISTS. This changes the CTS surveillance by including the requirement for a specific kind of measurement to be performed.	SR 3.4.1.4	4.2.5.2
ITS 3.4.2 CTS 3.1.1.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.2	3.1.1.5
ITS 3.4.2 CTS 3.1.1.5	A.2	CTS 3.1.1.5 Action requires that Tavg be restored within the specified time or that the plant be placed in HOT STANDBY." ISTS 3.4.2, Action A, requires that Tavg be restored within the specified time or that the plant be placed in MODE 2 with Keff < 1.0. The CTS is revised to conform to the ISTS. This changes the CTS requirement to enter HOT STANDBY to enter MODE 2 with Keff < 1.0.	Action A	Action
ITS 3.4.2 CTS 3.1.1.5	A.3	CTS 3.1.1.5 Action requires that with a Reactor Coolant System operating loop temperature, T_{avg}, less than 541 °F, restore T_{avg} to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes. The CTS allows a 30 minute interval until the plant must be removed from the TS applicability. The Corresponding ISTS 3.4.2, Action A, simply requires that with T_{avg} in one or more RCS loops not within limit, the plant be removed from the applicable Mode within 30 minutes. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the intermediate requirement to restore T_{avg} to within its limit within 15 minutes.	Action A	Action
ITS 3.4.2 CTS 3.1.1.5	A.4	CTS 3.1.1.5 Applicability is modified by a footnote, designated with an asterisk, which states, "See Special Test Exception 3.10.3." ISTS 3.4.2 does not contain this reference. The CTS is revised to conform to the ISTS and the asterisk footnote is deleted.	NA	Applicability Footnote
ITS 3.4.4 CTS 3.4.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain	3.4.4	3.4.1.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.4.5 CTS 3.4.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.5	3.4.1.2
ITS 3.4.5 CTS 3.4.1.2	A.2	CTS 3.4.1.2 Action statement b provides the required Actions that are applicable when the rod control system is capable of control bank rod withdrawal but does not clearly state the condition for which the Action is applicable. The corresponding ISTS Action Condition is identified as being applicable when the "Rod Control System is capable of rod withdrawal". The CTS is revised to conform to the ISTS. This changes the CTS by clearly identifying the CTS Action statement as applicable when the Rod Control System is capable of rod withdrawal.	Actions	Action b
ITS 3.4.5 CTS 3.4.1.2	A.3	CTS 3.4.1.2 Action statement b provides the requirements applicable when the required RCS loops are not in operation and the Rod Control System is capable of rod withdrawal. The CTS Action specifies that the Rod Control System be aligned so that it is incapable of rod withdrawal. The corresponding ISTS Action provides an alternative Action to restore the required RCS Loop to operation. The CTS is revised to conform to the ISTS. This changes the CTS by providing an alternate Action to restore an RCS loop to operation in lieu of aligning the Rod Control System so that it is incapable of rod withdrawal.	Actions	Action b
ITS 3.4.5 CTS 3.4.1.2	A.4	CTS 3.4.1.2 Action statement b provides the requirements applicable when the required RCS loops are not in operation and the Rod Control System is capable of rod withdrawal. The CTS Action specifies that the control rod drive mechanisms be de-energized or the rod control system be aligned so that it is incapable of control bank withdrawal. The corresponding ISTS Action specifies only that the Rod Control System be placed in a condition incapable of rod withdrawal. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the CTS alternate Action to de-energize all control rod drive mechanisms.	Actions	Action b
ITS 3.4.5 CTS 3.4.1.2	A.5	Not used.		
ITS 3.4.5 CTS 3.4.1.2	A.6	Unit 2 only. The CTS 3.4.1.2 double asterisk footnote to the Applicability provides a reference to Special Test Exception 3.10.4. The Test Exception provides an allowance to stop the RCS flow for hot rod drops in Mode 3. The corresponding ISTS requirements do	NA	** footnote

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		not contain references to Special Test Exceptions. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the reference to Special Test Exception 3.10.4. Unit 1 CTS 3.4.1.2 does not have a corresponding footnote.		
ITS 3.4.5 CTS 3.4.1.2	A.7	CTS 3.4.1.2 Action c provides the appropriate Actions for the condition of no RCS loops in operation. The CTS Action is revised to incorporate the requirement to immediately place the control rod system in a condition incapable of rod withdrawal consistent with the corresponding ISTS Action.	Actions	Action c
ITS 3.4.5 CTS 3.4.1.2	A.8	CTS surveillances 4.4.1.2.1 and 4.4.1.2.3 specify that the required RCS loops be verified in operation every 12 hours. The CTS utilizes a separate surveillance for each plant condition identified in LCO 3.4.1.2 (rod control system capable of rod withdrawal and rod control system not capable of rod withdrawal). The corresponding ISTS surveillance (SR 3.4.5.1) simply specifies that the required RCS loops be verified in operation every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by combining the two CTS surveillances used to verify RCS loops in operation.	SR 3.4.5.1	4.4.1.2.1, 4.4.1.2.3
ITS 3.4.6 CTS 3.4.1.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.6	3.4.1.3
ITS 3.4.6 CTS 3.4.1.3	A.2	CTS 3.4.1.3 specifies the requirements for RCS and RHR loops in Modes 4 and 5. The corresponding requirements in the ISTS are contained in three different LCOs. The corresponding ISTS requirements are in LCO 3.4.6, RCS Loops - Mode 4, LCO 3.4.7, RCS Loops - Mode 5, Loops filled, and LCO 3.4.8, RCS Loops Mode 5, Loops Not Filled. The ISTS divides Mode 5 into two separate conditions. In one condition (RCS loops filled) the RCS loops are available for decay heat removal. In the second Mode 5 condition (loops not filled) the RCS loops are no longer available for decay heat removal. The CTS is revised to conform to the ISTS with some modification to account for the use of the BVPS RCS loop isolation valves. This changes the CTS by dividing the single Mode 4 and 5 LCO into 3 separate LCOs consistent with the ISTS LCOs listed above.	3.4.6, 3.4.7, 3.4.8 LCOs	LCO
ITS 3.4.6 CTS 3.4.1.3	A.3	The CTS 3.4.1.3 LCO requirement for operable RHR loops is modified by footnote (3) that specifies that the normal or emergency power source may be inoperable in MODE 5. The corresponding ISTS 3.4.6 LCO is not modified by a similar note. The CTS is revised to conform the ISTS. This changes the CTS by eliminating the provision contained in the footnote from the CTS.	NA	footnote 3
ITS 3.4.6	A.4	CTS 3.4.1.3 footnote 4 references two separate specifications for Shutdown Margin	Note	footnote 4

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.4.1.3		requirements. The corresponding ISTS Note only references a single specification for shutdown margin requirements. The CTS note is revised to conform to the ISTS. This changes the CTS by referencing a single Specification for shutdown margin requirements.		
ITS 3.4.7 CTS 3.4.1.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.7	3.4.1.3
ITS 3.4.7 CTS 3.4.1.3	A.2	CTS 3.4.1.3 specifies the requirements for RCS and RHR loops in Modes 4 and 5. The corresponding requirements in the ISTS are contained in three different LCOs. The corresponding ISTS requirements are in LCO 3.4.6, RCS Loops - Mode 4, LCO 3.4.7, RCS Loops - Mode 5, Loops filled, and LCO 3.4.8, RCS Loops Mode 5, Loops Not Filled. The ISTS divides Mode 5 into two separate conditions. In one condition (RCS loops filled) the RCS loops are available for decay heat removal. In the second Mode 5 condition (loops not filled) the RCS loops are no longer available for decay heat removal. The CTS is revised to conform to the ISTS with some modification to account for the use of the BVPS RCS loop isolation valves. This changes the CTS by dividing the single Mode 4 and 5 LCO into 3 separate LCOs consistent with the ISTS LCOs listed above.	3.4.6, 3.4.7, 3.4.8 LCOs	LCO
ITS 3.4.7 CTS 3.4.1.3	A.3	CTS 3.4.1.3 Action statement a states "With less than the above required loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status as soon as possible; be in COLD SHUTDOWN within 20 hours". The corresponding ISTS 3.4.7 Action Conditions A and B are similar except that the ISTS Actions do not require the unit be placed in Mode 5 (cold shutdown) in 20 hours. The ISTS Actions only specify that action be initiated to restore the required loops to operation and operable status. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the Action to place the unit in Mode 5.	Actions A & B	Action a
ITS 3.4.7 CTS 3.4.1.3	A.4	CTS 3.4.1.3 Action a requires that "With less than the above required loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status." The corresponding ISTS 3.4.7 Action Conditions A and B provide similar but more detailed instructions. The ISTS Action Conditions include all the combinations of inoperable loops given the options listed in the LCO. However, the ISTS Actions remain the same as the CTS i.e., to initiate action immediately to restore the required loops to operable status. The CTS Action is revised to conform to the ISTS Action. This changes the CTS by including Action Conditions that list the specific combinations of inoperable loops instead of simply referring to less than the required loops operable.	Actions A & B	Action a
ITS 3.4.7	A.5	CTS 3.4.1.3 is applicable in MODES 4 and 5 and allows any combination of two coolant	LCO	LCO

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.4.1.3		loops to satisfy the LCO. ISTS 3.4.7 is applicable in MODE 5 with the RCS loops filled and requires one RHR loop to be OPERABLE and in operation. ISTS 3.4.7 contains a Note which allows all RHR loops to be removed from operation during a planned heatup to MODE 4 when at least one RCS loop is in operation. The CTS is revised to conform to the ISTS.		
ITS 3.4.7 CTS 3.4.1.3	A.6	The CTS 3.4.1.3 LCO requirement for operable RHR loops is modified by a ** footnote that specifies that the normal or emergency power source may be inoperable in MODE 5. The corresponding ISTS 3.4.7 LCO is not modified by a similar note. The CTS is revised to conform the ISTS. This changes the CTS by eliminating the provision contained in the footnote from the CTS.	NA	** footnote
ITS 3.4.7 CTS 3.4.1.3	A.7	CTS 3.4.1.3 footnote 4 references two separate specifications for Shutdown Margin requirements. The corresponding ISTS Note only references a single specification for shutdown margin requirements. The CTS note is revised to conform to the ISTS. This changes the CTS by referencing a single Specification for shutdown margin requirements.	Note	footnote 4
ITS 3.4.8 CTS 3.4.1.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.8	3.4.1.3
ITS 3.4.8 CTS 3.4.1.3	A.2	CTS 3.4.1.3 specifies the requirements for RCS and RHR loops in Modes 4 and 5. The corresponding requirements in the ISTS are contained in three different LCOs. The corresponding ISTS requirements are in LCO 3.4.6, RCS Loops - Mode 4, LCO 3.4.7, RCS Loops - Mode 5, Loops filled, and LCO 3.4.8, RCS Loops Mode 5, Loops Not Filled. The ISTS divides Mode 5 into two separate conditions. In one condition (RCS loops filled) the RCS loops are available for decay heat removal. In the second Mode 5 condition (loops not filled) the RCS loops are no longer available for decay heat removal. The CTS is revised to conform to the ISTS with some modification to account for the use of the BVPS RCS loop isolation valves. This changes the CTS by dividing the single Mode 4 and 5 LCO into 3 separate LCOs consistent with the ISTS LCOs listed above.	3.4.6, 3.4.7, 3.4.8 LCOs	LCO
ITS 3.4.8 CTS 3.4.1.3	A.3	CTS 3.4.1.3 is applicable in Modes 4 and 5 and the LCO includes options to use RCS or RHR loops for decay heat removal. As plant conditions change, CTS 3.4.1.3 allows for different combinations of coolant loops to be used for decay heat removal. The CTS does not define the plant conditions that may exist in Mode 5 and does not specify the possible combination of coolant loops that are appropriate for each condition. The ISTS, however, defines two different operating conditions for Mode 5 and specifies the appropriate combination of coolant loops for each condition. The corresponding ITS LCOs (3.4.7, and	3.4.7 & 3.4.8 Applicability	Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		3.4.8) for Mode 5 have Applicabilities that divide Mode 5 operation into two different Modes. One Mode (ITS 3.4.7) requires that at least one RCS loop is available to provide decay heat removal. The other Mode 5 Applicability (ITS 3.4.8) is used when no RCS loops are available and only RHR is available for decay heat removal. The CTS is revised to adopt the ISTS convention of two Applicabilities in Mode 5. This changes the CTS LCO, Notes, Applicability, Actions, and surveillance requirements such that when no RCS loops are available for decay heat removal, the option to use RCS loops no longer appears in the TS.		
ITS 3.4.8 CTS 3.4.1.3	A.4	Not used.		
ITS 3.4.8 CTS 3.4.1.3	A.5	The CTS 3.4.1.3 LCO requirement for operable RHR loops is modified by footnote (3) that specifies the normal or emergency power source may be inoperable in MODE 5. The corresponding ISTS 3.4.8 LCO is not modified by a similar note. The CTS is revised to conform the ISTS. This changes the CTS by eliminating the provision contained in the footnote from the CTS.	NA	footnote 3
ITS 3.4.17 CTS 3.4.1.4.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.17	3.4.1.4.1
ITS 3.4.18 CTS 3.4.1.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.18	3.4.1.5
ITS 3.4.18 CTS 3.4.1.5	A.2	CTS 3.4.1.5 Applicability states " Whenever an RCS loop has been isolated greater than 4 hours or drained". The corresponding ISTS 3.4.18 Applicability is Modes 5 and 6. The CTS applicability is revised to conform to the ISTS. The revised CTS applicability reads "Modes 5 and 6." However, the operating flexibility provided by the CTS Applicability allowance to not consider a loop to be isolated for up to 4-hours is retained in a proposed Notes to the BVPS ITS 3.4.18 LCO and to BVPS ITS SR 3.4.18.3. The LCO 3.4.18 note states "An RCS loop is not considered isolated when one isolation valve is stroked for testing or maintenance provided the other isolation valve is maintained open." The note added to the BVPS ITS SR 3.4.18.3 (which requires that the boron concentration of an	Applicability, SRs	Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		isolated loop be verified prior to returning to service) states "Only required to be performed on RCS loops that have been isolated greater than 4 hours or drained." Although the CTS Applicability is revised consistent with the more restrictive ISTS Applicability, the proposed changes retain some of the operating flexibility inherent in the CTS Applicability.		
ITS 3.4.18 CTS 3.4.1.5	A.3	CTS 3.4.1.5 Applicability is modified by footnote 1. The CTS footnote states "With fuel in the vessel." The corresponding ISTS 3.4.18 applicability does not contain this footnote. The CTS is revised by deleting the footnote consistent with the ISTS.	NA	Applicability footnote 1
ITS 3.4.10 CTS 3.4.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.10	3.4.3
ITS 3.4.10 CTS 3.4.3	A.2	CTS 3.4.3 Action a specifies in part that the plant be in HOT SHUTDOWN with any RCS cold leg temperature ≤ the enable temperature specified in the PTLR and apply RCS overpressure protection requirements in accordance with Specification 3.4.9.3. The corresponding ISTS Action only requires that the plant be in Mode 4 with any RCS cold leg temperature ≤ the enable temperature specified in the PTLR. The CTS Action is revised to conform more closely to the ISTS Action. This changes the CTS by eliminating the reference to the over pressure protection requirements of Specification 3.4.9.3.	Actions	Action a
ITS 3.4.10 CTS 3.4.3	A.3	CTS surveillance 4.4.3 specifies that no additional requirements other than those required by Specification 4.0.5 are applied to the Pressurizer safety valves. A CTS footnote requires the valves to be within ± 1% of the setpoint after testing. The corresponding ITS surveillance (SR 3.4.10.1) requires verification that each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program. Following testing, lift settings shall be within ± 1%. The ISTS surveillance is required to be performed in accordance with the Inservice Testing Program. The CTS is revised to conform to the ISTS. This changes the CTS by making a direct reference to the Inservice Testing program instead of referencing the program through Specification 4.0.5 and including the ± 1% tolerance requirement in the surveillance.	SR 3.4.10.1	4.4.3
ITS 3.4.10 CTS 3.4.3	A.4	The ISTS 3.4.10 contains Actions for two or more safety valves inoperable. The ISTS requires the same shutdown Actions for two or more inoperable safety valves as are required for one inoperable valve if not restored within 15 minutes. The plant must be placed in Mode 3 in 6 hours and be in Mode 4 with any RCS cold leg temperature less than or equal to the enable temperature specified in the PTLR within 24 hours. The CTS does not contain any Actions for two or more safety valves inoperable. The CTS is revised to conform to the ISTS. This changes the CTS by providing Actions for two or more	Actions	Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		inoperable safety valves.		
ITS 3.4.9 CTS 3.4.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.4.9 CTS 3.4.4	A.2	The CTS 3.4.4 LCO requirement states that the pressurizer shall be operable with at least 150 kW of pressurizer heaters. The CTS Action is applicable with less than 150 kw of heaters supplied by an emergency bus. The corresponding ISTS LCO provides a more specific requirement that specifies two groups of heaters with the required kW capacity and capable of being powered from an emergency power supply. The CTS LCO and Actions are revised to be more consistent with the ISTS LCO and Action requirements. This revises the CTS LCO to specify two sets of heaters required operable with each set consisting of ≥ 150 kW capacity and powered from an emergency bus. The Action becomes applicable when one required set of heaters is inoperable.	LCO	LCO
ITS 3.4.9 CTS 3.4.4	A.3	The CTS 3.4.4 LCO requirement states that the pressurizer shall be operable with a steam bubble. The corresponding CTS Action for loss of steam bubble is applicable when the pressurizer is inoperable for reasons other than the required heaters. The corresponding ISTS LCO requirement specifies a maximum pressurizer level (92%) that assures a steam bubble is maintained within the pressurizer. The ISTS Action associated with this LCO requirement is applicable when the pressurizer level is not within the required limit. The CTS LCO and Action are revised to be consistent with the ISTS. This changes the CTS by specifying a maximum water level in the pressurizer (92%) instead of simply requiring a steam bubble and labeling the associated Action such that it specifically applies when the pressurizer water level is not within the limit instead of when the pressurizer is inoperable for other reasons.	LCO, Action	LCO, Action
ITS 3.4.13 CTS 3.4.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.13	3.4.5
ITS 3.4.13 CTS 3.4.5	A.2	CTS 4.4.5.1 states, "Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4.4-1." ITS SR 3.4.13.2 requires that the RCS operational leakage must	SR 3.4.12.2	4.4.5.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		be verified to be within limits in accordance with the Steam Generator Tube Surveillance Program. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating a separate TS for the steam generators (CTS 3.4.5) and revising the format and presentation of the requirements for the steam generators. The TS reference to the required testing is changed from CTS 3.4.5 to the Steam Generator Tube Inspection Program in the ITS Administrative Controls section of the TS.		
ITS 3.4.13 CTS 3.4.5	A.3	CTS 3.4.5 is applicable in Modes 1-4. The ISTS does not have a corresponding TS to CTS 3.4.5. The Steam Generator requirements in CTS 3.4.5 are retained in ISTS Surveillance 3.4.13.2 and Section 5.0, Administrative Controls. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating a separate TS and Applicable Modes for the steam generators and revising the format and presentation of the requirements for the steam generators.	SR 3.4.13.2 & Program in Section 5.0	3.4.5
ITS 3.4.13 CTS 3.4.5	A.4	CTS 3.4.5 Action states " With one or more steam generators inoperable, restore the inoperable generator(s) to OPERABLE status prior to increasing T_{avg} above 200°F." The ISTS does not contain an Action that corresponds to the CTS Action. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the CTS 3.4.5 Action.	NA	Action
ITS 3.4.15 CTS 3.4.6.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.15	3.4.6.1
ITS 3.4.15 CTS 3.4.6.1	A.2	CTS 4.4.6.1.a requires the "Performance of a CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST of the required containment atmosphere radioactivity monitor at the frequencies specified in Table 4.3-3." The corresponding ISTS specifies 3 separate surveillances for each of the tests identified in the CTS surveillance. In addition, the ISTS includes all the requirements for this instrumentation in the RCS Leakage Detection TS and does not reference another TS (Table 4.3-3) as does the CTS surveillance. The CTS is revised to conform to the ISTS. This changes the presentation of the surveillance requirements.	SRs	4.4.6.1.a
ITS 3.4.15 CTS 3.4.6.1	A.3	CTS Table 3.3-6 contains the Action (#20) applicable to the RCS leakage detection radiation monitors. The CTS Action # 20 references the applicable Actions of CTS 3.4.6.1, RCS Leakage Detection Instrumentation. The ISTS does not contain an instrument Table that corresponds to CTS Table 3.3-6. In the ISTS, all the RCS leakage detection instrument requirements are contained in ISTS 3.4.15 and no references between the TS are used. The CTS is revised consistent with the ISTS. This changes the CTS by eliminating Action #20 and consolidating all the RCS leakage detection instrumentation	NA	Table 3.3-6, Action 20

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		requirements in ITS 3.4.15.		
ITS 3.4.13 CTS 3.4.6.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.13	3.4.6.2
ITS 3.4.13 CTS 3.4.6.2	A.2	CTS 4.4.5.1 states, "Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4.4-1." In the ISTS, the SG tube surveillance requirements are referenced from ISTS 3.4.13, RCS Operational leakage. ISTS SR 3.4.13.2 requires that the RCS operational leakage must be verified to be within limits in accordance with the Steam Generator Tube Surveillance Program. The CTS is revised to conform to the ISTS. This changes the CTS by referencing the SG tube surveillance requirements from ITS SR 3.4.13.2. As such, a new surveillance is moved into the CTS requirements for RCS Operational Leakage from CTS 3.4.5.	SR 3.4.13.2	4.4.5.1
ITS 3.4.14 CTS 3.4.6.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.14	3.4.6.3
ITS 3.4.14 CTS 3.4.6.3	A.2	CTS 3.4.6.3 LCO requires that the RCS pressure isolation valves (PIVs) be operable. However, the CTS surveillances and Actions define the RCS PIVs operability as being within the leakage limits. The corresponding ISTS LCO requires the PIV leakage to be within limit. The CTS LCO is revised to be consistent with the ISTS LCO. This changes the CTS by more clearly defining the TS requirement for PIVs.	LCO	LCO
ITS 3.4.14 CTS 3.4.6.3	A.3	CTS 3.4.6.3 Action 1 specifies that " With any Reactor Coolant System Pressure Isolation Valve leakage greater than the limit…" the required Action must be initiated. The corresponding ISTS Action specifies that with "one or more flow paths with leakage from one or more RCS PIVs not within limit" Action must be initiated. The ISTS Action is also modified by a Note that states "separate Condition entry is allowed for each flow path." The CTS is revised to conform to the ISTS. This changes the CTS by revising the action to conform to the ISTS presentation and format of this type of Action.	Actions	Action 1
ITS 3.4.14	A.4	ISTS 3.4.14 contains ACTION Note 2 which states, “Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV.” The corresponding	Action Note 2	Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.4.6.3		CTS 3.4.6.3 does not specifically state a similar requirement. The CTS is revised to conform to the ISTS. This changes the CTS by adopting the ISTS Note that modifies the TS Actions.		
ITS 3.4.14 CTS 3.4.6.3	A.5	CTS 3.4.6.3 Action 1 specifies that the high pressure portion of the affected system must be isolated from the low pressure portion of the system. The corresponding ISTS Action contains a Note that requires that the valve used to satisfy the Action must be in the RCS pressure boundary or the high pressure portion of the system. The CTS is revised to conform to the ISTS. This changes the CTS by adding a requirement to the Action that specifies the acceptable valves that may be used to meet the Action.	Action Note	Action 1
ITS 3.4.14 CTS 3.4.6.3	A.6	CTS 3.4.6.3 Action 2 states that "the provision of Specification 4.0.4 is not applicable for entry into MODE 3 or 4." The corresponding ISTS contains a similar note in the affected surveillance requirement that states the surveillance is "not required to be performed in Modes 3 and 4." The CTS is revised to be consistent with the ISTS. This changes the CTS by moving the exception to performing the surveillance requirement into the surveillance requirement instead of the Actions.	SR Note	Action 2
ITS 3.4.14 CTS 3.4.6.3	A.7	CTS surveillances 4.4.6.3.1 and 4.4.6.3.2 specify the "leakage testing" requirements for the RCS pressure isolation valves (PIVs). The two CTS surveillances contain different surveillance intervals. The corresponding ISTS surveillance, SR 3.4.14.1, specifies the leakage from each PIV be verified within the required limits. The proposed ITS surveillance contains two different frequencies that correspond to the CTS surveillance intervals. The CTS surveillances are revised to conform to the single ISTS surveillance format. This changes the CTS by combining the two surveillances into a single ITS surveillance with two frequencies.	SR 3.4.14.1	4.4.6.3.1, 4.4.6.3.2
ITS 3.4.14 CTS 3.4.6.3	A.8	CTS surveillance 4.4.6.3.2 requires the performance of "additional leakage testing of each valve identified by note (d) listed in Table 4.4-3." CTS Table 4.4-3 is being moved to the LRM (discussed in a different DOC). The corresponding ISTS surveillance (SR 3.4.14.1) does not contain a similar qualification for performing this leakage verification. The CTS surveillance qualification is revised to simply require this additional testing for specific valves identified in the list of PIVs.	SR 3.4.14.1	4.4.6.3.2
ITS 3.4.14 CTS 3.4.6.3	A.9	CTS surveillances 4.4.6.3.1 and 4.4.6.3.2 specify that leakage testing be accomplished for each valve in accordance with Table 4.4-3. CTS Table 4.4-3 specifies the leakage limits at function pressure (Note a). In the ISTS, the corresponding surveillance SR 3.4.14.1 contains the requirement to verify the leakage from each PIV and provides the leakage limits and the function pressure for which the leakage limits apply. The CTS is revised to conform to the ISTS. This changes the CTS by including a more complete set of requirements in the surveillance instead of referencing a Table.	SR 3.4.14.1	4.4.6.3.1, 4.4.6.3.2
ITS 3.4.14	A.10	CTS Table 4.4-3 contains the list of PIVs and leakage limits including notes that modified	SR 3.4.14.1	Table 4.4-3 Notes

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.4.6.3		the required verification and leakage limits. CTS Table 4.4-3 Note 2 contains an exception to the 0.5 gpm/inch leakage limit that allows this limit to be exceeded if the specified conditions are met. CTS Table 4.4-3 Note 5 contains the provision that the actual pressure testing may be performed at a pressure lower than the function maximum pressure provided the leakage rates are adjusted to the function maximum pressure. The corresponding ISTS surveillance 3.4.14.1 does not contain these specific notes. The CTS provisions have been retained in the BVPS specific implementation of the ISTS SR 3.4.14.1.		
ITS 3.4.14 CTS 3.4.6.3	A.11	CTS Table 4.4-3 contains a list of the PIVs required to be within the leakage limits as well the actual leakage limits that must be met and some valve specific notes. The required leakage limits contained in CTS Table 4.4-3 including the Notes that modify the limits (CTS Notes 1, 2, and 5) are effectively retained in the corresponding ISTS surveillance SR 3.4.14.1 as either part of the surveillance or a Note modifying the surveillance. The Notes that are specific to the valves listed in Table 4.4-3 (Notes b, c, and d) are renumbered 1, 2, and 3 respectively and retained in the Table. The renumbered Notes are referenced in the revised Table column that labeled "Notes". This changes the CTS by reorganizing Table 4.4-3 such that the leakage limits are moved to the corresponding ISTS surveillance consistent with the format of the ISTS with the more valve specific Notes being retained in the Table and referenced in the "Notes" column.	SR 3.4.14.1	Table 4.4-3, Limits and Notes
ITS 3.4.14 CTS 3.4.6.3	A.12	CTS Table 4.4-3 Note 3 specifies that "Leakage rates greater than 0.5 gpm/inch diameter but less than or equal to 5.0 gpm are considered unacceptable if the latest measured rate exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50 percent or greater." and CTS Table 4.4-3 Note 4 specifies that "Leakage rates greater than 5.0 gpm are considered unacceptable." The corresponding ISTS surveillance SR 3.4.14.1does not contain provisions similar to these CTS Notes. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating these Notes from the TS.	NA	Table 4.4-3 Notes 3 & 4
ITS 3.4.14 CTS 3.4.6.3	A.13	CTS Table 4.4-3 Note 5 specifies that "observed leakage rates shall be adjusted to the function maximum pressure in accordance with ASME XI IWV 3423." The corresponding ISTS 3.4.14 does not have a similar provision in the specification. The CTS Note 5 provision is retained in the TS as Note 3 in proposed BVPS specific SR 3.4.14.1. The BVPS Note is re-stated to read: "The RCS PIV leakage may be verified at a pressure lower than the specified RCS pressure range provided the observed leakage rates are adjusted to the function maximum pressure in accordance with ASME Section XI."	SR 3.4.14.1	Table 4.4-3 Note 5
ITS 3.4.14 CTS 3.4.6.3	A.14	CTS Table 4.4-3 Note (d) specifies that " both surveillances 4.4.6.3.1 and 4.4.6.3.2 are required." This CTS Note indicates which RCS PIVs must meet both frequency requirements of the CTS PIV leakage surveillance. Since the ISTS does not include a list of valves in the TS, the ISTS does not contain a corresponding Note. The CTS note is	NA	Table 4.4-3 Note (d)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		BVPS specific and is associated with the list of valves. Therefore, it is retained in Table 4.4.3 and revised to be consistent with the ISTS format and presentation of the referenced ITS surveillance requirements.		
ITS 3.4.16 CTS 3.4.8	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.16	3.4.8
ITS 3.4.16 CTS 3.4.8	A.2	The CTS 3.4.8 LCO contains the limits associated with the RCS specific activity. The corresponding ISTS LCO does not contain the limits. In the ISTS, the limits are stated in the associated surveillance requirements that verify the LCO is met. The CTS is revised to conform to the ISTS. This changes the CTS by presenting the associated limits in the surveillance requirements instead of in the LCO.	LCO	LCO
ITS 3.4.16 CTS 3.4.8	A.3	CTS Table 4.4-12 item 4.a) contains a surveillance requirement that must be performed when the specific activity limit is exceeded. The CTS surveillance is modified by the # footnote that requires the surveillance to be performed "until the specific activity of the primary coolant system is restored to within its limits." The ISTS does not have a corresponding surveillance requirement or footnote. In the ISTS, this requirement is an Action (A.1) that is applicable when the specific activity limit is exceeded. The rules of TS usage require that Actions remain applicable when the LCO limits are not met. As such, the ISTS does not need or use a note to require the Action to be performed until the specific activity is restored. The CTS is revised to be consistent with the ISTS. This changes the CTS by making the CTS surveillance an Action which eliminates the need for the CTS # footnote.	Action A.1	Table 4.4-12 item 4.a)
ITS 3.4.3 CTS 3.4.9.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.3	3.4.9.1
ITS 3.4.3 CTS 3.4.9.1	A.2	CTS 3.4.9.1 Action states that with any of the limits exceeded, restore the temperature and/or pressure to within the limit within 30 minutes and perform an engineering evaluation to determine the effects of the out-of limit condition on the structural integrity of the RCS within 72 hours. The corresponding ISTS 3.4.3, Action Conditions A and C state that when the requirements of the LCO are not met, the parameters must be restored to within limits	Actions A & C	Action

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		and it must be determined that the RCS is acceptable for continued operation. The ISTS 3.4.3, Action 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. The CTS is revised to conform to the ISTS. This changes the CTS by adding the ISTS Note that explicitly requires a determination that the RCS is acceptable for continued operation must be performed whenever the condition is entered.		
ITS 3.4.3 CTS 3.4.9.1	A.3	Unit 1 only. The CTS 3.4.9.1 footnote 1 to the Applicability provides a reference to Special Test Exception 3.10.3. The Test Exception provides an exception to the RCS pressure and temperature limits for reactor criticality in Mode 2. The corresponding ISTS requirements do not contain references to Special Test Exceptions. In addition, this Unit 1 CTS test exception is not part of the ISTS and was deleted. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the reference to Special Test Exception 3.10.3.	3.4.3	3.4.9.1 Applicability footnote
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.12	3.4.9.3, 3.5.4.1.2
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	A.2	CTS surveillance 4.4.9.3.2.b requires a "Performance of a CHANNEL FUNCTIONAL TEST on the PORV actuation channel." The corresponding ITS surveillance SR 3.4.12.6 requires that a Channel Operational Test (COT) be performed on the required PORVs. The CTS is revised to be consistent with the ITS. This changes the CTS by specifying a COT instead of a Channel Functional Test for the PORV surveillance.	SR 3.4.12.6	4.4.9.3.2.b
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	A.3	Unit 1 only. CTS 3/4.5.4, "HHSI Flow Path" contains requirements that affect the ECCS and is part of the ECCS Section of the CTS. Unit 2 does not have a corresponding requirement. The requirements of CTS 3/4.5.4 are intended to prevent an over pressure event at low RCS temperature conditions (i.e., when operating below the Overpressure Protection System enable temperature specified in the Pressure Temperature Limits Report (PTLR)). CTS 3/4.5.4 has no corresponding TS requirements in the ISTS. However, in the ISTS, all requirements related to preventing an overpressure event at low RCS temperatures are contained in ISTS 3.4.12. Therefore, the CTS is being revised to combine the requirements of CTS 3/4.5.4 into the proposed ITS 3.4.12. This changes the CTS by consolidating all the low temperature overpressure protection related requirements into a single TS (ITS 3.4.12).	3.4.12	3/4.5.4
ITS 3.4.12	A.4	Unit 1 only. CTS 3/4.5.4, "HHSI Flow Path" specifies that the Unit 1 ECCS automatic high head safety injection flow path be isolated. CTS surveillance 4.5.4 requires that the	LCO Note	4.5.4

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.4.9.3 U1 CTS 3.5.4.1.2		affected flow path be verified isolated at least once per 7 days. The CTS surveillance contains an exception to the requirement for the flow path to be isolated. The exception allows the flow path to be unisolated for the purposes of flow testing or valve stroke testing. In the ISTS, similar exceptions are contained in LCO Notes not within the surveillances. The corresponding ITS 3.4.12 specifies this CTS exception in LCO Note 3. This changes the CTS by moving the exception to the HHSI flow path isolation requirement from the CTS surveillance to an ITS LCO Note.		
ITS 3.4.11 CTS 3.4.11	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.11	3.4.11
ITS 3.4.11 CTS 3.4.11	A.2	The CTS 3.4.11 Actions contain the requirement to restore the affected valve(s) to operable status or perform the alternate Action. In the corresponding ISTS 3.4.11 Actions, the option to restore the affected valves to operable status is not explicitly stated. The CTS is revised to conform to the ISTS. This changes the CTS Actions by eliminating the explicit Action statement to restore the affected valves to operable status.	Actions	Actions
ITS 3.4.11 CTS 3.4.11	A.3	CTS 3.4.11 Action b is applicable to "one or two PORV(s) inoperable and not capable of being manually cycled." CTS Action b requires that a minimum of two PORVs are to be OPERABLE within 72 hours. The CTS Action allows for continued operation with a single PORV inoperable. The corresponding ISTS 3.4.11 Required Action B.3 simply requires that the PORVS be restored to operable status in 72 hours and does not provide for continued operation with a single inoperable PORV. The proposed BVPS specific ITS version of this Action requires that if two PORVs are inoperable one is restored to operable status or capable of being manually cycled in 72 hours. The BVPS specific ITS requires that at least two PORVs are maintained operable or capable of being manually cycled and allows continued operation with a single inoperable PORV consistent with the CTS. This changes the CTS by revising the format and presentation of the CTS requirements to better fit the ISTS format.	Action B	Action b
ITS 3.4.11 CTS 3.4.11	A.4	CTS 3.4.11 Action b and d contain provisions for continued operation with a single inoperable valve. CTS Action b is applicable to "one or two PORV(s) inoperable and not capable of being manually cycled." This CTS Action contains a provision that states: " With one PORV inoperable and isolated, power operation may continue." CTS Action d applicable to one inoperable block valve contains a similar provision for a single inoperable and closed block valve. The corresponding ISTS Action Conditions B and C do not contain similar allowances for continued operation. The corresponding ISTS Actions require that all inoperable PORVs and Block valves be restored to operable status in 72 hours. The	Actions B & C	Actions b & d

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		CTS provision that allows continued operation in this condition for a single inoperable PORV, provided the PORV is isolated, and the similar block valve requirement are retained in the BVPS specific version of ITS 3.4.11 Action Conditions B and C. The CTS is revised to conform more closely to the ISTS format and presentation of Actions.		
ITS 3.4.11 CTS 3.4.11	A.5	CTS Action e is applicable when more than one block valve is inoperable. The CTS Action contains the requirement to "restore a minimum of two block valves to OPERABLE status within 72 hours." BVPS has three block valves and the CTS Action addresses two or three inoperable block valves. The CTS Action allows for continued operation with a single block valve inoperable consistent with CTS Action d (ITS Action Condition C). The corresponding ISTS 3.4.11 Required Action F.3 simply requires that the remaining block valves be restored to operable status in 72 hours and does not provide for continued operation with a single inoperable block valve. The proposed BVPS specific ITS version of this Action requires that if two block valves are inoperable one is restored to operable status in 72 hours. The BVPS ITS utilizes ISTS style Notes to identify the Actions for two or three inoperable valves. This changes the CTS by revising the format and presentation of the CTS requirements to better fit the ISTS format.	Action F.3	Action e
ITS 3.4.11 CTS 3.4.11	A.6	The Unit 1 and Unit 2 CTS surveillance 4.4.11.1 require that the PORVs be operated through one complete cycle. However, the Unit 1 surveillance is different due to Unit design differences. The Unit 1 surveillance must verify PORV operation on both the normal air supply and the backup nitrogen supply. Unit 2 does not use air operated valves. Therefore, the proposed BVPS specific ITS surveillance SR 3.4.11.2 is comprised of two separate surveillances (SR 3.4.11.2.1 for Unit 1 and SR 3.4.11.2.2 for Unit 2). Each of the surveillances contains a Note that identifies the surveillance as applicable to Unit 1 or Unit 2.	SR 3.4.11.2.1 & SR 3.4.11.2.2	4.4.11.1
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.4.19	3.10.5 & 3.10.4
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	A.2	Applies to Unit 1 only. Unit 1 CTS 3.10.5 Applicability states "During operation below the P-7 Interlock Setpoint." The corresponding ISTS 3.4.19 Applicability states "MODES 1 and 2 during startup and Physics Tests." The Unit 1 CTS Applicability and associated surveillance requirement are revised to conform to the ISTS 3.4.19 Applicability. This changes the CTS Applicability by eliminating the repetition of the P-7 power limit and stating the applicability in terms of operational Modes and performance of startup and Physics Tests.	Applicability	Applicability

Table A
Administrative Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	A.3	Applies to Unit 1 only. Unit 1 CTS surveillance 4.10.5.2 requires that a Channel Functional Test be performed on the specified instrumentation. The corresponding ISTS surveillance 3.4.19.2 requires that a COT (Channel Operational Test) be performed on the specified instrumentation. The CTS is revised to conform to the ISTS. This changes the CTS by requiring a Channel Operational Test be performed on the required instrumentation instead of a Channel Functional Test.	SR 3.4.19.2	4.10.5.2

Table A
Administrative Changes
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.5.1 CTS 3.5.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.1	3.5.1
ITS 3.5.1 CTS 3.5.1	A.2	CTS 3.5.1 states, in the LCO, that each Reactor Coolant System accumulator shall be OPERABLE and states specific requirements that must be met for each accumulator to be considered OPERABLE. ITS LCO 3.5.1 states that three ECCS accumulators shall be OPERABLE. The CTS are revised to conform to the ISTS. This changes the CTS by moving the specific requirements for OPERABILITY to the acceptance criteria contained in ITS SR 3.5.1.1, SR 3.5.1.2, SR 3.5.1.3, and SR 3.5.1.4.	SRs	LCO
ITS 3.5.1 CTS 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 required to be entered. The CTS are revised to conform to the ISTS. This changes the CTS by adding ITS 3.5.1 ACTION D. ITS 3.5.1 ACTION D directs immediate entry into LCO 3.0.3 when two or more accumulators are inoperable.	Action D	Actions
ITS 3.5.1 CTS 3.5.1	A.4	The CTS 3.5.1 Applicability is modified by a Note restricting the MODE 3 Applicability to when pressurizer pressure is above 1000 psig. The CTS are revised to conform to the ISTS. This changes the CTS 3.5.1 MODE 3 Applicability pressure reference from pressurizer pressure to RCS pressure. The ITS 3.5.1 Applicability restricts the MODE 3 Applicability to when RCS pressure is above 1000 psig.	Applicability	Applicability
ITS 3.5.2 CTS 3.5.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.2	3.5.2
ITS 3.5.3 CTS 3.5.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.3	3.5.3
ITS 3.5.3 CTS 3.5.3	A.2	The CTS 3.5.3 Action Note regarding the applicability of LCO 3.0.4.b refers the centrifugal charging pumps. The corresponding ISTS Note refers to the ECCS high head subsystem.	Action Note	Action Note

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		The CTS Note is revised to conform to the ISTS. This changes the CTS by replacing the reference to the charging pumps with high head subsystem.		
ITS 3.5.3 CTS 3.5.3	A.3	Unit 2 only. 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 Surveillance Requirements of ITS 3.5.2 that must be performed. The CTS is revised to conform to the ITS. This changes the CTS by listing the applicable surveillance requirements.	SR 3.5.3.1	4.5.3.1
ITS 3.5.3 CTS 3.5.3	A.4	Unit 1 only. CTS surveillance 4.5.3.1 states the exceptions to the surveillance requirements of 4.5.2. The corresponding ISTS surveillance SR 3.5.3.1 states the applicable requirements of 4.5.2. The CTS surveillance is revised to be consistent with the ISTS. This changes the CTS by specifying the required surveillances instead of the exceptions.	SR 3.5.3.1	4.5.3.1
ITS 3.5.5 U2 CTS 3.5.4 U1 CTS 3.5.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.5	U1 3.5.5 U2 3.5.4
ITS 3.5.5 U2 CTS 3.5.4 U1 CTS 3.5.5	A.2	Unit 1 CTS 4.5.5 and Unit 2 CTS 4.5.4 require verification at least once per 31 days that the valves are adjusted to give a flow within the limit with the charging pump discharge pressure greater than or equal to the required value and the seal injection flow control valve full open. ITS SR 3.5.5.1 requires verification every 31 days that manual seal injection throttle valves are adjusted to give a flow $\leq$ 28 gpm with the charging pump discharge pressure greater than or equal to the required value and the seal injection flow control valve full open. The CTS are revised to conform to the ISTS. This changes the CTS by specifying which valves (i.e., manual) that must be verified adjusted for the proper flow.	SR 3.5.5.1	U1 4.5.5 U2 4.5.4
ITS 3.5.4 CTS 3.1.2.8	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.5.4	3.1.2.8
ITS 3.5.4 CTS 3.1.2.8	A.2	Unit 1 CTS 4.1.2.8.a.2 specifies that the RWST shall be demonstrated OPERABLE by verifying once per 7 days that the “contained” borated water volume is between 439,050	SR 3.5.4.2	4.1.2.8.a.2

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		gallons and 441,100 gallons. ITS SR 3.5.4.2 verifies once per 7 days that the Unit 1 RWST borated water volume is 430,500 gallons. The CTS is changed to specify a “usable” volume of 430,500 gallons rather than a “contained” volume of 439,050 gallons.		

Table A
Administrative Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.6.1 CTS 3.6.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.1	3.6.1.1
ITS 3.6.1 CTS 3.6.1.1	A.2	CTS surveillance 4.6.1.1.a.1 requires that the status of all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed under accident conditions be periodically verified. The corresponding ISTS surveillances (ITS SR 3.6.3.2 & SR 3.6.3.3) specify that the status of each containment isolation manual valve and blind flange required to be closed under accident conditions be periodically verified. The CTS surveillance is revised to conform to the ISTS surveillances. This changes the CTS by specifically associating the surveillance requirement with manual valves and blind flanges.	SR 3.6.3.2 & SR 3.6.3.3	4.6.1.1.a.1
ITS 3.6.1 CTS 3.6.1.1	A.3	CTS surveillance 4.6.1.1.a.1 requires that the status of all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed under accident conditions be periodically verified every 31 days. The CTS surveillance is modified by Footnote 1 that provides an exception to the 31-day verification for isolation devices (valves and flanges) located in containment. The CTS footnote specifies that isolation devices located inside containment need only be verified during each Cold shutdown (Mode 5) but not more often than once per 92 days. The corresponding ISTS surveillance requirements (ITS SR 3.6.3.2 & SR 3.6.3.3) separate the requirements for valves inside and outside of containment into two surveillance requirements. The requirements contained in these two ISTS surveillances were previously addressed by the single CTS surveillance 4.6.1.1.a.1 and associated footnote. The CTS surveillance and associated footnote are revised to conform to the ISTS. This changes the CTS by dividing the single CTS surveillance 4.6.1.1.a.1 and associated footnote into two separate surveillances, one for valves inside containment and one for valves outside containment.	SR 3.6.3.2 & SR 3.6.3.3	4.6.1.1.a.1
ITS 3.6.1 CTS 3.6.1.1	A.4	CTS surveillance 4.6.1.1.a.1 and associated Footnote 1 include a requirement to verify that deactivated automatic valves inside and outside containment are closed. The corresponding surveillance requirements in the ISTS do not contain this requirement to verify the position of deactivated automatic valves. The ISTS addresses deactivated automatic valves differently in the containment isolation valve specification (ITS 3.6.3). ISTS 3.6.3 includes Actions (A.1 & A.2) that require the position of deactivated automatic valves to be verified. In addition, ISTS 3.6.3 includes a separate surveillance for the containment purge and exhaust isolation valves which are always closed and deactivated in Modes 1-4. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by moving the requirement to verify closed deactivated automatic valves from the valve position surveillance requirements into the Actions and a separate surveillance for	3.6.3 Actions	4.6.1.1.a.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		the containment purge and exhaust isolation valves.		
ITS 3.6.1 CTS 3.6.1.1	A.5	The CTS Specification 3.6.1.1, Containment, includes requirements for containment operability. CTS 3.6.1.1 requires that Containment Integrity be maintained and the surveillances associated with this Specification address containment penetration status and require compliance with the air lock specification. The corresponding ISTS 3.6.1 surveillance (ITS SR 3.6.1.1) requires visual examinations and leakage rate testing, except for containment air lock testing, in accordance with the containment leakage rate testing program. The CTS is revised to conform to the ISTS. This changes the CTS surveillances for the containment specification by focusing the surveillance requirements on the required visual examinations and leakage limits. The proposed change also effectively incorporates part of the defined term, "Containment Integrity", into the ITS surveillance as a leakage rate testing requirement.	SRs	SRs
ITS 3.6.1 CTS 3.6.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.1	3.6.1.2
ITS 3.6.1 CTS 3.6.1.2	A.2	CTS 3.6.1.2 LCO contains the requirement to assure containment leakage rates are limited in accordance with the Containment Leakage Rate Testing Program. The Applicability for CTS 3.6.1.2 is Modes 1-4. The CTS Actions applicable if the leakage rates exceed the required limits provides 1 hour to restore the leakage rates to within the limit or the plant must be placed in Mode 3 within the next 6 hours and Mode 5 within the following 30 hours. The ISTS does not contain a separate Specification for leakage rates. The ISTS includes a leakage rate surveillance in ITS 3.6.1, Containment. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the separate LCO, Applicability and Actions for containment leakage. In the ISTS, containment leakage is addressed by the LCO, Applicability, and Actions of ITS 3.6.1, Containment.	3.6.1	3.6.1.2
ITS 3.6.1 CTS 3.6.1.2	A.3	CTS surveillance 4.6.1.2.a requires the containment leakage rates (except air lock leakage) to be determined in accordance with the Containment Leakage Rate Testing Program. The CTS surveillance includes a list of the Types (A, B, and C) of testing required by the Program. The ISTS does not have a separate specification for Containment Leakage like CTS 3.6.1.2. However, the corresponding ISTS surveillance SR 3.6.1.1 is located in the containment specification (ITS 3.6.1) and simply specifies that the required visual inspections and leakage rate testing, except for containment air lock testing, be performed in accordance with the Containment Leakage Rate Testing Program. The CTS is revised to conform to the ISTS. This changes the CTS by simplifying the surveillance requirement. The simplification results in eliminating the list of specific test	SR 3.6.1.1	4.6.1.2.a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		Types from the surveillance and specifying the surveillance be performed in accordance with the Containment Leakage Rate Testing Program.		
ITS 3.6.1 CTS 3.6.1.2	A.4	CTS surveillance 4.6.1.2.b specifies that the air locks shall be tested in accordance with surveillance requirement 4.6.1.3 (the air lock specification surveillance). The ISTS containment specification (ITS 3.6.1) does not contain a similar surveillance requirement that specifies the performance of the air lock surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the leakage specification surveillance that requires the air locks to be tested in accordance with the air lock surveillance requirement.	NA	4.6.1.2.b
ITS 3.6.2 CTS 3.6.1.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.2	3.6.1.3
ITS 3.6.2 CTS 3.6.1.3	A.2	CTS 3.6.1.3 General Note number 3 requires that the Action of LCO 3.6.1.1 and 3.6.1.2, be entered when air lock leakage results in exceeding the combined containment leakage rate acceptance criteria. The corresponding ISTS Action Note 3 requires that the Conditions and Required Actions of LCO 3.6.1, "Containment," be entered when air lock leakage results in exceeding the overall containment leakage rate. The CTS is revised to be consistent with the ISTS. This changes the CTS by referencing the new single containment LCO (3.6.1) instead of two separate CTS LCOs with leakage requirements. The change to referencing overall leakage rate instead of combined leakage rate is addressed in another DOC.	Note 3	Note 3
ITS 3.6.2 CTS 3.6.1.3	A.3	CTS Action a provides the requirements to be followed when one air lock door is inoperable in one or more air locks. CTS Action b provides the requirements to be followed when the air lock door interlock mechanism in one or more air locks is inoperable. The requirements for both CTS Actions (a and b) involve closing and locking an operable door in the affected air lock and periodically verifying the door is locked closed. The corresponding ISTS Action Conditions A and B are the same as the CTS except that the ISTS Action Conditions are modified by a Note that states the Required Actions are not applicable if both doors in the same air lock are inoperable and Condition C is entered. The CTS is revised to conform to the ISTS. This changes the CTS by adding the ISTS Note to both CTS Actions a and b.	Actions A & B	Action a
ITS 3.6.2 CTS 3.6.1.3	A.4	CTS Action c.1 requires that the combined containment leakage rate be evaluated per LCO 3.6.1.2 when the air lock is operable for reasons other than Actions a and b. The corresponding ISTS Required Action C.1 is similar except it references the ITS	Action C.1	Action c.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		containment LCO 3.6.1 and the overall containment leakage rate. The CTS is revised to require the containment leakage rate be evaluated per the correct containment LCO (ITS 3.6.1). This changes the CTS by revising the referenced LCO to the corresponding ITS LCO and eliminating a reference to a specific type of leakage limit addressed by the containment LCO.		
ITS 3.6.2 CTS 3.6.1.3	A.5	CTS requirement 4.6.1.3.a contains requirements for the air lock leakage rate testing. The CTS surveillance references the containment leakage rate testing program for the test frequency and contains the air lock leakage rate acceptance criteria. The corresponding ISTS surveillance SR 3.6.2.1 simply references the containment leakage rate testing program for all the surveillance requirements. The CTS is revised to conform to the ISTS. This changes the CTS by reformatting and moving the air lock leakage rate acceptance criteria to the containment leakage rate testing program in Section 5.0 of the TS and simplifying the air lock leakage surveillance requirement.	SR 3.6.2.1	4.6.1.3.a
ITS 3.6.4 CTS 3.6.1.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.4	3.6.1.4
ITS 3.6.5 CTS 3.6.1.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.5	3.6.1.5
ITS 3.6.1 CTS 3.6.1.6	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.1	3.6.1.6
ITS 3.6.1 CTS 3.6.1.6	A.2	CTS 3.6.1.6 includes requirements for containment operability related to the structural integrity of the containment. The requirements are applicable in Modes 1-4 and the Actions require restoration within 1 hour or the plant must be placed in Mode 3 in the next 6 hours and Mode 5 within the following 30 hours. The ISTS does not include a separate specification for containment structural integrity. The ISTS addresses the requirement for	3.6.1	3.6.1.6

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		containment structural integrity as part of ITS 3.6.1, Containment. The ISTS containment specification requires that containment be operable. The ISTS Containment specification is applicable in the same Modes as the CTS Structural Integrity specification and has the same Actions if the containment is not operable. The CTS is revised to conform to the ISTS. This changes the CTS by consolidating the containment operability requirements into a single ITS Specification 3.6.1.		
ITS 3.6.1 CTS 3.6.1.6	A.3	CTS surveillances 4.6.1.6.1 and 4.6.1.6.2 include details relating to the required visual inspections of containment and a requirement to document the inspections in a report. The corresponding ISTS surveillance (SR 3.6.1.1) simply specifies that the required visual examinations be performed in accordance with the containment leakage rate testing program. The ISTS surveillance does not include any detailed instructions for inspection or reports. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the details of the required visual examination and report from the surveillance.	SR 3.6.1.1	4.6.1.6.1 and 4.6.1.6.2
ITS 3.6.6 CTS 3.6.2.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.6	3.6.2.1
ITS 3.6.7 CTS 3.6.2.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.7	3.6.2.2
ITS 3.6.7 CTS 3.6.2.2	A.2	Unit 2 only. Unit 2 CTS Action statement b specifies that the Action statements in ECCS Specifications 3.5.2 and 3.5.3 are applicable for inoperable subsystems containing the two Recirculation Spray System (RSS) pumps that are used in the ECCS low head recirculation mode of operation (2RSS-P21C and 2RSS-P21D). The sharing of these two RSS subsystems with the ECCS is a unique feature of the BVPS Unit 2 design that is not part of the ISTS requirements. The corresponding requirement in the proposed ITS 3.6.7 Specification is an Actions Note applicable only to Unit 2 that states "In addition to the applicable Required Actions below, the Conditions and Required Actions of LCO 3.5.2, ECCS Operating, or LCO 3.5.3, ECCS Shutdown, may also be applicable when subsystem(s) containing RS pumps 2RSS-P21C or 2RSS-P21D are inoperable". This changes the format and presentation of the CTS Action to more closely correspond to similar requirements in the ISTS and to more clearly state the applicability of the RSS and	Action Note	Action b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		ECCS Specifications.		
ITS 3.6.7 CTS 3.6.2.2	A.3	CTS Action statement a contains the default Action if an RSS subsystem is not restored to operable status. The CTS default Action requires that the plant be in HOT STANDBY within the next 6 hours; restore the inoperable spray subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 30 hours. The CTS default Action allows a total time of 84 hours to reach Mode 5 (6 + 48 + 30 = 84). The corresponding ISTS Action (ITS 3.6.7 Condition D) simply specifies be in Mode 3 in 6 hours and be in Mode 5 in 84 hours. This changes the CTS Action by simplifying the required Actions while retaining the same total time as specified in the CTS to reach each specified Mode.	Action D	Action a
ITS 3.6.7 CTS 3.6.2.2	A.4	Unit 1 only. Unit 1 CTS surveillance 4.6.2.2.a states " At least once per 31 days by verifying that each accessible valve (manual, power-operated or automatic) in the flow path not locked, sealed or otherwise secured in position, is in its correct position. The corresponding ITS SR 3.6.7.1 is similar except that the word "accessible" is not used to modify the valves for which the surveillance applies. The CTS is revised to conform to the ITS. This changes the CTS by eliminating the qualification of "accessible" from the valves for which the surveillance is applicable.	SR 3.6.7.1	4.6.2.2.a
ITS 3.6.8 CTS 3.6.2.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.8	3.6.2.3
ITS 3.6.8 CTS 3.6.2.3	A.2	CTS surveillance 4.6.2.3.b specifies that the required flow rate of each injection pump be verified pursuant to Specification 4.0.5. The corresponding ITS surveillance (SR 3.6.8.6) specifies that the flow rate be verified in accordance with the Inservice Testing Program. The CTS is revised to conform to the ITS. This changes the CTS by substituting the Inservice Testing Program in place of a reference to Specification 4.0.5.	SR 3.6.8.6	4.6.2.3.b
ITS 3.6.3 CTS 3.6.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.6.3	3.6.3.1
ITS 3.6.3	A.2	CTS 3.6.1.1 surveillance 4.6.1.1.a.1 requires that the status of all penetrations not capable of being closed by operable containment automatic isolation valves and required to be	SR 3.6.3.2 & SR	4.6.1.1.a.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.6.3.1		closed under accident conditions be periodically verified every 31 days. The CTS surveillance is modified by Footnote 1 that provides an exception to the 31-day verification for isolation devices (valves and flanges) located inside containment. The CTS 3.6.1.1 footnote specifies that isolation devices located inside containment need only be verified during each Cold shutdown (Mode 5) but not more often than once per 92 days. The corresponding ISTS surveillance requirements are located in ITS 3.6.3, Containment Isolation Valves (SR 3.6.3.2 & SR 3.6.3.3) and separate the requirements for valves inside and outside of containment into two surveillance requirements. The requirements contained in these two ISTS surveillances were previously addressed by the single CTS surveillance 4.6.1.1.a.1 and associated footnote. The CTS surveillance and associated footnote are revised to conform to the ISTS. This changes the CTS by dividing the single CTS surveillance 4.6.1.1.a.1 and associated footnote into two separate surveillances, one for valves inside containment and one for valves outside containment and moving these two new surveillances to ITS 3.6.3 which is the specification for containment isolation valves.	3.6.3.3	

Table A
Administrative Changes
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.7.1 CTS 3.7.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.1	3.7.1.1
ITS 3.7.5 CTS 3.7.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.5	3.7.1.2
ITS 3.7.5 CTS 3.7.1.2	A.2	Note (6) of CTS 4.7.1.2.4 and 4.7.1.2.5 specifies an allowance that the surveillance requirements are not applicable in MODE 4 when steam generator(s) is relied upon for heat removal. The CTS Note provides an exception for the requirement that all AFW valves be maintained in the required positions when the associated steam generator is being used for heat removal. The CTS Note effectively allows the water level of the affected steam generator to be maintained. The corresponding Notes of ITS SR 3.7.5.1, SR 3.7.5.3, and SR 3.7.5.4 provide a similar allowance that AFW train(s) may 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. The ITS Note provides an exception that is applicable when the associated steam generator is being used for heat removal and the water level must be maintained. The CTS Note is replaced by the ISTS Note. This changes the CTS by revising the existing requirement with a similar requirement that is more specific to the operational details for meeting the Surveillance Requirement.	SR Notes	Note 6
ITS 3.7.5 CTS 3.7.1.2	A.3	CTS 4.7.1.2.3 states that "the provision of Specification 4.0.4 is not applicable for entry into MODE 3 for the steam turbine driven pump testing." ITS SR 3.7.5.2 contains a similar note in the affected surveillance requirement that states the surveillance is "not required to be performed for the turbine driven AFW pump until 24 hours after ≥ 600 psig in the steam generator." The CTS is revised by the deletion of the exception to Specification 4.0.4 leaving the specific steam generator pressure requirement in the surveillance. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by replacing the exception to Specification 4.0.4 with an exception that is more specific to the operational details for meeting the Surveillance Requirement.	SR 3.7.5.2	4.7.1.2.3
ITS 3.7.5 CTS 3.7.1.2	A.4	CTS 3.7.1.2 requires three AFW trains to be OPERABLE with one feedwater injection header to each steam generator. The Actions associated with the CTS LCO do not explicitly state all conditions for inoperable injection headers. These conditions were	Actions	Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		interpreted within the CTS as part of an associated AFW train and were explicitly clarified by the CTS Bases. ITS 3.7.5 requires three AFW trains and three feedwater injection headers to be OPERABLE. The Actions associated with the ITS LCO explicitly states all conditions for inoperable injection headers. This changes the CTS by adding Actions associated with inoperable feedwater injection headers.		
ITS 3.7.5 CTS 3.7.1.2	A.5	CTS surveillance 4.7.1.2.7 is revised by CTS Note 7 that states: "This surveillance is required to be performed prior to entry into MODE 2 whenever the plant has been in MODES 5 or 6 for greater than 30 continuous days." The corresponding ISTS surveillance contains a similar frequency for performance with the exception that the ISTS specifies "greater than 30 "cumulative" days instead of continuous days. The CTS is revised to conform to the ISTS. This changes the CTS by replacing the continuous with cumulative in the frequency for CTS surveillance 4.7.1.2.7.	SR 3.7.5.5	4.7.1.2.7
ITS 3.7.6 CTS 3.7.1.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.6	3.7.1.3
ITS 3.7.6 CTS 3.7.1.3	A.2	CTS 3.7.1.3 Action a provides an option to restore within 4 hours the water volume if the PPDWST is not within limit or be in HOT SHUTDOWN within the next 12 hours. The corresponding ISTS Action does not include an action to “restore.” The CTS Actions are revised consistent with the ISTS. This changes the CTS by eliminating the presentation of the restore Action. The revised CTS Action contains only the alternative to the restore Action (CTS 3.7.1.3 Action b).	NA	Action a
ITS 3.7.13 CTS 3.7.1.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.13	3.7.1.4
ITS 3.7.2 CTS 3.7.1.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.2	3.7.1.5

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.7.2 CTS 3.7.1.5	A.2	CTS 3.7.1.5 Action for MODES 2 and 3 provides when a MSIV is inoperable subsequent operation may proceed after the MSIV is restored to OPERABLE status. Condition C of ITS 3.7.2 does not specifically state this restoration allowance. The CTS is revised to eliminate this unnecessary restoration allowance and conform to the ITS. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431.	Action C	Action
ITS 3.7.3 CTS NA		**NONE**		
ITS 3.7.7 CTS 3.7.3.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.7	3.7.3.1
ITS 3.7.7 CTS 3.7.3.1	A.2	The CTS 3.7.3.1 LCO states “At least two component cooling water subsystems shall be OPERABLE.” ITS 3.7.7 LCO states “Two CCW trains shall be OPERABLE.” The CTS is revised to conform to the ISTS. This changes the CTS consistent with the wording of the ISTS 3.7.7 LCO. Specifically, the term “at least” is deleted and the term “subsystems” has been replaced with “trains.”	LCO	LCO
ITS 3.7.7 CTS 3.7.3.1	A.3	For Unit 1 only, CTS 3.7.3.1 Action states “With less than two component cooling water subsystems OPERABLE, restore at least two subsystems to OPERABLE status within 72 hours.” Condition A of ITS 3.7.7 requires with one CCW train inoperable, restore the inoperable train to OPERABLE status within 72 hours. This changes the CTS consistent with the wording of ISTS 3.7.7. Specifically, the phrase “with less than two…OPERABLE” is replaced with “one…inoperable.”	Action A	Action
ITS 3.7.7 CTS 3.7.3.1	A.4	CTS 4.7.3.1.a requires each CCW pump to be tested in accordance with the requirements of Specification 4.0.5. ITS 5.5 provides controls for Inservice Testing of ASME Code Class 1, 2, and 3 components. ITS 3.7.7 does not contain the specific Surveillance to test each CCW pump in accordance with Specification 4.0.5. This changes the CTS by eliminating a redundant requirement to perform testing in accordance with the Inservice Testing Program.	NA	4.7.3.1.a
ITS 3.7.8 CTS 3.7.4.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain	3.7.8	3.7.4.1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.7.8 CTS 3.7.4.1	A.2	CTS 3.7.4 states that “At least two service water subsystems supplying safety related equipment shall be “OPERABLE.” Similar words are used in the CTS Action. ITS 3.7.8 states “Two SWS trains shall be OPERABLE.” The CTS is revised to conform to the ISTS wording. This changes the CTS by deleting the term “at least” and replacing the term “subsystem” with “train.” In addition, the descriptive term "safety related" is removed from the CTS LCO.	LCO	LCO
ITS 3.7.8 CTS 3.7.4.1	A.3	CTS 4.7.4.1.a requires each SWS pump to be tested in accordance with the requirements of Specification 4.0.5. ITS 5.5 provides controls for Inservice Testing of ASME Code Class 1, 2, and 3 components. ITS 3.7.8 does not contain the specific Surveillance to test each SWS pump in accordance with Specification 4.0.5. This changes the CTS by eliminating a redundant requirement to perform testing in accordance with the Inservice Testing Program.	NA	4.7.4.1.a
ITS 3.7.8 CTS 3.7.4.1	A.4	For Unit 1 only, CTS 3.7.4.1 Action states “With less than two RPRWS (SWS) subsystems OPERABLE, restore at least two subsystems to OPERABLE status within 72 hours.” Condition A of ITS 3.7.8 requires with one SWS train inoperable, restore the inoperable train to OPERABLE status within 72 hours. This changes the CTS consistent with the wording of ISTS 3.7.8. Specifically, the phrase “with less than two…OPERABLE” is replaced with “one…inoperable.”	Action A	Action
ITS 3.7.9 CTS 3.7.5.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.9	3.7.5.1
ITS 3.7.4 CTS NA		**NONE**		
ITS 3.7.11 CTS 3.7.6	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical	3.7.11	3.7.6

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		Specifications-Westinghouse Plants" (ISTS).		
ITS 3.7.11 CTS 3.7.6	A.2	CTS Footnote * for LCO 3.7.6 states that emergency backup power for only one train of dampers and fans of the CREACS is required in MODES 5, 6, and with no fuel assemblies in the reactor vessel. The corresponding ISTS 3.7.11 does not contain a similar footnote. The CTS has been revised to delete the footnote consistent with the ISTS. This changes the CTS by eliminating the allowance provided by the note for emergency backup power for one train of CREACS.	NA	Footnote *
ITS 3.7.11 CTS 3.7.6	A.3	The CTS CREACS Actions applicable when moving fuel are separated from the Actions applicable in Modes 1-4. The CTS text used to separate the Actions is reformatted to ISTS style Notes in the corresponding ITS Action Conditions (C and D). This changes the CTS by combining the different Unit 1 and Unit 2 fuel movement applicability (recently and non-recently irradiated fuel) into the same ITS Action Conditions. The addition of these Unit specific Notes also results in the deletion of the Unit 2 Action statement references to "recently". As the Unit 2 specific Action Condition Note identifies the Condition as only pertaining to the movement of recently irradiated fuel, the additional references to "recently" in the Required Actions are no longer necessary for Unit 2. The combination of Unit 1 and 2 specific notes in ITS Conditions C and D, define the applicability of the Conditions for each Unit and allow the text of the Required Actions to be the same for each Unit.	Action C & D Notes	Actions
ITS 3.7.11 CTS 3.7.6	A.4	Unit 1 only. The CREACS surveillance requirement specifies that the system's heat removal and purge functions be verified every 18 months. The Unit 1 surveillance requirement is revised by the addition of a note that that takes exception to the requirement to verify the heat removal capability of the system when moving non-recently irradiated fuel. The addition of the proposed surveillance note is consistent with the existing LCO Note that takes exception to the requirement for the heat removal function of the system to be operable to support fuel movement involving non-recently irradiated fuel.	SR 3.7.11.1	4.7.6.1
ITS 3.7.10 CTS 3.7.7	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.10	3.7.7.1 (U1) 3.7.7 (U2)
ITS 3.7.10 CTS 3.7.7	A.2	CTS Footnote * for LCO 3.7.7 states that emergency backup power for only one train of CREVS is required in MODES 5, 6, and with no fuel assemblies in the reactor vessel. The corresponding ISTS 3.7.10 does not contain a similar footnote. The CTS has been revised to delete the footnote consistent with the ISTS. This changes the CTS by eliminating the allowance provided by the note for emergency backup power for one train of CREVS.	NA	3.7.7 Footnote *

Table A
Administrative Changes
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.7.10 CTS 3.7.7	A.3	The CTS requires the CREVS to be demonstrated OPERABLE by various filtration testing requirements. These CTS surveillance requirements contain the details for verifying the operability of the CREVS filtration equipment. The corresponding ISTS surveillances contain a single requirement for verifying the operability of the CREVS filtration equipment (ITS SR 3.7.10.2). The ITS SR simply states "Perform required CREVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP)." The CTS surveillances are changed by replacing the detailed filtration requirements with a single surveillance referencing the VFTP. The CREVS filtration requirements detailed in CTS surveillance 4.7.7.1.1 (Unit 1) and 4.7.7.1 (Unit 2) are moved to the VFTP. The details of the VFTP are specified in the Administrative Controls Section of the Technical Specifications (Section 5.0 of the ITS). The movement of these requirements to Section 5.0 is necessary to adopt the ISTS format and presentation of these requirements.	SR 3.7.10.2	4.7.7.1.1 (Unit 1) and 4.7.7.1 (Unit 2)
ITS 3.7.10 CTS 3.7.7	A.4	Unit 1 only. The Unit 1 CTS surveillances for the CREVS include a requirement that references the corresponding Unit 2 CREVS surveillances (CTS 4.7.7.1.2). CTS 4.7.7.1.2 states, "the BV-2 CREVS, when utilized to meet BV-1 Technical Specification 3.7.7.1, shall be demonstrated OPERABLE as described in BV-2 Technical Specification 4.7.7.1". In order to meet the LCO requirements for two operable CREVS trains, Unit 1 may credit one or both of the Unit 2 CREVS trains. The CTS requirements for each Unit are contained in separate documents. Therefore, CTS surveillance 4.7.7.1.2 is used in the Unit 1 CREVS specification to reference the Unit 2 technical specifications in order to specify the operability requirements for a Unit 2 CREVS train when it is used to meet the Unit 1 LCO requirement. The proposed BVPS ITS 3.7.10 CREVS requirements combine both the Unit 1 and Unit 2 CTS requirements into a single Technical Specification. As a result of combining the requirements into a single technical specific applicable to both Units, the need for CTS surveillance 4.7.7.1.2 is eliminated. Therefore, CTS 4.7.7.1.2 is deleted.	NA	4.7.7.1.2
ITS 3.7.10 CTS 3.7.7	A.5	The CTS Staggered Test Frequency of 36 months is revised to 18 months consistent with the ISTS. As the ISTS definition of Staggered Testing is different from the CTS definition, the proposed change does not result in a change to the surveillance frequency. The CTS definition of Staggered Testing requires that the stated surveillance frequency be divided by the number of trains being tested to determine the frequency for an individual train (36 months divided by 2 equals 18 months). The corresponding ISTS definition requires that the frequency for testing an individual train be stated in the surveillance (in this case 18 months). The proposed change is necessary to adopt the new ISTS definition of Staggered Testing.	SR 3.7.10.4	4.7.7.1.f
ITS 3.7.10 CTS 3.7.7	A.6	Unit 1 only. Unit 1 CTS surveillance 4.7.7.1.b verifies CREVS operability and states; "At least once per 31 days by verifying that the CREVS train operates for ≥ 15 minutes with the heaters in operation." The corresponding ITS SR 3.7.10.1 specifies a similar requirement to verify CREVS operability except that the ITS surveillance requires each CREVS train to	SR 3.7.10.1	4.7.7.1.b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		be operated instead of "the" CREVS train be operated. The Unit 1 SR is revised to conform to the ITS SR. This changes the CTS by specifying both required CREVS trains be operated instead of the single Unit 1 train.		
ITS NA CTS 3.7.8.1		**NONE**		
ITS 3.7.12 CTS 3.9.12	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.12	3.9.12
ITS 3.7.12 CTS 3.9.12	A.2	CTS 4.9.12.2.b (Unit 1) and CTS 4.9.12.2 (Unit 2) states “The fuel building portion of the SCLRS shall be demonstrated OPERABLE by testing the SLCRS per Specification 4.7.8 with the exception to item 4.7.8.1.c.2.” ITS SR 3.7.12.2 states “Perform required SLCRS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).” The CTS is changed by replacing the requirement referencing the SLCRS surveillance with a specific surveillance referencing the VFTP. The SLCRS filtration requirements of CTS 4.7.8.1.b, 4.7.8.1.c.1, and 4.7.8.1.d are moved to the VFTP located in the Administrative Controls Section 5.0 of the ITS for the movement of recently irradiated fuel assemblies. The CTS is revised to conform to the ISTS wording and format and is consistent with the location of these requirements in the ISTS.	SR 3.7.12.2	4.9.12.2.b (U1) 4.9.12.2 (U2)
ITS 3.7.12 CTS 3.9.12	A.3	Unit 1 only. The SLCRS CTS does not contain an explicit Applicability for the operation of the SLCRS whenever required during fuel movement involving recently irradiated fuel assemblies in the Unit 1 containment. In CTS 3.9.4, "Containment Building Penetrations," (ITS 3.9.3) the Unit 1 SLCRS is required operable and in operation filtering containment exhaust during fuel movement involving recently irradiated fuel assemblies in the Unit 1 containment. SLRCS operability in this case constitutes the ITS 3.9.3 required status of the Unit 1 containment purge and exhaust penetration when the containment purge and exhaust system is not isolated.	Applicability	Applicability
ITS 3.7.12 CTS 3.9.12	A.4	Unit 1 only. Unit 1 CTS surveillance 4.9.12.2.a requires the integrity of the fuel pool storage area be verified by assuring a single train of SLCRS can maintain a negative pressure in the area. The CTS surveillance is revised by the addition of a Note that clarifies the surveillance is only applicable for fuel movement involving recently irradiated fuel in the fuel storage pool.	SR 3.7.12.3	4.9.12.2.a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.7.15 CTS 3.9.11	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.15	3.9.11
ITS 3.7.14 CTS 3.9.14	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.14	3.9.14
ITS 3.7.14 CTS 3.9.14	A.2	Not Used.		
ITS 3.7.14 CTS 3.9.14	A.3	Action a of CTS 3.9.14 (Unit 1 only) requires the suspension of all actions involving “movement” of fuel in the spent fuel pool if it is determined a fuel assembly has been “placed” in the incorrect Region until such time as the correct storage location is determined. The CTS also requires “moving” the assembly to its correct location before resumption of any other fuel movement. In addition, CTS 4.9.14.1 specifies surveillance requirement verification for the “placing or moving” of fuel. ISTS 3.7.17 (ITS 3.7.14) requires the initiation of action to move the noncomplying fuel assembly to a location within the limits specified in Table 3.7.14-1A (Unit 1). The CTS is changed to clarify the Action based upon the specific wording of the LCO to prevent a potential misinterpretation of the TS.	Actions	Actions
ITS 3.7.14 CTS 3.9.14	A.4	Unit 1 only. Unit 1 CTS Tables 3.9.1 and 3.9.2 contain the fuel assembly minimum burnup vs. initial U235 enrichment for storage in Regions 2 and 3 respectively. The corresponding ITS Table 3.7.14 - 1A presents this information in a single Table with some enhancement and clarification. Conformance to the ITS Table results in the following changes to the CTS: 1) The separate Unit 1 Tables are combined into a single Table, 2) The title of the Table column specifying the value of U-235 is clarified by the addition of "Nominal" and (w/o U-235), 3) A new column is added to the CTS Table to address the Region 1 storage locations in the spent fuel pool, and 4) Additional burnup values are specified in the ITS Table that are not specified in the CTS Table due to combining the separate CTS Tables.	Table 3.7.14-1A	Tables 3.9.1 & 3.9.2
ITS 3.7.14 CTS 3.9.14	A.5	Unit 2 only. Unit 2 CTS Table 3.9-1 is titled "FUEL ASSEMBLY MINIMUM BURNUP VS. U-235 NOMINAL ENRICHMENT FOR STORAGE IN SPENT FUEL RACK REGIONS 1,2,3." The title of the corresponding ITS Table 3.7.14 -1B is "Fuel Assembly Minimum	Table 3.7.14-1B	Table 3.9-1

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		Burnup versus U-235 Initial Enrichment for Storage in Spent Fuel Rack Regions 1, 2, and 3." The CTS Table title is revised to conform to the ITS Table title. This changes the CTS Table title by revising "nominal" enrichment to "initial" enrichment.		
ITS 3.7.16 CTS 3.9.14 (U1) CTS 3.9.15 (U2)	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.7.16	3.9.14 (U1) 3.9.15 (U2)

Table A
Administrative Changes
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.1, 3.8.3	3.8.1.1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.2	CTS LCO 3.8.1.1.b.1 requires a separate day and engine mounted tanks for Unit 1 containing a minimum of 900 gallons of fuel oil. Unit 2 LCO 3.8.1.1.b.1 requires a separate day tank containing a minimum of 350 usable gallons of fuel oil. Surveillance requirement 4.8.1.1.2.a.1 for both units requires the verification of level in the day tank and engine-mounted tank for Unit 1. ITS SR 3.8.1.4.1 and 3.8.1.4.2 require verification each DG day tank (and engine mounted tank on Unit 1 only) contains the required inventory of fuel oil. The inventory for Unit 1 day tank and engine mounted tank contain a combined total of ≥ 900 gal and for Unit 2 day tank ≥ 350 gal. Each SR is modified by a Note that states which unit the SR applies. This changes the CTS by stating the DG fuel oil requirements in the ISTS SR format.	SR 3.8.1.4.1 and 3.8.1.4.2	3.8.1.1.b.1, 4.8.1.1.2.a.1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.3	Unit 1 LCO 3.8.1.1 requirement 3.8.1.1.b.2 requires a separate fuel storage system containing a minimum of 17,500 usable gallons of fuel. Unit 2 LCO 3.8.1.1 requirement 3.8.1.1.b.2 for fuel storage system requires 53,225 gallons of fuel. Surveillance requirement 4.8.1.1.2.a.2 for each unit requires the verification of fuel level in the fuel storage tank. ITS SR 3.8.3.1 states “Verify each fuel oil storage tank contains: for Unit 1 ≥ 17,500 gal and for Unit 2 ≥ 53,225 gal.” This changes the CTS by stating the DG fuel oil requirements in the ISTS SR format.	SR 3.8.3.1	3.8.1.1.b.2, 4.8.1.1.2.a.2
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.4	LCO 3.8.1.1.b requires two separate and independent diesel generators to be OPERABLE. ITS LCO 3.8.1 b.2 states “Two diesel generators (DGs) capable of supplying the onsite Class 1E power distribution subsystem(s),” shall be OPERABLE. This changes the CTS by stating that the DGs are capable of supplying the required electrical power to the distribution subsystems that they serve.	3.8.1 b.2	3.8.1.1.b
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.5	LCO 3.8.1.1.a states two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be OPERABLE. ITS LCO 3.8.1.a states two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System shall be OPERABLE. This changes the CTS requirement by modifying the description of the offsite circuits from “physically independent” to the ITS requirement for the circuits description of “qualified.”	3.8.1.a	3.8.1.1.a
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.6	Not used.		

Table A
Administrative Changes
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.7	Unit 2 CTS LCO 3.8.1.1.b.4 and b.5 require lubricating oil storage system contain a specified volume and to have the capability to transfer lube oil from storage to the DGs. Unit 2 CTS surveillance requirement 4.8.1.1.2.a.8 requires the verification of the lubricating oil inventory in storage every 31 days. ITS LCO 3.8.3 states the stored diesel lube subsystem shall be within limits for each required DG. ITS SR 3.8.3.2 requires the verification of lubricating oil inventory every 31 days. This changes the Unit 2 CTS requirements by reformatting the technical requirements of the LCO and surveillance requirements and move them to ITS LCO 3.8.3 and SR.3.8.3.2. The change in lube oil volume required in the Unit 2 CTS is discussed in another DOC.	3.8.3 LCO, SR 3.8.3.2	3.8.1.1.b.4 and b.5, 4.8.1.1.2.a.8
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.8	CTS 3.8.1.1 Actions b, c, and e specify that the diesel generator requirement is modified by Note (1). Note 1 states "Required actions may be delayed for up to 7 days if the diesel generator(s) is inoperable solely due to the fuel oil contained in the storage tanks not meeting the properties in accordance with 4.8.1.1.2.d.2 or 4.8.1.1.2.e." The corresponding ITS requirement is contained in Action Condition C in the new ITS LCO 3.8.3. This new ITS Actions states; with one or more DGs with stored fuel oil total particulates not within limit, restore the total particulates within limit in 7 days. Failure to meet the ITS Action within 7 days results in the requirement to declare the affected diesel generator inoperable. The CTS is revised to conform to the ITS. This changes the CTS by moving the requirements of the CTS footnote into an ITS Action.	3.8.3, Action C	Actions b, c, and e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.9	CTS LCO 3.8.1.1 Action c states that if one offsite circuit and one diesel generator became inoperable, and the diesel generator inoperability is due to any cause other than an independently testable component, testing or preplanned preventative maintenance, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.5 within 8 hours unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated. Additionally, the Action requires the restoration of one of the inoperable sources (offsite or DG) to OPERABLE status within 12 hours. ITS Condition Required Actions D.1 and D.2 requires the restoration of a source (offsite or DG) within 12 hours. The Required Actions are modified by a note, which states, "Enter applicable Condition and Required Actions of LCO 3.8.9, "Distribution Systems – Operating," when Condition D is entered with no AC power source to any train." This changes the CTS by eliminating the specific requirements for an inoperable DG and adding a note that references the requirements for ITS LCO 3.8.9.	Actions D.1 & D.2	Action c
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.10	CTS Action c states that the other A.C. power source (offsite circuit or diesel generator) must be restored to OPERABLE status in accordance with the provisions of Action Statement a or b, as appropriate with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable A.C. power source. Additionally, a successful test of diesel OPERABILITY per Surveillance Requirement 4.8.1.1.2.a.5 must be performed under this Action Statement for an OPERABLE diesel or a restored to	Action D	Action c

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		OPERABLE diesel satisfies the diesel generator test requirement of Action Statement b. ITS Condition D does not contain these required actions. This changes the CTS by eliminating the specific requirements for an inoperable offsite circuit or DG.		
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.11	CTS Action d states that following restoration of one offsite source, Action Statement a with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable offsite A.C. circuit. ITS Condition C does not specific these required actions to be performed. This changes the CTS by deleting the stated requirement.	Action C	Action d
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.12	CTS Action e states that following restoration of one diesel generator unit, follow Action Statement b with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable diesel generator. A successful test of diesel OPERABILITY per Surveillance Requirement 4.8.1.1.2.a.5 performed under this Action Statement for a restored to OPERABLE diesel satisfies the diesel generator test requirement of Action Statement b. ITS Condition E does not contain these required actions. This changes the CTS by eliminating the specific requirements for two inoperable DGs.	Action E	Action e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.13	CTS Action e requires a demonstration of the OPERABILITY for two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter. ITS Condition E does not contain these required actions. This changes the CTS by eliminating the specific requirements for two inoperable DGs.	Action E	Action e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.14	CTS LCO 3.8.1.1 Actions a, b, c, d, and e provide an action to restoring an inoperable offsite circuit(s) and diesel generator(s) within specified times. If the required equipment can not be returned to OPERABLE status within the Action's allowed outage time, the unit is required to be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.8.1 Action G states that the Required Action and associated Completion Time of Condition A, B, C, D, E, and F are not met the unit must be placed in MODE 3 in 6 hours and MODE 5 in 36 hours. This changes the CTS by collecting all of the shutdown requirements into a single Action.	Action H	Actions a, b, c, d, and e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.15	CTS LCO 3.8.1.1 Action c states that if one offsite circuit and one diesel generator are inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; Additionally, the Action requires the restoration one of the inoperable sources (offsite or DG) to OPERABLE status within 12 hours. ITS Condition Required Actions D.1 and D.2 require the restoration of a source (offsite or DG) within 12 hours. This changes the CTS by eliminating the requirement for verifying the remaining A.C. sources within an hour and at least 8 hours thereafter.	Actions D.1 & D.2	Action c
ITS 3.8.1 ITS 3.8.3	A.16	CTS LCO 3.8.1.1 Actions a, b, c, d, and e provide an action to restoring an inoperable offsite circuit(s) and diesel generator(s) within specified times. The Actions limit the	Action I	Actions a, b, c, d, and e

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.8.1.1		inoperable AC sources to a total of two. CTS LCO 3.0.3 states when a Limiting Condition for Operation is not met except as provided in the associated Action requirements, within one hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in at least HOT STANDBY within the next 6 hours, at least HOT SHUTDOWN within the following 6 hours, and at least COLD SHUTDOWN within the subsequent 24 hours. ITS Condition H states that with three or more required AC sources inoperable LCO 3.0.3 must be entered immediately. This changes the CTS by specifically stating that LCO 3.0.3 must be entered for when 3 or more AC sources are inoperable.		
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.17	Unit 2 CTS Notes 4 and 6 for surveillance requirements 4.8.1.1.2.a.5, 4.8.1.1.2.b.3.b) and 4.8.1.1.2.f allow all diesel generator starts to be preceded by an engine prelube period (and warmup in Note 4 for the monthly start requirement). ITS SRs 3.8.1.2, 3.8.1.14, and 3.8.1.15 are modified by a Note that allows all Unit 2 DG starts may be preceded by an engine prelube period and warmup (for the monthly start requirement). The Corresponding Unit 1 Note 4 only allows for a warmup. The Unit 1 DGs do not have additional prelube steps that can be performed. As such Unit 1 does not have a corresponding Note 6 for prelube only. The Unit 1 provision for DG warmup is also retained in the applicable ITS surveillance Note. This changes the CTS by revising the CTS Notes to conform to the ISTS format in individual surveillance requirements.	SRs 3.8.1.2, 3.8.1.14, and 3.8.1.15	Notes 4 and 6 for 4.8.1.1.2.a.5, 4.8.1.1.2.b.3.b) and 4.8.1.1.2.f
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.18	Not used.		
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.19	CTS 3.8.1.1 does not contain an Action statement with a Required Action or associated Completion Time not met for DG fuel oil, lube oil, and starting air. ITS LCO 3.8.3 Condition F specifies for a Required Action and associated Completion Time not met or one or more DGs with diesel fuel oil, lube oil or starting air subsystem not within limits for reasons other than Conditions A, B, C, D, or E, the associated DG is declared inoperable immediately. This changes the CTS by specifically stating an associated DG must be declared inoperable.	3.8.3, Action F	NA
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.20	CTS 3.8.1.1 does not contain a note that specifies that each diesel generator may enter an Action separately. A Note modifies ITS LCO 3.8.3 Actions. The Note states, “Separate Condition entry is allowed for each DG.” This changes the CTS by specifically stating that a Condition may be entered for each required DG.	Action Note	NA
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.21	CTS 4.8.1.1.2.b states various surveillance requirements to be tested during shutdown. ITS SRs for LCO 3.8.1 addresses the MODE in which the requirement may be performed by a Note. This changes the CTS by incorporating the MODE restriction into a Note in the ITS SRs.	3.8.1, SRs	4.8.1.1.2.b

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.22	LCO 3.8.1.1 does not contain a requirement for the sequence timers associated with surveillance requirement 4.8.1.1.2.b.7. ITS LCO states “The following AC electrical sources and sequencer timer(s) shall be OPERABLE.” ITS LCO 3.8.1 part c requires the automatic load sequence timer(s) for each required DG. This changes the CTS by specifically stating the LCO requirement for the sequence timer(s).	LCO 3.8.1.c	NA
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.23	CTS Action b states “demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.5.” ITS Action B.3.2 states “Perform SR 3.8.1.2 for the OPERABLE DG.” This changes the CTS by stating the surveillance in ITS terms.	Action B.3.2	Action b
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.24	CTS 4.8.1.1.2.d and 4.8.1.1.2.e contain the requirements related to diesel fuel oil testing. The CTS surveillances specify the applicable limits and standards for the required testing. The corresponding ITS requirements are contained in ITS 5.5.9, Diesel Fuel Oil Testing Program. ITS SR 3.8.3.3 requires testing in accordance with the program. The ITS program in turn requires testing of diesel fuel oil in accordance with the applicable industry standards, and simply requires the results of specific surveillances to be within the required limit(s). The limits are contained in the applicable standards or have been moved to the Bases for ITS SR 3.8.3.3. This DOC is only intended to address the simplification of the CTS surveillances by referring to the required "limits" in lieu of stating each limit in the TS.	SR 3.8.3.3	4.8.1.1.2.d and 4.8.1.1.2.e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.25	CTS surveillances 4.8.1.1.2.d and 4.8.1.1.2.e contain the requirements related to diesel fuel oil testing. The CTS surveillances specify the applicable limits and standards for the required testing. The corresponding ITS SR 3.8.3.3 requires testing in accordance with ITS 5.5.9, Diesel Fuel Oil Testing Program. The details contained in the CTS surveillances are moved to ITS 5.5.9 or the Bases for ITS SR 3.8.3.3. The movement of requirements to the Bases of ITS SR 3.8.3.3 and other technical changes identified in the markup of CTS surveillances 4.8.1.1.2.d and 4.8.1.1.2.e are addressed by the DOCs associated with these changes. This DOC is only intended to address the consolidation of the two CTS Surveillances into a single ITS surveillance that references an administrative controls program in Section 5.0 of the TS.	SR 3.8.3.3	4.8.1.1.2.d and 4.8.1.1.2.e
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	A.26	The ITS 5.5.9, Diesel Fuel Oil Testing Program contains the requirements applicable to testing the diesel fuel oil, including the frequency of the required testing. These requirements were previously part of CTS surveillances 4.8.1.1.2.d and 4.8.1.1.2.e. As such, the diesel fuel oil testing requirements in CTS surveillances 4.8.1.1.2.d and 4.8.1.1.2.e were subject to the provisions of CTS 4.0.2 and CTS 4.0.3 that govern the use and application of surveillance requirements. In the ITS, SR 3.0.2 and SR 3.0.3 are the corresponding ITS specifications that govern the use and application of surveillance requirements. The diesel fuel oil surveillance requirements moved to ITS 5.5.9 are modified by a provision that states, "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies." The CTS surveillances	5.5.9	4.8.1.1.2.d and 4.8.1.1.2.e

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		are revised to show the inclusion of this ITS 5.5.9 provision consistent with the standard requirements in the ISTS.		
ITS 3.8.2 CTS 3.8.1.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.2	3.8.1.2
ITS 3.8.2 CTS 3.8.1.2	A.2	CTS LCO 3.8.2.1 part b for the diesel generator list the requirements for the day tank, fuel oil storage system, and fuel oil transfer pump. These are the same requirements for diesel generator OPERABILITY as required by CTS LCO 3.8.1.1. CTS surveillance requirement 4.8.1.2 states that 4.8.1.1.2 (surveillance requirements for AC Sources – Operating) is applicable for the required diesel generator in a shutdown condition. ITS SR 3.8.1.4.1 (Unit1) and ITS SR 3.8.1.4.2 (Unit 2) address the requirement for the day tank and engine mounted tanks (Unit 1) / day tank (Unit 2) and ITS SR 3.8.1.6 provides the requirement for fuel oil transfer pump. ITS LCO 3.8.3 provides the requirements for the DG support systems. ITS SR 3.8.3.1 ensures a sufficient supply of fuel oil is available for the DG when it is required to be OPERABLE. This changes the CTS by requiring the surveillance requirements for the DGs to be stated in the appropriate ITS SR.	SR 3.8.1.4, SR 3.8.1.6, LCO 3.8.3	3.8.2.1.b, 4.8.1.2
ITS 3.8.2 CTS 3.8.1.2	A.3	LCO 3.8.1.2.b requires one diesel generator to be OPERABLE. ITS LCO 3.8.2 b states “One diesel generator (DG) capable of supplying one train of the onsite Class 1E AC electrical power distribution subsystem(s)required by LCO 3.8.10,” shall be OPERABLE. This changes the CTS by stating that the DG is capable of supplying the required electrical power to the distribution subsystem(s) that are required by LCO 3.8.10.	3.8.2.b	3.8.1.2.b
ITS 3.8.2 CTS 3.8.1.2	A.4	LCO 3.8.1.2.a states one circuit between the offsite transmission network and the onsite Class 1E distribution system shall be OPERABLE. ITS LCO 3.8.1.a states one qualified circuit between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System shall be OPERABLE. This changes the CTS requirement by modifying the description of the offsite circuit to the ITS requirement for the circuit description of “qualified.”	3.8.1.a	3.8.1.2.a
ITS 3.8.2 CTS 3.8.1.2	A.5	Unit 1 LCO 3.8.1.2 applicability states MODES 5 and 6 and, “During movement of irradiated fuel assemblies and, During movement of fuel assemblies over irradiated fuel assemblies.” Unit 2 LCO 3.8.1.2 applicability states MODES 5 and 6 and, “During movement of recently irradiated fuel assemblies and, During movement of fuel assemblies over recently irradiated fuel assemblies.” ITS LCO 3.8.2 Applicability states MODES 5 and 6, “During movement of irradiated fuel assemblies and, during movement of fuel assemblies over irradiated fuel assemblies for Unit 1, During movement of recently	Applicability	Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		irradiated fuel assemblies and, during movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2." This changes the CTS by combining the applicability of LCO 3.8.2 into a requirement for each unit.		
ITS 3.8.2 CTS 3.8.1.2	A.6	Unit 1 LCO 3.8.1.2 Action in part states, "movement of irradiated fuel assemblies and movement of fuel assemblies over irradiated fuel assemblies." Unit 2 LCO 3.8.1.2 Action in part states, "movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies." ITS LCO 3.8.2 Actions A.2.2 and B.2 state "Suspend movement of irradiated fuel assemblies and movement of fuel assemblies over irradiated fuel assemblies" for Unit 1. ITS LCO 3.8.2 Actions A.2.3 and B.3 state "Suspend movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies" for Unit 2." This changes the CTS by combining the Actions of LCO 3.8.2 into a requirement for each unit.	Actions A.2.2, B.2, A.2.3 & B.3	Actions
ITS 3.8.2 CTS 3.8.1.2	A.7	CTS LCO 3.8.1.2 Action states with required AC sources inoperable, immediately suspend operations involving CORE ALTERATIONS, positive reactivity changes, and movement of fuel assemblies until the required AC sources are restored to OPERABLE status. A Note modifies ITS 3.8.2 Required Action A. The Note states "Enter applicable Conditions and Required Actions of LCO 3.8.10, with one required train de-energized as a result of Condition A." This changes the CTS by adding a Note for the Required Actions that would require the Conditions and Required Actions of LCO 3.8.10 to be entered if a bus becomes de-energized.	Action A Note	Action
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.9	3.8.2.1
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.2	CTS 3.8.2.1 for the Onsite Power Distribution Systems lists A.C. Distribution – Operating requirements. CTS LCO 3.8.2.1 states, "The following electrical busses shall be energized in the specified manner with tie breakers open between redundant busses within the unit." The requirement specifies 4 120-volt AC electrical buses are energized from their associated inverter. The inverter receives its power from the associated DC bus. ITS LCO 3.8.7, "Inverters – Operating" requires the A and B Train inverters to be OPERABLE. This changes the CTS by dividing the onsite AC power system into sources and distribution systems and specifying the inverters are to be OPERABLE.	LCO	LCO
ITS 3.8.7 ITS 3.8.9	A.3	Not used.		

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.8.2.1				
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.4	Not used.		
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.5	CTS LCO 3.8.2.1 Action c states, in part, that with one A.C. Vital Bus either not energized from its associated inverter, or with the inverter not connected to its associated D.C. Bus, re-energize the A.C. Vital Bus from its associated inverter connected to its associated D.C. Bus within 24 hours. ITS LCO 3.8.7 Action A states with one inverter inoperable, restore the inverter to OPERABLE status within 24 hours. Required Action A modified by a note that states, “Enter applicable Condition and Required Actions of LCO 3.8.9, “Distribution Systems – Operating,” with any AC vital bus de-energized.” This changes the CTS by adding a note that references the requirements for ITS LCO 3.8.9.	Action A Note	Action c
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.6	CTS 3.8.2.1 for the Onsite Power Distribution Systems lists A.C. Distribution – Operating requirements. CTS LCO 3.8.2.1 states, “The following electrical busses shall be energized in the specified manner with tie breakers open between redundant busses within the unit.” The requirement specifies two AC and four AC vital electrical buses. ITS LCO 3.8.9, “Distribution Systems – Operating” requires the A and B Train of the AC and AC vital bus electrical power distribution subsystems to be OPERABLE. This changes the CTS by dividing the onsite AC power system into sources and distribution systems and specifying the distribution systems for the AC and AC vital are to be OPERABLE.	LCO	LCO
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	A.7	CTS LCO 3.8.2.1 Action a states, in part, that with one of the required trains of A.C. emergency busses not fully energized, re-energize the train within 8 hours. ITS LCO 3.8.9 Action A states with one or more AC electrical power distribution subsystems inoperable, restore the AC electrical power distribution subsystem(s) to OPERABLE status within 8 hours. Required Action A modified by a note that states, “Enter applicable Condition and Required Actions of LCO 3.8.4, “DC Sources – Operating,” with any DC trains made inoperable by inoperable power distribution subsystems.” This changes the CTS by adding a note that references the requirements for ITS LCO 3.8.4.	Action A Note	Action a
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.8, 3.8.10	3.8.2.2
ITS 3.8.8	A.2	Unit 1 LCO 3.8.2.2 applicability states MODES 5 and 6 and, “During movement of irradiated fuel assemblies and, During movement of fuel assemblies over irradiated fuel	Applicability	Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.8.10 CTS 3.8.2.2		assemblies." Unit 2 LCO 3.8.2.2 applicability states MODES 5 and 6 and, "During movement of recently irradiated fuel assemblies and, During movement of fuel assemblies over recently irradiated fuel assemblies." ITS LCO 3.8.8 Applicability states MODES 5 and 6 and, "During movement of irradiated fuel assemblies and, during movement of fuel assemblies over irradiated fuel assemblies for Unit 1 and, During movement of recently irradiated fuel assemblies and, during movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2." This changes the CTS by combining the applicability of ITS LCO 3.8.8 into a requirement for each unit.		
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.3	Unit 1 LCO 3.8.2.2 Action in part states, "during movement of irradiated fuel assemblies and, during movement of fuel assemblies over irradiated fuel assemblies." Unit 2 LCO 3.8.2.2 Action in part states, "during movement of recently irradiated fuel assemblies and, during movement of fuel assemblies over recently irradiated fuel assemblies." ITS LCO 3.8.8 Action A.2.2 states "During movement of irradiated fuel assemblies and during movement of fuel assemblies over irradiated fuel assemblies for Unit 1, during movement of recently irradiated fuel assemblies, during movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2." This changes the CTS by combining the Action of LCO 3.8.8 into a requirement for each unit.	Action A.2.2	Actions
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.4	Not used.		
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.5	Not used.		
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.6	CTS LCO 3.8.2.2 states in part that at a minimum, one of the following trains of A.C. Busses shall be OPERABLE. Each train requires specific 4160, 480, and 120 VAC buses to be OPERABLE. The 120 VAC buses required inverter to supply the required electrical power. ITS LCOs 3.8.8, "Inverters – Shutdown," requires two inverters to be OPERABLE and 3.8.10, "Distribution Systems – Shutdown," requires the distribution systems necessary to support the necessary equipment to provide the required safety functions. This changes the CTS by dividing the AC distribution requirement during shutdown into the ITS LCOs for Inverters and Power Distribution System requirements.	LCOs	LCO
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	A.7	CTS 3.8.2.2 Action, in part, states "With less than the above required train of A.C. Emergency Busses not fully energized in the required manner, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes." CTS LCO 3.9.8.1 requires one RHR loop to be OPREABLE and in operation. CTS LCO 3.9.8.2 requires 2 RHR loops to be OPERABLE. ITS LCO 3.8.10 Required Action A.2.5 states "Declare	3.8.10 Action A.2.5	Actions

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		associated required residual heat removal subsystem(s) inoperable and not in operation." The Completion Time for this requirement is immediate. This changes the CTS by specifically stating this required Action.		
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.4, 3.8.6, 3.8.9	3.8.2.3
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.2	CTS LCO 3.8.2.3 states "The following D.C. bus trains shall be energized and OPERABLE:" with Train "A" and Train "B" components specified. ITS LCO 3.8.4, "DC Sources – Operating" states "The A Train and B Train DC electrical power subsystems shall be OPERABLE. This changes the CTS by classifying the "trained" components into a subsystem.	LCO 3.8.4	LCO
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.3	Unit 2 surveillance requirement 4.8.2.3.2.d requires a battery service test to be performed at least every 18 months*. The "*" specifies that the 18 month surveillance interval during the first fuel cycle may be extended to coincide with completion of the first refueling outage. ITS SR 3.8.4.3 states that a battery service test will be performed for each battery every 18 months. This changes the CTS by deleting the allowance for the first refueling period.	SR 3.8.4.3	4.8.2.3.2.d
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.4	CTS LCO 3.8.2.3 states the D.C. bus Train A and Train B shall be energized and OPERABLE. ITS LCO 3.8.9 requires the Train A and Train B DC electrical power distribution subsystems shall be OPERABLE. This changes the CTS by describing the DC bus train as the DC electrical power distribution subsystem.	LCO 3.8.9	LCO
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.5	CTS LCO 3.8.2.3 Action a states "With one of the required battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS LCO 3.8.4 Condition B requires with one or two batteries on one train inoperable, restore the inoperable batteries to OPERABLE status within 2 hours. ITS LCO 3.8.4 Condition C states that with one DC electrical power subsystem inoperable for reasons other than Condition A or B, restore the DC subsystem to OPERABLE status within two hours. ITS LCO 3.8.4 Condition D specifies when the Required Action and associated Completion Time are not met, the unit will be in MODE 3 in six hours and MODE 5 in 36 hours. This changes the CTS by dividing the batteries requirements into specific requirements for the batteries and the DC subsystems.	3.8.4 Action B, C, D	Action a
ITS 3.8.4	A.6	CTS LCO 3.8.2.3 Action a states "With one of the required battery banks inoperable,	3.8.9 Action C, D	Action a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3		restore the inoperable battery bank to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." ITS LCO 3.8.9 Condition C requires with one or more DC electrical power subsystems inoperable, restore the DC electrical power subsystem to OPERABLE status within 2 hours. ITS LCO 3.8.9 Condition D specifies with the Required Action and associated Completion Time not met, the unit must be placed in MODE 3 within six hours and in MODE 5 within 36 hours. This changes the CTS by stating the requirements for the DC sources in ITS terms.		
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.7	CTS LCO 3.8.2.3 Action a in part states with one of the required battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours. CTS surveillance requirements 4.8.2.3.2 requires the battery bank to meet the requirements listed in Table 3.8 – 1 for the battery cells. ITS 3.8.6 Action F states if the Required Action and associated Completion Time of Condition A, B, C, D, or E not met, or if one or two batteries on one train with one or more battery cells float voltage < 2.07 V and float current > 2 amps, declare associated battery inoperable immediately. This changes the CTS by stating the requirements in an ITS format.	3.8.6 Action F	Action a
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	A.8	CTS LCO 3.8.2.3 states that DC bus trains (Train A and Train B) shall be energized and OPERABLE in MODES 1, 2, 3, and 4. ITS LCO 3.8.6 states "Battery parameters for Train A and Train B batteries shall be within limits." The Applicability for the LCO is stated as "When associated DC electrical power subsystems are required to be OPERABLE." A Note modifies the ITS Actions and states "Separate Condition entry is allowed for each battery." This changes the CTS by stating the requirements in an ITS format.	LCO 3.8.6	LCO
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.8.5, 3.8.10	3.8.2.4
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.2	CTS LCO 3.8.2.4 requires the DC electrical equipment and busses to be OPERABLE and energized in a specific manner. Each train of DC is specified in terms in DC busses, battery banks, and chargers. ITS LCO 3.8.5 states "One DC electrical power subsystem shall be OPERABLE." This changes the CTS by stating the requirement in terms of a subsystem instead of individual components.	3.8.5 LCO	LCO
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.3	CTS LCO 3.8.2.4 requires the DC electrical equipment and busses to be OPERABLE and energized in a specific manner. Each train of DC is specified in terms of DC busses, battery banks, and chargers. ITS LCO 3.8.10 requires the necessary equipment to provide the required safety functions. This changes the CTS by addressing the DC distribution	3.8.10 LCO	LCO

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		requirement as the Power Distribution System requirements.		
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.4	CTS LCO 3.8.2.4 requires the DC electrical equipment and busses to be OPERABLE and energized in a specific manner. The Unit 1 applicability states "During movement of irradiated fuel assemblies, and during movement of fuel assemblies over irradiated fuel assemblies." The Unit 2 applicability states "During movement of recently irradiated fuel assemblies, and during movement of fuel assemblies over recently irradiated fuel assemblies." ITS LCOs 3.8.5 "DC Sources – Shutdown," and 3.8.10, "Distribution Systems – Shutdown," state the Applicability as "During movement of irradiated fuel assemblies and movement of fuel assemblies over irradiated fuel for Unit 1, and During movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel for Unit 2." This changes the CTS by combining the applicability of the ITS into a requirement for each unit.	Applicability	Applicability
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.5	Unit 1 LCO 3.8.2.4 Action in part states, "during movement of irradiated fuel assemblies and, during movement of fuel assemblies over irradiated fuel assemblies." Unit 2 LCO 3.8.2.4 Action in part states, "During movement of recently irradiated fuel assemblies and, During movement of fuel assemblies over recently irradiated fuel assemblies." ITS LCOs 3.8.5 and 3.8.10 Action A.2.2 states "During movement of irradiated fuel assemblies and, During movement of fuel assemblies over irradiated fuel assemblies" for Unit 1. ITS LCOs 3.8.5 and 3.8.10 Action A.2.3 states "During movement of recently irradiated fuel assemblies and, During movement of fuel assemblies over recently irradiated fuel assemblies" for Unit 2. This changes the CTS by combining the Actions of LCOs 3.8.5 and 3.8.10 into a requirement for each unit.	Action A.2.2 & A.2.3	Actions
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.6	CTS surveillance requirement 4.8.2.4.1 states "The above required 125-volt D.C. bus train shall be determined OPERABLE and energized at least once per 7 days 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 DC electrical power distribution subsystems. This changes the CTS by specifying that each required DC subsystem has the correct voltage for each of the required buses.	SR 3.8.10.1	4.8.2.4.1
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	A.7	CTS 4.8.2.4.2 states the required 125-volt battery bank and chargers shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.2. ITS SR 3.8.5.1 requires for the DC sources that must be OPERABLE, the following SRs are applicable. The SRs listed are: SR 3.8.4.1, SR 3.8.4.2, and SR 3.8.4.3. The Frequency of the required SRs is in accordance with the applicable SRs. This changes the CTS by stating the applicable surveillance requirements in terms of the ITS surveillance requirements and frequency.	SR 3.8.5.1	4.8.2.4.2

Table A
Administrative Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.9.1 CTS 3.9.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.1	3.9.1
ITS 3.9.1 CTS 3.9.1	A.2	CTS 3.9.1 provides requirements for the boron concentration of the Reactor Coolant System and the refueling canal. The ISTS provides requirements for the boron concentration of the Reactor Coolant System, the refueling canal, and the refueling cavity. The CTS is revised to conform to the ISTS requirements by the addition of the refueling cavity to the LCO requirements.	3.9.1	3.9.1
ITS 3.9.1 CTS 3.9.1	A.3	The phrase in the CTS 3.9.1 LCO, "all filled portions of the Reactor Coolant System and refueling canal" is eliminated consistent with the ISTS LCO requirements. This changes the CTS by eliminating the qualification for when the boron concentration specified in the LCO must be met for the refueling canal and the Reactor Coolant System.	LCO	LCO
ITS 3.9.1 CTS 3.9.1	A.4	The CTS LCO requirement for a “uniform” boron concentration is deleted consistent with the ISTS LCO wording. This changes the CTS by eliminating a further qualification of the LCO requirement.	LCO	LCO
ITS 3.9.1 CTS 3.9.1	A.5	CTS LCO 3.9.1 states that with the reactor vessel head unbolted or removed, the boron concentration must be within the limit provided in the LCO. The CTS 3.9.1 Applicability is modified by a footnote that states, “The reactor shall be maintained in MODE 6 when the reactor vessel head is unbolted or removed.” ISTS 3.9.1 does not include the phrase “with the reactor vessel head unbolted or removed” or the Applicability footnote. The CTS requirements are revised to be consistent with the ISTS. This changes the CTS by simplifying the Applicability.	Applicability	Applicability
ITS 3.9.1 CTS 3.9.1	A.6	CTS 3.9.1 Action contains the statement; “The provisions of Specification 3.0.3 are not applicable.” ISTS 3.9.1 does not contain an equivalent statement. The CTS is revised to be consistent with the ISTS. This changes the CTS by eliminating the exception to LCO 3.0.3.	Action	Action
ITS 3.9.2 CTS 3.9.2	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.2	3.9.2
ITS 3.9.2	A.2	CTS Action b requires that the boron concentration of the RCS be determined at least	Action	Action

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.9.2		once per 12 hours. The corresponding ISTS Action specifies that SR 3.9.1.1 is performed once per 12 hours. The CTS is revised to conform to the ISTS Action. This changes the CTS Action to refer to a surveillance requirement to verify the boron concentration.		
ITS NA CTS 3.9.3		**NONE**		
ITS 3.9.3 CTS 3.9.4	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.3	3.9.4
ITS 3.9.3 CTS 3.9.4	A.2	CTS 3.9.4 Action states, “The provisions of Specification 3.0.3 are not applicable.” The corresponding ISTS does not include this statement. ISTS LCO 3.0.3 states, “LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.” Therefore, in the ISTS, an exception to the provisions of LCO 3.0.3 in Mode 6 is not required. This changes CTS by deleting the exception to the provisions of 3.0.3.	NA	Action
ITS 3.9.3 CTS 3.9.4	A.3	(Unit 1 only) CTS surveillance 4.9.4.3 specifies that the required portions of filtered SLCRS shall be demonstrated OPERABLE per Specification 4.7.8.1 with exception to item 4.7.8.1.c.2. This Containment Penetrations surveillance requirement references the surveillances of a ventilation system TS. The corresponding ISTS does not include this requirement. The need for filtered containment purge exhaust is specific to BVPS Unit 1. However, consistent with the format and presentation of most of the ISTS this Mode 6 SLCRS operability requirement is being moved to the SLCRS TS in Section 3.7. In general, in the ISTS, the requirements applicable to a system or component are contained within the TS for that system or component and not in another TS. An operability requirement, consistent with the specific SLCRS requirements of CTS 3.9.4, will be added to the SLCRS TS in Section 3.7 (ITS 3.7.12 Applicability).	3.7.12 Applicability	4.9.4.3
ITS 3.9.3 CTS 3.9.4	A.4	(Unit 2 only) CTS 3/4.9.4 LCO requirement 3.9.4.c.2 specifies a condition of the containment penetrations that requires the penetration to be "Capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System with the containment air being exhausted through this system at a flow rate of ≤ 7500 cfm to at least one OPERABLE filtered SLCRS train". The corresponding ISTS LCO requirement does not contain a flow rate requirement. The proposed change moves the flow rate requirement for an operable containment purge and exhaust system into the corresponding surveillance requirement (ITS SR 3.9.3.1). The proposed change also reformats the CTS surveillance	SR 3.9.3.1	3.9.4.c.2

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		to incorporate the LCO requirements (including a note that specifies when the surveillance is applicable) consistent with the format and presentation of similar surveillances in the ISTS.		
ITS 3.9.3 CTS 3.9.4	A.5	(Unit 2 only) CTS Surveillance 4.9.4.2.b requires "Testing the Containment Purge and Exhaust Isolation Valves per the applicable portions of Specification 4.9.9". CTS Surveillance 4.9.9 requires the purge and exhaust valves to be demonstrated operable by verifying that the valves isolate manually and on a high radiation signal. CTS Surveillance 4.9.9 also requires that the isolation time of the valves be verified. ITS 3.9.3 instead of referencing a surveillance in another TS, specifies the required surveillances in SR 3.9.3.3 and SR 3.9.3.4. The CTS is revised to conform to the ITS. This changes the CTS by incorporating the previously referenced surveillance requirements of CTS 4.9.9 into the surveillance requirements of ITS 3.9.3 as SRs 3.9.3.3 and 3.9.3.4.	SR 3.9.3.3 and SR 3.9.3.4	4.9.4.2.b
ITS 3.9.3 CTS 3.9.4	A.6	(Unit 2 only) The proposed ITS SRs 3.9.3.3 and 3.9.3.4 which replace CTS 4.9.4.2.b are modified by a Note that states, "Not required to be met for containment purge and exhaust valve(s) in penetrations closed to comply with LCO 3.9.3.c.1." The addition of this ITS Note changes the CTS by clarifying the applicability of the surveillance requirements consistent with the requirements of ITS LCO 3.9.3.	SRs 3.9.3.3 and 3.9.3.4 Note	NA
ITS 3.9.4 CTS 3.9.8.1	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.4	3.9.8.1
ITS 3.9.4 CTS 3.9.8.1	A.2	The title and applicability of CTS 3/4.9.8.1 are revised consistent with the ISTS. The phrase “high water level” replaces “all water levels” in the title and the applicability is revised to add “with the water level greater than or equal to 23 feet above the reactor vessel flange” to Mode 6. This revision is consistent with the bases for the CTS. When the water level is equal to or greater than 23 feet above the reactor vessel flange a large heat sink is available for core cooling and adequate time exists to restore cooling if the single required RHR loop fails. Since CTS 3.9.8.2 (Low water level) is applicable when the water level is less than 23 feet above the reactor vessel flange it requires two operable RHR loops. As such, the appropriate applicability for CTS 3.9.8.1 (one RHR Loop required) is with the water level equal to or greater than 23 feet above the reactor vessel flange.	Title & Applicability	Title & Applicability
ITS 3.9.4 CTS 3.9.8.1	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. The corresponding ISTS Action states that with the RHR loop requirements not met suspend loading irradiated fuel assemblies in the core. The CTS is revised to conform to the ISTS.	Action A.2	Action a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		This changes the CTS by requiring that the loading of irradiated fuel assembles be suspended instead of requiring that all operations involving an increase in the reactor decay heat load be suspended.		
ITS 3.9.4 CTS 3.9.8.1	A.4	CTS 3.9.8.1 Action 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. The corresponding ISTS Actions state that with the RHR loop requirements not met, within 4 hours secure the equipment hatch with at least four bolts, close one door in each installed air lock, and close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, blind flange, or equivalent. The CTS is revised to conform to the ISTS. This changes the CTS Action by providing more specific directions in the Actions to close containment.	Action A.4, A.5 and A.6	Action a
ITS 3.9.4 CTS 3.9.8.1	A.5	CTS 3.9.8.1 Actions b and c specify that "the residual heat removal loop may be removed from operation for up to 1 hour per 8 hour period" and that " the residual heat removal loop may be removed from operation for up to 4 hours per 8 hour period during the performance of Ultrasonic In-service Inspection inside the reactor vessel nozzles." These CTS Actions are moved into notes that modify the LCO requirements for one RHR loop to be in operation. The placement of these CTS Actions in notes is consistent with the corresponding ISTS use of notes to modify the LCO requirements.	LCO Notes	Actions b & c
ITS 3.9.4 CTS 3.9.8.1	A.6	CTS 3.9.8.1 Action c states " The residual heat removal loop may be removed from operation for up to 4 hours per 8 hour period during the performance of Ultrasonic In-service Inspection inside the reactor vessel nozzles provided there is at least 23 feet of water above the top of the reactor vessel flange." There is no corresponding ISTS requirement for this BVPS specific allowance. However, when moved into the corresponding ISTS, this CTS requirement is changed by deleting "provided there is at least 23 feet of water above the top of the reactor vessel flange" from the requirement.	LCO Note	Action c
ITS 3.9.4 CTS 3.9.8.1	A.7	CTS 3.9.8.1 Action d states, "The provisions of Specification 3.0.3 are not applicable". The corresponding ISTS does not contain this provision. ISTS LCO 3.0.3 states, “LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.” Therefore, in the ISTS, an exception to the provisions of LCO 3.0.3 in Mode 6 is not required. This changes the CTS by deleting the exception to the provisions of 3.0.3 in CTS 3.9.8.1.	NA	Action d
ITS 3.9.4 CTS 3.9.8.1	A.8	Unit 1 only. A note that specifies "with fuel in the vessel" modifies the Unit 1 CTS 3.9.8.1 applicability of Mode 6. The corresponding ISTS applicability does not contain this note. The CTS footnote modifying the applicability is deleted consistent with the ISTS.	NA	Applicability Note
ITS 3.9.5	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications	3.9.5	3.9.8.2

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 3.9.8.2		(CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).		
ITS 3.9.5 CTS 3.9.8.2	A.2	In converting CTS 3.9.8.2 to the corresponding ISTS the following requirements are added to the CTS: 1) An LCO requirement for one RHR loop to be in operation, 2) Actions requirements for when no RHR loop is in operation, and 3) A surveillance to verify the required RHR loop is in operation. The addition of these requirements to CTS 3.9.8.2 (low water level) is a direct result of changing the applicability of CTS 3.9.8.1 from Mode 6 or all water levels to high water level only. The requirements being added to CTS 3.9.8.2 were previously contained in CTS 3.9.8.1 and applicable in Mode 6 at all water levels. Once the CTS 3.9.8.1 applicability was changed to high water level only, the requirements previously applicable at all water levels must now be repeated in CTS 3.9.8.2 (low water level) in order to maintain the same level of RHR TS requirements as before.	LCO, Action, SR	LCO, Action, SR
ITS 3.9.5 CTS 3.9.8.2	A.3	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. The corresponding ISTS Condition A, states that with less than the required number of RHR loops OPERABLE, immediately initiate action to restore required RHR loops to OPERABLE status or immediately initiate action to establish ≥ 23 feet of water above the top of reactor vessel flange. The CTS requirements are revised to conform to the ISTS. This changes the CTS by providing the option to exit the Applicability of the low water LCO and enter the high water LCO where only one RHR loop is required operable.	Action A	Action a
ITS 3.9.5 CTS 3.9.8.2	A.4	CTS 3.9.8.2 Action b states, “The provisions of Specification 3.0.3 are not applicable.” The corresponding ISTS does not include an exception to LCO 3.0.3. The CTS is revised to conform to the ISTS. This changes CTS by deleting an exception to LCO 3.0.3.	NA	Action b
ITS 3.9.5 CTS 3.9.8.2	A.5	CTS 3.9.8.2 LCO is modified by a footnote, *, which states that the normal or emergency power source may be inoperable for each RHR loop. The corresponding ISTS does not include this statement. The CTS is revised to conform to the ISTS. This changes CTS by deleting the allowance provided by the * footnote from CTS 3.9.8.2.	NA	* Footnote
ITS 3.9.3 ITS 3.3.6 CTS 3.9.9	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.3.6, 3.9.3	3.9.9

Table A
Administrative Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 3.9.3 ITS 3.3.6 CTS 3.9.9	A.2	(Unit 2 only) CTS surveillance 4.9.9 contains requirements to verify the operability of the containment purge and exhaust isolation valves (automatic and manual initiation and isolation time. The corresponding ISTS requirements for the purge and exhaust valves are contained in two separate TS. ITS 3.9.3 (CTS 3.9.4) contains the requirements for the isolation valves (actuation and timing) and ITS 3.3.6 contains the requirements for the purge and exhaust valve actuation instrumentation (manual and radiation monitor channels). The ISTS does not have a specification that corresponds to CTS 3.9.9. The CTS is revised to conform more closely to the ISTS. This changes CTS surveillance 4.9.9 by moving the valve actuation and timing requirements to ITS 3.9.3 (as SRs 3.9.3.3 and 3.9.3.4) and specific actuation instrumentation requirements to ITS 3.3.6.	SRs 3.9.3.3 and 3.9.3.4 & 3.3.6	4.9.9
ITS 3.9.6 CTS 3.9.10	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	3.9.6	3.9.10
ITS 3.9.6 CTS 3.9.10	A.2	CTS 3.9.10 Action states in part, “The provisions of Specification 3.0.3 are not applicable.” The corresponding ISTS does not include an exception to LCO 3.0.3. The CTS is revised to conform to the ISTS. This changes CTS by deleting an exception to LCO 3.0.3.	NA	Action

Table A
Administrative Changes
Section 4.0 - Design Features

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 4.0 CTS 5.0	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	4.0	5.0
ITS 4.0 CTS 5.0	A.2	The Unit 2 CTS Section 5.0 (ISTS 4.0) is marked up to include the Unit 1 differences (multiple inserts) from the corresponding Unit 1 pages. Each unit specific item is identified as applicable to one or the other unit. Common items are not marked as applicable to either unit.	4.0	5.0
ITS 4.0 CTS 5.0	A.3	The CTS Section 5.0 references to TS in Section 3.9 are revised to be consistent with the ITS. The TS referenced in CTS Section 5.0 address requirements for the spent fuel pool and are not contained in Section 3.9 in the ITS. As these TS are applicable in MODES other than Refueling, the ITS includes these requirements in Section 3.7, " Plant Systems".	4.0	5.0

Table A
Administrative Changes
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
ITS 5.0 CTS 6.0	A.1	In the conversion of the Beaver Valley Power Station current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering or order, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).	5.0	6.0
ITS 5.0 CTS 6.0	A.2	CTS 6.6, Reportable Event Action, specifies, in the case of a Reportable Event, that the Commission be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of 10 CFR 50.73. The ISTS does not include a corresponding reporting requirement. The requirements of CTS 6.6 are not included in the BVPS Units 1 and 2 ITS consistent with the ISTS. This changes the CTS by removing the requirements for Reportable Event Actions.	NA	6.6
ITS 5.0 CTS 6.0	A.3	CTS 6.3 includes the requirements for facility staff qualifications. ITS 5.3 includes the CTS 6.3 requirements for facility staff qualifications in Specification 5.3.1. ITS 5.3 also includes Specification 5.3.2, which states, “For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).” This changes the CTS by including this additional qualification (ITS 5.3.2).	5.3.2	6.3
ITS 5.0 CTS 6.0	A.4	CTS 6.8.1.b requires procedures for refueling operations and CTS 6.8.1.c requires procedures for surveillance and test activities. ITS 5.4.1 requires procedures for various activities, but does not specifically list refueling operations and surveillance and test activities. This changes the CTS by removing the explicit requirements for written procedures for refueling operations and surveillance and test activities.	5.4.1	6.8.1.b & c
ITS 5.0 CTS 6.0	A.5	CTS 6.8.1.h requires procedures for implementation of the OFFSITE DOSE CALCULATION MANUAL (ODCM). ITS 5.4.1 requires procedures for various activities, but does not specifically list the ODCM. This changes the CTS by removing the explicit requirements for written procedures for implementation of the ODCM.	5.4.1	6.8.1.h
ITS 5.0 CTS 6.0	A.6	CTS 6.17.b specifies, in part, the leakage rate acceptance criteria as the “air lock testing acceptance criteria and required action as stated in Specification 3.6.1.3 titled “Containment Air Locks.”” ITS 5.5.12.d denotes the specific air lock testing acceptance criteria specified in CTS 3.6.1.3. This changes the CTS by adding the specific air lock testing criteria and eliminating the reference to “required action.”	5.5.12.d	6.17.b
ITS 5.0 CTS 6.0	A.7	CTS 4.0.5 provides the Inservice Testing Program requirements. CTS 6.8.6.a provides the Radioactive Effluent Control Program requirements. Both of these CTS programs contain surveillance requirements for which Surveillance Frequency extensions applied. The ISTS applies Surveillance Frequency extension allowances to each of these programs. The	5.5.2, 5.5.4	4.0.5, 6.8.6.a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		CTS are revised to conform to the ISTS. This changes the CTS by providing a statement of applicability of ITS SR 3.0.2 (CTS 4.0.2) and ITS SR 3.0.3 (CTS 4.0.3) to ITS 5.5.2 (Radioactive Effluent Control Program) and a statement of applicability of ITS SR 3.0.3 (CTS 4.0.3) to ITS 5.5.4 (Inservice Testing Program).		
ITS 5.0 CTS 6.0	A.8	CTS 6.8.6 provides requirements for the Radioactive Effluent Controls Program. ITS 5.5.2 includes the same requirements for the Radioactive Effluent Controls Program, except that the CTS references to radiation exposure and dose are modified to reflect the revised 10 CFR 20 requirements.	5.5.2	6.8.6
ITS 5.0 CTS 6.0	A.9	Not used.		
ITS 5.0 CTS 6.0	A.10	CTS 6.9.5 includes a list of Technical Specifications (TS) for which core operating limits are established and documented in the CORE OPERATING LIMITS REPORT (COLR). ITS 5.6.5 includes a similar list of TS, but also includes LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," LCO 3.1.3, "Moderator Temperature Coefficient (MTC)," and LCO 3.9.1, "Boron Concentration."	5.6.5	6.9.5
ITS 5.0 CTS 6.0	A.11	CTS 6.17, Containment Leakage Rate Testing Program, exempts the requirements of CTS 4.0.2 from applying to the frequencies specified in the Primary Containment Leakage Rate Testing Program. ITS 5.5.12, Containment Leakage Rate Testing Program, does not include this explicit exemption of the requirements of ITS SR 3.0.2, but states that "nothing…shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J." This changes the CTS by replacing the explicit exemption of CTS 4.0.2 (ITS SR 3.0.2) with a more general statement.	5.5.12	6.17
ITS 5.0 CTS 6.0	A.12	CTS 4.0.5.a.1 and a.2 state inservice inspection and inservice testing required by 10 CFR 50.55a(g) and 10 CFR 50.55a(f) shall be performed. The ISTS does not include these requirements. The CTS are revised to conform to the ISTS. This changes the CTS by eliminating the explicit requirement to comply with the requirements of 10 CFR 50.55a(f) and 10 CFR 50.55a(g).	NA	4.0.5.a.1 and a.2
ITS 5.0 CTS 6.0	A.13	CTS 4.0.5.b includes a definition of inservice testing surveillance intervals. The CTS listing does not include a definition "Biennially or every 2 years. The ISTS requirements for inservice testing (5.5.4) do include a definition of the Frequency "Biennially or every 2 years. The CTS are revised to conform to the ISTS. This changes the CTS by adding a definition of "Biennially or every 2 years."	5.5.4	4.0.5.b
ITS 5.0 CTS 6.0	A.14	CTS 4.0.5 provides the Inservice Testing Program requirements. CTS 6.8.6.a provides the Radioactive Effluent Control Program requirements. Both of these CTS programs contain	5.5.2, 5.5.4	4.0.5, 6.8.6.a

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		surveillance requirements for which Surveillance Frequency extensions applied. The ISTS applies Surveillance Frequency extension allowances to each of these programs. The CTS are revised to conform to the ISTS. This changes the CTS by providing a statement of applicability of ITS SR 3.0.2 (CTS 4.0.2) and ITS SR 3.0.3 (CTS 4.0.3) to ITS 5.5.2 (Radioactive Effluent Control Program) and a statement of applicability of ITS SR 3.0.3 (CTS 4.0.3) to ITS 5.5.4 (Inservice Testing Program).		
ITS 5.0 CTS 6.0	A.15	CTS 4.0.5.d states that performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements. ITS 5.5.4 (Inservice Testing Program) does not include this statement. This changes the CTS by deleting the statement that performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.	5.5.4	4.0.5.d
ITS 5.0 CTS 6.0	A.16	CTS 4.4.5 (including Tables 4.4-1 and 4.4-2) provide steam generator tube inspection requirements. ITS 5.5.5 (and 5.6.6 for reporting requirements) includes these requirements in the Administrative Controls Chapter 5. As such, a general program statement has been added as ITS 5.5.5. Following the general program introduction, the BVPS Unit 1 (5.5.5.1) and Unit 2 (5.5.5.2) specific Steam Generator Tube Surveillance Program requirements are stated. This changes the CTS by including the CTS steam generator tube surveillance requirements in a Steam Generator Tube Surveillance Program in Section 5.0 of the ITS. The reporting requirements for each unit were moved to ITS Section 5.6.6. The CTS requirements are renumbered as necessary to conform to the new location for these requirements.	5.5.5, 5.6.6	4.4.5
ITS 5.0 CTS 6.0	A.17	CTS 4.7.7.1 and CTS 4.7.8.1 provide ventilation filter testing requirements for the Control Room Emergency Ventilation System and the Supplemental Leak Collection and Release System. ITS 5.5.7 includes these requirements in a program in the Administrative Controls Chapter 5. As such, a general program statement has been added as ITS 5.5.7. This changes the CTS by providing a Ventilation Filter Testing Program (VFTP). In addition, a statement of applicability of ITS SR 3.0.2 (CTS 4.0.2) and ITS SR 3.0.3 (CTS 4.0.3) is provided to clarify that the allowances for Frequency extensions do apply to the test described in the VFTP. Consistent with NUREG-1431, Section 5.0, “Administrative Controls” requirements are not explicitly covered by the allowances provided in Section 3.0, “LCO/SR Applicability.” Specific Frequency allowances must be directly stated in Section 5.0. As such, a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 was added consistent with the CTS allowances pertaining to CTS 4.7.7.1 and 4.7.8.1.	5.5.7	4.7.7.1 and 4.7.8.1
ITS 5.0 CTS 6.0	A.18	Unit 2 CTS 4.7.7.1.c and 4.7.7.1.d provide Frequencies for performing in-place testing and laboratory testing of the Control Room Emergency Ventilation System. For in-place testing, the Frequencies are “At least once per 18 months or (1) after each complete or	5.5.7	4.7.7.1.c and 4.7.7.1.d

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
		partial replacement of the HEPA filter or charcoal adsorber bank or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housing. For laboratory testing, the Frequencies are "At least once per 18 months or (1) after 720 hours of system operation or (2) following painting, fire, or chemical release in the vicinity of control room outside air intakes while the system is operating. ITS 5.5.7 specifies the Frequencies for in-place testing as "once per 18 months; after each complete or partial replacement of the HEPA filter or charcoal adsorber bank; after any structural maintenance on the HEPA filter or charcoal adsorber housing; and, following significant painting, fire, or chemical release in the vicinity of control room outside air intakes while the system is operating." ITS specifies the Frequencies for laboratory testing as "once per 18 months; after 720 hours of adsorber operation for the Control Room Emergency Ventilation System (CREVS); after any structural maintenance on the charcoal adsorber bank housing; and, following significant painting, fire, or chemical release in the vicinity of control room outside air intakes while the system is operating. This changes the CTS by adding the explicit Frequency, for in-place testing, of "following significant painting, fire, or chemical release in the vicinity of control room outside air intakes while the system is operating" and by adding the explicit Frequency, for laboratory testing, "or after any structural maintenance on the charcoal adsorber housing."		
ITS 5.0 CTS 6.0	A.19	CTS 4.7.7.1 and CTS 4.7.8.1 require certain ventilation filter testing following painting, fire, or chemical release in any ventilation zone communicating with the subsystems. For the CREVS, ITS 5.5.7 only requires testing if the painting, fire, or chemical release is "significant" and when it is in the vicinity of control room outside air intakes while the system is operating. For SLCRS, ITS 5.5.7 only requires testing if the painting, fire, or chemical release is "significant" and when it is in the vicinity of control room outside air intakes while the "filtration" system is operating. This changes the CTS by clarifying these ventilation filter tests are required to be performed following "significant" painting, fire, or chemical releases.	5.5.7	4.7.7.1 and 4.7.8.1
ITS 5.0 CTS 6.0	A.20	Unit 1 CTS 4.7.7.1.1.c.1 and 4.7.7.1.2.c.1 provide in-place testing requirements for the Unit 1 Control Room Emergency Ventilation System and the Unit 2 Control Room Emergency Ventilation System. The CTS groups both the HEPA filter and charcoal filter in-place testing surveillance requirements into one surveillance with one acceptance criteria for penetration and bypass leakage. ITS 5.5.7.a and 5.5.7.b provide separate surveillance requirements for the in-place testing requirement of the HEPA filter and for the in-place testing requirement of the charcoal adsorber. This changes the CTS by dividing the current in-place testing requirements, including acceptance criteria, into two separate requirements.	5.5.7.a and 5.5.7.b	4.7.7.1.1.c.1 and 4.7.7.1.2.c.1
ITS 5.0	A.21	CTS 4.8.1.1.2.d and 4.8.1.1.2.e provide diesel fuel oil testing requirements. ITS 5.5.9	5.5.9	4.8.1.1.2.d and

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 6.0		includes these requirements in a program in the Administrative Controls Chapter 5. As such, a general program statement has been added as ITS 5.5.9. The ITS also includes wording specific to the general descriptions of the diesel fuel oil testing specified in the Bases of ITS 3.8.3. This changes the CTS by providing a Diesel Fuel Oil Testing Program in the Administrative Controls Section of the Technical Specifications. In addition, a statement of applicability of ITS SR 3.0.2 (CTS 4.0.2) and ITS SR 3.0.3 (CTS 4.0.3) is provided to clarify that the allowances for Frequency extensions do apply to the test described in the Diesel Fuel Oil Testing Program. Consistent with NUREG-1431, Section 5.0, "Administrative Controls" requirements are not explicitly covered by the allowances provided in Section 3.0, "LCO/SR Applicability." Specific Frequency allowances must be directly stated in Section 5.0. As such, a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 was added consistent with the CTS allowances pertaining to CTS 4.8.1.1.2.d and 4.8.1.1.2.e.		4.8.1.1.2.e
ITS 5.0 CTS 6.0	A.22	CTS 6.8.6 states that "Limitations on the operability…" ITS 5.5.2 states "Limitations of the functional capability…" The CTS has been revised to clarify the text of the requirement. The word "operability" is used in the Technical Specifications as a defined term. The proposed change to the wording is to prevent a misinterpretation of the usage of the word "operability." The change does not result in technical changes and is designated as administrative.	5.5.2	6.8.6
ITS 5.0 CTS 6.0	A.23	CTS 4.8.1.1.2.d and 4.8.1.1.2.e provide diesel fuel oil testing requirements associated with the Operability requirements of the diesel generators. ISTS 5.5.13 (ITS 5.5.9) includes a program for these requirements. The CTS are revised to conform to the ISTS. This changes the CTS by adding the Diesel Fuel Oil Testing Program. This program is provided to implement required testing of both new and stored fuel oil. The specific wording associated with this program may be found in ITS 5.5.9.	5.5.9	4.8.1.1.2.d and 4.8.1.1.2.e
ITS 5.0 CTS 6.0	A.24	CTS 3.3.3.8 provides the Actions for inoperable Post Accident Monitoring (PAM) instrumentation. The corresponding ITS LCO 3.3.3 Required Action Conditions B and F reference Specification 5.6.5 for the appropriate Action. Specification 5.6.5 provides the details for preparing and submitting the report to the NRC. As such, the addition of this report to Section 5.0 is associated with the changes made to the PAM Technical Specification Actions.	5.6.5	3.3.3.8 Actions
ITS 5.0 CTS 6.0	A.25	CTS 6.17.a specifies the containment leakage rate acceptance criteria for the first unit startup following testing in accordance with the Containment Leakage Rate Testing Program. ITS 5.5.12.d provides a clarification that this criteria must be met "prior to MODE 4."	5.5.12.d	6.17.a
ITS 5.0	A.26	(Unit 2 only) CTS 4.7.7.1.d provides a general level of detail for the charcoal adsorber	5.5.7.c	4.7.7.1.d

Table A
Administrative Changes
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement
CTS 6.0		testing. ITS 5.5.7.c provides additional details specifying the use of a “slotted tube sampler.”		