

Table L
Less Restrictive Changes
Section 1.0 - Use and Application

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 1.0 CTS 1.0	L.1	The CTS definition of CHANNEL FUNCTIONAL TEST requires the use of a simulated signal when performing the test. The ISTS CHANNEL OPERATIONAL TEST (COT) definition allows the use of an actual or simulated signal when performing the tests. This changes the CTS by allowing the use of an actual signal instead of a simulated signal to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.	1.0 Definitions	1.11	Specific
ITS 1.0 CTS 1.0	L.2	The CTS definition for SHUTDOWN MARGIN (SDM) specifies that the single rod cluster assembly of highest reactivity worth is assumed to be fully withdrawn for calculating the SDM. The ISTS definition for SDM provides an exception to this requirement. The ISTS definition allows the following relaxation "with all RCCAs verified fully inserted by two independent means, it is not necessary to account for a stuck RCCA in the SDM calculation. The CTS definition is revised to incorporate the ISTS relaxation.	1.0 Definitions	1.13	Specific
ITS 1.0 CTS 1.0	L.3	The CTS average Coolant Temperatures specified in Table 1.1 for Refueling is revised consistent with the ISTS. The CTS Table specifies $\leq 140^{\circ}\text{F}$ for this Mode of operation. The corresponding ISTS Table 1.1-1 does not specify a temperature for Refueling Mode and "NA" is used instead of a temperature. As CTS Table 1.1 specifies the conditions of Applicable Modes, this change is considered a relaxation of Applicability.	1.0 Definitions	Table 1.1	2
ITS 1.0 CTS 1.0	L.4	Unit 2 Only. The CTS requirement for actuation logic test is revised to be consistent with the ISTS definition of ACTUATION LOGIC TEST. The CTS and ISTS requirements are effectively the same with the exception of the ISTS allowance to use "simulated or actual" input combinations. The CTS is revised to incorporate the ISTS relaxation. This changes the CTS by allowing the use of an actual signal instead of a simulated signal to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirement.	1.1 Definitions	Unit 2 - 3.4.3.2 (ESFAS)	Specific
ITS 1.0 CTS 1.0	L.5	Unit 2 only. The CTS requirement for slave relay testing is revised consistent with the ISTS definition of SLAVE RELAY TEST. The CTS requires that "a continuity check of associated actuation devices that are not testable" be performed during each SLAVE RELAY TEST. The less restrictive change introduced by the ISTS definition requirement is the allowance to only "include a continuity check of associated required testable actuation devices". This changes the CTS by not requiring a continuity check of actuation devices that are not testable.	1.1 Definitions	Unit 2 - 3.4.3.2 (ESFAS)	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 1.0 CTS 1.0	L.6	Unit 1 only. The CTS Section 1.0 definitions of ENGINEERED SAFETY FEATURE RESPONSE TIME and REACTOR TRIP SYSTEM RESPONSE TIME require measurement of the response time from the sensor through the actuated equipment. The ITS definitions of ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME and REACTOR TRIP SYSTEM (RTS) RESPONSE TIME are modified to state, " In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC." This changes the CTS by allowing the response time for selected components to be administratively verified rather than measuring the response time by testing provided BVPS has obtained NRC review and approval as specified in the statement added to the definition.	1.1 Definitions	1.22, 1.23	6

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
 Less Restrictive Changes
 Section 2.0 - Safety Limits

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
		NONE			

- * Change Categories:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
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Section 3.0 - LCO and SR Applicability

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.0 CTS 3/4.0	L.1	Not used.			
ITS 3.0 CTS 3/4.0	L.2	The CTS 3.0.5 two-hour Completion Time allowed for the verification of redundant system/component OPERABILITY is revised consistent with the ISTS LCO 3.8.1 Actions to 4 hours for an inoperable Diesel Generator (DG), 24 hours for an inoperable offsite circuit and 12 hours for two inoperable offsite circuits.	3.8.1 (Actions)	3.0.5	3
ITS 3.0 CTS 3/4.0	L.3	A new LCO 3.0.6 is added to the CTS to conform to the ISTS. LCO 3.0.6 specifies that when a support system is inoperable only the support system's ACTIONS are applicable. LCO 3.0.6 provides the allowance that the supported systems' ACTIONS are not applicable and need not be entered unless specifically directed by the support system's ACTIONS.	LCO 3.0.6	NA	Specific
ITS 3.0 CTS 3/4.0	L.4	CTS 4.0.2 contains a provision for extending the intervals associated with Surveillance Requirements. The corresponding ITS SR 3.0.2 expands the CTS provision for an interval extension to include some Action Completion Times.	SR 3.0.2	4.0.2	3

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.1	CTS 3.1.1.1 Actions state that when the SDM is less than the limit, boration must be initiated immediately. ITS 3.1.1 Action A states that when SDM is less than the limit, boration must be initiated within 15 minutes. This changes the CTS by relaxing the Completion Time to initiate boration from "immediately" to 15 minutes.	3.1.1 Action A	3.1.1.1 Actions	3
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.2	CTS 3.1.1.1 Actions state that when the SDM is not within its limit, boration must be initiated and continued ≥ 30 gpm of ≥ 7000 ppm boric acid solution or equivalent until the required SDM is restored. ITS 3.1.1 Action A states that with the SDM not within limit, initiate boration to restore SDM to within limit. This changes the CTS by eliminating from the Required Action the specific values of flow rate and boron concentration used to restore compliance with the LCO.	3.1.1 Action A	3.1.1.1 Actions	4
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.3	CTS Surveillance 4.1.1.1.1.c requires that SDM be verified at least once during control rod withdrawal and at least once per hour thereafter with $K_{eff} < 1.0$ (## footnote). The corresponding ISTS surveillance (SR 3.1.6.1) specifies that estimated critical control bank position be verified within the limits specified in the COLR within 4 hours prior to achieving criticality. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by moving the surveillance to the Control Bank Insertion Limits TS, eliminating the need for the ## footnote, and reducing the number of times that the surveillance is required to be performed during the approach to criticality.	SR 3.1.6.1	4.1.1.1.1.c	7
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.4	CTS Surveillance 4.1.1.1.1.d requires verification that SDM is within its limit, "Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e below, with the control banks at the maximum insertion limit of Specification 3.1.3.6." The ITS does not contain a similar requirement. The CTS is revised to conform to the ISTS.	NA	4.1.1.1.1.d	5
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.5	Not Used.			

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Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.6	CTS Surveillance 4.1.1.1.2 requires the overall core reactivity balance to be compared with the predicted value once per 31 EFPD. The CTS also requires the predicted reactivity values to be adjusted (normalized) to the actual core conditions prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. ITS SR 3.1.2.1 also requires the measured core reactivity to be compared to the predicted values every 31 EFPD, but the ITS SR is only required after 60 EFPD of core burnup. The ITS also allows the adjustment of the predicted values to the actual values prior to exceeding a fuel burnup of 60 EFPD after each fuel loading. This changes the CTS by not requiring the at-power core reactivity comparison until core burnup reaches 60 EFPD.	SR 3.1.2.1	4.1.1.1.2	7
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.7	CTS 3.1.1.1 addresses the requirement to maintain SDM within the required limits and contains requirements that pertain to the core reactivity balance. However, CTS 3.1.1.1 does not contain specific Actions that address the condition of the core reactivity balance requirements not met. Therefore, if the core reactivity balance Surveillance was not met, LCO 3.0.3 may be determined to be applicable. In the ISTS, a separate specification (ITS 3.1.2) is created for core reactivity that contains specific Actions designed for the condition of not meeting the core reactivity balance requirements. The new ITS Actions change the CTS by providing 7 days to evaluate and provide compensatory measures for not meeting the core reactivity balance requirements and then requiring entry into MODE 3 instead of requiring a relatively immediate shutdown and entry into MODE 5.	3.1.2 Actions	3.1.1.1 Actions	4
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	L.8	The CTS SDM Surveillance 4.1.1.1.2 requires the overall core reactivity balance be compared to predicted values to demonstrate agreement within +/- 1% $\Delta k/k$. The CTS SDM specification was applicable in Modes 1 through 4. ITS LCO 3.1.2 requires "the measured core reactivity shall be within $\pm 1\%$ $\Delta k/k$ of predicted values." The CTS is revised to conform to the ITS. This changes the CTS by creating a new LCO, for core reactivity requirements, that is applicable only in Modes 1 and 2 instead of Modes 1-4.	3.1.2 Applicability	3.1.1.1 Applicability	2
ITS 3.1.1 CTS 3.1.1.2	L.1	CTS 3.1.1.2 Actions state that when the SDM is less than the limit, boration must be initiated immediately. ITS 3.1.1 Action A states that when SDM is less than the limit, boration must be initiated within 15 minutes. This changes the CTS by relaxing the Completion Time to initiate boration from "immediately" to 15 minutes.	3.1.1 Action A	3.1.1.2 Actions	3

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Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.1 CTS 3.1.1.2	L.2	CTS 3.1.1.2 Actions state that when the SDM is not within its limit, boration must be initiated and continued ≥ 30 gpm of ≥ 7000 ppm boric acid solution or equivalent until the required SDM is restored. ITS 3.1.1 Action A states that with the SDM not within limit, initiate boration to restore SDM to within limit. This changes the CTS by eliminating from the Required Action the specific values of flow rate and boron concentration used to restore compliance with the LCO.	3.1.1 Action A	3.1.1.2 Actions	4
ITS-NA CTS 3.1.1.3		NONE			
ITS 3.1.3 CTS 3.1.1.4	L.1	CTS 3.1.1.4 Actions specify that when any of the MTC limits are not met the unit must be placed in Hot Standby (Mode 3) within 6 hours. The corresponding ISTS Actions address each MTC limit separately. The CTS Actions are revised consistent with the ISTS Actions. This changes the CTS by 1) Not requiring a 6-hour shutdown to Mode 3 when the MTC limit is not met and providing 24 hours in which to establish administrative rod withdrawal limits to maintain MTC within the required limit, and 2) If the first Action is not complete within 24 hours and a reduction in power is required, the unit is only required to be placed in Mode 2 with $K_{eff} < 1.0$ instead of Mode 3.	3.1.3 Action	3.1.1.4 Actions	4
ITS 3.1.8 CTS 3.1.2.9	L.1	CTS 3.1.2.9 Action 1 states: "Immediately suspend all operations involving positive reactivity changes, CORE ALTERATIONS or any use of the Primary Grade Water System with the Charging System." The corresponding BVPS specific ITS Action states that CORE ALTERATIONS and positive reactivity additions be suspended immediately. The proposed BVPS ITS Action is more consistent with the corresponding ISTS Actions. This changes the CTS by eliminating the Action requirement to immediately suspend any use of the primary grade water system with the charging system.	3.1.8 Action	3.1.2.9 Action	4
ITS 3.1.8 CTS 3.1.2.9	L.2	CTS 3.1.2.9 Action statement 3 requires that SDM be verified within 1 hour. The corresponding ISTS Action allows up to 4 hours for SDM to be verified. The CTS Action is revised to allow 4 hours to verify SDM consistent with the ISTS.	3.1.8 Action	3.1.2.9 Action	3

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.4 CTS 3.1.3.1	L.1	Unit 1 only. The CTS LCO 3.1.3.1 for rod alignment limits and rod operability states "all full length shutdown and control rods shall be OPERABLE and positioned within ± 12 steps (indicated position, as determined in accordance with Specification 3.1.3.2) of their group step counter demand position". The CTS LCO references Specification 3.1.3.2 for determining rod positions. The allowances provided by the notes in CTS 3.1.3.2 for the Unit 1 analog rod position indication system accuracy are simplified and moved into ITS Specification 3.1.4 for rod operability and rod alignment limits. The CTS notes are modified in two ways; 1) To clearly apply the one hour thermal soak time to all power levels instead of less than 50% and 2) The exception to ± 12 step requirement during rod insertion and withdrawal provided by the Mode 2 footnote is simplified to apply "during rod motion". A similar exception is proposed for the associated surveillance requirement. The standard TS in the ISTS for rod operability and alignment limits and rod position indication systems do not contain similar notes.	3.1.4 LCO and SR	3.1.3.1 and 3.1.3.2	1,7
ITS 3.1.4 CTS 3.1.3.1	L.2	CTS 3.1.3.1, Actions require satisfying the SHUTDOWN MARGIN (SDM) requirement. The corresponding ISTS Actions require verification that the SDM is within the limit or initiation of boration to restore SDM to within the limit. This changes the CTS by providing the additional option to initiate action to establish compliance with the SDM requirement within 1 hour.	3.1.4 Action	3.1.3.1 Action	4
ITS 3.1.4 CTS 3.1.3.1	L.3	CTS Action "c" states in part "with one full length rod trippable but inoperable due to causes other than addressed by ACTION a above, or misaligned from its group step counter demand position...." The corresponding ISTS Action states "one rod not within alignment limits". The CTS Action is revised to conform to the ISTS Action. This changes the CTS Action by eliminating references to rods that are trippable but inoperable for causes other than addressed by Action "a". CTS Action "a" addresses untrippable rods. By eliminating the condition of inoperable for causes other than untrippable, the focus of the CTS 3.1.3.1 is narrowed to address only untrippable and misaligned rods. As such CTS Action "c" is revised to only address a misaligned rod and references to inoperable rods are deleted from all sections of CTS Action c.	3.1.4 Action	3.1.3.1 Action	4
ITS 3.1.4 CTS 3.1.3.1	L.4	CTS 3.1.3.1, Action c.3.a) states in part that with one rod misaligned, THERMAL POWER must be reduced to $\leq 75\%$ of RATED THERMAL POWER within the hour. The corresponding ISTS 3.1.4 Action (B.2.2), requires THERMAL POWER to be reduced to $\leq 75\%$ RTP within 2 hours. The CTS Action Completion Time is revised to conform to the ISTS. This changes the CTS by changing the Completion Time from one hour to two hours.	3.1.4 Action	3.1.3.1 Action	3

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.4 CTS 3.1.3.1	L.5	CTS 3.1.3.1, Action c.3.a) requires that with one rod misaligned, THERMAL POWER be reduced to $\leq 75\%$ of RATED THERMAL POWER and that the high neutron flux trip setpoint be reduced to $\leq 85\%$ of RTP within the next 4 hours. The corresponding ISTS 3.1.4, Required Action B.2.2, requires THERMAL POWER to be reduced to $\leq 75\%$ RTP, but does not require the high neutron flux trip setpoint to be reduced. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the Required Action to reduce the high neutron flux trip setpoint.	3.1.4 Action	3.1.3.1 Action	4
ITS 3.1.4 CTS 3.1.3.1	L.6	CTS 3.1.3.1, Action c.3.d), states that when a rod is misaligned, POWER OPERATION may continue if a reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days. This re-evaluation shall confirm that the previous analyzed results of these accidents remain valid for the duration of operation under these conditions. The corresponding ISTS Action states that when one rod misaligned, re-evaluate the safety analyses and confirm results remain valid for the duration of operation under these conditions. The CTS is revised to conform with the ISTS. This changes the CTS by eliminating the specific list of accident analyses (Table 3.1-1) that must be re-evaluated. The ISTS Bases for this Action describes that the applicable safety analyses in the UFSAR must be re-evaluated.	3.1.4 Action	3.1.3.1 Action	4
ITS 3.1.4 CTS 3.1.3.1	L.7	CTS 3.1.3.1 Action d states in part " With more than one rod trippable but inoperable due to causes other than addressed by Action a above...." CTS Action a addresses rods that are inoperable because they are untrippable. The ISTS does not have an Action that corresponds to CTS Action d. The CTS is revised to conform to the ISTS. This change results in the deletion of CTS Action d. By eliminating the Action for rods inoperable for causes other than untrippable, the focus of the CTS 3.1.3.1 is narrowed to address only untrippable and misaligned rods.	NA	3.1.3.1 Action	4
ITS 3.1.4 CTS 3.1.3.1	L.8	CTS surveillance 4.1.3.1.1 requires the movement of rods ± 10 steps every 31 days to verify freedom of movement. The corresponding ISTS surveillance (SR 3.1.4.2) is only required to be performed every 92 days. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by extending the surveillance interval for verifying rod movement from 31 days to 92 days.	SR 3.1.4.2	4.1.3.1.1	7

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	L.1	CTS 3.1.3.2 Action a states that "with a maximum of one digital rod position indicator per bank inoperable...." The corresponding ISTS Action states "one DRPI inoperable per group...." The CTS Action is revised to be consistent with the ISTS Action. This changes the CTS by allowing one inoperable rod indicator per group instead of one inoperable rod indicator per bank.	3.1.7.2 Action	3.1.3.2 Action	4
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	L.2	CTS 3.1.3.2 does not have an action for more than one Rod Position Indicator Channel inoperable per group. CTS 3.0.3 would be entered in this condition. CTS 3.0.3 requires a shutdown to MODE 3 within 7 hours. ITS 3.1.7.2, Condition B, applies when more than one RPI per group is inoperable and requires the rods to be placed under manual control immediately, monitoring and recording of RCS T _{avg} once per hour, verification of rod position using the movable incore detectors once per 8 hours, and restoration of all but one RPI to OPERABLE status within 24 hours. This changes the CTS by allowing operation for an additional 24 hours with more than one RPI per group inoperable.	3.1.7.2 Action	3.1.3.2 Action	4
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	L.3	CTS 4.1.3.2.1 specifies that "each digital rod position indicator shall be determined to be OPERABLE by verifying that the Demand Position Indication System and the Digital Rod Position Indication System agree within 12 steps at least once per 12 hours". The ISTS does not contain a corresponding surveillance. The CTS is revised consistent with the ISTS by deleting CTS 4.1.3.2.1.	NA	4.1.3.2.1	5
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	L.4	CTS 4.1.3.2.2 requires that "each digital rod position indicator shall be determined to be OPERABLE by verifying that the digital rod position indicators agree with the demand position indicators within 12 steps over the full-range of indicated rod travel at least once per 18 months". The corresponding ISTS surveillance (ITS SR 3.1.7.2.1) requires that this surveillance be performed "once prior to criticality after each removal of the reactor head." The CTS surveillance frequency is revised to conform to the ISTS surveillance frequency. This changes the CTS by removing the fixed surveillance interval of 18 months and providing a frequency that requires the surveillance to be performed each time the reactor vessel head is removed.	SR 3.1.7.2.1	4.1.3.2.2	7

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.1	CTS 3.1.3.2 contains a footnote to the LCO requirement that states; " Malfunctions of the group demand counters or analog RPI, providing no actual rod misalignment existed during the malfunction, shall be reported". The corresponding ISTS does not contain any reporting requirements. The CTS is revised to conform to the ISTS. This changes the CTS by deleting the reporting requirement in the footnote.	3.1.7.1	3.1.3.2 LCO Note	8
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.2	<p>In CTS 3.1.3.2, the LCO requirement for the individual rod position indication system accuracy and the corresponding Action and surveillance requirements are modified by Notes that state " During the first hour following rod motion, the group demand counter is the primary indicator of precise rod position information, with the analog channels displaying general rod movement information. For power levels below 50%, a 1 hour thermal soak time is allowed before the analog channels are required to perform within the specified accuracy". In addition, the Mode 2 applicability requirement for CTS 3.1.3.2 Position Indicating Systems – Operating includes another note (# footnote) that provides a further exception to meeting the ± 12 step requirement during reactor startup and shutdown operations when the rods are being withdrawn or inserted.</p> <p>The CTS notes are modified in two ways; 1) To clearly apply the one hour thermal soak time to all power levels instead of those less than 50%. This is accomplished by revising the LCO and surveillance note to simply state that the verification of individual rod positions within the required ± 12 steps is not required for up to 1 hour following rod motion and, 2) The exception to ± 12 step requirement during rod insertion and withdrawal provided by the Mode 2 footnote is revised to simply apply "during rod motion". A similar exception is proposed for the alignment limit surveillance which also requires this level of indication accuracy. The ISTS does not have corresponding requirements.</p>	3.1.7.1 LCO, Action, SR	3.1.3.2 LCO, Action, SR	1, 4, 7
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.3	CTS 3.1.3.2 Action b.1 states "Verify that all rod position indicators for the affected bank are OPERABLE and that the most withdrawn rod and the least withdrawn rod of the bank are within a maximum of 12 steps (indicated position) of each other at least once per 8 hours." The corresponding ISTS Action does not specify that "indicated position" be used. The CTS Action is modified to delete the requirement to use "indicated position" consistent with the ISTS.	3.1.7.1 Action	3.1.3.2 Action	4

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.4	CTS 3.1.3.2 Action "c" is applicable " With a maximum of one analog rod position indicator per bank inoperable...." The corresponding ISTS Action allows one rod position indicator per group to be inoperable. The CTS is revised to incorporate the ISTS allowance for one rod per group to be inoperable. This changes the CTS by allowing more inoperable rod position indicators at any given time.	3.1.7.1 Action	3.1.3.2 Action	4
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.5	CTS 3.1.3.2 Actions c.1.a-e specify the requirements that must be met for each inoperable rod position indicator. The CTS Actions require that the rod position be verified by measuring primary voltage immediately and every 4 hours if rods are not fully inserted and once every 24 hours if the affected rods are fully inserted or withdrawn. In addition, the CTS Actions contain provisions to use the incore instrumentation to determine rod position if the rod position can not be determined by primary voltage measurements. When using the incore instrumentation the affected rod position must be determined once per 8 hours and immediately after movement exceeding 24 steps in one direction since the last determination of rod position. The corresponding ISTS Actions for an inoperable indicator require that rod position be verified using incore instrumentation every 8 hours and within 4 hours after rod movement in excess of 24 steps in one direction since the last determination of rod position. The CTS Actions c.1.a-e are revised to be more consistent with the ISTS Actions. The CTS Actions are replaced with proposed ITS Actions B.1 and D.1.	3.1.7.1 Actions	3.1.3.2 Actions	4
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.6	CTS 3.1.3.2 does not have an action for more than one Rod Position Indicator Channel is inoperable per group. CTS 3.0.3 would be entered in this condition. CTS 3.0.3 requires a shutdown to MODE 3 within 7 hours. ITS 3.1.7.1, Condition C, applies when more than one RPI per group is inoperable and requires the rods to be placed under manual control immediately, monitoring and recording of RCS T_{avg} once per hour, verification of rod position using the movable incore detectors once per 8 hours, and restoration of all but one RPI to OPERABLE status within 24 hours. This changes the CTS by allowing operation for an additional 24 hours with more than one RPI per group inoperable.	3.1.7.1 Actions	3.1.3.2 Actions	4

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.7	CTS 3.1.3.2 Action c.1.f states "If the position of more than one rod cannot be determined by either the direct reading of the rod position indicators or by reading primary detector voltage measurements, then Specification 3.0.3 is applicable." The ISTS does not have an Action that corresponds exactly with CTS Action c.1.f. The ISTS does, however, contain a default Action Condition (i.e., an Action that applies when the other Actions were not met within their required Completion Times). The ISTS default Action states "Required Action and associated Completion Time not met. Be in Mode 3 in 6 hours." The CTS Action c.1.f is replaced with the standard ISTS default Action for this TS. This changes the CTS by eliminating the reference to LCO 3.0.3 and only requiring the plant to be removed from the applicable Modes of the TS when the Actions and associated Completion Times are not met.	3.1.7.1 Actions	3.1.3.2 Actions	4
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.8	CTS surveillance 4.1.3.2.1.a states "Each of the group demand counters shall be determined to be OPERABLE by performing a CHANNEL CHECK by the group demand counters within a bank." The ISTS does not include this surveillance requirement. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance 4.1.3.2.1.a.	NA	4.1.3.2.1	5
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.9	CTS surveillance 4.1.3.2.2.a requires that the rod position indicators be verified operable by " Performing a CHANNEL CHECK by intercomparison** between each analog rod position indicator and its corresponding group demand counter at least once per 12 hours. The ** footnote provides a one hour thermal soak time below 50% power to allow the rod position indication (RPIs) to stabilize. The surveillance is performed to verify the LCO requirement for the RPIs to indicate within ± 12 steps of the demand position indicators. The ISTS does not include a corresponding surveillance in the RPI TS. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance 4.1.3.2.2.a.	NA	4.1.3.2.2.a	5
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.10	The CTS 3.1.3.2 # footnote to the Mode 2 applicability contains procedural guidance that is intended to assist in stabilizing the rod position indication within the one hour thermal soak time. The guidance states that "To attain thermal equilibrium during the one hour soak time, the absolute value of rod motion shall not exceed 6 steps." The corresponding ISTS does not contain any similar requirements or footnotes. The proposed change revises the statement in the BVPS specific footnote so that it reads "To attain thermal equilibrium during the one hour soak time, the absolute value of rod motion <i>SHOULD</i> not exceed 6 steps." This changes the CTS by relaxing the requirement to restrict rod motion during the one hour thermal soak period.	3.1.7.1 Applicability	3.1.3.2 # footnote	2

Table L
Less Restrictive Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	L.11	CTS surveillance 4.1.3.2.2.b requires " Verifying that the analog rod position indicators agree with the demand position indicators within 12 steps ⁽¹⁾ over the full-range of indicated rod travel at least once per 18 months." The corresponding ISTS surveillance (ITS SR 3.1.7.1.2) requires that this surveillance be performed "once prior to criticality after each removal of the reactor head." The CTS surveillance frequency is revised to conform to the ISTS surveillance frequency. This changes the CTS by removing the fixed surveillance interval of 18 months and providing a frequency that requires the surveillance to be performed each time the reactor vessel head is removed.	SR 3.1.7.1.2	4.1.3.2.2.b	7
ITS 3.1.4 CTS 3.1.3.4	L.1	CTS 3.1.3.4 contains the specific requirements for rod drop time testing. The CTS specifies an RCS (Tavg) temperature of $\geq 541^{\circ}\text{F}$. The corresponding ISTS requirement specifies a Tavg of $\geq 500^{\circ}\text{F}$. The CTS temperature requirement is revised to conform to the ISTS requirement. This changes the CTS by lowering the required temperature at which rod drop time must be verified. This change will allow drop time testing to begin earlier during a startup following a refueling outage.	3.1.4 Surveillance	3.1.3.4 LCO	1
ITS 3.1.4 CTS 3.1.3.4	L.2	CTS 3.1.3.4 contains the requirements for rod drop testing. CTS 3.1.3.4 specifies the Mode of Applicability for rod drop testing as Mode 3. The corresponding ISTS (3.1.4) specifies an Applicability requirement of Modes 1 and 2. The CTS is revised to conform to the ISTS. This changes the CTS by requiring the rod drop time requirement to be met in Modes 1 and 2 and not in Mode 3.	3.1.4 Applicability	3.1.3.4 Applicability	2
ITS 3.1.4 CTS 3.1.3.4	L.3	CTS 4.1.3.4 requires the rod drop time of full length rods to be demonstrated through measurement prior to reactor criticality for specifically affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods. The ISTS does not include this testing requirement. The CTS is revised to conform to the ISTS. This change deletes the CTS surveillance.	NA	4.1.3.4	5
ITS 3.1.4 CTS 3.1.3.4	L.4	CTS 4.1.3.4 requires the rod drop time of full length rods to be demonstrated through measurement prior to reactor criticality at least once per 18 months. The ISTS does not include the 18-month testing requirement. The CTS is revised to conform to the ISTS. This eliminates the CTS requirement 4.1.3.4.c to verify rod drop times every 18 months.	SR 3.1.4.3	4.1.3.4.c	7

Table L
Less Restrictive Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.5 CTS 3.1.3.5	L.1	CTS LCO 3.1.3.5 states, "All shutdown rods shall be within the insertion limits specified in the CORE OPERATING LIMITS REPORT." CTS 3.1.3.5, Action a, applies when one shutdown rod is inserted beyond the insertion limits and requires, within one hour, restoration of the rod to within the insertion limits or declare the rod to be inoperable and apply Specification 3.1.3.1. ISTS LCO 3.1.5 states, "Each shutdown bank shall be within insertion limits specified in the COLR." The Actions for ISTS 3.1.5 address one or more shutdown banks not within the limit. The CTS LCO and corresponding Actions are revised to be consistent with the ISTS. This changes the CTS by allowing more than one rod to be outside the insertion limits and including the appropriate Actions in the insertion limit specification instead of referencing Specification 3.1.3.1.	3.1.5 LCO and Actions	3.1.3.5 LCO and Actions	1,4
ITS 3.1.5 CTS 3.1.3.5	L.2	The CTS 3.1.3.5 Actions allow one hour to restore the affected rod to within the insertion limits or to declare the rod inoperable which will result in the verification of SDM within the following hour and provide actions that allow for continued operation. Under the CTS, more than one rod not within the insertion limits would result in an CTS 3.0.3 entry. CTS 3.0.3 allows one hour to prepare for a shutdown and requires the plant to be in MODE 3 within the following 6 hours. ISTS 3.1.5, Condition A, applies with one or more shutdown banks not within limits and requires SDM to be verified within one hour and allows 2 hours to restore the bank to within the insertion limits or requires the plant to be in MODE 3 in the following 6 hours. The CTS Actions are revised to conform to the ISTS Actions. This changes the CTS by allowing an extension of the Action time for restoring the out of limit condition (i.e., from 1 hour in the CTS to 2 hours in the ISTS).	3.1.5 Action	3.1.3.5 Action	3
ITS 3.1.5 CTS 3.1.3.5	L.3	CTS Surveillance 4.1.3.5 requires that the rods be verified within the insertion limits "within 15 minutes prior to withdrawal of any rods in control banks A, B, C, or D during an approach to reactor criticality." ITS 3.1.5 does not require verification that the shutdown rods are above the insertion limits within 15 minutes prior to criticality. This changes the CTS by eliminating the requirement that the shutdown banks be verified to be above the insertion limit within 15 minutes prior to criticality.	NA	4.1.3.5	5
ITS 3.1.6 CTS 3.1.3.6	L.1	The CTS 3.1.3.6 default Action statement c, (applicable when other Actions are not met) requires that the plant be placed in Mode 3 within 6 hours. The corresponding ISTS default Action (Condition C) requires that the plant be in Mode 2 with Keff < 1.0. The CTS is revised to conform to the ISTS. This changes the CTS by reducing slightly the shutdown Action requirements.	3.1.6 Action C	3.1.3.6 Action c	4

Table L
Less Restrictive Changes
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
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)	L.1	ITS 3.1.9 states that the number of required channels for LCO 3.3.1, "RTS Instrumentation," Functions 2, 3, 6, and 18.d, may be reduced to "3" required channels, during the performance of PHYSICS TESTS. The CTS (3.10.3 or 3.10.4) does not contain this allowance. The CTS is revised to conform to the ISTS. This changes the CTS by reducing LCO requirements for the number of Power Range Neutron Flux channels from "4" to "3" during PHYSICS TESTS initiated in MODE 2.	3.1.9 LCO	3.10.3 and 3.10.4 LCO	1
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)	L.2	CTS 4.10.3.2 requires that tests be performed on each Intermediate and Power Range channel within 12 hours prior to initiating PHYSICS TESTS. The corresponding ISTS surveillance (ITS SR 3.1.9.1) requires that the testing be performed prior to initiation of PHYSICS TESTS in accordance with the existing instrumentation TS (3.3.1) surveillances (ITS SR 3.3.1.6 and ISTS SR 3.3.1.7). The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the additional test required within a specific time prior to the initiation of PHYSICS TESTS.	SR 3.1.9.1	4.10.3.2	7
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)	L.3	CTS 3.10.4, PHYSICS TESTS, provides exceptions to several LCOs in order to perform routine post refueling outage physics testing. The corresponding ISTS PHYSICS TEST Exception (ITS 3.1.9) contains one additional exception that is not included in CTS 3.10.4. The ISTS Test Exception provides an exception to LCO 3.4.2, Minimum Temperature for Criticality. The ISTS also contains Action and surveillance requirements to verify and maintain the RCS temperature within the required limit. The Unit 1 CTS 3.10.4 is revised to conform with the ISTS test exceptions. This changes CTS 3.10.4 by adding the exception to the LCO minimum temperature for criticality.	3.1.9 LCO	3.10.4 LCO	1
ITS 3.1.10 CTS - NA		NONE			

Table L
Less Restrictive Changes
Section 3.1 - Reactivity Control Systems

- * Change Categories:
- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.2 - Power Distribution Limits

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.2.3 CTS 3.2.1		NONE			
ITS 3.2.1 CTS 3.2.2		NONE			
ITS 3.2.2 CTS 3.2.3	L.1	CTS 3.2.3, Action a states that when $F_{\Delta H}^N$ exceeds its limit, reduce THERMAL POWER to less than 50% RTP within 2 hours and reduce the Power Range Neutron Flux - High trip setpoints to less than 55% of RTP within the next 4 hours. The corresponding ISTS 3.2.2, Actions A.1 and A.2 state that with $F_{\Delta H}^N$ not within this limit, reduce THERMAL POWER to < 50% RTP within 4 hours and reduce the Power Range Neutron Flux - High trip setpoints to \leq 55% RTP within 72 hours. The CTS is revised to conform to the ISTS. This changes the CTS by allowing a 4-hour Completion Time to reduce power to < 50% RTP and 72 hours to reduce the trip setpoint.	3.2.2 Actions	3.2.3 Actions	3
ITS 3.2.2 CTS 3.2.3	L.2	CTS 3.2.3, Action b requires that if $F_{\Delta H}^N$ is not verified to be within the limit, THERMAL POWER must be reduced to less than 5% within the next 2 hours. The corresponding ISTS 3.2.2, Action B states that with the Required Action and associated Completion Time not met, be in MODE 2 within 6 hours. The CTS Action is revised to conform to the ISTS. This changes the CTS by allowing a 6 hour Completion Time to reduce power to < 5% RTP instead of 2 hours.	3.2.2 Action B	3.2.3 Action b	3
ITS 3.2.4 CTS 3.2.4	L.1	The CTS Action c requires the verification of peaking factors (perform surveillances 4.2.2.2, 4.2.2.3, and 4.2.3.1) within 24 hours and once per 7 days thereafter. The corresponding ISTS Action A.3 requires that the peaking factors be verified 24 hours after achieving equilibrium condition from a thermal power reduction per Required Action A.1 and once per 7 days thereafter. The CTS Action is revised to conform to the ISTS Action.	3.2.4 Action A.3	3.2.4 Action c	3

Table L
Less Restrictive Changes
Section 3.2 - Power Distribution Limits

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.2.4 CTS 3.2.4	L.2	The performance of CTS surveillance 4.2.4 is modified by two notes that specify the power level at which QPTR may be verified by calculation or by the use of the movable incore detectors. The notes are only applicable when one or more power range channel inputs are inoperable. CTS Note 2 currently specifies that with one inoperable power range channel input, QPTR may be performed by calculation if the power level is less than 75% RTP. CTS Note 3 specifies that with less than four operable power range channel inputs QPTR must be verified using the movable incore detectors with power greater than or equal to 75% RTP. The corresponding ISTS surveillance notes allow QPTR to be determined by calculation at power levels less than or equal to 75% RTP with the input from one power range channel inoperable. Conversely the ISTS only requires the use of movable incore detectors when one or more power range channels are inoperable at power levels greater than 75% RTP. The CTS is revised to be consistent with the ISTS. This changes the CTS by allowing QPTR to be determined by calculation at power levels up to and including 75% RTP instead of only less than 75% RTP. As such, the proposed change reduces the frequency at which QPTR must be verified by use of the movable incore detectors.	SR 3.2.4.1	4.2.4	7
ITS 3.2.4 CTS 3.2.4	L.3	CTS surveillance 4.2.4.a requires that QPTR be verified by calculation every 7 days. The corresponding ISTS surveillance SR 3.2.4.1 is similar to CTS 4.2.4.a except it is modified by Note 2 that allows SR 3.2.4.2 to be performed in lieu of verifying QPTR by calculation. SR 3.2.4.2 requires that QPTR be verified by use of the movable incore detectors. The CTS is revised to conform to the ISTS. This changes the CTS by providing the allowance to use a flux map to verify QPTR in place of performing a calculation based on the excore detector indications. Thus, the proposed change may reduce the number of calculations that must be performed when a flux map is available to substitute for the calculation.	SR 3.2.4.1	4.2.4.a	7

* Change Categories:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation of Surveillance Requirement Acceptance Criteria

Table L
Less Restrictive Changes
Section 3.2 - Power Distribution Limits

7 - Relaxation of Surveillance Frequency

8 - Deletion of Reporting Requirement

Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.1	<i>Unit 2 Only.</i> The CTS requirement for actuation logic test is revised to be consistent with the ISTS definition of ACTUATION LOGIC TEST. The CTS and ISTS requirements are effectively the same with the exception of the ISTS allowance to use "simulated or actual" input combinations. This changes the CTS by allowing the use of an actual signal instead of a simulated signal to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirement.	1.1 Definitions	3.3.1.1 Surveillance footnote 1	6
ITS 3.3.1 CTS 3.3.1.1	L.2	The following CTS RTS Functions: Function 9, Pressurizer Pressure Low, Function 11, Pressurizer Water level High, Function 13, Loss of Flow, Function 16, Undervoltage RCP Bus, Function 17, Under Frequency RCP Bus, and Function 20, RCP Breaker Position are interlocked with P-7. However, the Applicable Modes identified for these RTS Functions in Table 3.3-1 require that the Functions be maintained operable throughout Mode 1 operation and in some cases during Mode 2 as well. The corresponding Functions in ISTS Table 3.3.1-1 that are interlocked with P-7 have an Applicability specified that only requires the Functions to be operable in Mode 1 above the P-7 interlock. The affected CTS Functions are revised to conform to the ISTS Applicability of Mode 1 above the P-7 interlock. This changes the CTS by eliminating the current Applicable Mode requirements below the P-7 interlock.	Table 3.3.1-1 Functions	Table 3.3-1 Functions	2
ITS 3.3.1 CTS 3.3.1.1	L.3	CTS table 3.3-1 Note (1) states that the "trip function may be manually bypassed in this MODE above P-10." The CTS Note is used to modify the applicability for certain RTS Functions associated with the P-10 interlock. The corresponding ISTS Note (b) states; "Below the P-10 (Power Range Neutron Flux) interlocks. The ISTS Note is also used to modify the Applicability of RTS Functions associated with the P-10 interlock. The CTS is revised to conform to the ISTS. This changes the CTS by relaxing the Mode 1 applicability such that the RTS Functions are only required operable below the P-10 interlock.	Note (b)	Note (1)	2
ITS 3.3.1 CTS 3.3.1.1	L.4	The CTS Applicability for the Intermediate Range (IR) Neutron Flux RTS Function requires the Function Operable in Mode 1 (<P-10), Mode 2, and in Modes 3, 4, and 5 with the reactor trip breakers in the closed position and the control rod drive system capable of rod withdrawal. The ISTS applicability for the RTS IR Function only requires that Function operable in Mode 1 (<P-10) and in Mode 2 >P-6 (ISTS Note (c) to the Applicability). The CTS applicability is revised to conform to the ISTS applicability. This changes the CTS applicability by eliminating the requirement for the IR RTS Function to be operable below the P-6 interlock and adding ISTS Note (f) to the Mode 2 applicability.	IR Applicability	IR Applicability	2

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.5	CTS table 3.3-1 Note (2) states that the "trip function may be manually bypassed in this MODE above P-6." The CTS Note is used to modify the applicability for the Source Range Instrumentation RTS Function. The corresponding ITS Note (g) states; "Below the P-6 (Intermediate Range Neutron Flux) interlocks. The ISTS Note is also used to modify the Applicability of the Source Range RTS Function. The CTS is revised to conform to the ISTS. This changes the CTS by relaxing the Mode 2 applicability of the Source Range RTS Function such that it is only required operable below the P-6 interlock.	Note (g)	Note (2)	2
ITS 3.3.1 CTS 3.3.1.1	L.6	The CTS RTS Functions 18a and 18b, Turbine trip on low Emergency Trip Header pressure (Unit 2) or low Auto Stop Oil pressure (Unit 1) and Turbine Stop Valve Closure (both units) are interlocked with P-9. The Applicable Modes identified for these RTS Functions in Table 3.3-1 require that the Functions be maintained operable throughout Mode 1 operation. The corresponding Functions in ISTS Table 3.3.1-1 that are interlocked with P-9 have an Applicability specified that only requires the Functions to be operable in Mode 1 above the P-9 interlock. The affected CTS Functions are revised to conform to the ISTS Applicability of Mode 1 above the P-9 interlock. This changes the CTS by eliminating the current Applicable Mode requirement below the P-9 interlock.	Table 3.3.1-1 footnote (i)	Table 3.3-1 Functions	2
ITS 3.3.1 CTS 3.3.1.1	L.7	The Applicability for CTS Function 23a, Intermediate Range Neutron Flux P-6 interlock, is specified as Mode 2 on CTS Table 3.3-1. The Applicability of the corresponding ISTS P-6 interlock Function 18a on Table 3.3.1-1 is Mode 2 below the P-6 interlock. The ITS Mode 2 Applicability for the P-6 interlock is annotated by footnote (g) which specifies the interlock Function is only required operable in Mode 2 at power levels below the P-6 interlock. The CTS Applicability for the P-6 interlock is revised to conform to the ISTS Applicability. This changes the CTS by eliminating any requirements for the P-6 interlock to be operable in Mode 2 at power levels above the P-6 interlock setpoint.	footnote (g)	Function 23a Applicability	2

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.8	CTS Action 12, applicable to the manual reactor trip RTS Function, states " With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in HOT STANDBY within the next 6 hours and/or open the reactor trip breakers." The single CTS Action is revised to conform to the ISTS dual Action requirements (B & C) for this RTS Function. This changes the CTS by eliminating the requirement to open the reactor trip breakers in 48 hours from CTS Action 12 and allowing an additional 48 hours once in Mode 3 to repair the inoperable manual trip channel before requiring that all rods be fully inserted and the rod control system rendered incapable of rod withdrawal.	Action B & C	Action 12	3, 4
ITS 3.3.1 CTS 3.3.1.1	L.9	CTS Action 39, applicable to the reactor trip breaker and automatic trip logic RTS Functions in Modes 3, 4, and 5, states in part "restore the inoperable channel to OPERABLE status within 48 hours or open the reactor trip breakers within the next hour." The corresponding ISTS Action C requires that the inoperable channel be restored to operable status in 48 hours or initiate action to fully insert all rods and within the following hour (49 hours) place the rod control system in a condition incapable of rod withdrawal. The CTS Action is revised to conform to the ISTS Action. This changes the CTS by allowing an alternate means (other than open the reactor trip breakers) to be used to ensure the rods can not be withdrawn.	Action C	Action 39	4
ITS 3.3.1 CTS 3.3.1.1	L.10	CTS action 2.a.1 states "place the inoperable channel in trip within 6 hours and reduce THERMAL POWER to less than or equal to 75 percent RATED THERMAL POWER within the next 6 hours and perform SR 4.2.4." The corresponding ISTS Required Actions associated with Condition D only require that the channel be placed in trip in 6 hours and that power be reduced to $\leq 75\%$ RTP in the following 6 hours. The ISTS Actions do not specify the performance of any surveillance when power has been reduced to $\leq 75\%$ RTP. The ISTS only specifies the performance of a surveillance if the power has not been reduced. The CTS Action 2 is revised to be consistent with the corresponding ISTS Action Condition D. This changes the CTS by eliminating the Action reference to perform SR 4.2.4.	Action D	Action 2.a.1	4

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.11	<p>CTS Action 3, for the Intermediate Range (IR) Neutron Flux channels states: "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement and with the THERMAL POWER level: a) Below P-6, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 setpoint, b) Above P-6 but below 5 percent of RATED THERMAL POWER, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above 5 percent of RATED THERMAL POWER, and c) Above 5 percent of RATED THERMAL POWER, POWER OPERATION may continue. The corresponding ISTS Action Conditions F and G specify the following Actions: <u>Condition E</u> for a single inoperable channel requires that power be reduced below P-6 or increased above P-10 in 24 hours. <u>Condition G</u> for two inoperable channels requires that operations involving positive reactivity additions be suspended immediately and that power be reduced to below P-6 in two hours. The Actions for Condition G are modified by a Note that allows limited plant cooldown or boron dilution provided the change is accounted for in the Shutdown Margin (SDM). The CTS Actions are revised to conform to the ISTS Action Conditions F and G. This changes the CTS by 1) eliminating Action requirements for the IR channels below the P-6 interlock, 2) allowing the option to increase power above the P-10 interlock instead of holding power between P-6 and 5% RTP until the inoperable Channel is repaired, and 3) providing Actions for two inoperable IR channels.</p>	Actions F & G	Action 3	4
ITS 3.3.1 CTS 3.3.1.1	L.12	<p>CTS Action statement 4a for the Source Range RTS Function states "MODE 2 (Below P-6); with one source range neutron flux channel inoperable, immediately suspend operations involving positive reactivity additions." The corresponding ISTS Action Condition H contains the same requirements as CTS Action 4a to suspend positive reactivity additions immediately but the ISTS Condition is modified by a Note that states "Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated [Shutdown Margin] SDM." The CTS Action is revised to conform to the ISTS Condition. This changes the CTS by allowing limited plant cooldown or boron dilution to take place while in an Action that requires suspension of positive reactivity additions.</p>	Action H	Action 4.a	4

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.13	CTS Action statement 4b for the Source Range RTS Function states "MODE 3, 4 and 5; with one source range neutron flux channel inoperable, restore the inoperable channel to OPERABLE status within 48 hours or open the reactor trip breakers within the next hour." The corresponding ISTS Action Condition J requires that with one source range neutron flux channel inoperable, the inoperable channel be restored to OPERABLE status within 48 hours or initiate action to fully insert all rods and place the rod control system in a condition incapable of rod withdrawal in the next hour (49 hours). The CTS is revised to conform to the ISTS Action Condition. This changes the CTS by allowing an alternate means, in lieu of opening the reactor trip breakers, to be used to maintain all the rods fully inserted.	Action J	Action 4b	4
ITS 3.3.1 CTS 3.3.1.1	L.14	CTS Action 8 applicable to the turbine trip (stop valve closure) RTS Function states; "With the number of OPERABLE channels one less than the Total Number of Channels and with the THERMAL POWER level above P-9, place the inoperable channel in the tripped condition within 6 hours; operation may continue until performance of the next required CHANNEL FUNCTIONAL TEST." The corresponding ITS Action Condition L for the turbine trip RTS Functions also requires the inoperable channel be placed in the tripped condition. However, the ISTS Condition does not contain a limitation on operation until the performance of the next required Channel Functional Test. In addition, the ITS Condition contains the allowance to bypass an inoperable channel to allow testing of the other channels. The CTS Action 8 is revised to conform to the ITS Action Condition L. This changes the CTS Action by eliminating the provision that operation is limited to the performance of the Channel Functional Test and adding the provision that an inoperable channel may be bypassed for surveillance testing of other channels.	Action L	Action 8	4
ITS 3.3.1 CTS 3.3.1.1	L.15	CTS Action 11 specifies that the inoperable channel be placed in the trip condition. The corresponding ITS Action Condition K also requires the inoperable channel to be placed in the trip condition. However, the ITS Condition K includes a Note with the provision that the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels. The CTS Action is revised to conform with the ITS Action. This changes the CTS by allowing an inoperable channel to be bypassed to facilitate surveillance testing of the other channels.	Action K	Action 11	4

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.16	CTS Action 40b contains the requirements for an inoperable reactor trip breakers (RTBs). This CTS Action address RTBs that are inoperable for reasons other than a diverse trip feature. The CTS Action requires that the plant be placed in Mode 3 within 6 hours. The CTS Action does not allow any time for restoration. The corresponding ISTS Condition N applicable to the RTBs contains a 1-hour restoration time before requiring the plant to be placed in Mode 3. The CTS is revised to conform to the ISTS. This changes the CTS by allowing 1 hour to repair an inoperable RTB before requiring that a shutdown to Mode 3 begin.	Action N	Action 40b	3
ITS 3.3.1 CTS 3.3.1.1	L.17	Unit 1 only. CTS Action 3, for the P-6 RTS Interlock states: "With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement and with the THERMAL POWER level: a) Below P-6, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 setpoint, b) Above P-6 but below 5 percent of RATED THERMAL POWER, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above 5 percent of RATED THERMAL POWER, c) Above 5 percent of RATED THERMAL POWER, POWER OPERATION may continue. The corresponding ITS Action Condition O for the P-6 Interlock specifies the following Actions when one or more required channels are inoperable: Verify the interlock is in the required state for existing unit conditions within 1 hour or be in Mode 3 in 7 hours. The CTS Action is revised to conform to the ITS Action Condition O. This changes the CTS by providing a simple action to verify the interlock status, which can be done by visual observation of panel status lights, and eliminating requirements for restoring channels to operable status or restricting power increases.	Action O	Action 3	4
ITS 3.3.1 CTS 3.3.1.1	L.18	Unit 1 only. CTS Action 12, applicable to the Unit 1 P-8, P-9, P-10, and P-13 RTS Interlocks states: With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in HOT STANDBY within the next 6 hours and/or open the reactor trip breakers. The corresponding ITS Action Condition O and P for the RTS Interlocks specifies the following Actions when one or more required channels are inoperable: Verify the interlock is in the required state for existing unit conditions within 1 hour or ITS Condition O specifies be in Mode 3 in 7 hours and ITS Condition P specifies be in Mode 2 in 7 hours. The CTS Action is revised to conform to the ITS Action Condition O. This changes the CTS by providing a simple action to verify the interlock status, which can be done by visual observation of panel status lights, and eliminating requirements for restoring channels to operable status or opening the reactor trip breakers.	Action O & P	Action 12	4

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.19	<p>CTS Table 4.3-1 specifies the surveillance requirements for the RTS Functions. As part of the surveillance requirements, CTS Table 4.3-1 specifies the required modes for performing the surveillances. In the case of the Intermediate Range RTS Function, CTS Table 4.3-1 specifies Mode 1 for performing surveillances. The corresponding ISTS requirements for the RTS Function do not include a separate Table for surveillance requirements. All the requirements associated with an RTS Function are presented in ISTS Table 3.3.1-1. In addition the ISTS, does not require the Intermediate Range RTS Function to be operable above P-10 (approximately 10% RTP). CTS Table 3.3-1 which also contains Applicable Modes for the RTS Function specifies the Intermediate Range Function may be bypassed above P-10. The CTS applicable Mode specified in Table 4.3-1 for the Intermediate Range RTS Function is revised to conform to the ISTS and to be more consistent with the Mode specified on CTS Table 3.3-1. This changes the CTS by combining the requirements for the RTS Functions into a single Table and relaxing the current Mode 1 requirement for performing surveillances by the addition of Footnote (b) to Mode 1 which identifies that the Function is only required in Mode 1 below P-10.</p>	Intermediate Range Function Applicability	Table 4.3-1 Intermediate Range Function Applicability	2
ITS 3.3.1 CTS 3.3.1.1	L.20	<p>CTS Table 4.3-1 specifies the surveillance requirements for the RTS Functions. As part of the surveillance requirements, CTS Table 4.3-1 specifies the required modes for performing the surveillances. In the case of the Source Range RTS Function, CTS Table 4.3-1 specifies Mode 2 for performing surveillances. The corresponding ISTS requirements for the RTS Function do not include a separate Table for surveillance requirements. All the requirements associated with an RTS Function are presented in ISTS Table 3.3.1-1. In addition the ISTS, does not require the Source Range RTS Function to be operable above P-6 (approximately 9×10^{-11} amps). CTS Table 3.3-1 which also contains Applicable Modes for the RTS Function specifies the source Range Function may be bypassed above P-6. The CTS applicable Mode specified in Table 4.3-1 for the Source Range RTS Function is revised to conform to the ISTS and to be more consistent with the Mode specified on CTS Table 3.3-1. This changes the CTS by combining the requirements for the RTS Functions into a single Table and relaxing the current Mode 2 requirement for performing surveillances by the addition of Footnote (d) to Mode 2 which identifies that the Function is only required in Mode 2 below P-6.</p>	Source Range Function Applicability	Table 4.3-1 Source Range Function Applicability	2

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.21	<p>CTS Table 4.3-1 specifies the surveillance requirements for the RTS Functions. As part of the surveillance requirements, CTS Table 4.3-1 specifies the required modes for performing the surveillances. In the case of the Turbine Trip RTS Function, CTS Table 4.3-1 specifies Mode 2 for performing surveillances. The corresponding ISTS requirements for the RTS Function do not include a separate Table for surveillance requirements. All the requirements associated with an RTS Function are presented in ISTS Table 3.3.1-1. In addition the ISTS, does not require the Turbine Trip RTS Function to be operable below P-9 (49% RTP). In addition, CTS Table 3.3-1 only specifies Mode 1 for this RTS Function. The CTS applicable Mode specified in Table 4.3-1 for the Turbine Trip RTS Function is revised to conform to the ISTS and to be more consistent with the "Above P-9" permissive noted in the Function title on Tables 3.3-1 and 4.3-1. This changes the CTS by combining the requirements for the RTS Functions into a single Table and deleting the current Mode 2 requirement for performing surveillances.</p>	Turbine Trip Function	Table 4.3-1 Turbine Trip Function	2
ITS 3.3.1 CTS 3.3.1.1	L.22	<p>CTS Table 4.3-1 specifies the surveillance requirements for the RTS Functions. As part of the surveillance requirements, CTS Table 4.3-1 specifies the required modes for performing the surveillances. In the case of the P-6 RTS Function, CTS Table 4.3-1 specifies Mode 1 for performing surveillances. The corresponding ISTS requirements for the RTS Function do not include a separate Table for surveillance requirements. All the requirements associated with an RTS Function are presented in ISTS Table 3.3.1-1. In addition the ISTS, does not require the P-6 RTS Function to be operable above the P-6 setpoint (approximately 9×10^{-11} amps). CTS Table 3.3-1 which also contains Applicable Modes for the RTS Function only specifies that the P-6 Function be operable in Mode 2. The CTS applicable Mode specified in Table 4.3-1 for the P-6 RTS Function is revised to conform to the ISTS and to be more consistent with the Mode specified in CTS Table 3.3-1. This changes the CTS by combining the requirements for the RTS Functions into a single Table and deleting the current Mode 1 requirement for performing surveillances.</p>	P-6 Function Applicability	Table 4.3-1 P-6 Function Applicability	2
ITS 3.3.1 CTS 3.3.1.1	L.23	<p>CTS Table 4.3-1 specifies a Channel Functional Test (CFT) be performed on the Manual Reactor Trip Function prior to each startup, if not performed in the previous 31 days (Note 1) and once per Refueling Cycle. The corresponding ISTS requirement (SR 3.3.1.12) specifies that a TADOT be performed on this RTS Function once every 18 months. The ISTS surveillance requirement is modified by a note specifying verification of the setpoint is not required. The CTS surveillance requirements for the Manual Reactor Trip RTS Function are revised to conform to the ISTS. This changes the CTS by eliminating the requirement to perform a CFT on the Manual Reactor Trip Function prior to each startup if not performed within 31 days (Note 1).</p>	SR 3.3.1.12	Table 4.3-1 Note 1	7

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.24	The CTS surveillances for the Power Range Low setpoint and Intermediate Range RTS Functions specified in Table 4.3-1 require a Channel Functional Test (CFT) to be performed Prior to Startup (S/U) if not performed in the previous 31 days (Note 1). The corresponding ISTS surveillance SR 3.3.1.8 (BVPS ITS SR 3.3.1.7) also requires a Channel Operational Test (COT) prior to reactor startup. However, the ISTS Surveillance is modified by a Note that states the surveillance is only required if it has not been performed in the previous 92 days. The CTS surveillance requirements for these RTS Functions are revised to conform to the ISTS. This changes the CTS requirement to perform the surveillance prior to reactor startup such that the performance of the surveillance need not be repeated if it was performed within the previous 92 days instead of the previous 31 days.	SR 3.3.1.7	Table 4.3-1 Note 1	7
ITS 3.3.1 CTS 3.3.1.1	L.25	The CTS surveillances for the Under Voltage and Under Frequency RTS Functions specified in Table 4.3-1 require a quarterly Channel Functional Test (CFT). The corresponding ISTS surveillance requirements for these RTS Functions specify a quarterly Trip Actuating Device Operational Test (TADOT). The ISTS TADOT requirement is modified by a note that specifies that "verification of setpoint is not required". The CTS surveillance is revised to conform to the ISTS. This changes the CTS by adding a specific exception for setpoint verification when performing the quarterly functional test.	Under Voltage & Under Frequency Surveillance Note	Table 4.3-1 Under Voltage & Under Frequency Functions surveillance	6
ITS 3.3.1 CTS 3.3.1.1	L.26	The CTS surveillances for the Turbine Trip RTS Functions specified in Table 4.3-1 require a Channel Functional Test (CFT) performed prior to each startup. The CTS surveillance is modified by a note that specifies the surveillance is only required if not performed in the previous 31 days. The corresponding ISTS surveillance requirements for these RTS Functions specify a Trip Actuating Device Operational Test (TADOT) be performed prior to exceeding the P-9 interlock whenever the unit has been in Mode 3 if not performed in the previous 31 days. The ISTS TADOT requirement is modified by a note specifying "verification of setpoint is not required". The CTS surveillance is revised to conform to the ISTS. This changes the CTS by extending the frequency to perform the surveillance until the P-9 interlock (49% RTP) is reached instead of prior to startup and by adding a specific exception for setpoint verification when performing the functional test.	Turbine Trip Surveillance	Table 4.3-1 Turbine Trip Surveillance	6, 7

Table L
Less Restrictive Changes
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.1 CTS 3.3.1.1	L.27	The CTS surveillances for the RTB RTS Function specified in Table 4.3-1 require a Channel Functional Test (CFT) performed on each train every other month and prior to each startup if not performed in the previous 31 days (Note 1). The corresponding ISTS surveillance requirement for the RTB RTS Function (SR 3.3.1.4) only specifies a Trip Actuating Device Operational Test (TADOT) be performed every 31 days on a staggered Test Basis. The ISTS surveillance does not require an additional performance of the surveillance prior to each startup. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the requirement to perform the surveillance prior to each startup.	SR 3.3.1.4	Table 4.3-1 RTB CFT	7
ITS 3.3.1 CTS 3.3.1.1	L.28	The CTS surveillance requirements specified in Table 4.3-1 for the power range neutron flux high setpoint include a channel calibration performed every quarter. The surveillance is modified by a note that excludes the neutron detectors. The corresponding ISTS channel calibration requirement associated with the power range neutron flux high setpoint (SR 3.3.1.10) only requires the calibration to be performed every 18 months. The ISTS surveillance also contains a note that excludes the neutron detectors from the test. The CTS is revised to conform to the ISTS. This changes the CTS by reducing the frequency of the required channel calibration from quarterly to once per 18 months.	SR 3.3.1.10	Table 4.3-1 power range high trip Function SR	7
ITS 3.3.1 CTS 3.3.1.1	L.29	Unit 1 only. Unit 1 Functional Unit # 24, "Reactor Trip Bypass Breakers" includes a surveillance requirement to perform a functional test on the bypass breakers prior to startup (S/U) if not performed in the previous 31 days (Note 1). The corresponding ITS surveillance requirement applicable to the reactor trip bypass breakers (SR 3.3.1.4) specifies that the bypass breakers be tested prior to placing the bypass breaker in service but does not include the requirement to test the bypass breakers prior to startup. This changes the CTS by reducing the number of bypass breaker surveillance tests required.	SR 3.3.1.4	Table 4.3-1 Functional Unit # 24, Reactor Trip Bypass Breakers	7

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.1	CTS Action A addresses a single inoperable channel in one or more PAM Functions. The CTS Action is revised to extend the allowed restoration time of 7 days to 30 days. In addition, the CTS Action requirement to place the plant in Mode 4 if the affected channel is not restored to operable status is replaced with ITS Action Condition B. ITS Action Condition B requires that action be initiated immediately in accordance with Specification 5.6.5. Specification 5.6.5 requires that a report be sent to the NRC within 14 days outlining the pre-planned alternate method of monitoring the Function, the cause of the inoperability, and the plans and schedule for restoring the inoperable channel(s) of the Function to operable status. The proposed changes are consistent with the ISTS.	Actions A&B	Action A	3
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.2	CTS Action b addresses the condition of instruments with less than the minimum channels operable and requires the inoperable channel(s) to be restored to operable status in 48 hours or that the plant be placed in Hot Shutdown in the following 12 hours. The corresponding ITS Action Conditions C, D, E and F address one or more Functions with two or more inoperable channels. Required Action C.1 allows 7 days to restore all but one of the inoperable channels (which effectively leaves the inoperability within ITS Action Condition A for a single inoperable channel). Failure to meet Required Action C.1 results in entry into ITS Action Condition D. Required Action D.1 requires entry into the Action Condition referenced on Table 3.3.3-1 for the affected Function. Table 3.3.3-1 references either Condition E or F for the majority of Functions listed on Table 3.3.3-1. Most Functions listed on Table 3.3.3-1 are assigned Condition E. Action Condition E results in the plant being placed in Mode 4 within 12 hours similar to CTS Action b. As such, the addition of ITS Action Condition E does not introduce a significant change to the CTS. However, Action Condition F, assigned to two Functions on ITS Table 3.3.3-1, does not specify a plant shutdown. Action Condition F requires action to be initiated immediately in accordance with Specification 5.6.5. Specification 5.6.5 requires that a report be sent to the NRC within 14 days outlining the pre-planned alternate method of monitoring the Function, the cause of the inoperability, and the plans and schedule for restoring the inoperable channel(s) of the Function to operable status. Action Condition F is assigned to the Reactor Vessel Water Level and Containment Area Radiation (High Range) Functions on ITS Table 3.3.3-1.	Actions	Actions	3

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.3	The Total Number of channels for the Pressurizer Water Level PAM Function on Table 3.3-11 is currently specified as 3. The revised ITS Table 3.3.3-1 "Required Channels" specified for the Pressurizer Water Level PAM Function is 2. This change reduces the number of Pressurizer Water Level channels required to be operable on Table 3.3-11.	LCO	LCO	1
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.4	CTS Table 3.3-11 specifies a Total Channels requirement of 2 channels of Auxiliary Feedwater (AFW) Flow per Steam Generator (SG) for Unit 2 and 1 channel of AFW Flow per SG for Unit 1. The corresponding ITS requirement specifies 2 Required Channels of "Secondary Heat Sink Indication" for each SG for both Unit 1 and 2. The two channel ITS requirement is modified by footnote (d) which allows the requirement to be met by using any combination of AFW Flow and SG Water Level Narrow Range (NR). The addition of SG Water Level NR represents a new PAM Function not previously identified in the CTS. The CTS is revised to conform to the ITS. This changes the CTS by introducing a new PAM Function "Secondary Heat Sink Indication" that may be comprised of a combination of AFW Flow and SG Water Level NR channels for each SG. This change allows additional channels besides the AFW Flow channels (i.e., 3 channels of SG Water Level NR per SG) to be used to meet the LCO requirement of 2 operable "Secondary Heat Sink Indication" channels.	LCO	LCO	1
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.5	The containment area radiation monitor requirements include an Applicability of Modes 1, 2, 3, and 4 for the Containment Radiation Monitors. The corresponding PAM ITS Applicability is Modes 1, 2, and 3. The CTS is revised to conform to the ITS. This changes the CTS by eliminating the CTS Mode 4 applicability for the Containment Area Radiation Monitor indication function in the PAM ITS.	Applicability	Applicability	2

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.6	<p>CTS Action 35 states; "with the number of OPERABLE channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or: Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and Return the channel to OPERABLE status within 30 days, or, explain in the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner". The corresponding PAM ITS Actions provide Action Condition A for a single inoperable channel which allows 30 days to restore the inoperable channel before any other Actions must be taken. In addition, the ITS provides Action Condition C for two or more inoperable channels which allows 7 days to restore all but one channel to operable status before any other Action must be taken. If ITS Action Condition A is not met, ITS Action Condition B requires that action be initiated immediately in accordance with Specification 5.6.5 which requires that a report be submitted to the NRC within the following 14 days to outlining the inoperability, repair schedule, and alternate monitoring methods being used in place of the inoperable PAM instrumentation. If ITS Condition C is not met, ITS Condition D requires that ITS Condition F be entered immediately. ITS Condition F requires that action be initiated immediately in accordance with Specification 5.6.5 which requires a report as described above. The CTS is revised to conform to the ITS.</p>	Actions	Actions	3
ITS 3.3.3 CTS 3.3.3.8 3.3.3.1	L.7	<p>The CTS Channel Check surveillance for the Containment Area Radiation Monitors is required to be performed once per shift or once per 12 hours. The corresponding PAM ITS Channel Check is required to be performed on a monthly basis. Therefore, the proposed change to move the containment area radiation monitor indication function to the PAM Technical Specification revises the applicable Channel Check surveillance from a 12-hour interval to a monthly interval.</p>	Channel Check SR	Channel Check SR	7

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.4 CTS 3.3.3.5	L.1	Unit 2 only. CTS LCO 3.3.3.5 requires instrumentation channels to be OPERABLE for the remote shutdown panel for various parameters. The Action requires "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 states "The Remote Shutdown System Function shall be OPERABLE. ITS LCO 3.3.4 Action A states "One or more required Functions inoperable, restore required Function to OPERABLE status," with an allowed Completion Time of 30 days. ITS Action B is entered if the Required Action cannot be accomplished within the allowed time. ITS Condition B states "Required Action and associated Completion Time not met." Required Action B.1 requires the unit to be in MODE 3 in 6 hours and MODE 5 in 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by allowing 30 days instead of 7days for a remote shutdown Function to be inoperable before requiring the unit to shutdown.	Actions A&B	3.3.3.5 Action	4
ITS 3.3.4 CTS 3.3.3.5	L.2	Not used.			
ITS 3.3.4 CTS 3.3.3.5	L.3	CTS surveillance requirement 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." The CTS Source Range Channel Check requirements on Table 4.3-6 are modified by CTS Note 4 that states "Below P-6." The corresponding ITS LCO SR 3.3.4.1 states "Perform CHANNEL CHECK for each required instrumentation channel that is normally energized." ITS Table 3.3.4-1 in the ITS Bases lists the instrumentation channels for which ITS SR 3.3.4.1 applies but does not include any notes modifying the Source Range Instrument requirements. The CTS surveillance requirements are revised to conform to the corresponding ISTS surveillance requirement. This changes the CTS by specifying a CHANNEL CHECK be performed for each required channel only if the channel is normally energized. In addition, the proposed change eliminates the Note modifying the Source Range instrument Channel Check.	SR 3.3.4.1	4.3.3.5, Table 4.3-6 Note 4	6

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.4 CTS 3.3.3.5	L.4	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." CTS Table 3.3-9 specifies required channels for the Intermediate Range, Source and Intermediate Range Startup Rate and RHR Heat exchanger outlet temperature. CTS Surveillance Requirement 4.3.3.5 specifies the applicable Channel Checks and Channel Calibrations for these Remote Shutdown System instruments. The RHR HX outlet temperature requirements for both units are modified by notes referring to the RCS Section of the TS for operability guidance and surveillance requirements. The corresponding ITS LCO 3.3.4 requirements described in ITS Bases Table 3.3.4-1 does not list the Intermediate Range, Source and Intermediate Startup Rate, or the RHR heat exchanger outlet temperature as required instrument channels. The CTS is revised to conform to the ITS requirements. This changes the CTS by deleting the requirements pertaining to the Intermediate Range indication, Source and Intermediate Range Startup Rate indication and RHR heat exchanger outlet temperature indication (including notes) from the Remote Shutdown System TS.	3.3.4 LCO	3.3.3.5 LCO	1
ITS 3.3.4 CTS 3.3.3.5	L.5	Unit 2 only. CTS LCO 3.3.3.5 specifies pressurizer pressure as one of the remote shutdown panel indications required operable. The corresponding ISTS requirements in Bases Table 3.3.4-1 specify that either pressurizer pressure or RCS wide range pressure indication be operable. As the Unit 2 emergency shutdown panel includes both pressurizer pressure and RCS wide range pressure, the Unit 2 CTS requirements are revised to conform to the ISTS requirements. Note, the Unit 1 emergency shutdown panel does not include RCS wide range pressure indication. This changes the Unit 2 CTS requirements by providing an option to use either pressure indication to meet the LCO requirements.	3.3.4 LCO	3.3.3.5 LCO	1
ITS 3.3.5 CTS 3.3.2.1	L.1	Unit 2 only. The Unit 2 ESFAS Functional Unit 6.a.1 (Undervoltage - Trip Feed) in Table 3.3-3 is assigned Action Statement 33 in the CTS. This Unit 2 loss of power function consists of two channels. CTS Action statement 33 is applicable to instrument functions that consist of only a single channel. The proposed change revises the Actions for the Unit 2 ESFAS Functional Unit 6.a.1 (Undervoltage - Trip Feed) in CTS Table 3.3-3 to be consistent with the other loss of power instrument functions with two required channels (i.e., more time is allowed to place the affected channel in trip).	Actions B, C & E	Action 33	3

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.5 CTS 3.3.2.1	L.2	CTS Action 33 applies when one loss of power channel is inoperable and requires that the associated DG be declared inoperable immediately. The corresponding ITS Action Condition D is also applicable to a single inoperable channel but allows one hour to restore the inoperable channel to operable status prior to declaring the associated DG inoperable. The CTS Action is revised to conform to ITS Action Condition D (similar to ISTS Action Condition B). This changes the CTS by providing an additional hour to restore the inoperable channel.	Action D	Action 33	3
ITS 3.3.5 CTS 3.3.2.1	L.3	CTS Action 34 requires that "With the number of OPERABLE channels one less than the Minimum Number of Channels, place the inoperable channel in the tripped condition within 1 hour...." The corresponding ISTS Action Condition A (ITS Condition B) provides a 6 hour completion time to place a channel in trip. The CTS Action is revised to conform to the ISTS. This changes the CTS by providing additional time to place an inoperable channel in trip.	Action B	Action 34	3
ITS 3.3.5 CTS 3.3.2.1	L.4	CTS Action 34 requires that an inoperable loss of power channel be placed in the trip condition and allows operation to continue with the affected channel in trip. The corresponding ITS Action Condition B is similar except for the Required Action Note that states, "The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels provided the corresponding instrument channels, electrical bus, and DG in the other train are OPERABLE." The CTS is revised to conform to the ITS. The proposed change provides an allowance to perform routine surveillance testing of the remaining operable channel on an electrical bus when one of the two channels on that bus is in trip.	Action B	Action 34	4
ITS 3.3.5 CTS 3.3.2.1	L.5	The CTS surveillances for the loss of power Functions specified in Table 4.3-2 require a quarterly Channel Functional Test (CFT). The corresponding ITS surveillance requirement for this ESFAS Function (SR 3.3.5.5) specifies a quarterly Trip Actuating Device Operational Test (TADOT). The ITS TADOT requirement is modified by a note that specifies that verification of setpoints is not required. The CTS surveillance is revised to conform to the ITS. This changes the CTS by adding a specific exception for setpoint verification when performing the quarterly functional test.	SR 3.3.5.5	Table 4.3-2	6

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	L.1	Unit 2 only. CTS surveillance 4.9.9 requires testing the containment purge and exhaust isolation valve actuation (by radiation monitor and manual) every 7 days. ITS 3.3.6 specifies the requirements for the manual initiation capability for the containment purge and exhaust valves. The corresponding ITS surveillance (SR 3.3.6.3) requires that the manual isolation capability of the containment purge and exhaust valves be verified every 18 months by a Trip Actuating Device Operational Test (TADOT). The CTS is revised to conform to the ITS. This changes the CTS manual actuation verification surveillance interval from every 7 days to once per 18 months.	SR 3.3.6.3	4.9.9	7
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	L.2	Unit 2 only. CTS 3.3.3.1 Action a states "With a radiation monitoring channel alarm/trip setpoint exceeding the value shown in Table 3.3-6, adjust the setpoint to within the limit within 4 hours or declare the channel inoperable." CTS Action b states "With one or more radiation monitoring channels inoperable, take the ACTION shown in Table 3.3-6." CTS Table 3.3-6 refers the user to Specification 3.9.9 for the appropriate Action. The CTS 3.9.9 Action requires the purge and exhaust penetrations to be isolated. The corresponding ITS LCO 3.3.6 Condition A states "One radiation monitoring channel inoperable." Required Action A.1 states "Restore the affected channel to OPERABLE status," with a Completion Time of 4 hours. If ITS Required Action A.1 is not met, or two radiation monitor channels are inoperable, ITS Required Action B.1 and B.2 required that the affected penetrations be isolated or fuel movement involving recently irradiated fuel be suspended immediately. The CTS is revised to conform to the ITS. This changes the CTS by allowing a radiation monitoring channel to be inoperable for any reason up to 4 hours (ITS Action A.1) before the affected penetrations must be isolated or fuel movement involving recently irradiated fuel must be suspended (ITS Actions B.1 and B.2).	Action A.1	Action a	4
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	L.3	Unit 2 only. Unit 2 CTS Surveillance Requirement 4.9.9, in parts, states "The Containment Purge and Exhaust isolation system shall be demonstrated OPERABLE at least once per 7 days by verifying that containment Purge and Exhaust isolation occurs on manual initiation." ITS Table 3.3.6 specifies the Manual Initiation Function is required to be OPERABLE and SR 3.3.6.3 is required to be performed. ITS SR 3.3.6.3 states "Perform Trip Actuating Device Operational Test (TADOT) every 18 months. The TADOT is performed to ensure the manual initiation will perform the intended Function. A Note modifies the requirement. The Note states "Verification of setpoint is not required." This changes the CTS by decreasing the frequency of the required testing from 7 days to 18 months.	SR 3.3.6.3	4.9.9	7

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	L.4	Unit 2 only. CTS Table 4.3-3 specifies the surveillance requirements for the radiation monitor channels. CTS Table 4.3-3 specifies that a Channel Functional Test (CFT) be performed on a monthly frequency. The corresponding ITS surveillance requirement (ITS SR 3.3.6.2) states "Perform CHANNEL OPERATIONAL TEST (COT)," every 92 days. The difference between the CTS CFT and ITS COT is addressed in the markups and DOCs associated with the defined test terms in Section 1.0 of the TS. The CTS surveillance is revised to be consistent with the ITS. This changes the CTS by decreasing the frequency of the required testing from monthly to 92 days.	SR 3.3.6.2	Table 4.3-3	7
ITS 3.3.7 CTS 3.3.3.1	L.1	CTS LCO 3.3.3.1, Table 4.3-3 lists surveillance requirements for the control room area radiation monitors. The CTS specifies a Channel Functional Test (CFT) for this Function that must be performed each month. ITS LCO 3.3.7, Table 3.3.7-1 specifies the required surveillances for the CREVS actuation instrumentation. Table 3.3.7-1 specifies SR 3.3.7.2 for the control room area radiation monitors. SR 3.3.7.2 requires that a Channel Operational Test (COT) be performed every 92 days. The difference between the CTS CFT and ITS COT is addressed in the markups and DOCs associated with the defined test terms in Section 1.0 of the TS. The CTS surveillance is revised to be consistent with the ITS. This changes the CTS by decreasing the frequency of the required testing from monthly to 92 days.	SR 3.3.7.2	Table 4.3-3	7
ITS 3.3.7 CTS 3.3.3.1	L.2	Not used.			

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.7 CTS 3.3.3.1	L.3	Unit 1 only. Unit 1 CTS 3.3.3.1 Action 41.a.2 and b.2 address the plant condition where one of the two required radiation monitors are inoperable. The CTS Actions require suspension of all operations involving movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies within 1 hour. The corresponding ITS 3.3.7 Action Condition A allows 7 days before Action must be taken in this condition and does not require that fuel movement be suspended. Instead, the ITS Action requires that one Control Room Emergency Ventilation System (CREVS) be placed in the emergency pressurization mode of operation. The corresponding ITS Action Condition D is only applicable if ITS Action Condition A is not met and requires that fuel movement involving recently irradiated fuel be suspended immediately. The CTS Action is revised to conform to the ITS. This changes the CTS Actions by allowing up to 7 days for Action to be taken. In addition, the CTS Action is revised from suspension of fuel movement to place one CREVS train in the emergency pressurization mode. Only if the radiation monitor is not restored to operable status or the CREVS train is not placed in service within 7 days is fuel movement required to be suspended.	Action A & D	Action 41.a.2, b.2	3, 4
ITS 3.3.8 CTS 3.3.1.1	L.1	CTS Note 7 modifies the CTS Source Range Action (#5) and states: "Plant cooldown is allowable provided the temperature change is accounted for in the calculated shutdown margin." The ITS contains a similar note that modifies the required Actions of ITS 3.3.8 Action Condition A. The ITS Note states: "Plant temperature changes are allowed provided the temperature change is accounted for in the calculated SDM." The CTS Action is revised to conform to the ITS. This changes the effect of the CTS note by providing the additional allowance to increase temperature as well as the existing CTS allowance to cooldown.	Action A Note	Action 5 Note 7	4
ITS 3.3.8 CTS 3.3.1.1	L.2	CTS Table 4.3-1 Function 6.b specifies the performance of a CHANNEL FUNCTIONAL TEST (CFT) for the required Source Range Neutron Flux channel. The test must be performed on a quarterly basis and is modified by Note 8. The Note states "Below P-6, not required to be performed for source range instrumentation prior to entering MODE 3 from MODE 2 until 12 hours after entry into MODE 3." The corresponding ITS LCO 3.3.8 does not require the performance of a CFT (or Channel Operational Test (COT) in the ISTS) of the Source Range instrument channel required operable. The CTS surveillance requirements are revised to conform to the ITS. This changes the CTS by deleting the CTS CFT surveillance requirement.	NA	Table 4.3-1, 6.b, Note 8	5

Table L
Less Restrictive Changes
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.2 CTS 3.3.2.1	L.1	<p>CTS surveillance 4.3.2.1.3 specifies the response time testing requirements for the ESFAS Functions. The corresponding ISTS SR 3.3.2.10 contains a note that provides an allowance for verifying the response time of the turbine-driven AFW pump. The ISTS allowance provides a time delay applicable during plant startups and that is based on reaching the required steam pressure for operating the turbine pump. The CTS ESFAS response time surveillance is revised to incorporate the allowance provided by the ISTS note. The proposed change modifies the ISTS allowance consistent with the steam pressure provisions of a similar allowance that exists in CTS Section 3.7 for testing the turbine-driven AFW pump. This changes the CTS by providing a delay time for testing the AFW pump to allow for the necessary plant condition (steam pressure) to ensure proper turbine operation. In addition, the proposed change makes the ESFAS response time test requirement for the turbine-driven AFW pump consistent with the CTS test requirements for this pump in Section 3.7 of the CTS.</p>	SR 3.3.2.10	4.3.2.1.3	7
ITS 3.3.2 CTS 3.3.2.1	L.2	<p>The Unit 1 and 2 CTS ESFAS requirements for steamline isolation include the manual switches for the individual main steam isolation valves. The Unit 2 ESFAS requirements also include the system level steam line isolation manual initiation switches. The ISTS only requires a single manual initiation feature for steam line isolation. The CTS requirements are revised to be more consistent with the ISTS requirements and the BVPS Unit 1 and 2 ESFAS design. This changes the Unit 1 and 2 CTS by eliminating the individual main steam isolation valve control switches from the ESFAS Instrumentation TS. The proposed change includes the elimination of the LCO, Action, and Surveillance requirements associated with this instrumentation.</p>	NA	LCO, Action, SR	1, 4, 5
ITS 3.3.2 CTS 3.3.2.1	L.3	<p>CTS Table 3.3-3 Note (1) states that the "trip function may be bypassed in this MODE below P-11." The CTS Note is used to modify the Mode 3 Applicability for certain ESFAS Functions associated with the P-11 interlock. The corresponding ISTS Note (a) states; "Above the P-11 (Pressurizer Pressure) interlock. The ISTS Note is also used to modify the Mode 3 Applicability of ESFAS Functions associated with the P-11 interlock. The CTS is revised to conform to the ISTS. This changes the CTS by relaxing the Applicability such that the ESFAS Functions are only required operable in Mode 3 above the P-11 interlock.</p>	Table 3.3.2-1 Note (a)	Table 3.3-3 Note 1	2

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.2 CTS 3.3.2.1	L.4	Unit 2 only. The CTS Phase B containment isolation Function consists of an automatic isolation on containment pressure high-high. The applicable Modes for which the CTS containment pressure high-high Function is required operable are Modes 1-4. The corresponding ISTS phase B isolation on containment pressure High-High is required operable in Modes 1-3. The corresponding BVPS Unit 1 Function is also required operable in Modes 1-3. The Unit 2 BVPS phase B isolation on containment pressure is revised to conform to the ISTS and Unit 1 Applicable Modes. This changes the Unit 2 CTS by eliminating the requirement to maintain this ESFAS Function Operable in Mode 4.	Table 3.3.2-1, Containment Isolation Phase B Function	Table 3.3-3, Containment Isolation Phase B Function	2
ITS 3.3.2 CTS 3.3.2.1	L.5	The CTS ESFAS requirements specify that the steam line isolation actuation Functions be operable in Modes 1, 2, and 3. The corresponding ISTS requirements for the steam line isolation Functions contain an exception to the requirement for these Functions to be operable in Modes 2 and 3. The ISTS exception is in the form of a note (ITS Note b) that states "except when all MSIVs are closed and deactivated." The CTS steam line isolation Function requirements are revised to conform to the ISTS. This changes the CTS by providing an exception to the operability requirements for the steam line isolation Functions in Modes 2 and 3.	Table 3.3.2, Note (b)	Table 3.3-3, Steam Line Isolation Function	2
ITS 3.3.2 CTS 3.3.2.1	L.6	The CTS Turbine Trip and Feedwater Isolation ESFAS Functions are required operable in Modes 1, 2, and 3. The CTS does not provide any exceptions. The corresponding ISTS requirements contain exceptions to the Mode 2 and 3 operability requirements. The ISTS does not require the Turbine Trip and Feedwater Isolation Function to be operable if all the Feedwater lines are isolated. The CTS is revised to be more consistent with the ISTS. This changes the CTS by providing an exception to the operability requirements for this ESFAS Function in Modes 2 and 3.	Table 3.3.2-1, FW Isolation Function	Table 3.3-3, FW Isolation Function	2
ITS 3.3.2 CTS 3.3.2.1	L.7	The CTS requires the ESFAS AFW pump start on trip of all main feedwater pumps Function to be operable in Modes 1, 2, and 3. The corresponding ISTS AFW start Function is required operable in Modes 1 and 2. The CTS Applicability for this Function is revised to conform to the ISTS. This changes the CTS by eliminating the requirement for the automatic AFW pump start on trip of all main feedwater pumps to be operable in Mode 3.	Table 3.3.2-1, AFW Pump Start Function	Table 3.3-3, AFW Pump Start Function	2

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.2 CTS 3.3.2.1	L.8	The CTS contains an Action (#36) for inoperable SI Automatic Actuation Logic that states "The block of the automatic actuation logic introduced by a reset of safety injection shall be removed by resetting (closure) of the reactor trip breakers within one hour of an inadvertent initiation of safety injection providing that all trip input signals have reset due to stable plant conditions. Otherwise, the requirements of ACTION Statement 13 shall have been met." The ISTS does not contain a corresponding Action requirement. The CTS is revised to conform more closely to the ISTS. This changes the CTS by eliminating a separate Completion Time and Action for the described condition.	NA	Action 36	3, 4
ITS 3.3.2 CTS 3.3.2.1	L.9	CTS Action #18 and #13 are applicable for several ESFAS Functions. Both these Actions contain shutdown requirements that ultimately place the plant in Cold Shutdown (Mode 5). The corresponding ITS Actions Conditions are B, F, and I for CTS Action #18 and ITS Conditions C and G for CTS Action #13. ITS Action Conditions B and C are similar to CTS Action #18 and #13 in that they also specify a plant shutdown to Mode 5. However, ITS Action Conditions F and G only require a plant shutdown to Mode 4 and ITS Condition I only requires a shutdown to Mode 3. CTS Actions 18 and 13 are revised to conform to the corresponding ISTS Action Conditions. This changes the CTS by dividing Action 18 and 13 into separate ITS Action Conditions and reducing the shutdown requirement in some of those Conditions to Mode 4 or Mode 3 instead of Mode 5.	Actions B, C, F, G, I	Action 18 & 13	4
ITS 3.3.2 CTS 3.3.2.1	L.10	(Unit 2 only) CTS Action statement 42 applies the Turbine Trip and Feedwater Isolation and AFW Automatic Actuation Logic Functions and requires that with an inoperable channel the plant be placed in Hot Standby (Mode 3) in 6 hours and in Hot Shutdown (Mode 4) within the following 6 hours. The corresponding ISTS Action (Condition G) adds a requirement to restore the train to operable status in 6 hours prior to the requirement to be in Mode 3 and Mode 4. In addition, the ISTS provides 12 hours to be in Mode 3 instead of the 6 hours required in the CTS. The CTS is revised to conform to the ISTS. This changes the CTS by allowing an additional 6 hours to restore the affected train to operable status prior to requiring the plant be placed in Mode 3.	Action G	Action 42	3

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.2 CTS 3.3.2.1	L.11	The CTS Applicable Mode requirements on Table 4.3-2 for ESFAS Functions 1.d and 1.e (Pressurizer Pressure - Low and Steam Line Pressure - Low) is given as Modes 1, 2, and 3. However, in CTS Table 3.3.3, the Mode 3 Applicability for these Functions is modified by a Note indicating the Function is not required below the P-11 setpoint. The corresponding ISTS requirement for these Functions on Table 3.3.2-1 also is modified by a Note indicating the Functions are only required operable above the P-11 setpoint. The requirements for these Functions on CTS Table 4.3-2 are revised to be consistent with the CTS requirements for these Functions in Table 3.3.3 and to conform to the requirements for these Functions in ISTS Table 3.3.2-1. This changes the CTS Table 4.3-2 surveillance requirements for these Functions by eliminating the need to perform the surveillance on these Functions in Mode 3 below the P-11 setpoint.	Table 3.3.2-1, P-11 Note	Table 4.3-2, Functions 1.d & 1.e	2
ITS 3.3.2 CTS 3.3.2.1	L.12	The Applicability requirements specified on CTS Table 4.3-2 for Functions 4.d and 4.e (Steam Line Pressure-Low and Steam Line Pressure Rate - High Negative) require that the surveillances be met in Modes 1-3. However, in CTS Table 3.3.3, the Mode 3 Applicability for these Functions is modified by Notes indicating that the Steam Line Pressure - Low Function only required above the P-11 setpoint and the Steam Line Pressure Rate - High Negative Function is only required below the P-11 setpoint when SI on low steam line pressure is blocked. The ISTS also has notes that similarly modify the Mode 3 applicability of these ESFAS Functions. The applicability specified in CTS Table 4.3-2 for these two Functions is revised to be more consistent with the applicability specified in CTS Table 3.3-3 and ISTS Table 3.3.2-1. This changes the surveillance applicability specified in Table 4.3-2 such that the Mode 3 applicability for these two Functions is limited in Mode 3 to above and below P-11 and the Modes 1-2 applicability for the Steam Line Pressure Rate - High Negative Function is eliminated.	Table 3.3.2-1, P-11 Notes	Table 4.3-2, Functions 4.d & 4.e	2
ITS 3.3.2 CTS 3.3.2.1	L.13	Unit 1 only. The Unit 1 CTS Table 3.3-3 and 4.3-2 specify requirements for the manual initiation of the SI transfer from injection to re-circulation mode of operation. The corresponding Unit 2 and ISTS ESFAS TS do not contain requirements for the manual initiation of this ESFAS Function. The Unit 1 ESFAS TS is revised to conform to the corresponding requirements in the Unit 2 TS and ISTS. This changes the Unit 1 CTS by eliminating the TS requirements from CTS Tables 3.3-3 and 4.3-2 that address the manual initiation of the SI transfer from injection to re-circulation mode of operation.	NA	Table 3.3-3 & Table 4.3-2, Manual Actuation of SI Recirc Transfer Function	1, 5

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.3.2 CTS 3.3.2.1	L.14	The CTS surveillances for the RCP bus voltage Function specified in Table 4.3-2 requires a quarterly Channel Functional Test (CFT). The corresponding ITS surveillance requirement for this ESFAS Function (SR 3.3.2.5) specifies a quarterly Trip Actuating Device Operational Test (TADOT). The ISTS TADOT requirement is modified by a note that specifies that verification of relay setpoints is not required. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by adding a specific exception for setpoint verification when performing the quarterly functional test.	SR 3.3.2.5	Table 4.3-2, RCP Bus Voltage Function	6
ITS 3.3.2 CTS 3.3.2.1	L.15	The CTS surveillance requirements for the RCP bus undervoltage start of the AFW pumps include a channel check. The corresponding ISTS surveillance requirements for this ESFAS Function do not include a channel check. The CTS is revised to conform to the ISTS. This change results in the deletion of the CTS channel check surveillance for this function.	NA	Table 4.3-2, RCP Bus undervoltage AFW start Function Channel Check	5
ITS 3.3.2 CTS 3.3.2.1	L.16	CTS surveillance 4.3.2.1.2 specifies in part that "The total interlock function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by interlock operation." The corresponding ISTS surveillances require an 18-month channel calibration of interlock channels and an actuation logic test every 31-days on a staggered test basis. The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by eliminating the 18-month surveillance requirement to verify the total interlock function at least every 18 months during the channel calibration.	NA	4.3.2.1.2	5
ITS 3.3.2 CTS 3.3.2.1	L.17	Unit 1 only. The Unit 1 CTS specifies Action 38 for the P-4 interlock. Action 38 requires that the interlock be verified in its required state within 1 hour or Specification 3.0.3 must be applied. Note that Unit 1 Action 38 is the same as Unit 2 Action 38. The corresponding ISTS Action requirement (Condition F) specifies that with one inoperable channel or train the inoperable channel or train be restored to operable status within 48 hours or that the plant be placed in Mode 4 in 60 hours. In Mode 4, the P-4 interlock Function is no longer required operable. The corresponding Unit 2 CTS Action (#45) for the P-4 Function also specifies that the inoperable channel be restored to operable status within 48 hours or the plant be placed in a Mode 4 in 60 hours. The Unit 1 Action for the P-4 interlock Function is revised to conform to the corresponding ISTS (and Unit 2) Action requirements. This changes the Unit 1 Action by allowing 48 hours to restore the interlock to operable status and up to 60 hours to be in Mode 4 if the interlock is not restored to operable status instead of requiring the interlock to be verified in its required state within 1 hour or apply the actions of Specification 3.0.3.	Action F	Action 38	3

Table L
Less Restrictive Changes
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.1.4 CTS 3.2.5	L.1	The CTS action statement for DNB parameters not within limits requires that the parameter be restored to within the limit within 2 hours or that power be reduced to less than 5% RTP within the following 4 hours. The corresponding ISTS Actions also allow 2 hours to restore the affected parameter(s) to within the limit but the ISTS provides 6 hours to reach Mode 2 ($\leq 5\%$ power) if the parameter(s) are not restored to within the limit. The CTS Action time is revised to be consistent with the ISTS. This changes the CTS by allowing more time to reach Mode 2.	Action	Action	3
ITS 3.4.2 CTS 3.1.1.5	L.1	CTS Surveillance 4.1.1.5 states that the RCS T_{avg} shall be determined to be ≥ 541 °F within 15 minutes prior to achieving reactor criticality and every 30 minutes when the RCS $T_{avg} < 551$ °F and the T_{avg} deviation alarm not reset. The corresponding ISTS SR 3.4.2.1 requires RCS T_{avg} in each loop to be verified to be ≥ 541 °F every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS Surveillance Frequency by requiring that the RCS T_{avg} for each loop be verified every 12 hours which would include one verification within 12 hours prior to achieving criticality.	SR 3.4.2.1	4.1.1.5	7
ITS 3.4.4 CTS 3.4.1.1		NONE			
ITS 3.4.5 CTS 3.4.1.2	L.1	CTS Action Statement b provides the requirements for less than two RCS loops in operation and specifies immediate Actions be taken. The Corresponding ISTS Action is limited to one required RCS loop not in operation and provides 1 hour for completion of the Actions. The CTS is revised to conform to the ISTS Action. This changes the CTS by limiting the Action Condition to a single RCS loop not in operation and allowing up to 1 hour for completion of the required Actions.	Action C	Action b	3

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.5 CTS 3.4.1.2	L.2	CTS 3.4.1.2, Action c, states that when no reactor coolant loops are in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. ISTS 3.4.5, Action D states that if two required RCS loops are inoperable or the required RCS loop(s) are not in operation, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended. The CTS action is revised to conform to the ISTS. This changes the CTS Actions by revising the Action from suspending reductions in boron concentration to suspending the introduction of coolant with a boron concentration less than required to meet LCO 3.1.1.	Action D	Action c	4
ITS 3.4.5 CTS 3.4.1.2	L.3	CTS surveillance 4.4.1.2.2 specifies that the RCS loops not in operation be verified operable once per 7 days by verifying correct breaker alignments and indicated power availability. The proposed ITS surveillance SR 3.4.5.3, although simplified when compared to the CTS surveillance, requires the same verifications every 7 days but includes a note that states the surveillance is " Not required to be performed until 24 hours after a required pump is not in operation." The CTS is revised to conform to the proposed ITS surveillance SR 3.4.5.3. This changes the CTS by allowing credit to be taken for recent pump operation to meet the surveillance such that the surveillance is not required to be performed until 24 hours after the pump is removed from operation.	SR 3.4.5.3	4.4.1.2.2	7
ITS 3.4.6 CTS 3.4.1.3	L.1	CTS 3.4.1.3, Action a, states that with less than the two required coolant loops OPERABLE, action must be immediately initiated to return the required loops to OPERABLE status as soon as possible and to be in COLD SHUTDOWN within 20 hours. The corresponding ISTS 3.4.6, Action A, states that when one required loop is inoperable, action must be initiated immediately to restore the required loop to OPERABLE status. Action A also requires the plant to be in MODE 5 within 24 hours, but only if an RHR loop is OPERABLE. The CTS is revised to conform to the ISTS. This changes the CTS by providing an exception to the requirement to be in MODE 5 and allowing 24 hours instead of 20 hours to reach MODE 5.	Action A	Action a	4

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.6 CTS 3.4.1.3	L.2	This DOC is applicable to CTS 3.4.1.3 Action b. CTS 3.4.1.2, Action b, requires that when no coolant loop is in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. The corresponding ISTS 3.4.6, Condition B requires that if two required loops are inoperable or the required loop(s) are not in operation, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended. The CTS Action is revised to conform to the ISTS. This relaxes the CTS by revising the requirement to suspend reductions in boron concentration to suspend the introduction of coolant with a boron concentration less than required to meet LCO 3.1.1.	Action B	Action b	4
ITS 3.4.6 CTS 3.4.1.3	L.3	CTS Surveillance 4.4.1.3.1 specifies that the required RHR loops be determined operable in accordance with Specification 4.0.5. The corresponding ISTS does not contain this Surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating CTS surveillance 4.4.1.3.1.	NA	4.4.1.3.1	5
ITS 3.4.6 CTS 3.4.1.3	L.4	CTS surveillance 4.4.1.3.2 specifies that the RCS loops not in operation be verified operable once per 7 days by verifying correct breaker alignments and indicated power availability. The proposed ITS surveillance SR 3.4.6.3, although simplified when compared to the CTS surveillance, requires the same verifications every 7 days but includes a note that states the surveillance is " Not required to be performed until 24 hours after a required pump is not in operation." The CTS is revised to conform to the proposed ITS surveillance SR 3.4.6.3. This changes the CTS by allowing credit to be taken for recent pump operation to meet the surveillance such that the surveillance is not required to be performed until 24 hours after the pump is removed from operation.	SR 3.4.6.3	4.4.1.3.2	7
ITS 3.4.7 CTS 3.4.1.3	L.1	CTS 3.4.1.3 requires that two coolant loops be operable and that an RCS loop used to satisfy the LCO requirement must consist of its associated steam generator, and RCP. The corresponding ISTS 3.4.7 LCO requirement (for Mode 5 with RCS loops filled) specifies that a steam generator with a secondary side water level of 28% for Unit 1 and 15.5% for Unit 2 may be used to satisfy the LCO requirement for one of the two required coolant loops. The CTS LCO requirement is revised to conform to the ISTS. This changes the CTS by eliminating the requirement that an RCS loop used to meet the LCO must have an OPERABLE RCP.	LCO	LCO	1

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.7 CTS 3.4.1.3	L.2	This DOC is applicable to CTS 3.4.1.3 Action b. CTS 3.4.1.2, Action b, requires that when no coolant loop is in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. The corresponding ISTS 3.4.7, Condition C requires that if no required loops are operable or the required RHR loop is not in operation, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended. The CTS Action is revised to conform to the ISTS. This relaxes the CTS by revising the requirement to suspend reductions in boron concentration to suspend the introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 (SDM).	Action C	Action b	4
ITS 3.4.7 CTS 3.4.1.3	L.3	Not used.			
ITS 3.4.7 CTS 3.4.1.3	L.4	CTS Surveillance 4.4.1.3.1 specifies that the required RHR loops be determined operable in accordance with Specification 4.0.5. The corresponding ISTS 3.4.7 does not contain this Surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating CTS surveillance 4.4.1.3.1.	NA	4.4.1.3.1	5
ITS 3.4.7 CTS 3.4.1.3	L.5	CTS surveillance 4.4.1.3.2 specifies that the RCS loops not in operation be verified operable once per 7 days by verifying correct breaker alignments and indicated power availability. The proposed ITS surveillance SR 3.4.7.3, although simplified when compared to the CTS surveillance, requires the same verifications every 7 days but includes a note that states the surveillance is " Not required to be performed until 24 hours after a required pump is not in operation." The CTS is revised to conform to the proposed ITS surveillance SR 3.4.7.3. This changes the CTS by allowing credit to be taken for recent pump operation to meet the surveillance such that the surveillance is not required to be performed until 24 hours after the pump is removed from operation.	SR 3.4.7.3	4.4.1.3.2	7

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.8 CTS 3.4.1.3	L.1	This DOC is applicable to CTS 3.4.1.3 Action b. CTS 3.4.1.2, Action b, requires that when no coolant loop is in operation, all operations involving a reduction in boron concentration of the RCS must be suspended. The corresponding ISTS 3.4.8, Condition B requires that if no required loops are operable or the required RHR loop is not in operation, operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1 must be suspended. The CTS Action is revised to conform to the ISTS. This relaxes the CTS by revising the requirement to suspend reductions in boron concentration to suspend the introduction of coolant with a boron concentration less than required to meet LCO 3.1.1 (SDM).	Action B	Action b	4
ITS 3.4.8 CTS 3.4.1.3	L.2	Not used.			
ITS 3.4.8 CTS 3.4.1.3	L.3	CTS Surveillance 4.4.1.3.1 specifies that the required RHR loops be determined operable in accordance with Specification 4.0.5. The corresponding ISTS 3.4.8 does not contain this Surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating CTS surveillance 4.4.1.3.1.	NA	4.4.1.3.1	5
ITS 3.4.8 CTS 3.4.1.3	L.4	CTS surveillance 4.4.1.3.2 specifies that the RCS loops not in operation be verified operable once per 7 days by verifying correct breaker alignments and indicated power availability. The proposed ITS surveillance SR 3.4.8.2, although simplified when compared to the CTS surveillance, requires the same verifications every 7 days but includes a note that states the surveillance is " Not required to be performed until 24 hours after a required pump is not in operation." The CTS is revised to conform to the proposed ITS surveillance SR 3.4.8.2. This changes the CTS by allowing credit to be taken for recent pump operation to meet the surveillance such that the surveillance is not required to be performed until 24 hours after the pump is removed from operation.	SR 3.4.8.2	4.4.1.3.2	7
ITS 3.4.17 CTS 3.4.1.4.1		NONE			

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.18 CTS 3.4.1.5	L.1	The CTS 3.4.1.5 LCO requirement specifies that an isolated loop be drained and refilled. In addition, the CTS Surveillance requirements 4.4.1.5.1 and 4.4.1.5.3 provide verification that the affected RCS loop has been drained and filled and unisolated within the required time after refill. The corresponding ISTS 3.4.18 LCO requirements do not contain requirements to drain and refill the affected RCS loop. The corresponding ISTS LCO and surveillances require that the boron concentration of the isolated loop be verified within the required limits for Mode 5 or 6 and that the cold leg temperature of the isolated loop be verified $\leq [20]^{\circ}\text{F}$ below the highest cold leg temperature of the operating loops. The CTS surveillances are revised to be more consistent with the ISTS requirements. This changes the CTS by eliminating the LCO requirement to drain and refill an isolated loop and the surveillance requirements related to the drain and refill of an isolated loop.	LCO	LCO, 4.4.1.5.1 & 4.4.1.5.3	1, 5
ITS 3.4.10 CTS 3.4.3	L.1	CTS LCO 3.4.3 provides requirements for the pressurizer code safety valves in Modes 1, 2, 3, and 4. The corresponding ISTS LCO 3.4.10 Applicability is modified by a Note which allows the lift settings to not be within the LCO limits during MODES 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions. The exception is allowed for 54 hours following entry into Mode 3 provided a preliminary cold setting was made prior to heatup. The CTS is revised to incorporate the ISTS note. This changes the CTS by allowing entry into Modes 3 and 4 without verifying that the pressurizer code safety valve lift settings are within the LCO limits.	Applicability Note	Applicability	2
ITS 3.4.10 CTS 3.4.3	L.2	CTS 3.4.3 states that with one pressurizer code safety valve inoperable, be in Mode 4 with any RCS cold leg temperature \leq the enable temperature specified in the PTLR within 12 hours. The corresponding ISTS 3.4.10 allows up to 24 hours to be in the same condition. The CTS is revised to be consistent with the ISTS. This changes the CTS by allowing 24 hours vice 12 hours to reach the end condition.	Action	Action	3

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.9 CTS 3.4.4	L.1	The CTS 3.4.4 Actions for less than the required pressurizer heater capacity on one emergency bus requires that the plant be placed in Mode 3 in 6 hours and Mode 4 in the following 12 hours. The CTS Action does not allow any time to restore heater capacity before requiring the plant to be removed from the applicable Modes of TS 3.4.4. The Corresponding ISTS Action (Condition B) allows 72 hours to restore heater capacity to within the required limits before requiring the plant be removed from the applicable Modes. The CTS is revised to conform to the ISTS. This changes the CTS by including a 72-hour allowance to restore the pressurizer heater capacity to within the required 150kW per emergency bus.	Action B	Actions	4
ITS 3.4.9 CTS 3.4.4	L.2	The CTS 3.4.4 Actions applicable when the requirement for a pressurizer bubble is not met specify that the plant be in HOT STANDBY with the reactor trip breakers open within 6 hours. The corresponding ISTS 3.4.9 Action (Condition A) also requires that the plant be in MODE 3 within 6 hours for this Condition, but requires that the rods be fully inserted and the Rod Control System be in a condition incapable of rod withdrawal. The CTS is revised to conform to the ISTS. This changes the CTS by not specifically requiring that the RTBs be open.	Action A	Actions	4
ITS 3.4.9 CTS 3.4.4	L.3	CTS surveillance 4.4.4.1 specifies that "the power supply for the pressurizer heaters shall be demonstrated OPERABLE at least once per 18 months by energizing the heaters supplied by the emergency bus." The CTS surveillance verifies that the heaters are energized from the emergency bus and that the required heater capacity is available. The corresponding ISTS surveillance verifies that the required pressurizer heater capacity is available (SR 3.4.9.2). The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the specific requirement to verify the heaters are energized.	SR 3.4.9.2	4.4.4.1	6
ITS 3.4.13 CTS 3.4.5		NONE			

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.15 CTS 3.4.6.1	L.1	The CTS 3.4.6.1 Actions do not include an exclusion allowing a delay in performing an RCS water inventory balance until 12 hours after steady state conditions are established. The corresponding ISTS 3.4.15 Actions include NOTES that state, "Not required until 12 hours after establishment of steady state operation." The CTS is revised to conform to the ISTS. This changes the CTS by allowing 12 hours after establishment of steady state operation before the required action to perform an RCS water inventory balance must be initiated.	Actions	Actions	4
ITS 3.4.15 CTS 3.4.6.1	L.2	CTS 3.4.6.1 Action c is applicable when all the required RCS leak detection instrumentation is inoperable and specifies that the plant "be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. The CTS allows up to a total of 36 hours to be in Mode 5. The corresponding ISTS Action requires that LCO 3.0.3 be entered immediately. LCO 3.0.3 allows 1 hour to prepare for a plant shutdown before requiring that the actual shutdown begin. LCO 3.0.3 would allow up to 37 hours to be in Mode 5. The CTS is revised to conform to the ISTS. This changes the CTS Action by allowing an additional hour before commencing a plant shutdown.	Actions	Action c	3
ITS 3.4.15 CTS 3.4.6.1	L.3	CTS 3.3.3.1 Table 4.3-3 requires a monthly Channel Functional Test for the RCS leakage detection radiation monitors. The corresponding ISTS SR 3.4.15.2 requires a Channel Operational Test (equivalent to the CTS Channel Functional Test) be performed every 92 days. The CTS is revised to conform to the ISTS. This changes the CTS by increasing the Frequency for the surveillance from monthly to 92 days.	SR 3.4.15.2	Table 4.3-3	7
ITS 3.4.13 CTS 3.4.6.2	L.1	CTS Surveillances 4.4.6.2.a.1 through a.4 require monitoring the containment atmosphere particulate and gaseous radioactivity monitors and the containment sump level and discharge every 12 hours. The corresponding ISTS requirements in 3.4.13 do not contain requirements to monitor these indications. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating CTS surveillance 4.4.6.2.a.	NA	4.4.6.2.a.	5

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.13 CTS 3.4.6.2	L.2	CTS surveillance 4.4.6.2.b requires a "Performance of a Reactor Coolant System water inventory balance at least once per 72 hours during steady state operation." The CTS surveillance is modified by Note 2 which allows 12 hours of steady state operation before the surveillance must be performed in Mode 3 or 4. The corresponding ITS surveillance (SR 3.4.13.1) is modified by a Note that does not restrict the 12 hour allowance for steady state operation prior to performing the surveillance to Mode 3 and 4. The CTS is revised to conform to the ITS. This changes the CTS by providing a 12 hour exception for steady state operation prior to performing the surveillance in Modes 1 and 2 as well as Modes 3 and 4.	SR 3.4.13.1	4.4.6.2.b	7
ITS 3.4.14 CTS 3.4.6.3	L.1	CTS 3.4.6.3, Pressure Isolation Valves, (PIVs) is applicable in MODES 1, 2, 3, and 4. The corresponding ISTS 3.4.14 is applicable in MODES 1, 2, and 3, and MODE 4, except valves in the residual heat removal (RHR) flow path when in, or during the transition to or from, the RHR mode of operation. SR 3.4.14.1, Note 2, also exempts RHR PIVs from the leakage surveillance when in the shutdown cooling mode of operation. The CTS Applicability is revised to conform to the ISTS. This changes CTS by exempting the RHR isolation PIVs from the leakage requirements when those valves are open and the RHR system is being used for shutdown decay heat removal.	Applicability & SR 3.4.14.1, Note 2	Applicability	2
ITS 3.4.14 CTS 3.4.6.3	L.2	CTS 3.4.6.3 Action 1 requires that the low pressure system be isolated by use of a closed manual or deactivated automatic valve. The corresponding ISTS Action A.1 allows the use of a check valve to perform the isolation function in addition to a closed manual or deactivated automatic valve. The CTS is revised to conform to the ISTS. This changes the CTS by allowing the use of a check valve to meet the isolation Action.	Action A.1	Action 1	4
ITS 3.4.14 CTS 3.4.6.3	L.3	CTS Surveillance 4.4.6.3.1 requires testing of RCS PIVs prior to returning the valve to service after each maintenance, repair, or replacement work is performed. The corresponding ISTS SR 3.4.14.1 does not include this requirement. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating a post-maintenance Surveillance Requirement.	SR 3.4.14.1	4.4.6.3.1	5

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.14 CTS 3.4.6.3	L.4	CTS Surveillance 4.4.6.3.2 requires testing of RCS PIVs prior to entering MODE 2 after each time the plant is placed in Cold Shutdown for 72 hours if leakage testing has not been performed in the previous 9 months. The corresponding ISTS SR 3.4.14.1 frequency requires verifying the RCS PIV leakage prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months. The CTS is revised to conform to the ISTS. This changes the CTS by allowing shutdowns to MODE 5 for up to 7 days in length without requiring RCS PIV testing instead of the 3 days allowed in Mode 5 by the CTS.	SR 3.4.14.1	4.4.6.3.2	7
ITS 3.4.16 CTS 3.4.8	L.1	CTS 3.4.8 is applicable in MODES 1, 2, 3, 4, and 5. ITS 3.4.16 is applicable in MODES 1 and 2, and MODE 3 with $T_{avg} \geq 500$ °F. This changes the CTS by reducing the MODES in which the LCO and surveillances are applicable.	Applicability	Applicability	2
ITS 3.4.16 CTS 3.4.8	L.2	Not used.			
ITS 3.4.16 CTS 3.4.8	L.3	CTS Table 4.4-12, Item 1, requires gross activity determination at least 3 times per 7 days. The corresponding ISTS SR 3.4.16.1 requires verification that the reactor coolant gross specific activity $\leq 100 / \bar{E}$ $\mu\text{Ci/gm}$ every 7 days. This changes the CTS by reducing the Frequency from 3 times per 7 days to once per 7 days.	SR 3.4.16.1	Table 4.4-12, Item 1	7
ITS 3.4.16 CTS 3.4.8	L.4	CTS Action a and Table 4.4-12, Item 4, require isotopic analysis for iodine once per 4 hours when the specific activity exceeds $100 / \bar{E}$ $\mu\text{Ci/gm}$. The corresponding ISTS Action Condition A does not contain this requirement. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the requirement to verify Dose Equivalent I-131 every 4 hours when gross activity exceeds $100 / \bar{E}$ $\mu\text{Ci/gm}$.	Action A	Action a, Table 4.4-12, Item 4	4
ITS 3.4.16 CTS 3.4.8	L.5	CTS Table 4.4-12 item 4.b) specifies that an isotopic Analysis for iodine be performed between 2 and 6 hours following a power change exceeding 15% within 1 hour. The CTS specifies this surveillance as applicable in Mode 1, 2, and 3. The corresponding ISTS surveillance, SR 3.4.16.2, is only required to be performed in Mode 1. The CTS is revised to conform to the ISTS. This changes the CTS applicability by eliminating the requirement to perform this surveillance in Modes 2 and 3.	SR 3.4.16.2	Table 4.4-12 item 4.b)	2

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.3 CTS 3.4.9.1	L.1	CTS surveillance 4.4.9.1.b specifies that "the Reactor Coolant System temperature and pressure conditions shall be determined to be to the right of the criticality limit line specified in the PTLR within 15 minutes prior to achieving reactor criticality." ISTS 3.4.3 does not contain a corresponding requirement. The CTS is revised to conform to the ISTS. This changes the CTS by deleting CTS surveillance 4.4.9.1.b.	NA	4.4.9.1.b	5
ITS 3.4.3 CTS 3.4.9.1	L.2	CTS surveillance 4.4.9.1.c specifies that "the reactor vessel material irradiation surveillance specimens shall be removed and examined in accordance with 10 CFR 50, Appendix H, to determine changes in material properties. The results of these examinations shall be used to update the PTLR." ISTS 3.4.3 does not contain a corresponding requirement. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance requirement 4.4.9.1.c.	NA	4.4.9.1.c	5
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	L.1	CTS 3.4.9.3 Action a states " with two or more charging pumps capable of injecting into the RCS, immediately initiate action to verify a maximum of one charging pump is capable of injecting into the RCS or depressurize and vent the RCS through a 3.14 square inch or larger vent within 12 hours." The corresponding Action Condition A in the proposed BVPS ITS 3.4.12 only requires that action be initiated immediately to verify a maximum of one charging pump is capable of injecting into the RCS. This changes the CTS by eliminating the alternate Action requirement to depressurize and vent the RCS.	Action A	Action a	4
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	L.2	CTS surveillance 4.4.9.3.2.b requires that a Channel Functional Test be performed on the PORVs "within 31 days prior to entering a condition in which the PORV is required to be OPERABLE and placed in operation after decreasing the RCS cold leg temperature to less than or equal to the enable temperature specified in the PTLR." The corresponding ITS surveillance SR 3.4.12.6 allows the surveillance to be performed up to 12 hours after decreasing RCS cold leg temperature to less than or equal to the enable temperature specified in the PTLR. The CTS is revised to conform to the ISTS. This changes the CTS by allowing the PORV calibrations to be completed after the RCS temperature is decreased below the PORV enable temperature instead of requiring the calibrations to be completed prior to the RCS reaching the enable temperature.	SR 3.4.12.6	4.4.9.3.2.b	7

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4.1.2	L.3	CTS 4.4.9.3.3 is applicable when the RCS vent is required. The CTS surveillance requires that an open vent (i.e., removed pressurizer safety valve) or unlocked open vent valve be verified every 12 hours. The corresponding ISTS surveillance SR 3.4.12.5 allows 31 days for the verification of an open vent such as a removed pressurizer safety valve. The CTS is revised to be consistent with the ISTS. This changes the CTS by extending the surveillance interval for an open vent from every 12 hours to every 31 days.	SR 3.4.12.5	4.4.9.3.3	7
ITS 3.4.11 CTS 3.4.11	L.1	Not used.			
ITS 3.4.11 CTS 3.4.11	L.2	CTS Actions d and e address inoperable block valves. The corresponding ISTS Action Conditions C and F contain Notes that provide an exception to the associated Actions for inoperable block valves when the block valve is inoperable solely as a result of complying with Required Actions to remove the power. The CTS Actions are revised to conform to the ISTS. This changes the CTS by providing an exception to the Actions associated with inoperable block valves when the block valves are inoperable solely as a result of complying with Required Actions to remove the power.	Actions C & F	Actions d & e	4
ITS 3.4.11 CTS 3.4.11	L.3	CTS surveillance 4.4.11.2 requires that each PORV block valve be operated through one complete cycle of full travel once per 92 days unless the block valve is closed to meet required Actions b or c. The corresponding ISTS surveillance SR 3.4.11.1 specifies a similar 92 day requirement to cycle the valve except that the surveillance is not required if the block valve is closed to meet any required Action of the LCO. The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by expanding the CTS allowance to not perform the surveillance if the valve is closed to meet Actions b or c to not require the surveillance to be performed if the valve is closed to meet any required Action of the LCO.	SR 3.4.11.1	4.4.11.2	7

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	L.1	<i>Applies to Unit 2 only.</i> Unit 2 CTS 3.10.4 provides an exception to the TS requirements for RCS Loops to be in operation in Mode 3. The purpose of the Unit 2 CTS test exception is to allow the performance of hot rod drop time measurements in Mode 3. The ISTS does not contain a test exception that corresponds to CTS 3.4.10. ISTS 3.4.19, RCS Loops - Test Exceptions, provides an exception to the TS requirements for RCS loops to be in operation in Modes 1 and 2 with thermal power less than P-7. The purpose of the ISTS test exception is to permit reactor criticality under no flow conditions during certain startup or physics tests such as a natural circulation demonstration. The CTS is revised to conform to the ISTS. This changes the CTS by replacing the CTS 3.10.4 Test Exception with the ISTS Test Exception 3.4.19.	3.4.19	3.4.10	1
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	L.2	<i>Applies to Unit 1 only.</i> Unit 1 CTS surveillance 4.10.5.2 requires that a channel functional test be performed on the power and intermediate range and P-7 instrumentation 12 hours prior to initiation of startup or PHYSICS TESTS. The corresponding ISTS surveillance specifies that a COT (channel operational test) be performed on the same instrumentation prior to initiation of startup or PHYSICS TESTS. The CTS surveillance frequency is revised to conform to the ISTS surveillance Frequency. This changes the CTS by eliminating the requirement to perform the surveillance 12 hours prior to the initiation of testing.	SR 3.4.19.2	4.10.5.2	7
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4	L.3	<i>Applies to Unit 1 only.</i> Unit 1 CTS surveillance 4.10.5.2 requires that a Channel Functional Test be performed on each power range channel. The corresponding ISTS surveillance requirement SR 3.4.19.2 specifies that the surveillance be performed on each power range neutron flux low trip Function channel. The CTS is revised to conform to the ISTS. This changes the CTS by limiting the surveillance to the power range neutron flux low trip function which clarifies that the surveillance is not applicable to the power range high trip function.	SR 3.4.19.2	4.10.5.2	6

* Change Categories:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation of Surveillance Requirement Acceptance Criteria
- 7 - Relaxation of Surveillance Frequency

Table L
Less Restrictive Changes
Section 3.4 - Reactor Coolant System

8 - Deletion of Reporting Requirement

Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.5.1 CTS 3.5.1	L.1	Unit 2 only. CTS 4.5.1.c for Unit 2 requires the verification that power is removed from each accumulator isolation valve operator control circuit at least every 31 days whenever RCS pressure is > 1000 psig. ITS SR 3.5.1.5 contains the same requirements, but is only necessary whenever RCS pressure is \geq 2000 psig. This changes the Unit 2 CTS by only requiring verification of power removal above 2000 psig and thus, relaxing the surveillance frequency. The Unit 1 CTS currently reflects a requirement of > 2000 psig.	SR 3.5.1.5	4.5.1.c	7
ITS 3.5.2 CTS 3.5.2	L.1	CTS 3.5.2 Action a states that when one train is inoperable, it must be returned to OPERABLE status within 72 hours. IST 3.5.2 Action A states, when one or more trains are inoperable, restore the trains to OPERABLE status within 72 hours. ITS 3.5.2 ACTION C states that with less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, enter LCO 3.0.3 immediately. This changes the CTS by allowing combinations of equipment in each train to be credited with meeting the ECCS safety function provided 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available.	Actions	Actions	4
ITS 3.5.2 CTS 3.5.2	L.2	CTS 3.5.2 Action b requires that a Special Report be prepared and submitted to the NRC within 30 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to describe the circumstances of the actuation and the total accumulated actuation cycles to date. ITS 3.5.2 does not include this requirement. This changes the CTS by deleting this reporting requirement.	NA	Action b	8
ITS 3.5.2 CTS 3.5.2	L.3	CTS LCO 3.5.2 states that two ECCS systems shall be Operable. ITS 3.5.2 states that two ECCS trains shall be Operable and provides an LCO Note that allows, in MODE 3, both low head safety injection pump flow paths to be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1. This changes the CTS by adding an exception in MODE 3 allowing the low head safety injection pump flow paths to be blocked for a limited time (2 hours) to accomplish RCS pressure isolation valve (PIV) testing at elevated RCS pressure conditions.	LCO Note	LCO	1

Table L
Less Restrictive Changes
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.5.2 CTS 3.5.2	L.4	Unit 1 only. The Surveillance Frequency of Unit 1 CTS 4.5.2.f states that the surveillance shall be performed "At least once per 18 months, during shutdown...." The corresponding ITS surveillance requirements (SR 3.5.2.5 and SR 3.5.2.6) do not specify that the surveillance must be performed "during shutdown". The CTS is revised to conform to the ITS. This changes the CTS by removing the requirement that the surveillance must be performed during shutdown.	SR 3.5.2.5 & SR 3.5.2.6	4.5.2.f	7
ITS 3.5.2 CTS 3.5.2	L.5	Unit 2 only. Unit 2 CTS 4.5.2.a.2 requires periodic verification that 2CHS*MOV373, the HHSI pump minimum flow valve, is open. Unit 2 CTS 4.5.2.a.2.2 also requires, at least once per 31 days, that the associated line starter be energized and the valve position indicator lights be verified to indicate open and then the line starter be de-energized. For Unit 2, ITS SR 3.5.2.2 requires periodic verification that the HHSI pump minimum flow valve is open with power to the valve operator removed. This changes the CTS by deleting the requirement to periodically energize the line starter to verify that the valve is open using the position indicator lights.	SR 3.5.2.2	4.5.2.a.2	5
ITS 3.5.2 CTS 3.5.2	L.6	CTS 4.5.2.c.2 requires periodic verification that each ECCS subsystem is aligned to receive electrical power from separate OPERABLE emergency buses. ITS 3.5.2 does not include this Surveillance Requirement. This changes the CTS by deleting the requirement to periodically verify that each ECCS subsystem is aligned to receive electrical power from separate OPERABLE emergency buses.	NA	4.5.2.c.2	5
ITS 3.5.2 CTS 3.5.2	L.7	CTS 4.5.2.e.1 requires visual inspection of the containment sump and verification that the subsystem suction inlets are not restricted by debris and the sump components (trash racks, screens, etc.) and that sump components show no evidence of structural distress or corrosion. ITS SR 3.5.2.7 contains the same requirements, but it is only necessary to verify that sump components show no evidence of abnormal corrosion. This changes the CTS by only requiring verification of no evidence of <u>abnormal</u> corrosion versus no evidence of corrosion.	SR 3.5.2.7	4.5.2.e.1	6
ITS 3.5.2 CTS 3.5.2	L.8	CTS 4.5.2.f.2 requires verification that ECCS automatic valves in the flow path actuate to their correct position. ITS SR 3.5.2.5 requires verification that ECCS automatic valves in the flow path that are not locked, sealed, or otherwise secured in position, actuate to their correct position. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position, from the verification.	SR 3.5.2.5	4.5.2.f.2	6

Table L
Less Restrictive Changes
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.5.2 CTS 3.5.2	L.9	CTS 4.5.2.f.2 and 4.5.2.f.3 require verification of automatic actuation of ECCS components on a Safety Injection signal. ITS SR 3.5.2.5 states that automatic actuation of ECCS components may be performed with an actual or simulated actuation signal. This changes the CTS by removing the detail of the signal from the Surveillance Requirements and explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.5.2.5	4.5.2.f.2 and 4.5.2.f.3	6
ITS 3.5.2 CTS 3.5.2	L.10	The Unit 2 CTS surveillance requirement 4.5.2.f.1 requires cycling each power operated (excluding automatic) valve in the flow path through at least one complete cycle of full travel every 18 months. The Unit 1 version of this surveillance is the same except it applies to valves that are not testable during plant operation. The corresponding ITS 3.5.2 does not contain a similar surveillance to the CTS 4.5.2.f.1 requirement. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance requirement 4.5.2.f.1.	NA	4.5.2.f.1	5
ITS 3.5.3 CTS 3.5.3	L.1	CTS 3.5.3 Action a, when no ECCS subsystem is OPERABLE due to inoperability of the centrifugal charging pump or the flow path from the refueling water storage tank, allows 1 hour to restore one ECCS subsystem or requires the plant to be in MODE 5 in the next 20 hours. ITS 3.5.3 Action A allows 1 hour to restore the required ECCS train to OPERABLE status. If this Required Action and associated Completion Time are not met, ITS 3.5.3 Action B allows 24 hours to place the plant in MODE 5. This changes the CTS by extending the shutdown Completion Time from 20 to 24 hours.	Action B	Action a	3
ITS 3.5.3 CTS 3.5.3	L.2	CTS 3.5.3 Action b requires that a Special Report be prepared and submitted to the NRC within 30 days following an ECCS actuation that results in water being injected into the Reactor Coolant System. The report is to describe the circumstances of the actuation and the total accumulated actuation cycles to date. ITS 3.5.3 does not include this requirement. This changes the CTS by deleting this reporting requirement.	NA	Action b	8

Table L
Less Restrictive Changes
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.5.3 CTS 3.5.3	L.3	CTS 3.5.3 Action a addresses when no ECCS subsystem is OPERABLE due to inoperability of the centrifugal charging pump or the flow path from the refueling water storage tank (RWST) and allows 1 hour to restore one ECCS subsystem or requires the plant to be in MODE 5 in the next 20 hours. CTS 3.5.3 provides no Actions to address the inoperability of a required Low Head Safety Injection (LHSI) pump or, for Unit 2, a required recirculation spray pump. ITS 3.5.3 Action A addresses the Condition of the required ECCS train inoperable (i.e., no ECCS train is OPERABLE). The CTS is revised to conform to the ITS. This changes the CTS Action by not limiting the reason for inoperability to the required charging pump or the flow path from the RWST.	Action A	Action a	4
ITS 3.5.5 U2 CTS 3.5.4 U1 CTS 3.5.5		NONE			
ITS 3.5.4 CTS 3.1.2.8	L.1	The CTS 3.1.2.8 Action allows 1 hour to restore the RWST when it is inoperable. ITS 3.5.4 Action A allows 8 hours to restore the RWST to OPERABLE status if the inoperability is due to RWST boron concentration or temperature not within limits. This changes the CTS by increasing the Completion Time for the specified RWST inoperabilities from 1 hour to 8 hours.	Action A	Actions	3
ITS 3.5.4 CTS 3.1.2.8	L.2	Unit 1 CTS 4.1.2.8.a.2 requires periodic verification that RWST borated water volume is between a minimum and a maximum value. The Unit 1 CTS 4.1.2.8.a.2 maximum contained volume limit is 441,100 gallons. ITS SR 3.5.4.2 requires verification that the RWST borated water volume is greater than or equal to a minimum value. This changes the Unit 1 CTS by deleting the verification requirement for the RWST maximum borated water volume.	SR 3.5.4.2	4.1.2.8.a.2	6

* Change Categories:

- 1 - Relaxation of LCO Requirements
- 2 - Relaxation of Applicability
- 3 - Relaxation of Completion Time
- 4 - Relaxation of Required Action
- 5 - Deletion of Surveillance Requirement
- 6 - Relaxation of Surveillance Requirement Acceptance Criteria

Table L
Less Restrictive Changes
Section 3.5 - Emergency Core Cooling Systems

7 - Relaxation of Surveillance Frequency

8 - Deletion of Reporting Requirement

Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.1 CTS 3.6.1.1	L.1	The CTS surveillance 4.6.1.1.a.1 contains requirements for verifying containment penetration isolation device (valves or flanges) status (inside and outside containment). The corresponding ISTS surveillances (ITS SR 3.6.3.2 & SR 3.6.3.3) are modified by a Note. The ISTS note allows verification of valve position and blind flange status in high radiation areas to be accomplished by administrative controls. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by allowing the required periodic containment isolation device position verifications in high radiation areas to be accomplished by means other than a visual inspection of the valve.	SR 3.6.3.2 & SR 3.6.3.3	4.6.1.1.a.1	6
ITS 3.6.1 CTS 3.6.1.1	L.2	CTS surveillance 4.6.1.1.a.1 contains the requirement for verifying containment isolation device (valves or flanges) status inside and outside the containment. The corresponding ISTS surveillances (ITS SR 3.6.3.2 & SR 3.6.3.3) also contain the requirement to verify containment penetration isolation device status inside and outside the containment. However, the corresponding ISTS surveillances are modified such that isolation devices (valves or flanges) that are locked, sealed, or otherwise secured in position are exempt from the surveillance. The CTS surveillance is revised to conform to the ISTS requirement. This changes the CTS by providing an exception to the surveillance requirement for isolation devices that are locked, sealed or otherwise secured in position.	SR 3.6.3.2 & SR 3.6.3.3	4.6.1.1.a.1	6
ITS 3.6.1 CTS 3.6.1.1	L.3	CTS surveillance 4.6.1.1.a.2 requires that all equipment hatches be verified closed and sealed every 31 days. The corresponding ISTS surveillance requirements for containment do not have a specific surveillance for the equipment hatch. However, ISTS 3.6.1 contains a surveillance (SR 3.6.1.1) to perform the required leakage rate testing specified in the containment leakage rate testing program. The leakage rate testing program specifies acceptance criteria and requires Type B testing be performed in accordance with the provisions of the applicable federal regulations. The CTS is revised to conform to the ISTS. The change results in replacing the more frequent CTS requirement to verify the equipment hatch is sealed with a surveillance to perform the required containment leakage rate testing.	SR 3.6.1.1	4.6.1.1.a.2	7
ITS 3.6.1 CTS 3.6.1.1	L.4	CTS surveillance 4.6.1.1.b requires that containment integrity be verified by confirming that each air lock is in compliance with Specification 3.6.1.3. The corresponding ISTS requirements do not contain a surveillance to verify the requirements of another TS are met. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating CTS surveillance 4.6.1.1.b.	NA	4.6.1.1.b	5

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.1 CTS 3.6.1.1	L.5	Footnote 1 to CTS surveillance 4.6.1.1.a.1 addresses the verification of valve and blind flange status inside containment. The CTS surveillance specifies in part that the verification be performed during each Cold Shutdown. The corresponding ISTS surveillance (ITS SR 3.6.3.3) specifies the required verification be performed prior to entering Mode 4 from Mode 5. Both the CTS and ISTS also have a 92 day requirement in which the surveillance must be performed prior to entering Mode 4. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by not specifying the surveillance only be performed in Cold Shutdown (Mode 5).	SR 3.6.3.3	4.6.1.1.a.1, Footnote 1	7
ITS 3.6.1 CTS 3.6.1.1	L.6	CTS surveillance 4.6.1.1.a.1 verifies the status of the containment penetrations and is moved from the CTS Containment Integrity TS (3.6.1.1) to ITS 3.6.3, Containment Isolation Valves. Although the CTS surveillance is retained within the TS it is moved into a TS (ITS 3.6.3) where different Actions will be applicable if the surveillance is not met. The Actions for CTS 3.6.1.1 require that containment integrity be restored within one hour or Action is taken to place the plant in a Mode where containment integrity is no longer required. CTS 3.6.1.1 does not have any provisions for separate Action entry for each affected penetration. In the ISTS, the surveillances monitoring the status of containment penetrations are addressed in ISTS 3.6.3, Containment Isolation Valves. The Actions applicable in ITS 3.6.3 if the containment isolation valve status surveillances are not met may provide 1, 4 or 72 hours (depending on the type of penetration and the number of failed isolation valves) to restore the penetration to the required status before action must be taken to remove the plant from the applicable Mode. In addition, the Actions for inoperable containment isolation valves in ITS 3.6.3 are modified by a Note (ITS 3.6.3 Actions Note 2) that permits separate Action Condition entry for each penetration flow path. As such, the proposed change affects the CTS by allowing more time to restore each containment penetration to the required status when the affected surveillance is not met. In addition, the proposed change also results in a separate Action entry and Completion Time being established for each penetration that is not in compliance with the affected surveillance.	3.6.3 Actions & SRs	Actions & 4.6.1.1.a.1	3
ITS 3.6.1 CTS 3.6.1.2		NONE			

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.2 CTS 3.6.1.3	L.1	CTS surveillance 4.6.1.3.a.2.b requires that air lock leakage be verified within the limit following maintenance performed on the outer personnel air lock door which may result in a decrease in closure force on any part of the door sealing surface. The ISTS 3.6.2 surveillance requirements do not contain a similar air lock leakage verification. The ISTS does not typically contain post maintenance testing requirements in the TS. The CTS is revised to conform to the ISTS. This changes the CTS by eliminating the post maintenance air lock leakage test requirement from the TS.	NA	4.6.1.3.a.2.b	5
ITS 3.6.2 CTS 3.6.1.3	L.2	CTS surveillance 4.6.1.3.b requires that the air lock door interlock mechanism be verified operable at least once per 18 months during shutdown. The corresponding ISTS surveillance (SR 3.6.2.2) only specifies the interlock be verified once per 24 months. The CTS is revised to conform to the ISTS. This changes the CTS by extending the surveillance interval from 18 months to 24 months and eliminating the requirement to perform the surveillance during shutdown conditions.	SR 3.6.2.2	4.6.1.3.b	7
ITS 3.6.2 CTS 3.6.1.3	L.3	CTS 3.6.1.3 contains the containment air lock requirements. The CTS Actions are revised by Note 3 that states, "Enter the ACTION of LCO 3.6.1.1 and 3.6.1.2, when air lock leakage results in exceeding the combined containment leakage rate acceptance criteria". The corresponding ISTS Action Note 3 states, Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate." The CTS is revised to conform to the ISTS. This changes the CTS by revising the basis for entering the 1-hour Action time of the Containment LCO. The CTS requires the one hour Action time of the containment integrity LCO and containment leakage LCO to be entered when the combined leakage rate (total Type B and C leakage limit) is exceeded. The ISTS does not have a separate containment leakage LCO. In the ISTS, the containment integrity and leakage specifications are combined into a single containment LCO. As such, the corresponding ISTS note requires the 1-hour Action time of the single containment LCO to be entered when the overall containment leakage rate is exceeded.	Action Note	Action Note	1, 4
ITS 3.6.4 CTS 3.6.1.4		NONE			

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.5 CTS 3.6.1.5		NONE			
ITS 3.6.1 CTS 3.6.1.6		NONE			
ITS 3.6.6 CTS 3.6.2.1	L.1	The U2 CTS surveillance 4.6.2.1.c.1 requires cycling each power operated (excluding automatic) valve in the flow path through at least one complete cycle of full travel every 18 months. The U1 version of this surveillance is the same except it applies to valves that are not testable during plant operation. The corresponding ITS 3.6.6 does not contain a similar surveillance to the U1 or U2 CTS 4.6.2.1.c.1. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance 4.6.2.1.c.1.	NA	4.6.2.1.c.1	5
ITS 3.6.6 CTS 3.6.2.1	L.2	CTS Surveillance 4.6.2.1.c.2 requires verification that each automatic valve in the flow path actuates to its correct position on a test signal. ISTS SR 3.6.6.3 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test.	SR 3.6.6.3	4.6.2.1.c.2	6
ITS 3.6.6 CTS 3.6.2.1	L.3	CTS Surveillances 4.6.2.1.c.2 and 4.6.2.1.c.3 require verification of the automatic actuation of QS components on a test signal. The corresponding ISTS SR 3.6.6.3 and SR 3.6.6.4 specify that the testing may be performed with an actual or simulated actuation signal. The CTS is revised to conform to the ISTS. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.6.3 and SR 3.6.6.4	4.6.2.1.c.2 and 4.6.2.1.c.3	6
ITS 3.6.6 CTS 3.6.2.1	L.4	Unit 1 only. Unit 1 CTS surveillance 4.6.2.1.c specifies that the automatic valve actuation, and automatic pump start surveillances (4.6.2.1.c.2 and .3) be performed at least once per 18 months during shutdown. The corresponding ISTS surveillances (and the corresponding Unit 2 surveillances) are required to be performed once per 18 months. The Unit 1 surveillance is revised to conform to the ISTS and the corresponding Unit 2 surveillances. This changes the Unit 1 surveillance by eliminating the requirement to perform the associated surveillances during shutdown conditions.	SRs	4.6.2.1.c, 4.6.2.1.c.2 and .3	7

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.7 CTS 3.6.2.2	L.1	CTS surveillance 4.6.2.2.b requires that each RSS subsystem be verified operable when tested pursuant to Specification 4.0.5, by manually starting each recirculation spray pump and verifying the pump shaft rotates. The corresponding ISTS surveillance do not include this requirement. The CTS is revised to conform to the ISTS. This changes the CTS by deleting CTS surveillance requirement 4.6.2.2.b.	NA	4.6.2.2.b	5
ITS 3.6.7 CTS 3.6.2.2	L.2	CTS Surveillances 4.6.2.2.c and 4.6.2.2.e.2 require verification of the automatic actuation of RSS components on a Containment pressure high-high signal and a test signal. The corresponding ISTS SR 3.6.7.3.a and SR 3.6.7.3.b specify that the testing may be performed with an actual or simulated actuation signal. The CTS is revised to conform to the ISTS. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.7.3.a and SR 3.6.7.3.b	4.6.2.2.c and 4.6.2.2.e.2	6
ITS 3.6.7 CTS 3.6.2.2	L.3	The U2 CTS surveillance 4.6.2.2.e.1 requires cycling each power operated (excluding automatic) valve in the flow path through at least one complete cycle of full travel every 18 months. The U1 version of this surveillance is the same except it applies to valves that are not testable during plant operation. The corresponding ITS 3.6.7 does not contain a similar surveillance to the U1 or U2 CTS 4.6.2.2.e.1. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance 4.6.2.2.e.1.	NA	4.6.2.2.e.1	5
ITS 3.6.7 CTS 3.6.2.2	L.4	CTS Surveillance 4.6.2.2.e.2 requires verification that each automatic valve in the flow path actuates to its correct position on a test signal. ISTS SR 3.6.7.3.a requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test.	SR 3.6.7.3.a r	4.6.2.2.e.2	6
ITS 3.6.7 CTS 3.6.2.2	L.5	Unit 1 only. Unit 1 CTS 3.6.2.2 Action statement b applies to two inoperable RSS subsystems and requires one subsystem to be restored to operable status within 72 hours or the plant must be placed in Mode 3 in 6 hours and Mode 5 in 30 hours. The corresponding ISTS Actions for two inoperable subsystems (ITS 3.6.7 Conditions B and D) are similar except that a total of 84 hours (ITS 3.6.7 Cond D) are allowed to reach Mode 5 instead of a total of 36 hours (6 plus 30) that the Unit 1 CTS Action b allows. The CTS is revised to conform to the ISTS. This changes the CTS by extending the time allowed by the Actions to reach Mode 5 from Mode 3. The proposed change effectively allows 48 additional hours after the plant is placed in Mode 3 to reach Mode 5 (6+48+30= 84).	Action B & D	Action b	3

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.7 CTS 3.6.2.2	L.6	Unit 1 only. Unit 1 CTS surveillance 4.6.2.2.e specifies that the automatic valve actuation, and automatic pump start surveillances (4.6.2.2.e.1 and .2) be performed at least once per 18 months during shutdown. The corresponding ISTS surveillances (and the corresponding Unit 2 surveillances) are required to be performed once per 18 months. The Unit 1 surveillance is revised to conform to the ISTS and the corresponding Unit 2 surveillances. This changes the Unit 1 surveillance by eliminating the requirement to perform the associated surveillances during shutdown conditions.	SRs	4.6.2.2.e, 4.6.2.2.e.1 and .2	7
ITS 3.6.8 CTS 3.6.2.3	L.1	The CTS 3.6.2.3 Action addresses one inoperable chemical addition subsystem. The CTS requires that the inoperable subsystem must be restored within 72 hours. The corresponding ISTS Action (ITS 3.6.8, Condition A) addresses an inoperable spray additive system and requires restoration within 72 hours. The CTS is revised to conform to the ISTS. This changes the CTS by expanding the scope of the Action to address more than just an inoperable subsystem.	Action A	Actions	4
ITS 3.6.8 CTS 3.6.2.3	L.2	The U2 CTS surveillance 4.6.2.3.d.1 requires cycling each power operated (excluding automatic) valve in the flow path through at least one complete cycle of full travel every 18 months. The U1 version of this surveillance is the same except it applies to valves that are not testable during plant operation. The corresponding ITS 3.6.8 does not contain a similar surveillance to the U1 or U2 CTS 4.6.2.3.d.1. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance 4.6.2.3.d.1.	NA	4.6.2.3.d.1	5
ITS 3.6.8 CTS 3.6.2.3	L.3	CTS Surveillances 4.6.2.3.d.2 and 4.6.2.3.d.3 require verification of the automatic actuation of spray additive components on a test signal. The corresponding ISTS SR 3.6.8.4 and SR 3.6.8.5 specify that the testing may be performed with an actual or simulated actuation signal. The CTS is revised to conform to the ISTS. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.6.8.4 and SR 3.6.8.5	4.6.2.3.d.2 and 4.6.2.3.d.3	6
ITS 3.6.8 CTS 3.6.2.3	L.4	CTS Surveillance 4.6.2.3.d.2 requires verification that each automatic valve in the flow path actuates to its correct position on a test signal. ISTS SR 3.6.8.4 requires verification that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in position actuates to its correct position on an actual or simulated actuation signal. The CTS surveillance is revised to conform to the ISTS. This changes the CTS by excluding those valves that are locked, sealed, or otherwise secured in position from this test.	SR 3.6.8.4	4.6.2.3.d.2	6

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.8 CTS 3.6.2.3	L.5	Unit 1 only. Unit 1 CTS surveillance 4.6.2.3.d specifies that the automatic valve actuation, and automatic pump start surveillances (4.6.2.3.d.2 and .3) be performed at least once per 18 months during shutdown. The corresponding ISTS surveillances (and the corresponding Unit 2 surveillances) are required to be performed once per 18 months. The Unit 1 surveillance is revised to conform to the ISTS and the corresponding Unit 2 surveillances. This changes the Unit 1 surveillance by eliminating the requirement to perform the associated surveillances during shutdown conditions.	SRs	4.6.2.3.d, 4.6.2.3.d.2 and .3	7
ITS 3.6.3 CTS 3.6.3.1	L.1	Once a penetration flow path is isolated in accordance with the applicable Action, the CTS Actions also require that the penetration flow path be periodically verified isolated to ensure the Actions continue to be met for extended periods. The corresponding ITS Actions provide an allowance (Action Notes 1 and 2) to verify the isolated penetration flow paths by administrative means if the isolation device is in a high radiation area or if the isolation device is locked, sealed, or otherwise secured in its required position. The CTS is revised to conform to the ITS. This changes the CTS by allowing the Action to be accomplished by administrative means.	Action Notes	Actions	4

Table L
Less Restrictive Changes
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.6.3 CTS 3.6.3.1	L.2	<p>CTS 3.6.3.1 contains a note that provides an exception for locked or sealed closed valves that states, "Locked or sealed closed valves, except for the containment purge supply and exhaust valves, may be opened on an intermittent basis under administrative control." The ISTS does not contain this note. However, the ISTS valve position surveillances (ITS SR 3.6.3.2 and SR 3.6.3.3) contain an exception to the surveillance that allows valves to be open under administrative control. The allowances in the ITS surveillances and the allowance to open valves under administrative controls provided by the Action note (ITS Note 1 and CTS Note 3) and the separate surveillance that requires the containment purge and exhaust valves to be maintained closed and deactivated without any exceptions for administrative controls (ITS SR 3.6.3. and CTS 4.6.3.1.a) together accomplish the same purpose as the CTS note regarding the exception for locked or sealed closed valves. However, the allowance to open valves under administrative controls provided by the ITS surveillances is not restricted to locked or sealed closed valves and does not specify that the valves can only be opened "on an intermittent basis." The CTS is revised to conform to the ITS. The net result of this change is that it changes the CTS note allowance by allowing all valves addressed by the ITS surveillances (manual valves) to be open under administrative controls and not limiting the provision of the exception to locked or sealed closed valves and not limiting the exception to open on an intermittent basis. Thus, this change effectively relaxes the criteria for meeting the valve position surveillance requirements.</p>	Action Note, SR 3.6.3.2 and SR 3.6.3.3	Note	6

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.1 CTS 3.7.1.1	L.1	CTS LCO 3.7.1.1, Table 3.7-2 lists the orifice size for the main steam safety valves. ITS 3.7.1 does not contain this information. This changes the CTS by eliminating the diameter of the MSSVs from the Technical Specifications. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431.	Table 3.7.1-2 a & b	Table 3.7-2	1
ITS 3.7.5 CTS 3.7.1.2	L.1	CTS 4.7.1.2.1 requires the verification of each AFW manual, power operated, and automatic valve in each water flow path, and in both steam supply flow paths to the steam turbine driven AFW pump, that is not locked, sealed, or otherwise secured in position, is in the correct position at least once per 31 days. ITS SR 3.7.5.1 requires the identical verification of AFW valves except the requirement provides an 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. This changes the CTS by adding to the existing requirement a specific operability allowance for meeting the Surveillance Requirement. The exception allows the system to be out of its normal standby alignment and temporarily incapable of automatic initiation without declaring the affected AFW train(s) inoperable.	SR 3.7.5.1	4.7.1.2.1	6
ITS 3.7.5 CTS 3.7.1.2	L.2	CTS 4.7.1.2.3 requires the testing of the AFW pumps on a STAGGERED TEST BASIS (STB) at a Frequency in accordance with the Inservice Testing (IST) program. ITS SR 3.7.5.2 requires the AFW pumps tested in accordance with the IST program. This changes the CTS requirements by eliminating the need to specify testing on a STB for the AFW pumps.	SR 3.7.5.2	4.7.1.2.3	7
ITS 3.7.5 CTS 3.7.1.2	L.3	CTS 3.7.1.2, Action c and Action d. states the plant must be in HOT SHUTDOWN "within the following 6 hours." This is a total shutdown Completion Time of 12 hours whenever two AFW trains are inoperable or the requirements stated in Action c cannot be met. ITS 3.7.5 Condition D states the plant must be in MODE 4 within 18 hours. This changes the time to be in MODE 4 from 12 hours to 18 hours. The CTS has been revised to incorporate and extend the Completion Time by an additional 6 hours to be in MODE 4.	Action D	Action c, d	3

Table L
Less Restrictive Changes
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.5 CTS 3.7.1.2	L.4	CTS surveillance 4.7.1.2.2 requires cycling each manual Service Water to Auxiliary Feedwater System valve through at least one complete cycle at least once per 31 days. In addition, CTS surveillance 4.7.1.2.6 requires cycling each power operated (excluding automatic) valve in the AFW flowpath through at least one complete cycle at least once per 18 months during shutdown. The corresponding ITS 3.7.5 does not contain a similar surveillance requirement for either 4.7.1.2.2 or 4.7.1.2.6. The CTS is revised to conform to the ISTS. This changes the CTS by deleting surveillance requirements 4.7.1.2.2 and 4.7.1.2.6.	NA	4.7.1.2.2, 4.7.1.2.6	5
ITS 3.7.5 CTS 3.7.1.2	L.5	CTS 3.7.1.2 Action d requires the plant to be in MODE 3 within 6 hours and in MODE 4 within the following 6 hours whenever two AFW trains are inoperable in MODE 1, 2, or 3. ITS 3.7.5, as modified by TSTF-412, allows one motor driven AFW train and one required steam supply to the turbine driven AFW train to be inoperable for up to 24 hours before requiring a plant shutdown to MODE 4. The CTS is changed by adding an additional relaxation to allow an out-of-service time of 24 hours for an inoperable AFW motor driven train coincident with an inoperable required steam supply to the AFW turbine driven train in MODE 1, 2, or 3. This change makes the CTS consistent with the ISTS as modified by TSTF-412.	Actions	Action d	4
ITS 3.7.5 CTS 3.7.1.2	L.6	CTS 3.7.1.2, Action c and Footnote (2) allows an extended Completion Time 90 hours versus 6 hours to shutdown from Mode 3 to Mode 4 whenever the turbine driven AFW pump is inoperable in Mode 3 prior to entering Mode 2 following a refueling outage. The extended time of 90 hours provided by CTS footnote (2) is intended to be additional time for restoration of the turbine-driven pump in Mode 3 prior to requiring the plant to be placed in Mode 4. Therefore, the CTS Action c cumulative time is considered to be a total of <u>162</u> hours (72+90) from entry into CTS Action c until entry into Mode 4 is required. The corresponding ITS 3.7.5 Condition A allows 7 days (168 hours) restoration time and ITS Condition D allows an additional 18 hours to transition from Mode 3 to Mode 4 whenever the turbine driven AFW pump is inoperable in Mode 3 prior to entering Mode 2 following a refueling outage. As such, the ITS cumulative time from entry into Condition A until entry into Mode 4 is required (by Condition D) is a total of <u>186</u> hours (168+18). Therefore, the ITS provides an additional <u>24</u> hours (<u>186-162</u>) beyond the time allowed in the CTS. The CTS has been revised to incorporate and extend the 90 hours provided in footnote (2) for restoring an inoperable turbine-driven AFW pump by an additional 24 hours for a total of <u>114</u> hours (90+24).	Action A & D	Action c & footnote (2)	3

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.6 CTS 3.7.1.3	L.1	CTS 3.7.1.3 Action b allows 4 hours to demonstrate Operability of the reactor plant river water system (Unit 1) or the service water system (Unit 2) as a backup water supply to the auxiliary feedwater pumps whenever the PPDWST is inoperable. ITS 3.7.6 Required Action A.1 requires the verification by administrative means the Operability of the backup water supply. This changes the CTS by replacing the word "demonstrate" with "verify by administrative means" in the Required Action. Eliminating the requirement to "demonstrate" and replacing the requirement with "verify by administrative means" prevents a potential misinterpretation of the requirement of what constitutes "demonstration" of Operability.	Action A.1	Action b	4
ITS 3.7.6 CTS 3.7.1.3	L.2	CTS 3.7.1.3, Action b. states that if demonstration of the Operability of the backup water supply is not satisfied and if the PPDWST is not restored to Operable status within 7 days, the plant must be in HOT SHUTDOWN within the next 12 hours. ITS 3.7.6 Condition B states that if verification of the Operability of the backup water supply is not satisfied or an inoperable PPDWST is not restored to OPERABLE status within 7 days, the plant must be in MODE 3 within 6 hours and MODE 4 without reliance on the steam generators for heat removal within 24 hours. This changes the time to be in MODE 4 without reliance on the steam generators for heat removal from 12 hours to 24 hours. The CTS has been revised to incorporate and extend the Completion Time by an additional 12 hours to be in MODE 4.	Action B	Action b	3
ITS 3.7.13 CTS 3.7.1.4	L.1	CTS Table 4.7-2 contains the sampling and analysis program associated with CTS 3.7.1.4 and referenced in CTS surveillance 4.7.1.4. Item #1 on Table 4.7-2 requires that the gross activity determination be completed at least 3 times per 7 days with a maximum time of 72 hours between samples. The corresponding ISTS 3.7.18 (ITS 3.7.13) requirements do not specify any sampling to be performed to determine the gross activity of the secondary coolant. The CTS is revised by the deletion of item #1 on Table 4.7-2. This changes the CTS by deleting the requirement for gross activity determination. By the deletion of this requirement, the need for Table 4.7-2 is also eliminated. Therefore, this change includes the deletion of CTS Table 4.7-2 as well.	NA	Table 4.7-2	5
ITS 3.7.2 CTS 3.7.1.5	L.1	CTS 3.7.1.5 is applicable in MODES 1, 2, and 3. ITS LCO 3.7.2 is applicable in MODE 1, and in MODES 2 and 3 except when all MSIVs are closed and deactivated. This changes the CTS by making the specification not applicable in MODES 2 and 3 when all MSIVs are closed and deactivated.	Applicability	Applicability	2

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.2 CTS 3.7.1.5	L.2	CTS 3.7.1.5 Action for MODES 2 and 3 allows only one MSIV to be inoperable. If more than one MSIV is inoperable; LCO 3.0.3 entry is required. ITS 3.7.2 Action C allows one or more MSIVs to be inoperable in MODES 2 and 3, and contains a Note stating, "Separate Condition entry is allowed for each MSIV." This changes the CTS by allowing more than one MSIV to be inoperable and in the closed position in MODES 2 and 3.	Actions	Actions	4
ITS 3.7.2 CTS 3.7.1.5	L.3	LCO 3.7.1.5 requires the MSIVs be OPERABLE in MODES 1, 2, and 3. CTS 4.0.4 requires MSIVs to be tested prior to entry into the MODES of Applicability. ITS SR 3.7.2.1 contains a Note stating the testing of the MSIVs is only required to be performed in MODES 1 and 2. This allowance permits entry into MODE 3 for the purpose of performing the required testing. This changes the CTS by allowing the plant the option to enter MODE 3 prior to the performance of the required testing.	SR 3.7.2.1	Applicability	6
ITS 3.7.3 CTS NA		NONE			
ITS 3.7.7 CTS 3.7.3.1	L.1	CTS 4.7.3.1.b verifies every 31 days that each CCW valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position is in the correct position. ITS SR 3.7.7.1 requires the same surveillance but contains a Note clarifying the isolation of the CCW flow to individual components does not render the CCW system inoperable. The CTS has been revised by adding a Note providing clarification the CCW system is not rendered inoperable by the isolation of flow to individual components.	SR 3.7.7.1	4.7.3.1.b	6
ITS 3.7.7 CTS 3.7.3.1	L.2	CTS 4.7.3.1.c requires at least once per 18 months during shutdown, the cycling of each power operated valve servicing safety related equipment that is not testable during plant operation, through at least one complete cycle of full travel. The ITS does not contain this surveillance requirement. The CTS has been revised to conform to the ITS by eliminating the current surveillance requirement for cycling the power operated valves.	NA	4.7.3.1.c	5

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.7 CTS 3.7.3.1	L.3	CTS 3.7.3.1 contains no explicit provision for action when two CCW trains are inoperable. As a result, the unit would require entry into Specification 3.0.3 and the initiation of a unit shutdown to MODE 5 (exiting the Mode of Applicability). However, with two trains of CCW inoperable, sufficient cooling capacity to place and maintain the unit in Mode 5 may not exist. Proposed new Condition C of ITS LCO 3.7.7 would acknowledge this plant condition and provide a more appropriate action in lieu of LCO 3.0.3 for entering Mode 5. The proposed new Action would require an immediate action be initiated to restore one train of CCW to OPERABLE status. The new Condition would only replace LCO 3.0.3 when there is insufficient CCW flow to the RHR heat exchangers such that the unit could not be safely maintained in Mode 5 as required by LCO 3.0.3. The CTS is revised to incorporate the new and more appropriate Action for the condition of two inoperable CCW trains. The addition of the new Action is consistent with the similar ISTS Actions for three inoperable AFW pumps that supercede LCO 3.0.3 until at least one train of AFW is restored to operable status.	Action C	Actions	4
ITS 3.7.7 CTS 3.7.3.1	L.4	CTS 4.7.3.1.b verifies every 31 days that each CCW valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position is in the correct position. ITS SR 3.7.7.1 requires the same surveillance but clarifies that the acceptance criterion of the CCW System services "the RHR system" rather "safety related equipment." The CTS has been revised to add this clarification to the CCW system surveillance requirement.	SR 3.7.7.1	4.7.3.1.b	6
ITS 3.7.8 CTS 3.7.4.1	L.1	CTS 4.7.4.1.b verifies every 31 days that each SWS valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position is in the correct position. ITS SR 3.7.8.1 requires the same surveillance but contains a Note clarifying that the isolation of the SWS flow to individual components does not render the SWS inoperable. The CTS has been revised by adding a Note providing clarification that the SWS is not rendered inoperable by the isolation of flow to individual components.	SR 3.7.8.1	4.7.4.1.b	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.8 CTS 3.7.4.1	L.2	CTS 4.7.4.1.c requires at least once per 18 months during shutdown, the cycling of each power operated valve servicing safety related equipment that is not testable during plant operation, through at least one complete cycle of full travel. The ITS does not contain this surveillance requirement but instead requires (ITS SR 3.7.8.2) the verification of "each SWS automatic valve in the flow path ... on an actual or simulated signal." The CTS has been revised by eliminating the current surveillance requirement for cycling the power operated valves.	SR 3.7.8.2	4.7.4.1.c	5
ITS 3.7.8 CTS 3.7.4.1	L.3	CTS 3.7.4.1 contains no explicit provision for action when two SWS trains are inoperable. As a result, the unit would require entry into Specification 3.0.3 and the initiation of a unit shutdown to MODE 5 (exiting the Mode of Applicability). However, with two trains of SWS inoperable, sufficient cooling capacity to place and maintain the unit in Mode 5 may not exist. Proposed new Condition C of ITS LCO 3.7.7 would acknowledge this plant condition and provide a more appropriate action in lieu of LCO 3.0.3 for entering Mode 5. The proposed new Action would require an immediate action be initiated to restore one train of SWS to operable status. The new Condition would only replace LCO 3.0.3 when there is insufficient SWS flow to the CCW heat exchangers (which provide RHR cooling) such that the unit could not be safely maintained in Mode 5 as required by LCO 3.0.3. The CTS is revised to incorporate the new and more appropriate Action for the condition of two inoperable SWS trains. The addition of the new Action is consistent with the similar ISTS Actions for three inoperable AFW pumps that supercede LCO 3.0.3 until at least one train of AFW is restored to operable status.	Action C	NA	4
ITS 3.7.9 CTS 3.7.5.1		NONE			
ITS 3.7.4 CTS NA		NONE			
ITS 3.7.11 CTS 3.7.6		NONE			

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.10 CTS 3.7.7.1 (U1) & CTS 3.7.7 (U2)		NONE			
ITS NA CTS 3.7.8.1		NONE			
ITS 3.7.12 CTS 3.9.12	L.1	CTS 4.9.12.1 requires the verification that all fuel building doors are closed at least once per 12 hours. In addition, the CTS permits opening the fuel building doors for entry and exit. ITS 3.7.12 does not require a surveillance on the doors but contains a Note in the LCO that allows the boundary to be opened intermittently under administrative controls. The CTS has been revised to delete the surveillance requirement for the doors and to incorporate the broader ISTS LCO Note allowing intermittent opening of the fuel building boundary.	NA	4.9.12.1	5
ITS 3.7.12 CTS 3.9.12	L.2	CTS surveillance 4.9.12.2 requires 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. Specification 4.7.8 includes surveillance 4.7.8.1.a which requires that the SCLRS be demonstrated operable at least once per 31 days by initiating, from the control room, flow through the "standby" HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes with the heater controls operational. Although the corresponding ISTS surveillances include a similar requirement, the proposed SCLRS ITS 3.7.12 does not include this monthly surveillance. Thus, the CTS is changed by the elimination of this monthly requirement to run the system for 15 minutes to verify operability.	NA	4.9.12.2	5
ITS 3.7.15 CTS 3.9.11		NONE			

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.7.14 CTS 3.9.14		NONE			
ITS 3.7.16 CTS 3.9.14 (U1) CTS 3.9.15 (U2)	L.1	CTS 4.9.14.2 (Unit 1 only) requires a verification that the fuel pool boron concentration is ≥ 1050 ppm within 8 hours prior to and at least once per 24 hours during movement of fuel assemblies in the spent fuel pool. In addition, CTS 4.9.14.2 requires this verification every 31 days whenever fuel assemblies are stored in the spent fuel storage pool. ITS 3.7.16 does not require a specific surveillance prior to movement of fuel assemblies and every 31 days, but includes a requirement for a surveillance to be performed every 7 days in accordance with the new Applicability of the ISTS (i.e., only if a fuel storage pool verification has not been performed since the last fuel movement). The CTS has been revised to delete the surveillance requirement specific to prior to the movement of fuel assemblies in the spent fuel pool and the 31 day surveillance that must be performed whenever fuel is stored in the spent fuel pool. The CTS surveillances are replaced with the ISTS surveillance which addresses fuel movement and the need to confirm storage locations after movement is complete.	NA	4.9.14.2	5

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.1	<p>CTS LCO 3.0.5 states when a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation 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 3.8.1 Required Action A.2 requires the declaration of required feature(s), with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by Required Action A.2 is 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 24 hours before declaring a required feature inoperable, when an offsite source and a redundant required feature are inoperable.</p>	Action A.2	3.0.5	3
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.2	<p>CTS LCO 3.0.5 states when a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation 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 Required Action B.2 requires the declaration of required feature(s), with no EDG available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by the Required Action B.2 is 4 hours from discovery of inoperable DG on one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 4 hours before declaring a required feature inoperable, with a DG and a redundant required feature inoperable.</p>	Action B.2	3.0.5	3

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.3	CTS 3.8.1.1 Action b requires within 24 hours of a DG becoming inoperable, the OPERABLE DG must be started in accordance with CTS SR 4.8.1.1.2.a.5. This action is required due to any cause other than an independently testable component, testing or preplanned preventative maintenance and must be completed regardless of when the inoperable DG is restored to OPERABILITY. The surveillance requirement is not required to be performed if the absence of any potential for common mode failure can be demonstrated for the OPERABLE DG. ITS Action B.3.1 requires a determination that the OPERABLE DG is not inoperable due to a common cause failure. This determination is required to be completed or ITS SR 3.8.1.2, a DG start, must be performed within 24 hours. This changes the CTS requirements by modifying the potential common mode failure requirement and eliminating the requirement that the test be completed regardless of whether the inoperable EDG is restored to OPERABLE status.	Action B 3.1	Action b	4
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.4	(Unit 2 only) The Unit 2 CTS 3.8.1.1 specifies a DG lube oil inventory of 504 gallons. Note: the Unit 1 CTS do not contain requirements for a DG lube oil inventory. The corresponding lube oil inventory requirement in proposed ITS 3.8.3 is 330 gallons for a 7-day supply and 283 gallons for a 6 day supply. This changes the CTS by reducing the lube oil inventory currently required for the Unit 2 DGs.	LCO	LCO	1

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.5	CTS LCO 3.0.5 states when a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation 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 3.8.1 Condition C states with two required offsite circuits inoperable. Required Action C.1 requires the declaration of required feature(s), with no offsite power available, inoperable when its redundant required feature(s) is inoperable. The Completion Time allowed by Required Action C.1 is 12 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s). This changes the CTS to allow 12 hours before declaring a required feature inoperable, when both offsite sources and a redundant required feature are inoperable.	Action C.1	3.0.5	3
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.6	Unit 2 CTS surveillance requirement 4.8.1.1.a.6 states the diesel generator will be loaded to a rating of ≥ 4238 kW for ≥ 60 minutes. ITS SR 3.8.1.3 states that each DG for Unit 2 shall be loaded to ≥ 3814 kW and ≤ 4238 kW for ≥ 60 minutes. The SR is modified by note 2 that states, "Momentary transients outside the load range do not invalidate this test." This changes the CTS by decreasing the load limit from ≥ 4238 kW to a band of operation for the DG loading requirements from $\geq 90\%$ to $\leq 100\%$ (continuous rating of the DG) and the adds a note to the SR for both units.	SR 3.8.1.3	4.8.1.1.a.6	6
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.7	CTS surveillance requirements 4.8.1.1.2.b.3 allows the start of the diesel on a simulated loss of offsite power in conjunction with a safety injection signal and 4.8.1.1.2.b.4 allows the start of the diesel on a loss of power signal. Corresponding ITS SR 3.8.1.14 states "Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ESF actuation signal." Corresponding ITS SR 3.8.1.9 requires the verification that automatic trips are bypassed on actual or simulated loss of voltage signal emergency start of the DG. This changes the CTS by allowing these SRs to be performed with actual or simulated signals.	SR 3.8.1.14	4.8.1.1.2.b.3	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.8	CTS surveillance requirement 4.8.1.1.2.b.7 states, "Verifying that the load sequence timer is OPERABLE with each load sequence timer within $\pm 10\%$ of its required value." If the requirement can not be met, the diesel generator is declared inoperable and the appropriate Actions are entered. ITS LCO 3.8.1.c requires the following AC electrical sources shall be OPERABLE with automatic load sequencers for each required DG. ITS Condition F states that with one load sequencer timer inoperable, Required Actions F.1 and F.2 must be completed immediately. A Note modifies the Condition. The Note states that separate condition entry is allowed for each sequence timer. Required Action F.1.1 specifies the affected component will be placed in a condition that prohibits the component from loading to the emergency bus. Required Action F.1.2 states enter appropriate Conditions and Required Actions for system, subsystem, or component made inoperable by the load sequencer timer(s). Required Action F.2 provides an option by allowing the DG to be declared inoperable. This changes the CTS requirements by allowing a component(s) served by an inoperable load sequence timer to be declared inoperable, instead of the DG.	3.8.1.c, Actions F.1 & F.2	4.8.1.1.2.b.7	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.9	CTS surveillance requirement 4.8.1.1.2.c.1 requires a check for and removal of accumulated water from each diesel generator day tank every 31 days. In addition, the check for and removal of water is required after each operation of a diesel that is greater than an hour in duration. ITS SR 3.8.1.5 states "Check for and remove accumulated water from each day tank." This SR must be performed every 31 days. This changes the CTS deleting the requirement to check for and remove water from the day tank when a DG is operated for more than an hour.	SR 3.8.1.5	4.8.1.1.2.c.1	5
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.10	CTS surveillance requirement 4.8.1.1.2.b.7 requires the verification of load sequence times to be within specified limits. This surveillance is required to be performed during shutdown (MODE 5 or 6). ITS SR 3.8.1.17 requires the verification of the sequenced load block be within the design interval limit for each emergency load sequence timer. A note modifies the SR that states the surveillance shall not normally be performed in MODE 1, 2, 3, and 4. The note allows the performance of the SR in MODE 1, 2, 3, or 4 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. The note also allows credit to be taken for unplanned events. This changes the CTS by allowing the performance of the surveillance in MODE 1, 2, 3, or 4 if an assessment determines that plant safety is maintained or enhanced.	SR 3.8.1.17	4.8.1.1.2.b.7	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.11	CTS surveillance requirement 4.8.1.1.2.b.5 requires each diesel to be tested every 18 months during shutdown to a specific kW load for ≥ 60 minutes. ITS SR 3.8.1.10 states that each DG is loaded for 1 hour at various loads. Unit 1 is required to run at a load of ≥ 2750 kW and ≤ 2850 kW. Unit 2 is required to run at a load of ≥ 4238 kW and ≤ 4535 kW. Three notes modify the SR. Note 3 is addressed by more restrictive change. Note 1 states "Momentary transients outside the load and power factor ranges do not invalidate this test. Note 2 allows the performance of the SR in MODE 1 or 2 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. This changes the CTS by allowing momentary transients to not invalidate the test. The SR may be performed in MODE 3 or 4 with no restrictions and in MODE 1 or 2 if an assessment evaluates that the performance of the SR does not reduce plant safety.	SR 3.8.1.10	4.8.1.1.2.b.5	6
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.12	CTS surveillance requirement 4.8.1.1.2.b.4 requires each diesel to be tested every 18 months during shutdown to verify specific non-vital trips are bypassed on an emergency start of the diesel. ITS SR 3.8.1.9 states that each DG automatic trips are bypassed on an emergency start signal. A note modifies the SR. The note allows the performance of portions of the SR in MODE 1, 2, 3, or 4 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. This changes the CTS by allowing portions of the SR to be performed in MODE 1, 2, 3 or 4 if an assessment evaluates that the performance of the SR does not reduce plant safety.	SR 3.8.1.9	4.8.1.1.2.b.4	6
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.13	CTS surveillance requirement 4.8.1.1.2.b.3 requires each diesel to be tested every 18 months during shutdown to verify operation of the diesel with a start on a simulated signal a loss of offsite power in conjunction with a safety injection signal. ITS SR 3.8.1.14 requires the DG start with specific actions to be performed on an actual or simulated loss of offsite power in conjunction with an actual or simulated ESF actuation signal. A note modifies the SR. The note allows the performance of portions of the SR in MODE 1, 2, 3, or 4 to reestablish OPERABILITY for the DG provides an assessment can determine that the safety of the plant can be maintained or enhanced. The note also allows credit to be taken for unplanned events. This changes the CTS by allowing portions of the SR to be performed in MODE 1, 2, 3 or 4 if an assessment evaluates that the performance of the SR does not reduce plant safety.	SR 3.8.1.14	4.8.1.1.2.b.3	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.14	CTS SR 4.8.1.1.2.b.2 requires the verification of the diesel generator capability to reject a load. This surveillance is required to be performed every 18 months during shutdown. ITS SR 3.8.1.8 contains the requirement to verify that a DG has the capability to reject its associated single largest post-accident load. Two notes modify the SR. Note 1 allows the performance of the SR in MODE 1 or 2 to reestablish OPERABILITY for the DG provided an assessment can determine that the safety of the plant can be maintained or enhanced. This changes the CTS by allowing the performance of the SR in MODE 1 or 2.	SR 3.8.1.8	4.8.1.1.2.b.2	6
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.15	Not used.			
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.16	Unit 2 surveillance requirement 4.8.1.1.2.f requires after any modifications which could affect diesel generator interdependence by starting from standby conditions both diesel generators to start simultaneously once every 10 years. ITS SR 3.8.1.15 requires the Unit 2 DG to start simultaneously every 10 years. A Note modifies the SR that states "Only applicable to Unit 2." This changes the CTS by deleting the requirement to be performed after any modifications which could affect diesel generator interdependence.	SR 3.8.1.15	4.8.1.1.2.f	6
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.17	CTS LCO 3.8.1.1.b.3 states for the DGs to be OPERABLE, each DG must have a separate fuel transfer pump. CTS SR 4.8.1.1.2.a.4 states that at least once per 31 days the fuel transfer pump can start and transfer fuel from the storage tank to the day tank. CTS SR 4.8.1.1.2.a.4 for Unit 1 additionally specifies this requirement includes the transfer of fuel to the engine mounted tank. ITS SR 3.8.1.6 states, "Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank." The SR must be performed every 92 days. This changes the CTS by requiring the SR to be performed every 92 days in the ITS where the CTS required it to be performed every 31 days. This change also deletes the requirement for the engine mounted tank for Unit 1.	SR 3.8.1.6	3.8.1.1.b.3, 4.8.1.1.2.a.4	7
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.18	Not used.			
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.19	Not used.			

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.20	CTS LCO 3.8.1.1 requires each diesel generator to have a separate fuel oil storage system with a minimum number of gallons of fuel oil. Unit 1 is 17,500 gallons and Unit 2 is 53,225 gallons. ITS LCO 3.8.3 Condition A states "One or more DGs with fuel oil inventory < 17,500 gal and ≥ 15,000 gal (Unit 1) or < 53,225 gal and ≥ 45,625 gal (Unit 2)." The Required Action of the ITS states that the fuel oil inventory to be restored within limits in 48 hours. This changes the CTS by allowing the fuel oil inventory to less than the minimum number of gallons for 48 hours.	3.8.3 LCO	LCO	4
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.21	Unit 2 CTS LCO 3.8.1.1 requires each diesel generator to have a separate lube oil storage inventory within the specified volume. ITS LCO 3.8.3 Condition B allows less than the specified volume of lube oil (if the remaining supply is sufficient for 6-days of continuous operation) for up to 48 hours. This changes the CTS by allowing less than the total required lube oil inventory for 48 hours.	3.8.3 Action B	LCO	4
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.22	CTS surveillance requirement 4.8.1.1.2.d.2 requires that within 31 days of obtaining a new fuel oil sample that certain fuel oil properties be verified within required limits. Failure to meet the requirements of CTS 4.8.1.1.2.d.2 results in the application of CTS Action footnote 1. The CTS Action footnote provides a 7 day delay time before the Action for an inoperable DG must be applied when fuel oil is found outside the required limits. ITS LCO 3.8.3 Condition D states for one or more DGs with new fuel oil properties not within limits, restore the fuel oil properties to within limits in 30 days. This changes the CTS by allowing 30 days (instead of 7 days) to restore the stored fuel oil properties to within specified limits.	3.8.3 Action D	4.8.1.1.2.d.2	4
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.23	CTS surveillance requirement 4.8.1.1.2 requires each diesel generator shall be demonstrated OPERABLE. Part a of the requirement states "At least once per 31 days on a STAGGERED TEST BASIS." ITS LCO 3.8.1 SRs 3.8.1.2, 3.8.1.3, 3.8.1.4, and 3.8.1.5 requires the test to be performed every 31 days. This changes the CTS by eliminating the STAGGERED TEST BASIS for testing of the DGs.	SRs 3.8.1.2, 3.8.1.3, 3.8.1.4, and 3.8.1.5	4.8.1.1.2	7
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	L.24	CTS 4.8.1.1.2.d.1.e) requires verification that new fuel oil particulate contaminants are < 10 mg/liter prior to adding the new fuel oil to the storage tanks. ITS 5.5.9 does not include a requirement to verify particulate contamination levels are < 10 mg/liter prior to addition of the new fuel oil to the storage tanks. However, the ITS continues to specify the periodic verification of particulate contamination similar to the CTS. Therefore, this change effectively relaxes the CTS requirements to verify particulate contamination is within limits by eliminating the requirement for prior to adding new fuel oil to the storage tanks.	5.5.9	4.8.1.1.2.d.1.e)	7

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.1 3.8.3 CTS 3.8.1.1	L.25	CTS surveillance 4.8.1.1.2.e requires verification that fuel oil particulate contaminants are <10 mg/liter. The corresponding ITS 5.5.9.c requires that fuel oil particulate contaminants be verified to be ≤10 mg/liter. The CTS is revised to conform to the ITS. This changes the CTS limit for particulate contamination to ≤10 mg/liter from <10 mg/liter.	5.5.9.c	4.8.1.1.2.e	6
ITS 3.8.2 CTS 3.8.1.2	L.1	CTS 3.8.1.2 in part states "With less than the above minimum required A.C. electrical power sources OPERABLE," perform specific actions until the required minimum equipment is restored. ITS 3.8.2 Action A.1 states "Declare affected required feature(s) with no offsite power available inoperable." This is a requirement of LCO 3.0.2. This must be performed immediately, or the Required Actions for suspending CORE ALTERATIONS, movement of irradiated fuel assemblies or recently irradiated fuel assemblies, and reactivity changes must be followed. This changes the CTS by allowing CORE ALTERATIONS, movement of irradiated fuel assemblies, and reactivity changes with less than the minimum AC source being OPERABLE.	Action A.1	Action a	4
ITS 3.8.2 CTS 3.8.1.2	L.2	CTS 3.8.1.2 Action a. specifies with less than the required AC electrical sources OPERABLE, operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.2 Required Actions B.2.3 and C.3 modify this requirement and state, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing operations that are a positive reactivity change.	Actions B.2.3 & C.3	Action a	4
ITS 3.8.2 CTS 3.8.1.2	L.3	CTS surveillance 4.8.1.2 specifies the surveillance requirements applicable to AC sources during shutdown conditions. CTS 4.8.1.2 states, "The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.6." The CTS shutdown surveillance refers to the surveillances required by the AC sources operating specification and only contains a single exception to the surveillances required for AC sources operating. The single exception is CTS surveillance 4.8.1.1.2.a.6 that corresponds to ITS SR 3.8.1.3. Similar to CTS 4.8.1.2, ITS SR 3.8.2.1 specifies the surveillance requirements applicable to AC sources during shutdown conditions. However, SR 3.8.2.1 contains three notes that modify the AC source surveillances required during shutdown conditions and effectively relax the surveillance acceptance criteria applicable to AC sources during shutdown conditions.	SR 3.8.1.3	4.8.1.2	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.2 CTS 3.8.1.2	L.4	CTS Surveillance requirement 4.8.1.2 states, "The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for requirement 4.8.1.1.2.a.6." The CTS excepted surveillance 4.8.1.1.2.a.6 requires the verification of the generator to synch, load to ≥ 1425 kw (Unit 1) and $\geq 4,238$ kw (Unit 2), and operate for ≥ 60 minutes. The corresponding ITS SR 3.8.1.3 represents this requirement and consistent with the intent of the CTS exception for this surveillance is also not required to be performed (per ITS 3.8.2.1 Note 1). ITS SR 3.8.2.1 corresponds to CTS 4.8.1.2 and specifies the applicable surveillances for the AC Sources shutdown. ITS SR 3.8.2.1 lists the following SRs as applicable: 3.8.1.1, 3.8.1.2, 3.8.1.3, 3.8.1.4(.1 and .2), 3.8.1.5(.1 and .2), 3.8.1.6, 3.8.1.8, 3.8.1.9, 3.8.1.10, 3.8.1.11, 3.8.1.13, and 3.8.1.14. The effect of this revised list of required SRs is to change the CTS by eliminating the requirement to meet or perform CTS surveillances 4.8.1.1.1.b (ITS SR 3.8.1.7) and 4.8.1.1.1.f (ITS SR 3.8.1.15) (Unit 2 only) to confirm AC Source shutdown operability. Thus the proposed change relaxes the CTS surveillance 4.8.1.2 by eliminating the requirement for certain surveillances.	SR 3.8.1.3	4.8.1.2	5
ITS 3.8.2 CTS 3.8.1.2	L.5	LCO 3.8.1.2 does not list an exception to LCO 3.0.3. A Note modifies ITS LCO 3.8.2 applicability that states "LCO 3.0.3 is not applicable." This changes the CTS by allowing an exception to LCO 3.0.3 requirements.	Applicability	Applicability	4
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	L.1	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 four 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. A Note is added to the LCO requirements. The Note states "One inverter may be disconnected from its associated DC bus for ≤ 24 hours to perform an equalizing charge on its associated battery, provided: The associated AC vital bus is energized from its Class 1E constant voltage source transformer, or inverter using internal AC source, and all other AC vital buses are energized from their associated OPERABLE inverters." This changes the CTS by allowing an inverter to be disconnected from the DC bus for up to 24 hours during a battery equalize charge without entry into a Condition.	LCO Note	LCO	1

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	L.2	CTS 3.8.2.1 Action a, in part, states "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 "One or more AC electrical power distribution subsystems inoperable, restore the AC electrical power distribution subsystem(s) to OPERABLE status," within 8 hours. ITS Condition E provides the Required Action if 2 or more distribution subsystem become inoperable and a loss of safety function occurs. This changes the CTS by allowing more than one subsystem to be inoperable.	Action A	Action a	4
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	L.1	CTS 3.8.2.2 Action specifies with less than the required train of A.C. Emergency Busses not fully energized in the required manner, immediately suspend all operations involving positive reactivity changes. ITS 3.8.8 and 3.8.10 Required Actions A.2.3 modify the requirements and state, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing operations that are a positive reactivity change.	A.2.3	Action	4
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	L.2	CTS 3.8.2.2 in part states "With less than the above minimum required A.C. electrical power sources OPERABLE, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, movement of irradiated fuel assemblies or movement of fuel assemblies over irradiated fuel assemblies for Unit 1, and movement of recently irradiated fuel assemblies or movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2," perform specific actions until the required minimum equipment is restored. ITS 3.8.8 and 3.8.10 Action A.1 states "Declare affected required feature(s) inoperable." This must be performed immediately, or other specific Required Actions must be followed. This changes the CTS by allowing CORE ALTERATIONS, movement of irradiated fuel assemblies, and reactivity changes with less than the minimum AC source being OPERABLE.	Action A.1	Action	4

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	L.3	CTS 3.8.2.2 states as a minimum, one of the following trains of A.C. Busses shall be OPERABLE and energized in the specified manner. The LCO specifies that either Train A or Train B equipment be OPERABLE. Each train consists of one 4160 VAC bus, one 480 VAC bus, and two 120 VAC buses. The 120 VAC bus must be powered through associated inverter from associated DC bus. CTS Action requires if the train of A.C. Emergency Busses not fully energized in the required manner, specific limitations are required. CTS surveillance requirement 4.8.2.2 requires the specified buses be energized in the required manner. ITS LCO 3.8.8 states two inverters shall be OPERABLE. LCO 3.8.10 states the necessary portion of AC and AC vital bus electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE. This changes the CTS by allowing combinations of AC for 4160 and 480 VAC buses that are necessary to support equipment to provide required safety functions.	LCO	LCO	1
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	L.4	LCO 3.8.2.2 does not list an exception to LCO 3.0.3. A Note modifies ITS LCOs 3.8.8 and 3.8.10 applicabilities are modified by a Note that states "LCO 3.0.3 is not applicable." This changes the CTS by allowing an exception to LCO 3.0.3 requirements.	LCO Note	LCO	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.1	CTS surveillance requirement 4.8.2.3.2.e and 4.8.2.3.2.f require the performance of a discharge tests verifying battery capacity at least every 18 months <u>during shutdown</u> . ITS SR 3.8.6.6 in part requires the verification of battery capacity when subjected to a performance discharge test. A Note modifies the ITS SR. The Note states "This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR". This changes the CTS by allowing portions of the surveillance to be performed in Modes 1, 2, 3, or 4 (to confirm operability) when an assessment determines safe plant operation can be maintained.	SR 3.8.6.6 Note	4.8.2.3.2.e and 4.8.2.3.2.f	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.2	CTS surveillance requirement 4.8.2.3.2.c.4 states that the battery charger will supply at least 100 amps at 140 volts for at least 4 hours. ITS SR 3.8.4.2 requires a verification of each battery charger supplying ≥ 100 amps at greater than or equal to the minimum established float voltage for ≥ 4 hours. In addition, the SR provides an alternative test method that allows a verification of each battery charger can recharge the battery to the fully charged state within 24 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state. This changes the CTS by allowing an alternate test that is not currently allowed.	SR 3.8.4.2	4.8.2.3.2.c.4	6
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.3	CTS surveillance requirement 4.8.2.3.2.d states that battery capacity is verified by subjecting the battery to a service test every 18 months during shutdown. ITS SR 3.8.4.3 requires a service test to be performed to verify the battery capacity. The test must be performed every 18 months. A Note modifies the SR that states "This Surveillance shall not normally be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR." This changes the CTS by allowing portions of the SR to be performed in MODES 1, 2, 3, or 4 and allowing credit for unplanned events.	SR 3.8.4.3 Note	4.8.2.3.2.d	6
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.4	CTS LCO 3.8.2.3 Action a, in part states with one of the battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours. ITS LCO 3.8.4 Required Action B requires with one or two batteries on one train inoperable restore the inoperable batteries to OPERABLE status in 2 hours. This changes the CTS by allowing more than one battery to be inoperable if the batteries are on the same train.	3.8.4 Action B	Action a	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.5	CTS LCO 3.8.2.3 Action b, in part states with one of the battery charger inoperable, restore the inoperable battery charger to OPERABLE status with specific limitations. ITS LCO 3.8.4 Required Action A requires with one or two battery chargers on one train inoperable restore the inoperable battery changers to OPERABLE status within specific limitations. This changes the CTS by allowing more than one battery charger to be inoperable if the battery chargers are on the same train.	3.8.4 Action A	Action b	4

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.6	CTS 3.8.2.3 Action b in part states with one of the required full capacity charger inoperable, demonstrate the OPERABILITY of its associated battery bank by performing Surveillance Requirement 4.8.2.3.2.a.1 within one hour. The requirement goes on to state that the action requires the Surveillance Requirement of 4.8.2.3.2.a.1 to be continued for at least once per 8 hours thereafter and if any Category A limit in Table 3.8-1 is not met, declare the battery inoperable. ITS LCO 3.8.4 Condition A states with one or two battery chargers on one train inoperable, restore battery terminal voltage to greater than or equal to the minimum established float voltage with 2 hours (Required Action A.1). Required Action A.2 states a verification of float current of ≤ 2 amps is required once per 12 hours. Required Action A.3 specifies that the inoperable charger(s) must be restored to OPERABLE status within 7 days. This changes the CTS by allowing the battery terminal voltage to be restored to the minimum established float voltage with float current to be ≤ 2 amps and restoring the charger(s) to OPERABLE status within 7 days.	3.8.4 Action A	Action b	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.7	CTS surveillance requirement 4.8.2.3.2.b.3 states the average electrolyte temperature of every tenth cell of connected cells is above 60 °F. ITS SR 3.8.6.4 states "Verify each battery pilot cell temperature is greater than or equal to minimum established design limits." This changes the CTS by replacing the "average" temperature requirement of "every tenth connected cell" with the requirement that "each battery pilot cell temperature is greater than or equal to minimum established design limits."	SR 3.8.6.4	4.8.2.3.2.b.3	6
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.8	CTS 4.8.2.3.2.b.1 states the battery cell parameters in Table 3.8-1 meet the Category B limits every 92 days and within 7 days after a battery discharge or overcharge condition. Category B parameters applies to each connected cell. The cell minimum voltage is stated as 2.13 volts with notation (c) listed. Notation (c) states "Corrected for average electrolyte temperature." ITS SR 3.8.6.2 states "Verify each battery pilot cell voltage is ≥ 2.07 V" and must be performed every 31 days. This changes the CTS surveillance requirement from each connected cell to the pilot cells. It also changes the voltage requirement from 2.13 to 2.07 V with no electrolyte temperature correction required. This change also eliminates the requirement to verify the Category B parameters within 7 days of a battery overcharge or discharge.	SR 3.8.6.2	4.8.2.3.2.b.1	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.9	CTS surveillance requirement 4.8.2.3.2.a.1 specifies for each battery bank's pilot cells meet the Category A limits for the parameters listed in Table 3.8 – 1 at least once per 7 days. The pilot cell requirements include electrolyte level, with the level required to be greater than the minimum level indication mark and $\leq \frac{1}{4}$ " above the maximum level indication mark. ITS SR 3.8.6.3 states "Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits," every 31 days. The information for electrolyte level is addressed by a less restrictive removal of detail change in these discussion of changes. This changes the CTS by requiring each battery connected cell electrolyte level to be verified every 31 days instead of every 7 days.	SR 3.8.6.3	4.8.2.3.2.a.1	7
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.10	CTS surveillance requirement 4.8.2.3.2.b.1 in part requires every 92 days the parameters in Table 3.8–1 to meet the Category B limits. The limit for float voltage is listed as 2.13 volts per connected cell with an allowable value for voltage of > 2.07 volts. If a cell voltage is less than 2.13 volts but above the 2.07 volts, the cell may be considered OPERABLE provided the voltage is restored to ≥ 2.13 volts within 7 days. ITS SR 3.8.6.5 requires a verification of each battery connected cell voltage every 92 days. The minimum cell voltage requirement is ≥ 2.07 volts. This changes the CTS by decreasing the required voltage for each connected cell from 2.13 to 2.07 volts.	SR 3.8.6.5	4.8.2.3.2.b.1	6
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.11	CTS surveillance requirement 4.8.2.3.2.a specifies each battery bank be demonstrated OPERABLE by requiring every 7 days that the battery parameters listed in Table 3.8-1 Category A are within limits and the battery terminal voltage is greater than a specific value while on float charge. The Category A limit is specified in a minimum voltage per pilot cell is 2.13 V. ITS SR 3.8.4.1 specifies the battery terminal voltage is greater than or equal to the minimum established float voltage and is determined every 7 days. This changes the CTS by replacing the pilot cell voltage requirement with the battery terminal voltage requirement.	SR 3.8.4.1	4.8.2.3.2.a	6
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.12	CTS surveillance requirement 4.8.2.3.2.b.1 requires the parameters in Table 3.8 – 1 to meet the Category B limits. CTS in Table 3.8 – 1 lists the allowable value for electrolyte level as "above the top of plates." ITS SR 3.8.6.3 states "Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits." This changes the CTS by deleting the requirement for electrolyte level is not overflowing.	SR 3.8.6.3	4.8.2.3.2.b.1	6

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ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.13	CTS Table 3.8-1 lists the allowable value for each connected cell float voltage as 2.07 volts. Note 2 to the table provides the actions for any Category B limits that exceeds its allowable value. The note states "For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are within their allowable values and provided the Category B parameter(s) are restored to within limits within 7 days." ITS 3.8.6 Action A requires with one or two batteries on one train with one or more battery cells float voltage < 2.07 V, perform SR 3.8.4.1 and SR 3.8.6.1 within 2 hours. The Action requires the affected cell(s) to be restored to ≥ 2.07 V within 24 hours. This changes the CTS by allowing the cell float voltage to be less than 2.07 V for 24 hours.	3.8.6 Action A	Table 3.8-1 Note 2	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.14	CTS Table 3.8-1 lists the requirements for specific gravity under the Category A, Category B, and allowable value columns. Note (b) to the table allows charging current of less than 2 amps to satisfy the specific gravity requirements. If Category A or Category B limits are not met, Notes (1) and (2) provide Actions and allowed outage times for restoring the parameter to within limits. Note 1 states "For any Category A parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that within 24 hours all the Category B measurements are taken and found to be within their allowable values, and provided all Category A and B parameter(s) are restored to within limits within the next 6 days." Note 2 states "For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are within their allowable values and provided the Category B parameter(s) are restored to within limits within 7 days." ITS 3.8.6 Action B requires with one or two batteries on one train with float current > 2 amps, perform SR 3.8.4.1 within 2 hours and restore battery float current to ≤ 2 amps within 12 hours. This changes the CTS by allowing float current to be > 2 amps for 12 hours.	3.8.6 Action B	Table 3.8-1 Note (b) & Notes (1) and (2)	4

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Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.15	CTS Table 3.8 – 1 lists the requirements for electrolyte level under the Category A, Category B, and allowable value columns. If Category A or Category B limits are not met, Notes (1) and (2) provide Actions and allowed outage times for restoring the parameter to within limits. Note 1 states “For any Category A parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that within 24 hours all the Category B measurements are taken and found to be within their allowable values, and provided all Category A and B parameter(s) are restored to within limits within the next 6 days.” Note 2 states “For any Category B parameter(s) outside the limit(s) shown, the battery may be considered OPERABLE provided that the Category B parameters are within their allowable values and provided the Category B parameter(s) are restored to within limits within 7 days.” ITS 3.8.6 Action C requires with one or two batteries on one train with one or more cells electrolyte level less than the minimum established design limits, restore the electrolyte level to above the top of the plates within 8 hours. Required Action C.2 requires the verification that there is no evidence of leakage within 12 hours. Required Action C.3 requires the electrolyte level to be restored to the minimum established design limits within 31 days. A Note modifies Condition C. The Note states “Required Action C.2 shall be completed if electrolyte level was below the top of plates.” A Note modifies the Required Actions of Condition C. The Note states “Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.” This changes the CTS by allowing electrolyte level to be lower than the top of the plates for 8 hours and less than the minimum established design limit for 31 days.	3.8.6 Action C	Table 3.8-1 Notes (1) & (2)	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.16	CTS surveillance requirement 4.8.2.3.2.b.3 requires the average electrolyte temperature of every tenth cell of connected cells is above 60 °F. If the battery electrolyte temperature is ≤ 60 °F, Action a requires with one of the required battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours. ITS 3.8.6 Action D requires with one or two batteries on one train with pilot cell electrolyte temperature less than minimum established design limits, restore the pilot cell temperature to greater than or equal to the minimum design limits within 12 hours. This changes the CTS by requiring the pilot cell temperature to be monitored and allowing an additional 10 hours to restore the temperature to above or equal to the minimum established design limit.	3.8.6 Action D	4.8.2.3.2.b.3	4

Table L
Less Restrictive Changes
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.17	CTS LCO 3.8.2.3 Action a, in part states with one of the battery banks inoperable, restore the inoperable battery bank to OPERABLE status within 2 hours. ITS 3.8.6 Action E states one or more batteries in redundant trains with battery parameters not within limits, restore battery parameters for batteries in one train to within limits in 2 hours. This changes the CTS by allowing more than one train of battery parameters to be not within limits.	3.8.6 Action E	3.8.2.3 Action a	4
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	L.18	CTS surveillance requirement 4.8.2.3.2.b.3 states "The average electrolyte temperature of every tenth cell of connected cells is above 60 °F." ITS SR 3.8.6.4 states "Verify each battery pilot cell temperature is greater than or equal to minimum established design limits." This changes the CTS by decreasing the average electrolyte temperature of every tenth cell from 60 °F to the minimum established design temperature limit which is 50 °F. The specific temperature limit is decreased from 60 °F to 50 °F.	SR 3.8.6.4	4.8.2.3.2.b.3	6
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	L.1	CTS 3.8.2.4 states as a minimum, one of the following trains of D.C. electrical equipment and busses shall be OPERABLE and energized in the specified manner. The LCO specifies Train A or Train B equipment be OPERABLE. Each train consists of two DC buses, batteries, and chargers. ITS LCO 3.8.5 states one DC subsystem shall be OPERABLE. LCO 3.8.10 states the necessary portion of DC electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE. This changes the CTS by allowing DC buses that are necessary to support equipment to provide required safety functions.	LCO	LCO	1

Table L
Less Restrictive Changes
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	L.2	CTS 3.8.2.4 Action in part states: With the above required train of D.C. electrical equipment and busses not fully OPERABLE, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, movement of irradiated fuel assemblies and movement of fuel assemblies over irradiated fuel assemblies for Unit 1, and movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2," perform specific actions until the required minimum equipment is restored. ITS 3.8.5 and 3.8.10 Action A.1 states "Declare affected required feature(s) inoperable." This must be performed immediately, or other specific Required Actions must be followed. This changes the CTS by providing alternative actions to suspending CORE ALTERATIONS, movement of irradiated fuel assemblies and movement of fuel assemblies over irradiated fuel assemblies for Unit 1, and movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies for Unit 2, and reactivity changes with less than the minimum DC source being OPERABLE.	Action A.1	Actions	4
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	L.3	CTS 3.8.2.4 Action specifies with less than the required train of D.C. equipment and busses not fully energized in the required manner, immediately suspend all operations involving positive reactivity changes shall be immediately suspended. ITS 3.8.5 and 3.8.10 Required Actions A.2.4 modify the requirements and state, "Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration." This changes the CTS requirement by allowing operations that are a positive reactivity change.	Action A.2.3	Actions	4
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	L.4	CTS surveillance requirement 4.8.2.4.2 states, "The above required 125-volt battery bank and chargers shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.3.2." Surveillance requirement 4.8.2.3.2 represents the requirement for the DC sources in an operating condition. ITS SRs 3.8.4.1, 3.8.4.2, and 3.8.4.3 represent the required surveillance requirements of the CTS. A Note modifies SR 3.8.5.1 and states, "The following SRs are not required to be performed: SR 3.8.4.2 and SR 3.8.4.3. This changes the CTS to allow specific surveillance requirements to not be performed on the required equipment during the time that only one DC subsystem is required to be OPERABLE.	SR 3.8.5.1 Note	4.8.2.4.2	6
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	L.5	LCO 3.8.2.4 does not list an exception to LCO 3.0.3. A Note modifies ITS LCOs 3.8.5 and 3.8.10 applicabilities that states "LCO 3.0.3 is not applicable." This changes the CTS by allowing an exception to LCO 3.0.3 requirements.	LCO Note	LCO	4

Table L
Less Restrictive Changes
Section 3.8 - Electrical Power Systems

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.9.1 CTS 3.9.1	L.1	CTS 3.9.1 ACTION states that when the boron concentration requirement is not met, initiate and continue boration at ≥ 30 gpm of ≥ 7000 ppm boric acid solution or its equivalent until K_{eff} is reduced to ≤ 0.95 or the boron concentration is restored to ≥ 2400 ppm, whichever is more restrictive. ISTS 3.9.1 requires initiation of action to restore boron concentration to within limit. This changes the CTS by eliminating the specific requirements for the boric acid solution to be used to restore compliance with the LCO.	Action	Action	4
ITS 3.9.1 CTS 3.9.1	L.2	CTS 4.9.1.1 requires the LCO reactivity condition to be determined prior to removing or unbolting the reactor vessel head, and prior to withdrawal of any full length control rod located within the reactor pressure vessel, in excess of 3 feet from its fully inserted position. ITS 3.9.1 does not contain this Surveillance Requirement. This changes the CTS by deleting the surveillance.	NA.	4.9.1.1	5
ITS 3.9.1 CTS 3.9.1	L.3	CTS Surveillance 4.9.1.2 specifies that boron concentration be verified at least 3 times per 7 days with a maximum time interval between samples of 72 hours. The corresponding ISTS Surveillance requires boron concentration to be verified once per 72 hours. The CTS is revised to conform to the ISTS surveillance frequency. This changes the CTS by simplifying the surveillance frequency to once per 72 hours, which slightly reduces the number of required performances.	SR 3.9.1.1	4.9.1.2	7
ITS 3.9.2 CTS 3.9.2	L.1	The LCO for CTS 3.9.2 specifies that one of the two source range neutron flux monitors have audible indication in containment and the control room. The requirement for audible indication is deleted from the ITS LCO for Nuclear Instrumentation. This change reduces the CTS requirements applicable to the source range monitors in Mode 6.	LCO	LCO	1
ITS 3.9.2 CTS 3.9.2	L.2	CTS 3.9.2 Action states that with the requirements of the above specification not met, immediately suspend all operations involving positive reactivity changes. The corresponding ISTS Action A.2 changes the requirement to suspend all positive reactivity additions to "Suspend operations that would cause introduction into the RCS coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1." The ISTS Action allows positive reactivity changes provided they do not introduce coolant into the RCS with a boron concentration below the refueling limit. This changes the CTS requirements by allowing limited positive reactivity additions.	Action	Action	4

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.9.2 CTS 3.9.2	L.3	CTS surveillance requirement 4.9.2 specifies that a CHANNEL FUNCTION TEST is required for the source range neutron flux monitors at least once per 7 days and within 8 hours prior to the initial start of CORE ALTERATIONS. The corresponding ISTS surveillance requirements do not include the performance of CHANNEL FUNCTIONAL TESTS for the source range monitors. This changes the CTS by deleting the CHANNEL FUNCTIONAL TEST requirements for the source range monitors in Mode 6.	SR 3.9.2.1	4.9.2	5
ITS NA CTS 3.9.3		NONE			
ITS 3.9.3 CTS 3.9.4	L.1	The CTS LCO requirement 3.9.4.c.2 specifies each penetration providing direct access from the containment atmosphere to the outside atmosphere 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 is revised to be consistent with the design and licensing bases associated with BVPS Units 1 and 2. The proposed changes are made to more accurately reflect the BVPS specific design. The proposed revisions to the CTS include the following changes to the LCO 3.9.4.c. requirement and associated surveillances: a) The requirement to be capable of being closed by an operable Containment Purge and Exhaust System and the associated surveillances which verify isolation valve actuation and the system flow rate (necessary for response time) are made applicable to Unit 2 only, and b) The requirement for the Purge and Exhaust System air flow to be exhausted to an OPERABLE Supplemental Leak Collection and Release System (SLCRS) train and the surveillance to verify an operable SLCRS train are made applicable to Unit 1 only.	LCO	LCO	1

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.9.4 CTS 3.9.8.1	L.1	CTS 3.9.8.1 Action states, in part, that with less than one RHR loop in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System. The corresponding ISTS Action A.1 states that with the RHR loop requirements not met, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1. The CTS is revised to conform to the ISTS. This changes the CTS by allowing coolant with boron concentration less than the RCS boron concentration, but greater than the boron concentration limit in LCO 3.9.1, to be added to the RCS when the RHR requirements are not met.	Action A.1	Action a	4
ITS 3.9.4 CTS 3.9.8.1	L.2	CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. The corresponding ISTS 3.9.4 Action A.6 states, in part, that with the RHR loop requirements not met, within 4 hours 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, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. The CTS is revised to conform to the ISTS. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when the RHR requirements are not met.	Action A.6	Action a	4
ITS 3.9.4 CTS 3.9.8.1	L.3	CTS 4.9.8.1.a specifies that the required RHR loop be verified in operation and circulating ≥ 1000 gpm twice per shift when the RCS is in a reduced inventory condition. The CTS surveillance is modified by an asterisk footnote that defines a reduced inventory condition. The corresponding ISTS specification does not contain any similar requirements to the CTS surveillance. Consistent with the ISTS, this CTS surveillance requirement and associated footnote are deleted. This changes the CTS by eliminating CTS Surveillance 4.9.8.1.a.	NA	4.9.8.1.a	5

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.9.4 CTS 3.9.8.1	L.4	CTS LCO 3.9.8.1 requires that one RHR loop be operable and in operation. The corresponding ISTS LCO requires the same thing. However, the ISTS LCO is modified by a Note that provides an allowance for the required RHR loop to be removed from service (i.e., circulating reactor coolant) when the RHR loop is used to drain the reactor cavity to the RWST. The ISTS Note also requires that when the RHR loop is removed from service that it remains capable of being re-aligned to the RCS (to restore full reactor coolant circulation if needed). The CTS is revised to incorporate the provisions of the ISTS LCO Note. This changes the CTS by providing a specific allowance in the Technical Specification to remove the required RHR loop from circulating reactor coolant for use in draining the reactor cavity to the RWST.	LCO Note	LCO	1
ITS 3.9.5 CTS 3.9.8.2	L.1	The CTS 3.9.8.2 LCO requirement is revised by the addition of two ISTS LCO Notes. Note 1 allows all RHR pumps to be removed from operation for ≤ 15 minutes when switching from one train to another, provided several conditions are met. Note 2 allows one required RHR loop to be inoperable for up to 2 hours for Surveillance testing, provided that the other loop is OPERABLE and in operation. This changes the CTS by providing exceptions to the LCO requirement for a limited time for specific reasons and under certain conditions.	LCO Notes	NA	1
ITS 3.9.5 CTS 3.9.8.2	L.2	CTS Surveillance 4.9.8.2 requires verification that each RHR loop is OPERABLE per Specification 4.0.5. The corresponding ISTS does not contain this Surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by replacing CTS 4.9.8.2 with the ISTS surveillance applicable for this TS (ITS SR 3.9.5.1 & SR 3.9.5.2).	NA	4.9.8.2	5
ITS 3.9.5 CTS 3.9.8.2	L.3	The Actions for containment closure in CTS 3.9.8.1 are applicable to CTS 3.9.8.2. CTS 3.9.8.1 Action a states, in part, that with less than one RHR loop in operation, close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours. The corresponding ISTS 3.9.5 states, in part, that with the RHR loop requirements not met, within 4 hours 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, or verify each penetration is capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System. The CTS is revised to conform to the ISTS. This changes the CTS Actions by allowing penetrations capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System to remain open when the RHR requirements are not met.	Action B.5.2	Actions	4

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 3.9.5 CTS 3.9.8.2	L.4	CTS LCO 3.9.8.2 requires that two RHR loops be operable and one RHR loop in operation. The corresponding ISTS LCO requires the same thing. However, the proposed BVPS ITS 3.9.5 LCO is modified by a Note (#3) that provides an allowance for the RHR loop required to be operating to be removed from service (i.e., circulating reactor coolant) when the RHR loop is used to drain the reactor cavity to the RWST. The ITS Note also requires that when the RHR loop is removed from service that it remains capable of being re-aligned to the RCS (to restore full reactor coolant circulation if needed). The proposed BVPS ITS LCO Note is not consistent with the corresponding ISTS. The CTS is revised to incorporate the provisions of the proposed BVPS ITS LCO Note. This changes the CTS by providing a specific allowance in the Technical Specification to remove the required RHR loop from circulating reactor coolant for use in draining the reactor cavity to the RWST.	LCO Note 3	LCO	1
ITS 3.9.3 ITS 3.3.6 CTS 3.9.9	L.1	(Unit 2 only) CTS surveillance 4.9.9 specifies the testing required for the containment purge and exhaust isolation valves. Surveillance 4.9.9 requires containment purge and exhaust system valve actuation and isolation timing verification every 7 days. The corresponding ITS SRs 3.9.3.3 and 3.9.3.4 require that the containment isolation valve actuation on a simulated or actual actuation signal (hi radiation and manual) as well as isolation timing be verified every 18 months. A note that takes exception to the surveillance when the valves are closed per the LCO requirement modifies the ISTS surveillance. The CTS is revised to conform to the ISTS. This changes the CTS valve actuation and isolation timing verification surveillance interval from 7 days to 18 months.	SR 3.9.3.3 & SR 3.9.3.4	4.9.9	7
ITS 3.9.3 ITS 3.3.6 CTS 3.9.9	L.2	(Unit 2 only) CTS Surveillance 4.9.9 requires verification of purge and exhaust valve actuation on a high radiation signal and manually. The corresponding ITS SR 3.9.3.3 specifies that the testing may be performed with an actual or simulated actuation signal. The CTS is revised to conform to the ISTS. This changes the CTS by explicitly allowing the use of either an actual or simulated signal when performing the required test.	SR 3.9.3.3	4.9.9	6
ITS 3.9.6 CTS 3.9.10		NONE			

Table L
Less Restrictive Changes
Section 3.9 - Refueling Operations

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 4.0 - Design Features

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 4.0 CTS 5.0		NONE			

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.

Table L
Less Restrictive Changes
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	Description of Change	ITS Requirement	CTS Requirement	Category *
ITS 5.0 CTS 6.0	L.1	Not used.			
ITS 5.0 CTS 6.0	L.2	CTS 6.17, "Containment Leakage Rate Testing Program," provides containment leakage rate acceptance criteria. Specifically, the CTS provide details for the minimum pathway leakage rate (MNPLR) basis. ISTS 5.5.16 (ITS 5.5.12) does not contain this level of detail in the Containment Leakage Rate Testing Program. The CTS has been revised to delete this level of detail.	5.5.12	6.17	6
ITS 5.0 CTS 6.0	L.3	CTS 6.8.6.a. provides the requirements for the Radioactive Effluent Controls Program. CTS 6.8.6.a.5) states, "Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days." The corresponding ITS 5.5.2.e states "Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days. This changes CTS 6.8.6.a.5) to be consistent with the RETS requirements relocated from the Technical Specification to the Offsite Dose Calculation Manual in accordance with Generic Letter 89-01.	5.5.2.e	6.8.6.a	6
ITS 5.0 CTS 6.0	L.4	CTS 4.0.5.c states "The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities." The above required Frequencies referenced in CTS 4.0.5.c are listed in CTS 4.0.5.b. CTS 4.0.5.b contains a list of test intervals referenced in the ASME Inservice Test Requirements. However, the list of test intervals in CTS 4.0.5.b is not a comprehensive list. As such, proposed ITS 5.5.4.b (which corresponds to CTS 4.0.5.c) states "The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities. The proposed BVPS ITS 5.5.4.b would replace CTS 4.0.5.c and be applicable to all the test intervals referenced in the ASME Inservice Testing requirements and not just the more common test intervals listed in CTS 4.0.5.b.	5.5.4.b	4.0.5.c & b	7

Table L
Less Restrictive Changes
Section 5.0 - Administrative Controls

* Change Categories:

- 1 - Relaxation of LCO Requirements
 - 2 - Relaxation of Applicability
 - 3 - Relaxation of Completion Time
 - 4 - Relaxation of Required Action
 - 5 - Deletion of Surveillance Requirement
 - 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - 7 - Relaxation of Surveillance Frequency
 - 8 - Deletion of Reporting Requirement
- Specific NSHC used when a change does not fit the above Categories.