April 7, 2006

Mr. John T. Conway
Site Vice President
Monticello Nuclear Generating Plant
Nuclear Management Company, LLC
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - DRAFT SAFETY EVALUATION FOR THE CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (TAC NOS. MC7505, MC7597 THROUGH MC7611, AND MC8887)

Dear Mr. Conway:

Enclosed are (1) a draft amendment with license conditions and an implementation date, and (2) a draft Safety Evaluation (SE), including tables describing the changes from current Technical Specifications to improved Technical Specifications (ITSs) for the Monticello Nuclear Generating Plant (MNGP). The enclosed documents are based on (1) your application dated June 29, 2005, and (2) the information provided to the Nuclear Regulatory Commission (NRC) staff through the joint NRC MNGP ITS Conversion web page, which will be documented in one of the letters discussed in the following paragraph. To expedite review of the application, the NRC staff agreed to place its requests for additional information (RAIs) on the web page. Your staff agreed to then provide responses to the RAIs on the web page.

The enclosed draft amendment and draft SE are being provided for your review. These draft documents are not yet in final form. The NRC staff has additional evaluations to complete and incorporate into the SE by about April 14, 2006. The issuance of these drafts permits you an early opportunity to start you review. Please review the enclosed draft amendment and SE for technical accuracy and provide your comments in writing.

You will need to submit the four letters described in Section 1.0 of the draft SE before the NRC can issue the amendment approving the ITSs. These letters include (1) any changes to your license amendment request dated June 29, 2005, and (2) responses to the NRC RAIs that are on the web page. The staff will review these letters to verify that the information provided agrees with the draft SE. It would also be prudent for your staff to begin finalizing the certified MNGP ITSs for submittal to the NRC to facilitate issuance of the conversion amendment.

If you have any questions concerning this letter and the draft SE, contact me at 301-415-3049, tab3@nrc.gov.

Sincerely,

**/RA/**

Terry A. Beltz, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosures:
1. Draft Amendment
2. Draft Safety Evaluation

cc w/encls: See next page

If you have any questions concerning this letter and the draft SE, contact me at 301-415-3049, tab3@nrc.gov.

Sincerely,

**/RA/**

Terry A. Beltz, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosures:
1. Draft Amendment
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| DATE | 4/7/06 | 4/7/06 | 4/7/06 | 4/7/06 |

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# DRAFT AMENDMENT

ENCLOSURE 1

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-263

MONTICELLO NUCLEAR GENERATING PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.
License No. DPR-22



1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Nuclear Management Company (the licensee) dated June 29, 2005, as supplemented by letter dated April XX, 2006, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (I) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.2 of Facility Operating License No. DPR-22 is hereby amended to read as follows:

    The Technical Specifications contained in Appendix A, as revised through Amendment No.      , are hereby incorporated in the license. NMC shall operate the facility in accordance with the Technical Specifications.

3. This amendment authorizes the relocation of certain current Technical Specification requirements and operating license conditions to other licensee-controlled documents. Implementation of this amendment shall include the relocation of these requirements to the other documents, as described in (1) Section 5.0 of the NRC staff's Safety Evaluation, and (2) Table LA of Removed Details and Table R of Relocated Specifications attached to the NRC staff's Safety Evaluation, which is enclosed with this amendment.

4. A new license condition, 2.C.9, will be added to address performance of new and revised Surveillance Requirements (SRs):

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

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

    For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

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

5. This license amendment is effective as of its date of issuance and shall be implemented by no later than June 30, 2006.

FOR THE NUCLEAR REGULATORY COMMISSION

L. Raghavan, Branch Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance:

ATTACHMENT TO LICENSE AMENDMENT NO. ____

TO FACILITY OPERATING LICENSE NO. DPR-22

DOCKET NO. 50-263

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

| REMOVE | INSERT |
|---|---|
| 5 | 5, 6 |
| All pages | All pages |

8. Additional Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. , are hereby incorporated into this license. NMC shall operate the facility in accordance with the Additional Conditions.

9. Implementation of New and Revised Surveillance Requirements

For surveillance requirements that are new in Amendment No. , the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.

For surveillance requirements that existed prior to Amendment No. , whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

For surveillance requirements that existed prior to Amendment No. , that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.



For surveillance requirements that existed prior to Amendment No. , whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.

10. Removed Details and Requirements Relocated to Other Controlled Documents

License Amendment No. authorizes the relocation of certain technical specifications and operating license conditions, if applicable, to other licensee-controlled documents. Implementation of this amendment shall include relocation of these requirements to the specified documents.

D. NMC shall immediately notify the NRC of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

E. Northern States Power Company shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

F. NMC shall observe such standards and requirements for the protection of the environment as are validly imposed pursuant to authority established under Federal and State law and as determined by the Commission to be applicable to the facility covered by this facility operating license.

G. This license is effective as of the date of issuance and shall expire at midnight, September 8, 2010.

FOR THE NUCLEAR REGULATORY COMMISSION

Original, signed by: Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

Attachments:
1. Appendix A - Technical Specifications
2. Appendix B - (Deleted per Amendment 15, 12/17/82)
3. Appendix C - Additional Conditions

Date of Issuance: January 9, 1981

# DRAFT SAFETY EVALUATION

ENCLOSURE 2

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.    TO FACILITY OPERATING LICENSE NO. DPR-22

NUCLEAR MANAGEMENT COMPANY, LLC

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

## 1.0 INTRODUCTION

By application dated June 29, 2005, the Nuclear Management Company (NMC, or the licensee), requested changes to the technical specifications (TSs) for the Monticello Nuclear Generating (MNGP), to convert the current TSs (CTSs) to improved TSs (ITSs).

The supplemental letter(s) to the application provided the following for the proposed ITS conversion:



- Letter dated April XX, 2006, which supplements the licensee's application and provide the revisions to the TS changes in the application, additional technical information, and proposed license conditions for the implementation of this amendment.
- Letter dated April XX, 2006, which provides the licensee's comments to the Nuclear Regulatory Commission (NRC) staff's draft safety evaluation (SE) for the proposed amendment issued March xx, 2006.
- Letter dated April XX, 2006, which provides a copy of the NRC requests for additional information (RAIs) and the licensee's responses to the RAI questions that are on the NRC-MNGP ITS Conversion web page discussed below.
- Letter dated April XX, 2006, which provides the clean copy of TS pages to be issued in this amendment.

The following safety evaluation (SE) on the proposed ITS conversion is based on the application dated June 29, 2005, and the information provided to the NRC through the NRC-MNGP ITS Conversion web page. To expedite review of the application, the NRC staff posted its RAIs to a secure database through the MNGP ITS Conversion web page. The licensee then posted RAI responses to the database, also through the web page. Access to the RAI database is restricted so that only designated licensee and NRC staff can enter information into the database; however, the public can enter the database to read the questions and responses. To comply with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.4 for written communications for license amendment requests and to have the database on the MNGP docket, the licensee will submit a copy of the complete database to the NRC before the amendment is issued. The public can access the database through the NRC web site at www.nrc.gov by the following process: (1) click on the tab labeled "Nuclear Reactors" on the

RC home page along the upper part of the web page, (2) then click on the link to "Operating Reactors" which is under "Regulated Activities" on the left hand side of the web page, (3) then click on the link to "Improved Standard Technical Specifications" which is on the right hand side of the page, (4) under the Conversion to Standard Technical Specifications paragraph, click on the link to "Improved Technical Specifications Data Base" at the bottom of the page to open the database, and finally (5) click on the “Monticello Nuclear Power Plant Licensing Database” to access the RAIs and responses. The RAIs and responses to RAIs are organized by ITS Sections 1.0, 2.0, 3.0, 3.1 through 3.9, 4.0, and 5.6, which are listed first, and the beyond scope issues (BSIs) 1a through 9. For every listed ITS section or BSI, there is an RAI which can be read by clicking on the ITS section or BSI number. The licensee's responses are shown by a solid triangle adjacent to the ITS section or BSI number, and, to read the response, you click on the triangle. To page down through the ITS sections to the BSIs, click on "next" along the top of the page or on "previous" to return to the previous page.

The additional information provided in the supplemental letter dated April XX, 2006, does not expand the scope of the application as noticed and does not change the NRC staff’s original notice published in the *Federal Register* on November 16, 2005 (70 FR 70889).

The NRC staff conducted a pre-submittal meeting with the licensee on the proposed amendment on December 7, 2004, and a subsequent public meeting on August 16, 2005.

## 2.0 BACKGROUND



MNGP has been operating with the TSs issued with the original Facility Operating Licenses dated January 9, 1981, as amended. The proposed conversion to the ITSs is based upon:

- NUREG-1433, "Standard Technical Specifications for General Electric Plants, BWR/4, Revision 3, published June 2004;
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132); and
- 10 CFR 50.36, “Technical Specifications,” as amended July 19, 1995 (60 FR 36953);
- The MNGP CTSs.

Hereinafter, the proposed TSs for MNGP are referred to as the ITSs, the existing TSs are referred to as the CTSs, and the improved standard TSs, given in NUREG-1433, are referred to as the ISTSs. The corresponding Bases are ITS Bases, CTS Bases, and ISTS Bases, respectively. For convenience, a list of acronyms used in this SE is provided in Attachment 1 to this SE.

In addition to basing the ITSs on the ISTSs, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTSs as a basis for the ITSs. During the course of its review, the NRC staff issued several RAIs and conducted a series of telephone conference calls and meetings with the licensee. These RAIs, meetings, and conference calls served to clarify the ITSs with respect to the guidance in the Final Policy Statement and the ISTSs. In addition, based on these discussions, the licensee also proposed changes of a generic nature that were not in the ISTSs. The NRC staff requested that the licensee submit such generic changes as proposed changes to the ISTSs through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the MNGP ITSs. Consistent with the Commission's Final Policy

Statement and 10 CFR 50.36, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the MNGP Updated Safety Analysis Report (USAR) and Technical Requirements Manual (TRM)), for which changes to the documents by the licensee are controlled by a regulation (e.g., 10 CFR 50.59) and which may be changed without prior NRC approval. NRC-controlled documents, such as the TSs, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITSs, and to define more clearly the appropriate scope of the ITSs. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the CTSs for MNGP, while still satisfying the requirements of 10 CFR 50.36. During its review, the NRC staff relied on the Final Policy Statement and 10 CFR 50.36, and the ISTSs as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that use of the licensee's proposed ITSs based on ISTSs, as modified by plant-specific changes, is acceptable for continued operation of MNGP. This SE also explains the NRC staff's conclusion that the ITSs are consistent with the MNGP current licensing basis and the requirements of 10 CFR 50.36.

The license conditions included in the proposed amendment will make enforceable the following aspects of the conversion: (1) the schedule for the first performance of new and revised surveillance requirements (SRs) (four conditions); and (2) the relocation of CTS requirements into licensee-controlled documents as part of the implementation of the ITSs.



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

## 3.0 REGULATORY REQUIREMENTS

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

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

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences. As recorded in the Statements of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports" (33 FR 18610, December 17, 1968), the Commission noted that applicants were expected to incorporate into their TSs "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Pursuant to 10 CFR 50.36, TSs are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TSs. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, utility owners groups and the NRC staff developed ISTSs (e.g., NUREG-1433) that would establish model TSs based on the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TSs, which gives appropriate consideration to human factors engineering principles and was used throughout the development of plant-specific ITSs.

In September 1992, the Commission issued NUREG-1433, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The ISTSs in NUREG-1433 were established as a model for developing the ITSs for General Electric (GE) BWR/4 plants, in general. The ISTSs reflect the results of a detailed review of the application of the Interim Policy Statement criteria which have been incorporated in 10 CFR 50.36 (c)(2)(ii), to generic system functions, which were published in a "Split Report" issued to the nuclear steam supply system vendor owners groups in May 1988. ISTSs also reflect the results of extensive discussions concerning various drafts of ISTSs so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1433 provide an abundance of information regarding the extent to which the ISTSs present requirements that are necessary to protect public health and safety. The ISTSs in NUREG-1433, Revision 3, as modified, apply to MNGP.



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

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in

> the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

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

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

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

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

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

Part 4.0 of this SE explains the NRC staff's conclusion that the conversion of the MNGP, to ITSs based on ISTSs, as modified by plant-specific changes, is consistent with the MNGP, current licensing bases, the requirements and guidance of the Final Policy Statement, and 10 CFR 50.36.

## 4.0 EVALUATION

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

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

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

L Less Restrictive - Changes to the CTSs that result in reduced restrictions or added flexibility.

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

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

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

The changes to the CTSs, as presented in the ITS application, are listed and described in the following five tables (for each ITS section) provided as Attachments 2 through 6 to this SE:



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

These tables provide a summary description of the proposed changes to the CTSs, references to the specific CTS requirements that are being changed, and the specific ITS requirements that incorporate the changes. The tables are only meant to summarize the changes being made to the CTSs. The details as to what the actual changes are and how they are being made to the CTSs or ITSs are provided in the licensee's application and supplemental letter.

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

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

The control of specifications, requirements, and information relocated from the CTSs to licensee-controlled documents is described in Section F below, and other CTS changes (i.e., beyond-scope changes, changes beyond the scope of a TS conversion) are described in Section G below.

A. Administrative Changes to the CTS

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

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



Table A attached to this SE lists the administrative changes being made in the MNGP ITS conversion. Table A is organized in ISTS order by each A-type DOC to the CTSs, provides a summary description of the administrative change that was made, and provides CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and the ISTSs, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. More Restrictive Changes to the CTSs

The licensee, in electing to implement the specifications of the ISTSs, proposed a number of requirements that are more restrictive than those in the CTSs. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTSs, or have additional restrictions that are not in the CTSs, but are in the ISTSs. Examples of more restrictive requirements are placing an LCO on plant equipment that is not required by the CTSs, more restrictive requirements to restore inoperable equipment, and more restrictive SRs.

Table M attached to this SE lists the more restrictive changes being made in the MNGP ITS conversion. Table M is organized in ISTS order by each M-type DOC to the CTSs, provides a summary description of each more restrictive change that was adopted, and references to the affected CTSs and ITSs. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive Changes to the CTSs

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

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



Category 1 – Relaxation of LCO Requirement
Category 2 – Relaxation of Applicability
Category 3 – Relaxation of Completion Time
Category 4 – Relaxation of Required Action
Category 5 – Deletion of SR
Category 6 – Relaxation of SR Acceptance Criteria
Category 7 – Relaxation of Surveillance Frequency, Non-24 Month Type
Category 8 – Deletion of Reporting Requirements
Category 9 – Deletion of SR Shutdown Performance Requirements
Category 10 – Changing Instrumentation Allowable Values

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

Category 1 – Relaxation of LCO Requirement

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

Category 2 – Relaxation of Applicability

The CTSs require compliance with the LCO during the applicable Mode(s) or other conditions specified in the Specification's Applicability statement. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem, or component specified in the LCO, the licensee proposed to change the LCO to establish a consistent set of requirements in the ITSs. These modifications or deletions are acceptable because, during the operational or other conditions specified in the ITSs applicability requirements, the LCOs are consistent with the applicable safety analyses. Changes involving relaxation of applicability requirements are consistent with the guidance established by the ISTSs, taking into consideration the MNGP current licensing basis. Therefore, based on the above, Category 2 changes are acceptable.



Category 3 – Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, the TSs specify time limits for completing Required Actions of the associated TS Conditions. Required Actions establish remedial measures that must be taken within specified Completion Times. Completion Times specify limits on the duration of plant operation in a degraded condition. Incorporating longer Completion Times is acceptable because such Completion Times will continue to be based on the operability status of redundant TSs required features, the capacity and capability of remaining TS-required features, providing a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a DBA occurring during the repair period. Changes involving relaxation of Completion Times are consistent with the guidance established by the ISTSs, taking into consideration the MNGP current licensing basis. Therefore, based on the above, Category 3 changes are acceptable.

Category 4 – Relaxation of Required Action

LCOs specify the lowest functional capability or performance level of equipment that is deemed adequate to ensure safe operation of the facility. When an LCO is not met, the CTSs specify actions to restore the equipment to its required capability or performance level, or to implement remedial measures providing an equivalent level of protection. Compared to CTS-required actions, certain proposed ITS actions would result in extending the time period during which the licensee may continue to operate the plant with specified equipment inoperable. (Upon expiration of this time period, further action, which may include shutting down the plant, is required.) Changes of this type include providing an option to (1) isolate a system, (2) place equipment in the state assumed by the safety analysis, (3) satisfy alternate criteria, (4) take manual actions in place of automatic actions, (5) “restore to operable status” within a specified time frame, (6) place alternate equipment into service, or (7) use more conservative TS instrumentation actuation setpoints. The resulting ITS actions provide measures that adequately compensate for the inoperable equipment, and are commensurate with the safety importance of the inoperable equipment, plant design, and industry practice. Therefore, these action requirements will continue to ensure safe operation of the plant. Changes involving relaxations of action requirements are consistent with the guidance established by the ISTSs, taking into consideration the MNGP current licensing basis. Therefore, based on the above, Category 4 changes are acceptable.

Category 5 – Deletion of Surveillance Requirement

The CTSs require maintaining LCO-specified structures, systems, and components (SSCs) operable by meeting SRs in accordance with specified SR frequencies. This includes conducting tests to demonstrate that such SSCs are operable and LCO-specified parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes of this category relate to deletion of CTS SRs, including deletion of an SR in its entirety, deletion of acceptance criteria, and deleting the conditions required for performing the SR.



Deleting the SRs, including acceptance criteria and/or conditions for performing the SRs, for these items provides operational flexibility, consistent with the objective of the ISTSs, without reducing confidence that the equipment is operable. For example, the CTSs contain SRs that are not included in the ISTSs for a variety of reasons. This includes deletion of SRs for measuring values and parameters that are not necessary to meet ISTS LCO requirements. Also, the ISTSs may not include reference to specific acceptance criteria contained in the CTSs, because these acceptance criteria are not necessary to meet ISTS LCO requirements, or are defined in other licensee-controlled documents. The changes to SR acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable as defined by the ISTSs.

Deleting conditions for performing SRs includes not requiring testing of deenergized equipment (e.g., instrumentation channel checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). Also included is allowing verification of the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning such valves small. Waiving performance of a surveillance under these conditions is acceptable because the equipment is already performing its intended safety function.

The deletion of these CTS SRs optimizes test requirements for the affected safety systems and increases operational flexibility. Changes involving relaxations of SRs, as described, are consistent with the guidance established by the ISTSs, taking into consideration the MNGP current licensing basis. Therefore, based on the above, Category 5 changes are acceptable.

Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria

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

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



Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval (frequency) thereafter, the CTSs require establishing the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test, at a specified frequency based on the reliability and availability of the LCO-required components. Relaxations of CTS SRs would include extending the interval between the SRs. This interval is the surveillance test interval (STI). These relaxations of CTS SR frequencies (or extending the STI) optimize test requirements for the affected safety systems and increase operational flexibility. These CTS SR frequency relaxations (or extending the STI) are consistent with the guidance established by the ISTSs in consideration of the MNGP current licensing basis.

Category 8 – Deletion of Reporting Requirements

The CTSs contain requirements that are redundant to reporting regulations in 10 CFR. For example, CTSs include requirements that a “Reportable Event” is any of those conditions specified in 10 CFR 50.73. However, consistent with the ISTSs, the ITSs would omit many of the CTS reporting requirements because the reporting requirements in the regulations cited do not need repeating in the TSs to ensure timely submission to the NRC. Therefore, Category 8 changes have no impact on the safe operation of the plant. Deletion of these requirements is beneficial because it reduces the administrative burden on the licensee and in turn allows increased attention to plant operations important to safety. Therefore, Category 8 changes have no impact on the safe operation of the plant and are acceptable.

Category 9 – Deletion of Surveillance Requirement Shutdown Performance Requirements

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

Category 10 – Changing Instrumentation Allowable Values

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



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

Table L attached to this SE lists the less restrictive changes being made in the MNGP ITS conversion. Table L, which is organized in ISTS order by each L-type DOC to the CTSs, provides a summary description of the less restrictive change that was made, the CTS and ITS references, and a reference to the specific change type discussed above.

D. Removed Details

When requirements have been shown to give little or no safety benefit, their removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups' comments on the ISTSs. The NRC staff reviewed generic relaxations contained in the ISTSs and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The MNGP design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the ISTSs and thus provide a basis for ITSs. A significant number of changes to the CTSs involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through 6 as described below:

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

The design of the facility is required to be described in the USAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved Quality Assurance Program Description (QAPD). The regulation at 10 CFR 50.59 specifies controls for changing the facility as described in the USAR. The regulation at 10 CFR 50.54(a) specifies criteria for changing the QAPD. The TRM is a general reference in the USAR and changes to it are accordingly also subject to 10 CFR 50.59. The ITS Bases also contain descriptions of system design. ITS 5.5.12 specifies controls for changing the Bases. Removing details of system design is acceptable because the associated CTS requirements being retained without these details are adequate to ensure safe operation of the facility. In addition, retaining such details in TS is unnecessary to ensure proper control of changes. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR) in accordance with GL 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," dated October 3, 1988. ITS Section 5.6, “Reporting Requirements,” includes the programmatic requirements for the COLR. Therefore, it is acceptable to remove Type 1 details from the CTSs and place them in licensee-controlled documents.



Type 2 - Removing Descriptions of System Operation

The plans for normal and emergency operation of the facility are required to be described in the USAR by 10 CFR 50.34. ITS 5.4.1.a and 5.4.1.e will require written procedures to be established, implemented, and maintained for plant operating procedures recommended in Appendix A of Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, dated February 1978, and in all programs specified in ITS Section 5.5, respectfully. The ITS Bases also contain descriptions of system operation. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the USAR and TRM. ITS 5.5.12 specifies controls for changing the Bases. Removing details of system operation is acceptable because the associated CTS requirements being retained without these details are adequate to ensure safe operation of the facility. In addition, retaining such details in TS is unnecessary to ensure proper control of changes. Therefore, it is acceptable to remove Type 2 details from the CTSs and place them in licensee-controlled documents.

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

Details for performing TS SRs or for regulatory reporting are more appropriately specified in the plant procedures. Prescriptive procedural information in a TS requirement is unlikely to contain all procedural considerations necessary for the plant operators to comply with TSs and all regulatory reporting requirements, and referral to plant procedures is therefore required in any event. Changes to procedural details include those associated with limits retained in the ITSs. For example, Specification 5.4.1 requires that written procedures covering activities that include all programs specified in Specification 5.5 be established, implemented, and maintained. ITS 5.5.6, "Inservice Testing Program," requires a program to provide controls for inservice testing (IST) of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components. The program includes defining testing frequencies specified in the ASME Operation and Maintenance Standards and Codes (OM Codes), and applicable addenda. The CTSs also contain requirements to test specific components such as pumps and valves, and establish IST of Quality Group A, B, and C pumps and valves performed in accordance with the requirements for ASME Code Class 1, 2 and 3 components specified in the ASME OM Codes and addenda, subject to the applicable provisions of 10 CFR 50.55a. Therefore, it is acceptable to remove Type 3 details from the CTSs and place them in licensee-controlled documents.

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

Certain CTS requirements are for instruments and alarms that are not required for operability of the LCO-required equipment, and thus may be relocated to the USAR or other appropriate licensee-controlled documents. Changes to the facility or to procedures as described in the USAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QAPD, and ITS 5.5.12 governs changes to the ITS Bases. Therefore, it is acceptable to remove Type 4 details from CTSs and place them in licensee-controlled documents.



Type 5 - Removal of Cycle-Specific Parameter Limits from the TSs to the COLR

Certain CTS requirements contain cycle-specific parameter limits that are redundantly specified in the COLR, and thus, are relocated to the licensee-controlled COLR. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TSs. Changes are made to the COLR in accordance with the provisions of ITS 5.6.5. Therefore, it is acceptable to remove Type 5 details from CTSs and place them in licensee-controlled documents.

Type 6 - Removal of an LCO, a SR, or other TS Requirement to the TRM, USAR, Offsite Dose Calculation Manual (ODCM), QAPD, or Inservice Inspection (ISI) Plan

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

Table LA attached to this SE lists the less restrictive removal of detail changes being made in the MNGP ITS conversion. Table LA is organized in ISTS order by each LA-type DOC and includes the following:

1. The DOC identifiers, formatted as DOC Type (e.g., LA), followed by the Chapter/Section number (e.g., 3.4), followed by a designator number (e.g., 74);
2. A summary description of the relocated details and requirements;
3. The name of the licensee-controlled document to contain the relocated details and requirements (location);
4. The regulation (or ITS Specification) for controlling future changes to relocated requirements (change control process);
5. The reference numbers of the associated CTS requirements; and
6. A characterization of the type of change.

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



- Bases controlled in accordance with ITS 5.5.9, “Technical Specifications (TS) Bases Control Program.”
- USAR (which references the TRM) controlled by 10 CFR 50.59.
- Programmatic documents required by ITS Section 5.5 and controlled by ITS Section 5.4.
- ISI and IST Programs controlled by 10 CFR 50.55a.
- ODCM controlled by ITS 5.5.1.
- COLR controlled by ITS 5.6.3.
- Operational Quality Assurance Program (OQAP), as approved by the NRC, referenced in the USAR, and controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- Site Emergency Plan controlled by 10 CFR 50.54(q).

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

E. Relocated Specifications

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36(c)(2)(ii)) may be relocated from existing TSs (an NRC-controlled document) to appropriate licensee-controlled documents as noted in Section D above.

This section discusses the relocation of entire specifications from the CTSs to licensee-controlled documents. These specifications generally would include LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and supplements, the licensee proposed relocating such specifications from the CTSs to a licensee-controlled document such as the USAR, the TRM, or other document under regulatory control such as the COLR, ODCM, OQAP, IST program, and IIP. The NRC staff has reviewed the licensee's submittals and finds that relocation of these requirements is acceptable in that the LCOs and associated requirements were found not to fall within the scope of 10 CFR 50.36(c)(2)(ii) and changes to licensee-controlled documents will be adequately controlled by 10 CFR 50.59, as applicable. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R attached to this SE lists the relocated changes that would be made in the MNGP ITS conversion and lists all specifications that are being relocated from the CTSs to licensee-controlled documents. Table R includes the following in columns:



1. References to the ITS/CTS section and DOC number;
2. References to the relocated CTS requirement;
3. Summary descriptions of the relocated CTS requirement;
4. Names of the document that will contain the relocated specifications (i.e., the new location);
5. The methods for controlling future changes to the relocated specifications (i.e., the regulatory change control process); and
6. The type of change.

The NRC staff’s evaluation of each relocated specification listed in Table R is provided below. The new locations for the relocated CTSs are listed in Table R.

E.1 Reactor Protection System (RPS)

CTS 3/4.1.A and B; Table 3.1.1, Trip Function 9; Table 4.1.1 2.1, Instrument Channel 5; and, Table 4.1.2, Instrument Channel 7 (Turbine Condenser Low Vacuum) - DOC R.1

CTS 3.1.A requires the RPS Turbine Condenser Low Vacuum Trip Function (CTS Table 3.1.1, Trip Function 9) to be OPERABLE while CTS 4.1.A requires the RPS turbine condenser low vacuum trip function channels to be functionally tested and calibrated as indicated in Tables 4.1.1 and 4.1.2, respectively. The turbine condenser low vacuum scram is provided to protect the main condenser from overpressurization in the event that vacuum is lost. A loss of condenser vacuum would cause the turbine stop valves to close, resulting in a turbine trip transient. The low condenser vacuum trip anticipates this transient and scrams the reactor. No design basis accidents or transients take credit for this scram signal. This specification does not meet the criteria for retention in the ITSs and will be retained in the TRM.

This change is acceptable because the requirements of CTS 3.1.A and CTS 4.1.A, related to the turbine condenser low vacuum trip function do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- The turbine condenser low vacuum scram instrumentation is not an instrument used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a design basis accident (DBA). The turbine condenser low vacuum trip function does not satisfy Criterion 1.
- The turbine condenser low vacuum scram instrumentation is not a process variable that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The turbine condenser low vacuum trip function does not satisfy Criterion 2.
- The turbine condenser low vacuum scram instrumentation is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The turbine condenser low vacuum trip function does not satisfy Criterion 3.
- The loss of the turbine condenser low vacuum scram instrumentation is an insignificant risk contributor to core damage frequency (CDF) and offsite releases. The turbine condenser low vacuum trip function does not satisfy Criterion 4.



Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the turbine condenser low vacuum LCO, actions, and associated surveillances may be relocated out of the TSs. The turbine condenser low vacuum specification will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

E.2 <u>Control Rod Block Actuations</u>

CTS 3.2.C.1 and CTS Tables 3.2.3 and 4.2.1, in part, specify the limiting conditions of operation, associated Actions, and Surveillance Requirements for the Source Range Monitor (SRM), Intermediate Range Monitor (IRM), Average Power Range Monitor (APRM), and Scram Discharge Volume (SDV) Rod Block Functions.

The SRM, IRM, APRM, and SDV rod blocks are intended to prevent rod withdrawal when plant conditions make such withdrawal imprudent.

The licensee states that there are no safety analyses dependent on these rod blocks to prevent, mitigate, or establish initial conditions for a DBA or transient. The evaluation summarized in NEDO-31466 determined that the loss of SRM, IRM, APRM, and SDV rod blocks would be an insignificant risk contributor to CDF and offsite releases. These requirements do not meet the criteria for retention in the ITSs and will be retained in the TRM.

This change is acceptable because CTS 3.2.C.1 and CTS Tables 3.2.3 and 4.2.1, in part, for SRM, IRM, APRM, and SDV rod blocks, do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs, as discussed below.

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

- The SRM, IRM, APRM, and SDV rod blocks are not installed instrumentation used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The SRM, IRM, APRM, and SDV rod blocks do not satisfy Criterion 1.
- The SRM, IRM, APRM, and SDV rod block limits are not a process variable that is an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The SRM, IRM, APRM, and SDV rod blocks do not satisfy Criterion 2.
- The SRM, IRM, APRM, and SDV rod blocks limits are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The SRM, IRM, APRM, and SDV rod blocks do not satisfy Criterion 3.
- As discussed in Sections 3.5 and 6, and summarized in Table 4-1 (items 135, 137, 138 and 139) of NEDO-31466, the SRM, IRM, APRM, and SDV rod blocks are insignificant risk contributors to CDF and offsite releases. The SRM, IRM, APRM and SDV rod blocks do not satisfy Criterion 4.

NMC states that they have reviewed this evaluation, considers it applicable to the MNGP, and concurs with the assessment. Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the SRM, IRM, APRM, and SDV rod block LCOs and associated surveillances will be relocated out of the TSs and relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.



<u>CTS 3/4,2.C.1 Control Rod Block Actuation, Table 3.2.3, Function 1 (SRM) - DOC R.1</u>

SRM signals are used to monitor neutron flux during refueling, shutdown, and startup conditions. When IRMs are not above Range 2, the SRM control rod block functions to prevent a control rod withdrawal if the count rate exceeds a preset value or falls below a preset limit. No DBA or transient analysis takes credit for rod block signals initiated by the SRMs.

This change is acceptable because the SRM Control Rod Block in Table 3.2.3, Function 1, does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- The SRM control rod block instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.
- The SRM control rod block instrumentation is not used to monitor a process variable that is an initial condition of a DBA or transient analysis.
- The SRM control rod block instrumentation is not a part of a primary success path in the mitigation of a DBA or transient.
- The loss of the SRM control rod block function is an insignificant risk contributor to CDF and offsite releases.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the control rod block actuation LCO and surveillances applicable to SRM instrumentation may be relocated to other plant controlled documents outside the TSs. The SRM control rod block LCO and surveillances will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

CTS 3/4,2.C.1 Control Rod Block Actuation, Table 3.2.3, Function 2 (IRM) - DOC R.1

IRMs are provided to monitor the neutron flux levels during refueling, shutdown, and startup conditions. The IRM control rod block functions to prevent a control rod withdrawal if the IRM reading exceeds a preset value, or if the IRM is inoperable. No DBA or transient analysis takes credit for rod block signals initiated by the IRMs.

This change is acceptable because the IRM Control Rod Block in Table 3.2.3, Function 2, does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- The IRM control rod block instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.
- The IRM control rod block instrumentation is not used to monitor a process variable that is an initial condition of a DBA or transient analysis.
- The IRM control rod block instrumentation is not a part of a primary success path in the mitigation of a DBA or transient.
- The loss of the IRM control rod block function is an insignificant risk contributor to CDF and offsite releases.



Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the control rod block actuation LCO and surveillances applicable to IRM instrumentation may be relocated to other plant controlled documents outside the TSs. The IRM control rod block LCO and surveillances will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

CTS 3/4,2.C.1 Control Rod Block Actuation, Table 3.2.3, Function 3 (APRM) - DOC R.1

The APRM control rod block functions to prevent conditions that would require RPS action if allowed to proceed, such as during a control rod withdrawal error at power. The APRMs utilize local power range monitor (LPRM) signals to create the APRM rod block signal and provide information about the average core power. The rod block function is not used to mitigate a DBA or transient.

This change is acceptable because the APRM control rod blocks in Table 3.2.3, Function 2, do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- The APRM control rod block instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.
- The APRM control rod block instrumentation is not used to monitor a process variable that is an initial condition of a DBA or transient analysis.
- The APRM control rod block instrumentation is not a part of a primary success path in the mitigation of a DBA or transient.

- The loss of the APRM control rod block function is an insignificant risk contributor to CDF and offsite releases.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the control rod block actuation LCO and surveillances applicable to APRM instrumentation may be relocated to other plant controlled documents outside the TSs. The APRM control rod block LCO and surveillances will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

<u>CTS 3/4,2.C.1 Control Rod Block Actuation, Table 3.2.3, Function 5 (SDV) - DOC R.1</u>

The SDV control rod block functions to prevent control rod withdrawals, utilizing SDV signals to create the rod block signal if water is accumulating in the SDV. The purpose of measuring the SDV water level is to ensure that there is sufficient volume remaining to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal provides an indication to the operator that water is accumulating in the SDV and prevents further rod withdrawals. With continued water accumulation, a RPS-initiated scram signal will occur. Thus, the SDV water level rod block signal provides an opportunity for the operator to take action to avoid a subsequent scram. No DBA or transient takes credit for rod block signals initiated by the SDV instrumentation.

This change is acceptable because the SDV control rod blocks in Table 3.2.3, Function 5, do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:



- The SDV control rod block instrumentation is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.
- The SDV control rod block instrumentation is not used to monitor a process variable that is an initial condition of a DBA or transient analysis.
- The SDV control rod block instrumentation is not a part of a primary success path in the mitigation of a DBA or transient.
- The loss of the SDV control rod block function is an insignificant risk contributor to CDF and offsite releases.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the control rod block actuation LCO and surveillances applicable to SDV instrumentation may be relocated to other plant controlled documents outside the TSs. The SDV control rod block LCO and surveillances will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

E.3 <u>CTS 4.5.A.4, Automatic Depressurization System (ADS) Inhibit Switch - DOC R.1</u>

The ADS inhibit switch allows the operator to defeat ADS actuation as directed by the emergency operating procedures (EOP) under conditions for which ADS would not be desirable. For example, during an anticipated transient without scram (ATWS) event, low pressure emergency core cooling system (ECCS) system activation would dilute sodium pentaborate injected by the standby liquid control (SLC) system, thereby reducing the effectiveness of the

SLC system ability to shutdown the reactor.  CTS 4.5.A.4 requires the performance of an ADS inhibit switch operability test.

While 10 CFR 50.36(c)(2) criteria are not normally used for an individual SR, they are used in this case since the previous BWR STSs included the ADS manual inhibit switch as a separate specification and the NRC evaluated it as such as documented in the NRC Staff Review of NSSS [Nuclear Steam Supply System] Vendor Owners Groups application of the Commissions Interim Policy Criteria to STSs, letter dated May 9, 1988.  This SR does not meet the criteria for retention in the ITSs; therefore, it will be retained in the TRM

This change is acceptable because the ADS inhibit switch surveillance in CTS 4.5.A.5 does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs.  The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- The ADS inhibit switch is not an instrument used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.  ADS inhibit switch operability is not required to satisfy Criterion 1.
- The ADS inhibit switch is not used for, nor capable of, monitoring a process variable that is an initial condition of a DBA or transient analysis.  ADS inhibit switch operability is not required to satisfy Criterion 2.
- The ADS inhibit switch is not used as part of a primary success path in the mitigation of a DBA or transient.  The inhibit feature was added to allow defeating the automatic ADS function when such action is required by the EOPs.  Manual operator action is not credited in a DBA or transient analysis.  ADS inhibit switch operability is not required to satisfy Criterion 3.
- The loss of the ADS inhibit switch is an insignificant risk contributor to CDF and offsite releases.  ADS inhibit switch operability is not required to satisfy Criterion 4.



Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the ADS inhibit switch operability test may be relocated to other plant controlled documents outside the TSs.  The ADS inhibit switch LCO and surveillances will be relocated to the TRM.  Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

E.4  <u>CTS 3/4.6.C.2, 3/4.6.C.3 and 3/4.6.C.4, Reactor Coolant Water Chemistry - DOC R.1</u>

Poor coolant water chemistry contributes to the long term degradation of system materials of construction, and thus is not of immediate importance to the operator.  Reactor coolant water chemistry is monitored for a variety of reasons, one of those to reduce the possibility of failures in the reactor coolant system pressure boundary caused by corrosion.  The chemistry monitoring activity is of a long term preventative purpose rather than mitigative.  CTS 3/4.6.C.2 and 3/4.6.C.3 specifies required limits for reactor coolant water chemistry parameters during plant operations, and 3/4.6.C.4 provides the Actions if these parameters are not met.

This change is acceptable because the reactor coolant water chemistry LCO and surveillances described in CTS 3/4.6.C.2 and 3/4.6.C.3 do not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs.  The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- Reactor coolant water chemistry is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. Reactor coolant water chemistry is not required to satisfy Criterion 1.
- Reactor coolant water chemistry is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. Reactor coolant water chemistry is not required to satisfy Criterion 2.
- Reactor coolant water chemistry is not part of a primary success path in the mitigation of a DBA or transient. Reactor coolant water chemistry is not required to satisfy Criterion 3.
- Reactor coolant water chemistry was found to be an insignificant risk contributor to CDF and offsite releases. Reactor coolant water chemistry is not required to satisfy Criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the reactor coolant water chemistry specifications may be relocated to other plant controlled documents outside the TSs. The reactor coolant water chemistry LCO and surveillances will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

E.5 <u>CTS Tables 3.14.1 and 4.14.1, Accident Monitoring Instrumentation - DOC R.1</u>

CTS Tables 3.14.1 and 4.14.1 provide requirements for post-accident monitoring (PAM) instrumentation channels. Each individual PAM parameter has a specific purpose; however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant.



The NRC position on application of the deterministic screening criteria to PAM instrumentation is documented in letter dated May 9, 1988 from T.E. Murley (NRC) to W.S. Wilgus (NRC Split Report to Owners Groups). The position taken was that the PAM instrumentation table list should contain, on a plant specific basis, all RG 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on RG 1.97, and all RG 1.97 Category 1 instruments. Accordingly, this position has been applied to the Monticello RG 1.97 instruments.

Those instruments meeting these criteria will remain in TSs. The instruments not meeting this criteria will be relocated from the CTSs to plant controlled documents. The following summarizes NMC's position for those instruments to be retained in the MNGP TSs:

<u>Type A Variables</u>

1. Reactor Vessel Fuel Zone Water Level
2. Suppression Pool Temperature

<u>Other Type, Category 1 Variables</u>

1. Drywell Wide Range Pressure
2. Suppression Pool Wide Range Level
3. Drywell High Range Radiation

The accident monitoring instrumentation listed above will be retained in the ITSs and incorporated in ITS Sections 3.3.3.1 and 3.3.6.3.

A review of the MNGP USAR and the NRC RG 1.97 SE shows that the following instruments listed in Tables 3.14.1 and 4.14.1 instruments do not meet Category 1 or Type A requirements, and may be relocated out of TSs:

| | |
|---|---|
| Function 2 | Safety/Relief Valve Position |
| Function 7 | Offgas Stack Wide Range Radiation |
| Function 8 | Reactor Building Vent Wide Range Radiation |

This change is acceptable because the instrumentation does not meet the 10 CFR 50.36(c)(2)(ii) criteria for inclusion into the ITSs. The 10 CFR 50.36(c)(2)(ii) Criteria Evaluation is as follows:

- These instruments are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. These instruments do not meet Criterion 1.
- The monitored parameters are not process variables, design features, or operating restrictions that are initial conditions of a DBA or transient. These instruments do not meet Criterion 2.
- These instruments are not part of a primary success path in the mitigation of a DBA or transient. These instruments do not meet Criterion 3.
- These instruments are not structures, systems, or components which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. These instruments do not meet Criterion 4.



Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met for instruments which do not meet RG 1.97 Type A variable requirements or non-Type A, Category 1 variable requirements, the associated LCO and surveillances may be relocated out of the TSs. The TS requirements for these instruments will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.

Summary Conclusion

The specifications relocated from the CTSs discussed above are not required to be in the TSs because they do not fall within the criteria for mandatory inclusion in the TSs as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. The NRC staff concludes that appropriate controls have been established for all of the current specifications and information being moved to the TRM. These relocations are the subject of a new license condition discussed in Section 7.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents.

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

In the ITS conversion, the licensee proposes to relocate specifications, requirements, and detailed information from the CTSs to licensee-controlled documents. This is discussed in Sections 4.D and 4.E of this SE. The facility and procedures described in the USAR and TRM can be revised in accordance with the provisions of 10 CFR 50.59, to ensure that records are maintained and appropriate controls are established over those requirements removed from the CTSs and future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. For example, the ODCM can be changed only in accordance with ITS 5.5.1, and the administrative instructions that implement the OQAP can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the OQAP and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTSs, which is discussed in Section 7.0 of this SE, will address the implementation of the ITS conversion and the schedule for the relocation of the CTS requirements into licensee-controlled documents.

G. Evaluation of Beyond-Scope Changes

This section evaluates TS changes identified as beyond scope changes provided in Enclosure 2 to the ITS conversion application. Beyond scope changes are those changes included in the ITS conversion submittal that are beyond the scope of the ISTSs as described in NUREG-1433, Revision 3, and also beyond the scope of the MNGP CTSs.



These beyond scope issues (BSIs) were either identified by the your staff and provided in the application, or later identified by NRC staff during the course of the review. The BSIs were included in the Notice of Consideration of Issuance of Amendment to Facility Operating License and Opportunity for Hearing published in the *Federal Register* on November 16, 2005 (70 FR 70889).

This section of the SE is divided into BSIs identified by your staff (Section G.1) and those identified by the NRC staff (Section G.2).

The following is a list of the discussions of changes (DOCs) in Attachment 1 that are Beyond Scope Changes in the MNGP ITS conversion submittal.

G.1 Licensee-Identified BSI Changes

G.1.1 Allowable Value Changes from Application of Current Setpoint Methodology

G.1.1.a ITS 3.3.1.1, DOC L.12

CTS 3.1.A refers to the "setpoints" of the RPS [Reactor Protection System] Instrumentation Functions in CTS Table 3.1.1 and CTS Table 3.1.1 specifies the "Limiting Trip Settings" for the RPS Instrumentation Functions. The Limiting Trip Setting of CTS Table 3.1.1 Trip Functions 3.a, 4.a, and 4.c have been modified to reflect new less restrictive AVss as indicated for ITS

Table 3.3.1.1-1, Functions 1.a and 2.a. The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of the AVs is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.1.1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. These AVs have been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AVs are derived from the analytic limits. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the nominal trip setpoint (NTSP) allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER [licensee event report] Avoidance Test, calculates the probability of avoiding an LER (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable. This change is less restrictive because less stringent AVs are being applied in the ITSs than were applied in the CTSs.



NRC Staff Evaluation:

The Functions under BSI 1.a have been determined to be consistent with the current licensing basis and no longer BSIs. This section will be incorporated into Table L.

G.1.1.b <u>ITS 3.3.4.1, DOC L.4</u>

CTS Table 3.2.5 specifies the "Trip Setting" for the ATWS-RPT [Anticipated Transient Without Scram - Recirc Pump Trip] High Reactor Dome Pressure Function. The Trip Setting of CTS Table 3.2.5, Function 1, has been modified to reflect the new less restrictive AV as indicated in ITS SR 3.3.4.1.5.b. This changes the CTSs by requiring the ATWS-RPT instrumentation to be set consistent with the new "Allowable Value." The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of the AV is to ensure the instruments function as assumed in the safety analyses. ITS SR 3.3.4.1.5.b reflects an AV consistent with the philosophy of GE ISTSs, NUREG-1433. This AV has been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AV is derived from the analytic limits. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER Avoidance Test, calculates the probability of avoiding a Licensee Event Report (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable. This change is designated as less restrictive because the less stringent AVs are being applied in the ITSs than were applied in the CTSs.

NRC Staff Evaluation:

The Functions under BSI 1.b have been determined to be consistent with the current licensing basis and no longer BSIs. This section will be incorporated into Table L.

G.1.1.c ITS 3.3.5.1, DOC M.8

CTS Table 3.2.2 specifies the "Trip Setting" for the ECCS [Emergency Core Cooling System] Instrumentation Functions. The Trip Settings of CTS Table 3.2.2, Function C.3, has been modified to reflect new more restrictive AVs as indicated for ITS Table 3.3.5.1-1, Functions 4.c, 4.d, 5.c, and 5.d. This changes the CTSs by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value." The information that follows was provided by your staff to justify the acceptability of this BSI change.



The purpose of the AV is to ensure the instruments function as assumed in the safety analyses. ITS Table 3.3.5.1-1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. These AVs have established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AVs are derived from the analytic limit. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER Avoidance Test, calculates the probability of avoiding a Licensee Event Report (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable. This change is designated as more restrictive because more stringent AVs are being applied in the ITSs than were applied in the CTSs.

NRC Staff Evaluation:

G.1.1.d  ITS 3.3.5.1, DOC L.5

CTS Table 3.2.2 and Table 3.2.8 specify the "Trip Setting" for the ECCS instrumentation Functions.  The Trip Settings of CTS Table 3.2.2, Functions A.1.b.i and A.2, and Table 3.2.8, Function C.1 have been modified to reflect new less restrictive AVs as indicated for ITS Table 3.3.5.1-1, Functions 1.c, 1.d, 2.c, 2.d, and 3.d.  In addition, the AV for ITS Table 3.3.5.1-1, Function 3.d, only specifies a single AV, which is applicable for both one tank and two tank operations.  This changes the CTSs by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value."  The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of the AV is to ensure the instruments function as assumed in the safety analyses. ITS Table 3.3.5.1-1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. This AV has been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology.  The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis.  The AVs are derived from the analytic limit.  The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period.  Two separate verifications are performed for the calculated NTSP.  The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability.  The second verification, an LER Avoidance Test, calculates the probability of avoiding a Licensee Event Report (or exceeding the AV) due to instrument drift.  These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events.  Furthermore, the AV for ITS Table 3.3.5.1-1, Function 3.d is acceptable for both one tank and two tank operation.  Therefore, based on the above discussion, the changes to the AVs are acceptable.  This change is less restrictive because the less stringent AVs are being applied in the ITSs than were applied in the CTSs.



NRC Staff Evaluation:

G.1.1.e  ITS 3.3.5.2, DOC L.3

CTS Table 3.2.8 specifies the "Trip Setting" for the Condensate Storage Tank Level - Low for two tank and one tank operations.  The Trip Settings of CTS Table 3.2.8, Function C.1, have been modified to reflect a new less restrictive AV as indicated for ITS Table 3.3.5.2-1, Function 3.  In addition, the AV for this Function only specifies a single AV, which is applicable for both one tank and two tank operations.  This changes the CTSs by requiring the RCIC instrumentation to be set consistent with the new "Allowable Value."  The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of CTS Table 3.2.8, Function C.1, is to ensure the Condensate Storage Tank Level - Low channels function as assumed in the plant analysis.  The proposed AV is acceptable for both one and two tank operations.  ITS Table 3.3.5.1-1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. This AV has been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AVs are derived from the analytic limit. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER Avoidance Test, calculates the probability of avoiding a Licensee Event Report (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable. This change is less restrictive because the less stringent AVs are being applied in the ITSs than were applied in the CTSs.

NRC Staff Evaluation:

G.1.1.f ITS 3.3.6.1, DOC M.9



CTS Table 3.2.1 specifies the "Trip Settings" for the primary containment isolation instrumentation. The "Trip Settings" of CTS Table 3.2.1, Functions 3.d, 4.a, 4.b, 4.c, and 5.b, have been modified to reflect new more restrictive AVs as indicated in ITS Table 3.3.6.1-1, Functions 3.a, 3.b, 3.c, 4.c, and 5.a. This changes the CTSs by requiring the Primary Containment Isolation Functions to be set consistent with the new "Allowable Value." The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of the AVs is to ensure the instruments function as assumed in the safety analyses. ITS Table 3.3.6.1-1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. These AVs have been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AVs are derived from the analytic limit. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER Avoidance Test, calculates the probability of avoiding a Licensee Event Report (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable.

This change is designated as more restrictive because more stringent AVs are being applied in the ITSs than were applied in the CTSs.

NRC Staff Evaluation:

G.1.1.g ITS 3.3.6.1, DOC L.9

CTS Table 3.2.1 specifies the "Trip Settings" for the primary containment isolation instrumentation. The "Trip Settings" of CTS Table 3.2.1, Functions 1.b, 1.d, 5.a, 5.c, and 6.a, have been modified to reflect new less restrictive AVs as indicated in ITS Table 3.3.6.1-1, Functions 1.b, 1.c, 4.a, 4.b, and 6.a. This changes the CTSs by requiring the primary containment isolation instrumentation Functions to be set consistent with the new "Allowable Value." The information that follows was provided by your staff to justify the acceptability of this BSI change.

The purpose of the AVs is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.6.1 reflects AVs consistent with the philosophy of GE ISTSs, NUREG-1433. These AVs have been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AVs are derived from the analytic limits. The difference between the analytic limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER [licensee event report] Avoidance Test, calculates the probability of avoiding a LER (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the analytic limit for the applicable events. Therefore, based on the above discussion, the changes to the AVs are acceptable. This change is designated as less restrictive because the less stringent AVs are being applied in the ITSs than were applied in the CTSs.



NRC Staff Evaluation:

BSI 1.g includes Functions identified as within the current licensing basis. CTS Table 3.2.1, Functions 1.b, 1.d, and 5.c are consistent with the current licensing basis and no longer BSIs. Those functions will be incorporated into Table L. CTS Table 3.2.1, Functions 5.a and 6.a, are not consistent with the current licensing basis and remain BSIs. These functions will be evaluated under Section G.1.1.g.

G.1.1.h ITS 3.3.8.1, DOC M.3

CTS Table 3.2.6 specifies the "Trip Setting" for the LOP Instrumentation. The Trip Settings of CTS Table 3.2.6, Function 1, have been modified to reflect new more restrictive AVs as indicated for ITS Table 3.3.8.1-1, Functions 2.a and 2.b.

Instead of a trip setting, the AV is used consistent with ISTSs. The AV provides limits (due to setting tolerance, drift, measuring instrument errors etc.) on a nominal tripping setting.

Loss of Voltage Function

The AV of loss of voltage (Function 1) in ITS Table 3.3.8.1-1 is ≥2345V and ≤2905V. The allowable limits correspond to a trip setting of 2625 ± 280V (63.1 ± 6.7% based on bus voltage of 4160V). There is no time delay associated with Loss of Voltage Function (same as in the CTSs).

In the CTS Table 3.2.6, presently the trip setting is 2625 ± 175V (63.1 ± 4.2%). There is no difference with respect to nominal trip setting (2625V) between the CTSs and the proposed ITSs. The only difference is with respect to ± limits. In response to NRC staff questions for calculations necessary to justify the change in the ± limits of setting values (from 2625 ± 175V to 2625 ± 280V), your staff provided the following response (ADAMS Accession No. ML060230436):

> ".....the change in the Allowable Value is consistent with the Technical Specifications Change Request submitted to the NRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to NRC, dated June 30, 2004. This change has subsequently been approved by the NRC as part of Monticello License Amendment 143, dated September 30, 2005. Therefore, since the Loss of Voltage Allowable Value change has already been approved by the NRC, it is not part of the Monticello ITS conversion and should not be considered a beyond scope issue. Thus, no drift calculations are being provided."



Degraded Voltage Function

The AV of degraded voltage (Function 2) in ITS Table 3.3.8.1-1 is ≥3909V and ≤3921V, with a time decay of ≥8.8 seconds and ≤9.2 seconds. These values correspond to a trip setting of 3915 ± 6V (94.11 ± 0.14% based on bus voltage of 4160V) with a time decay of 9.0 ± 0.2 seconds.

In the CTSs, the trip setting is 3915 ± 18V (94.11 ± 0.43%) with a time decay of 9.0 ±1.0 second. There is no difference with respect to nominal trip setting (3915V) between the CTSs and the proposed ITSs. The only difference is the stringent tolerances (reduced ± limits) proposed in the ITSs compared to those in the CTSs. In response to NRC staff questions for calculations to justify the change in the ± limits of nominal setting (from ± 18V to ± 6V for voltage setting, and from ± 1.0 second to ± 0.2 second), the your staff provided applicable portions of the Instrument Setpoint Calculation 4.16 KV Degraded Voltage (CA-92-220), Rev. 1, which also included the drift/±tolerance analysis (ADAMS Accession No. ML060230436).

NRC Staff Evaluation:

The NRC staff reviewed the explanation provided by your staff to the Loss of Voltage Function, and the AV in ITS Table 3.3.8.1-1 is considered acceptable.

The NRC staff reviewed the explanation provided by your staff to the change in ± limits of the nominal trip setting for the Degraded Voltage Protection being more stringent, which included a review of the applicable portions of the Instrument Setpoint Calculation. The information and explanation provided by your staff is considered acceptable.

Evaluation from Instrumentation and Controls Branch

G.1.2 ITS 3.3.1.1, DOC L.14

CTS Table 4.1.1 requires a weekly functional test of the Manual Scram Function. ITS Table 3.3.1.1-1, Function 11, and ITS SR 3.3.1.1.5 requires the performance of the same test at a 31-day Frequency. This changes the CTSs by extending the Manual Scram functional test Frequency from 7 days to 31 days.

NRC Staff Evaluation

G.1.3 ITS 3.3.2.1, DOC L.5

CTS 3.2.C.2.b states that the Rod Block Monitor (RBM) bypass time delay must be less than or equal to 2.0 seconds. ITS 3.3.2.1 does not require the RBM bypass time delay to be OPERABLE. This changes the CTSs by deleting the RBM bypass time delay requirements.

NRC Staff Evaluation



G.1.4 ITS 3.3.3.1, DOC L.2

CTS 4.14 does not provide a delayed entry into associated Conditions and Required Actions if a PAM channel is inoperable solely for performance of required Surveillances. ITS Surveillance Requirements Note 2 has been added to allow delayed entry into associated Conditions and Required Actions for up to 6 hours if a PAM channel is placed in an inoperable status solely for performance of required Surveillances provided the associated Function maintains capability. This changes the CTSs by providing a delay time to enter Conditions and Required Actions for a PAM channel placed in an inoperable status solely for performance of required Surveillances.

NRC Staff Evaluation

G.1.5 ITS 3.3.8.2, DOC M.3

CTS 4.1.C.2 requires an instrument calibration of each RPS power monitoring channel every "Operating Cycle." ITS SR 3.3.8.2.2 requires the performance of a CHANNEL CALIBRATION of the overvoltage, undervoltage, and underfrequency setpoints every 184 days. This changes the CTSs by increasing the frequency of performing a CHANNEL CALIBRATION of the overvoltage, undervoltage, and underfrequency setpoints.

NRC Staff Evaluation

G.1.6 ITS 3.4.1, DOC M.1

CTS 3.5.F.1 does not allow operation in the Exclusion Region of the power to flow map and CTS 3.5.F.2 allows entry into the Stability Buffer Region of the power to flow map as long as the power distribution controls are in effect. CTS 4.5.F.1 provides a cross reference to the

Surveillance Requirements in CTS 4.6.G. These surveillances, however, are jet pump surveillances and do not address stability monitoring issues.

The purpose of SR 3.4.1.2 is to periodically ensure the unit is operating in an allowed region of the power-to-flow map by verifying every 24 hours that plant operation is either in the Normal Region of the power-to-flow map, or that operation is in the Stability Buffer Region of the power-to-flow map with power distribution controls as specified in the COLR. This changes the CTSs by deleting the cross references to the SRs in CTS 4.6.G and adds a new SR, providing additional assurance that these requirements are met.

NRC Staff Evaluation

The stability monitoring system is designed to meet the requirements specified in Criterion 10, 12, and 13 of 10 CFR 50 Appendix A. The regulatory requirements that the NRC staff considered in its review are 10 CFR 50.36, “Technical Specifications,” which states that the TSs include SRs to assure limiting conditions for operation are met. The proposal for ITSs to incorporate the stability monitoring system surveillance meets these requirements.

NRC staff reviewed the proposed change and concludes that adding ITS SR 3.4.1.2 and to form ITS LCO 3.4.1 by modifying or inserting statements in CTS 3.4.1 are acceptable because: 1) the proposed change corrects the CTSs, which do not cover stability monitoring issues; 2) an allowed region of the power-to-flow map is determined by NRC-approved methodologies; and 3) the stability monitoring system, SIMULATE-3K (S3K), automatically performs a three-dimensional time domain calculation of reactor neutronic and therma-hydraulic response to determine both global and regional stability decay ratios for the licensed operator to evaluate whether reactor operation is within the allowed area of the Monticello stability decay ratio map .



The staff identified that the Power Distribution Controls definition as specified in the MNGP COLR (ADAMS Accession No. ML052760174), Section 9.0, will require additional clarification. Specifically, the COLR references the stability criteria of Figure 7, but does not provide a methodology for deriving and maintaining these power distibution controls. This issue does not require immediate resolution, nor does it affect the evaluation and conclusions of the proposed change. The NRC staff considers the proposed addition of ITS SR 3.4.1.2 to be acceptable.

G.1.7 ITS 5.5, DOC L.4

CTS 6.8.B includes the Primary Coolant Sources Outside Containment program requirements. The combustible gas control system (CGCS) is included in this program. ITS 5.5.2 includes the same program requirements for the Primary Coolant Sources Outside Containment Program, except the CGCS is excluded. This changes the CTSs by deleting the program requirement for the CGCS in the Primary Coolant Sources Outside Containment Program.

NMC provided the following justification for the proposed change:

> The operability requirements for the CGCS have been removed from the MNGP Technical Specifications as documented in License Amendment 138, dated May 21, 2004 (ADAMS Accession No. ML041180612). Amendment 138, however, did not remove the CGCS from the program requirements of CTS 6.8.B at that time since the Residual Heat Removal (RHR) System cooling water supply was still available to the

> CGCS (i.e., the potential for coolant leakage that could be highly radioactive during a transient or accident still existed). The licensee stated that a plant modification has been completed which removes all communication between the CGCS and the containment, and also eliminated the RHR system cooling water supply lines to the CGCS.

NRC staff agreed that Amendment 138 eliminated requirements for the Hydrogen Recombiners and relocated the requirements for hydrogen and oxygen monitors to a Commitment Tracking Program. Although the hydrogen recombiners are part of the CGCS, the aforementioned amendment did not specifically eliminate the CGCS as stated in your application. NRC staff requested additional information and discussed this issue with your staff during a conference call on November 2, 2005, to further clarify and confirm that the CGCS, in its entirety and including the ancillary RHR system cooling water supply, no longer communicated with containment.

NMC responded on November 3, 2005, and provided the following information:

> A plant modification was documented under licensee Modification Procedure 03Q145. The piping modifications were performed during refueling outage RF022. The CGCS inlet and return line piping was cut and capped on the containment side of the Containment Atmosphere Monitoring System sample connection points. The RHR system cooling water supply lines were cut on the CGCS side of valves CGC-1-1 and CGC-1-2. A high point vent connection was added to the RHR system downstream of CGC-1-1 and CGC-1-2, and two vent valves were added with the vent connection capped.



NRC Staff Evaluation

The plant modification eliminates any communication between primary containment and the CGCS, including the RHR system cooling water supply. Therefore, the potential for the CGCS to contain highly radioactive fluid no longer exists. The program controls for this system in CTS 6.8.B are no longer required. Therefore, eliminating the CGCS from ITS Section 5.5 program controls for Primary Coolant Sources Outside Containment is acceptable.

G.1.8 <u>ITS 5.5, DOC L.5</u>

CTS 6.8.B.2 specifies that the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident must be performed at a refueling cycle interval or less. CTS 6.8.B also states that CTS 4.0.B is applicable (i.e., a 25% grace period is allowed). ITS 5.5.2.b specifies that the same test must be performed at least once per 24 months and ITS 5.5.2 states that the provisions of ITS SR 3.0.2 are applicable. This changes the CTSs by extending the surveillance frequency from 18 months (i.e., the current MNGP frequency for this test, based on the previous refueling outage interval) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in ITS SR 3.0.2).

NMC provided the following justifications for the proposed change in the application:

> This change was evaluated in accordance with the guidance provided in NRC Generic Letter (GL) No. 91-04, “Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle,” dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their surveillance at the current frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended surveillance frequency will be minimal.
>
> Further justification for test interval extension is based upon most of the systems included in this program being visually walked down by either plant operators or system engineers during normal plant operation and/or testing. Routine housekeeping and safety walkdowns also serve to detect gross leakage. Leakage observed from these systems will be documented and repaired through the licensee’s corrective action program.
>
> Plant radiological surveys will identify any potential sources of leakage. Visual walkdowns and surveys provide system monitoring at frequencies greater than once per refueling cycle, and supports the conclusion that the impact, if any, on safety is minimal as a result of the proposed change.
>
> Based on inherent system and component reliability, and the testing performed during the operating cycle, any impact from this change is minimal. A review of historical surveillance data also demonstrates that there are no failures that would invalidate this conclusion. In addition, the proposed 24-month surveillance frequency, if performed at the maximum interval (30 months) allowed by ITS SR 3.0.2 does not invalidate any assumptions in the plant licensing basis.



NRC Staff Evaluation

NMC proposed increasing the integrated leak rate testing surveillance frequency on systems which interface with primary containment from the CTS 6.8.B.2 requirement of every refueling cycle or less (i.e., every 18 months) to 24 months, for a maximum interval of 30 months including the 25 percent grace period. This surveillance testing ensures that leakage outside primary containment from systems that could contain highly radioactive fluid during a serious transient or accident is a low as practicable.

Guidance provided in GL 91-04 states that licensees should evaluate the effect on safety on an increase in surveillance frequency to accommodate a 24-month fuel cycle. The evaluation should support a conclusion that the effect on safety is small. Licensees should confirm that historical plant maintenance and surveillance data support this conclusion. The licensee states that these components have normally passed this surveillance when performed at the current 18-month interval, and that there are no identified failures that would invalidate this conclusion. In addition, these systems are routinely inspected during normal operations and/or testing, such that any system degradation should be apparent and corrective actions implemented.

The NRC staff concludes that the proposed change does not have a significant effect on safety and follows the guidance of GL 91-04. Therefore, the proposed change to extend the surveillance interval for ITS Section 5.5.2.b to 24 months, including a 25 percent grace period, is acceptable.

G.1.9 ITS 3.3.2.1, DOC L.6

CTS Table 3.2.3 specifies the "Trip Settings" for the RBM instrumentation. The trip setting of CTS Table 3.2.3, Function 4.b, RBM Downscale, has been modified to reflect a new AV as indicated in ITS Table 3.3.2.1-1, Function 1.e. This changes the CTS by requiring the RBM downscale instrumentation to be set consistent with the new "Allowable Value."

The purpose of the AVs is to ensure the instruments function as assumed in the safety analyses. ITS 3.3.2.1 reflects AVs consistent with the philosophy of GE ISTS, NUREG-1433. These AVs have been established using the GE setpoint methodology guidance, as specified in the Monticello setpoint methodology. The analytic limits are derived from limiting values of the process parameters obtained from the safety analysis. The AV is derived from the design limit. The difference between the design limit and the AV allows for channel instrument accuracy, calibration accuracy, process measurement accuracy, and primary element accuracy. The margin between the AV and the nominal trip setpoint NTSP allows for instrument drift that might occur during the established surveillance period. Two separate verifications are performed for the calculated NTSP. The first, a Spurious Trip Avoidance Test, evaluates the impact of the NTSP on plant availability. The second verification, an LER Avoidance Test, calculates the probability of avoiding a LER (or exceeding the AV) due to instrument drift. These two verifications are statistical evaluations to provide additional assurance of the acceptability of the NTSP and may require changes to the NTSP. Use of these methods and verifications provides the assurance that if the setpoint is found conservative to the AV during surveillance testing, the instrumentation would have provided the required trip function by the time the process reached the design limit for the applicable events.

Based on the above discussion, the changes to the AVs are acceptable. This change is less restrictive because less stringent AVs are being applied in the ITS than were applied in the CTS.

NRC Staff Evaluation

BSI 9 has been determined to be consistent with the current licensing basis and no longer a BSI. This section will be incorporated into Table L.

G.2 Additional BSI Changes Identified by the NRC Staff

No additional BSI changes were identified by the NRC staff.

5.0 RELOCATED LICENSE CONDITIONS

No license conditions in the MNGP CTSs will be relocated or deleted.

6.0 COMMITMENTS RELIED UPON

In reviewing the proposed MNGP ITS conversion, the NRC staff relied upon the licensee to relocate certain requirements from the CTSs to licensee-controlled documents as described in

Table LA, “Removed Details” (Attachment 5 to this SE) and Table R, “Relocated Specifications” (Attachment 6 to this SE). These tables, and Section 5.0 of this SE, as applicable, reflect the relocations described in the licensee’s conversion submittal. The NRC staff requested and the licensee submitted a set of license conditions to make these commitments enforceable (see Section 7.0 of this SE). Such commitments from the licensee are important to the ITS conversion because the acceptability of removing or relocating certain requirements from the TSs is based on those requirements being relocated to licensee-controlled documents where further changes will be controlled by applicable regulations or other requirements (e.g., 10 CFR 50.59).

## 7.0 LICENSE CONDITIONS

In its letter dated April XX, 2006, the licensee agreed to license conditions which describe 1) the relocation of certain CTS requirements and license conditions, as applicable, to other license-controlled documents prior to ITS implementation, and 2) a schedule to begin performing new and revised SRs after ITS implementation. The following license conditions are included in the Facility Operating Licenses:

1. This amendment authorizes the relocation of certain technical specification and operating license conditions, as applicable, to other licensee-controlled documents. Implementation of License Amendment No. XXX shall include relocation of these requirements to the specified documents, as described in (1) Table LA of Removed Details and Table R of Relocated Specifications attached to the NRC staff's SE, as discussed in Sections D and E of the SE, and (2) Section 5.0 of the NRC staff's SE, as applicable.



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

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

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

   For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

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

The NRC staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule. The licensee stated that their implementation date for the new ITSs is no later than June 30, 2006. This implementation date is acceptable.

Because the commitments discussed in Section 6.0 of this SE are being relied upon for the amendment, a license conditions are included in the amendment that will enforce the relocation of requirements from the CTSs to licensee-controlled documents. The relocations are described in Table LA and Table R, which are Attachments 5 and 6 to this SE. The license condition states that the relocations would be completed no later than June 30, 2006, from the date of this amendment. This schedule to implement the amendment is acceptable.

## 8.0 STATE CONSULTATION

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

## 9.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on April xx, 2006 (xx FR xxxxx), for the proposed conversion of the CTSs to ITSs for the MNGP. Accordingly, the Commission has determined that issuance of this amendment will not result in any significant environmental impacts other than those evaluated in the Final Environmental Statement. The Commission also issued a Notice of Consideration of Issuance of Amendment to Facility Operating Licenses and Opportunity for a Hearing on November 23, 2005 (70 FR 70889).

## 10.0 CONCLUSION



The MNGP ITSs provide clearer, more readily understandable requirements to ensure safer operation of the unit. Based on the considerations discussed above, the NRC staff concludes that the MNGP ITSs satisfy the Commission's Final Policy Statement and 10 CFR 50.36. Based on these conclusions, the NRC staff further concludes that the proposed ITSs for the MNGP, as documented in the licensee's application and supplemental letters, including relocating the license conditions discussed in Section 5.0 of this SE, is acceptable.

The Commission has also concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the

Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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

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| | |
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ATTACHMENT 1

List of Acronyms and Abbreviations

# LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| ADAMS | Agencywide Documents Access and Management System |
| ADS | Automatic Depressurization System |
| APRM | Average Power Range Monitor |
| ASME | American Society of Mechanical Engineers |
| ATWS-RPT | Anticipated Transient Without Scram - Recirculation Pump Trip |
| AV | Allowable Value |
| BSI | Beyond-Scope Issue |
| BWR | Boiling Water Reactor |
| CDF | Core Damage Frequency |
| CFR | Code of Federal Regulations |
| CGCS | Combustible Gas Control System |
| COLR | Core Operating Limits Report |
| CREF | Control Room Emergency Filtration |
| CREV | Control Room Emergency Ventilation |
| CST | Condensate Storage Tank |
| CTS | Current Technical Specification |
| DBA | Design-Basis Accident |
| DOC | Discussion of Change (from the CTS) |
| ECCS | Emergency Core Cooling System |
| EDG | Emergency Diesel Generator |
| EDG-SW | Emergency Diesel Generator - Service Water |
| EOP | Emergency Operating Procedure |
| EPRI | Electric Power Research Institute |
| ESW | Emergency Service Water |
| FR | Federal Register |
| FSAR | Final Safety Analysis Report |
| GDC | General Design Criterion (of Appendix A to 10 CFR Part 50) |
| GE | General Electric |
| GL | Generic Letter |
| IIP | Inservice Inspection Program |
| IRM | Intermediate Range Monitor |
| ISI | Inservice Inspection |
| IST | Inservice Testing |
| ISTS | Improved Standard Technical Specifications, NUREG-1433, Revision 3 |
| ITS | Improved Technical Specification |
| JFD | Justification for Deviation |
| LCO | Limiting Condition for Operation |
| LER | Licensee Event Report |
| LLS | Low-Low Set (Safety Relief Valves) |
| LOCA | Loss-of-Coolant Accident |
| LPRM | Local Power Range Monitor |

| | |
|---|---|
| MNGP | Monticello Nuclear Generating Plant |
| MSIV | Main Steam Isolation Valve |
| NMC | Nuclear Management Company |
| NRC | Nuclear Regulatory Commission |
| NSSS | Nuclear Steam Supply System |
| NTSP | Nominal Trip Setpoint |
| ODCM | Offsite Dose Calculation Manual |
| OPDRV | Operations with the Potential for Draining the Reactor Vessel |
| OQAP | Operational Quality Assurance Program |
| PAM | Post-Accident Monitoring |
| PCIV | Primary Containment Isolation Valve |
| PRA | Probabilistic Risk Assessment |
| QA | Quality Assurance |
| QAPD | Quality Assurance Program Description |
| RAI | Request for Additional Information |
| RCS | Reactor Coolant System |
| RG | Regulatory Guide |
| RHR | Residual Heat Removal |
| RHRSW | Residual Heat Removal Service Water |
| RPS | Reactor Protection System |
| RPV | Reactor Pressure Vessel |
| RTP | Rated Thermal Power |
| RWCU | Reactor Water Cleanup |
| SCIV | Secondary Containment Isolation Valve |
| SDV | Scram Discharge Volume |
| SE | Safety Evaluation |
| SER | Safety Evaluation Report |
| SGT | Standby Gas Treatment |
| SR | Surveillance Requirement |
| S/RV | Safety Relief Valve |
| SRM | Source Range Monitor |
| SSCs | Structures, Systems, and Components |
| STI | Surveillance Test Interval |
| TIP | Transversing Incore Probe |
| TRM | Technical Requirements Manual |
| TS | Technical Specification |
| TSTF | Technical Specifications Task Force |
| UHS | Ultimate Heat Sink |
| USAR | Updated Safety Analysis Report |

## ATTACHMENT 2

## Table A - Administrative Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 1.0<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 1.1 | 1.0,<br>3.1.A,<br>3.3.A.1 |
| 1.0<br>A.2 | The CTS Section 1.0 Definition introduction states "The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the Specifications may be achieved." The Note to ITS Section 1.1 states "The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases." This changes the CTS by replacing the CTS Section 1.0 introduction of the definitions with a Note. | 1.1 | 1.0,<br>3.1.A,<br>3.3.A.1 |
| 1.0<br>A.3 | CTS 1.0.A provides the definition of Alteration of the Reactor Core. ITS Section 1.1 provides a definition of CORE ALTERATION that includes an additional phrase that states "Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position." This changes the CTS by adding this phrase to the definition. | 1.1 | 1.0.A |
| 1.0<br>A.4 | CTS Section 1.0 does not provide a definition of SHUTDOWN MARGIN (SDM). However, CTS 3.3.A.1 does specify that the core loading shall be limited to that "which can be made subcritical in the most reactive condition during the operating cycle with the strongest operable control rod in its full-out position and all other operable rods fully inserted," and CTS 4.3.A.1 specifies "that the core can be made subcritical at any time in the subsequent fuel cycle with the strongest operable control rod fully withdrawn and all other operable rods fully inserted." ITS Section 1.1 includes a definition for SDM, which states "SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that: a. The reactor is xenon free; b. The moderator temperature is 68°F; and c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM." This changes the CTS as follows:<br><br>a. An explicit allowance has been included in the ITS Section 1.1 SDM definition to compensate for control rods which are not capable of being fully inserted; and<br><br>b. This change adds specific details defining the most reactive shutdown condition to which the SDM is analyzed; i.e., the reactor is xenon free and the moderator temperature is 68°F. | 1.1 | 3.3.A.1,<br>4.3.A.1 |
| 1.0<br>A.5 | CTS 1.0.D includes the definition of Immediate. It states "Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action." The ITS includes Section 1.3, "Completion Times," which describes the meaning of the term "immediately" when used as a Completion Time. It states "When "immediately" is used, the Required Action should be pursued without delay and in a controlled manner." This changes the CTS by | 1.3 | 1.0.D |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | deleting the definition of "Immediate" but adds a description to the ITS of "immediately" when used as a Completion Time. | | |
| 1.0<br>A.6 | CTS 1.0.E defines Instrument Functional Test as "the injection of a simulated signal into the primary sensor to verify proper instrument channel response, alarm, and/or initiating action." ITS Section 1.1 defines CHANNEL FUNCTIONAL TEST as "the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY" and states that the test "may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS. The addition of use of an "actual" signal is discussed in DOC L.2 while the allowance to inject the signal "as close to the sensor as practicable" in lieu of "into" the sensor is discussed in DOC L.3.<br><br>a. The CTS definition states that the Instrument Functional Test shall verify "proper instrument channel response, alarm, and/or initiating action." The ITS definition states that the CHANNEL FUNCTIONAL TEST shall verify "OPERABILITY of all devices in the channel required for channel OPERABILITY."<br><br>b. The ITS definition states "The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps." The CTS definition does not include this statement. | 1.1 | 1.0.E |
| 1.0<br>A.7 | CTS 1.0.F defines an Instrument Calibration as "the adjustment of an instrument signal output so that it corresponds, within acceptable range, accuracy, and response time to a known value(s) of the parameter which the instrument monitors. Calibration shall encompass the entire instrument including actuation, alarm or trip. Response time is not part of the routine instrument calibration but will be checked once per cycle." ITS 1.0 defines a CHANNEL CALIBRATION as "the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps." This results in a number of changes to the CTS.<br><br>a. The CTS definition states "Calibration shall encompass the entire instrument including actuation, alarm or trip." The ITS definition states "The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY."<br><br>b. The ITS definition states that the CHANNEL CALIBRATION shall encompass the | 1.1 | 1.0.F |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | "CHANNEL FUNCTIONAL TEST." The CTS definition does not include this statement.<br><br>c. The ITS definition adds the statement "Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel." This allowance is not specifically stated in the CTS definition.<br><br>d. The ITS definition states "The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps." The CTS definition does not include this statement.<br><br>e. The CTS definition states that the response time is not part of the routine instrument calibration but is checked once per cycle. The ITS definition does not include this statement. | | |
| 1.0<br>A.8 | CTS Section 1.0 includes the following definitions:<br><br>1.0.G, Limiting Conditions for Operation (LCO);<br>1.0.I, Limiting Safety System Setting (LSSS);<br>1.0.M, Operating;<br>1.0.N, Operating Cycle;<br>1.0.P, Primary Containment Integrity;<br>1.0.Q, Protective Instrumentation Logic Definitions;<br>1.0.R, Rated Neutron Flux;<br>1.0.T, Reactor Coolant System Pressure or Reactor Vessel Pressure;<br>1.0.U, Refueling Operation and Refueling Outage;<br>1.0.V, Safety Limit;<br>1.0.W, Secondary Containment Integrity;<br>1.0.Z, Simulated Automatic Actuation;<br>1.0.AA, Transition Boiling;<br>1.0.AI, Purging;<br>1.0.AJ, Venting; and<br>1.0.AR, Allowable Value.<br><br>The ITS does not use this terminology and ITS Section 1.1 does not contain these definitions. This changes the CTS by deleting definitions that are not necessary. | N/A | 1.0.G,<br>1.0.I,<br>1.0.M,<br>1.0.N,<br>1.0.P,<br>1.0.Q,<br>1.0.R,<br>1.0.T,<br>1.0.U,<br>1.0.V,<br>1.0.W,<br>1.0.Z,<br>1.0.AA,<br>1.0.AI,<br>1.0.AJ,<br>1.0.AR |
| 1.0<br>A.9 | The CTS 1.0.J definition of Minimum Critical Power Ratio (MCPR) states that "The minimum critical power ratio is the value of critical power ratio associated with the most limiting assembly in the reactor core." In addition, the CTS 1.0.J definition states that the "Critical power ratio (CPR) is the ratio of that power in a fuel assembly which is calculated by the GEXL correlation to cause some point in the assembly to experience boiling transition to the actual assembly operating power." ITS Section 1.1 definition of | 1.1 | 1.0.J |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | MCPR states that "The MCPR shall be the smallest critical power ratio (CPR) that exists in the core for each class of fuel. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power." This changes the CTS definition of MCPR by specifying a separate MCPR is applicable to "each class of fuel" instead of a single MCPR is associated with the "most limiting assembly" and removes the explicit correlation that must be used to calculate CPR. | | |
| 1.0<br>A.10 | The CTS 1.0.L definition of Operable requires a system, subsystem, train, component, or device to be capable of performing its "specified function(s)," and requires all necessary support systems that are required for the system, subsystem, train, component, or device to perform its "function(s)" also be capable of performing their related support function(s). The ITS Section 1.1 definition of OPERABLE-OPERABILITY requires the system, subsystem, division, component, or device to be capable of performing the "specified safety function(s)," and requires all necessary support systems that are required for the system, subsystem, division, component, or device to perform its "specified safety function(s)" to also be capable of performing their related support functions. This changes the CTS by altering the requirement of the system, subsystem, etc., to be able to perform "specified function(s)" or "function(s)" to a requirement to be able to perform "specified safety function(s)." | 1.1 | 1.0.L |
| 1.0<br>A.11 | The CTS 1.0.L definition of Operable requires that all necessary normal "and" emergency electrical power sources be available for the system, subsystem, train, component, or device to be OPERABLE. The ITS Section 1.1 definition of OPERABLE-OPERABILITY requires all necessary normal "or" emergency electrical power be available for the system, subsystem, etc. This changes the CTS definition of Operable by allowing a device to be considered OPERABLE with either normal or emergency power available. | 1.1 | 1.0.L |
| 1.0<br>A.12 | CTS Section 1.0 provides definitions for Pressure Boundary Leakage (CTS 1.0.AB), Identified Leakage (CTS 1.0.AC), Unidentified Leakage (CTS 1.0.AD), and Total Leakage (CTS 1.0.AE). ITS Section 1.1 includes these requirements in one definition called LEAKAGE and includes four categories: identified LEAKAGE; unidentified LEAKAGE; total LEAKAGE; and pressure boundary LEAKAGE. This changes the CTS by incorporating the four separate definitions into a single definition with no technical changes. | 1.1 | 1.0.AB,<br>1.0.AC,<br>1.0.AD,<br>1.0.AE |
| 1.0<br>A.13 | CTS 1.0.AB states "Pressure boundary leakage shall be the leakage through a non-isolable fault in the reactor coolant system pressure boundary." ITS Section 1.1 states pressure boundary LEAKAGE is the LEAKAGE through a nonisolable fault in a Reactor Coolant System (RCS) "component body, pipe wall, or vessel wall." This changes the CTS by explicitly stating the components of the RCS pressure boundary. | 1.1 | 1.0.AB |
| 1.0<br>A.14 | ITS Section 1.1 provides definitions of ACTIONS, AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR), LINEAR HEAT GENERATION RATE (LHGR), LOGIC SYSTEM FUNCTIONAL TEST, STAGGERED TEST BASIS, THERMAL POWER, and | 1.1 | N/A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | TURBINE BYPASS SYSTEM RESPONSE TIME. These terms are not defined in the CTS. This changes the CTS by adding the above terms. | | |
| 1.0<br>A.15 | ITS Sections 1.2, 1.3, and 1.4 contain information that is not in the CTS. This change to the CTS adds explanatory information on ITS usage that is not applicable to the CTS. The added sections are:<br><br>· <u>Section 1.2 - Logical Connectors</u><br><br>Section 1.2 provides specific examples of the logical connectors "<u>AND</u>" and "<u>OR</u>" and the numbering sequence associated with their use.<br><br>· <u>Section 1.3 - Completion Times</u><br><br>Section 1.3 provides guidance on the proper use and interpretation of Completion Times. The section also provides specific examples that aid in the use and understanding of Completion Times.<br><br>· <u>Section 1.4 - Frequency</u><br><br>Section 1.4 provides guidance on the proper use and interpretation of Surveillance Frequencies. The section also provides specific examples that aid in the use and understanding of Surveillance Frequency. | 1.2,<br>1.3,<br>1.4 | N/A |
| 1.0<br>A.16 | CTS 3.1.A states that the time from initiation of any Reactor Protection System (RPS) channel trip to the de-energization of the scram pilot valve solenoids shall not exceed 50 milliseconds. ITS Section 1.1 includes a definition of REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME. The ITS definition is consistent with the CTS 3.1.A, but includes the statement "The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured." This changes the CTS by adding the sentence associated with the manner of testing. Any change to the response value of 50 milliseconds is discussed in the Discussion of Changes for ITS 3.3.1.1. | 1.1 | 3.1.A |
| 1.0<br>A.17 | These changes to CTS 1.0.U are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | None | 1.0.U |
| 2.0<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 2.0 | 2.0 |
| 3.0<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, | 3.0 | 4.0 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
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| | editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | |
| 3.0<br>A.2 | ITS LCO 3.0.1 and LCO 3.0.2 are added to the CTS to provide guidance regarding LCOs and ACTIONS. ITS LCO 3.0.1 states "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7." ITS LCO 3.0.2 states "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated." The changes to the CTS are:<br><br>CTS 3/4.0 does not include any general LCO/ACTION guidance requirements. However, in general the CTS LCOs require either the equipment to be OPERABLE or parameters to be met during the specified conditions. This is consistent with ITS LCO 3.0.1. In addition, if the LCO is not met, the applicable CTS Specification provides the appropriate actions to take. ITS LCO 3.0.2 states, in part, "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met." This statement is consistent with the current application of CTS actions. The second sentence of ITS LCO 3.0.2 states, in part, "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required." This statement is also consistent with the current application of the CTS actions. The second sentence of ITS LCO 3.0.2 includes the phrase, "unless otherwise stated" at the end of the sentence. There are some ITS ACTIONS, which must be completed, even if the LCO is met or is no longer applicable. While this is a new requirement, the technical aspects of these changes are discussed in the appropriate ITS Specifications.<br><br>LCO 3.0.2 includes exceptions for LCO 3.0.5 and LCO 3.0.6. LCO 3.0.5 is a new allowance, for a system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY, that takes exception to the ITS LCO 3.0.2 requirement. LCO 3.0.6 is a new allowance that takes exception to the ITS LCO 3.0.2 requirement to take the Required Actions of a supported system LCO when the inoperability is only associated with a support system LCO. These exceptions are included in LCO 3.0.2 to avoid conflicts between the applicability requirements.<br><br>ITS LCO 3.0.1 includes a statement that exceptions to ITS LCO 3.0.1 are provided in LCO 3.0.2 and LCO 3.0.7. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs. | LCO 3.0.1,<br>LCO 3.0.2 | N/A |
| 3.0<br>A.3 | ITS LCO 3.0.6 is added to the CTS to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the | LCO 3.0.6 | N/A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | inoperability of one or more related systems (supported system(s)). LCO 3.0.6 states "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2." In the CTS, based on the intent and interpretation provided by the NRC over the years, there has been an ambiguous approach to the combined support/supported inoperability. | | |
| 3.0<br>A.4 | ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states "Special Operations LCOs in Section 3.10 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications." This changes the CTS by adding specific guidance concerning the use of special test exception type LCOs. | LCO 3.0.7 | N/A |
| 3.0<br>A.5 | CTS 4.0.A states "The surveillance requirements of this section shall be met. Each surveillance requirement shall be performed at the specified times except as allowed in B and C below." CTS 4.0.C states, in part, "Whenever the plant condition is such that a system or component is not required to be operable the surveillance testing associated with that system or component may be discontinued." CTS 4.0.D states "If it is discovered that a surveillance was not performed within the extended time interval allowed by 4.0.B, then the affected equipment shall be declared inoperable." ITS SR 3.0.1 states "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes to the CTS are: | SR 3.0.1 | 4.0.A, 4.0.C, 4.0.D |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | CTS 4.0.A states, in part, "The surveillance requirements of this section shall be met." CTS 4.0.A also states, in part, "Each surveillance requirement shall be performed at the specified times except as allowed in . . . C below." CTS 4.0.C states "Whenever the plant condition is such that a system or component is not required to be operable the surveillance testing associated with that system or component may be discontinued." The first sentence of ITS SR 3.0.1 states "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR." This changes the CTS by combining the two CTS requirements into a single cogent requirement.<br><br>The second sentence of ITS SR 3.0.1 includes the statement, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." This changes the CTS by adding the clarification "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance."<br><br>ITS 4.0.A states, in part, "Each surveillance requirement shall be performed at the specified times except as allowed in B … below." CTS 4.0.D states "If it is discovered that a surveillance was not performed within the extended time interval allowed by 4.0.B, then the affected equipment shall be declared inoperable." The third sentence of ITS SR 3.0.1 states "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3." This changes the CTS by replacing the CTS phrases "except as allowed in B ... below" and "within the extended time interval allowed by 4.0.B" with the ITS phrase "within the specified Frequency" and the CTS statement "then the affected equipment shall be declared inoperable" with the ITS statement "shall be failure to meet the LCO." In addition, a reference to ITS SR 3.0.3 (CTS 4.0.E) has been added. The CTS is also changed by combining CTS 4.0.A and CTS 4.0.D. | | |
| 3.0<br>A.6 | CTS 4.0.B states, in part, "Specific time intervals between tests may be extended up to 25% of the surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in several changes to the CTS.<br><br>ITS SR 3.0.2 adds to the CTS "For Frequencies specified as ‘once,’ the above interval extension does not apply." This change is described in DOC M.2. | SR 3.0.2 | 4.0.B |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ITS SR 3.0.2 adds to the CTS "If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L.3.<br><br>CTS 4.0.B states, in part, "Specific time intervals between tests may be extended up to 25% of the surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change to the CTS is made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met.<br><br>ITS SR 3.0.2 is also more specific regarding the start of the Frequency by stating "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications.<br><br>ITS SR 3.0.2 adds to the CTS the statement "Exceptions to this Specification are stated in the individual Specifications." | | |
| 3.0<br>A.7 | These changes to CTS 4.0.B are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | None | 4.0.B |
| 3.1.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.1.1 | 3/4.3.A.1, 3.3.G |
| 3.1.1<br>A.2 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.1.1 ACTIONS A, B, C, D, and E | 3.3.G.1, 3.3.G.2 |
| 3.1.1<br>A.3 | CTS 3.3.G.2 requires the immediate suspension of core alterations except for "fuel assembly removal" and to "immediately initiate action to fully insert all insertable control rods in core cell containing one or more fuel assemblies" if CTS 3.3.A is not met when the reactor mode switch is in the Refuel position. ITS 3.1.1 ACTION E covers the condition for SDM not met in MODE 5, and in part, requires the immediate suspension of CORE ALTERATIONS except for "control rod insertion and fuel assembly removal" and requires the immediate initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. This changes the CTS by clarifying that CORE ALTERATIONS that involve "the insertion of control rods" are also excepted. | 3.1.1 ACTION E | 3.3.G.2 |
| 3.1.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, | 3.1.2 | 3/4.3.E |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | |
| 3.1.2<br>A.2 | CTS 4.3.E states, in part, the reactivity anomaly Surveillance must be performed "During the startup test program." ITS SR 3.1.2.1 does not include this requirement. This changes the CTS by deleting the requirement to perform this test "During the startup test program." | None | 4.3.E |
| 3.1.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.1.3 | 3/4.3.A.2, 3/4.3.B.1, 3.3.G |
| 3.1.3<br>A.2 | CTS 3/4.3.A.2 provides requirements for stuck control rods. CTS 3/4.3.B.1 provides requirements for control rod coupling. ITS 3.1.3 provides requirements for each control rod. ITS LCO 3.1.3 states "Each control rod shall be OPERABLE." This changes the CTS by combining the OPERABILITY requirements for control rods into one Specification and adding an explicit statement concerning control rod OPERABILITY. Additional aspects of control rod OPERABILITY are also added in accordance with DOC M.4. | 3.1.3 | 3/4.3.A.2, 3/4.3.B.1 |
| 3.1.3<br>A.3 | CTS 3.3.A.2.(a) states that the directional control valves for inoperable control rods shall be disarmed. CTS 3.3.B.1 states that each control rod shall be coupled to its drive or completely inserted and the directional control valves disarmed. These CTS Actions do not limit the number of control rods to which these Actions apply. ITS 3.1.3 ACTIONS Note states "Separate Condition entry is allowed for each control rod." This changes the CTS by adding an explicit Note for separate condition entry for each control rod. | 3.1.3 ACTIONS Note | 3.3.A.2.(a), 3.3.B.1 |
| 3.1.3<br>A.4 | CTS 3.3.A.2.(a) states, in part, "The directional control valves for inoperable control rods shall be disarmed." CTS 3.3.B.1 states, in part, "Each control rod shall be coupled to its drive or completely inserted and the directional control valves disarmed." These compensatory actions are covered in ITS 3.1.3 ACTION A for stuck rods and ITS 3.1.3 ACTION C for coupling inoperabilities. In addition, these ITS 3.1.3 ACTIONS include a Note that states rod worth minimizer (RWM) may be bypassed as allowed by LCO 3.3.2.1, "Control Rod Block Instrumentation," if required, to allow continued operation. This changes the CTS by adding these clarification Notes. | 3.1.3 ACTION A Note, 3.1.3 Required Action C.1 Note | 3.3.A.2.(a), 3.3.B.1 |
| 3.1.3<br>A.5 | CTS 3.3.A.2 does not explicitly state when the stuck control rod requirements are required to be met. However, CTS 3.3.A.2.(b) states that the reactor should be brought to hot shutdown under certain situations. ITS 3.1.3 is applicable in MODES 1 and 2. This changes the CTS by explicitly stating the Applicability. | 3.1.3 Applicability | 3.3.A.2, 3.3.A.2.(b) |
| 3.1.3<br>A.6 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.1.3 ACTION E | 3.3.G.1 |
| 3.1.4 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant | 3.1.4 | 3/4.3.C, 3.3.G |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.1 | specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | |
| 3.1.4<br>A.2 | When the scram time requirements of CTS 3.3.C are not met, CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours. ITS 3.1.4 ACTION A only requires a shutdown to MODE 3. This changes the CTS by stating the unit must be shut down to MODE 3 instead of to MODE 4. The change to the time allowed to reach the required shutdown condition is discussed in DOC M.3. | 3.1.4 ACTION A | 3.3.G.1 |
| 3.1.4<br>A.3 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.1.4<br>ACTION A | 3.3.G.1 |
| 3.1.5<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.1.5 | 3/4.3.D, 3.3.G |
| 3.1.5<br>A.2 | CTS 3.3.D states, in part, that if "a" control rod with an inoperable accumulator is inserted full-in and either its directional control valves are electrically disarmed or is hydraulically isolated, it shall not be considered to have an inoperable accumulator. CTS 3.3.D.1 states, in part, that "a" rod accumulator may be inoperable provided that no other control rod within two control rod cells in any direction has an inoperable accumulator or directional control valve are electrically disarmed while in a non-fully inserted position. These CTS Actions do not limit the number of accumulators to which these Actions apply. ITS 3.1.5 ACTIONS Note allows separate Condition entry for each control rod scram accumulator. This changes the CTS by adding an explicit Note for separate Condition entry for each control rod scram accumulator. | 3.1.5 ACTIONS Note | 3.3.D, 3.3.D.1 |
| 3.1.5<br>A.3 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.1.5<br>ACTION D | 3.3.G.1 |
| 3.1.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.1.6 | 3.3.B.3.(a), 3.3.G |
| 3.1.6<br>A.2 | CTS 3.3.B.3.(a) states "Control rod withdrawal sequences shall be established so that the maximum calculated reactivity that could be added by dropout of any increment of any one control blade will not make the core more than 1.3% Dk supercritical." Implicit in this requirement is that once the control rod withdrawal sequence is established it will be maintained. ITS LCO 3.1.6 states "OPERABLE control rods shall comply with the | LCO 3.1.6 | 3.3.B.3.(a) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | requirements of the banked position withdrawal sequence (BPWS)." This changes the CTS by requiring a control rod withdrawal sequence to be continuously met by clarifying the actual control rod withdrawal sequence being used at Monticello. The change that relocates the details of the system design of control rod withdrawal sequences is discussed in DOC LA.1. | | |
| 3.1.6<br>A.3 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.1.6 ACTIONS A and B | 3.3.G.1 |
| 3.1.7<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.1.7 | 3/4.4 |
| 3.1.7<br>A.2 | CTS 3.4.A.1 requires the Standby Liquid Control (SLC) System to be OPERABLE at all times when fuel is in the reactor and the reactor is not shut down by control rods. ITS LCO 3.1.7 requires the SLC System to be OPERABLE in MODES 1 and 2. This changes the CTS by explicitly stating the applicable MODES in which the SLC System must be OPERABLE. | 3.1.7 Applicability | 3.4.A.1 |
| 3.1.7<br>A.3 | CTS 4.4.A.1 specifies those Surveillance Requirements that must be performed "At least once per quarter." CTS 4.4.A.1 only requires the performance of a SLC System flow test. However, CTS 4.4.A.1 also states that the SLC System flow test must be performed "in accordance with the Inservice Testing Program." ITS SR 3.1.7.7 requires the same test to be performed "In accordance with the Inservice Testing Program." This changes the CTS by deleting the duplicative information associated with the testing Frequency. | SR 3.1.7.7 | 4.4.A.1 |
| 3.1.7<br>A.4 | CTS 4.4.B.1 requires a determination of boron enrichment, but does not specify the actual limit. The design limit for Monticello is 55.0 atom percent, as stated in CTS Figure 3.4-1. ITS SR 3.1.7.10 requires verification that the sodium pentaborate enrichment is $^{3}$ 55.0 atom percent. This changes the CTS by specifying the actual limit in the sodium pentaborate enrichment verification Surveillance. | SR 3.1.7.10 | 4.4.B.1, Figure 3.4-1 |
| 3.1.7<br>A.5 | CTS 4.4.A.2 requires the performance of a SLC System test at least once "during each operating cycle." ITS SR 3.1.7.8 requires performance of an SLC test every "24 months" on a STAGGERED TEST BASIS. This changes the CTS by changing the Frequency from "during each operating cycle" to "24 months." | SR 3.1.7.8 | 4.4.A.2 |
| 3.1.7<br>A.6 | CTS 4.4.A.2.a requires the performance of a SLC subsystem test to verify flow can be injected into the reactor vessel. During this test SLC pump capacity must be verified. ITS SR 3.1.7.8 requires the performance of the same test, however the requirement to verify pump capacity has not been included. This changes the CTS by deleting the specific requirement to verify SLC pump capacity during the SLC subsystem reactor vessel injection test. | None | 4.4.A.2.a |
| 3.1.8 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant | 3.1.8 | 3/4.3.F |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.1 | specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | |
| 3.1.8<br>A.2 | CTS 3.3.F.2.b states, in part, "Maintaining the inoperable valves(s), or the associated redundant valve(s), in the closed position" if the inoperable valve is not restored to OPERABLE status in 7 days. ITS 3.1.8 Required Actions A.1 and B.1 state "Isolate the associated line." This changes the CTS by simplifying the Required Action by requiring isolation of the associated line instead of explicitly stating which valves to use to perform the isolation (i.e., inoperable valve(s) or the associated redundant valves(s)). | 3.1.8 Required Actions A.1 and B.1 | 3.3.F.2.b |
| 3.1.8<br>A.3 | CTS 3.3.F.2 states, in part, "If a or b above cannot be met, at least all but one operable control rods (not including rods removed per specification 3.10.E or inoperable rods allowed by 3.3.A.2) shall be fully inserted." ITS 3.1.8 ACTION C, under the same conditions requires the unit to be in MODE 3. This changes the CTS by more clearly defining the all rods in condition as MODE 3. | 3.1.8 ACTION C | 3.3.F.2 |
| 3.1.8<br>A.4 | CTS 3.3.F states, in part, "verify the scram discharge volume vent and drain valves close within 30 seconds after receipt of a reactor scram signal and open when the scram is reset." ITS SR 3.1.8.3 requires the same test however the proposed Surveillance states that the reactor scram signal may be an "actual or simulated" signal. This changes the CTS by clarifying that the reactor scram signal may be either an "actual or simulated" reactor scram signal. | SR 3.1.8.3 | 3.3.F |
| 3.1.8<br>A.5 | CTS 4.3.F requires a SDV vent and drain valve test to be performed "Once per operating cycle." ITS SR 3.1.8.3 requires performance of an SDV vent and drain valve test every "24 months." This changes the CTS by changing the Frequency from "Once per operating cycle" to "24 months." | SR 3.1.8.3 | 4.3.F |
| 3.2.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.2.1 | 3/4.11.A |
| 3.2.1<br>A.2 | CTS 3.11.A states that the APLHGR should not exceed limits during "power operation," which is defined in CTS 1.0.O as "above 1% rated thermal power." However, CTS 3.11.A only states to reduce thermal power to "less than 25%" if the APLHGR LCO is being exceeded and the APLHGRs are not returned to within limits within the specified time. ITS LCO 3.2.1 is applicable at THERMAL POWER ≥ 25% RTP. ITS 3.2.1 ACTION B requires a THERMAL POWER reduction to < 25% RTP if the APLHGR(s) are not restored to within limits within the specified time limit of ACTION A. This changes the CTS by changing the Applicability from > 1% rated thermal power to ≥ 25% RTP. | 3.2.1 Applicability | 3.11.A |
| 3.2.1<br>A.3 | CTS 3.11.A states "Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits." ITS 3.2.1 does not include this statement. This changes the CTS by deleting this statement. | None | 3.11.A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.2.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.2.2 | 3/4.11.C |
| 3.2.2<br>A.2 | CTS 3.11.C does not state when the MCPR LCO is required to be met, however CTS 3.11.C states "reduce thermal power to less than 25%" if the limiting value for MCPR is being exceeded and the MCPR is not returned to within limits within the specified time. ITS LCO 3.2.2 is applicable at THERMAL POWER ≥ 25% RTP. ITS 3.2.2 ACTION B requires a THERMAL POWER reduction to < 25% RTP if the MCPR(s) are not restored to within limits within specified time limit of ACTION A. This changes the CTS by clearly specifying the Applicability as ≥ 25% RTP. | 3.2.2 Applicability | 3.11.C |
| 3.2.2<br>A.3 | CTS 3.11.C states "Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits." ITS 3.2.2 does not include this statement. This changes the CTS by deleting this statement. | None | 3.11.C |
| 3.2.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.2.3 | 3.11.B |
| 3.2.3<br>A.2 | CTS 3.11.B states that the LHGR should not exceed limits during "power operation," which is defined in CTS 1.0.O as "above 1% rated thermal power." However, CTS 3.11.B only states to reduce THERMAL POWER to "less than 25%" if the limiting values for LHGR is being exceeded and the LHGRs are not returned to within limits within the specified time. ITS LCO 3.2.3 is applicable at THERMAL POWER ≥ 25% RTP. ITS 3.2.3 ACTION B requires a THERMAL POWER reduction to < 25% RTP if the LHGR(s) are not restored to within limits within the specified time limit of ACTION A. This changes the CTS by changing the Applicability from > 1% RATED THERMAL POWER ≥ 25% RTP. | 3.2.3 Applicability | 3.11.B |
| 3.2.3<br>A.3 | CTS 3.11.B states "Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits." ITS 3.2.3 does not include this statement. This changes the CTS by deleting this statement. | None | 3.11.B |
| 3.3.1.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.1.1 | 3.1.A, 3.1.B, 4.1.A, Tables 3.1.1, 4.1.1, and 4.1.2 |
| 3.3.1.1<br>A.2 | CTS 3.1.A specifies the applicability requirements for the RPS Instrumentation Functions based on "each position of the reactor mode switch as indicated in Table 3.1.1." ITS Table 3.3.1.1-1 either specifies the Applicable MODES as defined in ITS Section 1.1 or other specified conditions. This changes the CTS by using the defined term of MODES in the Applicability, whenever possible. Changes to the actual | Table 3.3.1.1-1 | 3.1.A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | requirements for when the RPS instrumentation must be OPERABLE are discussed below in other DOCs. | | |
| 3.3.1.1<br>A.3 | CTS 3.1.B states "Upon discovery that the requirements for the number of operable or operating trip systems or instrument channels are not satisfied, action shall be initiated as follows:" ITS 3.3.1.1 ACTIONS Note states "Separate Condition entry is allowed for each channel." This changes the CTS by clarifying that separate Condition entry is allowed for each channel. | 3.3.1.1 ACTIONS Note | 3.1.B |
| 3.3.1.1<br>A.4 | CTS Table 3.1.1 Trip Function 8.a requires two "East" Scram Discharge Volume High Level channels to be OPERABLE in each trip system while CTS Table 3.1.1 Trip Function 8.b requires two "West" Scram Discharge Volume High Level channels to be OPERABLE in each trip system. ITS Table 3.3.1.1-1 Function 7.a requires two Resistance Temperature Detector channels to be OPERABLE in each trip system while Function 7.b requires two Float Switch channels to be OPERABLE in each trip system. This changes the CTS by specifying the "type of channels" instead of the "location" of the channels. | Table 3.3.1.1-1 Functions 7.a and 7.b | Table 3.1.1 Trip Functions 8.a and 8.b |
| 3.3.1.1<br>A.5 | CTS Table 3.1.1 requires the Main Steamline Isolation Valve Closure Trip Function (Trip Function 10) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run positions. However, CTS Table 3.1.1 Note (b) states that the MSIV closure scram function may be bypassed in the Refuel and Startup modes if reactor pressure is below 600 psig. Furthermore, CTS Table 3.1.1 Note (3) states that the only RPS Trip Functions that are required to be OPERABLE when in the refueling mode with the reactor subcritical and reactor water temperature less than 212°F are Mode Switch in Shutdown, Manual Scram, High Flux IRM (i.e., Neutron Flux IRM High - High and Neutron Flux IRM Inoperative), and Scram Discharge Volume High Level. ITS Table 3.3.1.1-1 Function 5 requires the Main Steam Isolation Valve - Closure Function to be OPERABLE in MODE 1 and MODE 2 with reactor pressure $\geq$ 600 psig (as stated in ITS Table 3.3.1.1-1 Note c). This changes the CTS by clearly stating the Applicability of the Main Steamline Isolation Valve Closure Trip Function. | Table 3.3.1.1-1 Function 5 including Note c | Table 3.1.1 Trip Function 10, including Notes (b) and (3) |
| 3.3.1.1<br>A.6 | CTS Table 3.1.1 Note (1) states that a channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition provided "that at least one other operable channel in the same trip system is monitoring that parameter." ITS 3.3.1.1 Surveillance Requirements Table Note 2 states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided "the associated Function maintains RPS trip capability." This changes the CTS by replacing the words "at least one other operable channel in the same trip system is monitoring that parameter" with "the associated Function maintains RPS trip capability." | 3.3.1.1 Surveillance Requirements Note 2 | Table 3.1.1 Note (1) |
| 3.3.1.1<br>A.7 | CTS Table 3.1.1 requires the Turbine Control Valve Fast Closure and Turbine Stop Valve Closure Trip Functions (Trip Functions 11 and 12) to be OPERABLE when the reactor mode switch is in the Run position. However, CTS Table 3.1.1 footnote **.d states that these scram functions may be bypassed when the reactor thermal power is $\leq$ | 3.3.1.1 ACTION E, Table 3.3.1.1-1 Functions 8 and 9 | Table 3.1.1 Trip Functions 11 and 12 including footnote **.d, Table 3.1.1 Required |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | 45%. The Note also provides a parenthetical reference that 45% rated thermal power is equivalent to 798.75 MWt. CTS Table 3.1.1 Required Condition D also provides a similar parenthetical reference. ITS Table 3.3.1.1-1 Functions 8 and 9 specify the Applicability to be > 45% RTP and ITS 3.3.1.1 ACTION E requires the unit to be $\leq$ 45% RTP. This changes the CTS by deleting the actual thermal power level (798.75 MWt) from the Applicability and Action. | | Condition D |
| 3.3.1.1<br>A.8 | When the requirements of CTS 3.1.B are not met for the Mode Switch in Shutdown, Manual Scram, Neutron Flux IRM High - High, Neutron Flux IRM Inoperable, High Reactor Pressure, High Drywell Pressure, Reactor Low Water Level, and Scram Discharge Volume High Level (East and West) Trip Functions (CTS Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 5, 6, 7, 8.a, and 8.b), CTS Table 3.1.1 (Required Condition A) requires all OPERABLE control rods to be fully inserted. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A, B, and C are not met) and when the unit is in MODE 1 or 2, ITS 3.3.1.1 ACTION G will require the unit to be in MODE 3. CTS 3.1.B.3 states that the plant must be placed in the required specified conditions (i.e., one of the Required Conditions referenced in CTS Table 3.1.1) "using normal operating procedures." The Monticello shutdown procedure requires the reactor mode switch to be placed in the shutdown position after all the control rods are inserted, if shutting down the plant by individually inserting each control rod. The other method specified in the Monticello shutdown procedure for shutting down the plant includes placing the reactor mode switch in the shutdown position while still critical. Therefore, the normal operating procedures invoked by the CTS already require the reactor mode switch to be placed in the shutdown position. M.3 discusses the more restrictive time requirements for this change. | 3.3.1.1 ACTION G | Table 3.1.1 Required Condition A for Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 5, 6, 7, 8.a, and 8.b |
| 3.3.1.1<br>A.9 | CTS Table 4.1.1 for the Mode Switch in Shutdown Instrument Channel specifies an "Operating Cycle" Frequency for the CHANNEL FUNCTIONAL TEST. CTS Table 4.1.2 for the Low Reactor Water Level transmitters, Main Steamline Isolation Valve Closure Channels, and Turbine Stop Valve Closure Instrument Channels is specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION. CTS 1.0.F, the definition of Instrument Calibration, states that Response time is not part of the routine instrument calibration but will be checked once "per cycle." ITS SR 3.3.1.1.10 requires the performance of a CHANNEL FUNCTIONAL TEST and SR 3.3.1.1.11 requires performance of a CHANNEL CALIBRATION every "24 months." ITS SR 3.3.1.1.14 requires verification that the RPS RESPONSE TIME is within limits every "24 months" on a STAGGERED TEST BASIS. This changes the CTS by changing the Frequency from once each "Operating Cycle" to "24 months." The change to add the STAGGERED TEST BASIS allowance to ITS SR 3.3.1.1.14 is discussed in DOC L.11. | SR 3.3.1.1.10,<br>SR 3.3.1.1.11,<br>SR 3.3.1.1.14 | Table 4.1.1 (for Mode Switch in Shutdown channel), Table 4.1.2 (for Low Reactor Water Level transmitters, Main Steamline Isolation Valve Closure channels, and Turbine Stop Valve Closure channels, 1.0.F |
| 3.3.1.1<br>A.10 | CTS Table 4.1.1 Note 4 states that functional tests are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. CTS Table 4.1.2 Note 2 includes a similar Note for calibration tests. These explicit requirements are not retained in ITS 3.3.1.1. The allowances in SR 3.0.1 | SR 3.0.1 | Table 4.1.1 Note 4,<br>Table 4.1.2 Note 2 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | and the associated actions provide adequate guidance with respect to when the associated surveillances are required to be performed and this explicit requirement is not retained. This changes the CTS by not including these explicit requirements. | | |
| 3.3.1.1<br>A.11 | CTS Table 4.1.1 Note 5 states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.1.1. The ITS 1.0 definition provides adequate guidance with respect to performance requirements of a CHANNEL FUNCTIONAL TEST and this explicit requirement is not retained. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.1.1 Note 5 |
| 3.3.1.1<br>A.12 | CTS Table 3.1.1 requires the Turbine Control Valve Fast Closure and Turbine Stop Valve Closure Trip Functions (Trip Functions 11 and 12) to be OPERABLE when the reactor mode switch is in the Run position. However, CTS Table 3.1.1 footnote **.d states that these scram functions may be bypassed when the reactor thermal power is $\leq$ 45%. ITS Table 3.3.1.1-1 Functions 8 and 9 require the Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Acceleration Relay Oil Pressure - Low Functions to be OPERABLE at > 45% RTP. This changes the CTS by clearly stating the Applicability of the Turbine Control Valve Fast Closure and Turbine Stop Valve Closure Trip Functions. | Table 3.3.1.1-1 Functions 8 and 9 | Table 3.1.1 Trip Functions 11 and 12 including footnote **.d |
| 3.3.1.1<br>A.13 | When the requirements of CTS 3.1.B are not met for the Mode Switch in Shutdown, Manual Scram, Neutron Flux IRM High - High, Neutron Flux IRM Inoperable, and Scram Discharge Volume High Level (East and West) Trip Functions (CTS Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b), CTS Table 3.1.1 (Required Condition A) requires all OPERABLE control rods to be fully inserted. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A, B, and C are not met) and when the unit is in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, ITS 3.3.1.1 ACTION H requires immediate initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. This changes the CTS by specifying the unit must initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies instead of all OPERABLE control rods must be fully inserted. The change to allow some control rods to not be inserted (those in core cells containing no fuel) is discussed in DOC L.3. | 3.3.1.1<br>ACTION H | Table 3.1.1 Required Condition A for Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b |
| 3.3.1.1<br>A.14 | CTS Table 3.1.1 Note (1) states that there shall be two operable "or tripped" trip systems for each function. The allowance for tripping a channel or trip system is included in the ITS 3.3.1.1 ACTIONS. This changes the CTS by deleting the statement requiring two "tripped" trip systems for each function. The detail that there are two trip systems has been relocated to the Bases in accordance with DOC LA.1. | 3.3.1.1 ACTIONS A and B | Table 3.1.1 Note (1) |
| 3.3.1.1<br>A.15 | When the requirements of CTS 3.1.B are not met for the Flow Referenced Neutron Flux APRM High-High, Inoperative, and High Flow Clamp Trip Functions (CTS Table 3.1.1 Trip Functions 4.a, 4.b, and 4.c), CTS Table 3.1.1 Required Condition A or B must be taken. When the requirements of CTS 3.1.B are not met for the Main Steamline | 3.3.1.1 ACTION F | Table 3.1.1 Trip Functions 4.a, 4.b, 4.c, and 10, Table 3.1.1 Required Condition B |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Isolation Valve Closure Trip Function (CTS Table 3.1.1 Trip Function 10), CTS Table 3.1.1 Required Condition A or C must be taken. Required Condition A requires all OPERABLE control rods to be fully inserted, Required Condition B requires reactor power to be on the IRM range or below and the reactor to be in Startup, Refuel, or Shutdown mode, and Required Condition C requires the unit to be in Startup or Refuel mode and pressure below 600 psig. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A, B, and C not met), ITS 3.3.1.1 ACTION F requires the unit to be in MODE 2, and for the Main Steam Isolation Valve - Closure Function only, requires reactor pressure to be reduced to < 600 psig within 12 hours. This changes the CTS by only specifying the highest MODE that will result in the unit exiting the Applicability. | | |
| 3.3.1.1<br>A.16 | ****** This item is heavily-related to BSIs *********<br>****** Final resolution requires resolution of BSIs ******<br>****** Also, Monticello owes clarification to NRC which should arrive April 3, 2006 ****<br><br>CTS 3.1.A states that the "setpoints" must be set in accordance with Table 3.1.1. CTS Table 3.1.1 specifies the "Limiting Trip Settings" for each RPS instrument Function. ITS LCO 3.3.1.1 requires the RPS instrumentations for each Function in Table 3.3.1.1-1 to be OPERABLE and ITS Table 3.3.1.1-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the terms "setpoints" and "Limiting Trip Settings" with "Allowable Value." | LCO 3.3.1.1, Table 3.3.1.1-1 | 3.1.A, Table 3.1.1 |
| 3.3.1.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.1.2 | 3.3.B.4, 3.3.G.1, 3.10.B, 4.3.B.4, 4.10.B |
| 3.3.1.2<br>A.2 | CTS 3.10.B.2 states that an OPERABLE SRM shall have a minimum of 3 CPS. ITS SR 3.3.1.2.4 requires verification that the SRM count rate is ³ 3 CPS and also requires that the signal to noise ratio is ³ 3:1. This change is "A" because the current requirement for the SRM to be 3 CPS is based upon a signal to noise ratio 3:1. This changes the CTS by adding a requirement to verify the SRM signal to noise ratio is within limit. | SR 3.3.1.2.4 | 3.10.B.2 |
| 3.3.1.2<br>A.3 | These changes to CTS 3.3.G are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.3.1.2 ACTIONS A, B, C, and E | 3.3.G |
| 3.3.2.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.2.1 | 1.0.Y, 3.2.C, 3.3.B.3.(b), 4.2, 4.2.C, Table 3.2.3, Table 4.2.1 (Rod Blocks), 4.3.B.3.(a), 4.3.B.3.(b) |
| 3.3.2.1<br>A.2 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when these instruments are not required to be OPERABLE or are | SR 3.0.1 | Table 4.2.1 Note (3) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. The allowances in SR 3.0.1 and the associated actions provide adequate guidance with respect to when the associated surveillances are required to be performed and this explicit requirement is not retained. These explicit requirements are not retained in ITS 3.3.2.1. This changes the CTS by not including these explicit requirements. | | |
| 3.3.2.1<br>A.3 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response alarm and or initiating action. This explicit Note is not needed in ITS 3.3.2.1 since the requirements for the CHANNEL FUNCTIONAL TEST are included in ITS 1.0, "Definitions." These explicit requirements are not retained in ITS 3.3.2.1. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.2.1<br>A.4 | CTS 3.2.C.2.b states that the RBM "Setpoints" for the control rod block are given in Table 3.2.3. CTS Table 3.2.3 specifies the "Trip Settings" for each RBM Function. ITS LCO 3.3.2.1 requires the control rod block instrumentations for each Function in Table 3.3.2.1-1 to be OPERABLE and ITS Table 3.3.2.1-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the terms "Setpoints" and "Trip Settings" with "Allowable Value." | Table 3.3.2.1-1 | 3.2.C.2.b, Table 3.2.3 |
| 3.3.2.1<br>A.5 | This change to CTS Table 4.2.1 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004. As such, this change is administrative. This change was already granted. See Amendment 144, Amendment Accession No.: ML053570161 | None | Table 4.2.1 (Rod Blocks) |
| 3.3.3.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.3.1 | 3.14, 4.14, Tables 3.14.1 and 4.14.1 |
| 3.3.3.1<br>A.2 | CTS Table 3.14.1 Required Actions A, B, and D specify the compensatory actions to take when PAM Instrumentation is inoperable. ITS 3.3.3.1 ACTIONS provide the compensatory actions for inoperable PAM Instrumentation. The ITS 3.3.3.1 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable PAM instrumentation Function. | 3.3.3.1 ACTIONS Note | Table 3.14.1 Required Actions A, B, and D |
| 3.3.3.1<br>A.3 | CTS Table 4.14.1 Note (1) states that functional tests, calibrations, and sensor checks are not required when these instruments are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an operable status. These explicit requirements are not retained in ITS 3.3.3.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.14.1 Note (1) |
| 3.3.3.1<br>A.4 | CTS Table 4.14.1 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION. ITS SR 3.3.3.1.2 requires performance of a CHANNEL CALIBRATION | SR 3.3.3.1.2 | Table 4.14.1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | | |
| 3.3.3.1<br>A.5 | CTS Table 4.14.1 Note (3), which applies to the Reactor Vessel Fuel Zone Water Level Monitor states the "Once/month sensor check will consist of verifying that the fuel zone level indicates off scale high." ITS Table 3.3.3.1-1 does not retain this detail. This changes the CTS by deleting a specific method of completing the sensor check. | None | Table 4.14.1 Note (3) |
| 3.3.3.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.3.2 | 3.13.A, 4.13.A |
| 3.3.3.2<br>A.2 | CTS 3.13.A.1 states, in part, that 12 RHR service water pump shall be OPERABLE whenever there is irradiated fuel in the vessel and water temperature is greater than 212 F. CTS 3.13.A.2 states, in part, that an inoperable 12 RHR service water pump shall be restored to OPERABLE within 7 days. ITS LCO 3.3.3.2 retains requirements for OPERABILITY of the 12 RHR service water controls associated with the Alternate Shutdown System but does not retain requirements for the OPERABILITY of the 12 RHR service water pump. This change is administrative because a new Specification, ITS LCO 3.7.1, "RHR Service Water System," has been added (ITS 3.7.1 DOC M.1) to address the OPERABILITY of the RHR Service Water System, including 12 RHR service water pump. This changes the CTS by deleting 12 RHR service water pump OPERABILITY requirements from the Alternate Shutdown System Specification. | 3.7.1 | 3.13.A.1, 3.13.A.2 |
| 3.3.3.2<br>A.3 | CTS 4.13.A.1 requires the switches on the Alternate Shutdown System be functionally tested once per "operating cycle." CTS 4.13.A.2 requires the Alternate Shutdown System panel master transfer switch to be functionally tested once per "operating cycle." ITS SR 3.3.3.2.2 requires performance of a similar test every "24 months." This changes the CTS by changing the Frequency from once per "operating cycle" to "24 months." | SR 3.3.3.2.2 | 4.13.A.1, 4.13.A.2 |
| 3.3.3.2<br>A.4 | CTS 3.13.A.1 specifies the compensatory actions to take when Alternate Shutdown System controls are inoperable. ITS 3.3.3.2 ACTIONS provide the compensatory actions for inoperable Alternate Shutdown System Functions. The ITS 3.3.3.2 ACTIONS include a Note that allows separate Condition entry for each Function. This modifies the CTS by providing a specific allowance to enter the Action for each inoperable Alternate Shutdown System Function. | 3.3.3.2 ACTIONS Note | 3.13.A.1 |
| 3.3.4.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.4.1 | 3.2.F, 4.2, Table 3.2.5, Table 4.2.1 (Recirculation Pump Trip) |
| 3.3.4.1<br>A.2 | CTS Table 3.2.5 Required Condition A requires the plant to be in Startup, Refuel, or Shutdown Mode if the Required Actions provided in Note 1 are not met. When the Required Actions and associated Conditions are not met in the ITS, ITS 3.3.4.1 | 3.3.4.1 Required Action D.2 | Table 3.2.5 Required Condition A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Required Action D.2 requires the plant to be in MODE 2. This changes the CTS by only specifying a default action to be in MODE 2 (Startup) instead of providing the option to be in the Refuel or Shutdown Mode. | | |
| 3.3.4.1<br>A.3 | CTS Table 4.2.1 Instrument Channels 1 and 2 associated with the Recirculation Pump Trip Instrumentation specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION of the transmitter. ITS SR 3.3.4.1.5 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | SR 3.3.4.1.5 | Table 4.2.1 (Recirculation Pump Trip) |
| 3.3.4.1<br>A.4 | CTS Table 4.2.1 Note (3) states that, functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. These explicit requirements are not retained in ITS 3.3.4.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.4.1<br>A.5 | CTS Table 4.2.1 Note (5) states that functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.4.1. This changes the CTS by not including these explicit requirements. | 1.0 Definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.4.1<br>A.6 | CTS 3.2.F states that the Limiting Conditions for Operation for the instrumentation listed in Table 3.2.5 shall be met. CTS Table 3.2.5 specifies the "Trip Setting" for each ATWS-RPT instrument Function. ITS LCO 3.3.4.1 requires the ATWS-RPT instrumentations for each Function to be OPERABLE and ITS SR 3.3.4.1.5 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the term "Trip Setting" with "Allowable Value." | Table 3.3.4.1-1 | Table 3.2.5 |
| 3.3.5.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.5.1 | 3.2.B, 3.2.D, 4.2, Table 3.2.2, Table 3.2.8, Table 4.2.1 (ECCS Instrumentation) |
| 3.3.5.1<br>A.2 | CTS Table 3.2.2 and CTS Table 3.2.8 specify the "Minimum No. of Operable or Operating Instrument Channels Per Trip System." ITS Table 3.3.5.1-1 specifies the "REQUIRED CHANNELS PER FUNCTION." This changes the CTS by changing the title of the "Minimum No. of Operable or Operating Instrument Channels Per Trip System" column to "REQUIRED CHANNELS PER FUNCTION." Due to this change, the number of channels required has been increased by multiplying the number of trip systems (specified in the "Minimum No. of Operable or Operating Trip Systems" column) by the number of required channels per trip system (specified in the "Minimum No. of Operable or Operating Instrument Channels Per Trip System" column). For Functions where this is not the case, a specific DOC justifying the change has been provided. However, the ADS Instrumentation has been split into two Functions; Trip System A and Trip System B instrumentation. Therefore, the number of channels required has not | Table 3.3.5.1-1 | Tables 3.2.2 and 3.2.8 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | been changed. | | |
| 3.3.5.1<br>A.3 | CTS Table 3.2.2 Functions A.1.a, A.1.c, D.2, and D.3 (Low Low Reactor Water Level and High Drywell Pressure) require four channels per trip system to be OPERABLE. CTS Table 3.2.2 Functions A.1.b.i and A.2 (Reactor Low Pressure Permissive and Low Reactor Pressure (Valve Permissive)) require two channels per trip system to be OPERABLE. For all four of these Functions, CTS Table 3.2.2 states that there are two trip systems. Furthermore, CTS Table 3.2.2 Note 4, which applies to each of these Functions, states that all instrument channels are shared by both trip systems, and CTS Table 3.2.2 Note 6, which applies to each of these Functions, states, in part, that a shared channel is considered one channel. ITS Table 3.3.5.1-1 Functions 1.a and 2.a (Reactor Vessel Water Level - Low Low) and Functions 1.b and 2.b (Drywell Pressure - High) require four channels per Function to be OPERABLE and ITS Table 3.3.5.1-1 Functions 1.c and 2.c (Reactor Steam Dome Pressure - Low (Injection Permissive) and Functions 1.d and 2.d (Reactor Steam Dome Pressure - Low (Pump Permissive)) require two channels per Function to be OPERABLE. This changes the CTS by clarifying the actual number of channels required to be OPERABLE on a per Function basis. | Table 3.3.5.1-1 Functions 1.a, 1.b, 1.c, 1.d, 2.a, 2.b, 2.c, and 2.d | Table 3.2.2 Functions A.1.a, A.1.b.i, A.1.c, A.2D.2, and D.3, Table 3.2.2 Notes 4 and 6 |
| 3.3.5.1<br>A.4 | CTS Table 4.2.1 ECCS Instrument Channel 8, Instrument Channel 10, and Instrument Channel 11 require the performance of a CHANNEL FUNCTIONAL TEST and a CHANNEL CALIBRATION at the same Frequency (Refueling Interval). ITS Table 3.3.5.1-1 Functions 1.e, 2.e, 3.d, 4.b, and 5.b only require the performance of a CHANNEL CALIBRATION at a similar Frequency. This changes the CTS by combining the current CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION testing requirements into a single Surveillance Requirement. | Table 3.3.5.1-1 Functions 1.e, 2.e, 3.d, 4.b, and 5.b | Table 4.2.1 ECCS Instrument Channels 8, 10, and 11 |
| 3.3.5.1<br>A.5 | CTS Table 4.2.1 ECCS Instrument Channels 1 and 9 specify an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement while CTS Table 4.2.1 ECCS Instrument Channels 8, 10, and 11 specify a "Refueling Interval" Frequency for both the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements. ITS SR 3.3.5.1.7 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" or "Refueling Interval" to "24 months." | SR 3.3.5.1.7 | Table 4.2.1 ECCS Instrument Channels 1, 8, 9, 10, and 11 |
| 3.3.5.1<br>A.6 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. These explicit requirements are not retained in ITS 3.3.5.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.5.1<br>A.7 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.5.1. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.3.5.1<br>A.8 | CTS 3.2.B states that the limiting conditions for operation for the instrumentation which initiates ECCS are given in Table 3.2.2. CTS Table 3.2.2 specifies the "Trip Setting" for each ECCS Function. CTS 3.2.D states that the limiting conditions for operation for the instrumentation listed in Table 3.2.8 shall be met. CTS Table 3.2.8 specifies the "Trip Setting" for HPCI actuation Functions. ITS LCO 3.3.5.1 requires the ECCS instrumentation for each Function in Table 3.3.5.1-1 to be OPERABLE and ITS Table 3.3.5.1-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the term "Trip Setting" with "Allowable Value." | Table 3.3.5.1-1 | Tables 3.2.2 and 3.2.8 |
| 3.3.5.1<br>A.9 | These changes to CTS Table 3.2.2 and CTS Table 4.2.1 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | Table 3.3.5.1-1 | Table 3.2.2 and Table 4.2.1 (ECCS Instrumentation) |
| 3.3.5.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.5.2 | 3.2.D, 3.5.D.3, 4.2, Table 3.2.8, Table 4.2.1 (ECCS Instrumentation) |
| 3.3.5.2<br>A.2 | CTS Table 3.2.8 specifies the "Minimum No. of Operable or Operating Instrument Channels Per Trip System." ITS Table 3.3.5.2-1 specifies the "REQUIRED CHANNELS PER FUNCTION." This changes the CTS by changing the title of the "Minimum No. of Operable or Operating Instrument Channels Per Trip System" column to "REQUIRED CHANNELS PER FUNCTION." | Table 3.3.5.2-1 | Table 3.2.8 |
| 3.3.5.2<br>A.3 | If one or both channels of the RCIC Reactor Vessel Water Level - High Function (CTS Table 3.2.8 Function B.1) are inoperable and the requirements of CTS Table 3.2.8 Notes 1.a and 1.b cannot be met, then Table 3.2.8 Note 1.c requires Required Condition A to be taken (since this is the Required Condition listed in Table 3.2.8 for Function B.1). Required Condition A requires compliance with CTS 3.5.A (i.e., declare RCIC inoperable and take the actions required by CTS 3.5.A). However, CTS 3.5.A provides the ECCS requirements, not the RCIC requirements. ITS 3.3.5.2 ACTION E requires the RCIC System to be declared inoperable, which will then require entry into the appropriate RCIC System ACTIONS (ITS 3.5.3). This changes the CTS by providing the correct reference to the appropriate RCIC System ACTIONS. | 3.3.5.2 ACTION E | Table 3.2.8 Required Condition A |
| 3.3.5.2<br>A.4 | CTS Table 4.2.1 ECCS Instrument Channel 8 requires the performance of a CHANNEL FUNCTIONAL TEST and a CHANNEL CALIBRATION at the same Frequency (Refueling Interval). ITS Table 3.3.5.2-1 Function 3 only requires the performance of a CHANNEL CALIBRATION at a similar Frequency. This changes the CTS by combining the current CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION testing requirements into a single Surveillance Requirement. | Table 3.3.5.2-1 Function 3 | Table 4.2.1 ECCS Instrument Channel 8 |
| 3.3.5.2<br>A.5 | CTS Table 4.2.1 for ECCS Instrument Channels 1 and 9 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement while CTS Table 4.2.1 ECCS Instrument Channel 8 specifies a "Refueling Interval" Frequency for both the CHANNEL | SR 3.3.5.2.4 | Table 4.2.1 ECCS Instrument Channels 1, 8, and 9 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | FUNCTIONAL TEST and CHANNEL CALIBRATION requirements. ITS SR 3.3.5.2.4 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" and Refueling Interval" to "24 months." | | |
| 3.3.5.2<br>A.6 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. These explicit requirements are not retained in ITS 3.3.5.2. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.5.2<br>A.7 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.5.2. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.5.2<br>A.8 | CTS 3.2.D states that the limiting conditions for operation for the instrumentation listed in Table 3.2.8 shall be met. CTS Table 3.2.8 specifies the "Trip Setting" for each RCIC Function. ITS LCO 3.3.5.2 requires the RCIC System instrumentation for each Function in Table 3.3.5.2-1 to be OPERABLE and ITS Table 3.3.5.2-1 specifies the "Allowable Value" for each Function. This changes the CTS by listing the "Trip Setting" instead of the "Allowable Value." | Table 3.3.5.2-1 | Table 3.2.8 |
| 3.3.5.2<br>A.9 | These changes to CTS Table 4.2.1 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | Table 3.3.5.2-1 | Table 4.2.1 (ECCS Instrumentation) |
| 3.3.6.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.6.1 | 3.2.A, 4.2, Table 3.2.1, Table 4.1.1, Table 4.1.2, Table 4.2.1 (Isolation Functions) |
| 3.3.6.1<br>A.2 | CTS Table 3.2.1 Function 1.b requires eight channels of High Flow in Main Steam Line Function to be OPERABLE in each trip system, while CTS Table 3.2.1 Function 1.c requires two of four channels in each of two sets of High temp in Main Steam Line Tunnel Function to be OPERABLE in each trip system. ITS Table 3.3.6.1-1 Function 1.c (Main Steam Line Flow - High) requires two channels per steam line in each trip system, while ITS Table 3.3.6.1-1 Function 1.d (Main Steam Line Tunnel Temperature - High) requires two channels per trip string in each trip system. This changes the CTS by clarifying the requirement by replacing the minimum number "8" with "2 per steam line" and by replacing the words "2 of 4 in each of 2 sets" with "2 per trip string." | Table 3.3.6.1-1 Functions 1.c and 1.d | Table 3.2.1 Functions 1.b and 1.c |
| 3.3.6.1<br>A.3 | CTS Table 3.2.1 Note (1) states that there shall be two OPERABLE "or tripped" trip systems for each function. The allowance to trip a channel (which could result in a | 3.3.6.1 ACTIONS A and B | Table 3.2.1 Note (1) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | tripped trip system) is included in the ITS 3.3.6.1 ACTIONS. This changes the CTS by deleting the statement requiring two "tripped" trip systems for each function. The detail that there are two trip systems has been relocated to the Bases as discussed in DOC LA.1. | | |
| 3.3.6.1<br>A.4 | CTS Table 3.2.1 Note (1) states that a channel may be placed in an inoperable status for up to 6 hours for required Surveillances without placing the trip system in the tripped condition provided "that at least one other operable channel in the same trip system is monitoring that parameter." ITS 3.3.6.1 Surveillance Requirements Note 2 states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided "the associated Function maintains primary containment isolation capability." This changes the CTS by replacing the words "at least one other operable channel in the same trip system is monitoring that parameter" with "the associated Function maintains primary containment isolation capability." | 3.3.6.1 Surveillance Requirements Note 2 | Table 3.2.1 Note (1) |
| 3.3.6.1<br>A.5 | If CTS Table 3.2.1 Function 1.d channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition B to be taken (since this is the Required Condition listed in Table 3.2.1 for Function 1.d). CTS Table 3.2.1 Required Condition B requires reactor power to be on IRM range or below and the reactor mode switch to be in startup, refuel, or shutdown mode. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 ACTION E requires the unit to be in MODE 2. This changes the CTS by only specifying the highest MODE that will result in the unit exiting the Applicability. | 3.3.6.1 ACTION E | Table 3.2.1 Required Condition B |
| 3.3.6.1<br>A.6 | CTS Table 3.2.1 Note ** and CTS Table 4.2.1 Note * state "Function changed from Low Reactor Water Level to Low Low Reactor Water Level following completion of design change." CTS Table 3.2.1 Note *** states "Function change from $\le$ 150,000 lb/hr, $\le$ 60 second delay, and $\le$ 300,000 lb/hr, instantaneous, isolation to $\le$ 300,000 lb/hr, $\le$ 7 second delay, isolation following completion of design change." ITS 3.3.6.1 does not include these Notes. This changes the CTS by deleting the Notes. | None | Table 3.2.1 Notes ** and ***, Table 4.2.1 Note *, |
| 3.3.6.1<br>A.7 | CTS Table 4.2.1 Main Steam Line Isolation Instrument Channel Function 1 specifies "Refueling Interval" Frequency for both the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION requirements. CTS Table 4.2.1 Main Steam Line Isolation Function 4 and RWCU Isolation Functions 1 and 2 specify an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirements. CTS Table 4.1.2 Instrument Channel 5 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement. ITS SR 3.3.6.1.5 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from "Operating Cycle" and "Refueling Interval" to "24 months." | SR 3.3.6.1.5 | Table 4.1.2 Instrument Channel 5, Table 4.2.1 MSL Isolation Instrument Channels 1 and 4, Table 4.2.1 RWCU Isolation instrument Channels 1 and 2 |
| 3.3.6.1<br>A.8 | CTS Table 4.2.1 Main Steam Line Isolation Instrument Channel 1 requires the performance of a CHANNEL FUNCTIONAL TEST and a CHANNEL CALIBRATION at the same Frequency (Refueling Interval). ITS Table 3.3.6.1-1 Function 1.d only requires the performance of a CHANNEL CALIBRATION (ITS SR 3.3.6.1.5) at a similar | Table 3.3.6.1-1 Function 1.d | Table 4.2.1 MSL Isolation Instrument Channel 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Frequency. This changes the CTS by combining the current CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION testing requirements into a single Surveillance Requirement. | | |
| 3.3.6.1<br>A.9 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. CTS Table 4.1.1 Note 4 includes a similar allowance for the functional test and CTS Table 4.1.2 Note 2 includes a similar allowance for the calibration test. These explicit requirements are not retained in ITS 3.3.6.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.1.1 Note 4, Table 4.1.2 Note 2. Table 4.2.1 Note (3) |
| 3.3.6.1<br>A.10 | CTS Table 4.2.1 Note (5) and CTS Table 4.1.1 Note 5 state that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.6.1. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.1.1 Note 5, Table 4.2.1 Note (5) |
| 3.3.6.1<br>A.11 | CTS Table 4.2.1 Note (12) states that calibration of instrument channels with resistance temperature detector (RTD) or thermocouples sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. These explicit requirements are not retained in ITS 3.3.6.1. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL CALIBRATION | Table 4.2.1 Note (12) |
| 3.3.6.1<br>A.12 | CTS Table 3.2.1 Required Condition F requires the High Pressure Coolant Injection (HPCI) steam line to be isolated and includes a statement to see Specification 3.5 for additional requirements. Specification 3.5 includes requirements for inoperable Emergency Core Cooling Systems including HPCI. ITS 3.3.6.1 ACTION F does not include this cross reference to the ECCS requirements. This changes the CTS by deleting a cross-reference to the System Specification. | None | Table 3.2.1 Required Condition F |
| 3.3.6.1<br>A.13 | CTS 3.2.A states that the limiting conditions for operation for the instrumentation that initiates primary containment isolation are given in Table 3.2.1. CTS Table 3.2.1 specifies the "Trip Settings" for each primary containment isolation Function. ITS LCO 3.3.6.1 requires the primary containment isolation instrumentation for each Function in Table 3.3.6.1-1 to be OPERABLE and ITS Table 3.3.6.1-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the term "Trip Settings" with "Allowable Value." | Table 3.3.6.1-1 | Table 3.2.1 |
| 3.3.6.1<br>A.14 | These changes to CTS Table 4.2.1 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | Table 3.3.6.1-1 | Table 4.2.1 (Isolation Functions) |
| 3.3.6.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, | 3.3.6.2 | 3.2.E, 4.2, Table 3.2.4, Table 4.1.1, Table 4.1.2, Table 4.2.1 (Reactor Building Ventilation and |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
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| | BWR/4" (ISTS). | | SGT System) |
| 3.3.6.2<br>A.2 | CTS Table 3.2.4 Note (1) states that there shall be two operable "or tripped" trip systems for each function. The allowance to trip a channel (which could result in a tripped trip system) is included in the ITS 3.3.6.2 ACTIONS. This changes the CTS by deleting the statement requiring two "tripped" trip systems for each function. The detail that there are two trip systems has been relocated to the Bases in accordance with DOC LA.1. | 3.3.6.2 ACTIONS A and B | Table 3.2.4 Note (1) |
| 3.3.6.2<br>A.3 | CTS Table 3.2.4 Note (1) states that a channel may be placed in an inoperable status for up to 6 hours for performance of required Surveillances without placing the trip system in the tripped condition provided "that at least one other OPERABLE channel in the same Trip System is monitoring that parameter." ITS 3.3.6.2 Surveillance Requirements Note 2 states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided "the associated Function maintains secondary containment isolation capability." This changes the CTS by replacing the words "at least one other OPERABLE channel in the same Trip System is monitoring that parameter" with "the associated Function maintains secondary containment isolation capability." | 3.3.6.2 Surveillance Requirements Note 2 | Table 3.2.4 Note (1) |
| 3.3.6.2<br>A.4 | CTS Table 3.2.4 Note (2) provides Actions for inoperable instrumentation channels. When the minimum number of OPERABLE channels is less than required for a given Function, the action must be taken within the specified time for each individual channel. This CTS Action does not limit the number of Functions to which this Action can simultaneously apply. ITS 3.3.6.2 ACTIONS Note states "Separate Condition entry is allowed for each channel." This changes the CTS by adding an explicit Note for separate condition entry for each channel. | 3.3.6.2 ACTIONS Note | Table 3.2.4 Note (2) |
| 3.3.6.2<br>A.5 | CTS Table 3.2.4 Note (2)(a)2) requires the Function 3 or 4 inoperable channels to be placed in the downscale trip condition or to place the trip system in the tripped condition. ITS 3.3.6.2 ACTION A requires the placement of the channel in trip. This changes the CTS by replacing the wording to place the "inoperable Channel in a downscale trip condition, or place the Trip System in the tripped condition" to place "channel in trip." | 3.3.6.2 ACTION A | Table 3.2.4 Note (2)(a)2) |
| 3.3.6.2<br>A.6 | CTS Table 4.2.1 Instrument Channel Function 1 associated with the Reactor Building Ventilation and Standby Gas Treatment specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement. ITS SR 3.3.6.2.5 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | SR 3.3.6.2.5 | Table 4.2.1 Reactor Building Ventilation and SGT System Instrument Channel 1 |
| 3.3.6.2<br>A.7 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. CTS Table 4.1.1 Note 4 includes a similar allowance for the functional test and CTS Table 4.1.2 Note 2 includes a similar allowance for the calibration test. These explicit requirements are not retained in ITS 3.3.6.2. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.1.1 Note 4, Table 4.1.2 Note 2, Table 4.2.1 Note (3) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.3.6.2<br>A.8 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.6.2. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.6.2<br>A.9 | CTS 3.2.E states that the limiting conditions for operation for the instrumentation listed in Table 3.2.4 shall be met. CTS Table 3.2.4 specifies the "Trip Settings" for each secondary containment isolation instrumentation Function. ITS LCO 3.3.6.2 requires the secondary containment isolation instrumentation for each Function in Table 3.3.6.2-1 to be OPERABLE and ITS Table 3.3.6.2-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the term "Trip Settings" with "Allowable Value." | Table 3.3.6.2-1 | Table 3.2.4 |
| 3.3.6.2<br>A.10 | These changes to CTS Table 3.2.4 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-023, from Thomas J. Palmisano (NMC) to USNRC, dated April 29, 2004. As such, these changes are administrative. | Table 3.3.6.2-1 | Table 3.2.4 |
| 3.3.6.2<br>A.11 | CTS 3.2.E requires secondary containment isolation instrumentation Functions listed in Table 3.2.4 to be OPERABLE whenever the secondary containment integrity is required as specified in CTS 3.7.C. CTS Table 3.2.4 requires each secondary containment isolation Function to be OPERABLE during the conditions specified in Table 3.2.4. ITS Table 3.3.6.2.1-1 requires the secondary containment isolation Functions to be OPERABLE at the same conditions specified in CTS Table 3.2.4. This changes the CTS by deleting the statement in CTS 3.2.E regarding the Applicability of the secondary containment isolation Functions. | Table 3.3.6.2-1 | 3.2.E |
| 3.3.6.2<br>A.12 | This change to CTS Table 4.2.1 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | Table 3.3.6.2-1 | Table 4.2.1 |
| 3.3.6.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.6.3 | 3.2.H, 3.6.E.1, 4.2, Table 3.2.7, Table 4.2.1 (S/RV LLS Logic), Table 4.14.1 (S/RV Position (Pressure Switch) Function) |
| 3.3.6.3<br>A.2 | CTS Table 3.2.7 requires 2 channels of each Function for each trip system and also states that there are two trip systems for each Function. Furthermore, CTS Table 3.2.7 Note (2) states that each LLS valve is provided with two trip systems. ITS Table 3.3.6.3-1 requires 4 channels per LLS valve for each Function. This changes the CTS by changing the channel requirements for each Function from 2 channels per trip system for 2 trip systems to 4 channels per valve. | Table 3.3.6.3-1 | Table 3.2.7 including Note (2) |
| 3.3.6.3 | CTS Table 4.2.1 S/RV LLS Logic Instrument Channels 2 and 3 specifies an "Operating | SR 3.3.6.3.5 | Table 4.2.1 S/RV LLS |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.3 | Cycle" Frequency for the CHANNEL CALIBRATION requirement and CTS Table 4.14.1 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement of the S/RV Position (Pressure Switch) Function. ITS SR 3.3.6.3.5 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | | Logic Instrument Channels 2 and 3, Table 4.14.1 (S/RV Position (Pressure Switch) Function) |
| 3.3.6.3<br>A.4 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be operable or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an operable status. These explicit requirements are not retained in ITS 3.3.6.3. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.6.3<br>A.5 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.6.3. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.6.3<br>A.6 | CTS 3.2.H states that the limiting conditions for operation for the instrumentation listed in Table 3.2.7 shall be met. CTS Table 3.2.7 specifies the "Trip Setting" for each LLS isolation instrumentation Function. ITS LCO 3.3.6.3 requires the LLS instrumentation for each Function in Table 3.3.6.3-1 to be OPERABLE and ITS Table 3.3.6.3-1 specifies the "Allowable Value" for each LLS instrumentation Function. This changes the CTS by replacing the term "Trip Setting" with "Allowable Value." | Table 3.3.6.3-1 | Table 3.2.7 |
| 3.3.6.3<br>A.7 | CTS Table 4.14.1 Note (1) states that functional tests, calibrations, and sensor checks are not required when these instruments are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an operable status. These explicit requirements are not retained in ITS 3.3.6.3. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.14.1 Note (1) |
| 3.3.6.3<br>A.8 | These changes to CTS Table 3.2.7 and CTS Table 4.2.1 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004. As such, this change is administrative. This change was already granted. See Amendment 144, Amendment Accession No.: ML053570161 | Table 3.3.6.3-1 | Table 3.2.7, Table 4.2.1 (S/RV LLS Logic) |
| 3.3.7.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.7.1 | 3.2.I, 4.2, Table 3.2.9, Table 4.2.1 (Control Room Habitability Protection) |
| 3.3.7.1<br>A.2 | CTS Table 3.2.9 Note (1) allows, in part, an instrument channel to be bypassed for testing for up to 8 hours. ITS 3.3.7.1 Surveillance Requirements Note provides a similar allowance, but limits the allowance to only when the Control Room Radiation - High Function maintains CREF initiation capability. This changes the CTS by explicitly stating | 3.3.7.1 Surveillance Requirements Note | Table 3.2.9 Note (1) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | that the 8 hour allowance can only be used if the other Control Room Radiation - High channel is OPERABLE. | | |
| 3.3.7.1<br>A.3 | CTS Table 3.2.9 Required Condition A or B applies each time a radiation channel is inoperable. This CTS Action does not limit the number of channels to which this Action can simultaneously apply. ITS 3.3.7.1 ACTIONS Note states "Separate Condition entry is allowed for each channel." This changes the CTS by adding an explicit Note for separate condition entry for each channel. | 3.3.7.1 ACTIONS Note | Table 3.2.9 Required Conditions A and B |
| 3.3.7.1<br>A.4 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be operable or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an operable status. These explicit requirements are not retained in ITS 3.3.7.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.7.1<br>A.5 | CTS Table 4.2.1 Note (5) states that a functional test of this instrument means the injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response, alarm, and/or initiating action. These explicit requirements are not retained in ITS 3.3.7.1. This changes the CTS by not including these explicit requirements. | 1.0 definition of CHANNEL FUNCTIONAL TEST | Table 4.2.1 Note (5) |
| 3.3.7.1<br>A.6 | CTS 3.2.I.1 states that the Limiting Conditions for Operation for the radiation Instrumentation listed in Table 3.2.9 shall be met. CTS Table 3.2.9 specifies the "Trip Settings" for the CREF System Function. ITS LCO 3.3.7.1 requires one channel per trip system for the Control Room Air Inlet Radiation - High Function to be OPERABLE and ITS SR 3.3.7.1.3 specifies the "Allowable Value" for this Function. This changes the CTS by replacing the term "Trip Settings" with "Allowable Value." | SR 3.3.7.1.3 | Table 3.2.9 |
| 3.3.7.1<br>A.7 | This change to CTS Table 4.2.1 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.3.7.1.3 | Table 4.2.1 (Control Room Habitability Protection) |
| 3.3.8.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.8.1 | 3.2.G, 4.2, Table 3.2.2 Function D, Table 3.2.6, Table 4.2.1 (Safeguards Bus Voltage) |
| 3.3.8.1<br>A.2 | CTS Table 3.2.6 specifies the "Minimum No. of Operable or Operating Instrument Channels Per Trip System." ITS Table 3.3.8.1-1 only specifies the "REQUIRED CHANNELS PER BUS." This changes the CTS by changing the title of the "Minimum No. of Operable or Operating Instrument Channels Per Trip System" column to "REQUIRED CHANNELS PER BUS" and changing the number of channels for the Loss of Voltage channels from "2" to "4." | Table 3.3.8.1-1 | Table 3.2.6 |
| 3.3.8.1<br>A.3 | CTS Table 3.2.6 Note (1) provides the Action for inoperable required instrumentation channels. When the minimum number of OPERABLE channels is less than required for | 3.3.8.1 ACTIONS Note | Table 3.2.6 Note (1) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | a given Function, the appropriate channels or systems must be placed in the tripped condition or the plant must be in cold shutdown within 24 hours. This CTS Action does not limit the number of Functions or channels to which this Action can simultaneously apply. ITS 3.3.8.1 ACTIONS Note states "Separate Condition entry is allowed for each channel." This changes the CTS by adding an explicit Note for separate condition entry for each channel. | | |
| 3.3.8.1<br>A.4 | CTS Table 4.2.1 Safeguards Bus Voltage Instrument Channel 2 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION requirement. ITS SR 3.3.8.1.3 requires the performance of a CHANNEL CALIBRATION every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | SR 3.3.8.1.3 | Table 4.2.1 Safeguards Bus Voltage Instrument Channel 2 |
| 3.3.8.1<br>A.5 | CTS Table 4.2.1 Note (3) states that functional tests, calibrations, and sensor checks are not required when the systems are not required to be OPERABLE or are tripped. In addition, the Note states that if tests are missed, they shall be performed prior to returning the systems to an OPERABLE status. These explicit requirements are not retained in ITS 3.3.8.1. This changes the CTS by not including these explicit requirements. | SR 3.0.1 | Table 4.2.1 Note (3) |
| 3.3.8.1<br>A.6 | CTS 3.2.G states that the Limiting Conditions for Operation for the Instrumentation listed in Table 3.2.6 shall be met. CTS Table 3.2.6 specifies the "Trip Setting" for each LOP Instrumentation Function. ITS LCO 3.3.8.1 requires the LOP instrumentations for each Function in Table 3.3.8.1-1 to be OPERABLE and ITS Table 3.3.8.1-1 specifies the "Allowable Value" for each Function. This changes the CTS by replacing the term "Trip Setting" with "Allowable Value." | Table 3.3.8.1-1 | Table 3.2.6 |
| 3.3.8.1<br>A.7 | This change to CTS Table 3.2.6 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | Table 3.3.8.1-1 | Table 3.2.6 |
| 3.3.8.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.3.8.2 | 3.1.C, 4.1.C |
| 3.3.8.2<br>A.2 | CTS 3.1.C.1 does not specify when the RPS electric power monitoring assemblies are required to be OPERABLE. ITS 3.3.8.2 requires the RPS electric power monitoring assemblies to be OPERABLE in MODES 1, 2, and 3, MODES 4 and 5 with residual heat removal (RHR) shutdown cooling (SDC) suction isolation valves open, MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, during movement of recently irradiated fuel assemblies in the secondary containment, and during OPDRVs. This changes the CTS by specifying explicitly when the RPS electric power monitoring assemblies are required to be OPERABLE. | 3.3.8.2 Applicability | 3.1.C.1 |
| 3.3.8.2 | CTS 3.1.C.2 and CTS 3.1.C.3 provide the option of either restoring the inoperable RPS | 3.3.8.2 Required Actions | 3.1.C.2, 3.1.C.3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.3 | electric power monitoring channels to OPERABLE status or removing the associated RPS MG set or alternate power supply from service. ITS 3.3.8.2 Required Actions A.1 and B.1 require the associated inservice power supply(s) to be removed from service. This changes the CTS by deleting the explicit allowance to restore the RPS electric power monitoring channels to OPERABLE status. | A.1 and B.1 | |
| 3.3.8.2<br>A.4 | CTS 4.1.C.2 specifies an "Operating Cycle" Frequency for the CHANNEL CALIBRATION of the RPS electric power monitoring channels. ITS SR 3.3.8.2.3 requires the performance of a CHANNEL CALIBRATION of each overvoltage, undervoltage, and underfrequency time delay relay every "24 months." This changes the CTS by changing the Frequency from once each "Operating Cycle" to "24 months." | SR 3.3.8.2.3 | 4.1.C.2 |
| 3.3.8.2<br>A.5 | CTS 3.1.C.1 requires RPS electric power monitoring assemblies to be OPERABLE and specifies the "setpoints" for the overvoltage, undervoltage, and underfrequency Functions. ITS LCO 3.3.8.2 requires the RPS electric power monitoring assemblies to be OPERABLE and ITS SR 3.3.8.2.2 and SR 3.3.8.2.3 specify the "Allowable Value" for each Function. This changes the CTS by replacing the term "setpoints" with "Allowable Value." | SR 3.3.8.2.2, SR 3.3.8.2.3 | 3.1.C.1 |
| 3.4.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.1 | 3/4.5.F |
| 3.4.1<br>A.2 | CTS 3.5.F.3.a.3 requires the Average Power Range Monitor (APRM) Rod Block setpoints to be adjusted if single recirculation loop operation is entered. ITS 3.4.1 does not include this requirement. This changes the CTS by deleting the requirement to adjust the APRM Rod Block setpoints when single recirculation loop operation is entered. The requirements for the APRM Rod Block have been relocated to the Technical Requirements Manual (TRM), as described in the Discussion of Changes in ITS 3.3.2.1. Therefore, a reference to this requirement in the ITS is not necessary. Any required changes to the APRM Rod Block setpoints will be controlled in accordance with changes to the TRM. As such, since the Specification has been relocated, the deletion of this specific requirement, which is simply a cross-reference to the affected Specification, is acceptable. This change is designated as administrative because it does not result in any technical changes to the CTS. | None | 3.5.F.3.a.3 |
| 3.4.1<br>A.3 | CTS 3.5.F.4.a requires compliance with CTS 3.6.A.2 and CTS 3.5.F.3 for one recirculation loop in operation. ITS 3.4.1 does not include this cross reference to other requirements. This changes the CTS by deleting references to other TS requirements. | None | 3.5.F.4.a |
| 3.4.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.2 | 3/4.6.G |
| 3.4.2 | When the jet pump requirements of CTS 3.6.G are not met, CTS 3.6.G requires the unit | 3.4.2 ACTION A | 3.6.G |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.2 | to be in cold shutdown (MODE 4). ITS 3.4.2 ACTION A only requires a shutdown to MODE 3. This changes the CTS by stating the unit must be in shutdown to MODE 3 instead of to MODE 4. The purpose of CTS 3.6.G, in part, is to place the unit in a condition in which the jet pumps are not required to be OPERABLE. CTS 3.6.G requires the jet pumps to be OPERABLE in the Run mode (i.e., MODE 1). Thus, while the CTS Action requires a shutdown to MODE 4, in actuality, only a shutdown to MODE 2 is required. Once MODE 2 is achieved, continuation to MODE 4 is not required since the jet pumps are not required OPERABLE in MODES other then MODE 1. However, since the requirement that the jet pumps be OPERABLE in MODE 2 has been added (DOC M.1), ITS 3.4.2 ACTION A includes a shutdown to MODE 3. This change is acceptable because MODE 3 is outside the Applicability of the proposed Specification. Therefore, this change is considered a presentation preference change with the deletion of MODES 3 and 4 being made to be consistent with the actual CTS LCO statement and the inclusion of MODE 3 being made to be consistent with the change discussed in DOC M.1. As such, this change is considered an administrative change. | | |
| 3.4.2<br>A.3 | CTS 4.6.G.1 states that the jet pump OPERABILITY Surveillance must be performed by "recording" jet pump loop flows, recirculation pump flows, recirculation pump speeds, and individual jet pump D/P. ITS SR 3.4.2.1 does not include this requirement to record the stated parameters. This changes the CTS by deleting the explicit requirements to record the unit parameters. The purpose of CTS 4.6.G.1 is to verify jet pump OPERABILITY. This change is acceptable because this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records): maintain records of activities affecting quality, including the results of tests (i.e., Technical Specification Surveillances). Compliance with 10 CFR 50 Appendix B is required by the Monticello Operating License. The details of the regulations within the Technical Specifications are repetitious and unnecessary. Therefore, retaining the requirement to perform the associated Surveillances and eliminating the details from Technical Specifications that are found in 10 CFR 50 Appendix B is considered a presentation preference. As such, this change is considered an administrative change. | None | 4.6.G.1 |
| 3.4.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.3 | 3/4.6.E |
| 3.4.3<br>A.2 | CTS 3.6.E.1 includes a cross reference to other Specifications "(note: Low-Low Set and ADS requirements are located in Specification 3.2.H and 3.5.A, respectively)," that govern additional requirements associated with the S/RVs. CTS 4.6.E.2 includes a cross reference to Surveillance Requirements in CTS Table 4.2.1 associated with the Low-Low Set logic. These cross references to other Specifications or Surveillance Requirements are not included in ITS 3.4.3. This changes the CTS by deleting the cross reference to other Specification requirements. | None | 3.6.E.1, 4.6.E.2 |
| 3.4.3 | CTS 3.6.E.1 states, in part, that "seven" S/RVs are required to be OPERABLE. | LCO 3.4.3, SR 3.4.3.1 | 3.6.E.1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.3 | However, CTS 3.6.E.1 also states that "8" valves shall be set within the prescribed limits. ITS LCO 3.4.3 requires "seven" valves to be OPERABLE and ITS SR 3.4.3.1 requires the verification that the safety function lift setpoints of the "required" S/RVs are within limits. This changes the CTS by only requiring the "required" valves to be set to the prescribed limits. | | |
| 3.4.3<br>A.4 | These changes to CTS 4.6.E.1.a and CTS 4.6.E.1.b are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | SR 3.4.3.1 | 4.6.E.1.a, 4.6.E.1.b |
| 3.4.4<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.4 | 3/4.6.D.1 |
| 3.4.5<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.5 | 3/4.6.D.2 |
| 3.4.5<br>A.2 | CTS 4.6.D.2.b requires a CHANNEL FUNCTIONAL TEST of the required leakage detection instrumentation (flow instruments only) and footnote ** states "A functional test of this instrument means injection of a simulated signal into the instrument (not primary sensor) to verify the proper instrument channel response alarm and/or initiating action." ITS SR 3.4.5.2 requires the performance of a CHANNEL FUNCTIONAL TEST, but the footnote words are not included. This changes the CTS by deleting the modifying words of the footnote. | None | 4.6.D.2.b |
| 3.4.5<br>A.3 | CTS 4.6.D.2.a requires a CHANNEL CALIBRATION of the primary containment atmosphere particulate monitoring system at least once per operating cycle. CTS 4.6.D.2.b requires a CHANNEL CALIBRATION of the required leakage detection instrumentation at least once per operating cycle. ITS SR 3.4.5.3 requires similar tests every "24 months." This changes the CTS by changing the Frequencies from once per "operating cycle" to "24 months." | SR 3.4.5.3 | 4.6.D.2.a, 4.6.D.2.b |
| 3.4.5<br>A.4 | CTS 3.6.D.2.a allows 30 days to restore the inoperable drywell floor drain sump monitoring system to OPERABLE status. CTS 3.6.D.2.b allows the plant to operate continuously when the drywell particulate radioactivity monitoring system is inoperable as long as grab samples of the primary containment atmosphere are analyzed every 12 hours. CTS 3.6.D.2.a and CTS 3.6.D.2.b both include a footnote * that states, "A mode change is allowed when this system is inoperable." ITS 3.4.5 ACTION A covers the condition when LCO 3.4.5.a is not met (i.e., both the drywell floor drain sump monitoring system and the drywell equipment drain sump monitoring system are inoperable), and requires LCO 3.4.5.a to be met in 30 days. A Note is also included that states | 3.4.5 Required Action A.1 | 3.6.D.2.a and 3.6.D.2.b footnote * |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | LCO 3.0.4.c is applicable. ITS 3.4.5 ACTION B covers the condition for when the drywell particulate radioactivity monitoring system is inoperable, and requires a grab sample to be analyzed every 12 hours. However, it does not include a Note similar to the ACTION A Note. This changes the CTS by deleting the modifying words of the footnote for the drywell particulate radioactivity monitoring system. Other changes to CTS 3.4.6.D.2.a are discussed in DOC A.5. | | |
| 3.4.5<br>A.5 | CTS 3.6.D.2.a requires the drywell floor drain sump monitoring system to be OPERABLE. CTS 3.6.D.2.a.1) covers the condition for an inoperable drywell floor drain sump monitoring system and it allows 30 days to restore the inoperable drywell floor drain sump monitoring system to OPERABLE status. CTS 3.6.D.2.c covers the condition for all channels of both systems (drywell floor drain sump monitoring system and drywell particulate radioactivity monitoring system) inoperable. ITS LCO 3.4.5.a requires either the drywell floor drain sump monitoring system or the drywell equipment drain sump monitoring system with the drywell floor drain sump overflowing into the drywell equipment drain sump system. ITS 3.4.5 ACTION A covers the condition when LCO 3.4.5.a is not met, and requires LCO 3.4.5.a to be satisfied. ITS 3.4.5 ACTION C covers the condition when all "required" leakage detection systems are inoperable. This changes the CTS by providing the option to allow the drywell equipment drain sump monitoring system with the drywell floor drain sump overflowing into the drywell equipment drain sump system to be used instead of the drywell floor drain monitoring system and adjusts the Actions, as required. The NRC has previously stated, "An alternate to the drywell floor drain pump monitoring system is the drywell equipment drain sump monitoring system, provided the floor drain sump is overflowing to the equipment drain sump. The system becomes inoperable during periods when the floor drain sump level and flow indications are not capable of being monitored. Once the drywell floor drain sump is overflowing to the equipment drain sump, NMC can use the drywell equipment drain sump monitoring system to quantify leakage (i.e., unidentified leakage) into the floor drain sump. This alternate method gives added flexibility, and safety is not reduced because unidentified leakage is still being monitored and indicated in the control room. Therefore, the NRC staff finds the proposed changes acceptable." See Issuance of Amendment Re: Drywell Leakage and Sump Monitoring Detection System (Tac No. Mb7945) Dated August 21, 2003 (ML031980275). | 3.4.5 ACTION A | 3.6.D.2.a, 3.6.D.2.a.1), 3.6.D.2.c |
| 3.4.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.6 | 3/4.6.C.1, 3.6.C.4 |
| 3.4.9<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.4.9 | 3/4.6.A, 3/4.6.B |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.4.9<br>A.2 | CTS 3.6.A.1 includes a limit for average rate of reactor coolant temperature change during normal heatup and cooldown. CTS 3.6.A.2 includes a limit for the differential temperature between an idle recirculation loop and the reactor coolant temperature prior to an idle recirculation loop startup. CTS 3.6.B includes limitations on the reactor vessel temperature and pressure during various plant conditions. ITS LCO 3.4.9 states "RCS pressure, RCS temperature, RCS heatup and cooldown rates, and the recirculation pump starting temperature requirements shall be maintained within limits" and includes an Applicability of "At all times." The applicable limits are included in the Surveillance Requirements associated with ITS 3.4.9. This changes the CTS by combining the requirements of CTS 3.6.A.1, CTS 3.6.A.2, and CTS 3.6.B in one LCO, including the limits in the Surveillance Requirements, and providing an Applicability. | 3.4.9 | 3.6.A.1, 3.6.A.2, 3.6.B |
| 3.4.9<br>A.3 | CTS 3.6.B.2 states that P/T limits of Figure 3.6.3 are applicable during a heatup by non-nuclear means "(except with the reactor vessel vented)" and CTS 3.6.B.3 states that P/T limits of Figure 3.6.4 are applicable during all operation with a critical core "other than...at times when the reactor vessel is vented." ITS LCO 3.4.9 and SRs 3.4.9.1 and 3.4.9.2 are applicable even when the reactor vessel is vented. This changes the CTS by requiring the applicable P/T limits to be met when the reactor vessel is vented. | LCO 3.4.9 Applicability, SR 3.4.9.1, SR 3.4.9.2 | 3.6.B.2, 3.6.B.3 |
| 3.4.9<br>A.4 | CTS 4.6.A requires various RCS temperatures to be "recorded" during heatup and cooldowns. CTS 4.6.B.1 requires various RCS temperatures to be "recorded" during the inservice hydrostatic or leak testing. ITS SR 3.4.9.1 requires a verification that the RCS pressure and temperature and heatup and cooldown rates are within the applicable limits. This changes the CTS by deleting the specific requirement to "record" the temperatures. | SR 3.4.9.1 | 4.6.A, 4.6.B.1 |
| 3/4.6.H<br>A.1 | These changes to CTS 4.6.H.1, CTS 4.6.H.3, and CTS 4.6.H.6 are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, these changes are administrative. | None | 4.6.H.1, 4.6.H.3, 4.6.H.6 |
| 3/4.6.C.2,<br>3/4.6.C.3,<br>3/4.6.C.4<br>A.1 | CTS Figure 4.6.2 provides an illustration of the chloride stress corrosion test results of stressed 304 stainless steel specimens. This figure is not included in the ITS. This changes the CTS by deleting Figure 4.6.2. | None | Figure 4.6.2 |
| 3.5.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.5.1 | 3/4.5.A, 3/4.5.B |
| 3.5.1<br>A.2 | CTS 3.5.A.3.d specifies a condition for one of the two LPCI injection paths being inoperable while CTS 3.5.A.3.e specifies a condition for two RHR pumps being inoperable. Both CTS 3.5.A.3.d and CTS 3.5.A.3.e allow 7 days to restore the associated inoperabilities before requiring a unit shutdown. ITS 3.5.1 ACTION B (first Condition) provides the actions for one LPCI subsystem inoperable while ITS 3.5.1 | 3.5.1 ACTIONS B and C | 3.5.A.3.d, 3.5.A.3.e |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ACTION C provides the actions for one LPCI pump in each subsystem being inoperable. Both of the ACTIONS also allow a 7 day restoration time. This changes the CTS by specifying the LPCI inoperabilities with respect to a LPCI "subsystem" instead of LPCI "injection path" or "RHR pumps." | | |
| 3.5.1<br>A.3 | CTS 4.5.A.3.b requires the low pressure HPCI pump flow test to be performed once per operating cycle. CTS 4.5.A.4 requires the performance of an automatic actuation test of the CS, LPCI, HPCI, and ADS Systems each operating cycle. CTS 4.5.A.4 also requires the cycling of each ADS valve and observing a compensatory turbine bypass or control valve position each operating cycle. ITS SR 3.5.1.9, SR 3.5.1.10, SR 3.5.1.11, and SR 3.5.1.12 require similar tests every "24 months." This changes the CTS by changing the Frequencies from once per "operating cycle" to "24 months." | SR 3.5.1.9, SR 3.5.1.10, SR 3.5.1.11 | 4.5.A.3.b, 4.5.A.4 |
| 3.5.1<br>A.4 | CTS 4.5.A.4 requires the performance of a simulated automatic actuation test of the ECCS subsystems. ITS SR 3.5.1.10 requires the performance of a similar test for the ECCS injection/spray subsystems, however a Note has been included that states "Vessel injection/spray may be excluded." ITS SR 3.5.1.11 requires the performance of a similar test for the ADS, however a Note has been included that states "Valve actuation may be excluded." This changes the CTS by providing clarification Notes that exclude vessel injection/spray for the ECCS injection/spray subsystems and valve actuation for the ADS. | SR 3.5.1.10 Note, SR 3.5.1.11 Note | 4.5.A.4 |
| 3.5.1<br>A.5 | The ITS 3.5.1 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to HPCI. The CTS does not include this Note. This changes the CTS by including the ACTION Note. | 3.5.1 ACTIONS Note | None |
| 3.5.1<br>A.6 | CTS 3.5.B.2 states that if one RHR intertie return line isolation valve is inoperable to either close the inoperable valve or close the other return line isolation valve and the RHR suction line isolation valve. No specific time is provided to complete this action. However, if the requirement in CTS 3.5.B.2 cannot be met, CTS 3.5.B.3 requires the reactor to be taken out of the Run mode within 24 hours. ITS 3.5.1 ACTION F covers the condition for inoperable RHR intertie return line isolation valve(s) in MODE 1 and requires isolation of the RHR intertie line within 18 hours. ITS 3.5.1 ACTION G covers the condition when ACTION F is not met and it requires the unit to be in MODE 2 within 6 hours. This changes the CTS by dividing the completion time in CTS 3.5.B.3 into two specific times; one time to isolate the RHR intertie line and one time to be in MODE 2. Other changes to CTS 3.5.B.2 (relative to how to isolate the RHR intertie line) are discussed in DOC LA.5. | 3.5.1 ACTIONS F and G | 3.5.B.2, 3.5.B.3 |
| 3.5.1<br>A.7 | This change to CTS 4.5.A.4 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.5.1.10,<br>SR 3.5.1.11 | 4.5.A.4 |
| 3.5.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency | 3.5.2 | 3.5.E.1, 3.5.E.2, 3.7.A.1, 3.7.A.1.e, 3.7.A.1.f, 4.7.A.1.e |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | |
| 3.5.2<br>A.2 | CTS 3.5.E.1 and 3.5.E.2, in part, require low pressure ECCS subsystems to be OPERABLE during OPDRVs. While no actions are specified if a low pressure ECCS subsystem becomes inoperable during OPDRVS, it is implicit that OPDRVs would have to be suspended. ITS 3.5.2 ACTION B and Required Action C.1, which cover the condition of one inoperable low pressure ECCS subsystem and two inoperable ECCS subsystems, respectively, require immediate action to be taken to suspend OPDRVs. This changes the CTS by clearly stating to suspend OPDRVS. Other changes to the implicit CTS actions are described in DOCs M.1 and L.1. | 3.5.2 ACTION B, 3.5.2 Required Action C.1 | 3.5.E.1, 3.5.E.2 |
| 3.5.2<br>A.3 | CTS 3.7.A.1.e requires suppression pool water level to be ≥ - 4.0 and ≤ +3.0 inches. ITS SR 3.5.2.1.a requires the suppression pool water level to be ≥ - 3 ft. This changes the CTS by not including the upper suppression pool water level limit during shutdown conditions. The change to the lower limit is discussed in DOC L.7. | SR 3.5.2.1.a | 3.7.A.1.e |
| 3.5.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.5.3 | 3/4.5.D |
| 3.5.3<br>A.2 | The ITS 3.5.3 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to RCIC. The CTS does not include this Note. This changes the CTS by including the ACTION Note. | 3.5.3 ACTIONS Note | None |
| 3.5.3<br>A.3 | CTS 4.5.D.1.b requires the low pressure RCIC pump flow test to be performed once per operating cycle. CTS 4.5.D.2 requires the performance of an automatic actuation test of the RCIC System each refueling interval. ITS SR 3.5.3.3 and SR 3.5.3.4 require similar tests every "24 months." This changes the CTS by changing the Frequencies from once per "operating cycle" and each "refueling interval" to "24 months." | SR 3.5.3.3, SR 3.5.3.4 | 4.5.D.1.b, 4.5.D.2 |
| 3.5.3<br>A.4 | CTS 4.5.D.2 requires the performance of a simulated automatic actuation test of the RCIC System. ITS SR 3.5.3.4 requires the performance of a similar test however, a Note has been included that states "Vessel injection may be excluded." This changes the CTS by providing a clarification Note that excludes vessel injection for the RCIC System. | SR 3.5.3.4 Note | 4.5.D.2 |
| 3.5.3<br>A.5 | This change to CTS 4.5.D.2 is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.5.3.4 | 4.5.D.2 |
| 3.6.1.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.1.1 | 3.7.A.2.a.(1), 3.7.A.2.a.(4), 4.7.A.1.d, 4.7.A.2.a, 4.7.A.2.d, 4.7.A.4.a.(2), 1.0.P |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.6.1.1<br>A.2 | CTS 3.7.A.2.a.(1) references the CTS Section 1.0 Primary Containment Integrity definition. ITS does not use this terminology; it requires the primary containment to be OPERABLE. This changes the CTS by deleting the reference to Primary Containment Integrity and replaces it with a requirement for the primary containment to be OPERABLE. | LCO 3.6.1.1, ACTION A | 3.7.A.2.a.(1), 3.7.A.2.a.(4), 4.7.A.2 |
| 3.6.1.1<br>A.3 | CTS 4.7.A.4.a.(2) requires the drywell to suppression chamber leakage to be demonstrated "once per operating cycle." ITS SR 3.6.1.1.2 requires performance of a similar test every "24 months." This changes the CTS by changing the Frequency from "Once each operating cycle" to "24 months." | SR 3.6.1.1.2 | 4.7.A.4.a.(2) |
| 3.6.1.1<br>A.4 | This change to CTS 4.7.A.1.c is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.6.1.1.1 | 4.7.A.1.c |
| 3.6.1.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.1.2 | 3.7.A.3.c, 4.7.A.3.c.(1), 4.7.A.3.c.(2), 1.0.P |
| 3.6.1.2<br>A.2 | ITS 3.6.1.2 ACTIONS Note 2 states "Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when air lock leakage results in exceeding overall primary containment leakage rate acceptance criteria." This requirement is not specifically stated in the CTS. This changes the CTS by explicitly requiring the Primary Containment Actions be entered when the Primary Containment LCO is not met as a result of air lock leakage exceeding limits. | 3.6.1.2.ACYIONS Note 2 | None |
| 3.6.1.2<br>A.3 | CTS 3.7.A.3.c requires the primary containment air lock to be OPERABLE whenever the Primary Containment Integrity is required. ITS LCO 3.6.1.2 requires the primary containment air lock to be OPERABLE during MODES 1, 2, 3. This changes the CTS by deleting a cross reference to the Primary Containment Integrity Applicability and replacing it with the specific Applicability for the primary containment air lock. | 3.6.1.2 Applicability | 3.7.A.3.c |
| 3.6.1.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.1.3 | 3.7.D, 3.7.A.2.a.(1), 3.7.A.2.a.(4), 4.7.D, 1.0.P |
| 3.6.1.3<br>A.2 | CTS 3.7.D.1 includes the requirements for the "automatic" PCIVs. CTS 3.7.A.2.a.(1) includes the requirements for all "manual" PCIVs since the CTS definition of Primary Containment Integrity includes these valves. ITS LCO 3.6.1.3 includes the requirements for both types of PCIVs. This changes the CTS by combining the requirements for all PCIVs in one LCO statement. | LCO 3.6.1.3 | 3.7.D.1, 3.7.A.2.a(1) |
| 3.6.1.3<br>A.3 | CTS 3.7.D.1 includes all requirements for "automatic" PCIVs, except for reactor building-to-suppression chamber vacuum breakers, which are covered under CTS 3.7.A.3. ITS | LCO 3.6.1.3 | 3.7.D.1, 3.7.A.3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | 3.6.1.3 also includes requirements for automatic PCIVs, but the specific exclusion statement of, "except reactor building-to-suppression chamber vacuum breakers," is included in the ITS LCO 3.6.1.3 statement. This changes the CTS by adding a specific exclusion statement concerning the reactor building-to-suppression chamber vacuum breakers. | | |
| 3.6.1.3<br>A.4 | CTS 3.7.D.2.a provides requirements to be taken for one or more penetration flow paths with one PCIV inoperable while CTS 3.7.D.2.b provides requirements to be taken for one or more penetration flow paths with two PCIVs inoperable. ITS 3.6.1.3 includes an explicit Note (ACTIONS Note 2) that provides instructions for the proper application of the ACTIONS for ITS compliance (i.e., Separate Condition entry is allowed for each penetration flow path). This changes the CTS by providing explicit direction as to how to utilize the ACTIONS when a PCIV is inoperable. | 3.6.1.3 ACTIONS Note 2 | 3.7.D.2.a, 3.7.D.2.b |
| 3.6.1.3<br>A.5 | CTS 3.7.D does not specifically require Conditions to be entered for systems supported by inoperable containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.1.3 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs." ITS LCO 3.0.6 provides an exception to ITS LCO 3.0.2, stating "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." This changes the CTS by adding a specific statement to require supported system Conditions and Required Actions be entered, whereas in the CTS this would be done without the Note. | 3.6.1.3 ACTIONS Note 3 | None |
| 3.6.1.3<br>A.6 | CTS 3.7.D does not include a reference to entering applicable Conditions and Actions of the Primary Containment Integrity LCO (CTS 3.7.A.2) (changed to Primary Containment OPERABILITY in the ITS). ITS 3.6.1.3 ACTIONS Note 4 states "Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria." This changes the CTS by explicitly stating an existing requirement that the Primary Containment Specification ACTIONS be taken when the Primary Containment LCO is not met as a result of PCIV leakage exceeding limits. | 3.6.1.3 ACTIONS Note 4 | None |
| 3.6.1.3<br>A.7 | CTS 4.7.D.1.a requires the OPERABLE automatic PCIVs to be tested once per operating cycle. CTS 4.7.D.1.b requires the primary system instrument line flow check valves to be tested once per operating cycle. ITS SR 3.6.1.3.5 requires verification of automatic PCIV isolation time, except for main steam isolation valves (MSIVs), every "24 months," while ITS SR 3.6.1.3.6 requires the verification of MSIV isolation time every "24 months." ITS SR 3.6.1.3.7 requires verification every "24 months" that each automatic PCIV actuates to the isolation position on an isolation signal. ITS SR 3.6.1.3.8 requires verification every "24 months" that each excess flow check valve actuates on a simulated instrument line break to restrict flow to $\leq$ 2 gpm. This changes the CTS by changing the Frequency from "operating cycle" to "24 months." | SR 3.6.1.3.5,<br>SR 3.6.1.3.6,<br>SR 3.6.1.3.7,<br>SR 3.6.1.3.8 | 4.7.D.1.a, 4.7.D.1.b |
| 3.6.1.3 | CTS 4.7.D.1.b requires each primary system instrument line excess flow check valve | SR 3.6.1.3.8 | 4.7.D.1.b |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.8 | (EFCVs) to be tested for proper operation. Per the CTS Bases, the OPERABILITY requirements are specified in a letter from L. O. Mayer (Northern States Power) to J. F. O'Leary (NRC) dated July 27, 1973. This letter requires the valves to limit leakage to a maximum of 2 gpm. ITS SR 3.6.1.3.8 requires the verification that the reactor instrumentation line EFCV actuates on a simulated instrument line break to restrict flow to ≤ 2 gpm. This changes the CTS by specifying the leakage limit for the individual EFCVs. | | |
| 3.6.1.3<br>A.9 | CTS 3.7.D.2.a requires restoring the inoperable valve to OPERABLE status within 4 hours, 8 hours, or 72 hours (based on the kind of valve) or requires at least one valve in each line having an inoperable valve to be deactivated in the isolated condition. CTS 3.7.D.2.b requires restoring the inoperable valves to OPERABLE status within 1 hour or requires at least one valve in each line having inoperable valves to be deactivated in the isolated condition. CTS 3.7.D.3.b requires restoring the inoperable valve(s) to within leakage limits within 24 hours or requires at least one valve in each line having a purge and vent valve not within leakage limits to be deactivated in the isolated position. The ITS 3.6.1.3 ACTIONS do not include the specific option to restore the valve(s) to OPERABLE status or restore leakage to within leakage limits, but includes other compensatory Required Actions to take within 1 hour, 4 hours, 8 hours, or 72 hours, as applicable. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status or to within leakage limits. | None | 3.7.D.2.a, 3.7.D.2.b, 3.7.D.3.b |
| 3.6.1.3<br>A.10 | CTS 4.7.D.2 and CTS 4.7.D.3 require the position of the deactivated and isolated valves or the isolation device(s) to be "recorded." ITS 3.6.1.3 Required Actions A.2, C.2, and D.2 only include the requirement to "verify" the applicable valve is "closed." This changes the CTS by deleting the specific requirement to "record" the valve position. | 3.6.1.3 Required Actions A.2, C.2, and D.2 | 4.7.D.2, 4.7.D.3 |
| 3.6.1.3<br>A.11 | CTS 4.7.D.4 discusses the periodic Type C leakage testing of the 18 inch primary containment purge and vent valves (which is required by CTS 4.7.A.2.a). ITS SR 3.6.1.3.11 requires the performance of leakage rate testing for each 18 inch primary containment purge and vent valve with resilient seals in accordance with the Primary Containment Leakage Testing Program. This changes the CTS by stating to perform leakage rate testing for each 18 inch primary containment purge and vent valve in accordance with the Primary Containment Leakage Testing Program. | SR 3.6.1.3.11 | 4.7.D.4 |
| 3.6.1.3<br>A.12 | CTS 1.0.P definition of Primary Containment Integrity states, in part, that all automatic containment isolation valves are OPERABLE "or are deactivated in the closed position or at least one valve in each line having an inoperable valve is closed." CTS 3.7.D.1 requires all primary containment automatic isolation valves to be OPERABLE and CTS 3.7.D.2 and CTS 3.7.D.3 provide the actions that must be taken when the valves are not OPERABLE, and include similar requirements as are in the CTS 1.0.P definition. ITS LCO 3.6.1.3 requires all PCIVs to be OPERABLE and the appropriate compensatory actions for PCIVs are included in the ITS 3.6.1.3 ACTIONS. This changes the CTS by deleting the explicit CTS Primary Containment Integrity definition for when an automatic containment isolation valve is not OPERABLE. | None | 1.0.P |
| 3.6.1.5 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant | 3.6.1.5 | 3.2.H, Table 3.2-7, |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.1 | specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | | 3.6.E.1 |
| 3.6.1.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.1.6 | 3.7.A.3, 4.7.A.3.a |
| 3.6.1.6<br>A.2 | CTS 3.7.A.3.a requires "two" reactor building-to-suppression chamber vacuum breakers to be OPERABLE. ITS LCO 3.6.1.6 requires "each" reactor building-to-suppression chamber vacuum breakers to be OPERABLE. This changes the CTS by using the term "each" instead of the actual number of vacuum breakers. | LCO 3.6.1.6 | 3.7.A.3.a |
| 3.6.1.7<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.1.7 | 3.7.A.4, 4.7.A.4, Figure 3.7.1 |
| 3.6.1.7<br>A.2 | CTS 4.7.A.4.a.(4) requires the opening setpoint of the vacuum breakers to be tested once each "operating cycle." ITS SR 3.6.1.7.3 requires a similar verification every "24 months", that each vacuum breaker opening setpoint is less than or equal to 0.5 psid. This changes the CTS by changing the Frequency from "operating cycle" to "24 months." | SR 3.6.1.7.3 | 4.7.A.4.a.(4) |
| 3.6.1.8<br>A.1 | CTS 3.7.A.2.a.(2) states that the Primary Containment Integrity is not required when performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t). The ITS does not include this allowance. This changes the CTS by deleting the allowance to not require Primary Containment Integrity (changed to Primary Containment OPERABILITY as described in DOC A.2) during certain low power physics tests. | 3.6.1.8 | 3.5.C.1, 3.5.C.2, 3.5.C.3, 4.5.C.1 |
| 3.6.1.8<br>A.2 | CTS 3.5.C.1 Footnote *, which states "For allowed out of service times for the RHR pumps see Section 3.5.A," is a cross reference to another Specification that provides additional requirements associated with the RHR pumps. This cross reference is not included in ITS 3.6.1.8. This changes the CTS by deleting the cross reference to other Specification requirements. | None | 3.5.C.1 Footnote * |
| 3.6.2.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.2.1 | 3.7.A.1, 3.7.A.1.a, 3.7.A.1.b, 3.7.A.1.c, 3.7.A.1.d, 3.7.A.1.f, 4.7.A.1.a, 4.7.A.1.b, 4.7.A.1.d |
| 3.6.2.1<br>A.2 | CTS 3.7.A.1.a requires water temperature to be $\leq$ 90°F during the condition of normal operation. ITS 3.6.2.1 restates this condition as THERMAL POWER > 1% RTP. This changes the CTS by restating the term normal operation in a more specific form used in | LCO 3.6.2.1.a | 3.7.A.1.a |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | the ITS. | | |
| 3.6.2.1<br>A.3 | Whenever there is indication of relief valve operation that adds heat to the suppression pool, CTS 4.7.A.1.b requires the suppression pool temperature be continuously monitored and also observed and logged every 5 minutes until the heat addition is terminated. Under similar conditions (as modified by DOC M.5), ITS SR 3.6.2.1.1 requires the suppression pool temperature to be verified (which is analogous to observed) to be within the applicable limit once per 5 minutes. This changes the CTS by deleting the requirements to continuously monitor and log the suppression pool temperature. The logging requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance records to maintain records of activities affecting quality, including the results of tests (i.e., Technical Specification Surveillances). | SR 3.6.2.1.1 | 4.7.A.1.b |
| 3.6.2.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.2.2 | 3.7.A.1, 3.7.A.1.e, 3.7.A.1.f, 4.7.A.1.e |
| 3.6.2.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.2.3 | 3.5.C.1, 3.5.C.2, 3.5.C.3, 4.5.C.1 |
| 3.6.2.3<br>A.2 | CTS 3.5.C.1 Footnote *, which states "For allowed out of service times for the RHR pumps see Section 3.5.A," is a cross reference to another Specification that provides additional requirements associated with the RHR pumps. This cross reference is not included in ITS 3.6.2.3. This changes the CTS by deleting the cross reference to other Specification requirements. | None | 3.5.C.1 Footnote * |
| 3.6.3.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.3.1 | 3.7.A.5, 4.7.A.5 |
| 3.6.3.1<br>A.2 | CTS 4.7.A.5 states that whenever inerting is required, the primary containment oxygen concentration shall be measured and recorded on a weekly basis. Under similar conditions, ITS SR 3.6.3.1.1 requires a verification that the primary containment oxygen concentration is within limits, but does not include this requirement to record the primary containment oxygen concentration. This changes the CTS by deleting the explicit requirement to record the primary containment oxygen concentration. | SR 3.6.1.3.1 | 4.7.A.5 |
| 3.6.4.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, | 3.6.4.1 | 3.7.C.1, 3.7.C.2, 3.7.C.4, 4.7.C.1.a, 1.0.W |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | BWR/4" (ISTS). | | |
| 3.6.4.1<br>A.2 | CTS 3.7.C.1 requires the Secondary Containment Integrity to be maintained and CTS 1.0.W and CTS 3.7.C.2 use the term Secondary Containment Integrity. ITS LCO 3.6.4.1 requires the secondary containment to be OPERABLE. This changes the CTS by deleting the specific Secondary Containment Integrity term and replacing it with a requirement for the secondary containment to be OPERABLE. | LCO 3.6.4.1 | 3.7.C.1, 3.7.C.2, 1.0.W |
| 3.6.4.1<br>A.3 | CTS 3.7.C.1 specifies requirements for the secondary containment during "all modes of plant operation." However, CTS 3.7.C.2 states that secondary containment is not required "when all of the listed conditions are satisfied," and provides a list of six conditions (CTS 3.7.C.2.a through f). ITS LCO 3.6.4.1 specifies requirements for the secondary containment in the positive sense (when the secondary containment is required to be OPERABLE). This changes the CTS by specifying the requirements for the secondary containment when it is required to be OPERABLE instead of when it is not required to be OPERABLE. Changes to the list of six conditions is discussed in DOCs M.1 and L.1. | LCO 3.6.4.1 | 3.7.C.1, 3.7.C.2 |
| 3.6.4.1<br>A.4 | CTS 4.7.C.1.a requires the secondary containment capability test to be performed at "each refueling interval." ITS SR 3.6.4.1.4 requires this same test, however it is required to be performed every "24 months." This changes the CTS by changing the Frequency from "each refueling interval" to "24 months." | SR 3.6.4.1.4 | 4.7.C.1.a |
| 3.6.4.1<br>A.5 | CTS 3.7.C.4.b requires the unit to suspend handling of recently irradiated fuel. ITS 3.6.4.1 ACTION C includes the same requirement, however, ITS 3.6.4.1 Required Action C.1 includes a Note that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | 3.6.4.1 Required Action C.1 Note | 3.7.C.4.b |
| 3.6.4.1<br>A.6 | These changes to CTS 3.7.C.2.c, CTS 3.7.C.2.d, and CTS 3.7.C.4, and the addition of CTS 3.7.C.2.d and e are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.6.4.1 | 3.7.C.2.c, 3.7.C.2.d, 3.7.C.4, 3.7.C.2.d, 3.7.C.2.e |
| 3.6.4.1<br>A.7 | This change to CTS 4.7.C.1.a is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.6.4.1.4 | 4.7.C.1.a |
| 3.6.4.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.4.2 | 3.7.C.1, 3.7.C.2, 3.7.C.3, 3.7.C.4, 3.7.C.5,4.7.C.1.b, 1.0.W |
| 3.6.4.2<br>A.2 | CTS 3.7.C.1 requires the Secondary Containment Integrity to be maintained and CTS 3.7.C.2 uses the term Secondary Containment Integrity. CTS 1.0.W, the Secondary Containment Integrity definition, in part, states that the reactor building is closed. This definition is interpreted to mean that all secondary containment penetrations are closed | LCO 3.6.4.2 | 3.7.C.1, 3.7.C.2, 1.0.W |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | (i.e., penetrations including manual valves and are required to be closed during accident conditions). CTS 1.0.W.3 also requires all reactor building ventilation system automatic valves to be OPERABLE. ITS LCO 3.6.4.2 requires the Secondary Containment Isolation Valves (SCIVs) to be OPERABLE. This changes the CTS by including the requirements for SCIVs (i.e., manual valves, blind flanges, and reactor building automatic valves) in a separate Specification. | | |
| 3.6.4.2<br>A.3 | CTS 3.7.C.1 specifies requirements for the secondary containment during "all modes of plant operation." However, CTS 3.7.C.2 states that secondary containment is not required "when all of the listed conditions are satisfied," and provides a list of six conditions (CTS 3.7.C.2.a through f). ITS LCO 3.6.4.2 specifies requirements for the secondary containment isolation valves in the positive sense (when the secondary containment isolation valves are required to be OPERABLE). This changes the CTS by specifying the requirements for the secondary containment isolation valves when they are required to be OPERABLE instead of when they are not required to be OPERABLE. | LCO 3.6.4.2 | 3.7.C.1, 3.7.C.2 |
| 3.6.4.2<br>A.4 | CTS 3.7.C.3 provides requirements to be taken for one or more penetration flow paths with a SCIV inoperable. ITS 3.6.4.2 includes an explicit Note (ACTIONS Note 2) that provides instructions for the proper application of the ACTIONS for ITS compliance (i.e., Separate Condition entry is allowed for each penetration flow path). This changes the CTS by providing explicit direction as to how to utilize the ACTIONS when a SCIV is inoperable. | 3.6.4.2 ACTIONS Note 2 | 3.7.C.3 |
| 3.6.4.2<br>A.5 | CTS 3.7.C.3 does not specifically require Conditions to be entered for systems supported by inoperable secondary containment isolation valves. OPERABILITY of supported systems is addressed through the definition of OPERABILITY for each system, and appropriate LCO Actions are taken. ITS 3.6.4.2 ACTIONS Note 3 states "Enter applicable Conditions and Required Actions for systems made inoperable by SCIVs." ITS LCO 3.0.6 provides an exception to ITS LCO 3.0.2, stating "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered." This changes the CTS by adding a specific statement to require supported system Conditions and Required Actions be entered, whereas in the CTS this would be done without the Note. | 3.6.4.2 ACTIONS Note 3 | None |
| 3.6.4.2<br>A.6 | CTS 3.7.C.3 requires restoring the inoperable damper to OPERABLE status or isolating the affected duct by use of a closed damper or blind flange within eight hours. ITS 3.6.4.2 ACTIONS do not include the specific option to restore the valves to OPERABLE status, but includes other compensatory Required Actions to take within 8 hours. This changes the CTS by not explicitly stating the requirement to restore an inoperable valve to OPERABLE status. | None | 3.7.C.3 |
| 3.6.4.2<br>A.7 | CTS 3.7.C.3 states the actions that must be taken when the reactor building ventilation system automatic isolation dampers (valves) are not OPERABLE and requires the valves to be isolated by a closed damper or blind flange. In addition, CTS 1.0.W.3 requires all reactor building ventilation system automatic isolation valves to be OPERABLE or "secured in the closed position." ITS 3.6.4.2 ACTION A covers | 3.6.4.2 ACTION A | 3.7.C.3, 1.0.W.3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
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| | inoperabilities associated with these penetrations and requires the affected penetration flow path to be isolated by use of at least one closed "and de-activated automatic valve," closed manual valve, or blind flange. This changes the CTS by incorporating the explicit CTS definition statement concerning the option to have the penetration "secured in the closed position" into ITS 3.6.4.2 ACTION A. The change that allows use of a manual valve is discussed in DOC L.4. | | |
| 3.6.4.2<br>A.8 | CTS 4.7.C.1.b.(1) requires verification that each automatic damper actuates to its isolation position "each refueling interval." ITS SR 3.6.4.2.3 requires a similar test every "24 months." This changes the CTS by changing the Frequency from "refueling interval" to "24 months." | SR 3.6.4.2.3 | 4.7.C.1.b.(1) |
| 3.6.4.2<br>A.9 | CTS 3.7.C.4.b.2 requires the unit to suspend handling of recently irradiated fuel. ITS 3.6.4.2 ACTION D includes the same requirement, however ITS 3.6.4.2 Required Action D.1 includes a Note that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | 3.6.4.2 Required Action D.1 Note | 3.7.C.4.b.2 |
| 3.6.4.2<br>A.10 | These changes to CTS 3.7.C.2.c, CTS 3.7.C.2.d, and CTS 3.7.C.4, and the addition of CTS 3.7.C.2.d and e are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.6.4.2 | 3.7.C.2.c, 3.7.C.2.d, 3.7.C.4, 3.7.C.2.d, 3.7.C.2.e |
| 3.6.4.2<br>A.11 | This change to CTS 4.7.C.1.b.(1) is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.6.4.2.3 | 4.7.C.1.b.(1) |
| 3.6.4.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.6.4.3 | 3.7.B.1, 3.7.B.2.c, 4.7.B.1, 4.7.B.2.d, 1.0.W |
| 3.6.4.3<br>A.2 | CTS 3.7.B.1 requires the SGT System to be OPERABLE whenever the secondary containment integrity is required and CTS 3.7.B.1.a references the conditions of CTS 3.7.C.2.(a) through (f). ITS LCO 3.6.4.3 requires the SGT System to be OPERABLE during MODES 1, 2, and 3, during movement of recently irradiated fuel assemblies in the secondary containment, and during operations with a potential for draining the reactor vessel (OPDRVs). This changes the CTS by deleting a cross reference to the secondary containment Applicability and replacing it with the specific Applicability for the SGT System. | LCO 3.6.4.3 Applicability | 3.7.B.1, 3.7.B.1.a |
| 3.6.4.3<br>A.3 | CTS 3.7.B.1.c.2)(b)(1) and 3.7.B.1.d state to immediately suspend movement of recently irradiated fuel assemblies in the secondary containment. ITS 3.6.4.3 ACTIONS C and E include the same requirement, however a Note has been added that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | 3.6.4.3 ACTIONS C and E Note | 3.7.B.1.c.2)(b)(1), 3.7.B.1.d |
| 3.6.4.3 | CTS 3/4.7.B.2 specifies the performance requirements for the SGT subsystems while | SR 3.6.4.3.2 | 3/4.B.2, 3/4.B.3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.4 | CTS 3/4.7.B.3 specifies the post maintenance requirements for the SGT subsystems. ITS 3.6.4.3.2 requires the performance of the required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 3/4.7.B does not include a VFTP, but the requirements that make up the VFTP are being moved to ITS 5.5. This changes CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5. | | |
| 3.6.4.3<br>A.5 | CTS 4.7.B.2.d requires verification of automatic initiation of each SGT subsystem each "operating cycle." ITS SR 3.6.4.3.3 requires this same test however it is required to be performed every "24 months." This changes the CTS by changing the Frequency from "operating cycle" to "24 months." | SR 3.6.4.3.3 | 4.7.B.2.d |
| 3.6.4.3<br>A.6 | CTS 3.7.B.1 allows one SGT subsystem to be inoperable with reactor water temperature $\geq$ 212˚F for 7 days "provided that all active components in the other standby gas treatment system are operable." ITS 3.6.4.3 does not explicitly state this requirement in the ACTION for one inoperable SGT subsystem. This changes the CTS by deleting a provision to when the 7 day allowed outage time is applicable. | None | 3.7.B.1 |
| 3.6.4.3<br>A.7 | These changes to CTS 3.7.B.1, CTS 3.7.B.1.a, and CTS 3.7.B.1.b, and the addition of CTS 3.7.B.1.c and d are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | 3.6.4.3 | 3.7.B.1, 3.7.B.1.a, 3.7.B.1.b, 3.7.B.1.c, 3.7.B.1.d |
| 3.6.4.3<br>A.8 | This change to CTS 4.7.B.2.c is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.6.4.3.3 | 4.7.B.2.c |
| 3.7.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.7.1 | 3.5.C |
| 3.7.4<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.7.4 | 3.17.B.1, 3.17.B.2.c.(3), 4.17.B.1, 4.17.B.2.c, 4.17.B.2.c.(3) |
| 3.7.4<br>A.2 | CTS 4.17.B.1 states to operate each CREF subsystem for at least 10 hours with the heaters "operable." ITS SR 3.7.4.1 requires the CREF System to operate with the heaters "operating." This changes the CTS by requiring the CREF heaters to be "operating" in lieu of being "operable" during the test. | SR 3.7.4.1 | 4.17.B.1 |
| 3.7.4<br>A.3 | Under certain conditions, CTS 3.17.B.1.c and 3.17.B.1.d, in part, require the immediate suspension of movement of recently irradiated fuel assemblies in the secondary containment. ITS 3.7.4 ACTIONS D and F include the same requirement, however a | 3.7.4 ACTIONS D and F Note | 3.17.B.1.c, 3.17.B.1.d |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Note has been added that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | | |
| 3.7.4<br>A.4 | CTS 3/4.17.B.2 specifies the performance requirements for the CREF subsystems while CTS 3/4.17.B.3 specifies the post maintenance requirements for the CREF subsystems. ITS SR 3.7.4.2 requires the performance of the required CREF filter testing in accordance with the Ventilation Filter Testing Program (VFTP). CTS 3/4.17.B does not include a VFTP, but the requirements that make up the program are being moved to ITS 5.5. This changes the CTS by requiring testing in accordance with the VFTP, whose requirements are being moved to ITS 5.5. | SR 3.7.4.2 | 3/4.17.B.2, 3/4.17.B.3 |
| 3.7.4<br>A.5 | CTS 4.17.B.2.c requires verification of the OPERABILITY of each CREF subsystem each "operating cycle." ITS SR 3.7.4.3 and ITS SR 3.7.4.4 require the same testing however the Surveillances are required to be performed every "24 months." This changes the CTS by changing the Frequency from "operating cycle" to "24 months." | SR 3.7.4.3, SR 3.7.4.4 | 4.17.B.2.c |
| 3.7.4<br>A.6 | These changes to CTS 3.17.B.1, CTS 3.17.B.1.c, and CTS 3.17.B.1.d are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-023, from Thomas J. Palmisano (NMC) to USNRC, dated April 29, 2004. As such, these changes are administrative. | 3.7.4 Applicability, 3.7.4 ACTIONS A and F | 3.17.B.1, 3.17.B.1.c, 3.17.B.1.d |
| 3.7.4<br>A.7 | This change to CTS 4.17.B.2.c is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.7.4.3, SR 3.7.4.4 | 4.17.B.2.c |
| 3.7.5<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.7.5 | 3.17.A, 4.17.A |
| 3.7.5<br>A.2 | Under certain conditions, CTS 3.17.A.2.c and CTS 3.17.A.3.c, in part, require immediate suspension of movement of irradiated fuel assemblies in the secondary containment. ITS 3.7.5 ACTIONS C and E include the same requirement, however a Note has been added that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | 3.7.5 ACTIONS C and E Note | 3.17.A.2.c, 3.17.A.3.c |
| 3.7.5<br>A.3 | These changes to CTS 3.17.A.1, CTS 3.17.A.2.c, and CTS 3.17.A.3.c are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval in NMC letter L-MT-04-023, from Thomas J. Palmisano (NMC) to USNRC, dated April 29, 2004. As such, these changes are administrative. | 3.7.5 Applicability, 3.7.5 ACTIONS C and E | 3.17.A.1, 3.17.A.2.c, 3.17.A.3.c |
| 3.7.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, | 3.7.6 | 3.8.A, 4.8.A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | BWR/4" (ISTS). | | |
| 3.7.6<br>A.2 | CTS 3.8.A.1 requires the main condenser offgas activity to be within limit "Whenever the Steam Jet Air Ejectors (SJAEs) are in operation." CTS 4.8.A requires the main condenser offgas activity Surveillance to be performed "after the SJAEs are in operation." ITS LCO 3.7.6 also requires the main condenser offgas activity to be within limit, however the Applicability is MODE 1, and MODES 2 and 3 with any main steam line not isolated and steam jet air ejector (SJAE) in operation. ITS SR 3.7.6.1 includes the same Surveillance requirement to verify the main condenser offgas activity, however a Note has been included that requires the Surveillance to be performed "after any main steam line is not isolated and SJAE in operation." This changes the CTS by clarifying that the LCO is always applicable in MODE 1, and only in MODES 2 and 3 when any main steam line is opened and a SJAE is in operation, and also allows the Surveillance to be performed only after both a main steam line is opened and a SJAE is in service. | 3.7.6 Applicability | 3.8.A.1, 4.8.A |
| 3.7.8<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.7.8 | 3.10.C, 4.10.C |
| 3.7.8<br>A.2 | These changes to CTS 3.10.C and CTS 4.10.C are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palmisano (NMC) to USNRC, dated April 12, 2005. As such, these changes are administrative. | LCO 3.7.8, 3.7.8 Applicability, SR 3.7.8.1 | 3.10.C, 4.10.C |
| 3.7.8<br>A.3 | Under certain conditions, CTS 3.10.C, in part, requires immediate suspension of movement of irradiated fuel assemblies. ITS 3.7.8 ACTION A includes the same requirement, however a Note has been added that states that LCO 3.0.3 is not applicable. This changes the CTS by adding this Note. | 3.7.8 ACTION A | 3.10.C |
| 3.7.8<br>A.4 | CTS 4.10.C.2 requires verification that the spent fuel storage pool water level is within limit once every 7 days when irradiated fuel assemblies are stored in the spent fuel storage pool. This Surveillance is not included in ITS 3.7.8. This changes the CTS by deleting this Surveillance. | None | 4.10.C.2 |
| 3.8.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.8.1 | 3.9.A, 3.9.B, 4.9.A, 4.9.B, 1.0.L |
| 3.8.1<br>A.2 | The ITS 3.8.1 ACTIONS include a Note that states LCO 3.0.4.b is not applicable to the emergency diesel generators (EDGs). The CTS does not include this Note. This changes the CTS by including the ACTION Note. | 3.8.1 ACTIONS Note | None |
| 3.8.1<br>A.3 | CTS 4.9.B.3.a.1) requires, in part, a manual start of the EDGs while CTS 4.9.B.3.a.2) requires verification of EDG performance when simulating a loss of offsite power in conjunction with an Emergency Core Cooling System (ECCS) actuation test signal. ITS SR 3.8.1.2 also requires the EDGs to be started similar to CTS 4.9.B.3.a.1), however it | SR 3.8.1.2 Note 1, SR 3.8.1.12 Note 1 | None |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | includes a Note (Note 1) that states all EDG starts may be preceded by an engine prelube period and followed by a warmup period prior to loading. ITS SR 3.8.1.12 requires verification of EDG performance during the actual or simulated conditions of a loss of coolant accident (LOCA) and loss of offsite power, however it includes a Note (Note 1) that states all EDG starts may be preceded by an engine prelube period. This changes the CTS by adding Notes allowing a prelube period and a Note allowing a warmup period to the applicable Surveillance Requirements. | | |
| 3.8.1<br>A.4 | CTS 4.9.B.3.a.1) requires, in part, a manual start of the EDGs. ITS SR 3.8.1.2 also requires the EDGs to be started, however it includes a Note (Note 2) that states the a modified EDG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. This changes the CTS by adding the Note to the Surveillance Requirement. | SR 3.8.1.2 Note 2 | None |
| 3.8.1<br>A.5 | CTS 4.9.B.3.a.1) requires, in part, that each EDG be loaded for ³ 60 minutes. ITS SR 3.8.1.3 requires a similar test, however it includes a Note (Note 1) that states the EDG loading may include gradual loading as recommended by the manufacturer, and a Note (Note 4) that states this SR shall be preceded by and immediately follow, without shutdown, a successful performance of SR 3.8.1.2. This changes the CTS by adding Notes to allow gradual loading and require the EDG loading test to immediately follow the EDG start test. | SR 3.8.1.3 Notes 1 and 4 | None |
| 3.8.1<br>A.6 | CTS 4.9.B.3.a.2) requires the simulation of a loss of offsite power in conjunction with an ECCS actuation signal test to be performed once each operating cycle. ITS SR 3.8.1.12 requires a similar test every "24 months." This changes the CTS by changing the Frequency from once per "Operating Cycle" to "24 months." | SR 3.8.1.12 | 4.9.B.3.a.2) |
| 3.8.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.8.3 | 3.9.B.3.b, 3.9.B.3.c, 4.9.B.3.b, 4.9.B.3.c |
| 3.8.3<br>A.2 | CTS 3.9.B.3.b specifies requirements for diesel oil stored in the diesel oil storage tank. CTS 3.9.B.3.c specified requirements for the emergency diesel generator (EDG) air starting receivers. CTS 3.9.B.3.b and CTS 3.9.B.3.c state that these requirements are required to consider the associated EDG to be OPERABLE. ITS LCO 3.8.3 states, in part, that the stored diesel fuel oil and starting air subsystems shall be within limits for each required EDG. The Applicability for this requirement is when associated EDG is required to be OPERABLE. This changes the CTS by combining the requirements for diesel fuel oil and starting air into one Specification. | LCO 3.8.3, including Applicability | 3.9.B.3.b, 3.9.B.3.c |
| 3.8.3<br>A.3 | CTS 3.9.B.3.c.1), CTS 3.9.B.3.c.2), and CTS 3.9.B.c.3) specify the compensatory actions to take when the starting air pressure is not within limits for the associated EDG. ITS ACTIONS E, F, and G specify similar compensatory actions under the same condition. However, ITS 3.8.3 ACTIONS Note has been added and allows separate Condition entry for each EDG. This changes the CTS by explicitly stating that the Actions are to be taken separately for each required EDG. | 3.8.3 ACTIONS Note | 3.9.B.3.c.1), 3.9.B.3.c.2), 3.9.B.3.c.3) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.8.3<br>A.4 | CTS 4.9.B.3.b.3) specifies a requirement to sample the diesel fuel and check for quality once a month. ITS SR 3.8.3.3 requires the verification that fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program. This changes CTS by requiring testing in accordance with the Diesel Fuel Oil Testing Program, whose requirements are being moved to ITS 5.5.8. | SR 3.8.3.3 | 4.9.B.3.b.3) |
| 3.8.4<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.8.4 | 3.9.A, 3.9.A.4, 3.9.B, 3.9.B.4, 3.9.B.5, 4.9.B.4, 4.9.B.5 |
| 3.8.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.8.6 | 3.9.A, 3.9.A.4, 3.9.B, 3.9.B.4, 4.9.B.4 |
| 3.8.6<br>A.2 | CTS 3.9.A does not allow the reactor to be made critical unless the requirements in CTS 3.9.A.4 are met. CTS 3.9.A.4, in part, requires the 125 VDC and 250 VDC batteries to be charged and in service and the associated battery chargers to be OPERABLE. Thus, the battery parameter requirements are covered by this LCO statement. ITS 3.8.6 requires the battery parameters associated with the 125 VDC and 250 VDC batteries to be within limits whenever the associated DC electrical power subsystems are required to be OPERABLE. The requirements for the batteries and chargers are included in ITS 3.8.4 and ITS 3.8.5. This changes the CTS by dividing the requirements for the battery and the requirements for battery parameters into two separate Specifications, and specifies the Applicability of the Battery Parameter requirements to be the same as the DC Sources they support. | 3.8.6, including Applicability | 3.9.A, 3.9.A.4 |
| 3.8.6<br>A.3 | CTS 4.9.B.4.c requires the "rated load discharge test" (i.e., a "performance discharge test" in the ITS) to be performed, but it does not provide any restrictions for when the test may be performed. ITS SR 3.8.6.6 requires the same test, however a Note to SR 3.8.6.6 specifies that this Surveillance shall not normally be performed in MODE 1, 2, or 3. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the unit is maintained or enhanced. In addition, the Note further states that credit may be taken for unplanned events that satisfy the SR. This changes the CTS by adding a specific restriction as to when the Surveillance can be performed. Currently, this Surveillance would not normally be performed while operating (i.e., MODES 1, 2, and 3), since performing this Surveillance would result in the inoperability of the associated battery, and the Actions require a plant shutdown if the battery is inoperable. The ITS Note clearly presents the current practice on when the test may be performed and the allowance of the current practice of taking credit for unplanned events, provided the necessary data is obtained. This change is designated as administrative because it does not result in technical | SR 3.8.6.6 Note | 4.9.B.4.c |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | changes to the CTS. | | |
| 3.8.6<br>A.4 | This change to CTS 4.9.B.4.c is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004, and granted in Amendment 143, Sept. 30, 2005, ML052700252. As such, this change is administrative. | SR 3.8.6.6 | 4.9.B.4.c |
| 3.8.7<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.8.7 | 3.9.A, 3.9.A.3, 3.9.A.4, 3.9.B, 3.9.B.4 |
| 3.8.7<br>A.2 | CTS 3.9.A.4 requires the station 125 VDC and 250 VDC batteries to be charged and "in service," however the CTS does not explicitly require the associated DC distribution panels to be to be OPERABLE. ITS LCO 3.8.7, in part, requires the Division 1 and Division 2 DC electrical power distribution subsystems to be OPERABLE. This changes the CTS by specifying the requirements for DC distribution buses. | LCO 3.8.7 | 3.9.A.4 |
| 3.8.8<br>A.1 | The CTS does not contain any specific OPERABILITY requirements for the Distribution Systems during shutdown conditions. However, the CTS 1.0.W definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources ... that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)." ITS LCO 3.8.8 requires the necessary portions of the AC and DC electrical power distribution subsystem to be OPERABLE to support equipment required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. If one or more required AC or DC electrical power distribution subsystems are inoperable, ITS 3.8.8 ACTION A must be entered and the associated supported required features(s) must be declared inoperable or certain activities must be suspended (CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and operations with a potential for draining the reactor vessel (OPDRVs)), action must be initiated to restore the inoperable distribution subsystem, and the required shutdown cooling subsystem(s) must be declared inoperable and not in operation. This changes the CTS by adding the explicit requirements of ITS LCO 3.8.8 and ITS 3.8.8 ACTION A. | LCO 3.8.8, 3.8.8 ACTION A | 1.0.W |
| 3.9.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.9.1 | 3.10.A, 4.10.A |
| 3.9.1<br>A.2 | CTS 3.10.A requires the reactor mode switch to be in the refuel position during core alterations and the refueling interlocks to be OPERABLE. ITS LCO 3.9.1 only requires the refueling "equipment" interlocks associated with the reactor mode switch refuel position to be OPERABLE. This changes the CTS by splitting the requirement of the | LCO 3.9.1 | 3.10.A |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | refueling interlocks into two Specifications. All other refueling interlocks with the reactor mode switch in the refuel position are covered in ITS 3.9.2. | | |
| 3.9.1<br>A.3 | CTS 4.10.A requires refueling interlocks to be functionally tested. ITS SR 3.9.1.1 requires the same test on the required refueling equipment interlock inputs and provides a list of equipment interlocks. This changes the CTS by providing a specific list of refueling equipment interlocks. | SR 3.9.1.1 | 4.10.A |
| 3.9.1<br>A.4 | CTS 3.10.A states that the refueling interlocks are required to be operable "except as specified in specification 3.10.E." The ITS does not include this sentence. This changes the CTS by deleting this cross-reference to another Specification. | None | 3.10.A |
| 3.9.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.9.2 | 3.10.A, 4.10.A |
| 3.9.2<br>A.2 | CTS 3.10.A requires the reactor mode switch to be in the refuel position during core alterations and the refueling interlocks to be OPERABLE. ITS LCO 3.9.2 only requires the refueling "position one-rod-out" interlock to be OPERABLE. This changes the CTS by splitting the requirement of the refueling interlocks into two Specifications. All other refueling interlocks with the reactor mode switch in the refuel position are covered in ITS 3.9.1. | LCO 3.9.2 | 3.10.A |
| 3.9.2<br>A.3 | CTS 3.10.A states that the refueling interlocks are required to be operable "except as specified in specification 3.10.E." The ITS does not include this sentence. This changes the CTS by deleting this cross-reference to another Specification. | None | 3.10.A |
| 3.9.5<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.9.5 | 3.3.D, 3.3.G, 4.3.D |
| 3.9.5<br>A.2 | CTS 3.3.D states, in part, that if an inoperable control rod is inserted full in, it shall not be considered to have an inoperable accumulator. ITS LCO 3.9.5 states "Each withdrawn control rod shall be OPERABLE." ITS 3.9.5 ACTION A requires action to be initiated immediately to fully insert any inoperable control rods. This changes the CTS by restating the existing control rod OPERABILITY requirement and specifying the implied action required to exit the OPERABILITY requirement. | LCO 3.9.5, 3.9.5 ACTION A | 3.3.D |
| 3.9.5<br>A.3 | CTS 3.3.G.1 states, in part, if Specification 3.3.D is not met the unit must be in cold shutdown in 24 hours. ITS LCO 3.9.5 is applicable only in MODE 5. This changes the CTS by deleting the reference to unit shutdown requirements associated with an inoperable control rod accumulator in Refuel Mode. | None | 3.3.G.1 |
| 3.9.5<br>A.4 | This change to CTS 3.3.G is provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-05-013, from Thomas J. Palisano (NMC) to USNRC, dated April 12, 2005. As such, this change is administrative. | 3.9.5 ACTION A | 3.3.G.1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.10.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.10.1 | 3.5.A.2, 3.5.D.1, 3.6.C.1.(b), 3.7.A.2.a.(3) |
| 3.10.1<br>A.2 | CTS 3.5.A.2 requires the High Pressure Coolant Injection (HPCI) System and the Automatic Depressurization System (ADS) to be OPERABLE whenever the reactor pressure is greater than 150 psig and irradiated fuel is in the reactor vessel "except during reactor vessel hydrostatic or leakage tests." CTS 3.5.D.1 requires the Reactor Core Isolation Cooling System (RCIC) to be OPERABLE whenever irradiated fuel is in the reactor vessel and reactor pressure is greater than 150 psig "except during reactor vessel hydrostatic or leakage tests." CTS 3.7.A.2.a.(3) states that Primary Containment Integrity is not required when performing reactor vessel hydrostatic or leakage tests with the reactor not critical. ITS LCO 3.10.1, in part, states that the average reactor coolant temperature specified in Table 1.1-1 for MODE 4 may be changed to "NA," and operation considered not to be in MODE 3 to allow performance of an inservice leak or hydrostatic test provided certain MODE 3 LCOs are met. ITS LCO 3.5.1, LCO 3.5.3, and LCO 3.6.1.1, which specify the requirements for the HPCI System and ADS, RCIC System, and Primary Containment, respectively, are not one of the MODE 3 LCOs that are required to be met. This changes the CTS by deleting the explicit exception to not require the HPCI System, ADS, RCIC System, and Primary Containment to be OPERABLE during the reactor vessel hydrostatic or leakage tests. | LCO 3.10.1 | 3.5.A.2, 3.5.D.1, 3.7.A.2.a.(3) |
| 3.10.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.10.2 | 3.10.E |
| 3.10.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 3.10.6 | 3.10.E |
| 3.10.6<br>A.2 | CTS 3.10.E requires all fuel assemblies to be removed from the core cells associated with the control rods to be removed from the core. It does not make a statement about other control rods that have fuel assemblies in core cells containing one or more fuel assemblies. CTS Bases 3.10.E states that when the refueling interlock input signal from a withdrawn control rod is bypassed, administrative controls will be in effect to prohibit fuel from being loaded into that control cell. ITS LCO 3.10.6.b includes a statement that all other control rods in core cells containing one or more fuel assemblies must be fully inserted. This changes the CTS by adding a specific statement that all other control rods in core cells containing one or more fuel assemblies must be fully inserted. | LCO 3.10.6.b | 3.10.E |
| 3.10.6 | CTS 3.10.E requires the reactor mode switch to be in the Refuel position during | 3.10.6 Applicability | 3.10.E |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| A.3 | extended core and control rod drive maintenance. ITS 3.10.6 specifies the Applicability to be MODE 5 with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met. This changes the CTS by adding the explicit Applicability for multiple control rod withdrawal during refueling. | | |
| 4.0<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 4.0 | 5.0 |
| 5.1<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.1 | 6.1.A |
| 5.2<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.2 | 6.1.A, 6.1.B, 6.1.C, 6.1.D, 6.1.F, Table 6.1.1 |
| 5.2<br>A.2 | CTS 6.1.C.2 states "At least one licensed operator shall be in the control room when fuel is in the reactor." CTS 6.1.C.3 states "At least two licensed operators shall be present in the control room during cold startup, scheduled reactor shutdown, and during recovery from reactor trips." CTS 6.1.C.5 states "All alterations of the reactor core shall be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation." The ITS does not include these requirements. This changes the CTS by deleting these requirements. This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.54(m)(2)(iii) and 10 CFR 50.54(m)(2)(iv) and the Monticello Operating License requires compliance with all NRC regulations. This change is designated as administrative because it does not result in technical changes to the CTS. | None | 6.1.C.2, 6.1.C.3, 6.1.C.5 |
| 5.2<br>A.3 | CTS 6.1.D provides, in part, qualification requirements for the Shift Technical Advisor (STA), and requires the STA to have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents. ITS 5.2.2.f requires this individual to meet the qualification requirements of the Commission Policy Statement on Engineering Expertise on Shift. This changes the CTS by referencing the Commission Policy Statement on Engineering Expertise on Shift for qualification requirements instead of listing the specific qualification requirements. | 5.2.2.f | 6.1.D |
| 5.2<br>A.4 | CTS Table 6.1.1 requires the total number of licensed and non-licensed operators during MODES 4 and 5 (i.e., SHUTDOWN or REFUELING MODE and < 212°F) to be 3 and requires the total number of licensed and unlicensed operators during MODES 1, 2, and 3 (i.e., STARTUP or RUN MODE or $\geq$ 212°F) to be 6. ITS 5.2.2.a requires the total | 5.2.2.a | Table 6.1.1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | number of non-licensed operators to be 1 in MODES 4 and 5 and to be 2 in MODES 1, 2, and 3. This changes the CTS by specifically stating the total number of non-licensed operators required in MODES 1, 2, 3, 4, and 5. | | |
| 5.2<br>A.5 | CTS Table 6.1.1 Note 5 states "One LSO position shall be filled by an individual who meets the qualifications of a Shift Technical Advisor as defined in Section 6.1.D(2). If a qualified individual to staff the combined LSO/STA position is not available, a dedicated Shift Technical Advisor shall be on duty, in addition to two licensed senior operators." ITS 5.2.2, in part, requires the STA to meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift; it does not include this specific information. This changes the CTS by deleting this specific information. | None | Table 6.1.1 Note 5 |
| 5.3<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.3 | 6.1.C.8, 6.1.D |
| 5.3<br>A.2 | CTS 6.1.C.8 states "Licensed reactor operators and senior operators shall complete qualification training in accordance with a Commission-approved training program that is based on a systems approach to training and uses a simulation facility that is acceptable to the Commission." CTS 6.1.D, in part, states "licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8." The ITS does not include these requirements. This changes the CTS by deleting these requirements. The purpose of CTS 6.1.C.8 and 6.1.D part (4) is to provide training requirements for the licensed Senior Operators and Operators. 10 CFR 55 specifies these training requirements. This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 55 and the Monticello Operating License requires compliance with all NRC regulations. This change is designated as administrative because it does not result in technical changes to the CTS. | None | 6.1.C.8, 6.1.D |
| 5.3<br>A.3 | ITS 5.3.2 states "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m)." The CTS does not include such a statement. This changes the CTS by clarifying that these individuals must meet all of the qualification requirements referenced in ITS 5.3.1 and be capable of performing the functions described in 10 CFR 50.54(m). | 5.3.2 | None |
| 5.4<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.4 | 6.5 |
| 5.5<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, | 5.5 | 6.8, 3/7.7.B.2, 3/4.7.B.3, 3/4.17.B.2, 3/4.17.B.3, 4.7.D.4, 4.9.B.3.b.3) |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | BWR/4" (ISTS). | | |
| 5.5<br>A.2 | CTS 6.8.B includes the program requirements for the Primary Coolant Sources Outside Containment Program and includes a statement that a program acceptable to the Commission was described in a letter dated December 31, 1979, from L.O. Mayer, NSP, to Director of Nuclear Reactor Regulation, "Lessons Learned Implementation." ITS 5.5.2 contains the requirements for the Primary Coolant Sources Outside Containment, however the statement concerning a type of NRC-acceptable program is not included. This changes the CTS by deleting this additional statement. | None | 6.8.B |
| 5.5<br>A.3 | CTS 6.8.M includes the program requirements for the Primary Containment Leakage Rate Testing Program. CTS 6.8.M.1 includes an exception from the requirements of Regulatory Guide 1.1.63, "Performance-Based Containment Leak-Test Program," dated September 1995. CTS 6.8.M.6 states that "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J." This statement is not included in the ITS. This changes the CTS by deleting the CTS 6.8.M.6 statement. | None | 6.8.M.6 |
| 5.5<br>A.4 | The Performance Requirements (CTS 3.7.B.2.a and CTS 3.7.B.2.b), Post Maintenance Requirements (CTS 3.7.B.3.a and CTS 3.7.B.3.b), Performance Requirement Tests (4.7.B.2.a, 4.7.B.2.b, and 4.7.B.2.c), and Post Maintenance Testing (4.7.B.3.a and 4.7.B.3.b) requirements associated with the ventilation filter testing for the Standby Gas Treatment (SGT) System and the Performance Requirements (CTS 3.17.B.2.a, CTS 3.17.B.2.b, CTS 3.17.B.2.c.(1), and CTS 3.17.B.2.c.(2)), Post Maintenance Requirements (CTS 3.17.B.3.a and CTS 3.17.B.3.b), Performance Requirement Tests (CTS 4.17.B.2.a, CTS 4.17.B.2.b, CTS 4.17.B.2.c.(1), and CTS 4.17.B.2.c.(2)), and Post Maintenance Testing (CTS 4.17.B.3.a and CTS 4.17.B.3.b) requirements associated with the ventilation filter testing for the Control Room Emergency Filtration (CREF) System have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.6). As such, a general program statement has been added as ITS 5.5.6. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension apply. This changes the CTS by moving the ventilation filter testing Surveillances associated with the SGT and CREF Systems to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. | 5.5.6 | 3.7.B.2.a, 3.7.B.2.b, 3.7.B.3.a, 3.7.B.3.b, 4.7.B.2.a, 4.7.B.2.b, 4.7.B.2.c, 4.7.B.3.a, 4.7.B.3.b, 3.17.B.2.a, 3.17.B.2.b, 3.17.B.2.c.(1), 3.17.B.2.c.(2), 3.17.B.3.a, 3.17.B.3.b, 4.17.B.2.a, 4.17.B.2.b, 4.17.B.2.c.(1), 4.17.B.2.c.(2), 4.17.B.3.a, 4.17.B.3.b |
| 5.5<br>A.5 | CTS 4.7.B.2.a requires the performance of an in-place DOP test of the SGT System HEPA filter banks, an in-place test of the SGT charcoal adsorber banks with halogenated hydrocarbon tracer, and a laboratory analysis of a carbon test sample from the SGT charcoal adsorber once per "operating cycle." CTS 4.7.B.2.c requires the performance of the SGT System heater test once per "operating cycle." CTS 4.17.B.2.a requires the performance of an in-place DOP test of the CREF System HEPA filter banks, an in-place test of the CREF charcoal adsorber banks with halogenated hydrocarbon tracer, and a laboratory analysis of a carbon test sample from the CREF charcoal adsorber once per "operating cycle." CTS 4.17.B.2.c requires the performance of the CREF System heater test and combined filter pressure drop test once per | 5.5.6 | 4.7.B.2.a, 4.7.B.2.c, 4.17.B.2.a, 4.17.B.2.c |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | "operating cycle." ITS 5.5.6 requires the same tests, however the Surveillances are required to be performed every "24 months." This changes the CTS by changing the Frequency from "operating cycle" to "24 months." | | |
| 5.5<br>A.6 | CTS 4.7.D.4 requires the replacement of the seat seal of the drywell and suppression chamber 18 inch purge supply and vent valves once per "six operating cycles." ITS 5.5.11.e requires the same replacement, however the replacement is required every "9 years." In addition, a statement of the applicability of ITS SR 3.0.2 has been added. This changes the CTS by changing the Frequency from "six operating cycles" to "9 years" and specifically stating the applicability of ITS SR 3.0.2. | 5.5.11.e | 4.7.D.4 |
| 5.5<br>A.7 | The Surveillance associated with diesel fuel oil testing (CTS 4.9.B.3.b.3)) has been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.8). As such, a general program statement has been added as ITS 5.5.8. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension apply. This changes the CTS by moving the diesel fuel oil testing Surveillance to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program. Other changes to the Surveillance are discussed in DOCs M.2 and DOC L.2. | 5.5.8 | 4.9.B.3.b.3) |
| 5.5<br>A.8 | CTS 6.8.G requires pump and valve testing per the requirements of Section XI of the ASME Boiler and Pressure Vessel Code. ITS 5.5.5 requires pump and valve testing per the requirements of the ASME Operation and Maintenance (OM) Code. This changes the CTS by referring to the ASME OM Code instead of ASME Boiler and Pressure Code, Section XI. | 5.5.6 | 6.8.G |
| 5.5<br>A.9 | These changes to CTS 4.7.B.2.a, CTS 4.7.B.2.b, CTS 4.17.B.2.a, and CTS 4.17.B.2.c are provided in the Monticello ITS consistent with the Technical Specifications Change Request submitted to the USNRC for approval in NMC letter L-MT-04-036, from Thomas J. Palmisano (NMC) to USNRC, dated June 30, 2004. As such, these changes are administrative. | 5.5.6 | 4.7.B.2.a, 4.7.B.2.b, 4.17.B.2.a, 4.17.B.2.c |
| 5.6<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.6 | 6.7, Table 3.14.1 Required Condition A |
| 5.6<br>A.2 | CTS 6.7 requires, in addition to the requirements of 10 CFR, reports be submitted to the U.S. Nuclear Regulatory Commission, Attn: Document Control Desk, Washington DC 20555, unless otherwise noted. CTS 6.7.A.7.d requires the COLR to be submitted to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector. ITS 5.6 requires that the reports be submitted in accordance with 10 CFR 50.4. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC. | 5.6 | 6.7, 6.7.A.7.d |
| 5.6<br>A.3 | CTS 6.7.A.7.a states, in part, that core operating limits shall be established and documented in the Core Operating Limits Report (COLR) before each reload cycle or any remaining part of a reload cycle for the "Power to Flow Map (Bases 3.1)." ITS | None | 6.7.A.7.a |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | 5.6.3.a does not include reference to the "Power to Flow Map (Bases 3.1)." This changes the CTS by removing the specific reference to "Power to Flow Map (Bases 3.1)." | | |
| 5.6<br>A.4 | CTS 6.7.D requires special reports be submitted within the time period specified by each report. CTS Table 3.14.1 Required Condition A requires the preparation and submittal of a special report to the Commission pursuant to CTS 6.7.D. This is the only Technical Specification that currently references CTS 6.7.D. The ITS does not include a Special Report requirement; all reports have there own individual titles. This changes the CTS by deleting the reference to Special Reports. The special report requirement in CTS Table 3.14.1 is required by ITS 5.6.4, as modified by DOC M.1. | None | 6.7.D, Table 3.14.1 Required Condition A |
| 5.7<br>A.1 | In the conversion of the Monticello Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1433, Rev. 3, "Standard Technical Specifications General Electric Plants, BWR/4" (ISTS). | 5.7 | 6.9 |

## ATTACHMENT 3

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 1.0<br>M.1 | The CTS 1.0.A definition of Alteration of the Reactor Core applies to the act of moving any component in the region "above the core support plate, below the upper grid, and within the shroud with the vessel head removed and fuel in the vessel." The ITS Section 1.1 definition of CORE ALTERATION will only apply to the movement of fuel, sources, or reactivity control components "within the reactor vessel." This changes the CTS by expanding the region to be considered a CORE ALTERATION. The change concerning the types of "components" to be considered in the CORE ALTERATION definition is discussed in DOC L.1. | 1.1 | 1.0.A |
| 1.0<br>M.2 | CTS 1.0.A definition of Alteration of the Reactor Core exempts control rod movement using the normal drive mechanism. The ITS Section 1.1 definition of CORE ALTERATION only exempts control rod movement if there is no fuel assemblies in the associated core cell. This changes the CTS by only exempting control rod movement from the definition if there are no fuel assemblies in the associated core cell. | 1.1 | 1.0.A |
| 1.0<br>M.3 | CTS 1.0.K states the definition of Mode as "The reactor mode is that which is established by the mode-selector switch." CTS 1.0.B states the definition of Hot Standby as "Hot Standby means operation with the reactor critical in the startup mode at a power level just sufficient to maintain reactor pressure and temperature." CTS 1.0.O states the definition of Power Operation as "Power Operation is any operation with the mode switch in the "Start-Up" or "Run" position with the reactor critical and above 1% rated thermal power." CTS 1.0.Y states the definition of Shutdown as "The reactor is in a shutdown condition when the reactor mode switch is in the shutdown mode position and no core alterations are being performed. In this condition, a reactor scram is initiated and a rod block is inserted directly from the mode switch. The scram can be reset after a short time delay. 1. Hot Shutdown means conditions as above with reactor coolant temperature greater than 212˚F. 2. Cold Shutdown means conditions as above with reactor coolant temperature equal to or less than 212˚F." ITS Section 1.1 states the definition of MODE as "A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel." In addition, a new Table (ITS Table 1.1-1) has been added that defines the actual MODES. ITS Table 1.1-1 defines the different MODES as follows:<br><br>• MODE 1 (Power Operation) is when the reactor mode switch is in the Run position;<br><br>• MODE 2 (Startup) is when the reactor mode switch is in the Refuel position and all reactor vessel head closure bolts are fully tensioned (footnote (a)) or when the reactor mode switch is in the Startup/Hot Standby position;<br><br>• MODE 3 (Hot Shutdown) is when the reactor mode switch is in the Shutdown position, all | 1.1, Table 1.1-1 | 1.0.B,<br>1.0.K,<br>1.0.O,<br>1.0.Y |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | reactor vessel head closure bolts are fully tensioned (footnote (a)) and the average reactor coolant temperature is > 212˚F;<br><br>• MODE 4 (Cold Shutdown) is when the reactor mode switch is in the Shutdown position, all reactor vessel head closure bolts are fully tensioned (footnote (a)) and the average reactor coolant temperature is $\leq$ 212˚F; and<br><br>• MODE 5 (Refueling) is when the reactor mode switch is in the Shutdown or Refuel position and one or more reactor vessel head closure bolts are less than fully tensioned (footnote (b)).<br><br>This changes the CTS in several ways:<br><br>The CTS 1.0.K definition of Mode is changed by adding "average reactor coolant temperature," "reactor vessel head closure bolt tensioning specified in Table 1.1-1," and "with fuel in the reactor vessel" to the definition.<br><br>The CTS 1.0.O definition of Power Operation is being split into two distinct MODES: MODE 1 for when the reactor mode switch is in Run position; and MODE 2 for when the reactor mode switch is in the Startup/Hot Standby position. Furthermore, the reference to a power level is deleted for both MODES. Also, the CTS 1.0.B definition of Hot Standby is being combined with the MODE 2 portion of the CTS 1.0.O Power Operation definition. This changes the CTS definition such that: a. when the reactor mode switch is in Run, the unit will always be in MODE 1, even if reactor power level is < 1% rated thermal power or the reactor is subcritical; and b. when the reactor mode switch is in Startup/Hot Standby position, the unit will always be in MODE 2, even if reactor power level is < 1% rated thermal power (or just sufficient to maintain reactor pressure and temperature) or the reactor is subcritical.<br><br>ITS MODE 2 will now include the mode switch position of Refuel when the head closure bolts are fully tensioned (as stated in ITS Table 1.1-1 footnote (a)). Currently, this reactor mode switch and head closure bolt combination is not defined in the CTS.<br><br>The CTS 1.0.Y definition of Shutdown is being split into two distinct MODES: MODE 3 for when the reactor mode switch is in Shutdown and (as described in part 1 of the CTS definition) the average reactor coolant temperature is > 212˚F; and MODE 4 for when the reactor mode switch is | | |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | in Shutdown and (as described in part 2 of the CTS definition) the average reactor coolant temperature is $\leq$ 212˚F. Furthermore, for both MODE 3 and MODE 4, all reactor vessel head closure bolts must be fully tensioned. This changes the CTS definition such that all head bolts must be fully tensioned to be in either MODE 3 or 4, instead of the current requirement that no CORE ALTERATIONS are being performed.<br><br>ITS MODE 5 has been added to clearly define when the unit is in the refuel mode. ITS MODE 5 is defined as the reactor mode switch in either the Shutdown or Refuel position with one or more reactor vessel head closure bolts less than full tensioned. Currently, no defined term exists in the CTS for the Refuel Mode, even though many CTS Specifications use the term Refuel Mode. | | |
| 2.0 | No M Changes | N/A | N/A |
| 3.0<br>M.1 | The CTS does not include any general LCO/ACTION guidance requirements. ITS LCO 3.0.3 is added to the CTS to provide guidance when an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS. ITS LCO 3.0.3 states "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in: a. MODE 2 within 7 hours; b. MODE 3 within 13 hours; and c. MODE 4 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, and 3." This changes the CTS by adding ITS LCO 3.0.3. | LCO 3.0.3 | N/A |
| 3.0<br>M.2 | CTS 4.0.B states, in part, "Specific time intervals between tests may be extended up to 25% of the surveillance interval." ITS SR 3.0.2 includes a similar requirement, but adds the following restriction: "For Frequencies specified as "once," the above interval extension does not apply." This changes the CTS by adding a restriction that Frequencies specified as "once" do not receive a 25% extension. | SR 3.0.2 | 4.0.B |
| 3.1.1<br>M.1 | CTS 4.3.A.1 states, in part, reactivity margin of "0.25 per cent $\Delta$k" is required. ITS LCO 3.1.1 states SDM shall be: a. $\geq$ 0.38% $\Delta$k/k, with the highest worth control rod analytically determined; or b. $\geq$ 0.28% $\Delta$k/k, with the highest worth control rod determined by test. This changes the CTS by replacing the existing SDM limit with two new limits. | LCO 3.1.1 | 4.3.A.1 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.1.1<br>M.2 | CTS 3.3.A.1 states, in part, that core loading shall be limited to that which can be made subcritical in the most reactive condition during the operating cycle. CTS 4.3.A.1 states, in part, that a test shall be performed to demonstrate that the core can be made subcritical at any time in the subsequent fuel cycle. CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.3.A.1 is not met. CTS 3.3.G.2 provides Actions for when the reactor mode switch is in the Refuel position (i.e., MODE 5 in the ITS). ITS LCO 3.1.1 requires SDM to be met during MODES 1, 2, 3, 4, and 5. This changes the CTS by changing the Applicability from MODE 1, 2, and 3 (based on the shutdown requirement of CTS 3.3.G.1) and MODE 5 (based on the reactor mode switch position requirement of CTS 3.3.G.2) to MODES 1, 2, 3, 4, and 5. Changes to the requirements of CTS 3.3.G.1 are discussed in DOC M.5 and changes to the requirements of CTS 3.3.G.2 are discussed in DOCs A.3 and M.6. | 3.1.1 Applicability | 3.3.A.1,<br>3.3.G.1,<br>3.3.G.2 |
| 3.1.1<br>M.3 | CTS 4.3.A.1 states, in part, the reactivity margin demonstration shall be performed "following a refueling outage when core alterations were performed." ITS SR 3.1.1.1 states, verify SDM to be within limits at a Frequency of "Once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement." This changes the CTS by stating a finite time to complete the Surveillance (once within 4 hours after criticality) and requiring the Surveillance to be performed following fuel movement within the reactor pressure vessel or control rod replacement in lieu of following a "refueling outage" when core alterations were performed. | SR 3.1.1.1 | 4.3.A.1 |
| 3.1.1<br>M.4 | ITS SR 3.1.1.1 requires verification of SDM "Prior to each in vessel fuel movement during fuel loading sequence." Currently, the CTS does not require a SDM verification at this Frequency. This changes the CTS by adding a new Surveillance Frequency for the SDM verification. | SR 3.1.1.1 | None |
| 3.1.1<br>M.5 | CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.3.A.1 is not met. ITS 3.1.1 specifies specific ACTIONS for each MODE (MODE 1, 2, 3, 4, and 5). ITS 3.1.1 ACTION A covers the condition for SDM not met in MODES 1 or 2, and requires the restoration of SDM to within limits within 6 hours. If this is not met, ITS 3.1.1 ACTION B requires the unit to be in MODE 3 in 12 hours. ITS 3.1.1 ACTION C covers the condition for SDM not met in MODE 3, and requires immediate initiation of action to fully insert all insertable control rods. ITS 3.1.1 ACTION D covers the condition for SDM not met in MODE 4, and requires immediate initiation of action to fully insert all insertable control rods, and within 1 hour, to restore secondary containment to OPERABLE status, to restore one standby gas treatment (SGT) subsystem to OPERABLE status, and to restore isolation capability in each required secondary containment penetration flow path not isolated. This changes the CTS by specifying explicit compensatory actions for MODES 1, 2, 3, and 4 in lieu of a single common action for these MODES. | 3.1.1<br>ACTIONS A, B, C, and D | 3.3.G.1 |
| 3.1.1 | CTS 3.3.G.2 requires the immediate suspension of core alterations except for "fuel assembly | 3.1.1 Required Actions D.3 | 3.3.G.2 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| M.6 | removal" and to "immediately initiate action to fully insert all insertable control rods in core cell containing one or more fuel assemblies" if CTS 3.3.A.1 is not met when the reactor mode switch is in the Refuel position. ITS 3.1.1 ACTION E covers the condition for SDM not met in MODE 5, and requires the immediate suspension of CORE ALTERATIONS except for control rod insertion and fuel assembly removal, immediate initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies, and to initiate action within 1 hour to restore secondary containment to OPERABLE status, restore one standby gas treatment (SGT) subsystem to OPERABLE status, and restore isolation capability in each required secondary containment penetration flow path not isolated. This changes the CTS by adding the explicit compensatory actions associated with the secondary containment functions. | and D.4 | |
| 3.1.2<br>M.1 | CTS 4.3.E states that the reactivity anomaly Surveillance shall be performed "at each" startup following refueling outages. The ITS SR 3.1.2.1 Surveillance Frequency states that the Surveillance is performed "Once within 24 hours after reaching equilibrium conditions" following startup after fuel movement within the reactor pressure vessel or control rod replacement. This changes the CTS by providing an explicit time period to complete the Surveillance following a startup. This change to the "following refueling outage" portion of the frequency is discussed in DOC M.2. | SR 3.1.2.1 | 4.3.E |
| 3.1.2<br>M.2 | CTS 4.3.E states, in part, that the reactivity anomaly Surveillance shall be performed "following refueling outages." This Frequency is changed in ITS SR 3.1.2.1 to be "after fuel movement within the reactor pressure vessel or control rod replacement." This changes the CTS by clearly defining the activities after which the reactivity anomaly Surveillance should be performed. | SR 3.1.2.1 | 4.3.E |
| 3.1.2<br>M.3 | CTS 3.3.E requires the reactivity anomaly requirements to be met in the "reactor power operation" condition. ITS LCO 3.1.2 is Applicable in MODES 1 and 2. This changes the CTS by requiring the reactivity anomaly limit to be met in MODE 2 $\leq$ 1% RATED THERMAL POWER (RTP). | 3.1.2 Applicability | 3.3.E |
| 3.1.3<br>M.1 | CTS 3.3.A.2.(a) states, in part, "The directional control valves for inoperable control rods shall be disarmed electrically and the rods shall be in such positions that Specification 3.3.A.1 is met." CTS 3.3.B.1 states, in part, "Each control rod coupled to its drive or completely inserted and the directional control valves disarmed." ITS 3.1.3 ACTION A covers the condition of one withdrawn control rod stuck, and requires the immediate verification that the stuck control rod separation criteria is met (Required Action A.1), the disarming of the associated control rod drive within 2 hours (Required Action A.2), and the performance of SR 3.1.1.1 (SHUTDOWN MARGIN verification test) within 72 hours (Required Action A.4). ITS 3.1.3 ACTION C covers the condition of one or more control rods inoperable for reasons other than a stuck control rod, and requires fully inserting an inoperable control rod within 3 hours (Required Action C.1) and disarming the associated control rod drive within 4 hours (Required Action C.2). This changes the CTS by adding finite times to perform the Required Actions and adds a new Required Action to verify | 3.1.3<br>ACTIONS A and C | 3.3.A.2.(a),<br>3.3.B.1 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | stuck control rod separation criteria is met. | | |
| 3.1.3<br>M.2 | CTS 3.3.A.2.(c) allows continued operation with up to six non-fully inserted, inoperable (i.e., stuck) control rods. CTS 4.3.A.2.(c) states "If power operation is continuing with two or more non-fully inserted control rods that are inoperable, each operable fully or partially withdrawn control rod shall be exercised at least one notch every 24 hours." ITS 3.1.3 ACTION B requires the unit to be in MODE 3 with two stuck control rods. This changes the CTS by changing the number of non-fully inserted control rods that can be inoperable (i.e., stuck) and continue operations in MODE 1 and 2 from "six" to "one." | 3.1.3 ACTION B | 3.3.A.2.(a), 4.3.A.2.(c) |
| 3.1.3<br>M.3 | CTS 3.3.A.2.(c), in part, requires the unit to be in hot shutdown (MODE 3) in within 48 hours. ITS 3.1.3 ACTION B requires the unit to be in MODE 3 within 12 hours. This changes the CTS by changing the time to reach MODE 3 from 48 hours to 12 hours. | 3.1.3 ACTION B | 3.3.A.2.(c) |
| 3.1.3<br>M.4 | CTS 3/4.3.A.2 provides requirements for stuck control rods. CTS 3/4.3.B.1 provides requirements for control rod coupling. There are no requirements associated with the determination of each control rod position and maximum scram time of the control rods. ITS 3.1.3 includes two Surveillance Requirements to cover these requirements. ITS SR 3.1.3.1 requires the determination of the position of each control rod every 24 hours. ITS SR 3.1.3.4 requires the verification that each control rod scram time from the fully withdrawn position to notch position 06 is within limit (i.e. $\leq$ 7 seconds) in accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4. This changes the CTS by adding two additional OPERABILITY requirements for the control rods (i.e., maximum scram insertion time, and control rod position). | SR 3.1.3.1,<br>SR 3.1.3.4 | None |
| 3.1.3<br>M.5 | CTS 4.3.A.2.(a) requires each fully or partially withdrawn operable control rod to be "exercised" at least one notch. CTS 4.3.A.2.(b) requires the same testing when a control rod is found to be stuck. ITS SR 3.1.3.2, ITS SR 3.1.3.3, and ITS 3.1.3 Required Action A.3 requires the same testing however the control rods must be "inserted" in lieu of "exercised." This changes the CTS by requiring the OPERABLE withdrawn control rods to be "inserted" one notch instead of "exercised" one notch. | 3.1.3<br>Required Action A.3,<br>SR 3.1.3.2,<br>SR 3.1.3.3, | 4.3.A.2.(a),<br>4.3.A.2.(b) |
| 3.1.3<br>M.6 | CTS 3.3.A.2 provides requirements for stuck control rods. CTS 3.3.B.1 provides requirements for control rod coupling. ITS 3.1.3 ACTION D provides an additional restriction for when two or more inoperable control rods are not in compliance with banked position withdrawal sequence (BPWS) and not separated by two or more OPERABLE control rods and reactor power is $\leq$ 10% RTP. In this condition, ITS 3.1.3 ACTION D requires within 4 hours either the restoring of compliance with BPWS or the restoring of a control rod to OPERABLE status. This changes the CTS by adding an explicit ACTION for inoperable control rods under certain conditions when reactor power is $\leq$ 10% RTP. | 3.1.3 ACTION D | None |
| 3.1.3<br>M.7 | CTS 3/4.3.B.1 does not place a limitation of the number of inoperable control rods. ITS 3.1.3 ACTION E (second part of Condition E) covers the condition for nine or more inoperable control | 3.1.3 ACTION E | None |

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | rods, and requires the unit to be in MODE 3 in 12 hours. This changes the CTS by adding an explicit ACTION for nine or more inoperable control rods. | | |
| 3.1.3<br>M.8 | CTS 4.3.A.2.(b), which requires a periodic exercise test of the remaining fully and partially withdrawn OPERABLE control rods when a control rod is found to be stuck, states "This surveillance is not required if it has been confirmed that control rod drive collet housing failure is not the cause of the immovable control rod." The ITS does not maintain this allowance. ITS 3.1.3 Required Action A.3 will require a similar test when a control rod is found to be stuck, regardless of the reason for the stuck control rod. This changes the CTS by requiring an insertion test of remaining fully and partially withdrawn OPERABLE control rods when a stuck rod is found, regardless of the reason the rod is stuck. | 3.1.3 Required Action A.3 | 4.3.A.2.(b) |
| 3.1.3<br>M.9 | CTS 4.3.B.1.(a) states that "when the rod is fully withdrawn the first time subsequent to each refueling outage," observe that the drive does not go to the overtravel position. ITS SR 3.1.3.5 requires the same verification, however, it must be performed each time the control rod is withdrawn to the full out position and prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling. This changes the CTS by changing the requirement to perform the coupling verification from "when the rod is fully withdrawn the first time subsequent to each refueling outage" to "Each time the control rod is withdrawn to full out position" and by adding the new Frequency of "Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling." | SR 3.1.3.5 | 4.3.B.1.(a) |
| 3.1.4<br>M.1 | CTS 3.3.C.1 specifies criteria for the average scram insertion time of all OPERABLE control rods from the fully withdrawn position to the 5%, 20%, 50%, and 90% inserted positions. CTS 3.3.C.2 specifies criteria for the average scram insertion time for the three fastest control rods of all groups of four control rods in a two by two array from the fully withdrawn position to the 5%, 20%, 50%, and 90% inserted positions. ITS LCO 3.1.4 states "a. No more than 8 OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1, and " b. No more than 2 OPERABLE control rods that are "slow" shall occupy adjacent locations." ITS Table 3.1.4-1 specifies the maximum scram times for each control rod, when reactor steam dome pressure is $\geq$ 800 psig, to notch positions 46, 36, 26, and 06. ITS Table 3.1.4-1 Note 1 states that OPERABLE control rods with scram times not within the limits of this Table are considered "slow." ITS Table 3.1.4-1 Note 2 states "Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod OPERABILITY," for control rods with scram times > 7 seconds to notch position 06. These control rods are inoperable, in accordance with ITS SR 3.1.3.4, and are not considered "slow." ITS Table 3.1.4-1 footnote (b) states "Scram times as a function of reactor steam dome pressure when < 800 psig are within established limits." This changes the CTS by specifying control rod scram time for each individual control rod as a function of reactor steam dome pressure instead of the current scram time requirements based on the average scram insertion time of all OPERABLE | LCO 3.1.4,<br>Table 3.1.4-1 | 3.3.C.1,<br>3.3.C.2 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | control rods and for the average scram insertion time for the three fastest control rods of all groups of four control rods in a two by two array. In addition, criteria has been established for no more than 8 "slow" OPERABLE control rods and no more than 2 "slow" OPERABLE control rods occupying adjacent locations. | | |
| 3.1.4<br>M.2 | CTS 4.3.C requires each OPERABLE rod to be scram time tested during each operating cycle, however, it also states that if testing is not accomplished during reactor power operation, the measured scram time may be extrapolated to the reactor power operation condition. ITS SR 3.1.4.1 requires verification that each control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure $\geq$ 800 psig prior to exceeding 40% RTP after each reactor shutdown $\geq$ 120 days. ITS SR 3.1.4.2 requires verification that, for a representative sample, each tested control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure $\geq$ 800 psig every 200 days of cumulative operation in MODE 1. ITS SR 3.1.4.3 requires verification that each affected control rod scram time is within the limits of Table 3.1.4-1 with any reactor steam dome pressure prior to declaring a control rod OPERABLE after work on control rod or CRD System that could affect scram time. ITS SR 3.1.4.4 requires verification that each affected control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure $\geq$ 800 psig prior to exceeding 40% RTP after fuel movement within the affected core cell and prior to exceeding 40% RTP after work on a control rod or the CRD System that could affect the scram time. In addition, a Surveillance Note has been added that states "During single control rod scram time Surveillances, the CRD pumps shall be isolated from the associated scram accumulator." This changes the CTS by requiring a scram time test to be performed prior to declaring a control rod OPERABLE after work on control rod or CRD System that could affect scram time. It also requires the unit to complete scram time testing of affected control rods prior to exceeding 40% RTP after fuel movement within the affected cell and after work on a control rod or the CRD System that could affect the scram time. In addition, if the reactor is shutdown for $\geq$ 120 days, a scram time test of each control rod is required to be performed prior to exceeding 40% RTP, and, after every 200 days of cumulative operation in MODE 1, a representative sample of control rods must be scram time tested. Finally the change requires the single control rod scram time Surveillance to be performed with the CRD pumps isolated form the associated scram accumulator. | SR 3.1.4.1,<br>SR 3.1.4.2,<br>SR 3.1.4.3,<br>SR 3.1.4.4 | 4.3.C |
| 3.1.4<br>M.3 | CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.3.C is not met. ITS 3.1.4 ACTION A requires the unit to be in MODE 3 in 12 hours when ITS LCO 3.1.4 is not met. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours instead of 24 hours. The change to the unit condition required to be achieved (MODE 3 versus MODE 4) is discussed in DOC A.2. | 3.1.4 ACTION A | 3.3.G.1 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | | | |
| 3.1.4<br>M.4 | CTS 3.3.C.1 requires the scram times to be within the limits in the "reactor power operation condition." ITS LCO 3.1.4 is Applicable in MODES 1 and 2. This changes the CTS by requiring the scram time limits to be met in MODE 2 $\leq$ 1% RATED THERMAL POWER (RTP). | 3.1.4 Applicability | 3.3.C.1 |
| 3.1.5<br>M.1 | CTS 4.3.D requires a check of the accumulator pressure alarm located in the control room. ITS SR 3.1.5.1 requires a verification that each control rod scram accumulator pressure is $\geq$ 940 psig. This changes the CTS by providing an explicit value for control rod accumulator pressure, in lieu of specifying the alarm in the control room must be checked. | SR 3.1.5.1 | 4.3.D |
| 3.1.6<br>M.1 | CTS 4.3.B.3.(a) does not require any verification of proper control rod sequence. ITS SR 3.1.6.1 requires verification that all OPERABLE control rods comply with bank position withdrawal sequence (BPWS) every 24 hours. This changes the CTS by adding a Surveillance requirement to verify all OPERABLE control rods comply with BPWS. | SR 3.1.6.1 | None |
| 3.1.7<br>M.1 | [3.1.7 M.1 withdrawn during LAR review due to TSTF-439 Rev. 2 incorporation.] | N/A | N/A |
| 3.1.7<br>M.2 | ITS SR 3.1.7.4 requires the verification of the continuity of the explosive charge. ITS SR 3.1.7.6 requires verification that each SLC subsystem manual valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position, or can be aligned to the correct position. ITS SR 3.1.7.9 requires verification that all heat traced piping between storage tank and pump suction is unblocked. The CTS does not include these Surveillance Requirements. This changes the CTS by adding these new Surveillances. | SR 3.1.7.4,<br>SR 3.1.7.6, and<br>SR 3.1.7.9 | None |
| 3.1.7<br>M.3 | With boron concentration limits of CTS 3.4.B.1 not met, CTS 3.4.B.1.a requires compliance with Equation 2 to be demonstrated within 7 days. If compliance with Equation 2 is not demonstrated within 7 days, CTS 3.4.B.1.b requires the Commission to be notified and a special report provided outlining the actions taken and the plans and schedule for demonstrating compliance with the ATWS Design Basis. ITS 3.1.7 ACTION A maintains 7 days to establish the appropriate conditions to satisfy the ATWS Design Basis, but if Equation 2 is not satisfied within the 7 day period, ITS 3.1.7 ACTION D requires a shutdown to MODE 3 within 12 hours. This changes the CTS by deleting the option to notify the Commission and continuing to operate with Equation 2 not met. | 3.1.7 ACTION D | 3.4.B.1.b |
| 3.1.7<br>M.4 | CTS 4.4.B.2 requires the boron concentration to be determined anytime water or boron is added to the solution or if the solution temperature drops below the limits specified in Figure 3.4-2. However, no finite time to complete performance of this Surveillance is provided. ITS SR 3.1.7.5 requires the same Surveillance; however, a requirement has been added to require the Surveillance to be completed once "within 24 hours" after water or boron is added to the solution and once "within 24 hours after solution temperature is restored" within the limits of Figure 3.1.7-2. | SR 3.1.7.5 | 4.4.B.2 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | This changes the CTS by placing a time limit of 24 hours to perform the Surveillance. | | |
| 3.1.8<br>M.1 | ITS SR 3.1.8.1 requires the verification that each SDV vent and drain valve is open. A Note is included that states that this Surveillance is not required to be met on vent and drain valves closed during performance of SR 3.1.8.2. The CTS does not contain a similar requirement. This changes the CTS by adding a new Surveillance Requirement for the SDV vent and drain valves. | SR 3.1.8.1 | None |
| 3.1.8<br>M.2 | CTS 3.3.F requires the scram discharge volume vent and drain valve requirements to be met in the "reactor operation" condition. ITS LCO 3.1.8 is Applicable in MODES 1 and 2. This changes the CTS by requiring the scram discharge volume vent and drain valve requirements to be met in MODE 2 $\leq$ 1% RATED THERMAL POWER (RTP). | 3.1.8 Applicability | 3.3.F |
| 3.2.2<br>M.1 | CTS 4.11.C does not specify a Surveillance Requirement to determine the MCPR limits after completion of scram time testing. ITS SR 3.2.2.2 requires the determination of the MCPR limits once within 72 hours after each completion of SR 3.1.4.1, once within 72 hours after each completion of SR 3.1.4.2, and once within 72 hours after each completion of SR 3.1.4.4 (scram time testing Surveillances). This changes the CTS by adding ITS SR 3.2.2.2 to the Technical Specifications. | SR 3.2.2.2 | None |
| 3.3.1.1<br>M.1 | CTS 4.1.A and CTS Tables 4.1.1 and 4.1.2 do not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.1.1-1 requires the performance of SR 3.3.1.1.12, a LOGIC SYSTEM FUNCTIONAL TEST every 24 months, for each RPS Instrumentation Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST to be performed on each RPS Function. | SR 3.3.1.1.12 | None |
| 3.3.1.1<br>M.2 | CTS 3.1.B.1 states that with one required instrument channel inoperable in one or more trip functions, place the inoperable channel(s) or trip system in the tripped condition within 12 hours. ITS 3.3.1.1 ACTION C covers the condition of one or more Functions with RPS trip capability not maintained, and only allows one hour to restore RPS trip capability. This changes the CTS by requiring entry into ITS 3.3.1.1 ACTION C when any manual trip channel (Manual Scram and Reactor Mode Switch - Shutdown Position) is inoperable, instead of allowing 12 hours to trip the inoperable channel. | 3.3.1.1 ACTION C | 3.1.B.1 |
| 3.3.1.1<br>M.3 | CTS 3.1.B.3 requires the plant to be placed and maintained under the specified conditions using normal operating procedures if CTS 3.1.B.1 and CTS 3.1.B.2 are not met. CTS Table 3.1.1 Note * provides the Required Conditions when specified by CTS 3.1.B.3. CTS Table 3.1.1 Required Condition A states "All operable control rod fully inserted." CTS Table 3.1.1 Required Condition B states "Power on IRM range or below and reactor in Startup, Refuel, or Shutdown mode." CTS Table 3.1.1 Required Condition C states "Reactor in Startup or Refuel mode and pressure below 600 psig." CTS Table 3.1.1 Required Condition D states "Reactor Power less than 45%." | 3.3.1.1<br>ACTIONS E, F, G, and H | 3.1.B.3, Table 3.1.1 Required Conditions A, B, C, and D |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | However, no time is specified to complete the Required Conditions. ITS 3.3.1.1 ACTION E requires the plant to reduce THERMAL POWER to ≤ 45% RTP within 4 hours. ITS 3.3.1.1 ACTION F requires the plant to be in MODE 2 within 6 hours and to reduce reactor pressure < 600 psig within 12 hours. ITS 3.3.1.1 ACTION G requires the plant to be in MODE 3 in 12 hours. ITS 3.3.1.1 ACTION H requires immediate action to initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. This changes the CTS by providing specific times to reach the required conditions. Changes to the actual required condition are discussed in other DOCs. | | |
| 3.3.1.1<br>M.4 | CTS Table 4.1.2 requires the performance of an APRM calibration, and Note 4 states that this calibration is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 requires the verification that the absolute difference between the average power range monitor (APRM) channels and the calculated power is ≤ 2% RTP. This changes the CTS by adding an explicit acceptance criterion for the test (i.e., ≤ 2% RTP). | SR 3.3.1.1.2 | Table 4.1.2 (for APRM channel), including Note 4 |
| 3.3.1.1<br>M.5 | CTS Table 3.1.1 requires the High Reactor Pressure Trip Function (Trip Function 5) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run position. However, CTS Table 3.1.1 Note (9) states that the Trip Function is not required to be OPERABLE when the reactor vessel head is unbolted (i.e., one or more reactor head closure bolts less than fully tensioned). Furthermore, CTS Table 3.1.1 Note (3) states that the only RPS Trip Functions that are required to be OPERABLE when in the refueling mode with the reactor subcritical and reactor water temperature less than 212˚F are Mode Switch in Shutdown, Manual Scram, High Flux IRM (i.e., Neutron Flux IRM High - High and Neutron Flux IRM Inoperative), and Scram Discharge Volume High Level. ITS Table 3.3.1.1-1 requires the Reactor Vessel Steam Dome Pressure - High Function to be OPERABLE in MODES 1 and 2. This changes the CTS by requiring the High Reactor Pressure Function to be OPERABLE at all times when the reactor mode switch is in the Startup/Hot Standby position and the Run positions regardless of the status of the reactor vessel head bolts. | Table 3.3.1.1-1 Function 3 | Table 3.1.1<br>Trip Function 5, including Notes (3) and (9) |
| 3.3.1.1<br>M.6 | CTS Table 3.1.1 requires the High Drywell Pressure Trip Function (Trip Function 6) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run positions. However, CTS Table 3.1.1 Note (4) states that this Function is not required to be OPERABLE when primary containment integrity is not required. CTS 3.7.A.2.a.(1) requires the primary containment integrity to be applicable at all times when the reactor is critical or when the reactor water temperature is above 212˚F and fuel is in the reactor vessel. Furthermore, CTS Table 3.1.1 Note (3) states that the only RPS Trip Functions that are required to be OPERABLE when in the refueling mode with the reactor subcritical and reactor water temperature less than 212˚F are Mode Switch in | Table 3.3.1.1-1 Function 6 | Table 3.1.1<br>Trip Function 6, including Notes (3) and (4) |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Shutdown, Manual Scram, High Flux IRM (i.e., Neutron Flux IRM High - High and Neutron Flux IRM Inoperative), and Scram Discharge Volume High Level. ITS Table 3.3.1.1-1 Function 6 requires the Drywell Pressure - High Function to be OPERABLE in MODES 1 and 2. This changes the CTS by requiring the High Drywell Pressure Trip Function to be OPERABLE at all times when the reactor mode switch is in the Refuel and Startup positions when the vessel head is on, even if the reactor is subcritical and temperature is below 212˚F. | | |
| 3.3.1.1<br>M.7 | CTS Table 3.1.1 requires the Reactor Low Water Level Trip Function (Trip Function 7) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run positions. However, CTS Table 3.1.1 Note (3) states that when the reactor mode switch is in the refuel position and the reactor is subcritical and reactor water temperature is less than 212˚F the only RPS Trip Functions that are required to be OPERABLE are Mode Switch in Shutdown, Manual Scram, High Flux IRM (i.e., Neutron Flux IRM High - High and Neutron Flux IRM Inoperative), and Scram Discharge Volume High Level. ITS Table 3.3.1.1-1 Function 4 requires the Reactor Vessel Water Level - Low Function to be OPERABLE in MODES 1 and 2. This changes the CTS by requiring Reactor Low Water Level Trip Function to be OPERABLE when the reactor mode switch is in the Refuel position and the vessel head is on, even if the reactor is subcritical and temperature is below 212˚F. | Table 3.3.1.1-1 Function 4 | Table 3.1.1<br>Trip Function 7, including Note (3) |
| 3.3.1.1<br>M.8 | CTS Table 3.1.1 Note (e) allows the High Drywell Pressure Trip Function (Trip Function 6) to be bypassed in Startup and Run modes during purging for containment inerting or de-inerting operations by closing the manual containment isolation valves. ITS Table 3.3.1.1-1 does not include this bypass allowance for the Drywell Pressure - High Function (Function 6). This changes the CTS by deleting the allowance to bypass the High Drywell Pressure Trip Function during containment purging operations. | None | Table 3.1.1 Note (e) |
| 3.3.1.1<br>M.9 | CTS Table 3.1.1 Trip Function 11 (Turbine Control Valve Fast Closure) references Note (7) for the Limiting Trip Setting. However, Note (7) states that the trip is upon a loss of oil pressure to the acceleration relay. No specific oil pressure is provided. ITS Table 3.3.1.1-1 Function 9 title includes the information concerning low oil pressure to the acceleration relay and specifies the Allowable Value for this Function to be $\geq$ 167.8 psig. This changes the CTS by providing a specific value for the Allowable Value for the Turbine Control Valve Fast Closure Function. | Table 3.3.1.1-1 Function 9 | Table 3.1.1<br>Trip Function 11, including Note (7) |
| 3.3.1.1<br>M.10 | CTS Table 4.1.1 does not provide a Surveillance to perform a functional test of each RPS automatic scram contactor every 7 days. ITS SR 3.3.1.1.4 requires a functional test of each RPS automatic scram contactor and is required for each automatic RPS Function in ITS | SR 3.3.1.1.4 | None |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Table 3.3.1.1-1. This changes the CTS by adding this SR associated with the automatic scram contactors. | | |
| 3.3.1.1 M.11 | CTS Table 4.1.1 does not provide a Surveillance to perform a verification that the Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Acceleration Relay Oil Pressure - Low channels are not bypassed when THERMAL POWER is > 45% RTP every 24 months. ITS SR 3.3.1.1.13 includes this testing requirement. This changes the CTS by adding this SR associated Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Acceleration Relay Oil Pressure - Low channels. | SR 3.3.1.1.13 | None |
| 3.3.1.1 M.12 | CTS Table 4.1.1 Note 2 requires the performance of a sensor check of the low reactor water level channels once per day. ITS SR 3.3.1.1.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by changing the Frequency of testing from once per "day" to "12 hours." | SR 3.3.1.1.1 | Table 4.1.1 Note 2 |
| 3.3.1.1 M.13 | CTS Table 4.1.1 Note 3 applies to the IRM channels and it requires the performance of a functional test "prior to every startup." ITS SR 3.3.1.1.3 requires the performance of a CHANNEL FUNCTIONAL TEST every 7 days. A Note is included which states that the Surveillance is not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. This changes the CTS by modifying the Frequency for the CHANNEL FUNCTIONAL TEST of the IRM channel from "prior to every startup" to "every 7 days" which will essentially require the CHANNEL FUNCTIONAL TEST to be performed during both startups and shutdowns, and adds the Note to allow entry into MODE 2 from MODE 1 to properly perform the test during a shutdown. | SR 3.3.1.1.3 (including Note) | Table 4.1.1 Note 3 |
| 3.3.1.1 M.14 | CTS Table 4.1.2 provides a requirement to perform a calibration of the APRMs by performing a heat balance. ITS 3.3.1.1 adds two additional Surveillances for the APRMs channels. ITS SR 3.3.1.1.6 requires the calibration of the local power range monitors every 2000 effective full power hours and ITS SR 3.3.1.1.9 requires the performance of a CHANNEL CALIBRATION of the APRM channel every 92 days. This changes the CTS by adding two new Surveillances to ensure the APRM channels are operating properly. | SR 3.3.1.1.6, SR 3.3.1.1.9 (including Note) | Table 4.1.2 |
| 3.3.1.1 M.15 | CTS 4.1.1 does not provide any requirements to perform a CHANNEL CHECK on the IRM and APRM/Flow Reference instrument channels. ITS Table 3.3.1.1-1 Function 1.a (Intermediate Range Monitors Neutron Flux - High High) and Function 2.a (Average Power Range Monitors Flow Referenced Neutron Flux - High High) require the performance of SR 3.3.1.1.1, a CHANNEL CHECK, every 12 hours. This changes the CTS by explicitly requiring a CHANNEL CHECK to be performed on the IRM and APRM channels. | SR 3.3.1.1.1 for Functions 1.a and 2.a | None |
| 3.3.1.2 M.1 | CTS 4.10.B, in part, requires performance of a functional test prior to making any alterations to the core. ITS Table 3.3.1.2-1 requires a CHANNEL FUNCTIONAL TEST (ITS SR 3.3.1.2.5) every 7 days when in MODE 5. Additionally, ITS SR 3.3.1.2.5 requires determination of the signal-to- | SR 3.3.1.2.5 | 4.10.B |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | noise ratio (unless there are less than or equal to two fuel assemblies adjacent to the SRM and no other fuel assemblies are in the associated core quadrant). This changes the CTS by requiring the CHANNEL FUNCTIONAL TEST every 7 days when in MODE 5, not just prior to the start of CORE ALTERATIONS, and by requiring an additional Surveillance requirement to verify the signal-to-noise ratio (unless there are less than or equal to two fuel assemblies adjacent to the SRM and no other fuel assemblies are in the associated core quadrant) every 7 days. | | |
| 3.3.1.2<br>M.2 | CTS 4.10.B, in part, requires a check of SRM neutron response prior to making any alterations to the core and daily thereafter. CTS 4.3.B.4 requires, prior to control rod withdrawal for startup or during refueling, that the SRM count rate be ≥ 3 CPS. ITS Table 3.3.1.2-1 requires, when in MODE 5, a verification of the count rate (ITS SR 3.3.1.2.4) every 12 hours during CORE ALTERATIONS and every 24 hours at all other times. ITS Table 3.3.1.2-1 also requires, when in MODE 2 with IRMs on Range 2 or below, a verification of count rate (ITS SR 3.3.1.2.4) every 24 hours. This changes the CTS by requiring an increased Surveillance Frequency during CORE ALTERATIONS requiring a count rate verification anytime when in MODE 5, not just during CORE ALTERATIONS, and a count rate verification in MODE 2, not just prior to entering MODE 2. | SR 3.3.1.2.4 | 4.3.B.4,<br>4.10.B |
| 3.3.1.2<br>M.3 | CTS 3.10.B specifies location requirements for SRMs during CORE ALTERATIONS. ITS SR 3.3.1.2.2 requires verification of SRM locations and specifies a Frequency every 12 hours. This changes the CTS by providing a specific Surveillance Frequency. | SR 3.3.1.2.2 | 3.10.B |
| 3.3.1.2<br>M.4 | The CTS does not require a CHANNEL CHECK or a CHANNEL CALIBRATION of the SRMs while in MODE 2 or 5, and does not require a CHANNEL FUNCTIONAL TEST of the SRMs while in MODE 2. ITS SR 3.3.1.2.1 requires performance of a CHANNEL CHECK every 12 hours in MODES 2 and 5. ITS SR 3.3.1.2.6 requires performance of a CHANNEL FUNCTIONAL TEST including a signal-to-noise ratio determination every 31 days while in MODE 2. ITS SR 3.3.1.2.7 requires performance of a CHANNEL CALIBRATION every 24 months in MODES 2 and 5. This changes the CTS by adding new Surveillance Requirements. | SR 3.3.1.2.1,<br>SR 3.3.1.2.6, SR 3.3.1.2.7 | None |
| 3.3.1.2<br>M.5 | CTS 3.10.B does not specify any Actions for an inoperable required SRM during CORE ALTERATIONS. CTS 3.3.G.1 specifies that if CTS 3.3.B.4 requirements are not met, the reactor shall be placed in the cold shutdown condition within 24 hours. Thus, when a required SRM is inoperable during control rod withdrawal in refuel (i.e., CORE ALTERATIONS) the CTS 3.3.G.1 requirement to be in cold shutdown in 24 hours would apply. However, since the unit is already in refuel the action to be in cold shutdown is not required (i.e., no ACTIONS are actually applicable). When one or more SRMs are inoperable in MODE 5, ITS 3.3.1.2 ACTION E requires CORE ALTERATIONS, except for control rod insertion, be immediately suspended, and action be immediately initiated to fully insert all insertable control rods in core cells containing one or more | 3.3.1.2 ACTION E | 3.3.G.1 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | fuel assemblies. This changes the CTS by specifying actions that are necessary to prevent reactivity changes and ensure the reactor will be at its minimum reactivity. | | |
| 3.3.1.2<br>M.6 | The CTS does not provide any SRM requirements in MODES 3 and 4 (i.e., Hot and Cold Shutdown). ITS Table 3.3.1.2-1 includes requirements for two SRMs to be OPERABLE in MODES 3 and 4 and specifies the applicable Surveillances required to demonstrate the SRMs OPERABILITY. The Surveillance Requirements in MODES 3 and 4 are ITS SR 3.3.1.2.3 (CHANNEL CHECK), ITS SR 3.3.1.2.4 (count rate verification), ITS SR 3.3.1.2.6 (CHANNEL FUNCTIONAL TEST and signal to noise ratio determination), and ITS SR 3.3.1.2.7 (CHANNEL CALIBRATION). In addition, ITS 3.3.1.2 ACTION D is added to address one or more inoperable SRMs in MODE 3 or 4. This changes the CTS by requiring two SRMs to be OPERABLE in MODES 3 and 4, and adding the Surveillances and ACTIONS associated with the added Applicability. | MODE 3 and 4 requirements in Table 3.3.1.2-1, 3.3.1.2 ACTION D, and SR 3.3.1.2.3, SR 3.3.1.2.4, SR 3.3.1.2.6, and SR 3.3.1.2.7 | None |
| 3.3.1.2<br>M.7 | CTS 3.3.B.4 and CTS 4.3.B.4 states, in part, that two SRMs are required to be OPERABLE when control rods are being withdrawn for startup. ITS Table 3.3.1.2-1 requires three SRMs to be OPERABLE in MODE 2 (Startup). Furthermore, the SRMs are required to be OPERABLE only when IRMs are on Range 2 or below. This changes the CTS by requiring 3 SRMs to be OPERABLE in MODE 2 when IRMs are on Range 2 or below. | MODE 2 requirements in Table 3.3.1.2-1 | 3.3.B.4, 4.3.B.4 |
| 3.3.1.2<br>M.8 | CTS 3.3.G.1, in part, requires the unit to be in cold shutdown in 24 hours if the conditions of CTS 3.3.B.4 are not met. ITS 3.3.1.2 ACTION C requires the unit to be in MODE 3 within 12 hours if the Required Action and Completion Time of Condition A or B are not met. This changes the CTS by requiring the plant to be in MODE 3 in 12 hours in lieu of being in MODE 4 in 24 hours. | 3.3.1.2 ACTION C | 3.3.G.1 |
| 3.3.2.1<br>M.1 | CTS Table 3.2.3 does not include any requirements for the Rod Block Monitor "Inop" Function. ITS Table 3.3.2.1-1, Function 1.d, requires the Rod Block Monitor-Inop Function be OPERABLE and specifies performance of ITS SR 3.3.2.1.1, a CHANNEL FUNCTIONAL TEST, every 92 days. This changes the CTS by adding requirements for a RBM Function that was not previously required. | Table 3.3.2.1-1 Function 1.d, SR 3.3.2.1.1 (for Function 1.d) | None |
| 3.3.2.1<br>M.2 | CTS Table 3.2.3 does not include any requirements for the "Reactor Mode Switch - Shutdown Position" Function. ITS 3.3.2.1 includes the LCO, Required Actions, and Surveillance Requirement for the Reactor Mode Switch - Shutdown Position Function consistent with the requirement of CTS 1.0.Y for a rod block to be inserted when the reactor mode switch is in the shutdown position. ITS Table 3.3.2.1-1 Function 3 requires two channels of the Reactor Mode Switch - Shutdown Position to be OPERABLE. ITS SR 3.3.2.1.7 requires performance of a CHANNEL FUNCTIONAL TEST every 24 months, and is modified by a Note which specifies the SR is not required to be performed until 1 hour after the reactor mode switch is in the shutdown | Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7 | 1.0.Y |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | position. ITS 3.3.2.1 ACTION E addresses the requirements for an inoperable Reactor Mode Switch - Shutdown Position. This changes the CTS by adding a Reactor Mode Switch - Shutdown Position Function, associated Surveillance, and ACTION not previously required. | | |
| 3.3.2.1<br>M.3 | ITS SR 3.3.2.1.6 requires verification that the RWM is not bypassed when THERMAL POWER is $\leq$ 10% RTP every 24 months. This specific Surveillance is not required by CTS. This changes the CTS by adding a Surveillance Requirement that was not previously required. | SR 3.3.2.1.6 | None |
| 3.3.2.1<br>M.4 | CTS 3.3.B.3.(b) requires the RWM to be OPERABLE in the startup or run mode below 10% rated thermal power. ITS Table 3.3.2.1-1 Function 2 requires the RWM to be OPERABLE in MODES 1 and 2 when $\leq$ 10% RTP. This changes the CTS by requiring the RWM to be OPERABLE at 10% instead of < 10% RTP. | Table 3.3.2.1-1 Function 2 | 3.3.B.3.(b) |
| 3.3.2.1<br>M.5 | CTS 4.3.B.3.(a)(iv) requires verifying the rod block function of the rod worth minimizer is OPERABLE whenever the reactor is in startup or run mode below 10% rated thermal power. However, no specific Frequency is provided. ITS 3.3.2.1 performs this verification using two Surveillance Requirements, each modified by a Note pertaining to the Applicability. ITS SR 3.3.2.1.2 requires performing a CHANNEL FUNCTIONAL TEST every 92 days, and is modified by a Note which specifies that this SR is not required to be performed until 1 hour after any control rod is withdrawn at $\leq$ 10% RTP in MODE 2. ITS SR 3.3.2.1.3 requires performing a CHANNEL FUNCTIONAL TEST every 92 days, and is modified by a Note which specifies that this SR is not required to be performed until 1 hour after THERMAL POWER is $\leq$ 10% RTP in MODE 1. This changes the CTS by specifying separate Surveillance Requirements at specific Surveillance Frequencies. | SR 3.3.2.1.2 including Note,<br>SR 3.3.2.1.3 including Note | 4.3.B.3.(a)(iv) |
| 3.3.2.2<br>M.1 | The CTS does not have any specific requirements for the Feedwater Pump and Main Turbine High Water Level Trip Instrumentation. ITS LCO 3.3.2.2 requires four channels of Feedwater Pump and Main Turbine High Water Level Trip Instrumentation to be OPERABLE. Appropriate ACTIONS and Surveillance Requirements are also provided. This changes the CTS by incorporating the requirements of ISTS 3.3.2.2. | 3.3.2.2 | None |
| 3.3.3.1<br>M.1 | CTS 3.14 is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.3.3.1 is applicable in MODES 1 and 2. This changes the CTS by requiring PAM instrumentation to be OPERABLE in MODE 2 even if reactor water temperature is less than or equal to 212˚F. Note there is a separate L.1 DOC associated with CTS 3.14. | 3.3.3.1 Applicability | 3.14 |
| 3.3.3.1<br>M.2 | CTS Table 3.14.1 does not require OPERABLE instrument channels for Reactor Vessel Pressure or Penetration Flow Path Primary Containment Isolation Valve (PCIV) Position. These are added to the CTS and specified in ITS Table 3.3.3.1-1, Functions 1 and 6 respectively. Two channels are provided for Reactor Vessel Pressure (Function 1). Two channels per penetration flow path are provided for Penetration Flow Path PCIV Position (Function 6), and is modified by two | Table 3.3.3.1-1 Functions 1 and 6 (including footnotes (a) and (b),<br>3.3.3.1 ACTIONS A, B, C, | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel per penetration flow path with one installed channel located in the control room. ITS 3.3.3.1 ACTION A has been added to cover the Condition when one or more Functions have one required channel inoperable, and allows 30 days to restore the required channel to OPERABLE status. If this cannot be met, then ITS 3.3.3.1 ACTION B requires the immediate initiation of the actions specified in Specification 5.6.4. ITS 3.3.3.1 ACTION C has been added to cover the Condition when one or more Functions have two required channels inoperable, and requires restoration of one channel to OPERABLE status within 7 days. If this cannot be met, then ITS 3.3.3.1 ACTION D must be entered, which will then require entry into ACTION E, which requires the plant to be in MODE 3 within 12 hours. A Note has been added to the ACTIONS to allow Separate Condition entry for each Function. Furthermore, SR 3.3.3.1.1 requires a CHANNEL CHECK every 31 days and SR 3.3.3.1.2 requires a CHANNEL CALIBRATION every 24 months for the channels. This changes the CTS by adding new Functions and applicable Footnotes, ACTIONS Note, ACTIONS, and SRs. | D, and E (for Functions 1 and 6), SR 3.3.3.1.1 and SR 3.3.3.1.2 (for Functions 1 and 6) | |
| 3.3.3.2<br>M.1 | CTS 3.13.A.1 states that the alternate shutdown system (ASDS) controls on the ASDS panel shall be OPERABLE "whenever that system or component is required to be OPERABLE." For the system and components covered by this Specification, the Applicability that covers the most conditions is whenever irradiated fuel is in the reactor vessel and the reactor water temperature is greater than 212˚F (i.e., the RHR pumps Applicability). In addition, when the restoration time provided by CTS 3.13.A.2.b has expired, CTS 3.13.A.2.d requires placing the reactor in a condition where the systems for which the system controls at the ASDS are inoperable are not required to be OPERABLE in 24 hours. ITS LCO 3.3.3.2 is applicable in MODES 1 and 2. Consistent with this Applicability change, ITS 3.3.3.2 ACTION B requires the plant to be in MODE 3 within 12 hours. This changes the CTS by requiring Alternate Shutdown System controls and instrumentation to be OPERABLE in MODE 2 when reactor water temperature is ≤ 212˚F and provides only 12 hours in lieu of 24 hours to exit the Applicability. | 3.3.3.2 Applicability,<br>3.3.3.2 ACTION B | 3.13.A.1,<br>3.13.A.2.d |
| 3.3.3.2<br>M.2 | CTS 3.13.A.2.a, b, and c, provide alternative actions and an allowance of up to 60 days before requiring a reactor shutdown if an inoperable Alternate Shutdown System control cannot be restored to an OPERABLE status within 7 days. ITS 3.3.3.2 does not provide these alternative Required Action allowances. This changes the CTS by deleting alternative actions and extended time allowances for inoperable Alternate Shutdown System controls. | None | 3.13.A.2.a, 3.13.A.2.b,<br>3.13.A.2.c |
| 3.3.3.2<br>M.3 | CTS 4.13.A does not specify a CHANNEL CHECK or CHANNEL CALIBRATION for required alternate shutdown system instrumentation channels. ITS SR 3.3.3.2.1 requires a CHANNEL CHECK of each required instrumentation channel that is normally energized every 31 days, and | SR 3.3.3.2.1,<br>SR 3.3.3.2.3 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ITS SR 3.3.3.2.3 requires a CHANNEL CALIBRATION of each required instrumentation channel every 24 months. This changes the CTS by adding SRs that were not previously required. | | |
| 3.3.4.1<br>M.1 | CTS Table 3.2.5 provides the Trip Setting for the ATWS-RPT Low-Low Reactor Water Level Function. However, it does not specify the requirements for the time delay relays associated with each ATWS-RPT Low-Low Reactor Water Level channel. ITS SR 3.3.4.1.4 requires the Allowable Value for the time delay relay portion of the ATWS-RPT Low-Low Reactor Water Level channels to be $\geq$ 6.0 seconds and $\leq$ 8.6 seconds and adds a Surveillance Requirement to perform a CHANNEL CALIBRATION every 184 days. This changes the CTS by providing explicit values for the time delay relays associated with the ATWS-RPT Low-Low Reactor Water Level channels and adding a Surveillance Requirement to perform a CHANNEL CALIBRATION every 184 days. | SR 3.3.4.1.4 | Table 3.2.5 Function 2 |
| 3.3.4.1<br>M.2 | CTS Table 3.2.5 Note 1 requires, when a trip system of one Function is inoperable and not restored within 14 days or if both trip systems of a Function are inoperable, the plant to be in a condition other than Run within 8 hours. Under the same conditions in the ITS, ITS 3.3.4.1 Required Action D.2 requires the plant to be in MODE 2 within 6 hours. This changes the CTS by reducing the time the plant must be in MODE 2 from 8 hours to 6 hours. | 3.3.4.1<br>Required Action D.2 | Table 3.2.5 Note 1 |
| 3.3.4.1<br>M.3 | CTS Table 4.2.1 requires the performance of a sensor check on the ATWS-RPT Reactor High Pressure channels "Once/Day." ITS SR 3.3.4.1.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by increasing the Surveillance Frequency from "Once/Day" to every "12 hours." | SR 3.3.4.1.1 | Table 4.2.1 (Recirculation Pump Trip) Function 1 |
| 3.3.4.1<br>M.4 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS 3.3.4.1 requires the performance of SR 3.3.4.1.6, a LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation every 24 months, for each ATWS-RPT Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST, including breaker actuation to be performed on each ATWS-RPT Function. | SR 3.3.4.1.6 | None |
| 3.3.5.1<br>M.1 | CTS 3.2.B requires the ECCS Instrumentation Functions in Table 3.2.2 to be OPERABLE when irradiated fuel is in the reactor vessel and the reactor water temperature is above 212˚F. ITS Table 3.3.5.1-1 requires the low pressure ECCS Instrumentation (ITS Table 3.3.5.1-1 requirements for Core Spray (CS) and Low Pressure Coolant Injection (LPCI) System) Functions to be OPERABLE in MODES 1, 2, and 3. In addition some Functions (ITS Table 3.3.5.1-1 Functions 1.a, 1.c, 1.d, 1.e, 1.f, 2.a, 2.c, 2.d, and 2.e) are required to be OPERABLE in MODE 4 and 5 when the associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, "ECCS - Shutdown." This changes the CTS by requiring the ECCS Instrumentation Functions to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F and in MODE 4 and 5 when the associated ECCS subsystem(s) are required to be OPERABLE. | Table 3.3.5.1-1 | 3.2.B |
| 3.3.5.1<br>M.2 | CTS Table 3.2.2 and Table 4.2.1 include requirements for ECCS Instrumentation. The Table does not include the requirements for the Core Spray Pump Start - Time Delay, LPCI Pump Start - | Table 3.3.5.1-1 Functions 1.f, 2.f, 2.g, 2.h, | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Time Delay, LPCI Pump Discharge Flow - Low (Bypass), LPCI Loop Select Logic, HPCI Suppression Pool Water Level - High, and HPCI Pump Discharge Flow - Low (Bypass) Functions. ITS LCO 3.3.5.1 and Table 3.3.5.1-1 Functions 1.f, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k, 2.l, 2.m, 3.e, and 3.f have been added to ensure the applicable ECCS Instrumentation is OPERABLE. Appropriate ACTIONS and Surveillances have been also added. This changes the CTS by adding the requirements for the specified Functions. | 2.i, 2.j, 2.k, 2.l, 2.m, 3.e, and 3.f | |
| 3.3.5.1<br>M.3 | CTS Table 3.2.8 Function C.1 (Condensate Storage Tank Low Level) requires entry into Required Condition C when the requirements of CTS Table 3.2.8 Notes 1.a and 1.b are not met. CTS Table 3.2.8 Required Condition C requires the HPCI suction to be aligned to the suppression pool. CTS Table 3.2.8 does not provide an alternate compensatory action if the HPCI suction cannot be aligned to the suppression pool. Under this condition, ITS 3.3.5.1 ACTION H requires the immediate declaration that the HPCI System is inoperable. This changes the CTS by providing an appropriate compensatory action if the Required Action is not met. | 3.3.5.1 ACTION H | Table 3.2.8 Required Condition C |
| 3.3.5.1<br>M.4 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.5.1-1 requires the performance of SR 3.3.5.1.8, a LOGIC SYSTEM FUNCTIONAL TEST, every 24 months, for each ECCS Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST to be performed on each ECCS Function. | SR 3.3.5.1.8 | None |
| 3.3.5.1<br>M.5 | CTS 3.2.D requires the specified HPCI Functions in Table 3.2.8 (HPCI High Reactor Level (Function B.1) and HPCI Condensate Storage Tank Low Level (Function C.1)) to be OPERABLE in the Run Mode. ITS Table 3.3.5.1-1 Functions 3.c and 3.d require the Functions to be OPERABLE in MODE 1 and MODES 2 and 3 with reactor steam dome pressure > 150 psig. This changes the CTS by requiring the HPCI Instrumentation Functions to be OPERABLE in MODES 2 and 3 with reactor steam dome pressure > 150 psig. | Table 3.3.5.1-1 Functions 3.c and 3.d | 3.2.D |
| 3.3.5.1<br>M.6 | CTS Table 3.2.2 Note 1 allows the ECCS High Drywell Pressure Functions (Functions A.1.c and B.1) to be bypassed during purging for containment inerting or de-inerting operations by closing the manual containment isolation valves. ITS Table 3.3.5.1-1 does not include this bypass allowance for the Drywell Pressure - High Functions (Functions 1.b, 2.b, and 3.b). This changes the CTS by deleting the allowance to bypass the Drywell Pressure - High Functions during containment purging operations. | None | Table 3.2.2 Note 1 |
| 3.3.5.1<br>M.7 | CTS Table 3.2.2 Note 3.(a) applies, in part, to the Reactor Low Pressure Permissive (Function A.1.b.i), Reactor Low Pressure Permissive Bypass Timer (Function A.1.b.ii), Low Reactor Pressure (Valve Permissive) (Function A.2), Auto Blowdown Timer (Function C.2), and Low Pressure Core Cooling Pumps Discharge Pressure Interlock (Function C.3) channels and, when a channel is inoperable, requires the channel or trip system to be placed in the tripped condition within 12 hours. CTS Table 3.2.8 Note 1.a applies to the High Reactor Level channels and, when | 3.3.5.1<br>ACTIONS C and G | Table 3.2.2<br>Note 3.(a),<br>Table 3,2,8 Note 1.a |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | a channel is inoperable, requires the channel or trip system be placed in the tripped condition within 12 hours. ITS 3.3.5.1 ACTION C applies to ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 1.e, 2.c, 2.d, 2.e, and 3.c and requires the channel to be restored to OPERABLE status within 24 hours. ITS 3.3.5.1 ACTION G applies to ITS Table 3.3.5.1-1 Functions 4.b, 4.c, 4.d, 5.b, 5.c, and 5.d and requires the channels to be restored to OPERABLE status in either 96 hours or 8 days. This changes the CTS by requiring the channel to be restored to OPERABLE status instead of requiring the inoperable channel or trip system to be placed in the tripped condition. The change in the Completion Time from 12 hours to 24 hours, 96 hours, or 8 days is discussed in DOC L.3. | | |
| 3.3.5.1<br>M.8<br><br>BSI 1.c. | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.2 specifies the "Trip Setting" for the ECCS instrumentation Functions. The Trip Settings of CTS Table 3.2.2 Function C.3 has been modified to reflect new Allowable Values as indicated for ITS Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and 5.d. This changes the CTS by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8. | Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and 5.d | Table 3.2.2 Function C.3 |
| 3.3.5.2<br>M.1 | CTS 3.2.D requires the specified RCIC System Instrumentation Functions in Table 3.2.8 to be OPERABLE in the Run Mode. ITS 3.3.5.2 requires the same Functions to be OPERABLE in MODE 1 and MODES 2 and 3 with reactor steam dome pressure > 150 psig. This changes the CTS by requiring the RCIC System Instrumentation Functions to be OPERABLE in MODES 2 and 3 with reactor steam dome pressure > 150 psig. | 3.3.5.2 Applicability | 3.2.D |
| 3.3.5.2<br>M.2 | CTS Table 3.2.8 Note 1.a applies to the High Reactor Level channels (CTS Table 3.2.8 Function B.1 HPCI/RCIC Turbine Shutdown for High Reactor Level). When a channel is inoperable, the note requires the channel or trip system be placed in the tripped condition within 12 hours. ITS 3.3.5.2 ACTION C requires the channel to be restored to OPERABLE status within 24 hours. This changes the CTS by requiring the channel to be restored to OPERABLE status instead of requiring the inoperable channel or trip system to be placed in the tripped condition. The change in the Completion Time from 12 hours to 24 hours is discussed in DOC L.1. | 3.3.5.2 ACTION C | Table 3.2.8 Note 1.a |
| 3.3.5.2<br>M.3 | CTS Table 3.2.8 Function C.1 (Condensate Storage Tank Low Level) requires entry into Required Condition C when the requirements of CTS Table 3.2.8 Notes 1.a and 1.b are not met. CTS Table 3.2.8 Required Condition C requires the RCIC suction to be aligned to the suppression pool. CTS Table 3.2.8 does not provide an alternate compensatory action if the RCIC suction cannot be aligned to the suppression pool. Under this condition, ITS 3.3.5.2 ACTION E requires the immediate declaration that the RCIC System is inoperable. This changes the CTS by providing an appropriate action if the Required Condition is not met. | 3.3.5.2 ACTION E | Table 3.2.8 Required Condition C |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.3.5.2 M.4 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.5.2-1 requires the performance of SR 3.3.5.2.5, a LOGIC SYSTEM FUNCTIONAL TEST every 24 months, for each RCIC System Instrumentation Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST to be performed on each RCIC System Instrumentation Function. | SR 3.3.5.2.5 | None |
| 3.3.6.1 M.1 | CTS 3.2.A is applicable whenever primary containment integrity is required. CTS 3.7.A.2.a.(1) requires the primary containment to be OPERABLE at all times when the reactor is critical or when the reactor water temperature is above 212˚F and fuel is in the reactor vessel. ITS Table 3.3.6.1-1 Primary Containment Isolation Functions, for the most part, are required to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the Primary Containment Isolation Instrumentation to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. Other changes to this Applicability are discussed in DOC M.2. | Table 3.3.6.1-1 Function 2 | 3.2.A |
| 3.3.6.1 M.2 | CTS Table 3.2.1 Function 2.a requires the Low Reactor Water Level Function channels to isolate the RHR System, including the RHR shutdown cooling supply isolation valves, whenever the primary containment is required to be OPERABLE. ITS Table 3.3.6.1-1 Function 6.b requires the Reactor Vessel Water Level - Low Function to be OPERABLE in MODES 4 and 5. However, ITS Table 3.3.6.1-1 Footnote (a) states that only one channel per trip system, with an isolation signal available to one shutdown cooling supply isolation valve, is required in MODES 4 and 5, provided RHR Shutdown Cooling System integrity is maintained. This changes the CTS by requiring the Function to be OPERABLE (i.e., for the RHR shutdown cooling supply isolation valves) during MODES 4 and 5 and providing appropriate actions if the Function is inoperable. | Table 3.3.6.1-1 Function 6.b including Footnote (a) | Table 3.2.1 Function 2.a |
| 3.3.6.1 M.3 | CTS Table 3.2.1 does not include any requirements for the Standby Liquid Control (SLC) System Initiation Function. ITS Table 3.3.6.1 Function 5.d requires the SLC System Initiation Function to be OPERABLE in MODES 1 and 2. If one or more channels are inoperable, ITS 3.3.6.1 ACTION A, B, or H will apply. ITS 3.3.6.1 ACTIONS A and B provide the same compensatory actions consistent with the other Primary Containment Isolation Functions. ITS 3.3.6.1 ACTION H requires, if the requirements of ACTIONS A and B are not met, either the declaration that the associated SLC subsystem is inoperable or the isolation of the Reactor Water Cleanup System within 1 hour. An appropriate Surveillance Requirement has also been added (ITS SR 3.3.6.1.6). This changes the CTS by adding the requirements associated with the SLC System Initiation Function. | Table 3.3.6.1-1 Function 5.d, 3.3.6.1 ACTION H, SR 3.3.6.1.6 | None |
| 3.3.6.1 M.4 | CTS Table 3.2.1 Note (5) allows the Group 2 High Drywell Pressure Function to be bypassed during purging for containment inerting or de-inerting operations by closing the manual containment isolation valves. ITS Table 3.3.6.1-1 does not include this bypass allowance for the Drywell Pressure - High Functions (Functions 2.b and 7.b). This changes the CTS by deleting the allowance to bypass the Drywell Pressure - High Functions during containment purging | None | Table 3.2.1 Note (5) |

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | operations. | | |
| 3.3.6.1<br>M.5 | If CTS Table 3.2.1 channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires the Required Condition specified in Table 3.2.1 for the associated Function to be taken. CTS Table 3.2.1 Required Condition A requires the Group 1 isolation valves to be closed. CTS Table 3.2.1 Required Condition B requires reactor power to be on IRM range or below, and the reactor in startup, refuel, or shutdown mode. CTS Table 3.2.1 Required Conditions C and D require the isolation of all shutdown cooling system valves. CTS Table 3.2.1 Required Condition E requires the isolation valves associated with the Reactor Water Cleanup System to be closed. CTS Table 3.2.1 Required Condition F requires isolation of HPCI steam lines. CTS Table 3.2.1 Required Condition G requires isolation of RCIC steam lines. However, no specific times to complete these actions are provided. CTS Table 3.2.1 Note (2)(c) states to meet the Required Conditions using normal operating procedures. ITS 3.3.6.1 Required Action D.1 requires the isolation of the associated main steam line (MSL) within 12 hours. ITS 3.3.6.1 ACTION E requires the unit to be in MODE 2 within 6 hours. ITS 3.3.6.1 ACTION F requires isolation of the affected penetration flow path(s) within 1 hour. ITS 3.3.6.1 ACTION G requires isolation of the affected penetration flow path(s) within 24 hours. This changes the CTS by adding specific Completion Times to reach the specified conditions. | 3.3.6.1<br>Required Action D.1,<br>3.3.6.1<br>ACTIONS E, F, and G | Table 3.2.1<br>Required Conditions A, B, C, D, E, F, and G;<br>Table 3.2.1 Note (2)(c) |
| 3.3.6.1<br>M.6 | If CTS Table 3.2.1 Functions 2.a or 2.b channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires the Required Condition specified in Table 3.2.1 for the associated Function to be taken. CTS Table 3.2.1 Required Condition C is taken for CTS Table 3.2.1 Function 2.a channels and CTS Table 3.2.1 Required Condition D is taken for CTS Table 3.2.1 Function 2.b channels. CTS Table 3.2.1 Required Condition C requires the isolation valves of RHR Shutdown Cooling System to be closed and CTS Table 3.2.1 Required Condition D requires compliance with Required Condition C, i.e., the isolation valves of RHR Shutdown Cooling System must also be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 ACTION F requires isolation of the affected penetration flow path(s) for the Primary Containment Isolation Functions (ITS Table 3.3.6.1-1 Functions 2.a and 2.b) and ITS 3.3.6.1 ACTION G requires isolation of the affected TIP penetration flow path(s) for the Traversing Incore Probe Isolation Functions (ITS Table 3.3.6.1-1 Functions 7.a and 7.b). This changes the CTS by requiring all affected penetrations to be isolated not just the RHR Shutdown Cooling System penetration. | 3.3.6.1 ACTIONS F and G | Table 3.2.1 Required Conditions C and D |
| 3.3.6.1 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. | SR 3.3.6.1.6 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| M.7 | ITS Table 3.3.6.1-1 requires the performance of SR 3.3.6.1.6, a LOGIC SYSTEM FUNCTIONAL TEST every 24 months, for each primary containment isolation instrument Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST on each primary containment isolation instrument Function. | | |
| 3.3.6.1<br>M.8 | CTS Table 4.1.1 Note 2 requires the performance of a sensor check of the Low Reactor Water Level channels once per day. ITS SR 3.3.6.1.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by changing the Frequency from once per "day" to "12 hours." | SR 3.3.6.1.1 | Table 4.1.1 Note 2 |
| 3.3.6.1<br>M.9<br><br>BSI 1.f | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.1 specifies the "Trip Settings" for the primary containment isolation instrumentation. The "Trip Settings" of CTS Table 3.2.1 Functions 3.d, 4.a, 4.b, 4.c, and 5.b have been modified to reflect new Allowable Values as indicated in ITS Table 3.3.6.1-1 Functions 3.a, 3.b, 3.c, 4.c, and 5.a. This changes the CTS by requiring the Primary Containment Isolation Functions to be set consistent with the new "Allowable Value." The change in the term "Trip Settings" to "Allowable Value" is discussed in DOC A.13. | Table 3.3.6.1-1 Functions 3.a, 3.b, 3.c, 4.c, and 5.a | Table 3.2.1 Functions 3.d, 4.a, 4.b, 4.c, and 5.b |
| 3.3.6.2<br>M.1 | CTS Table 4.2.1 for Reactor Building Ventilation and Standby Gas Treatment requires the performance of a sensor check for Instrument Channel 3, Radiation Monitors (Plenum), once per day and for Instrument Channel 4, Radiation Monitors (Refueling Floor), every 12 hours when fuel handling is in progress (as stated in CTS Table 4.2.1 Note (4)). ITS SR 3.3.6.2.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by increasing the Surveillance Frequency for Function 3 from once per day to every 12 hours and for Function 4 from when fuel handling is in progress to at all times when the Function is required to be OPERABLE. | SR 3.3.6.2.1 | Table 4.2.1 Reactor Building Ventilation and SGT System Instrument Channels 3 and 4 |
| 3.3.6.2<br>M.2 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.6.2-1 requires the performance of SR 3.3.6.2.6, a LOGIC SYSTEM FUNCTIONAL TEST every 24 months, for each secondary containment isolation instrumentation Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL to be performed on each secondary containment isolation instrumentation Function. | SR 3.3.6.2.6 | None |
| 3.3.6.3<br>M.1 | CTS 3.2.H requires the Low-Low Set (LLS) valves to be OPERABLE when CTS 3.6.E requires the S/RVs to be OPERABLE. CTS 3.6.E.1 requires the S/RVs to be OPERABLE "During power operating conditions and whenever reactor coolant pressure is greater than 110 psig and temperature is greater than 345˚F." CTS Table 3.2-7 Required Conditions A and B require | 3.3.6.3 Applicability,<br>3.3.6.3 ACTION B | 3.2.H,<br>3.6.E.1,<br>Table 3.2.7 Required Conditions A |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | reducing reactor coolant pressure to less than 110 psig and reactor water temperature to less than 345˚F within 24 hours if an inoperable trip system cannot be restored to OPERABLE status within the specified Completion Time of Required Condition A or two trip systems are inoperable. ITS LCO 3.3.6.3 is applicable in MODES 1, 2, and 3 and ITS 3.6.6.3 ACTION B requires the declaration that the associated LLS valve is inoperable. When ITS 3.6.1.5 ("LLS Valves") requires a plant shutdown, a shutdown to MODE 4 is required. This changes the CTS by requiring the LLS valves to be OPERABLE in MODE 2 £ 1% RATED THERMAL POWER (RTP) and in MODE 3 when reactor coolant pressure is less than 110 psig or temperature is less than 345˚F, and requires the unit to shutdown the plant to MODE 4 when a shutdown is required. | | and B |
| 3.3.6.3<br>M.2 | CTS Table 4.2.1 requires the performance of a sensor check on the S/RV LLS Logic Instrument Channels 2 and 3 "Once/day." ITS SR 3.3.6.3.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by increasing the Surveillance Frequency from "Once/day" to "12 hours." | SR 3.3.6.3.1 for Table 3.3.6.3-1 Function 2 | Table 4.2.1 S/RV LLS Logic Instrument Channels 2 and 3 |
| 3.3.6.3<br>M.3 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.6.3-1 requires the performance of SR 3.3.6.3.6, a LOGIC SYSTEM FUNCTIONAL TEST, every 24 months, for each LLS instrumentation Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST to be performed on each LLS instrumentation Function. | SR 3.3.6.3.6 | None |
| 3.3.6.3<br>M.4 | CTS Table 4.2.1 does not specify a requirement to perform a trip unit calibration on the S/RV LLS Logic Reactor Pressure - Opening (Instrument Channel 2) and Reactor Pressure - Closing (Instrument Channel 3) Functions. ITS Table 3.3.6.3-1 Function 2 requires the performance of SR 3.3.6.3.3, a trip unit calibration, every 92 days for each Low Low Set Pressure Setpoints Function. This changes the CTS by explicitly requiring a trip unit calibration to be performed on the Low Low Set Pressure Setpoints Function. | SR 3.3.6.3.3 | None |
| 3.3.6.3<br>M.5 | CTS Table 4.2.1 S/RV LLS Logic Instrument Channel 4 references Table 4.14.1 for the sensor check (i.e., CHANNEL CHECK) requirement. CTS Table 4.14.1 is the Post Accident Monitoring (PAM) Instrumentation Surveillance Requirement Table, and it requires a monthly sensor check. In addition, two Notes modify the sensor check requirement in CTS Table 4.14.1. CTS Table 4.14.1 Note (2) states that the sensor check consists of verifying that the pressure switches are not tripped and CTS Table 4.14.1 Note (4) states that following every S/RV actuation, it will be verified that recorder traces or computer logs indicate sensor responses. ITS SR 3.3.6.3.1 requires a CHANNEL CHECK on the Tailpipe Pressure Switch Function (ITS Table 3.3.6.3-1 Function 3) to be performed every 12 hours. This changes the CTS by increasing the | SR 3.3.6.3.1 for Table 3.3.6.2-1 Function 3 | Table 4.14.1 (S/RV Position (Pressure Switch) Function) including Notes (2) and (4) |

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Surveillance Frequency from "Once/month" to "12 hours." | | |
| 3.3.7.1<br>M.1 | CTS 3.2.I (Instrumentation for Control Room Habitability Protection) is required to be OPERABLE whenever the emergency filtration system is required to be OPERABLE by Specification 3.17.B. CTS 3.17.B is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F, during movement of recently irradiated fuel assemblies in the secondary containment, and during activities have the potential for draining the reactor vessel (as stated in CTS 3.17.B.1). ITS LCO 3.3.7.1 is applicable in MODES 1, 2, and 3, during movement of recently irradiated fuel assemblies in the secondary containment, and during operations with a potential for draining the reactor vessel (OPDRVs). This changes the CTS by requiring the CREF System instrumentation to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.3.7.1 Applicability | 3.2.I |
| 3.3.7.1<br>M.2 | CTS Table 3.2.9 Note (1) allows an instrument channels to be bypassed for testing or preventative maintenance for up to 8 hours. ITS 3.3.7.1 Surveillance Requirements Note provides a similar 8 hour allowance, but it is only applicable during Surveillance testing; it is not allowed for preventative maintenance purposes. This changes the CTS be deleting the 8 hour allowance to perform preventative maintenance. | 3.3.7.1 Surveillance Requirements Note | Table 3.2.9 Note (1) |
| 3.3.7.1<br>M.3 | CTS Table 4.2.1 requires the performance of a sensor check on the Control Room Radiation - High channels "Daily." ITS SR 3.3.7.1.1 requires the performance of a CHANNEL CHECK every 12 hours. This changes the CTS by increasing the Surveillance Frequency from "Daily" to every "12 hours." | SR 3.3.7.1.1 | Table 4.2.1 Control Room Habitability Protection Function 1 |
| 3.3.8.1<br>M.1 | CTS 3.2.G requires the essential bus Degraded Voltage and Loss of Voltage protection (Loss of Power (LOP)) Functions to be OPERABLE whenever the safeguards auxiliary electrical power system is required to be OPERABLE by Specification 3.9. CTS 3.9.A requires the AC sources to be OPERABLE when the reactor is critical. ITS LCO 3.3.8.1 requires the 4.16 kV Essential Bus Degraded Voltage and 4.16 kV Essential Bus Loss of Voltage Functions to be OPERABLE in MODES 1, 2, and 3, and whenever the associated emergency diesel generators (EDG) is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown." This changes the CTS by requiring the AC sources to be OPERABLE in MODE 2 when the reactor is not critical, in MODES 3, 4, and 5, and during movement of irradiated fuel assemblies in the secondary containment. | 3.3.8.1 Applicability | 3.2.G |
| 3.3.8.1<br>M.2 | CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. ITS Table 3.3.8.1-1 requires the performance of SR 3.3.8.1.4, a LOGIC SYSTEM FUNCTIONAL TEST, every 24 months for each LOP Instrumentation Function. This changes the CTS by explicitly requiring a LOGIC SYSTEM FUNCTIONAL TEST to be performed on each LOP Function. | SR 3.3.8.1.4 | None |
| 3.3.8.1 | *** THIS ITEM IS A BSI *** | Table 3.3.8.1-1 | Table 3.2.6 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| M.3<br><br>BSI 1.h | *** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.6 specifies the "Trip Setting" for the LOP Instrumentation. The Trip Settings of CTS Table 3.2.6 Function 1 have been modified to reflect new Allowable Values as indicated for ITS Table 3.3.8.1-1 Functions 2.a and 2.b. This changes the CTS by requiring the LOP Instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.6. | Functions 2.a and 2.b | Function 1 |
| 3.3.8.2<br>M.1 | CTS 3.1.C.2 and CTS 3.1.C.3 do not specify actions to take if an inoperable electric power monitoring channel(s) is not restored to OPERABLE status or the associated power supply(s) is not removed from service. Therefore, 10 CFR 50.36(c)(2) requires the unit to be shut down until the LCO is met. Thus, if any of the requirements of CTS 3.1.C.2 or 3.1.C.3 are not met, the unit is required to be shut down until CTS 3.1.C.1, 3.1.C.2, or 3.1.C.3 is met. In addition, no time limit in which to complete the unit shutdown is specified in 10 CFR 50.36(c)(2). ITS 3.3.8.2 ACTIONS C, D, E, and F have been added to place the unit in the appropriate conditions. When the Required Action and associated Completion Time of Condition A or B are not met in MODE 1, 2, or 3, ITS 3.3.8.2 ACTION C requires the unit to be in MODE 3 in 12 hours and MODE 4 within 36 hours. When any Required Action and associated Completion Time of Condition A or B are not met in MODE 4 or 5 with RHR SDC isolation valves open, ITS 3.3.8.2 ACTION D requires the immediate initiation of action to restore one electric power monitoring assembly to OPERABLE status for inservice power supply(s) supplying required instrumentation or immediate initiation of action to isolate the RHR SDC System. When any Required Action and associated Completion Time of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, ITS 3.3.8.2 ACTION E requires the immediate initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. When any Required Action and associated Completion Time of Condition A or B are not met during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVS, ITS 3.3.8.2 ACTION F requires the immediate isolation of the associated secondary containment penetration flow path(s) or the declaration that the associated secondary containment isolation valves are inoperable or, the placement of the associated SGT subsystem(s) in operation or, the declaration that the associated SGT subsystem(s) are inoperable, and the placement of the associated CREV subsystem(s) in operation or, the declaration that the associated CREV subsystem(s) are inoperable. This changes the CTS by adding finite times to shut down the unit when it is operating, and provides specific actions to take when the unit is already in the shutdown condition. | 3.3.8.2<br>ACTIONS C, D, E, and F | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.3.8.2<br>M.2 | CTS 4.1.C does not require a system functional test of the RPS Electric Power Monitoring assemblies. ITS SR 3.3.8.2.4 requires the performance of a system functional test every 24 months. This changes the CTS by explicitly requiring a system functional test to be performed on each RPS Electric Power Monitoring assembly. | SR 3.3.8.2.4 | None |
| 3.3.8.2<br>M.3<br><br>BSI 5 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS 4.1.C.2 requires an instrument calibration of each RPS power monitoring channel every "Operating Cycle." ITS SR 3.3.8.2.2 requires the performance of a CHANNEL CALIBRATION of the overvoltage, undervoltage, and underfrequency setpoints every 184 days. This changes the CTS increasing the frequency of performing a CHANNEL CALIBRATION of the overvoltage, undervoltage, and underfrequency setpoints. | SR 3.3.8.2.2 | 4.1.C.2 |
| 3.4.1<br>M.1<br><br>BSI 6 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS 4.5.F.1 provides a cross reference to the Surveillance Requirements in CTS 4.6.G. However, these Surveillances are jet pump Surveillances and do not cover stability monitoring issues. ITS SR 3.4.1.2 requires verification that either operation is in the Normal Region of the power to flow map every 24 hours or operation is in the Stability Buffer Region of the power to flow map and the power distribution controls specified in the COLR are in effect every 24 hours. This changes the CTS by deleting the cross references to the Surveillance requirements in CTS 4.6.G and adds a new Surveillance Requirement. | SR 3.4.1.2 | 4.6.G |
| 3.4.1<br>M.2 | ITS LCO 3.4.1 requires as one alternative, that two recirculation pumps "with matched flows" shall be in operation. If the requirements of this LCO are not met, ITS 3.4.1 ACTION B must be entered and the requirements of the LCO must be met within 24 hours (i.e., the unit is now operating in single loop and must meet the LCO 3.4.1 single loop requirements). ITS SR 3.4.1.1 requires the verification every 24 hours that jet pump loop flow mismatch with both recirculation loops in operation is: a. $\leq$ 10% of rated core flow when operating at < 70% of rated core flow; and b. $\leq$ 5% of rated core flow when operating at $\geq$ 70% of rated core flow. These requirements are not included in the CTS. This changes the CTS by adding the LCO requirement that two recirculation loops "with matched flows" shall be in operation, adds an ACTION to cover the | LCO 3.4.1,<br>3.4.1 ACTION B,<br>SR 3.4.1.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | condition when the flows are not matched, and adds a new Surveillance Requirement to verify every 24 hours that the mismatch criteria is met. | | |
| 3.4.2 M.1 | CTS 3.6.G requires all jet pumps to be OPERABLE in the "Run" mode. ITS LCO 3.4.2 requires the jet pumps to be OPERABLE in MODES 1 and 2. This changes the CTS by requiring the jet pumps to be OPERABLE in MODE 2. | 3.4.2 Applicability | 3.6.G |
| 3.4.2 M.2 | CTS 3.6.G requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.6.G is not met. ITS 3.4.2 ACTION A requires the unit to be in MODE 3 in 12 hours if ITS LCO 3.4.2 is not met. This changes the CTS by requiring the unit to be in a shutdown condition in 12 hours instead of 24 hours. The change to the unit condition required to be achieved (MODE 3 versus MODE 4) is discussed in DOC A.2. | 3.4.2 ACTION A | 3.6.G |
| 3.4.2 M.3 | CTS 4.6.G.1 requires the jet pumps to be demonstrated OPERABLE by verifying that the recirculation pump flow/speed ratio deviation from normal expected operating range does not exceed 5% and the jet pump loop/speed ratio deviation from normal expected operating range to not exceed 5%. CTS 4.6.G.2 states if either of these conditions are not met with pump speed greater than or equal to 60%, determine individual jet pump D/P percent deviation from average loop D/P and compare to the Limiting Conditions for Operation. If the pump speed is less than 60% and the deviation of the jet pump D/P exceeds the Limiting Conditions for Operation criteria, the jet pump D/P shall be monitored, and evaluated every 24 hours until such time as evaluation at the higher pump speed is made. CTS 3.6.G, the Limiting Conditions for Operation, in part, requires the individual jet pump diffuser to lower plenum differential pressure (D/P) percent deviation from average loop D/P to not differ by more than 20% deviation from its normal range of deviation. In addition, it states that if one or more jet pumps exceed the stated criteria, to evaluate the reason for the deviation, and in the circumstance that one or more of the jet pumps are determined to be inoperable, the unit is required to be placed in a cold shutdown condition. Thus the CTS allows, when pump speed is less than 60%, all the jet pump criteria of CTS 4.6.G.1 and CTS 3.6.G to not be met and operation to continue indefinitely. The CTS also allows, when pump speed is greater than or equal to 60%, all the jet pump criteria of CTS 4.6.G.1 and CTS 3.6.G to not be met and operation to continue provided an evaluation of the deviation is acceptable. ITS LCO 3.4.2 requires all jet pumps to be OPERABLE and all applicable criteria are stated in the ITS SR 3.4.2.1. The Surveillance allows either the criteria in CTS 4.6.G.1 or CTS 3.6.G to be met, consistent with the current allowances. However, the ITS does not allow continued operation with both criteria not met below 60% pump speed, and does not allow continued operation with both criteria not met when pump speed is greater than or equal to 60% provided an evaluation is performed. ITS 3.4.2 requires the jet pumps to be immediately declared inoperable and the unit shut down if both of the criteria are not met. This changes the CTS by not allowing continued operation under certain conditions when both of the jet pump criteria are not met. | SR 3.4.2.1 | 3.6.G, 4.6.G.1, 4.6.G.2 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.4.3<br>M.1 | CTS 3.6.E.1 requires the S/RVs to be OPERABLE "During power operating conditions and whenever reactor coolant pressure is greater than 110 psig and temperature is greater than 345˚F." CTS 3.6.E.2 states that if Specification 3.6.E.1 is not met, initiate an orderly shutdown and have reactor coolant pressure and temperature reduced to 110 psig or less and 345˚F or less. ITS LCO 3.4.3 is Applicable in MODES 1, 2, and 3 and ITS 3.4.3 ACTION B requires the unit to be in MODE 4. This changes the CTS by requiring the S/RVs to be OPERABLE in MODE 2 $\leq$ 1% RATED THERMAL POWER (RTP) and in MODE 3 when reactor coolant pressure is less than 110 psig or temperature is less than 345˚F" and requires the unit to exit these new MODES when a shutdown is required. | 3.4.3 Applicability,<br>3.4.3 ACTION B | 3.6.E.1,<br>3.6.E.2 |
| 3.4.3<br>M.2 | CTS 3.6.E.1 requires the S/RVs to be set at $\leq$ 1120 psig. ITS SR 3.4.3.1 states that the required S/RVs shall be set to 1109 $\pm$ 33.2 psig. In addition, this Surveillance states that following testing, lift settings shall be within $\pm$ 1%. This changes the CTS by providing an S/RV minimum setting. | SR 3.4.3.1 | 3.6.E.1 |
| 3.4.3<br>M.3 | ITS SR 3.4.3.2 requires the verification that each required S/RV opens when manually actuated every 24 months. A Note is included that allows this test to not be performed until 12 hours after reactor steam flow is adequate to perform the test. This Surveillance Requirement is not included in the CTS. This changes the CTS by adding a Surveillance Requirement to verify the required S/RVs can be manually actuated every 24 months. | SR 3.4.3.2 | None |
| 3.4.4<br>M.1 | CTS 3.6.D.1.a and CTS 4.6.D.1 are applicable any time irradiated fuel is in the reactor vessel and reactor water temperature is above 212˚F. ITS LCO 3.4.4 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the RCS Operational LEAKAGE to be within applicable limits in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.4.4 Applicability | 3.6.D.1.a,<br>4.6.D.1.a |
| 3.4.5<br>M.1 | CTS 3.6.D.2.a, CTS 3.6.D.2.b, and CTS 3.6.D.2.c are applicable any time irradiated fuel is in the reactor vessel and reactor water temperature is above 212˚F. ITS LCO 3.4.5 is Applicable in MODES 1, 2, and 3. This changes the CTS by requiring the RCS Leakage Detection Instrumentation to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.4.5 Applicability | 3.6.D.2.a,<br>3.6.D.2.b,<br>3.6.D.2.c |
| 3.4.6<br>M.1 | If the iodine concentration limits are not met, CTS 3.6.C.4 requires the unit to be shutdown. ITS 3.4.6 ACTION B also requires a unit shutdown (see DOC L.4 for the change related to when the unit shutdown commences), but also requires a periodic determination of DOSE EQUIVALENT I-131 every 4 hours while the unit is being shut down (ITS 3.4.6 Required Action B.1). This changes the CTS by requiring a periodic determination of DOSE EQUIVALENT I-131 to monitor any changes in specific activity during the unit shutdown. | 3.4.6<br>Required Action B.1 | 3.6.C.4 |
| 3.4.7<br>M.1 | The CTS does not have any requirements for the Residual Heat Removal (RHR) Shutdown Cooling System during hot shutdown operations. ITS LCO 3.4.7 requires two RHR shutdown cooling subsystems to be OPERABLE, and, with no recirculation pump in operation, at least one | 3.4.7 | None |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | RHR shutdown cooling subsystem shall be in operation. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.4.7. | | |
| 3.4.8<br>M.1 | The CTS does not have any requirements for the Residual Heat Removal (RHR) Shutdown Cooling System during cold shutdown operations. ITS LCO 3.4.8 requires two RHR shutdown cooling subsystems to be OPERABLE, and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.4.8. | 3.4.8 | None |
| 3.4.9<br>M.1 | CTS 3.6.A.2 states that the pump in an idle recirculation loop shall not be started unless the temperature of the coolant within the idle recirculation loop is within 50˚F of the reactor coolant temperature. However, no specific Surveillance Requirement exists to verify the limit is met prior to starting a recirculation pump. ITS SR 3.4.9.3 includes a requirement to verify the limit specified in CTS 3.6.A.2 is met "Once within 15 minutes prior to each startup of a recirculation pump." This changes the CTS by adding a specific Surveillance Requirement. | SR 3.4.9.3 | None |
| 3.4.9<br>M.2 | CTS 3.6.A.1 includes a limit for average rate of reactor coolant temperature change during normal heatup and cooldown. CTS 3.6.A.2 includes a limit for the differential temperature between an idle recirculation loop and the reactor coolant temperature prior to an idle recirculation loop startup. CTS 3.6.B includes limitations on the reactor vessel temperature and pressure during various plant conditions. There are no specified actions to take when the limitations are not met. Therefore, 10 CFR 50.36(c)(2) requires the unit to be shut down until the LCO is met. Thus, if any of the limitations of CTS 3.6.A.1, 3.6.A.2, or 3.6.B are not met, the unit is required to be shut down until the limitation not being met is back within limits. In addition, no time limit in which to complete the unit shutdown is specified in 10 CFR 50.36(c)(2). ITS 3.4.9 ACTION A covers the condition when the requirements of the LCO are not met in MODE 1, 2, or 3, and requires the restoration of the parameters to within limit(s) within 30 minutes and a determination that the RCS is acceptable for continued operation within 72 hours. The action to determine whether the RCS is acceptable for continued operation must be completed even if the requirements of the LCO are restored to within limits. If these actions are not met, ITS 3.4.9 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. ITS 3.4.9 ACTION C covers the condition when the requirements of the LCO are not met in conditions other than MODES 1, 2, and 3, and requires the immediate initiation of action to restore the parameters to within limit(s) and the determination that the RCS is acceptable for continued operation prior to entering MODE 2 or 3. The action to determine whether the RCS is acceptable for continued operation must be completed even if the requirements of the LCO are restored to within limits. This changes the CTS by adding finite times to shut down the unit when it is operating, and provides specific actions | 3.4.9<br>ACTIONS A, B, and C | None |

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | to take when the unit is already in the shutdown condition. | | |
| 3.4.9<br>M.3 | CTS 3.6.B.3 includes P/T limits during all operation with a critical reactor. However, there is no specific Surveillance Requirement for verification that the RCS pressure and temperature are within the P/T limits prior to criticality. ITS SR 3.4.9.2 requires a verification that the RCS pressure and temperature are within the criticality limits once (ITS Figure 3.4.9-4) within 15 minutes prior to control rod withdrawal for the purpose of achieving criticality. This changes the CTS by adding a specific Surveillance Requirement to verify the criticality limits are met. | SR 3.4.9.2 | None |
| 3.4.9<br>M.4 | CTS 3.6.B.2 states that the P/T limits in Figure 3.6.3 apply during low power physics tests and CTS 3.6.B.3 states that the P/T limits of Figure 3.6.4, which provides the criticality P/T limits, do not apply during low power physics tests. ITS SR 3.4.9.2 will require the criticality P/T limits provided in ITS Figure 3.4.9-4 to apply during low power physics test. This changes the CTS by applying the criticality P/T limits in lieu of the non-criticality P/T limits during low power physics tests. | SR 3.4.9.2 | 3.6.B.2,<br>3.6.B.3 |
| 3.4.9<br>M.5 | CTS 4.6.B.1 requires recording various temperatures during inservice hydrostatic testing or leak testing only "when the vessel pressure is above 312 psig." ITS SR 3.4.9.1.a will require verifying the temperatures "at all times" during inservice hydrostatic testing or leak testing. This changes the CTS by requiring the temperature verification "at all times" during inservice hydrostatic testing and leak testing, which includes when the reactor vessel pressure is less than or equal to 312 psig. The change to require a verification in lieu of recording the temperatures is discussed in DOC L.2. | SR 3.4.9.1.a | 4.6.B.1 |
| 3.4.10<br>M.1 | The CTS does not have any requirements for Reactor Steam Dome Pressure. ITS LCO 3.4.10 requires reactor steam dome pressure to be ≤ 1025.3 psig. This changes the CTS by incorporating the requirements of ITS 3.4.10. Appropriate ACTIONS and a Surveillance Requirement are also provided. | 3.4.10 | None |
| 3.5.1<br>M.1 | CTS 3.5.A.1 is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is above 212˚F. ITS LCO 3.5.1 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the Core Spray (CS) System and the Low Pressure Coolant Injection mode of the Residual Heat Removal (RHR) System is to be OPERABLE in MODE 2, when reactor water temperature is less than or equal to 212˚F. | 3.5.1 Applicability | 3.5.A.1 |
| 3.5.1<br>M.2 | CTS 3.5.A.3.c covers the condition associated with one low pressure pump or valve associated with CS or LPCI being inoperable with an ADS valve inoperable. CTS 3.5.A.3.c allows this condition to exist for 7 days before commencing a reactor shutdown. Under similar inoperabilities, ITS 3.5.1 ACTION K requires restoration of either the inoperable ADS valve or low pressure ECCS injection/spray subsystem(s) to OPERABLE status in 72 hours. This changes the CTS by | 3.5.1 ACTION K | 3.5.A.3.c |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | reducing the restoration time from 7 days to 72 hours. | | |
| 3.5.1<br>M.3 | CTS 3.5.A.3.i allows 12 hours to restore two or more ADS valves to OPERABLE status prior to commencing a reactor shutdown. The ITS does not allow any restoration time prior to requiring a unit shutdown. ITS 3.5.1 ACTION L provides the actions for two or more inoperable ADS valves and requires the unit to be in MODE 3 in 12 hours and to reduce reactor steam dome pressure to ≤ 150 psig within 36 hours. This changes the CTS by deleting the 12 hour restoration time when two or more ADS valves are inoperable. | 3.5.1 ACTION L | 3.5.A.3.i |
| 3.5.1<br>M.4 | CTS 4.5.A.3.a requires the quarterly HPCI pump flow test to be performed at a reactor pressure of ≤ 1120 psig and ≥ 950 psig. ITS SR 3.5.1.8 requires the same test to be performed at a reactor steam dome pressure of ≤ 1025.3 psig and ≥ 950 psig. This changes the CTS by reducing the upper pressure limit from 1120 psig to 1025.3 psig. | SR 3.5.1.8 | 4.5.A.3.a |
| 3.5.1<br>M.5 | CTS 4.5.A.4 requires the performance of an "ADS Valve Operability" test by cycling each ADS valve and observing a compensatory turbine bypass or control valve position. ITS SR 3.5.1.12 requires the same test to be performed, however a Note is included that states that the test is "Not required to be performed until 12 hours after reactor steam pressure and flow low are adequate to perform the test." This changes the CTS by providing a time limit for when the Surveillance must be completed. | SR 3.5.1.12 Note | 4.5.A.4 |
| 3.5.1<br>M.6 | ITS SR 3.5.1.1 requires verification, for each low pressure ECCS injection/spray subsystem, that the piping is filled with water from the pump discharge valve to the injection valve every 31 days. ITS SR 3.5.1.2 requires verification that each ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position is in the correct position every 31 days. ITS SR 3.5.1.3 requires verification that the ADS pneumatic pressure for each required ADS supply is within the specified limits every 31 days. ITS SR 3.5.1.5 requires verification of correct breaker alignment to the LPCI swing bus every 31 days. ITS SR 3.5.1.6 requires verification that each recirculation pump discharge valve cycles through one complete cycle of full travel or is de-energized in the closed position in accordance with the Inservice Testing Program. ITS SR 3.5.1.13 requires verification of the automatic transfer capability of the LPCI swing bus power supply from the normal source to the backup source every 24 months. These Surveillances are not in the CTS. This changes the CTS by adding these Surveillance Requirements to the Technical Specifications. | SR 3.5.1.1,<br>SR 3.5.1.2,<br>SR 3.5.1.3,<br>SR 3.5.1.5,<br>SR 3.5.1.6,<br>SR 3.5.1.13 | None |
| 3.5.1<br>M.7 | CTS 3.5.B specifies requirements for the RHR intertie return line isolation valves. CTS 3.5.B.1 requires these valves to be OPERABLE whenever the mode switch is in Run. To be considered OPERABLE, each valve must be capable of automatic closure on a LPCI initiation signal or be in the closed position. In addition, flow is not permitted to be established in the RHR intertie line with the reactor in MODE 1. ITS LCO 3.5.1 requires the LPCI System to be OPERABLE. | LCO 3.5.1,<br>SR 3.5.1.4 | 3.5.B,<br>3.5.B.1 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ITS SR 3.5.1.4 requires verification that the RHR System intertie return line isolation valves are closed every 31 days. A Note is included that states that this Surveillance Requirement is only required to be met in MODE 1. This changes the CTS by including the OPERABILITY of the RHR intertie valves as part of LPCI OPERABILITY and by requiring verification that the RHR System intertie return line isolation valves are closed every 31 days. It also deletes the allowance that the valve can be considered OPERABLE if the valve is capable of automatic closure on a LPCI initiation signal. | | |
| 3.5.2<br>M.1 | CTS 3.5.E.1, in part, allows all low pressure ECCS to be inoperable when irradiated fuel is in the reactor vessel and reactor water temperature is less than 212˚F, provided no operations with the potential for draining the reactor vessel (OPDRV) are being done except as allowed in Specification 3.5.E.2. ITS LCO 3.5.2 requires two low pressure ECCS injection/spray subsystems to be OPERABLE at all times while in MODE 4, and in MODE 5 except when the spent fuel storage pool gates are removed and water level is ≥ 21 ft 11 inches over the top of the reactor pressure vessel flange. In addition, ITS 3.5.2 includes actions to be taken when one or more low pressure ECCS subsystems are inoperable, even if OPDRVs are not being performed. ITS 3.5.2 Required Action C.2 requires one required low pressure ECCS subsystem to be restored to OPERABLE status in 4 hours if both required low pressure ECCS subsystems are inoperable. If this Required Action and associated Completion Time are not met (i.e., both required low pressure ECCS subsystems remain inoperable after the 4 hour time limit expires), then ITS 3.5.2 ACTION D requires immediate initiation of action to restore: a) secondary containment to OPERABLE status (ITS 3.5.2 Required Action D.1); b) one standby gas treatment (SGT) subsystem to OPERABLE status (ITS 3.5.2 Required Action D.2); and c) isolation capability in each required secondary containment penetration flow path not isolated (ITS 3.5.2 Required Action D.3). This changes the CTS by requiring ECCS low pressure subsystems be OPERABLE in the above MODES regardless of the status of the OPDRVs and provides compensatory actions if the requirements are not met. | LCO 3.5.2,<br>3.5.2 Applicability,<br>3.5.2 Required Action C.2,<br>3.5.2 ACTION D | 3.5.E.1 |
| 3.5.2<br>M.2 | CTS 3.5.E.1, in part, provides requirements for low pressure ECCS when there is irradiated fuel in the reactor vessel and reactor water temperature is less than 212˚F (i.e., during Cold Shutdown and Refueling conditions). ITS 3.5.2 provides the requirements for the low pressure ECCS subsystems in MODE 4 and MODE 5. This changes the CTS by requiring low pressure ECCS requirements to be met at 212˚F. | 3.5.2 Applicability | 3.5.E.1 |
| 3.5.2<br>M.3 | Currently, no Surveillances are provided in the CTS to verify OPERABILITY of the low pressure ECCS subsystems in MODES other than MODES 1, 2, and 3, except for the suppression pool water level requirements specified in CTS 4.7.A.1.e. ITS SR 3.5.2.2 requires verification, for each required ECCS injection/spray subsystem, the piping is filled with water from the pump discharge valve to the injection valve every 31 days. ITS SR 3.5.2.3 requires verification that each required | SR 3.5.2.2,<br>SR 3.5.2.3,<br>SR 3.5.2.4,<br>SR 3.5.2.5 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position is in the correct position every 31 days. ITS SR 3.5.2.4 requires verification that each required low pressure ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor to containment pressure in accordance with the Inservice testing Program. ITS SR 3.5.2.5 requires verification that each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal every 24 months. This changes the CTS by adding these Surveillance Requirements to the Technical Specifications. | | |
| 3.5.2<br>M.4 | CTS 3.7.A.1, in part, requires the suppression pool volume to be met while work is being done which has the potential to drain the vessel, except as permitted by Specification 3.5.E.2. ITS SR 3.5.2.1.a requires the suppression pool water level to be met at all times while in MODE 4, and in MODE 5 except when the spent fuel storage pool gates are removed and water level is ≥ 21 ft 11 inches over the top of the reactor pressure vessel flange. This changes the CTS by requiring the suppression pool requirements to be met in the above MODES regardless of the status of the OPDRVs. | SR 3.5.2.1.a | 3.7.A.1 |
| 3.5.2<br>M.5 | When the suppression pool water limit is not met, CTS 3.7.A.1.e allows 2 hours to restore the level within limits before requiring entry in CTS 3.7.A.1.f. CTS 3.7.A.1.f requires the suspension of all OPDRVs. ITS 3.5.2 does not include an explicit condition for this condition however entry into ITS 3.5.2 ACTION C would be required if the condensate storage tank(s) are not available. ITS 3.5.2 ACTION C covers the condition for two required ECCS injection/spray subsystem inoperable, and requires the immediate initiation of action to suspend OPDRVs and requires one required ECCS injection/spray subsystem to be restored to OPERABLE status within 4 hours. If one ECCS injection/spray subsystem cannot be restored within 4 hours entry in ITS 3.5.2 ACTION D is required. ITS 3.5.2 ACTION D requires immediate initiation of action to restore: a) secondary containment to OPERABLE status (ITS 3.5.2 Required Action D.1); b) one standby gas treatment (SGT) subsystem to OPERABLE status (ITS 3.5.2 Required Action D.2); and c) isolation capability in each required secondary containment penetration flow path not isolated (ITS 3.5.2 Required Action D.3). This changes the CTS by requiring the immediate initiation of action to stop OPDRVs instead of allowing two hours when the suppression pool water level is not within limit, it adds a Required Action to restore one ECCS injection/spray subsystem to OPERABLE status within 4 hours when the suppression pool water level is not within limit, and adds the ACTIONS associated with the secondary containment. The addition, of the allowance to credit the condensate storage tank(s) as a source for ECCS is discussed in DOC L.4. | 3.5.2 Required Action C.2, 3.5.2 ACTION D | 3.7.A.1.f |
| 3.5.2<br>M.6 | CTS 4.7.A.1.e requires the suppression pool water level limit to be verified "once per day." ITS SR 3.5.2.1 requires the same verification every 12 hours. This changes the CTS by increasing | SR 3.5.2.1 | 4.7.A.1.e |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | the Frequency from "once per day" to every "12 hours." The option to credit the condensate storage tank instead of the suppression pool is discussed in DOC L.4. | | |
| 3.5.2<br>M.7 | CTS 3.5.E.1, in part, allows all low pressure ECCS to be inoperable provided no work is being done which has the potential for draining the reactor vessel (OPDRV), except as allowed in Specification 3.5.E.2. However, when OPDRVs are in progress it does not explicitly specify how many low pressure ECCS subsystems are required to be OPERABLE. One OPERABLE low pressure ECCS subsystem satisfies the requirements of CTS 3.5.E.1. ITS LCO 3.5.2 requires two low pressure ECCS injection/spray subsystems to be OPERABLE. This changes the CTS by increasing the number of low pressure ECCS subsystems that are required to be OPERABLE from one to two. A change to the Applicability of CTS 3.5.E.1 is discussed in DOC M.1. | LCO 3.5.2 | 3.5.E.1 |
| 3.5.2<br>M.8 | CTS 3.5.E.2 does not require any ECCS to be OPERABLE as long as the spent fuel pool gates are open and the fuel pool water level is greater than or equal to 33 ft. ITS 3.5.2 includes the same allowances, but the water level must be maintained at $\geq$ 21 ft 11 inches over the top of the reactor pressure vessel flange. This changes the CTS by increasing the water level requirement by 4 ft (i.e., 21 ft 11 inches over the top of the reactor pressure vessel flange is equivalent to a water level of 37 ft in the spent fuel pool as long as the spent fuel pool gates are removed). | 3.5.2 Applicability | 3.5.E.2 |
| 3.5.3<br>M.1 | CTS 4.5.D.1.a requires the quarterly RCIC pump flow test to be performed at a reactor pressure of $\leq$ 1120 psig and $\geq$ 950 psig. ITS SR 3.5.3.2 requires the same test to be performed at a reactor steam dome pressure of $\leq$ 1025.3 psig and $\geq$ 950 psig. This changes the CTS by reducing the upper pressure limit from 1120 psig to 1025.3 psig. | SR 3.5.3.2 | 4.5.D.1.a |
| 3.5.3<br>M.2 | ITS SR 3.5.3.1 requires verification that each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position is in the correct position every 31 days. This Surveillance is not in the CTS. This changes the CTS by adding this Surveillance Requirement to the Technical Specifications. | SR 3.5.3.1 | None |
| 3.6.1.1<br>M.1 | CTS 3.7.A.2.a.(1) is applicable at all times when the reactor is critical or when the reactor water temperature is above 212˚F and fuel is in the reactor vessel. ITS 3.6.1.1 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the Primary Containment to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.1.1 Applicability | 3.7.A.2.a.(1) |
| 3.6.1.1<br>M.2 | CTS 4.7.A.4.a.(2) requires the drywell to suppression chamber leakage to be demonstrated once each operating cycle. ITS SR 3.6.1.1.2 requires performance of a similar test at a similar Frequency, but also requires the test every 12 months if two consecutive tests fail, and continues | SR 3.6.1.1.2 | 4.7.A.4.a.(2) |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | at this 12 month Frequency until two consecutive tests pass. This changes the CTS by requiring an increased Surveillance Frequency upon two consecutive test failures. | | |
| 3.6.1.1<br>M.3 | CTS 3.7.A.2.a.(2) states that the Primary Containment Integrity is not required when performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t). The ITS does not include this allowance. This changes the CTS by deleting the allowance to not require Primary Containment Integrity (changed to Primary Containment OPERABILITY as described in DOC A.2) during certain low power physics tests. | None | 3.7.A.2.a.(2) |
| 3.6.1.2<br>M.1 | When the primary containment air lock is inoperable, CTS 3.7.A.2.c requires maintaining an air lock door closed, and restoration of the inoperable air lock within 24 hours. Under the same condition, ITS 3.6.1.2 ACTION C not only requires similar actions (as modified by DOC L.1) but also specifies an additional Required Action. Required Action C.1 requires the immediate initiation of action to evaluate overall containment leakage rate per LCO 3.6.1.1, using current air lock test results. This changes the CTS by adding a new Required Action. | 3.6.1.2 ACTION C | 3.7.A.2.c |
| 3.6.1.3<br>M.1 | CTS 3.7.D.1 requires the automatic PCIVs and excess flow check valves to be OPERABLE during reactor power operating conditions (i.e., $>$ 1% RATED THERMAL POWER (RTP)). ITS LCO 3.6.1.3 requires the PCIVs to be OPERABLE in MODES 1, 2, and 3, and when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation." ITS 3.6.1.3 also includes ACTIONS (ACTIONS A, B, and F) to cover the new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1" (i.e., during MODES 4 and 5). This changes the CTS by requiring the PCIVs to be OPERABLE in MODE 2 when $\leq$ 1% RTP, in MODE 3, and in MODES 4 and 5 when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, and by additional ACTIONS. | 3.6.1.3 Applicability, 3.6.1.3 ACTIONS A, B, and F | 3.7.D.1 |
| 3.6.1.3<br>M.2 | CTS 3.7.A.2.a.(1) requires the Primary Containment Integrity as defined in Section 1 to be maintained and is applicable at all times when the reactor is critical or when the reactor water temperature is above 212˚F and fuel is in the reactor vessel. The Primary Containment Integrity definition requires all manual primary containment isolation valves that are not required to be open during accident conditions to be closed. ITS 3.6.1.3 is applicable in MODES 1, 2, and 3 for these valves. This changes the CTS by requiring the manual PCIVs to be OPERABLE in MODE 2 when the reactor water temperature is less than or equal to 212˚F. | 3.6.1.3 Applicability | 3.7.A.2.a.(1) |
| 3.6.1.3<br>M.3 | CTS 4.7.D.1.a requires the measurement of the closure times of all power operated and automatically initiated PCIVs. ITS SR 3.6.1.3.6 requires verification that the isolation time of each MSIV is $\geq$ 3 seconds and $\leq$ 9.9 seconds. This changes the CTS by specifying the explicit acceptance criteria for the MSIV isolation time. | SR 3.6.1.3.6 | 4.7.D.1.a |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | | | |
| 3.6.1.3<br>M.4 | CTS 4.7.D does not provide any specific testing requirements for the traversing incore probe (TIP) shear isolation valve explosive squib. ITS SR 3.6.1.3.4 requires a verification of continuity of the TIP shear isolation valve explosive charge every 31 days and ITS SR 3.6.1.3.10 requires the removal and testing of the explosive squib from each shear isolation valve of the TIP System every 24 months on a STAGGERED TEST BASIS. This changes the CTS by requiring two new Surveillance Requirements for verifying TIP shear isolation valve explosive squib OPERABILITY. | SR 3.6.1.3.4,<br>SR 3.6.1.3.10 | None |
| 3.6.1.3<br>M.5 | CTS 3.7.D.3 requires the 18 inch primary containment purge and vent valves to be closed except during certain allowed conditions and to be equipped with 40 degree limit stops. However, no Surveillance Requirements are provided to periodically verify these requirements. ITS SR 3.6.1.3.1 requires a 31 day verification that the 18 inch primary containment purge and vent valves are closed (except under certain allowed conditions) and ITS SR 3.6.1.3.9 requires a 24 month verification that each 18 inch primary containment purge and vent valve is blocked to restrict the valve from opening > 40 degrees. This changes the CTS by adding two new Surveillance Requirements for verifying the OPERABILITY of the 18 inch primary containment purge and vent valves. | SR 3.6.1.3.1,<br>SR 3.6.1.3.9 | None |
| 3.6.1.3<br>M.6 | While CTS 1.0 provides requirements for manual and non-automatic valves, the CTS does not provide any specific testing requirements for the manual and non-automatic PCIVs. ITS SR 3.6.1.3.2 requires a verification that each primary containment manual valve and blind flange that is located outside primary containment and not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed every 31 days. ITS SR 3.6.1.3.3 requires a verification that each primary containment manual valve and blind flange that is located inside primary containment and not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days. In addition, both these Surveillances are modified by two Notes that allow valves and blind flanges in high radiation areas to be verified by use of administrative means and allows PCIVs to be open under administrative controls. This changes the CTS by requiring two new Surveillance Requirements for verifying the OPERABILITY of manual and non-automatic PCIVs. | SR 3.6.1.3.2,<br>SR 3.6.1.3.3 | None |
| 3.6.1.3<br>M.7 | CTS 3.7.D.4 requires the unit to be placed in the cold shutdown condition within 24 hours if Specifications 3.7.D.1, 3.7.D.2, and 3.7.D.3 cannot be met. However, CTS 3.7.D.1, 3.7.D.2, and 3.7.D.3 are only applicable in the reactor power operating conditions (i.e., > 1% RTP). Thus the unit is only required to be $\leq$ 1% RTP in 24 hours. ITS 3.6.1.3 ACTION E requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the CTS by requiring the unit to be | 3.6.1.3 ACTION E | 3.7.D.4 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | in MODE 3 in 12 hours and in cold shutdown (i.e., MODE 4) in 36 hours, in lieu of being $\leq$ 1% RTP in 24 hours. | | |
| 3.6.1.4<br>M.1 | The CTS does not have any requirements for Drywell Air Temperature. ITS LCO 3.6.1.4 requires drywell average air temperature to be $\leq$ 135˚F. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.6.1.4. | 3.6.1.4 | None |
| 3.6.1.5<br>M.1 | CTS 3.2.H requires the Low-Low Set (LLS) valves to be OPERABLE when CTS 3.6.E requires the S/RVs to be OPERABLE. CTS 3.6.E.1 requires the S/RVs to be OPERABLE "during power operating conditions and whenever reactor coolant pressure is greater than 110 psig and temperature is greater than 345˚F." CTS Table 3.2-7 Required Condition C requires reducing reactor coolant pressure to less than 110 psig and temperature to less than 345˚F within 24 hours if an inoperable LLS valve cannot be restored to OPERABLE status. ITS LCO 3.6.1.5 is applicable in MODES 1, 2, and 3 and ITS 3.6.1.5 ACTION B requires the unit to be in MODE 4. This changes the CTS by requiring the LLS valves to be OPERABLE in MODE 2 $\leq$ 1% RATED THERMAL POWER (RTP) and in MODE 3 when reactor coolant pressure is less than 110 psig and temperature is less than 345˚F, and requires the unit to exit these new MODES of Applicability when a shutdown is required. | 3.6.1.5 Applicability, ACTION B | 3.2.H, Table 3.2-7 Required Condition C, 3.6.E.1 |
| 3.6.1.5<br>M.2 | ITS SR 3.6.1.5.1 requires verification that each required LLS valve opens when manually actuated every 24 months on a STAGGERED TEST BASIS for each valve solenoid. A Note is included that allows this test to not be performed until 12 hours after reactor steam dome flow is adequate to perform the test. This Surveillance Requirement is not included in the CTS. This changes the CTS by adding a Surveillance Requirement to verify the LLS valves can be manually actuated every 24 months. | SR 3.6.1.5.1 | None |
| 3.6.1.5<br>M.3 | ITS SR 3.6.1.5.2 requires verification that the LLS System actuates on an actual or simulated automatic initiation signal every 24 months. A Note is included that valve actuation may be excluded. This Surveillance Requirement is not included in the CTS. This changes the CTS by adding a Surveillance Requirement to verify the LLS System actuates automatically by an actual or simulated automatic initiation signal every 24 months. | SR 3.6.1.5.2 | None |
| 3.6.1.5<br>M.4 | CTS Table 3.2-7 Note 1 requires three LLS valves to be OPERABLE, however, CTS Table 3.2-7 Condition C only provides actions for when one LLS valve is inoperable. There are no specified actions to take when two or more LLS valves are inoperable. Therefore, 10 CFR 50.36(c)(2) requires the unit to be shut down until the LCO is met. In addition, no time limit in which to complete the unit shutdown is specified in 10 CFR 50.36(c)(2). ITS LCO 3.6.1.5 ACTION B covers the condition when two or more LLS valves are inoperable (second part of Condition B), and it requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the | 3.6.1.5 ACTION B | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | CTS by adding finite times to shut down the unit when it is operating. | | |
| 3.6.1.6<br>M.1 | CTS 3.7.A.3.a is applicable when Primary Containment Integrity is required. CTS 3.7.A.2.a.(1), specifies that Primary Containment Integrity is required at all times when the reactor is critical or when reactor water temperature is above 212˚F and fuel is in the reactor vessel. ITS 3.6.1.6 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the reactor building-to-suppression chamber vacuum breakers to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.1.6 Applicability | 3.7.A.3.a |
| 3.6.1.6<br>M.2 | ITS SR 3.6.1.6.1 requires verification that each vacuum breaker is closed every 14 days. Two Notes are included that specify the Surveillance is not required to be met if 1) the vacuum breakers are open during Surveillances; or 2) if the vacuum breakers are open when performing their intended function. This Surveillance Requirement is not included in the CTS. This changes the CTS by adding a Surveillance Requirement to verify each vacuum breaker is closed every 14 days. | SR 3.6.1.6.1 | None |
| 3.6.1.6<br>M.3 | CTS 3.7.A.3.b allows seven days to restore one reactor building-to-suppression chamber vacuum breaker found inoperable for any reason. Under similar inoperabilities, ITS 3.6.1.6 ACTIONS A and C provide 72 hours to restore the inoperable vacuum breaker(s) (i.e., one of the two vacuum breakers in a line open or one or two vacuum breakers in a line inoperable for opening) to OPERABLE status. This changes the CTS by reducing the Completion Time to restore an inoperable vacuum breaker from 7 days to 72 hours. | 3.6.1.6 ACTIONS A and C | 3.7.A.3.b |
| 3.6.1.7<br>M.1 | CTS 3.7.A.4.a is applicable when Primary Containment Integrity is required. CTS 3.7.A.2.a.(1) specifies that Primary Containment Integrity is required at all times when the reactor is critical or when the reactor water temperature is above 212˚F and fuel is in the reactor vessel. ITS 3.6.1.7 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the suppression chamber-to-drywell vacuum breakers to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.1.7 Applicability | 3.7.A.4.a |
| 3.6.1.7<br>M.2 | ITS SR 3.6.1.7.1 requires verification that each vacuum breaker is closed every 14 days. Two Notes are included that specify the Surveillance is not required to be met: 1) the vacuum breakers are open during Surveillances; or 2) if the vacuum breakers are open when performing their intended function. This Surveillance Requirement is not included in the CTS. This changes the CTS by adding a Surveillance Requirement to verify each vacuum breaker is closed every 14 days. | SR 3.6.1.7.1 | None |
| 3.6.1.7 | CTS 3.7.A.4.b allows a suppression chamber-to-drywell vacuum breaker to be not fully closed by | 3.6.1.7 ACTION B | 3.7.A.4.b, |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| M.3 | indication provided drywell-to-suppression chamber differential pressure decay does not exceed values shown on Figure 3.7-1. CTS 3.7.A.4.c allows vacuum breakers to be inoperable provided a determination that the inoperable vacuum breaker is closed. Neither of these Actions provides a time to complete the determination. However, CTS 4.7.A.4.b states that when the position of any suppression chamber-to-drywell vacuum breaker is indicated to be not fully closed, "the drywell to suppression chamber differential pressure decay shall be demonstrated to be less than shown on Figure 3.7.1 immediately..." Thus, CTS 4.7.A.4.b is the requirement that ensures the provisions of CTS 3.7.A..4.b and c are met. Furthermore, CTS 4.7.A.4.b does not specify a completion time to perform the demonstration; only that it is begun "immediately." ITS 3.6.1.7 ACTION B imposes a requirement to close the open vacuum breaker in 12 hours. This changes the CTS by specifying a 12 hour Completion Time to close an open vacuum breaker and deletes the requirement to initiate to demonstration immediately. The change that moves the method of determining a vacuum breaker is closed (by performing a drywell-to-suppression chamber differential pressure decay test) is discussed in DOC LA.1. | | 3.7.A.4.c |
| 3.6.1.7<br>M.4 | CTS 3.7.A.4.a requires all eight suppression chamber-to-drywell vacuum breakers to be OPERABLE and closed. However, CTS 3.7.A.4.c specifies up to two suppression chamber-to-drywell vacuum breakers may be inoperable provided that: 1) the vacuum breakers are fully closed and at least one alarm circuit is OPERABLE; or 2) the vacuum breaker is secured in the closed position or replaced by a blank flange. ITS LCO 3.6.1.7 requires seven suppression chamber-to-drywell vacuum breakers to be OPERABLE for opening and eight suppression chamber-to-drywell vacuum breakers are closed. ITS 3.6.1.7 ACTION A states that when one of the seven required suppression chamber-to-drywell vacuum breakers is inoperable, it must be restored to OPERABLE status within 72 hours. This changes the CTS by increasing the number of vacuum breakers required to be OPERABLE for opening from six to seven, and providing a Completion Time of 72 hours to restore an inoperable vacuum breaker when one of the seven required vacuum breakers is inoperable. The change to the manner in which the vacuum breakers are determined to be closed is discussed in DOC L.1. | LCO 3.6.1.7,<br>3.6.1.7 ACTION A | 3.7.A.4.a,<br>3.7.A.4.c |
| 3.6.1.8<br>M.1 | CTS 3.5.C.1 is applicable when irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.6.1.8 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring two RHR drywell spray subsystems to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.1.8 Applicability | 3.5.C.1 |
| 3.6.1.8<br>M.2 | Currently, the CTS does not provide any specific Surveillance Requirement to verify the alignment of the RHR drywell spray subsystems. ITS SR 3.6.1.8.1 requires verification that each RHR drywell spray subsystem manual and power operated valve in the flow path that is not locked, | SR 3.6.1.8.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | sealed, or otherwise secured in position is in the correct position or can be aligned to the correct position every 31 days. This changes the CTS by adding this Surveillance Requirement to the Technical Specifications. | | |
| 3.6.2.1 M.1 | CTS 3.7.A.1 is applicable, in part, when irradiated fuel is in the reactor vessel and reactor water temperature is above 212˚F. ITS LCO 3.6.2.1 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the suppression pool water temperature to be within limits in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.2.1 Applicability | 3.7.A.1 |
| 3.6.2.1 M.2 | CTS 3.7.A.1.c requires the reactor to be scrammed immediately if suppression pool water temperature is > 110˚F. ITS 3.6.2.1 ACTION D requires a similar action, and also requires verifying the suppression pool temperature is ≤ 120˚F once per 30 minutes and to be in MODE 4 in 36 hours. This changes the CTS by requiring increased monitoring of the suppression pool average temperature and requiring the plant be placed in a MODE outside the applicability of the LCO when the suppression pool water temperature is > 110˚F. | 3.6.2.1 ACTION D | 3.7.A.1.c |
| 3.6.2.1 M.3 | CTS 3.7.A.1.d requires the reactor vessel to be depressurized to < 200 psig if the suppression pool temperature exceeds 120˚F. However, this action is only required "during reactor isolation conditions" (i.e., main steam isolation valves (MSIVs) closed). ITS 3.6.2.1 ACTION E requires a similar action (as modified by DOC M.4), but it is required at all times when in MODE 3, not just during reactor isolation conditions. This changes the CTS by requiring a reactor vessel depressurization to < 200 psig at all times when in MODE 3 and suppression pool temperature exceeds 120˚F. | 3.6.2.1 ACTION E | 3.7.A.1.d |
| 3.6.2.1 M.4 | CTS 3.7.A.1.d requires the reactor to be depressurized to < 200 psig "at normal cooldown rates" if suppression pool temperature exceeds 120˚F. ITS 3.6.2.1 ACTION E requires depressurizing the reactor to < 200 psig in 12 hours. This changes the CTS by specifying a Completion Time to depressurize the reactor vessel. | 3.6.2.1 ACTION E | 3.7.A.1.d |
| 3.6.2.1 M.5 | CTS 4.7.A.1.b requires the suppression pool temperature to be checked every 5 minutes whenever there is indication of "relief valve operation that adds heat to the suppression pool." ITS SR 3.6.2.1.1 requires similar suppression pool temperature verification every 5 minutes, but requires the verification to be performed anytime there is testing that adds heat to the suppression pool. This changes the CTS by requiring the every 5 minute suppression pool temperature verification anytime there is testing that adds heat to the suppression pool, not just when there is indication of "relief valve operation which adds heat to the suppression pool." | SR 3.6.2.1.1 | 4.7.A.1.b |
| 3.6.2.1 M.6 | CTS 3.7.A.1.f, in part, requires the unit to be placed in a cold shutdown condition within 24 hours if the requirements of 3.7.A.1.a (i.e., suppression pool temperature during normal operation shall be | 3.6.2.1 ACTION B | 3.7.A.1.f |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ≤ 90˚F) or 3.7.A.1.b (i.e., suppression pool temperature not reduced to ≤ 90˚F within 24 hours after suspension of testing that adds heat to the suppression pool) cannot be met. However, as described in DOC A.2, the condition of normal operation is when the reactor is critical and > 1% RTP. Thus, since CTS 3.7.A.1.a is only applicable when > 1% RTP, once reactor power is reduced to ≤ 1% RTP, the CTS 3.7.A.1.a requirement is no longer applicable, and continuation to cold shutdown is not required. ITS 3.6.2.1 ACTION B requires a reduction in THERMAL POWER to ≤ 1% RTP in 12 hours. This changes the CTS by reducing the time allowed to be ≤ 1% RTP from 24 hours to 12 hours. | | |
| 3.6.2.1<br>M.7 | After the completion of testing that adds heat to the suppression pool, CTS 3.7.A.1.b allows 24 hours to restore suppression pool temperature to ≤ 90˚F if testing that adds heat to the suppression pool is the cause for suppression pool temperature exceeding 90˚F. ITS 3.6.2.1 ACTION A provides a similar 24 hour restoration time, however, an additional requirement (ITS 3.6.2.1 Required Action A.1) to verify suppression pool temperature is ≤ 110˚F once per hour is also required. This changes the CTS by adding a requirement to verify suppression pool temperature is ≤ 110˚F once per hour after the completion of testing that adds heat to the suppression pool, if the testing resulted in suppression pool temperature exceeding 90˚F. | 3.6.2.1 Required Action A.1 | 3.7.A.1.b |
| 3.6.2.2<br>M.1 | CTS 3.7.A.1 is applicable, in part, when irradiated fuel is in the reactor vessel and reactor water temperature is above 212˚F. ITS LCO 3.6.2.2 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the suppression pool water level to be within limits in MODE 2, when reactor water temperature is less than or equal to 212˚F. | 3.6.2.2 Applicability | 3.7.A.1 |
| 3.6.2.3<br>M.1 | CTS 3.5.C.1 is applicable when irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.6.2.3 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring two RHR suppression pool cooling subsystems to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.6.2.3 Applicability | 3.5.C.1 |
| 3.6.2.3<br>M.2 | Currently, the CTS does not provide any specific Surveillances to verify OPERABILITY of the RHR suppression pool cooling subsystems. ITS SR 3.6.2.3.1 requires verification that each RHR suppression pool cooling subsystem manual and power operated valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position or can be aligned to the correct position every 31 days. ITS SR 3.6.2.3.2 requires verification that each required RHR pump develops a flow rate greater than 3780 gpm through the associated heat exchanger while operating in the suppression pool cooling mode, in accordance with the Inservice Testing Program. This changes the CTS by adding these Surveillance Requirements to the Technical Specifications. | SR 3.6.2.3.1,<br>SR 3.6.2.3.2 | None |
| 3.6.4.1<br>M.1 | CTS 3.7.C.2.a and 3.7.C.2.b state that the secondary containment requirements are not required when both the reactor is subcritical and Specification 3.3.A is met, and reactor water temperature | 3.6.4.1 Applicability | 3.7.C.2.a, 3.7.C.2.b |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | is below 212˚F, respectively. ITS 3.6.4.1 requires the secondary containment to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the secondary containment to be OPERABLE in MODE 2 when the reactor water temperature is less than or equal to 212˚F. | | |
| 3.6.4.1 M.2 | CTS 4.7.C does not contain an explicit verification that secondary containment vacuum is maintained. ITS SR 3.6.4.1.1 requires verification that secondary containment vacuum is $\geq$ 0.25 inch of vacuum water gauge. This changes the CTS by adding a Surveillance to verify secondary containment vacuum within limits. | SR 3.6.4.1.1 | None |
| 3.6.4.1 M.3 | CTS 4.7.C.1.a requires the secondary containment capability test to be performed with a standby gas treatment (SGT) filter train every 24 months. ITS SR 3.6.4.1.4 requires this same test, however it is required to be performed every 24 months "on a STAGGERED TEST BASIS for each SGT subsystem." This changes the CTS by requiring the test to be performed using each SGT subsystem at least once per 48 months. | SR 3.6.4.1.4 | 4.7.C.1.a |
| 3.6.4.1 M.4 | CTS 4.7.C.1.a requires the secondary containment capability test to be performed; however the test does not include a test duration. ITS SR 3.6.4.1.4 requires this same test, however it must now be performed for a "1 hour" period. This changes the CTS by requiring the secondary containment capability test to be performed for a 1 hour period. | SR 3.6.4.1.4 | 4.7.C.1.a |
| 3.6.4.1 M.5 | CTS 3.7.C.4.a states if CTS 3.7.C.1 through CTS 3.7.C.3 cannot be met during Run, Startup, or Hot Shutdown, to initiate a normal orderly shutdown and have the reactor in Cold Shutdown condition within 36 hours. ITS 3.6.4.1 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours under the same conditions. This changes the CTS by requiring the unit be in an intermediate condition (MODE 3) within 12 hours. | 3.6.4.1 ACTION B | 3.7.C.4.a |
| 3.6.4.1 M.6 | CTS 1.0.W.1 states that the Secondary Containment Integrity includes the condition that at least one door in each access opening is closed. However, CTS 4.7.C does not contain an explicit verification of the status of the access openings. ITS SR 3.6.4.1.3 requires the verification, every 31 days, that at least one door in each access opening is closed. This changes the CTS by adding a periodic Surveillance Requirement to the CTS to confirm the condition of the access openings. | SR 3.6.4.1.3 | None |
| 3.6.4.1 M.7 | CTS 1.0.W states, in part, that Secondary Containment Integrity means that the reactor building is closed. However, CTS 4.7.C does not contain an explicit verification of the status of the secondary containment equipment hatches. ITS SR 3.6.4.1.2 requires verification, every 31 days, that all secondary containment equipment hatches are closed and sealed. This changes the CTS by adding the requirement that each secondary containment equipment hatch is "sealed" and it also adds a new Surveillance Requirement. | SR 3.6.4.1.2 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.6.4.2 M.1 | CTS 3.7.C.2.a and 3.7.C.2.b state that the secondary containment (i.e., SCIVs) requirements are not required when both the reactor is subcritical and Specification 3.3.A is met, and reactor water temperature is below 212˚F, respectively. ITS 3.6.4.2 requires the SCIVs to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the SCIVs to be OPERABLE in MODE 2 when the reactor water temperature is less than or equal to 212˚F. | 3.6.4.2 Applicability | 3.7.C.2.a, 3.7.C.2.b |
| 3.6.4.2 M.2 | CTS 3.7.C.3 states that with an inoperable secondary containment isolation damper to isolate the affected duct by use of a closed damper or blind flange within eight hours. ITS 3.6.4.2 ACTION A includes a similar requirement, however it also includes an additional Required Action (ITS 3.6.4.2 Required Action A.2) to verify the affected penetration flow path is isolated once per 31 days. The Required Action also includes two Notes, one that states that isolation devices in high radiation areas may be verified by use of administrative means and a second that states that isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. This changes the CTS by adding this additional Required Action and associated Notes. | 3.6.4.2 Required Action A.2 | 3.7.C.3 |
| 3.6.4.2 M.3 | CTS 1.0.W states, in part, that Secondary Containment Integrity means that the reactor building is closed, however CTS 4.7.C does not contain an explicit periodic verification of the status of the secondary containment isolation manual valves and blind flanges. ITS SR 3.6.4.2.1 requires a 31 day verification that each secondary containment isolation manual valve and blind flange that is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed. In addition, this Surveillance is modified by two Notes that allow valves and blind flanges in high radiation areas to be verified by administrative means and allows SCIVs to be open under administrative controls. This changes the CTS by adding the Surveillance Requirement for verification of the status of the secondary containment isolation manual valves and blind flanges. | SR 3.6.4.2.1 | None |
| 3.6.4.2 M.4 | CTS 4.7.C does not include any requirements to verify the isolation times of each power operated, automatic SCIV. ITS SR 3.6.4.2.2 requires this verification every 92 days. This changes the CTS by adding the additional Surveillance to verify the isolation time of automatic SCIVs is within limits. | SR 3.6.4.2.2 | None |
| 3.6.4.2 M.5 | CTS 3.7.C.4.a states if CTS 3.7.C.1 through CTS 3.7.C.3 cannot be met during Run. Startup, or Hot Shutdown, to initiate a normal orderly shutdown and have the reactor in Cold Shutdown condition within 36 hours. ITS 3.6.4.2 ACTION C requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours under the same conditions. This changes the CTS by requiring the unit be in an intermediate condition (MODE 3) within 12 hours. | 3.6.4.2 ACTION C | 3.7.C.4.a |
| 3.6.4.3 M.1 | CTS 3.7.B.1.a states, in part, that if the inoperable SGT subsystem is not restored to OPERABLE status within 7 days, then 36 hours is allowed to be in a Cold Shutdown condition. ITS 3.6.4.3 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours under the same conditions. This changes the CTS by requiring the unit be in an intermediate condition (MODE 3) within 12 hours. | 3.6.4.3 ACTION B | 3.7.B.1.a |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.7.1 M.1 | CTS 3.5.C.1 is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.7.1 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring two RHRSW subsystems to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.7.1 Applicability | 3.5.C.1 |
| 3.7.1 M.2 | Currently, the CTS does not provide any specific Surveillances to verify OPERABILITY of the RHRSW subsystems. ITS SR 3.7.1.1 requires verification that each RHRSW subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position or can be aligned to the correct position every 31 days. This changes the CTS by adding this SR to the TSs. | SR 3.7.1.1 | None |
| 3.7.2 M.1 | The CTS does not have any specific requirements for the Emergency Service Water (ESW) System or ultimate heat sink (UHS). The ESW System and UHS requirements are governed by the systems they support. ITS LCO 3.7.2 requires two ESW subsystems and the UHS to be OPERABLE. Appropriate ACTIONS and Surveillance Requirements are also provided. This changes the CTS by incorporating the requirements of ITS 3.7.2. | 3.7.2 | None |
| 3.7.3 M.1 | The CTS does not have any specific requirements for the Emergency Diesel Generator-Emergency Service Water (EDG-ESW) System. The EDG-ESW System requirements are governed by the EDG Technical Specifications. ITS LCO 3.7.3 requires two EDG-ESW subsystems to be OPERABLE. An appropriate ACTION and Surveillance Requirements are also provided. This changes the CTS by incorporating the requirements of ITS 3.7.3. | 3.7.3 | None |
| 3.7.4 M.1 | CTS 3.17.B.1, is applicable, in part, whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.7.4 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the CREF System to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.7.4 Applicability | 3.17.B.1 |
| 3.7.4 M.2 | CTS 3.17.B.1.a allows 7 days to restore an inoperable CREF subsystem. If this cannot be met, it requires the unit to be in hot shutdown (i.e., MODE 3) in 12 hours and to be below 212˚F (i.e., be in MODE 4) or initiate and maintain the OPERABLE CREF subsystem in the pressurization mode within the following 24 hours. ITS 3.7.4 ACTION C does not include the option to place the OPERABLE CREF subsystem in operation in lieu of being in MODE 4. This changes the CTS by deleting the allowance to place the OPERABLE CREF subsystem in operation in lieu of achieving MODE 4 conditions. | 3.7.4 ACTION C | 3.17.B.1.a |
| 3.7.4 M.3 | When both CREF subsystems are inoperable, CTS 3.17.B.1.b allows 24 hours to restore an inoperable CREF subsystem to OPERABLE status prior to initiating a reactor shutdown. When both CREF subsystems are inoperable due to an inoperable control room boundary, ITS 3.7.4 | 3.7.4 ACTIONS B and E | 3.17.B.1.b |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | ACTION B allows 24 hours to restore the control room boundary to OPERABLE status. When both CREF subsystems are inoperable for reasons other than an inoperable control room boundary, ITS 3.7.4 ACTION E requires immediate entry into LCO 3.0.3. This will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring an immediate entry into LCO 3.0.3 when two CREF subsystems are inoperable for any reason other than the control room boundary being inoperable. | | |
| 3.7.5 M.1 | CTS 3.17.A.1 is applicable, in part, whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212˚F. ITS LCO 3.7.5 is applicable in MODES 1, 2, and 3. This changes the CTS by requiring the Control Room Ventilation System to be OPERABLE in MODE 2 when reactor water temperature is less than or equal to 212˚F. | 3.7.5 Applicability | 3.17.A.1 |
| 3.7.5 M.2 | CTS 4.17.A does not provide a requirement to verify the capability of the Control Room Ventilation System to remove the assumed heat load. ITS 3.7.5 includes a Surveillance Requirement to cover this requirement. ITS SR 3.7.5.1 requires verification that each control room ventilation subsystem has the capability to remove the assumed heat load every 24 months. This changes the CTS by adding an additional OPERABILITY requirement for the Control Room Ventilation System. | SR 3.7.5.1 | None |
| 3.7.5 M.3 | When both control room ventilation subsystems are inoperable, CTS 3.17.A.3.a allows 24 hours to restore an inoperable control room ventilation subsystem to OPERABLE status. If CTS 3.17.A.3.a is not met, CTS 3.17.A.3.b requires the unit to be in MODE 3 in 12 hours and in MODE 4 within the following 24 hours. ITS 3.7.5 ACTION D requires immediate entry into LCO 3.0.3 under the same conditions. This will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring an immediate entry into LCO 3.0.3 when two control room ventilation subsystems are inoperable. | 3.7.5 ACTION D | 3.17.A.3.a, 3.17.A.3.b |
| 3.7.7 M.1 | The CTS does not have any requirements for Main Turbine Bypass System. ITS LCO 3.7.7 requires the Main Turbine Bypass System to be OPERABLE. This changes the CTS by incorporating the requirements of ITS 3.7.7. Appropriate ACTIONS and Surveillance Requirements are also provided. | 3.7.7 | None |
| 3.8.1 M.1 | CTS 3.9.A requires the AC sources to be OPERABLE when the reactor is critical. ITS LCO 3.8.1 requires the AC sources to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the AC sources to be OPERABLE in MODE 3 and in MODE 2 when the reactor is not critical. | 3.8.1 Applicability | 3.9.A |
| 3.8.1 M.2 | ITS SR 3.8.1.1 requires verification that each required offsite source is correctly aligned and indicated power is available every 7 days. ITS SR 3.8.1.4 requires that each day tank and base tank be checked for accumulated water and to remove it every 31 days. ITS SR 3.8.1.6 requires | SR 3.8.1.1, SR 3.8.1.4, SR 3.8.1.6, | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | verification of automatic and manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit every 24 months on a STAGGERED TEST BASIS for each Division. ITS SR 3.8.1.7 requires that the frequency of each EDG does not go above the specified limit during the rejection of the largest post-accident load every 24 months. ITS SR 3.8.1.8 requires the performance of an ECCS initiation signal test every 24 months. ITS SR 3.8.1.9 requires each EDG to be loaded at the specified loads for 8 hours every 24 months. ITS SR 3.8.1.10 requires an EDG hot restart test every 24 months. ITS SR 3.8.1.11 requires verification that each EDG can synchronize with an offsite power source while loaded with emergency loads upon a simulated restoration of offsite power, and return to the ready-to-load operation every 24 months. This changes the CTS by adding these Surveillance Requirements to the Technical Specifications. | SR 3.8.1.7,<br>SR 3.8.1.8,<br>SR 3.8.1.9,<br>SR 3.8.1.10,<br>SR 3.8.1.11 | |
| 3.8.1<br>M.3 | CTS 3.9.B states that under certain conditions (i.e., requirements of CTS 3.9.A and CTS 3.9.B not met), the reactor shall be placed in the cold shutdown condition within 24 hours. Thus, when the restoration times of CTS 3.9.B.2 or CTS 3.9.B.3.a are not met, or for any other combination of AC source inoperabilities other than both EDGs inoperable (i.e., two offsite circuits), the CTS 3.9.B requirement would apply. However, the AC sources are only required to be OPERABLE when critical, as stated in CTS 3.9.A. Thus, the plant is only required to be subcritical in 24 hours. In addition, CTS 3.9.B.3.a.2) states that if both EDGs are inoperable, the reactor shall be placed in the cold shutdown condition. No time is specified to reach the cold shutdown condition. However, as stated above, since the AC Sources are only required to be OPERABLE when critical, the plant is only required to be subcritical. ITS 3.8.1 ACTION F provides the shutdown requirements when any Required Action and associated Completion Time of Condition A, B, C, D, or E is not met, and requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. ITS 3.8.1 ACTION G provides the shutdown requirements when three or more required AC sources are inoperable, and requires the unit to enter LCO 3.0.3. ITS LCO 3.0.3 will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring the plant to be in MODE 3 in 12 hours and in cold shutdown (MODE 4) in 36 hours, in lieu of being subcritical for CTS 3.9.B.3.a.2) and in lieu of being subcritical in 24 hours for CTS 3.9.B, if any Required Action and associated Completion Time of Condition A, B, C, D, or E is not met. In addition, this changes the CTS by requiring the plant to initiate a plant shutdown within 1 hour, to be in MODE 2 in 7 hours, to be in MODE 3 in 13 hours, and to be in MODE 4 in 37 hours, in lieu of being subcritical in 24 hours, if three or more required AC sources are inoperable. | 3.8.1 ACTIONS F and G | 3.9.B,<br>3.9.B.3.a.2) |
| 3.8.1<br>M.4 | CTS 3.9.B.2 allows one offsite circuit to be inoperable for 7 days provided one offsite circuit is OPERABLE, but does not provide any specific requirement to determine how the other offsite circuit is OPERABLE nor how often to perform the determination. CTS 3.9.B.3.a covers the condition for one inoperable EDG but does not provide any requirement to determine whether the | 3.8.1 Required Actions A.1 and B.1 | 3.9.B.2,<br>3.9.B.3.a |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | offsite circuits are OPERABLE. ITS 3.8.1 Required Action A.1 requires the performance of SR 3.8.1.1 (the offsite circuit verification) for the OPERABLE required offsite circuit within 1 hour and once per 8 hours thereafter when a required offsite circuit is inoperable. ITS 3.8.1 Required Action B.1 also requires the performance of SR 3.8.1.1 for the OPERABLE required offsite circuit(s) within 1 hour and once per 8 hours thereafter when an EDG is inoperable. This changes the CTS by adding a specific method and time to perform the offsite circuit verification when an offsite circuit is inoperable and a verification of offsite circuit OPERABILITY when an EDG is inoperable. | | |
| 3.8.1 M.5 | [3.8.1 M.5 withdrawn during LAR review due to TSTF-439 Rev. 2 incorporation.] | N/A | N/A |
| 3.8.1 M.6 | CTS 4.9.B.3.a.1), in part, requires a manual start of the EDGs while CTS 4.9.B.3.a.2) requires verification of EDG performance when simulating a loss of offsite power in conjunction with an ECCS actuation test signal. These Surveillance Requirements do not specify the steady state voltage and frequency that must be achieved by the EDG. ITS SR 3.8.1.2 and ITS SR 3.8.1.12 require, in part, that each EDG achieve a steady state voltage of $\geq$ 3975V and $\leq$ 4400V and a frequency of $\geq$ 58.8Hz and $\leq$ 61.2Hz. This changes the CTS by providing explicit steady state voltage and frequency limits. | SR 3.8.1.2, SR 3.8.1.12 | 4.9.B.3.a.1), 4.9.B.3.a.2) |
| 3.8.1 M.7 | CTS 4.9.B.3.a.1) requires each EDG to be loaded and operated for $\geq$ 60 minutes. ITS SR 3.8.1.3 requires a similar test, however a Note has been added that places restrictions on the test. ITS SR 3.8.1.3 Note 3 states that the SR shall be conducted on only one EDG at a time. This changes the CTS by adding a restriction when performing this test. | SR 3.8.1.3 Note 3 | None |
| 3.8.1 M.8 | CTS 4.9.B.3.b.2) requires verification that the diesel fuel oil transfer pump and diesel oil service pump are operated. This test verifies the fuel oil transfer system capability to transfer fuel oil from the storage tank to the day tank. The CTS does not specify any requirements to verify the transfer capability of the fuel oil transfer system to transfer fuel oil from each EDG day tank to the associated base tank. ITS SR 3.8.1.5 requires verification that the fuel oil transfer system operates to transfer fuel oil from the storage tank to the day tanks and from each day tank to the associated base tank. This changes the CTS by adding an explicit Surveillance to verify the fuel oil transfer system capability between each EDG day tank to the associated base tank. | SR 3.8.1.5 | None |
| 3.8.1 M.9 | CTS 3.9.B.1 allows the plant to operate 7 days with one inoperable EDG while CTS 3.9.B.2 allows the unit to operate 72 hours with one required offsite source inoperable. ITS 3.8.1 ACTION D covers the condition of one required offsite circuit and one EDG inoperable and requires the restoration of either the required offsite circuit or the EDG to OPERABLE status within 12 hours. In addition, a Note is included that requires entry into the Conditions and Required | 3.8.1 ACTION D, including Note | 3.9.B.1, 3.9.B.2 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition D is entered with no AC power source to any division. This changes the CTS by reducing the time the plant can operate with one required offsite source and one EDG inoperable. | | |
| 3.8.2<br>M.1 | CTS 3.9 does not contain any explicit Action requirements for qualified circuits and emergency diesel generators (EDGs) when these AC Sources are inoperable but are required to be OPERABLE. However, the CTS 1.0.L definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources... that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)." Furthermore, the definition states that if the normal or emergency power source is inoperable, the system, subsystem, train, component or device may be considered OPERABLE provided the corresponding normal or emergency power source is OPERABLE and all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE. ITS 3.8.2 ACTIONS A and B have been added to cover the situation when the qualified offsite circuit or EDG is inoperable, respectively. If the required offsite circuit is inoperable, ITS 3.8.2 ACTION A requires either the declaration that affected required feature(s), with no offsite power available, inoperable, or to suspend certain activities (CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and operations with a potential for draining the reactor vessel (OPDRVs)) and to initiate action to restore required offsite power circuit to OPERABLE status. If the required EDG is inoperable, ITS 3.8.2 ACTION B requires the immediate suspension of certain activities (CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs) and to initiate action to restore required EDG to OPERABLE status. In addition, a Note that states LCO 3.0.3 in not applicable has been added. This change adds compensatory actions for the inoperable required AC Source. | 3.8.2 ACTIONS A and B, including ACTIONS Note | 1.0.W |
| 3.8.2<br>M.2 | CTS 4.9 does not contain any specific Surveillance Requirements for qualified circuits and EDGs when these AC Sources are required to support equipment required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. ITS SR 3.8.2.1 requires the SRs of Specification 3.8.1, except SR 3.8.1.6 to be applicable. The Surveillance includes a Note allowing certain Surveillances to not be performed to preclude requiring the OPERABLE EDG from being paralleled with the offsite power network or otherwise rendered inoperable during the performance of the SR, or to preclude de-energizing a required 4.16 kV essential bus or disconnecting a required offsite circuit during performance of the SR. In addition, Surveillances associated with an ECCS automatic initiation signal are not required when ECCS is not required to be OPERABLE. This changes the CTS by adding explicit Surveillances for the AC Sources required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. | SR 3.8.2.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 3.8.3<br>M.1 | While CTS 4.9.B.3.b.3) specifies a requirement to sample the diesel fuel and check for quality once a month, the CTS does not provide any specific testing requirements to check for and remove accumulated water from the fuel oil storage tank. ITS SR 3.8.3.5 requires this verification every 31 days. This changes the CTS by requiring a new Surveillance Requirement to check for and remove accumulated water from the fuel oil storage tank. | SR 3.8.3.5 | None |
| 3.8.3<br>M.2 | CTS 4.9.B.3.b.3) specifies a requirement to sample the stored diesel fuel oil and check for quality once a month. The CTS does not provide any specific guidance for when the plant specific quality requirements are not met. Furthermore, the CTS does not contain any requirements concerning the acceptance criteria limits for new fuel oil, which is sampled prior to its addition to the fuel oil storage tank, but the results of the sample are not known until after the new fuel oil is added to the fuel oil storage tank. ITS 3.8.3 ACTION C specifies the compensatory actions for stored fuel oil total particulates not within limits, and requires the restoration of the fuel oil total particulates to within limits in 7 days. ITS 3.8.3 ACTION D specifies the compensatory actions for new fuel oil properties not within limits, and requires the restoration of the stored fuel oil properties to within limits within 30 days. If these new ACTIONS are not met, ITS 3.8.3 ACTION G requires both EDGs to be declared inoperable (and the ACTIONS of ITS 3.8.1 taken). In addition, ITS SR 3.8.3.3 requires a verification that the fuel oil properties of new fuel oil are tested in accordance with, and maintained within the limits of the Diesel Fuel Oil Storage Program. This changes the CTS by providing an explicit ACTION for when the fuel oil total particulates limit is not met, a new Surveillance Requirement to verify new fuel oil limits are met, and an ACTION if they are not met. | 3.8.3 ACTIONS C, D and G,<br>SR 3.8.3.3 | 4.9.B.3.b.3) |
| 3.8.3<br>M.3 | The CTS does not provide any EDG lube oil requirements. ITS LCO 3.8.3, in part, requires the lube oil inventory to be within limits for each required EDG. The Applicability for this requirement is when the associated EDG is required to be OPERABLE. ITS SR 3.8.3.2 requires a verification that the lube oil inventory is $\geq$ 165 gallons for each EDG. ITS 3.8.3 ACTION B provides an ACTION if the limit of ITS SR 3.8.3.2 is not met. This changes the CTS by adding a lube oil inventory requirement, and an appropriate ACTIONS and Surveillance Requirement. | LCO 3.8.3,<br>3.8.3 ACTION B,<br>SR 3.8.3.2 | None |
| 3.8.4<br>M.1 | CTS 3.9.A requires the station batteries specified in CTS 3.9.A.4 to be OPERABLE when the reactor is critical. ITS LCO 3.8.4 requires the station batteries to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the batteries to be OPERABLE in MODE 3 and in MODE 2 when the reactor is not critical. | 3.8.4 Applicability | 3.9.A |
| 3.8.4<br>M.2 | CTS 3.9.B.4 states that when one of the two 125 VDC battery systems or one of the two 250 V battery systems is made or found to be inoperable for any reason, an orderly shutdown of the reactor shall be initiated and the reactor water temperature shall be reduced to less than 212˚F within 24 hours unless such battery system are sooner made OPERABLE. CTS 3.9.B states that when the reactor mode switch is in Run, the availability of electric power shall be as specified in | 3.8.4 ACTION C | 3.9.B,<br>3.9.B.4 |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | CTS 3.9.A, except as specified in CTS 3.9.B or the reactor shall be placed in the cold shutdown condition within 24 hours. Thus, when more than one 125V or 250V battery systems are inoperable, the CTS 3.9.B requirement would apply. However, the CTS 3.9.A.4 125V and 250V battery systems are only required to be OPERABLE when critical, as stated in CTS 3.9.A. Thus, the plant is only required to be subcritical in 24 hours. ITS 3.8.4 ACTION C provides the shutdown requirement when one 125V or 250V battery system is inoperable and requires the unit to be in MODE 3 within 12 hours and MODE 4 within 36 hours. If there are inoperable DC Sources in both Division 1 and Division 2, entry into ITS LCO 3.0.3 is required since a Condition does not exist for this condition in ITS 3.8.4. ITS LCO 3.0.3 will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring the plant to be in MODE 3 in 12 hours and in cold shutdown (MODE 4) in 36 hours, in lieu of being subcritical in 24 hours, if one 125V or 250V battery system is inoperable. In addition, this changes the CTS by requiring the plant to initiate a plant shutdown within 1 hour, to be in MODE 2 in 7 hours, to be in MODE 3 in 13 hours, and to be in MODE 4 in 37 hours, in lieu of being subcritical in 24 hours, if more than one 125V or 250V battery system is inoperable. | | |
| 3.8.4<br>M.3 | CTS 4.9.B.4 does not provide any specific testing requirements for the Division 1 and 2 250 VDC and 125 VDC battery chargers. ITS SR 3.8.4.2 requires verification, every 24 months, each required battery charger can supply $\geq$ 150 amps for the station 250 VDC subsystem and $\geq$ 50 amps for station 125 VDC subsystems at greater than or equal to the minimum established float voltage for $\geq$ 4 hours or to verify each required battery charger can recharge the battery to the fully charged state within 24 hours for 250 VDC subsystems and 8 hours for 125 VDC subsystems while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis discharge state. This changes the CTS by requiring a new Surveillance Requirement for verifying the OPERABILITY of the required battery chargers associated with the Division 1 and Division 2 125 VDC and 250 VDC electrical power subsystems. | SR 3.8.4.2 | None |
| 3.8.4<br>M.4 | CTS 4.9.B.4 does not provide any specific testing requirements to perform a battery service test for the Division 1 and Division 2 125 VDC and 250 VDC batteries. ITS SR 3.8.4.3 requires the verification that battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test every 24 months. ITS SR 3.8.4.3 includes an allowance (Note 1) to perform a modified performance discharge test (ITS SR 3.8.6.6) in lieu of the battery service test. In addition, Note 2 includes a restriction that the Surveillance shall not normally be performed in MODE 1, 2, or 3, but allows credit to be taken for unplanned events that satisfy the SR. This changes the CTS by requiring a | SR 3.8.4.3, including Notes 1 and 2 | None |

## Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | new Surveillance Requirement for verifying the OPERABILITY of the Division 1 and Division 2 125 VDC and 250 VDC batteries. | | |
| 3.8.5<br>M.1 | The CTS does not have any requirements for the DC Sources in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. ITS LCO 3.8.5 requires Division 1 or Division 2 125 VDC electrical power subsystem to be OPERABLE. An appropriate ACTION and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.8.5. | 3.8.5 | None |
| 3.8.6<br>M.1 | ITS SR 3.8.6.1 requires the verification every 7 days that each battery float current is $\leq$ 2 amps for the 250 VDC batteries and $\leq$ 1 amp for the 125 VDC batteries. However, as Noted, this requirement is not required to be met when battery terminal voltage is less than the limit of SR 3.8.4.1. ITS SR 3.8.6.3 requires the verification every 31 days that each battery connected cell electrolyte level is greater than or equal to the minimum established design limits. CTS 4.9.B.4, which specifies the Surveillances for the Division 1 and Division 2 125 VDC and 250 VDC batteries, does not require these Surveillances. This changes the CTS by adding explicit Surveillances for battery float current and battery connected cell electrolyte level. | SR 3.8.6.1 (including Note), SR 3.8.6.3 | None |
| 3.8.6<br>M.2 | CTS 4.9.B.4.a requires the pilot cell voltage to be measured every week and CTS 4.9.B.4.b requires each cell voltage to be measured every 3 months. However, no voltage limit is provided in the CTS. ITS SR 3.8.6.2 requires monthly verification that each battery pilot cell voltage is $\geq$ 2.07 V and ITS SR 3.8.6.5 requires quarterly verification that each battery connected cell voltage is $\geq$ 2.07 V. This changes the CTS by specifying an acceptance criteria for pilot cell and battery connected cell voltage limits. The change in the Frequency for CTS 4.9.B.4.a is discussed in DOC L.2. | SR 3.8.6.2,<br>SR 3.8.6.5 | 4.9.B.4.a,<br>4.9.B.4.b |
| 3.8.6<br>M.3 | CTS 4.9.B.4.c requires the "rated load discharge test" (i.e., a "performance discharge test" in the ITS) to be performed, but it does not provide a capacity limit. ITS SR 3.8.6.6 requires the same test, but provides a limit of $\geq$ 90% of the manufacturer's rating. This changes the CTS by specifying the battery capacity limit. | SR 3.8.6.6 | 4.9.B.4.c |
| 3.8.7<br>M.1 | CTS 3.9.A requires the Division 1 and Division 2 AC and DC electrical power distribution subsystems to be OPERABLE when the reactor is critical. ITS LCO 3.8.7 requires the Division 1 and Division 2 AC and DC electrical power distribution subsystems to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by requiring the Division 1 and Division 2 AC and DC electrical power distribution subsystems to be OPERABLE in MODE 3 and in MODE 2 when the reactor is not critical. | 3.8.7 Applicability | 3.9.A |
| 3.8.7<br>M.2 | CTS 4.9.A and CTS 4.9.B do not provide any specific testing requirements for the Division 1 and Division 2 AC and DC electrical power distribution subsystems. ITS SR 3.8.7.1 requires verification of correct breaker alignments and voltage to required AC and DC electrical power distribution subsystems. This changes the CTS by requiring a new Surveillance Requirement for | SR 3.8.7.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | verifying the OPERABILITY of the required Division 1 and Division 2 AC and DC electrical power distribution subsystems. | | |
| 3.8.7<br>M.3 | CTS 3.9.B.4 states that when one of the two 125V battery systems or one of the two 250V battery systems is made or found to be inoperable for any reason an orderly shutdown of the reactor shall be initiated and the reactor water temperature shall be reduced to less than 212˚F within 24 hours unless such battery system is sooner made OPERABLE. This Action applies when a 125V or 250V electrical power distribution subsystem is inoperable. CTS 3.9.B states that when the reactor mode switch is in Run, the availability of electric power shall be as specified in CTS 3.9.A, except as specified in CTS 3.9.B or the reactor shall be placed in the cold shutdown condition within 24 hours. Thus, when more than one 125V or 250V battery systems are inoperable, the CTS 3.9.B requirement would apply. This Action (CTS 3.9.B) also applies when one or more AC electrical power distribution buses required by CTS 3.9.A.3 are inoperable. However, the CTS 3.9.A.3 AC electrical power distribution subsystems and the CTS 3.9.A.4 125 VDC and 250 VDC electrical power distribution subsystems are only required to be OPERABLE when critical, as stated in CTS 3.9.A. Thus, the plant is only required to be subcritical in 24 hours. ITS 3.8.7 ACTION C provides the shutdown requirements when one or more AC electrical power distribution subsystems or one or more 125 VDC or 250 VDC electrical power distribution subsystems are inoperable and a loss of function has not occurred, and requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours if any Required Action and associated Completion Time of Condition A or B are not met. ITS 3.8.7 ACTION D provides the shutdown requirements when two or more electrical power distribution subsystems are inoperable that result in a loss of function, and requires the unit to enter LCO 3.0.3. ITS LCO 3.0.3 will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring the plant to be in MODE 3 in 12 hours and in cold shutdown (MODE 4) in 36 hours, in lieu of being subcritical in 24 hours, if one or more AC electrical power distribution subsystems or one or more 125 VDC or 250 VDC electrical power distribution subsystems are inoperable and a loss of function has not occurred and any Required Action and associated Completion Time of Condition A or B are not met. In addition, this changes the CTS by requiring the plant to initiate a plant shutdown within 1 hour, to be in MODE 2 in 7 hours, to be in MODE 3 in 13 hours, and to be in MODE 4 in 37 hours, in lieu of being subcritical in 24 hours, if more than one AC or 125 VDC or 250 VDC electrical power distribution subsystems are inoperable and a loss of function has occurred. | 3.8.7 ACTIONS C and D | 3.9.B,<br>3.9.B.4 |
| 3.8.8<br>M.1 | CTS 4.9 does not have any specific Surveillance Requirements for the Distribution Systems when they are required to be OPERABLE to support equipment required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. ITS SR 3.8.8.1 requires verification of correct breaker alignment and voltage to required AC and DC | SR 3.8.8.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | electrical power distribution subsystems every 7 days. This changes the CTS by adding the explicit Surveillance for the portions of the electrical power distribution subsystems required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment. | | |
| 3.9.1 M.1 | CTS 4.10.A requires the refueling interlocks (in this case the refueling equipment interlocks) to be functional tested "prior to any fuel handling, with the head off the reactor vessel" and at "weekly intervals thereafter." However, it does not state how soon "prior to" starting the above evolutions. ITS SR 3.9.1.1 requires a similar verification every 7 days. This changes the CTS by eliminating the specific requirement to functionally test the refueling equipment interlocks "prior to any fuel handling, with the head off the reactor vessel," and replaces it with a requirement to perform the test 7 days prior to any fuel handling. | SR 3.9.1.1 | 4.10.A |
| 3.9.2 M.1 | CTS 3.10.A does not provide specific Actions for when the refueling equipment interlocks are inoperable. However, since the interlock must be OPERABLE during CORE ALTERATIONS, this implies that CORE ALTERATIONS must be suspended if the interlock is inoperable. ITS 3.9.2 ACTION A covers the condition when the refuel position one-rod-out interlock is inoperable and it requires the immediate suspension of control rod withdrawal and the immediate initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. This changes the CTS by adding specific Actions for when the refuel position one-rod-out interlock is not met. | 3.9.2 ACTION A | 3.10.A |
| 3.9.2 M.2 | CTS 4.10.A requires the refueling interlocks (in this case the refuel position one-rod-out interlock) to be functional tested "prior to any fuel handling, with the head off the reactor vessel" and at "weekly intervals thereafter." However, it does not state how soon "prior to" starting the above evolutions. ITS SR 3.9.2.2 requires a similar verification every 7 days. This changes the CTS by eliminating the specific requirement to functionally test the refuel position one-rod-out interlock "prior to any fuel handling, with the head off the reactor vessel," and replaces it with a requirement to perform the test 7 days prior to any fuel handling. | SR 3.9.2.2 | 4.10.A |
| 3.9.2 M.3 | CTS 3.10.A requires the reactor mode switch to be locked in the refuel position, however there is no Surveillance Requirement to verify that it is locked in the refuel position. ITS SR 3.9.2.1 requires verification every 12 hours that the reactor mode switch is locked in the refuel position. This changes the CTS by adding this new Surveillance. | SR 3.9.2.1 | None |
| 3.9.3 M.1 | The CTS does not specify any requirements for control rod position when loading fuel assemblies into the core. ITS LCO 3.9.3, "Control Rod Position," requires all control rods to be fully inserted. An appropriate ACTION and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.3. | 3.9.3 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | | | |
| 3.9.4<br>M.1 | The CTS does not specify any requirements for control rod position indication. ITS LCO 3.9.4, "Control Rod Position Indication," requires the "full-in" position indication channel for each control rod to be OPERABLE. An appropriate ACTION and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.4. | 3.9.4 | None |
| 3.9.5<br>M.1 | CTS 3.3.D requires each control rod accumulator to be operable. ITS LCO 3.9.5 requires each accumulator for a withdrawn control rod to be OPERABLE and has added the requirement that each withdrawn control rod must be capable of insertion upon receipt of a scram signal. ITS 3.9.5 ACTION A has been added to provide proper actions when the insertion capability is not met. ITS SR 3.9.5.1 has been added to insert each withdrawn control rod at least one notch every 7 days. This changes the CTS by adding an OPERABILITY requirement for control rod insertion capability and a subsequent Surveillance Requirement to demonstrate this insertion capability. | LCO 3.9.5,<br>3.9.5 ACTION A,<br>SR 3.9.5.1 | 3.3.D |
| 3.9.5<br>M.2 | CTS 4.3.D requires a check of the accumulator pressure alarm located in the control room. ITS SR 3.9.5.2 requires verification that each control rod scram accumulator pressure is $\geq$ 940 psig. This changes the CTS by providing an explicit value for control rod accumulator pressure, in lieu of specifying the alarm in the control room must be checked. | SR 3.9.5.2 | 4.3.D |
| 3.9.5<br>M.3 | CTS 3.3.D.2 allows a control rod accumulator to be inoperable if the one-rod-out interlock for the associated control rod is operable. ITS 3.9.5 does not provide this allowance. This changes the CTS by deleting a control rod accumulator inoperability allowance. | None | 3.3.D.2 |
| 3.9.6<br>M.1 | The CTS does not have any requirements for the reactor pressure vessel (RPV) water level to ensure the consequences of design basis refuel accident is maintained within analysis calculations. ITS LCO 3.9.6 requires the RPV water level to be $\geq$ 21 ft 11 inches above the top of the RPV flange during the movement of irradiated fuel assemblies within the RPV and during movement of new fuel assemblies or handling of control rods within the RPV when irradiated fuel assemblies are seated within the RPV. An appropriate ACTION and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.6. | 3.9.6 | None |
| 3.9.7<br>M.1 | The CTS does not have any requirements for the Residual Heat Removal (RHR) Shutdown Cooling System during MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level $\geq$ 21 ft 11 inches above the top of the RPV flange. ITS LCO 3.9.7 requires one RHR shutdown cooling subsystem to be OPERABLE and in operation. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.7. | 3.9.7 | None |
| 3.9.8<br>M.1 | The CTS does not have any requirements for the Residual Heat Removal (RHR) Shutdown Cooling System during MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level < 21 ft 11 inches above the top of the RPV flange. ITS LCO 3.9.8 requires two RHR | 3.9.8 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | shutdown cooling subsystems to be OPERABLE, and one RHR shutdown cooling subsystem in operation. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.8. | | |
| 3.10.2<br>M.1 | CTS 3.10.E applies during extended core and control rod drive maintenance. CTS 3.10.E requires the mode switch to be locked in the refuel position, "except for momentary switching to the Startup mode for interlock testing." ITS LCO 3.10.2 also allows the reactor mode switch to be placed in the startup/hot standby position for reactor mode switch interlock testing during MODE 5, however it only allows this testing if all control rods remain fully inserted in core cells containing one or more fuel assemblies (ITS LCO 3.10.2.a) and no CORE ALTERATIONS are in progress (ITS LCO 3.10.2.b). ITS 3.10.2 ACTION A covers the condition for one or more of the requirements in ITS LCO 3.10.2 not met and requires the immediate suspension of CORE ALTERATIONS except for control rod insertion, fully insert all insertable control rods in core cells containing one or more fuel assemblies, and within 1 hour either place the reactor mode switch in the shutdown or refuel position. Furthermore, two Surveillance Requirements have been added (ITS SR 3.10.2.1 and SR 3.10.2.2) to ensure these conditions are periodically met when using the allowances of this LCO. This changes the CTS by adding these limitations for reactor mode switch testing with the mode switch in the startup/hot standby position during MODE 5, adding an appropriate ACTION when the requirements are not met, and adding appropriate Surveillances to periodically ensure the LCO requirements are met. | LCO 3.10.2,<br>3.10.2 ACTION A,<br>SR 3.10.2.1,<br>SR 3.10.2.2 | 3.10.E |
| 3.10.6<br>M.1 | CTS 3.10.E does not include any restrictions on any allowed reload sequences. ITS LCO 3.10.6.c requires fuel assemblies to only be loaded in compliance with an approved reload sequence. In addition, ITS SR 3.10.6.3 requires the verification, every 24 hours, that fuel assemblies being loaded are in compliance with an approved reload sequence. This changes the CTS by placing restrictions on the reload sequence and providing a Surveillance to periodically verify the restriction is met. | LCO 3.10.6.c,<br>SR 3.10.6.3 | 3.10.E |
| 3.10.6<br>M.2 | CTS 3.10.E applies during extended core and control rod drive maintenance. CTS 3.10.E does not provide ACTIONS for when the requirements of the LCO are not met. ITS 3.10.6 ACTION A covers the condition for one or more of the requirements of LCO 3.10.6 not met and requires the immediate suspension of withdrawal of control rods and removal of associated control rod drive (CRD), suspension of loading fuel assemblies, initiation of action to fully insert all insertable control rods in core cells containing one or more fuel assemblies, and initiation of action to satisfy the requirements of LCO 3.10.6. This changes the CTS by adding an appropriate ACTION when the requirements of the LCO are not met. | 3.10.6 ACTION A | 3.10.E |
| 3.10.6<br>M.3 | CTS 3.10.E does not provide any Surveillance Requirements to periodically ensure the requirements of the LCO are met. ITS SR 3.10.6.1 requires verification, every 24 hours, that the four fuel assemblies are removed from core cells associated with each control rod or CRD | SR 3.10.6.1,<br>SR 3.10.6.3 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | removed. ITS SR 3.10.6.2 requires verification, every 24 hours, that all other control rods in core cells containing one or more fuel assemblies are fully inserted. This changes the CTS by adding two new Surveillance Requirements. | | |
| 4.0<br>M.1 | CTS 5.1 does not specify the boundary requirements for the low population zone. ITS 4.1.2 states that the low population zone is all the land within a one mile radius circle as shown in Chapter 15, Figure ND-95208 of the USAR. This changes the CTS by specifying the additional Design Feature for the Low Population Zone. | 4.1.2 | None |
| 4.0<br>M.2 | CTS 5.2.A states that the reactor core shall consist of not more than 484 fuel assemblies. ITS 4.2.1 contains a similar statement but provides a description of acceptable assemblies. This changes the CTS by specifying the types of fuel assemblies that can be placed into the reactor core. | 4.2.1 | 5.2.A |
| 4.0<br>M.3 | CTS 5.5.A does not specify the required $k_{eff}$ for the new fuel storage when moderated under optimum moderator conditions and does not specify the center to center distance between fuel assemblies in the new fuel storage racks. ITS 4.3.1.2.d specifies the $k_{eff}$ value under optimum moderator conditions and ITS 4.3.1.2.e specifies a minimum center to center distance between fuel assemblies placed in storage racks. This changes the CTS by specifying two additional design features for the new fuel storage rack that do not currently exist. | 4.3.1.2.d,<br>4.3.1.2.e | None |
| 4.0<br>M.4 | CTS 5.5.B does not specify the $k_{eff}$ value for the original fuel rack if fully flooded with unborated water and does not specify the spacing requirements for the fuel assemblies in the original or high density spent fuel storage racks. ITS 4.3.1.1.c state the value of $k_{eff}$ for the original fuel rack if fully flooded with unborated water and ITS 4.3.1.1.d specifies the spacing requirements of the fuel assemblies within the storage racks and the spacing requirements between the two types of storage racks. This changes the CTS by specifying two additional design features for the spent fuel storage racks that do not currently exist. | 4.3.1.1.c,<br>4.3.1.1.d | None |
| 4.0<br>M.5 | CTS 5.0 does not specify the elevation to which, by design, the spent fuel storage pool could be inadvertently drained. ITS 4.3.2 specifies the elevation that the spent fuel storage pool could be inadvertently drained to due to design. This changes the CTS by specifying the additional design feature for the spent fuel storage pool inadvertent drainage level. | 4.3.2 | None |
| 4.0<br>M.6 | CTS 5.0 does not specify the spent fuel storage pool design capacity limitations for fuel assemblies. ITS 4.3.3 specifies that the spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 2237 fuel assemblies. This changes the CTS by specifying the additional design feature for the spent fuel storage pool fuel assembly capacity. | 4.3.3 | None |
| 5.1<br>M.1 | ITS 5.1.1 requires that the plant manager or his designee approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety. | 5.1.1 | None |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| | The CTS does not include this requirement. This changes the CTS by adding an approval requirement for the plant manager or his designee. | | |
| 5.1<br>M.2 | CTS 6.1.A allows a designated individual to assume the responsibility for the control room command function when the shift supervisor is absent from the control room and shift supervisor's office. ITS 5.1.2 provides the allowance for the designated individual to assume the responsibility for the control room command function, but provides additional requirements for the designated individual. In MODE 1, 2, or 3, ITS 5.1.2 requires the designated individual hold an active Senior Operator license. In MODE 4 or 5, ITS 5.1.2 requires the designated individual hold an active Senior Operator license or Operator license. This changes the CTS by adding qualification requirements for the designated individual that assumes the control room command function. | 5.1.2 | 6.1.A |
| 5.2<br>M.1 | CTS 6.1.B.1, regarding documentation of the relationships between operating organization positions, states that the documentation be in "corporate and plant procedures," or in the Updated Safety Analysis Report (USAR) or Operational Quality Assurance Plan (OQAP). ITS 5.2.1.a states that the documentation shall be in the USAR or OQAP. This changes the CTS by requiring that this specific information be located only in the USAR or OQAP. | 5.2.1.a | 6.1.B.1 |
| 5.5<br>M.1 | The CTS does not include program requirements for a Component Cycle or Transient Limit Program, Safety Function Determination Program, or Battery Monitoring and Maintenance Program. The ITS includes programs for these activities. This changes the CTS be adding the following programs:<br><br>ITS 5.5.4, "Component Cyclic or Transient Limit";<br>ITS 5.5.10, "Safety Function Determination Program (SFDP)"; and<br>ITS 5.5.12, "Battery Monitoring and Maintenance Program." | 5.5.4,<br>5.5.10,<br>5.5.12 | None |
| 5.5<br>M.2 | CTS 4.9.B.3.b.3) includes a requirement to sample and check for quality of the diesel fuel every month. Currently, this is met by performing a viscosity check and a water and sediment check of the stored fuel oil in the common storage tank. In addition, no testing is currently required on new fuel oil prior to addition to the common storage tank. ITS 5.5.8.a restricts the acceptability of new fuel oil for use prior to addition to storage tanks by requiring the determination that the fuel oil has an API gravity within limit, a flash point and saybolt viscosity within limits, and a water and sediment content within limits. ITS 5.5.8.b requires all other properties of new fuel to be verified within 31 days following addition of the new fuel oil to the storage tank. ITS 5.5.8.c requires the total particulate concentration of the stored fuel oil to be $\leq$ 10 mg/l when tested every 31 days. This changes the CTS by providing restrictions on the acceptability of new fuel oil prior to addition to the common storage tank and providing a requirement that the total particulate concentration of the stored fuel oil be $\leq$ 10 mg/l when tested every 31 days. | 5.5.8.a,<br>5.5.8.b,<br>5.5.8.c | 4.9.B.3.b.3) |

Table M - More Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement |
|---|---|---|---|
| 5.6<br>M.1 | CTS Table 3.14.1 Required Condition A requires a report to be prepared and submitted within the next 30 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the inoperable Post Accident Monitoring Instrumentation to OPERABLE status. ITS 5.6.4 requires the same report to be prepared and submitted within 14 days. This changes the CTS by reducing the time required to prepare and submit a Post Accident Monitoring Report from 30 days to 14 days. | 5.6.4 | Table 3.14.1<br>Required Condition A |

# ATTACHMENT 4

## Table L - Less Restrictive Changes

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| 1.0<br>L.1 | CTS 1.0.A definition of Alteration of the Reactor Core applies to the act of moving "any component." However, the definition also states that the normal operating functions such as control rod movement using the normal drive mechanism, tip scans, SRM and IRM detector movements, etc., are not to be considered core alterations. The ITS Section 1.1 definition of CORE ALTERATION will only apply to the movement of "fuel, sources, or reactivity control components." In addition, the following exceptions are not considered to be CORE ALTERATIONS in the ITS: a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and b. control rod movement, provided there are no fuel assemblies in the associated core cell. This changes the CTS by eliminating from the definition of Alteration of the Core the movement of components that do not affect the reactivity of the core i.e., that are not fuel, sources, or reactivity control components, and also explicitly excludes local power range monitors and special moveable detectors from being a CORE ALTERATION. The change in the control rod movement portion of the definition is discussed in DOC M.2. | 1.1 | 1.0.A | **Note 1** |
| 1.0<br>L.2 | **The CTS 1.0.E definition of Instrument Functional Test requires the use of a "simulated" signal when performing the test. The ITS Section 1.1 CHANNEL FUNCTIONAL TEST definition allows the use of a "simulated or actual" signal when performing the test. This changes the CTS by allowing the use of unplanned** | **1.1** | **1.0.E** | **Note 1** |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | **actuations to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.** | | | |
| 1.0<br>L.3 | CTS 1.0.E defines Instrument Functional Test as the injection of a simulated signal "into the primary sensor." ITS Section 1.1 defines CHANNEL FUNCTIONAL TEST as the injection of a simulated or actual signal "into the channel as close to the sensor as practicable." This changes the CTS by allowing a signal to be injected "in the channel as close to the sensor as practicable" instead of "into the primary sensor." | 1.1 | 1.0.E | Note 1 |
| 2 | None | None | None | None |
| 3.0<br>L.1 | The CTS does not include any general LCO/ACTION guidance requirements. However, CTS 3.6.D.2 provides an explicit allowance that entry into a MODE is allowed when either a drywell floor drain sump monitoring system or the drywell particulate radioactivity monitoring system is inoperable. Thus, it is implicit that for all other Specifications, entry into a MODE or other specified condition in the Applicability of a Specification is not allowed. ITS LCO 3.0.4 is added to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the | LCO 3.0.4 | N/A | Note 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS by providing explicit guidance for entry into a MODE or other specified condition in the Applicability when an LCO is not met. | | | |
| 3.0 L.2 | ITS LCO 3.0.5 has been added to establish allowances for restoring equipment to service. ITS LCO 3.0.5 states "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY." This changes the CTS by adding the explicit allowance stated in LCO 3.0.5. | LCO 3.0.5 | N/A | Note 1 |
| 3.0 L.3 | CTS 4.0.B states, in part, "Specific time intervals between tests may be extended up to 25% of the surveillance interval." ITS SR 3.0.2 includes a similar requirement, but adds the following: "If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance | SR 3.0.2 | 4.0.B | Note 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | after the initial performance." This changes the CTS by adding an allowance that if a Required Action's Completion Time requires periodic performance on a "once per . . ." basis, the 25% Frequency extension applies to each performance after the initial performance. | | | |
| 3.0<br>L.4 | CTS 4.0.C states "Discontinued surveillance tests shall be resumed less than one test interval before establishing plant conditions requiring operability of the associated system or component." ITS SR 3.0.4 states "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS by allowing a discontinued Surveillance (a Surveillance discontinued due to being outside the Applicability of the LCO) to be met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. This also changes the CTS by allowing a change in MODES or other specified conditions in the Applicability when a Surveillance is not current, provided the change in MODES or other specified conditions in the Applicability are allowed by LCO 3.0.4, are required to comply with ACTIONS, or are part of a shutdown of the unit. | SR 3.0.4 | 4.0.C | Note 1 |
| 3.1.2 | CTS 3.3.E states, in part, "If the difference exceeds one per cent, | 3.1.2 ACTIONS A | 3.3.E | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.1 | delta k, reactor power operation shall not be permitted until the cause has been evaluated and appropriate corrective action has been completed." This effectively requires an immediate unit shutdown if the reactivity difference is greater than 1% k/k. ITS 3.1.2 ACTIONS A and B cover the condition when the reactivity anomaly criterion is not met. ITS 3.1.2 ACTION A requires restoration of the core reactivity difference to within limit in 72 hours. If this Required Action and Completion Time are not met, ITS 3.1.2 ACTION B requires the unit to be in MODE 3 in 12 hours. This changes the CTS by allowing 72 hours to restore the reactivity difference before commencing a shutdown. | and B | | |
| 3.1.2<br>L.2 | The Frequency of the reactivity anomaly Surveillance in CTS 4.3.E is at least every "equivalent full power month" (approximately 611 MWD/T, where T is a short ton), and it is required to be performed "At specific power operating conditions." ITS SR 3.1.2.1 requires this same test to be performed every 1000 MWD/T during operations in MODE 1. This changes the CTS by extending the Surveillance Frequency from 611 MWD/T to 1000 MWD/T, and specifies that the "specific power operating condition" is MODE 1. | SR 3.1.2.1 | 4.3.E | 7 |
| 3.1.3<br>L.1 | CTS 3.3.A.2.(a) states, in part, that control rod drives which cannot be moved "with control rod drive pressure" shall be considered inoperable. ITS 3.1.3 does not include this specific requirement. ITS 3.1.3 requires each control rod to be OPERABLE. A rod is considered OPERABLE, with respect to motion, if it can be inserted at least one notch using either scram pressure or normal control rod drive pressure (ITS SR 3.1.3.2 and SR 3.1.3.3) and, if it can be scrammed within $\leq$ 7.0 seconds (ITS SR 3.1.3.4). This changes the CTS by deleting the requirement to consider a control rod inoperable | None | 3.3.A.2.(a) | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | if it cannot be moved by control rod drive pressure alone. | | | |
| 3.1.3 L.2 | CTS 3.3.A.2.(b) requires, in part, the unit to be in hot shutdown within 48 hours if it is confirmed that a control rod drive collet housing failure is the cause of the stuck control rod. ITS 3.1.3 ACTION A covers the condition for one stuck control rod. Continuous operation is allowed regardless of the reason for the control rod being stuck. This changes the CTS by allowing continuous operation with any type of stuck rod even as a result of a control rod drive collet housing failure. | 3.1.3 ACTION A | 3.3.A.2.(b) | 4 |
| 3.1.3 L.3 | CTS 4.3.A.2.(a) requires each fully or partially withdrawn operable control rod to be exercised at least one notch "each week." ITS SR 3.1.3.2 requires a similar Surveillance for fully withdrawn control rods and ITS SR 3.1.3.3 requires a similar Surveillance for partially withdrawn control rods, however the Surveillance Frequency for ITS SR 3.1.3.3 is every 31 days. In addition, each Surveillance contains a Note that allows the performance of the Surveillance to be delayed for a certain time after the control rod is withdrawn and THERMAL POWER is greater than the low power setpoint (LPSP) of the rod worth minimizer (RWM). ITS SR 3.1.3.2 may be delayed for 7 days while ITS SR 3.1.3.3 may be delayed 31 days. This changes the CTS by extending the Surveillance Frequency from 7 days to 31 days for control rods that are partially withdrawn and provides a delay period for initial performance of the Surveillance after a control rod is withdrawn and THERMAL POWER is greater than the LPSP of RWM. | SR 3.1.3.2 Note, SR 3.1.3.3 including Note | 4.3.A.2.(a) | 7 |
| 3.1.3 L.4 | CTS 4.3.A.2.(b) states, in part, "each fully or partially withdrawn operable control rod shall be exercised at least one notch every 24 hour period" when a control rod is found to be stuck. When a control rod is stuck, ITS 3.1.3 Required Action A.3 states to perform SR 3.1.3.2 and SR 3.1.3.3 (the control rod insertion Surveillances for fully | 3.1.3 Required Action A.3 | 4.3.A.2.(b) | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | and partially withdrawn control rods) for each withdrawn OPERABLE control rod "24 hours from discovery of the stuck rod concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM." This changes the CTS by only requiring the test to be performed one time, and allows the test to be delayed up to 24 hours from discovery of the stuck rod concurrent with THERMAL POWER greater than the LPSP of the RWM. | | | |
| 3.1.3 L.5 | CTS 4.3.B.1.(b) states "when the rod is withdrawn the first time subsequent to each refueling outage, observe discernible response of the nuclear instrumentation. However, for initial rods when response is not discernible, subsequent exercising of these rods after the reactor is critical shall be performed to observe nuclear instrumentation response." ITS 3.1.3 does not include this requirement. This changes the CTS by eliminating the Surveillance Requirement to verify discernible nuclear instrumentation response when the rod is withdrawn. | None | 4.3.B.1.(b) | 5 |
| 3.1.3 L.6 | CTS 3.3.B.1 does not explicitly state when the control rod coupling requirements are required to be met, however it does state that the requirement is not applicable when moving a control rod drive for inspection as long as the reactor is in the refueling mode. CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours when the requirements of CTS 3/4.3.B.1 are not met. Thus, the implication is that CTS 3.3.B.1 is applicable in MODES 1, 2, and 3. ITS 3.1.3 states that the control rods must be OPERABLE in MODES 1 and 2 and ITS 3.1.3 ACTION E only requires the unit to be in MODE 3 (hot shutdown) within 12 hours when the actions are not met. This changes the CTS by only requiring the control rod coupling requirements to be met in MODES 1 and 2 and, concurrently, | 3.1.3 Applicability, 3.1.3 ACTION E | 3.3.B.1, 3.3.G.1 | 2 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | changes the shutdown action condition from cold shutdown (MODE 4) in 24 hours to hot shutdown (MODE 3) in 12 hours. | | | |
| 3.1.5<br>L.1 | CTS 4.3.D requires a check of the status in the control room of the required OPERABLE accumulator every 12 hours. ITS SR 3.1.5.1 requires a similar verification that the pressure in each accumulator is $\geq$ 940 psig every 7 days. This changes the CTS extending the Surveillance Frequency from once every 12 hours to every 7 days. | SR 3.1.5.1 | 4.3.D | 7 |
| 3.1.5<br>L.2 | CTS 4.3.D requires, in part, the check of the status in the control room of the required OPERABLE accumulator level alarm. The ITS does not include this requirement. This changes the CTS by deleting the requirement to verify the alarm for accumulator level in the control room. | None | 4.3.D | 6 |
| 3.1.5<br>L.3<br>Some items discussed in L.3 are A, some are M. They are all discussed here because they are related to the same issue of inoperable control rod scram accumulators. | CTS 3.3.D states, in part, that if a control rod with an inoperable accumulator is inserted full-in and is disarmed, it shall not be considered to have an inoperable accumulator. CTS 3.3.D.1 also states a control rod scram accumulator may be inoperable provided that no other control rod within two control rod cells in any direction has an inoperable accumulator or a directional control valve electrically disarmed while in a non-fully inserted position. CTS 3.3.G.1 states, in part, that if Specification 3.3.D is not met, an orderly shutdown shall be initiated and the reactor shall be placed in the cold shutdown (MODE 4) condition within 24 hours. CTS 3.3.D and CTS 3.3.D.1 do not provide any time to insert control rods associated with inoperable control rod accumulators, therefore as soon as it is determined that a control rod accumulator is inoperable and the provisions of CTS 3.3.D.1 are not met, CTS 3.3.G.1 must be immediately entered. ITS 3.1.5 ACTION A covers the condition of one control rod scram accumulator inoperable with reactor steam | 3.1.5 ACTIONS A, B, and C | 3.3.D, 3.3.D.1, 3.3.G.1 | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | dome pressure $\geq$ 900 psig, and requires the declaration within 8 hours that either the associated control rod scram time is slow (ITS 3.1.5 Required Action A.1) or the associated control rod is inoperable (ITS 3.1.5 Required Action A.2). The requirement to declare the associated control rod slow is only applicable if the associated control rod scram time was within limits during the last scram time Surveillance. ITS 3.1.5 ACTION B covers the Condition for two or more control rod scram accumulators inoperable with reactor steam dome pressure $\geq$ 900 psig, and requires the restoration of charging water header pressure to $\geq$ 940 psig within 20 minutes from discovery of Condition B (i.e., two or more control rod scram accumulators inoperable with steam dome pressure $\geq$ 900 psig) concurrent with charging water header pressure < 940 psig (ITS 3.1.5 Required Action B.1) and within 1 hour to either declare the associated control rod scram time slow (ITS 3.1.5 Required Action B.2.1) or declare the associated control rod inoperable (ITS 3.1.5 Required Action B.2.2). The requirement to declare the associated control rod scram time slow is only applicable if the associated control rod scram time was within limits during the last scram time Surveillance. ITS 3.1.5 ACTION C covers the condition for one or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig, and requires the immediate verification that all control rods associated with inoperable accumulators are fully inserted upon discovery of charging water header pressure < 940 psig (ITS 3.1.5 Required Action C.1) and the declaration within 1 hour that the associated control rod is inoperable (ITS 3.1.5 Required Action C.2). | | | |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ITS 3.1.5 ACTION D covers the condition when Required Action B.1 or C.1 and associated Completion Time is not met, and requires the immediate placement of the reactor mode switch in the shutdown position (Required Action D.1). This Required Action is not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods. This changes the CTS in several ways, some administrative, some more restrictive, and some less restrictive. | | | |
| 3.1.6 L.1 | CTS 3.3.B.3.(a) requires the control rod withdrawal sequences to be established but does not explicitly specify the Applicability of the control rod withdrawal sequences. However, CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.3.B.3.(a) is not met. Thus this implicitly requires the control rod withdrawal sequence to be met in MODES 1, 2, and 3. ITS LCO 3.1.6 requires all OPERABLE control rods to be in compliance with the bank position withdrawal sequence in MODES 1 and 2 with THERMAL POWER $\leq$ 10% RTP. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS. | 3.1.6 Applicability | 3.3.B.3.(a), 3.3.G.1 | 2 |
| 3.1.6 L.2 | CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if the requirement of CTS 3.3.B.3.(a) (control rod withdrawal sequence requirement) is not met. ITS 3.1.6 ACTION A covers the condition when one or more OPERABLE control rods are not in compliance with BPWS, and requires the associated control rod(s) to be moved to the correct position or to declare the associated control rod(s) inoperable within 8 hours. A Note is included for ITS 3.1.6 Required Action A.1 that states the rod worth minimizer (RWM) may be bypassed as allowed by LCO 3.3.2.1, "Control Rod Block Instrumentation." ITS 3.1.6 ACTION B covers the condition when | 3.1.6 ACTIONS A and B | 3.3.G.1 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | nine or more OPERABLE control rods are not in compliance with BPWS, and requires the immediate suspension of control rod withdrawal and requires the reactor mode switch to be placed in the shutdown position within 1 hour. A Note similar to the one for ITS 3.1.6 Required Action A.1 is included for ITS 3.1.6 Required Action B.1. This changes the CTS by adding specific ACTIONS for OPERABLE control rods not in compliance with BPWS, in lieu of a shutdown to MODE 4. | | | |
| 3.1.7 L.1 | CTS 3.4.A does not provide actions for when two SLC subsystems are inoperable, thus CTS 3.4.C must be entered and the unit must be placed in hot shutdown. ITS 3.1.7 ACTION C covers the condition when two SLC subsystems are inoperable for reasons other than Condition A (i.e., boron concentration not within limits), and requires the restoration of one SLC subsystem to OPERABLE status within 8 hours. This changes the CTS by providing 8 hours to restore one SLC subsystem to OPERABLE status when it is discovered that both SLC subsystems are inoperable prior to requiring a unit shutdown. | 3.1.7 ACTION C | 3.4.C | 3 |
| 3.1.7 L.2 | CTS 4.4.A.1 requires the performance of a SLC pump test. It also states "Comparison of the measured pump flow rate against equation 2 of paragraph 3.4.B.1 shall be made to demonstrate operability of the system in accordance with the ATWS Design Basis." ITS SR 3.1.7.7 requires the SLC pump test, but does not include the requirement about the demonstration of the OPERABILITY of the system in accordance with the ATWS Design Basis. This changes the CTS by deleting the requirement to perform this comparison. | None | 4.4.A.1 | 5 |
| 3.1.7 L.3 | CTS 4.4.B.1 requires the boron enrichment to be determined at least once per cycle. The laboratory analysis to determine enrichment shall be obtained within 30 days of sampling or chemical addition. ITS SR | SR 3.1.7.10 | 4.4.B.1 | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | 3.1.7.10 requires the determination of B-10 enrichment is $\geq$ 55.0 atom percent B-10 prior to addition to the SLC tank. This changes the CTS by deleting the requirement to verify the storage tank enrichment every cycle and replaces it with a requirement to verify that the solution added to the SLC storage tank is at the proper B-10 enrichment. | | | |
| 3.1.8<br>L.1 | CTS 3.3.F.2.a allows 7 days of continuous operation with any number of SDV drain or vent valves inoperable as long as the redundant valve (i.e., the one in the same line) is verified to be OPERABLE on a daily basis. After the 7 day period, CTS 3.3.F.2.b requires that either the inoperable valve(s) or the associated redundant valve(s) be closed. However, if one valve has been inoperable for greater than 7 days and the valve or its redundant valve is closed, and another valve in a different line becomes inoperable, the CTS does not allow a separate 7 day time to restore the valve; the second inoperable valve or its redundant valve must be closed immediately in order to meet the requirements of CTS 3.3.F.2.b. ITS 3.1.8 ACTIONS are modified by a Note 1 that states "Separate Condition entry is allowed for each SDV vent and drain line." ITS 3.1.8 ACTION A covers inoperabilities for one or more SDV vent or drain lines with one valve inoperable. ITS 3.1.8 ACTION B covers inoperabilities for one or more SDV vent or drain lines with both valves inoperable. This changes the CTS by allowing separate Condition entry for each inoperable SDV vent or drain line. That is, under the same scenario described above, the second inoperable valve will get a 7 day restoration time before the associated line must be isolated. Other modifications associated with CTS 3.3.F.2.a and CTS 3.3.F.2.b are discussed in DOCs A.2, L.2, and L.3. | 3.1.8 ACTIONS Note 1 | 3.3.F.2.a, 3.3.F.2.b | 4 |

## Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| 3.1.8<br>L.2 | When any scram discharge volume vent or drain valve is made or found inoperable and the associated line is not isolated, CTS 3.3.F.2.a requires daily verification of the OPERABILITY of the redundant valve(s). ITS 3.1.8 ACTION A covers the condition when one SDV vent or drain valve is inoperable in one or more SDV vent or drain lines, but does not require daily verification of the OPERABILITY of the redundant valve in the associated line if the line is not isolated. This changes the CTS by deleting the requirement to verify the OPERABILITY of the redundant valve(s) on a daily basis if the associated line is not isolated. | 3.1.8 ACTION A | 3.3.F.2.a | 4 |
| 3.1.8<br>L.3 | When any scram discharge volume vent or drain valve is made or found inoperable, CTS 3.3.F.2.a allows, for a period not to exceed 7 days, the associated line to remain unisolated provided the redundant valve in the line is OPERABLE. If both valves in a SDV line are inoperable, CTS 3.3.F.2.b requires "maintaining" the inoperable valve(s) or the associated redundant valve(s) in the closed position. This effectively means that if both valves in a SDV line are inoperable, the line must be isolated immediately. ITS 3.1.8 ACTION B covers the condition when both valves are inoperable in one or more SDV vent or drain lines. ITS 3.1.8 Required Action B.1 requires isolation of the associated line within 8 hours. This changes the CTS by allowing 8 hours to isolate a vent or drain line in lieu of requiring it to be isolated immediately when both valves are determined to be inoperable. | 3.1.8 Required Action B.1 | 3.3.F.2.b | 3 |
| 3.1.8<br>L.4 | CTS 3.3.F.2 requires the insertion of all OPERABLE control rods within ten hours if the compensatory actions of CTS 3.3.F.2.a and b cannot be met. ITS 3.1.8 ACTION C requires the unit to be in MODE 3 in 12 hours. This change increases the time to insert all | 3.1.8 ACTION C | 3.3.F.2 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | OPERABLE control rods (i.e., to be in MODE 3 as discussed in DOC A.3) from 10 hours to 12 hours. | | | |
| 3/4.3.B.2<br>L.1 | CTS 3/4.3.B.2 requires the control rod drive housing support system to be in place during reactor power operation and when the reactor coolant system is pressurized above atmospheric pressure with fuel in the reactor vessel, unless all operable control rods are fully inserted and Specification 3.3.A.1 is met. CTS 4.3.B.2 requires the control rod drive housing support system to be inspected after reassembly and the results of the inspection recorded. ITS 3.1 does not include the requirements for the control rod drive housing support system. This changes the CTS by deleting the explicit control rod drive housing support system requirements from the Technical Specifications. | None | 3/4.3.B.2 | 1 |
| 3.2.1<br>L.1 | CTS 4.11.A requires the APLHGR to be determined daily during reactor operation at ≥ 25% rated thermal power. ITS SR 3.2.1.1 requires the same verification "once within 12 hours after ≥ 25% RTP and 24 hours thereafter." This changes the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance. | SR 3.2.1.1 | 4.11.A | 7 |
| 3.2.2<br>L.1 | CTS 4.11.C requires the MCPR to be determined daily during reactor operation at ≥ 25% rated thermal power. ITS SR 3.2.2.1 requires the same verification "once within 12 hours after ≥ 25% RTP and 24 hours thereafter." This changes the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance. | SR 3.2.2.1 | 4.11.C | 7 |
| 3.2.2<br>L.2 | CTS 4.11.C states MCPR shall be determined daily and "following any change in power level or distribution which has the potential of bringing the core to its operating MCPR." ITS SR 3.2.2.1 requires a | SR 3.2.2.1 | 4.11.C | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | similar daily verification, but does not include the additional Frequency based on a change in power level or distribution. This changes the CTS by deleting the requirement to verify MCPRs are within limits "following any change in power level or distribution which has the potential of bringing the core to its operating MCPR." | | | |
| 3.2.3<br>L.1 | CTS 4.11.B requires the LHGR to be determined daily during reactor operation at ≥ 25% rated thermal power. ITS SR 3.2.3.1 requires the same verification "once within 12 hours after ≥ 25% RTP and 24 hours thereafter." This changes the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance. | SR 3.2.3.1 | 4.11.B | 7 |
| 3.3.1.1<br>L.1 | CTS 3.1.A states that the initiation of "any" channel trip to the de-energization of the scram pilot valve solenoids shall not exceed 50 milliseconds. This is essentially a response time requirement. ITS SR 3.3.1.1.14 requires the verification of the RPS RESPONSE TIME. ITS Table 3.3.1.1-1 requires the RPS RESPONSE TIME test to be performed on certain RPS Functions, but not all RPS Functions. This changes the CTS by requiring the testing to be performed only on certain Functions. | SR 3.3.1.1.14 | 3.1.A | 1 |
| 3.3.1.1<br>L.2 | When more than one instrument channel is inoperable for one or more trip functions, CTS 3.1.B.2 requires the immediate placement of the appropriate channel(s) or trip system(s) in the tripped condition. ITS 3.3.1.1 ACTION A covers the situation when one or more required channels are inoperable, and allows 12 hours to either place the channel in trip or to place the associated trip system in trip. ITS 3.3.1.1 ACTION B covers the condition for one or more Functions with one or more required channels inoperable in both trip systems, and requires either the placement of the inoperable channel in one trip | 3.3.1.1 ACTIONS A, B, and C | 3.1.B.2 | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | system in trip or the placement of one trip system in trip within 6 hours. ITS 3.3.1.1 ACTION C covers the condition for one or more Functions with RPS trip capability not maintained, and allows one hour to restore RPS trip capability. This changes the CTS by allowing 6 hours to take action instead of requiring immediate action to be taken. | | | |
| 3.3.1.1<br>L.3 | CTS Table 3.1.1 requires the Mode Switch in Shutdown, Manual Scram, Neutron Flux IRM High - High, Neutron Flux IRM Inoperative, Scram Discharge Volume High Level (East and West) Trip Functions (CTS Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b, respectively) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run (for Trip Functions 1, 2, 8.a, and 8.b only) positions. Furthermore, CTS Table 3.1.1 Note (3) states that these Functions are the only RPS Trip Functions that are required to be OPERABLE when in the refueling mode with the reactor subcritical and reactor water temperature less than 212°F. (The Note 3 reference to High Flux IRM refers to both the Neutron Flux IRM High - High and Inoperative Functions.) CTS Table 3.1.1 footnote **.a allows the Scram Discharge Volume High Level Trip Function to be bypassed in the Refuel mode. During this time, a control rod block is inserted. ITS Table 3.3.1.1-1 requires these Functions to be OPERABLE during MODES 1 (Functions 7.a, 7.b, 10, and 11 only) and 2 and in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies (Table 3.3.1.1-1 Footnote (a)). This changes the CTS by only requiring these RPS Trip Functions to be OPERABLE when the reactor mode switch is in the refuel position and one or more vessel head closure bolts are less than fully tensioned (i.e., MODES) only when a control rod is | Table 3.3.1.1-1 Functions 1.a, 1.b, 7.a, 7.b, 10, and 11 including footnote (a) | Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b, including Note 3 and footnote **.a | 2 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | withdrawn from a core cell containing one or more fuel assemblies. | | | |
| 3.3.1.1<br>L.4 | CTS Table 3.1.1 footnote **.f provides guidance for the bypass of certain RPS instrument channels, and states "One instrument channel for the functions indicated in the table to allow completion of surveillance testing, provided that: 1) Redundant instrument channels in the same trip system are capable of initiating the automatic function and are demonstrated to be operable either immediately prior or immediately subsequent to applying the bypass; and 2) while the bypass is applied, surveillance testing shall proceed on a continuous basis and the remaining instrument channels initiating the same function are tested prior to any other. Upon completion of surveillance testing, the bypass is removed." ITS Table 3.3.1.1 does not include this Note. This changes the CTS by deleting CTS Table 3.1.1 footnote **.f. | None | Table 3.1.1 footnote **.f | 7 |
| 3.3.1.1<br>L.5 | CTS Table 4.1.1 specifies the requirements for the functional test of various RPS Functions. The functional test requires testing of the "trip channel" and "alarm" for the High Reactor Pressure, High Drywell Pressure, Low Reactor Water Level, High Water Level in Scram Discharge Volume, Main Steam Line Isolation Valve Closure, Turbine Stop Valve Closure, Manual Scram, Turbine Control Valve Fast Closure, and IRM channels, and the functional test requires testing of the "trip output relays" for the APRM/Flow Reference channels and requires the actual placement of the mode switch in the shutdown position for the Mode Switch in Shutdown channels. CTS Table 4.1.2 Note (4) states APRM channel alarms and trips will be verified and calibrated if necessary during functional testing.<br>ITS SR 3.3.1.1.3, SR 3.3.1.1.4, SR 3.3.1.1.7, and SR 3.3.1.1.10 require the performance of a CHANNEL FUNCTIONAL TEST, but do | SR 3.3.1.1.3, SR 3.3.1.1.4, SR 3.3.1.1.7, and SR 3.3.1.1.10 | Table 4.1.1 (for Reactor High Pressure, High Drywell Pressure, Low Reactor Water Level, High Water Level in Scram Discharge Volume, Main Steam Line Isolation Valve Closure, Turbine Stop Valve Closure, Manual Scram, Turbine Control | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm," "Trip Output relays," and "Place mode switch in shutdown." | | Valve Fast Closure, IRM, and APRM/Flow Reference channels), Table 4.1.2 Note 4 | |
| 3.3.1.1<br>L.6 | CTS Table 4.1.1 Note 3 applies to the IRM channels and requires a demonstration that the IRM and APRM channels overlap at least 1/2 decade prior to every normal shutdown. This test is not included in ITS 3.3.1.1. This changes the CTS by deleting the IRM/APRM overlap test. | None | Table 4.1.1 Note 3 | 5 |
| 3.3.1.1<br>L.7 | CTS Table 4.1.2 requires the performance of an APRM calibration once every 3 days. CTS Table 4.1.2 Note 4 states that this calibration is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 requires the verification that the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq$ 2% RTP every 7 days. This changes the CTS by extending the Frequency of testing from 3 days to 7 days. The change adding in an acceptance criterion is discussed in DOC M.4. | SR 3.3.1.1.2 | Table 4.1.2 (for APRM) including Note 4 | 7 |
| 3.3.1.1<br>L.8 | CTS Table 4.1.2 requires the performance of an APRM calibration once every 3 days. CTS Table 4.1.2 Note 4 states that this calibration is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 requires the verification that the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq$ 2% RTP every 7 days. A Note to ITS SR 3.3.1.1.2 states that the Surveillance is not required to be performed until 12 hours after | SR 3.3.1.1.2 including Note | Table 4.1.2 (for APRM) including Note 4 | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | THERMAL POWER ≥ 25% RTP. This changes the CTS by allowing the plant to enter MODE 1 without meeting the 7 day Frequency and adding the explicit time restraint to complete the test within 12 hours of exceeding 25% RTP. The change to the Frequency is discussed in DOC L.7 and the change adding in an acceptance criterion is discussed in DOC M.4. | | | |
| 3.3.1.1<br>L.9 | CTS Table 4.1.2 provides the calibration method (i.e., heat balance, pressure standard, water level, or observation) for each RPS Instrument Channel. ITS 3.3.1.1 does not include this information in the associated SRs. This changes the CTS by deleting the calibration method from the CTS. | None | Table 4.1.2 | 6 |
| 3.3.1.1<br>L.10 | CTS Table 4.1.2 Note 1 requires the performance of an IRM calibration during every startup and normal shutdown. ITS Table 3.3.1.1 Function 1 (IRM) requires the performance of SR 3.3.1.1.11, a CHANNEL CALIBRATION, every 24 months. In addition, Note 2 allows the test to be delayed until 12 hours after entering MODE 2 from MODE 1. This changes the CTS by changing the Frequency for an IRM calibration from every startup and normal shutdown to 24 months and allows the Surveillance to be delayed during a shutdown until 12 hours after entering MODE 2 from MODE 1. | SR 3.3.1.1.11 including Note 2 | Table 4.1.2 Note 1 | 7 |
| 3.3.1.1<br>L.11 | CTS 1.0.F requires the performance of a response time test once per cycle. ITS SR 3.3.1.1.14 requires the performance of a RPS RESPONSE TIME test every 24 months "on a STAGGERED TEST BASIS." ITS SR 3.3.1.1.14 is modified by a Note that states, "For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency." This changes the CTS by allowing the testing to be performed on a 24 month "STAGGERED TEST BASIS" instead of every 24 months. The change from once per | SR 3.3.1.1.14 including Note | 1.0.F | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | cycle Frequency to a 24 month Frequency is discussed in DOC A.9. | | | |
| 3.3.1.1<br>L.12 | CTS 3.1.A refers to the "setpoints" of the RPS Instrumentation Functions in CTS Table 3.1.1 and CTS Table 3.1.1 specifies the "Limiting Trip Settings" for the RPS Instrumentation Functions. The Limiting Trip Setting of CTS Table 3.1.1 Trip Functions 3.a, 4.a, and 4.c have been modified to use Allowable Values as indicated for ITS Table 3.3.1.1-1 Functions 1.a and 2.a. This changes the CTS by requiring the RPS Instrumentation to be set consistent with the "Allowable Value" instead of a more-restrictive "Operability" limit. The change in the term "Limiting Trip Settings" to "Allowable Value" is discussed in DOC A.16. | Table 3.3.1.1-1 Functions 1.a and 2.a | Table 3.1.1 Trip Functions 3.a, 4.a, and 4.c | 10 |
| 3.3.1.1<br>L.13 | CTS Table 4.1.2 requires the performance of an IRM calibration. ITS Table 3.3.1.1 Function 1 (IRM) requires the performance of SR 3.3.1.1.11, a CHANNEL CALIBRATION, however, the Surveillance includes a Note (Note 1) that excludes the neutron detectors from the calibration. This changes the CTS by not requiring the IRM neutron detectors to be tested. | SR 3.3.1.1.11 Note 1 | Table 4.1.2 (for IRM) | 6 |
| 3.3.1.1<br>L.14<br>BSI 2 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 4.1.1 requires a weekly functional test of the Manual Scram Function. ITS Table 3.3.1.1-1 Function 11 and ITS SR 3.3.1.1.5 requires the performance of the same test at a 31 day Frequency. This changes the CTS by extending the Manual Scram functional test Frequency from 7 days to 31 days. | SR 3.3.1.1.5 | Table 4.1.1 (for Manual Scram Function) | Note 1 |
| 3.3.1.2<br>L.1 | CTS 3.10.B requires two SRMs to be OPERABLE during core alterations, one in the core quadrant where fuel or control rods are being moved and one in an adjacent quadrant. ITS SR 3.3.1.2.2.a | SR 3.3.1.2.2 including Note 2, Table 3.3.1.2-1 | 3.10.B | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ensures an OPERABLE SRM is in the fueled region, and Note 2 to ITS SR 3.3.1.2.2 adds an allowance that one SRM may be used to satisfy more than one SRM location requirement. ITS Table 3.3.1.2-1 Footnote (b) allows the number of SRM channels required to be OPERABLE to be reduced from two to one "during spiral offload or reload when the fueled region includes only that SRM detector." This changes the CTS by requiring only one SRM to be OPERABLE during CORE ALTERATIONS that encompass special offloading and reloading when the fueled region includes only that SRM detector. | Footnote (b) | | |
| 3.3.1.2<br>L.2 | CTS 3.3.G.1, in part, requires the unit to be in cold shutdown in 24 hours if the conditions of CTS 3.3.B.4 are not met. ITS 3.3.1.2 ACTIONS A and B provide allowances to restore inoperable SRMs in MODE 2 with the IRMs on Range 2 or below prior to requiring a unit shutdown. ITS 3.3.1.2 ACTION A allows 4 hours to restore one or more inoperable required SRM channels to OPERABLE. Furthermore, ITS 3.3.1.2 ACTION B requires immediate suspension of all control rod withdrawal if there are no OPERABLE required SRMs. This changes the CTS by providing an allowance to restore inoperable SRMs, in MODE 2 with IRMs on Range 2 or below, before requiring a unit shutdown. | 3.3.1.2 ACTIONS A and B | 3.3.G.1 | 4 |
| 3.3.2.1<br>L.1 | CTS 3.2.C.2.a.(2) requires control rod withdrawal to be blocked within 24 hours if one channel is inoperable. CTS 3.2.C.2.a.(3) requires control rod withdrawal to be blocked immediately if two RBM channels are inoperable. ITS 3.3.2.1 Required Action A.1 allows 24 hours to restore one inoperable RBM channel. ITS 3.3.2.1 ACTION B allows 1 hour to place a RBM channel in trip if the Required Action and associated Completion Time of Condition A is not met, or if two RBM channels are inoperable. This changes the CTS by providing an | 3.3.2.1 Required Action A.1, 3.3.2.1 ACTION B | 3.2.C.2.a.(2), 3.2.C.2.a.(3) | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | additional 1 hour to evaluate and restore the inoperable RBM channels before requiring a channel to be placed in trip, thereby blocking control rod withdrawal. | | | |
| 3.3.2.1<br>L.2 | CTS 4.2.C requires performance of an instrument functional test of the OPERABLE RBM when one RBM channel is inoperable.<br>ITS 3.3.2.1 does not include this Surveillance. This changes the CTS by deleting this Surveillance. | None | 4.2.C | 5 |
| 3.3.2.1<br>L.3 | CTS 3.2.C does not provide a delayed entry into associated Conditions and Required Actions if a RBM channel is inoperable for performance of required Surveillances. ITS 3.3.2.1 Surveillance Requirements Note 2 allows delayed entry into associated Conditions and Required Actions for up to 6 hours if a RBM channel is placed in an inoperable status for performance of required Surveillances provided the associated Function maintains rod block capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for a RBM channel placed in an inoperable status solely for performance of required Surveillances. | 3.3.2.1 Surveillance Requirements Note 2 | None | 4 |
| 3.3.2.1<br>L.4 | CTS 3.3.B.3.(b) allows reactor startup to continue with the rod worth minimizer inoperable only if ≥ 12 control rods have already been withdrawn. ITS 3.3.2.1 Required Action C.2.1.2 allows startup to continue with the RWM inoperable and < 12 rods withdrawn if it is verified that a startup with the RWM inoperable has not been performed in the last 12 months. This changes the CTS by providing an additional allowance to continue rod withdrawal with a RWM inoperable. | 3.3.2.1 Required Action C.2.1.2 | 3.3.B.3.(b) | 4 |
| 3.3.2.1<br>L.5<br>BSI 3 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation *** | None | 3.2.C.2.b | Note 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | CTS 3.2.C.2.b states that the RBM bypass time delay must be less than or equal to 2.0 seconds. ITS 3.3.2.1 does not require the RBM bypass time delay to be OPERABLE. This changes the CTS by deleting the RBM bypass time delay requirements. | | | |
| 3.3.2.1<br>L.6 | CTS Table 3.2.3 specifies the "Trip Settings" for the RBM instrumentation. The Trip Setting of CTS Table 3.2.3 Function 4.b has been modified to reflect a new Allowable Value as indicated in ITS Table 3.3.2.1-1 Function 1.e. This changes the CTS by requiring the RBM Downscale instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Settings" to "Allowable Value" is discussed in DOC A.4. | Table 3.3.2.1-1 Function 1.e | Table 3.2.3 Function 4.b | 10 |
| 3.3.3.1<br>L.1 | CTS 3.14 is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212°F.<br>Consistent with this Applicability, CTS Table 3.14.1 Required Condition B, requires a shutdown to Cold Shutdown (MODE 4) to place the unit outside the Applicability of CTS 3.14. ITS LCO 3.3.3.1 is applicable in MODES 1 and 2. Consistent with this new Applicability, ITS 3.3.3.1 ACTION E only requires a unit shutdown to MODE 3. This changes the CTS by not requiring PAM instrumentation to be OPERABLE in MODE 3 (i.e., reactor water temperature above 212°F and, consistent with this Applicability, only requiring the unit to be shut down to MODE 3 instead of to MODE 4. | 3.3.3.1 Applicability, 3.3.3.1 ACTION E | 3.14, Table 3.14.1 Required Condition B | 2 |
| 3.3.3.1<br>L.2<br>BSI 4 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br>CTS 4.14 does not provide a delayed entry into associated Conditions and Required Actions if a PAM channel is inoperable solely for performance of required Surveillances. ITS 3.3.3.1 Surveillance | 3.3.3.1 Surveillance Requirements Note 2 | None | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | Requirements Note 2 has been added to allow delayed entry into associated Conditions and Required Actions for up to 6 hours if a PAM channel is placed in an inoperable status solely for performance of required Surveillances provided the associated Function maintains capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for a PAM channel placed in an inoperable status solely for performance of required Surveillances. | | | |
| 3.3.3.1<br>L.3 | CTS Table 3.14.1 Required Condition A allows 7 days to restore an inoperable PAM channel when the number of OPERABLE channels is one less than the total number of channels (i.e., one of the two channels inoperable). ITS 3.3.3.1 ACTION A allows 30 days to restore an inoperable required channel to OPERABLE status when one of the two channels of a PAM Function is inoperable. This changes the CTS by extending the time to restore an inoperable PAM instrumentation channel from 7 days to 30 days. | 3.3.3.1 ACTION A | Table 3.14.1 Required Condition A | 3 |
| 3.3.3.1<br>L.4 | CTS Table 3.14.1 Required Condition B allows 48 hours to restore an inoperable PAM channel when the number of OPERABLE channels is less than the minimum number of channels (i.e., both of the channels are inoperable). This Required Condition applies to the Reactor Vessel Fuel Zone Water Level, Drywell Wide Range Pressure, and Suppression Pool Wide Range Level PAM channels. ITS 3.3.3.1 ACTION C allows 7 days to restore one required inoperable channel to OPERABLE status when both of the channels of a PAM Function are inoperable. This changes the CTS by extending the time to restore an inoperable PAM instrumentation channel, when two channels are inoperable in the same Function, from 48 hours to 7 days. | 3.3.3.1 ACTION C | Table 3.14.1 Required Condition B | 3 |
| 3.3.3.1 | CTS Table 3.14.1 Required Condition D requires immediate initiation | 3.3.3.1 | Table 3.14.1 | 3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.5 | of the preplanned alternate method of monitoring the appropriate parameters and the submittal of the report required by Required Condition A if the number of OPERABLE channels is less than the minimum number of channels (i.e., both of the channels are inoperable). This Required Condition applies to the Suppression Pool Temperature and Drywell High Range Radiation PAM channels. ITS 3.3.3.1 ACTION C allows 7 days to restore one required inoperable channel to OPERABLE status when both of the channels of a PAM Function are inoperable. This changes the CTS by providing a 7 day restoration time when two channels are inoperable in the same Function prior to requiring the submittal of a report. | ACTION C | Required Condition D | |
| 3.3.3.2<br>L.1 | CTS 3.13.A.1 states that the Alternate Shutdown System controls on the ASDS panel shall be OPERABLE whenever that system or component is required to be OPERABLE. For the system and components covered by this Specification, the Applicability that covers the most conditions is whenever irradiated fuel is in the reactor vessel and the reactor water temperature is greater than 212°F (i.e., the RHR pumps Applicability). In addition, when the restoration time provided by CTS 3.13.A.2.b has expired, CTS 3.13.A.2.d requires placing the reactor in a condition where the systems for which the system controls at the ASDS are inoperable are not required to be OPERABLE in 24 hours. ITS LCO 3.3.3.2 is applicable in MODES 1 and 2. Consistent with this Applicability change, ITS 3.3.3.2 ACTION B requires the plant to be in MODE 3 within 12 hours. This changes the CTS by not requiring the Alternate Shutdown System to be OPERABLE in MODE 3 (i.e., reactor water temperature above 212°F and, consistent with this Applicability, only requiring the unit to be shut | 3.3.3.2 Applicability,<br>3.3.3.2 ACTION B | 3.13.A.1, 3.13.A.2.d | 2 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | down to MODE 3 instead of to MODE 4. | | | |
| 3.3.3.2<br>L.2 | CTS 3.13.A.2 allows 7 days to restore an inoperable Alternate Shutdown System Function. ITS 3.3.3.2 ACTION A allows 30 days to restore one required inoperable Function to OPERABLE status. This changes the CTS by extending the time to restore an inoperable Alternate Shutdown System Function from 7 days to 30 days. | 3.3.3.2 ACTION A | 3.13.A.2 | 3 |
| 3.3.4.1<br>L.1 | CTS Table 3.2.5 Note 1 provides an Action for an inoperable ATWS-RPT trip system (i.e., one or two channels in the trip system inoperable) and allows 14 days to restore the trip system to OPERABLE status. If the trip system is not restored to OPERABLE status, or if both trip systems are inoperable, the plant must be placed in at least Startup in 8 hours. ITS 3.3.4.1 includes an ACTIONS Note that allows separate Condition entry for each channel.<br>ITS 3.3.4.1 ACTION A covers the condition for one or more channels inoperable, and allows either 14 days to restore the channel to OPERABLE status or to place the channel in trip. The allowance to place the channel in trip is not applicable if the inoperable channel is the result of an inoperable breaker. ITS 3.3.4.1 ACTION B covers the condition of one Function (Reactor Vessel Water Level - Low Low or Reactor Vessel Steam Dome Pressure - High) with ATWS-RPT trip capability not maintained (i.e., both trip systems for a Function inoperable), and requires restoration of ATWS-RPT trip capability (i.e., restoration of one of the two trip systems) within 72 hours. If both ATWS-RPT Functions do not have trip capability (i.e., both trip systems for a Function inoperable), ITS 3.3.4.1 ACTION C requires restoration of the ATWS-RPT trip capability (i.e., restoration of one of the two trip systems) for one Function within 1 hour. This changes the CTS in several ways: a) it allows 14 days to restore each | 3.3.4.1 ACTIONS Note, 3.3.4.1 ACTIONS A, B, and C | Table 3.2.5 Note 1 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | inoperable channel instead of the current requirement to restore all channels in a trip system to OPERABLE status in 14 days; b) it allows an inoperable channel to be placed in trip in lieu of restoring the channel to OPERABLE status; c) it allows 72 hours to restore ATWS-RPT trip capability (i.e., restore one of the two trip systems) for a Function that has two inoperable trip systems prior to requiring a plant shutdown to MODE 2; and d) when both Functions have two inoperable trip systems, it allows 1 hour to restore ATWS-RPT trip capability (i.e., restore one of the two trip systems) for one of the two Functions prior to requiring a plant shutdown to MODE 2. | | | |
| 3.3.4.1 L.2 | CTS Table 3.2.5 Required Condition A requires the unit to be in Startup, Refuel or Shutdown Mode if the Required Actions provided in Note 1 are not met. ITS 3.3.4.1 Required Action D.2 includes a similar requirement, but ITS 3.3.4.1 Required Action D.1 also allows the removal of the affected recirculation pump from service in lieu of shutdown to MODE 2. This Required Action is only applicable if the inoperable channel is the result of an inoperable breaker. This changes the CTS by allowing the breaker to be tripped instead of exiting the MODE 1. | 3.3.4.1 Required Action D.1 | Table 3.2.5 Required Condition A | 4 |
| 3.3.4.1 L.3 | CTS Table 3.2.5 does not provide a delayed entry into associated Conditions and Required Actions if an ATWS-RPT channel is inoperable solely for performance of required Surveillances. The ITS 3.3.4.1 Surveillance Requirements Note allows delayed entry into associated Conditions and Required Actions for up to 6 hours if an ATWS-RPT channel is placed in an inoperable status solely for performance of required Surveillances, provided the associated Function maintains ATWS-RPT trip capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for | 3.3.4.1 Surveillance Requirements Note | None | 4 |

## Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | an ATW-RPT channel placed in an inoperable status solely for performance of required Surveillances. | | | |
| 3.3.4.1 L.4 | CTS Table 3.2.5 specifies the "Trip Setting" for the ATWS-RPT High Reactor Dome Pressure Function. The Trip Setting of CTS Table 3.2.5 Function 1 has been modified to reflect the new Allowable Value as indicated in ITS SR 3.3.4.1.5.b. This changes the CTS by requiring the ATWS-RPT instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.6. | SR 3.3.4.1.5.b | Table 3.2.5 | 10 |
| 3.3.5.1 L.1 | CTS 3.2.B requires the ECCS Instrumentation Functions in Table 3.2.2 to be OPERABLE when irradiated fuel is in the reactor vessel and the reactor water temperature is above 212°F. ITS Table 3.3.5.1-1 requires the High Pressure Coolant Injection (HPCI) System Instrumentation and the Automatic Depressurization System (ADS) Instrumentation to be OPERABLE in MODE 1 and MODES 2 and 3 with reactor steam dome pressure is > 150 psig. This changes the CTS by deleting the requirement for the HPCI and ADS Instrumentation to be OPERABLE when the reactor water temperature is > 212°F but reactor steam dome pressure is ≤ 150 psig. | Table 3.3.5.1-1 Functions 3, 4, and 5 | 3.2.B | 2 |
| 3.3.5.1 L.2 | CTS Table 3.2.2 Function C.3 requires 12 channels of Low Pressure Core Cooling Pumps Discharge Pressure Interlock to be OPERABLE in each trip system. However, CTS Table 3.2.2 Note 4, which applies to each of these Functions, states that all instrument channels are shared by both trip systems. Thus, there are 12 total channels for this Function. ITS Table 3.3.5.1-1 Function 4.c requires two Core Spray Pump Discharge Pressure - High channels to be OPERABLE | Table 3.3.5.1-1 Function 4.c, 4.d, 5.c, and 5.d | Table 3.2.2 Function C.3, including Note 4 | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | for ADS Trip System A. ITS Table 3.3.5.1-1 Function 4.d requires four Low Pressure Coolant Injection Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System A. ITS Table 3.3.5.1-1 Function 5.c requires two Core Spray Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System B. ITS Table 3.3.5.1-1 Function 5.d requires four Low Pressure Coolant Injection Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System B. This changes the CTS by only requiring the low pressure ECCS pumps powered from the same electrical division to provide input into the associated (same electrical power division) ADS trip system. | | | |
| 3.3.5.1<br>L.3 | CTS Table 3.2.2 Note 3 provides the Actions for inoperable ECCS instrumentation channels. When one instrument channel is inoperable (per trip function), CTS Table 3.2.2 Note 3.(a) requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel per trip system is inoperable, CTS Table 3.2.2 Note 3.(b) requires the immediate placement of the appropriate channels in the tripped condition. CTS Table 3.2.8 Note 1 provides the Actions for inoperable required HPCI instrumentation channels. When one required instrument channel is inoperable, CTS Table 3.2.8 Note 1.a requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel is inoperable, CTS Table 3.2.8 Note 1.b requires the immediate placement of the appropriate channels or trip system in the tripped condition. ITS Table 3.3.5.1-1 Functions 1.a, 1.b, 2.a, 2.b, 3.a, and 3.b require entry into ITS 3.3.5.1 ACTION B, which requires placement of the channel in the tripped condition within 24 hours. In | 3.3.5.1 ACTIONS Note, 3.3.5.1 ACTIONS B, C, D, F, and G | Table 3.2.2 Note 3, Table 3.2.8 Note 1 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | addition, during operations in MODES 1, 2, and 3 (for Functions 1.a, 1.b, 2.a, and 2.b only), when its redundant feature ECCS initiation capability is inoperable, the supported feature(s) must be declared inoperable within 1 hour from discovery of loss of initiation capability for feature(s) in both divisions. In addition, for Functions 3.a and 3.b, when HPCI initiation capability is lost, the HPCI System must be declared inoperable within 1 hour from discovery of loss of HPCI initiation capability. ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 1.e, 2.c, 2.d, 2.e, and 3.c require entry into ITS 3.3.5.1 ACTION C, which requires restoration of the channel within 24 hours. In addition, during operations in MODES 1, 2, and 3 (for Functions 1.c, 1.d, 1.e, 2.c, 2.d, and 2.e), when its redundant feature ECCS initiation capability is inoperable, the supported feature(s) must be declared inoperable within 1 hour from discovery of loss of initiation capability for feature(s) in both divisions. ITS Table 3.3.5.1-1 Function 3.d requires entry into ITS 3.3.5.1 ACTION D, which requires either the placement of the channel in the tripped condition or the alignment of the HPCI pump suction to the suppression pool within 24 hours. In addition, when both channels are inoperable, the HPCI System must be declared inoperable within 1 hour from discovery of loss of HPCI initiation capability (if the HPCI pump suction is not aligned to the suppression pool). ITS Table 3.3.5.1-1 Functions 4.a and 5.a require entry into ITS 3.3.5.1 ACTION F, which requires placement of the channel in the tripped condition within 96 hours from discovery of the inoperable channel concurrent with HPCI or reactor core isolation cooling (RCIC) inoperable and within 8 days (if both HPCI and RCIC are OPERABLE). In addition the ADS valves must be declared inoperable within 1 hour from discovery of loss of ADS initiation | | | |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | capability in both trip systems. ITS Table 3.3.5.1-1 Functions 4.b, 4.c, 4.d, 5.b, 5.c, and 5.d require entry into ITS 3.3.5.1 ACTION G, which requires restoration of the channel to OPERABLE status within 96 hours from discovery of inoperable channel concurrent with HPCI or RCIC inoperable and within 8 days (if both HPCI and RCIC are OPERABLE). In addition the ADS valves must be declared inoperable within 1 hour from discovery of loss of ADS initiation capability in both trip systems. Finally, a Note has been added to the ACTIONS that states that separate Condition entry is allowed for each channel. This changes the CTS by extending the time allowed to take action for each individual channel, as long as ECCS initiation capability is maintained. Specifically, it extends the Completion Time for each individual Core Spray, LPCI, and HPCI instrument channel from 12 hours to 24 hours, it extends the time for each individual ADS channel from 12 hours to either 96 hours (if either HPCI or RCIC is inoperable) or 8 days (if both HPCI and RCIC are OPERABLE), and allows 1 hour to declare the associated ECCS subsystem inoperable when there is a loss of Function instead of requiring immediate action to place the appropriate channel in the trip condition when more than one channel is inoperable. | | | |
| 3.3.5.1<br>L.4 | If channels of the Core Spray and LPCI Reactor Low Pressure Permissive Bypass Timer (CTS Table 3.2.2 Function A.1.b.ii) or the ADS Functions (CTS Table 3.2.2 Functions C.1, C.2, or C.3) are inoperable and the requirements of CTS Table 3.2.2 Notes 3.(a) and 3.(b) cannot be met, then Table 3.2.2 Note 3.(c) requires Required Condition B to be taken (since this is the Required Condition listed in Table 3.2.2 for Functions A.1.b.ii, C.1, C.2, and C.3). CTS Table 3.2.2 Required Condition B requires reactor pressure to be ≤ 150 | 3.3.5.1<br>ACTION H | Table 3.2.2<br>Required Condition B | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | psig. Under the same condition in the ITS, ITS 3.3.5.1 ACTION H requires the associated supported feature(s) to be immediately declared inoperable. This changes the CTS by deleting the requirement to be ≤ 150 psig and replaces it with the requirement to declare the associated feature(s) inoperable. | | | |
| 3.3.5.1<br>L.5<br>BSI 1.d | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.2 and Table 3.2.8 specify the "Trip Setting" for the ECCS instrumentation Functions. The Trip Settings of CTS Table 3.2.2 Functions A.1.b.i and A.2 and Table 3.2.8 Function C.1 have been modified to reflect new Allowable Values as indicated for ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 2.c, 2.d, and 3.d. In addition, the Allowable Value for ITS Table 3.3.5.1-1 Function 3.d only specifies a single Allowable Value, which is applicable for both one tank and two tank operations. This changes the CTS by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8. | Table 3.3.5.1-1 Functions 1.c, 1.d, 2.c, 2.d, and 3.d | Table 3.2.2 Functions A.1.b.i and A.2, Table 3.2.8 Function C.1 | 10 |
| 3.3.5.2<br>L.1 | CTS Table 3.2.8 Note 1 provides the Actions for inoperable required instrumentation channels. When one required instrument channel is inoperable, CTS Table 3.2.8 Note 1.a requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel is inoperable, CTS Table 3.2.8 Note 1.b requires the immediate placement of the appropriate channels or trip system in the tripped condition. ITS Table 3.3.5.2-1 Function 1 (Reactor Vessel Water Level - Low Low) requires entry into ITS 3.3.5.2 ACTION B, which requires placement | 3.3.5.2 ACTIONS Note, 3.3.5.2 ACTIONS B, C, and D | Table 3.2.8 Note 1 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | of the channel in the tripped condition within 24 hours and, the RCIC System to be declared inoperable within 1 hour from discovery of loss of RCIC initiation capability. ITS Table 3.3.5.2-1 Function 2 (Reactor Vessel Water Level - High) requires entry into ITS 3.3.5.2 ACTION C, which requires restoration of the inoperable channel within 24 hours. ITS Table 3.3.5.2-1 Function 3 (Condensate Storage Tank Water Level - Low) requires entry into ITS 3.3.5.2 ACTION D, which requires either the placement of the inoperable channel to the tripped condition or the alignment of the RCIC pump suction to the suppression pool within 24 hours, and the RCIC System to be declared inoperable within 1 hour from discovery of loss of RCIC initiation capability (if the RCIC pump suction is not aligned to the suppression pool). In addition, a Note has been added to the ACTIONS that states that separate Condition entry is allowed for each channel. This changes the CTS by: a) extending the time allowed to take action for each individual Reactor Vessel Water Level - Low Low and Condensate Storage Tank Water Level - Low channel from 12 hours to 24 hours as long as RCIC initiation capability is maintained; b) extending the Completion Time for each individual Reactor Vessel Water Level - High channel from 12 hours to 24 hours; and c) allowing 1 hour to declare RCIC inoperable when the Reactor Vessel Water Level - Low Low Function or the Condensate Storage Tank Water Level - Low Function cannot maintain initiation capability, instead of requiring immediate action to place the appropriate channel in the trip condition when more than one channel is inoperable. | | | |
| 3.3.5.2<br>L.2 | CTS 3.5.D.3 states that the controls for the automatic transfer of the pump suction may be inoperable for 30 days, if the pump suction is aligned to the suppression pool. Under the same conditions in the | 3.3.5.2 Required Action D.2.2 | 3.5.D.3 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ITS, ITS 3.3.5.2 Required Action D.2.2 will allow this lineup for an unlimited period of time. This changes the CTS by allowing the RCIC pump suction to be aligned to the suppression pool indefinitely. | | | |
| 3.3.5.2<br>L.3<br>BSI 1.e | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.8 specifies the "Trip Setting" for the Condensate Storage Tank Level - Low for two tank and one tank operations. The Trip Settings of CTS Table 3.2.8 Function C.1 have been modified to reflect a new Allowable Value as indicated for ITS Table 3.3.5.2-1 Function 3. In addition, the Allowable Value for this Function only specifies a single Allowable Value, which is applicable for both one tank and two tank operations. This changes the CTS by requiring the RCIC instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8. | Table 3.3.5.2-1 Function 3 | Table 3.2.8 Function C.1 | 10 |
| 3.3.6.1<br>L.1 | CTS Table 3.2.1 Function 2.a requires the Low Reactor Water Level Function to be Applicable when the primary containment is required to be OPERABLE (i.e., MODES 1, 2, and 3 as described in DOC M.1). ITS Table 3.3.6.1-1 Function 6.b, the RHR SDC Isolation Reactor Vessel Water Level - Low Function, maintains the MODE 3 Applicability requirement, but does not maintain the MODES 1 and 2 Applicability requirements. This changes the CTS by deleting the requirement for the Reactor Vessel Water Level - Low Function for RHR SDC Isolation to be OPERABLE in MODES 1 and 2. | Table 3.3.6.1-1 Function 6.b | Table 3.2.1 Function 2.a | 2 |
| 3.3.6.1<br>L.2 | CTS Table 3.2.1 Note (2) provides the Actions for inoperable primary containment isolation instrumentation channels. When one instrument channel is inoperable (in one or more Functions), CTS | 3.3.6.1 ACTIONS Note 2, 3.3.6.1 ACTIONS A and B | Table 3.2.1 Note 2 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | Table 3.2.1 Note (2)(a) requires the inoperable channel(s) or trip system to be placed in trip within 12 hours. When more than one instrument channel is inoperable (for one or more Functions), CTS Table 3.2.1 Note (2)(b) requires the immediate placement of the appropriate channels in the tripped condition. ITS 3.3.6.1 ACTION A covers the condition of one or more required channels inoperable and requires channels that are common with the Reactor Protection System (RPS) channels (ITS Table 3.3.6.1-1 Functions 2.a, 2.b, 5.c, 6.b, 7.a, and 7.b are associated with RPS) to be placed in trip in 12 hours and all other channels to be placed in trip in 24 hours. ITS 3.3.6.1 ACTION B covers the condition of one or more Functions with primary containment isolation capability not maintained and requires the restoration of primary containment isolation capability within 1 hour. In addition, ITS 3.3.6.1 ACTIONS Note 2 allows separate Condition entry for each inoperable channel. This changes the CTS by: a) providing a specific Completion Time for each inoperable channel (i.e., from the time the channel became inoperable not when other channels for the same Function became inoperable); b) extending the time to restore inoperable channels not associated with RPS from 12 hours to 24 hours; c) allowing multiple channels in a Function to be inoperable (and allowing either 12 hours or 24 hours to restore the inoperable channel in the Function), provided primary containment isolation capability is not lost for the Function; and d) extending the time to restore primary containment isolation capability for a Function from immediately to 1 hour. | | | |
| 3.3.6.1<br>L.3 | CTS Table 3.2.1 Required Conditions (Note *) requires, in part, the associated penetration flow path to be isolated when the actions of Note (2) are not met. However, this action does not include a | 3.3.6.1 ACTIONS Note 1 | None | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | provision, similar to that allowed for CTS 3.7.D.2.a and b, that isolated valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.3.6.1 ACTIONS Note 1 allows any primary containment penetration flow path to be unisolated intermittently under administrative controls. This changes the CTS by allowing the containment isolation penetrations to be opened under administrative controls when primary containment isolation valves have been closed as a result of inoperable primary containment instrument channels. | | | |
| 3.3.6.1<br>L.4 | If CTS Table 3.2.1 Function 1.a, 1.b, or 1.c channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition A to be taken (since this is the Required Condition listed in Table 3.2.1 for Functions 1.a, 1.b, and 1.c). CTS Table 3.2.1 Required Condition A requires the Group 1 isolation valves to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 Required Action D.1 only requires isolation of the associated main steam lines. This changes the CTS by only requiring some of the Group 1 main steam isolation valves to be closed. | 3.3.6.1 Required Action D.1 | Table 3.2.1 Required Condition A | 4 |
| 3.3.6.1<br>L.5 | If CTS Table 3.2.1 Function 1.a, 1.b, or 1.c channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition A to be taken (since this is the Required Condition listed in Table 3.2.1 for Functions 1.a, 1.b, and 1.c). CTS Table 3.2.1 Required Condition A requires the Group 1 isolation valves to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS | 3.3.6.1 Required Actions D.2.1 and D.2.2 | Table 3.2.1 Required Condition A | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | 3.3.6.1 ACTION D provides an option to be in MODE 3 within 12 hours (Required Action D.2.1) and to be in MODE 4 within 36 hours (Required Action D.2.2) in lieu of closing the Group 1 valves. This changes the CTS by providing an alternate action to shut down the unit to MODE 4 in lieu of closing the Group 1 isolation valves. | | | |
| 3.3.6.1<br>L.6 | If CTS Table 3.2.1 Function 2.a channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition C to be taken (since this is the Required Condition listed in Table 3.2.1 for Function 2.a). CTS Table 3.2.1 Required Condition C requires the isolation valves of RHR Shutdown Cooling System to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 ACTION I requires the immediate initiation of action to restore the channel to OPERABLE status (ITS 3.3.6.1 Required Action I.1) or the immediate initiation of action to isolate the Residual Heat Removal (RHR) Shutdown Cooling System (ITS 3.3.6.1 Required Action I.2). This changes the CTS by providing an option to restore the inoperable channel to OPERABLE status instead of isolating the penetration. | 3.3.6.1 Required Action I.1 | Table 3.2.1 Required Condition C | 4 |
| 3.3.6.1<br>L.7 | CTS Table 4.1.1 specifies the requirements for the functional test of the High Drywell Press and Low Reactor Water Level Functions, and requires testing of the "Trip Channel" and "Alarm." ITS SR 3.3.6.1.2 requires the performance of a CHANNEL FUNCTIONAL TEST, but does not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm." | SR 3.3.6.1.2 | Table 4.1.1 (for High Drywell Pressure and Low Reactor Water Level) | 6 |
| 3.3.6.1 | CTS Table 4.1.2 provides the calibration method (i.e., pressure | None | Table 4.1.2 (for High | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.8 | standard) for the High Drywell Pressure and Low Reactor Water Level channels. ITS 3.3.6.1 does not include this information in the associated SRs. This changes the CTS by deleting the calibration method from the CTS. | | Drywell Pressure and Low Reactor Water Level) | |
| 3.3.6.1<br>L.9<br>BSI 1.g (in part) | *** SOME ITEMS ARE BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS Table 3.2.1 specifies the "Trip Settings" for the primary containment isolation instrumentation. The "Trip Settings" of CTS Table 3.2.1 Functions 1.b, 1.d, 5.a, 5.c, and 6.a have been modified to reflect new Allowable Values as indicated in ITS Table 3.3.6.1-1 Functions 1.b, 1.c, 4.a, 4.b, and 6.a. This changes the CTS by requiring the primary containment isolation instrumentation Functions to be set consistent with the new "Allowable Value." The change in the term "Trip Settings" to "Allowable Value" is discussed in DOC A.13.<br>ITS Functions 4.a and 6.a are BSIs. | Table 3.3.6.1-1 Functions 1.b, 1.c, 4.a, 4.b, and 6.a | Table 3.2.1 Functions 1.b, 1.d, 5.a, 5.c, and 6.a | 10 |
| 3.3.6.2<br>L.1 | CTS Table 3.2.4 Note (2) (b) covers the condition when more than one channel associated with any secondary containment isolation Function is inoperable in the same trip system. For Functions 1 and 2, it requires the unit to place the associated channels or Trip System in trip. For Functions 3 and 4, it requires (via Required Conditions A and B) immediate action (using normal operating procedures) to isolate the reactor building ventilation system and to have the standby gas treatment system operating or to place the unit in a condition where the secondary containment is not required. ITS 3.3.6.2 ACTION B only requires entry when one or more Functions do not have isolation capability and it requires the restoration of isolation | 3.3.6.2 ACTIONS B and C | Table 3.2.4 Note (2) (b) | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | capability within 1 hour. If this cannot be met, ITS 3.3.6.2 ACTION C requires the isolation of the associated penetration flow path or the declaration that the secondary containment isolation valves are inoperable and either requires the placement of the associated SGT subsystem in operation or the declaration that the SGT subsystem is inoperable. This changes the CTS in several ways: (a) it only requires entry when secondary containment isolation capability is lost in both trip systems; (b) it allows 1 hour to restore isolation capability; (c) it allows an additional hour to perform the isolation function if isolation capability cannot be restored within 1 hour; and (d) instead of providing the option to establish conditions where secondary containment is not required, an option to declare inoperable the associated secondary containment isolation valves or SGT subsystem is allowed. | | | |
| 3.3.6.2 L.2 | CTS Table 4.1.1 specifies the requirements for the functional test of the High Drywell Pressure Function, and requires testing of the "Trip Channel" and "Alarm." ITS SR 3.3.6.2.2 requires the performance of a CHANNEL FUNCTIONAL TEST, but does not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm." | SR 3.3.6.2.2 | Table 4.1.1 (for High Drywell Pressure) | 6 |
| 3.3.6.2 L.3 | CTS Table 4.1.2 provides the calibration method (i.e., pressure standard) for the High Drywell Pressure Function. ITS SR 3.3.6.2.4 requires performance of a CHANNEL CALIBRATION, but does not include this calibration method information. This changes the CTS by deleting the calibration method from the CTS. | None | Table 4.1.2 (for High Drywell Pressure) | 6 |
| 3.3.6.3 L.1 | CTS Table 3.2.7 Required Condition A specifies actions for one inoperable trip system and allows 72 hours to restore the trip system | 3.3.6.3 ACTIONS A and B | Table 3.2.7 Required Conditions | 3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | to OPERABLE status. If this cannot be met the unit must reduce reactor pressure to less than 110 psig and reactor water temperature to less than 345°F within 24 hours. CTS Table 3.2.7 Required Condition B specifies actions for two inoperable trip systems and requires reactor pressure to be reduced to less than 110 psig and reactor water temperature to less than 345°F within 24 hours. ITS 3.3.6.3 ACTION A specifies actions for one or more channels inoperable in one or more Functions, and requires the declaration that the associated LLS valve is inoperable within 1 hour from discovery of loss of LLS valve initiation capability in both trip systems (Required Action A.1) and the restoration of all channels to OPERABLE status within 72 hours (Required Action A.2). If either of these Required Actions is not met, ITS 3.3.6.3 ACTION B requires the immediate declaration that the LLS valve(s) are inoperable. Once a single LLS valve is declared inoperable, ITS 3.6.1.5 will allow 14 days to restore the valve. Furthermore, if the LLS valve is not restored, or if more than one LLS valve is declared inoperable, ITS 3.6.1.5 will allow 12 hours to be in MODE 3 and 36 hours to be in MODE 4. This changes the CTS by: (a) allowing 1 hour to restore LLS valve automatic trip capability when both trip systems associated with a LLS valve is inoperable prior to requiring the LLS valve to be declared inoperable; b) allows up to 14 days to restore a single LLS valve to OPERABLE status (after entering the ACTIONS of ITS 3.6.1.5; and c) allows 36 hours to exit the Applicability once a unit shutdown is required in lieu of the current 24 hours. The change to the Applicability is discussed in DOC M.1. | | A and B | |
| 3.3.6.3 | CTS Table 3.2.7 Function 2 specifies the Low-Low Set Pressure | Table 3.3.6.3-1 | Table 3.2.7 Function | 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.2 | opening and closing Trip Settings for the LLS valves. A pressure range (± 14 psig) is provided for both the opening and closing pressures. ITS Table 3.3.6.3-1 Function 2 only specifies the upper limit for the opening and closing pressure Allowable Values. The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.6. This changes the CTS by deleting the lower limit for the Low-Low Set Pressure opening and closing Trip Settings. | Function 2 | 2 | |
| 3.3.6.3<br>L.3 | ITS 3.3.6.3 Note 2 to the Surveillance Requirements states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains LLS initiation capability. This allowance is not specified in the CTS. This changes the CTS by adding an allowance to delay entry into associated Conditions and Required Actions by to 6 hours provided the associated Function maintains LLS initiation capability. | 3.3.6.3 Surveillance Requirements Note 2 | None | 4 |
| 3.3.7.1<br>L.1 | When a Control Room Radiation channel is inoperable, CTS Table 3.2.9 Required Condition A allows 1 hour to initiate and maintain operation of the CREF subsystem in the pressurization mode of operation or Required Condition B requires the reactor water temperature to be reduced to below 212˚F within 24 hours. When one or two channels are inoperable, ITS 3.3.7.1 ACTION A requires within 1 hour either the declaration that the associated CREF subsystem is inoperable or to place the associated CREF subsystem in the pressurization mode of operation. This changes the CTS by allowing the associated CREF subsystem to be declared inoperable within 1 hour, and subsequently take the Actions of ITS 3.7.4 in lieu of shutting down the unit in 24 hours. | 3.3.7.1 ACTION A | Table 3.2.9 Required Conditions A and B | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| 3.3.8.1<br>L.1 | CTS Table 3.2.6 Note (1) provides the Action for inoperable required LOP instrumentation channels. When a channel is inoperable, the appropriate channels or systems must be placed in the tripped condition or (via Required Condition A) the plant must be in Cold Shutdown within 24 hours. ITS 3.3.8.1 ACTION A covers the condition when one or more channels are inoperable and requires the channel to be placed in trip within 1 hour. If this ACTION is not met, ITS 3.3.8.1 ACTION B requires the associated EDG to be declared inoperable immediately. This changes the CTS by providing an explicit time (1 hour) to place a channel in the tripped condition and allows the associated EDG to be declared inoperable instead of requiring the unit to be in Cold Shutdown within 24 hours. | 3.3.8.1 ACTIONS A and B | Table 3.2.6 Note (1), including Required Condition A | 3 |
| 3.3.8.1<br>L.2 | ITS 3.3.8.1 Surveillance Requirements Note 2 states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 2 hours provided the associated Function maintains EDG initiation capability. CTS Table 4.2.1 and CTS Table 3.2.6 do not provide this allowance. This changes the CTS by providing the 2 hour allowance to perform Surveillances. | 3.3.8.1 Surveillance Requirements Note 2 | None | 1 |
| 3.3.8.2<br>L.1 | CTS 3.1.C.3 covers the condition when both RPS electric power monitoring channels for one or both RPS buses are inoperable, and specifies the removal of the associated power supply(s) within 30 minutes. ITS 3.3.8.2 ACTION B covers the same condition, and allows 1 hour to remove the associated power supply(s) from service. This changes the CTS by extending the time to remove the associated power supply(s) from service when both assemblies associated with one or both inservice power supplies are inoperable. | 3.3.8.2 ACTION B | 3.1.C.3 | 3 |
| 3.4.2 | CTS 4.6.G states, in part, whenever there is recirculation flow with the | SR 3.4.2.1 Note 1 | 4.6.G | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.1 | reactor operating, jet pumps shall be demonstrated OPERABLE daily. ITS SR 3.4.2.1 Note 1 states the jet pump OPERABILITY Surveillance does not have to be performed until 4 hours after the associated recirculation loop is in operation. This changes the CTS by allowing a short time after the recirculation loop is placed in operation to evaluate whether or not the jet pumps are OPERABLE | | | |
| 3.4.2<br>L.2 | CTS 4.6.G requires the jet pumps OPERABILITY Surveillance to be performed in the "Run" mode. ITS SR 3.4.2.1 requires the same verification to be performed however, its performance may be delayed until 24 hours after > 25% RTP, as described in Note 2. This changes the CTS by delaying the performance of the Surveillance until 24 hours after exceeding a THERMAL POWER of 25% RTP. | SR 3.4.2.1 Note 2 | 4.6.G | 7 |
| 3.4.2<br>L.3 | CTS 4.6.G.1, in part, requires the jet pump OPERABILITY Surveillance to be performed daily and following any unexplained change in core flow, jet pump loop flow, recirculation loop flow, or core plate differential pressure. ITS SR 3.4.2.1 only requires the Surveillance to be performed every 24 hours. This changes the CTS by deleting the requirement to perform the jet pump OPERABILITY Surveillance following the above changes in unit conditions. | SR 3.4.2.1 | 4.6.G.1 | 7 |
| 3.4.3<br>L.1 | CTS 3.6.E.1 states, in part, that seven S/RVs shall be OPERABLE. It also states that 8 S/RVs shall be set at ≤ 1120 psig. ITS SR 3.4.3.1 states that the required S/RVs shall be set to 1109 ± 33.2 psig. In addition, this Surveillances states "Following testing, lift settings shall be within ± 1%." This changes the CTS by allowing the S/RVs to be within + 3% of the nominal setpoint of 1109 during operation and only after testing are the S/RVs required to be set to + 1% of 1109 psig (i.e., 1120 psig). The addition of the minimum allowed setpoint is discussed in DOC M.2. | SR 3.4.3.1 | 3.6.E.1 | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| 3.4.3 L.2 | CTS 3.6.E does not provide any specific time for restoring one or two required inoperable S/RVs; an immediate plant shutdown is required by CTS 3.6.E.2. ITS 3.4.3 ACTION A covers the condition when one or two required S/RVs are inoperable and allows 14 days to restore the S/RVs to OPERABLE status. This changes the CTS by adding an allowance to operate for up to 14 days when one or two required S/RVs are inoperable. | 3.4.3 ACTION A | 3.6.E.2 | 4 |
| 3.4.3 L.3 | CTS 3.6.E.2 states that if Specification 3.6.E.1 is not met, initiate an orderly shutdown and have reactor coolant pressure and temperature reduced to 110 psig or less and 345°F or less. ITS 3.4.3 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and extends the time to be outside of the Applicability of the Specification from 24 hours to 36 hours. The change to be in MODE 4 in lieu of the current requirement to reduce reactor coolant pressure to 110 psig or less and reactor coolant temperature to 345°F or less is discussed in DOC M.1. | 3.4.3 ACTION B | 3.6.E.2 | 3 |
| 3.4.6 L.1 | CTS 4.6.C.1.(a) requires a reactor coolant sample be taken and analyzed for radioactive iodines of I-131 through I-135 every 96 hours during power operation. ITS SR 3.4.6.1 requires verifying DOSE EQUIVALENT I-131 specific activity every 7 days when in MODE 1. This changes the CTS by extending the Surveillance Frequency from 96 hours to 7 days and eliminates the requirement to perform the Surveillance in MODE 2 above 1% Rated Thermal Power (RTP). | SR 3.4.6.1 | 4.6.C.1.(a) | 7 |
| 3.4.6 L.2 | CTS 3.6.C does not specify Applicability requirements. The Applicability of MODES 1, 2, and 3 is inferred in the CTS 3.6.C.4 Action to place the plant in cold shutdown when the Specification is not met. ITS 3.4.6 Applicability is MODE 1, and MODES 2 and 3 with | 3.4.6 Applicability | 3.6.C.4 | 2 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | any main steam line not isolated. In addition, as a result of this change, ITS 3.4.6 Required Action B.2.1 allows all main steam lines to be isolated in lieu of a shutdown to MODE 4 (i.e., cold shutdown). This changes the CTS by specifying that MODES 2 and 3 are applicable only when the main steam lines are not isolated. | | | |
| 3.4.6<br>L.3 | CTS 4.6.C.1.(c) requires a reactor coolant sample be taken and analyzed for radioactive iodines when the main condenser offgas system pretreatment monitors indicate an increase in radioactive gaseous effluents of 25 percent or 5000 µCi/sec, whichever is greater, during steady state reactor operation. CTS 4.6.C.1.(d) requires an isotopic analysis of reactor coolant samples be made at least once per month. CTS 4.6.C.1.(e) requires a reactor coolant sample be taken within 24 hours of any reactor startup and analyzed for radioactive iodines I-131 through I-135 whenever the steady state radioiodine concentration of prior operation is greater than 1 percent but less than 10 percent of Specification 3.6.C.1.(a). CTS 4.6.C.1.(f) requires a reactor coolant sample be taken daily and prior to any reactor startup and analyzed for radioactive iodines I-131 through I-135 whenever the steady state radioiodine concentration of prior operation is greater than 10 percent of Specification 3.6.C.1.(a). These Surveillance Requirements are not retained in the ITS. This changes the CTS by deleting Surveillance Requirements to sample and analyze for radioactive iodines that are event based and a Surveillance that requires a complete isotopic analysis monthly. | None | 4.6.C.1.(c),<br>4.6.C.1.(d),<br>4.6.C.1.(e),<br>4.6.C.1.(f) | 5 |
| 3.4.6<br>L.4 | CTS 3.6.C.4 requires an orderly shutdown be initiated and the reactor be in cold shutdown condition within 24 hours if the iodine concentration limit is not met. ITS 3.4.6 ACTION A allows 48 hours to restore the iodine concentration to within limits (ITS 3.4.6 Required | 3.4.6 ACTION A | 3.6.C.4 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | Action A.2) prior to requiring a unit shutdown, provided the iodine concentration is ≤ 4.0 μCi/gm. However, during this 48 hour period, a determination of DOSE EQUIVALENT I-131 is required every 4 hours (ITS 3.4.6 Required Action A.1). In addition, during this 48-hour period, changes in MODES or other specified conditions in the Applicability are allowed (ITS 3.4.6 Required Action A Note). This changes the CTS by allowing 48 hours, under certain conditions, to restore iodine concentration to within limits prior to requiring a unit shutdown. The change also allows changes in MODES or other specified condition in the Applicability during this 48 hour time. | | | |
| 3.4.6<br>L.5 | CTS 3.6.C.4 requires an orderly shutdown be initiated and the reactor be in cold shutdown condition within 24 hours if the iodine concentration limit is not met. ITS 3.4.6 Required Actions B.2.2.1 and B.2.2.2 require the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours, respectively. This changes the CTS by adding a requirement to be in MODE 3 in 12 hours and by extending the time allowed to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours. | 3.4.6 Required Actions B.2.2.1 and B.2.2.2 | 3.6.C.4 | 3 |
| 3.4.9<br>L.1 | CTS 3.6.A.2 states that the pump in an idle recirculation loop shall not be started unless the temperature of the coolant within the idle recirculation loop is within 50°F of the reactor coolant temperature.<br>ITS LCO 3.4.9 and ITS SR 3.4.9.3 includes the same requirement, however a Note has been included in ITS SR 3.4.9.3 that states the Surveillance is only required to be met in MODES 1, 2, 3, and 4 during recirculation pump startup. This changes the CTS by excluding the idle loop temperature requirement during MODE 5 and when fuel is not in the reactor. | 3.6.A.2 | SR 3.4.9.3 Note | 2 |
| 3.4.9 | CTS 4.6.A requires a verification of the heatup and cooldown rate | SR 3.4.9.1 | 4.6.A, 4.6.B.1 | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.2 | every 15 minutes. CTS 4.6.B.1 requires a verification that the P/T limits are within limits every 15 minutes during inservice hydrostatic or leak testing. ITS SR 3.4.9.1 requires the RCS pressure, RCS temperature, and RCS heatup and cooldown rates to be within the applicable limits every 30 minutes. This changes the CTS by extending the Surveillance Frequency from every 15 minutes to every 30 minutes. | | | |
| 3.4.9<br>L.3 | CTS 3.6.B.4 states that the reactor vessel head bolting studs shall not be under tension unless the temperature of the vessel head flange and the head are ≥ 70°F. CTS 4.6.B.4 states that when the reactor vessel head studs are under tension and the reactor is in the Cold Shutdown Condition, the reactor vessel shell flange temperature shall be permanently recorded. ITS SR 3.4.9.4, SR 3.4.9.5, and SR 3.4.9.6 include the requirement to verify the same limit specified in CTS 3.6.B.4 (reactor vessel flange and head flange temperatures are ≥ 70°F). ITS SR 3.4.9.4 requires a verification that the reactor vessel flange and head flange temperatures are within limits every 30 minutes when tensioning the reactor vessel head bolting studs. ITS SR 3.4.9.5 requires the same verification every 30 minutes, however the verification is not required to be performed until 30 minutes after RCS temperature is ≤ 80°F in MODE 4. ITS SR 3.4.9.6 requires the same verification every 12 hours, however the verification is not required to be performed until 12 hours after RCS temperature is ≤ 100°F in MODE 4. This changes the CTS by deleting the requirement to permanently record the reactor vessel shell flange temperature at all times when the reactor vessel head studs are under tension and | SR 3.4.9.4, SR 3.4.9.5, SR 3.4.9.6 | 4.6.B.4 | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | the reactor is in MODE 4, and includes a requirement to verify the limits are met at periodic Frequencies. | | | |
| 3.5.1 L.1 | CTS 3.5.A.3.c covers the inoperabilities associated with one low pressure pump or valve associated with CS or LPCI to be inoperable with an ADS valve inoperable. ITS 3.5.1 ACTION K also allows an ADS valve to be inoperable with the same inoperabilities associated with CS and LPCI specified in CTS 3.5.A.3.c (ITS 3.5.1 ACTION A and ACTION B), however it also covers the inoperability of one entire LPCI subsystem due to both pumps being inoperable (ITS 3.5.1 ACTION B (first Condition)) and one LPCI pump in each subsystem (ITS 3.5.1 ACTION C). This changes the CTS by allowing more ECCS components to be inoperable when an ADS valve is inoperable. | 3.5.1 ACTION K | 3.5.A.3.c | 4 |
| 3.5.1 L.2 | CTS 3.5.A.3.f covers the inoperability associated with both LPCI injection paths, and allows 72 hours to restore a LPCI injection path to OPERABLE status. ITS 3.5.1 ACTION D covers the condition of two inoperable LPCI subsystems. This changes the CTS by allowing 3 or 4 LPCI pumps (instead of two injection paths) to be inoperable for up to 72 hours. | 3.5.1 ACTION D | 3.5.A.3.f | 4 |
| 3.5.1 L.3 | If the requirements or conditions of CTS 3.5.A.1, 3.5.A.2, or 3.5.A.3 cannot be met, CTS 3.5.A.4 requires an orderly shutdown of the reactor to be initiated and the reactor shall be placed in a condition in which the affected equipment is not required to be OPERABLE within 24 hours. ITS 3.5.1 ACTION E provides the shutdown actions for when the low pressure injection/spray systems are not restored to OPERABLE status in the required time and requires the reactor to be in MODE 3 in 12 hours and MODE 4 in 36 hours. ITS 3.5.1 ACTION L provides the shutdown action for when the high pressure ECCS | 3.5.1 ACTIONS E, L, and M | 3.5.A.4 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | components (HPCI and ADS) are not restored to OPERABLE status within the required time and requires the reactor to be in MODE 3 in 12 hours and to reduce reactor steam dome pressure to ≤ 150 psig within 36 hours. ITS 3.5.1 ACTION M covers the condition when two or more low pressure ECCS injection/spray subsystems are inoperable for reasons other than Condition C, D, or F or when HPCI and ADS are concurrently inoperable, and requires the unit to enter LCO 3.0.3 immediately. LCO 3.0.3 requires initiation of action within 1 hour be in MODE 2 in 7 hours, be in MODE 3 in 13 hours, and either be in MODE 4 or reduce reactor steam dome pressure to ≤ 150 psig (as applicable) in 37 hours. This changes the CTS by adding a requirement to be in MODE 2 in 7 hours (for inoperabilities specified in Condition M only), to be in MODE 3 in 12 hours (or 13 hours for inoperabilities specified in Condition M only). and by extending the time the unit must be out of the Applicability of the Specification from 24 hours to 36 hours or 37 hours (for inoperabilities specified in Condition M only). | | | |
| 3.5.1 L.4 | CTS 4.5.A.4 requires the performance of a simulated automatic actuation test of all ECCS subsystems. ITS SR 3.5.1.10 requires the verification each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal. ITS SR 3.5.1.11 requires the verification each ADS valve actuates on an actual or simulated automatic initiation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. | SR 3.5.1.10, SR 3.5.1.11 | 4.5.A.4 | 6 |
| 3.5.1 L.5 | CTS 3.5.A.3 does not cover the condition of HPCI inoperable concurrent with any low pressure ECCS subsystems inoperable. Thus, CTS 3.5.A.4 requires a unit shutdown when in this condition. | 3.5.1 ACTION I | 3.5.A.4 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ITS 3.5.1 ACTION I covers the condition of HPCI inoperable concurrent with the inoperabilities in ITS 3.5.1 ACTION A, B, or C (one LPCI pump inoperable, one LPCI subsystem inoperable for reasons other than Condition A, one Core Spray subsystem inoperable, or one LPCI pump inoperable in each subsystem) and requires either the HPCI System or the low pressure ECCS injection/spray subsystem(s) to be restored to OPERABLE status within 72 hours. This changes the CTS by allowing low pressure ECCS components be inoperable for a short period of time concurrent with the HPCI System being inoperable prior to requiring a unit shutdown. | | | |
| 3.5.1<br>L.6 | ITS LCO 3.5.1 includes a Note that states the low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the Residual Heat Removal (RHR) shutdown cooling supply isolation interlock in MODE 3, if capable of being manually realigned and not otherwise inoperable. CTS 3.5.A does not include this explicit allowance. This changes the CTS by adding this explicit allowance. | LCO 3.5.1 Note | None | 1 |
| 3.5.2<br>L.1 | CTS 3.5.E.1 and 3.5.E.2 require low pressure ECCS subsystems to be OPERABLE during OPDRVs. While no actions are specified if a low pressure ECCS subsystem becomes inoperable during OPDRVS, it is implicit that OPDRVs would have to be suspended. ITS 3.5.2 ACTION A allows one required low pressure ECCS subsystem to be inoperable for up to 4 hours (i.e., it requires restoration of the inoperable low pressure ECCS subsystem within 4 hours), prior to requiring OPDRVs to be suspended. This changes the CTS by allowing operation to continue for up to 4 hours with an inoperable low | 3.5.2 ACTION A | 3.5.E.1, 3.5.E.2 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | pressure ECCS subsystem prior to requiring the suspension of OPDRVs. | | | |
| 3.5.2<br>L.2 | CTS 3.5.E.1, in part, requires all containment cooling subsystems to be OPERABLE during OPDRVs except as allowed by CTS 3.5.E.2. When the vessel head is removed, the spent fuel pool gates are open, and the fuel pool water level is maintained at a level of greater than or equal to 33 ft, CTS 3.5.E.2 allows the suppression chamber water level to be drained, if no more than one control rod drive housing or instrument thimble is opened. Thus, CTS 3.5.E.2 implies that when these conditions are not met in MODE 5, all containment cooling subsystems must be OPERABLE. The ITS does not require containment cooling subsystems to be OPERABLE in MODES other than MODES 1, 2, and 3. This changes the CTS by eliminating all requirements to have any containment cooling subsystems OPERABLE in these conditions. | None | 3.5.E.2 | 1 |
| 3.5.2<br>L.3 | CTS 3.5.E.1, in part, requires all low pressure ECCS subsystems to be OPERABLE during OPDRVs except as allowed in CTS 3.5.E.2. When irradiated fuel is in the vessel and the vessel head is removed (i.e., MODE 5), the spent fuel pool gates are open, and the fuel pool water level is maintained at a level of greater than or equal to 33 ft, CTS 3.5.E.2 allows the suppression chamber water level to be drained, provided that no more than one control rod drive housing or instrument thimble is opened. This effectively provides an allowance that all low pressure ECCS subsystems are allowed to be inoperable during these two specific types of OPDRVs (one control rod drive housing or instrument thimble is opened). ITS 3.5.2 will allow all low pressure ECCS subsystems to be inoperable for any type of OPDRV, provided the same requirements concerning spent fuel pool gates and | 3.5.2 Applicability | 3.5.E.2 | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | water level are met. This changes the CTS by allowing any type of OPDRV during MODE 5 operations, not just the two listed in CTS 3.5.E.2, provided the spent fuel gates are removed and water level is within the limit. | | | |
| 3.5.2 L.4 | CTS 3.7.A.1.e, requires the suppression pool water level to be within limit and CTS 4.7.A.1.e requires the verification that the suppression pool water level is within limit. CTS 3.7.A.1.e also only allows 2 hours to restore the suppression pool level to within limits before requiring the suspension of all OPDRVS. ITS SR 3.5.2.1.a requires the same verification, however an option is provided to allow the condensate storage tank(s) water level to be met instead of the suppression pool level. However, only one required ECCS injection/spray subsystem may take credit for this option during OPDRVs. If the suppression pool level is not within limit, but with the condensate storage tank water level within the prescribed limits, ITS 3.5.2 ACTION A must be entered and 4 hours is allowed prior to requiring the initiation of action to suspend OPDRVS (ITS 3.5.2 ACTION B). This changes the CTS by providing an option to allow the condensate storage tank(s) to be the water source for the required ECCS subsystems. Changes to the Required Actions are discussed in DOC L.5. | SR 3.5.2.1.a | 3.7.A.1.e | 1 |
| 3.5.2 L.5 | CTS 3.7.A.1.e requires the suppression pool water level to be within limit and CTS 4.7.A.1.e requires the verification that the suppression pool water level is within limit. CTS 3.7.A.1.e also only allows 2 hours to restore the suppression pool level to within limits before requiring the suspension of all OPDRVS. ITS SR 3.5.2.1.a requires the same verification, however an option is provided to allow the condensate storage tank(s) water level to be met instead of the suppression pool level. However, only one required ECCS injection/spray subsystem | 3.5.2 ACTION A | 3.7.A.1.e | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | may take credit for this option during OPDRVs. If the suppression pool level is not within limit, but with condensate storage tank water level within prescribed limits, ITS 3.5.2 ACTION A must be entered and 4 hours is allowed prior to requiring the initiation of action to suspend OPDRVS (ITS 3.5.2 ACTION B). This changes the CTS by extending the time to stop OPDRVs from 2 hours to 4 hours as long as the condensate storage tank water level is within the prescribed limits. | | | |
| 3.5.2<br>L.6 | ITS LCO 3.5.2 includes a Note that states one low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. CTS 3.5.E does not include this explicit allowance. This changes the CTS by adding this explicit allowance. | LCO 3.5.2 Note | None | 1 |
| 3.5.2<br>L.7 | CTS 3.7.A.1.e requires the suppression pool water level to be $\geq$ -4.0 and $\leq$ + 3.0 inches. ITS SR 3.5.2.1.a requires the suppression pool water level to be $\geq$ - 3 ft. This changes the CTS by modifying the lower limit from $\geq$ - 4.0 inches to $\geq$ - 3 ft. The change to the upper suppression pool limit is discussed in DOC A.3. | SR 3.5.2.1.a | 3.7.A.1.e | 1 |
| 3.5.3<br>L.1 | If the RCIC System is not restored within 14 days, or the RCIC System and HPCI System are concurrently inoperable, CTS 3.5.D.4 requires an orderly shutdown of the reactor to be initiated and the reactor shall be placed in a condition in which the affected equipment is not required to be OPERABLE within 24 hours. ITS 3.5.3 ACTION B requires the reactor to be in MODE 3 in 12 hours and to reduce reactor steam dome pressure to $\leq$ 150 psig within 36 hours. This changes the CTS by adding a requirement to be in MODE 3 in 12 hours and by extending the time the unit must be out of the | 3.5.3 ACTION B | 3.5.D.4 | 3 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | Applicability of the Specification from 24 hours to 36 hours. | | | |
| 3.5.3 L.2 | CTS 4.5.D.2 requires the performance of a simulated automatic actuation test of the RCIC System. ITS SR 3.5.3.4 requires the verification that the RCIC System actuates on an actual or simulated automatic initiation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test. | SR 3.5.3.4 | 4.5.D.2 | 6 |
| 3.6.1.1 L.1 | CTS 4.7.A.2.d requires a visual inspection of the interior surfaces of the drywell once each operating cycle for evidence of deterioration. CTS 4.7.A.1.c requires visual inspection of the accessible portions of the suppression chamber interior each refueling interval. ITS SR 3.6.1.1.1 requires visual examinations in accordance with the Primary Containment Leakage Rate Testing program. This changes the CTS by reducing the Frequency of the visual inspections (examination). | SR 3.6.1.1.1 | 4.7.A.2.d, 4.7.A.1.c | 7 |
| 3.6.1.2 L.1 | CTS 3.7.A.2.c states that with the primary containment air lock inoperable, "maintain" at least one air lock door closed. ITS 3.6.1.2 Required Action C.2 requires a verification that within "1 hour" an air lock door is closed. This changes the CTS by allowing 1 hour to close the air lock door, in lieu of the current immediate time (i.e., maintain). | 3.6.1.2 Required Action C.2 | 3.7.A.2.c | 3 |
| 3.6.1.2 L.2 | CTS 3.7.A.2.c states that with an air lock inoperable (for any reason), maintain at least one air lock door closed and restore the air lock to OPERABLE status within 24 hours or the unit must be shutdown. ITS 3.6.1.2 provides separate ACTIONS for different inoperabilities of the air lock. With an airlock inoperable due to a single inoperable door, ITS 3.6.1.2 ACTION A allows operation for an unlimited amount of time, provided the OPERABLE air lock door is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that the OPERABLE air lock door remains locked closed. For air | 3.6.1.2 ACTIONS Note 1, ACTIONS A and B, Condition C | 3.7.A.2.c | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | lock doors in high radiation areas or areas with limited access due to inerting, this 31 day verification can be performed by administrative means. In addition, the ACTION allows containment entry and exit for up to 7 days under administrative controls. With an air lock interlock mechanism inoperable, ITS 3.6.1.2 ACTION B allows operation for an unlimited amount of time, provided an OPERABLE door in the air lock is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that an OPERABLE air lock door in the air lock remains locked closed. For air lock doors in high radiation areas or areas with limited access due to inerting, this 31 day verification can be performed by administrative means. In addition, containment entry and exit through the air lock is permissible (i.e., the closed and locked OPERABLE door can be opened) under the control of a dedicated individual. Finally, due to these new ACTIONS, ITS 3.6.1.2 ACTION C, which has similar actions as CTS 3.7.A.2.c (as modified by DOC L.1), only applies to an air lock that is inoperable for reasons other than an inoperable door or an inoperable interlock mechanism. For both of these new ACTIONS as well as ACTION C, as stated in ITS ACTIONS Note 1, entry and exit (i.e., the closed and locked OPERABLE air lock doors can be opened) is also permissible to perform repairs on the affected air lock components. This changes the CTS by allowing operation for an unlimited amount of time, with certain restrictions, for air locks that are inoperable due to an inoperable door or interlock mechanism. | | | |
| 3.6.1.3<br>L.1 | CTS 3.7.D.3.b requires the associated penetration flow path isolated when a primary containment purge or vent valve is not within purge and vent valve leakage limits. However, this action does not include a provision, similar to that allowed for CTS 3.7.D.2.a and b, that isolated | 3.6.1.3 ACTIONS Note 1 | None | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.6.1.3 ACTIONS Note 1 allows any primary containment penetration flow path, including the containment purge and vent valve flow paths, isolated due to a leakage limit not being met, to be unisolated intermittently under administrative controls. This changes the CTS by allowing the containment purge and vent valve penetrations to be opened under administrative controls when containment purge and vent valve leakage is not within limit. | | | |
| 3.6.1.3 L.2 | CTS 4.7.D.1.a requires the performance of a simulated automatic initiation test of all power operated and automatic initiated PCIVs. ITS SR 3.6.1.3.7 requires the verification each automatic PCIV actuates to the isolation position on an actual or simulated automatic isolation signal. This changes the CTS by explicitly allowing the use of an actual signal for the test. | SR 3.6.1.3.7 | 4.7.D.1.a | 6 |
| 3.6.1.3 L.3 | CTS 3.7.D.2.a covers the condition of one or more penetration flow paths with one PCIV inoperable and allows reactor operation in the "run mode" to continue for a short period of time. CTS 3.7.D.2.b covers the condition of one or more penetration flow paths with two PCIVs inoperable and allows reactor operation in the "run mode" to continue for a short period of time. CTS 3.7.D.3.b covers the condition of one or more penetration flow paths with one or more containment purge and vent valves not within purge and vent valve leakage limits and allows reactor operation in the "run mode" to continue for a short period of time. The "run mode" is when the reactor mode switch is in the "run" position. CTS 3.7.D.1 is applicable in the reactor "power operating" conditions, which include either the mode switch in the "run" or "start-up" position when power is > 1% | 3.6.1.3 ACTIONS A, B, and C | 3.7.D.2.a, 3.7.D.2.b, 3.7.D.3.b | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | RTP (CTS 1.0.O). Therefore, if the unit is not in the "run mode" when a PCIV becomes inoperable, then CTS 3.7.D.4, which requires a unit shutdown to cold shutdown within 24 hours, would apply. The CTS does not allow unit operation to continue when the mode switch is in the "start-up" position using the allowances provided in CTS 3.7.D.2.a, 3.7.D.2.b, or 3.7.D.3.b. ITS 3.6.1.3 ACTIONS A, B, and C cover similar conditions as in CTS 3.7.D.2.a, 3.7.D.2.b, and 3.7.D.3.b, and allows continued operation (similar to that allowed by CTS 3.7.D.2.a, 3.7.D.2.b, and 3.7.D.3.b as modified by applicable ITS 3.6.1.3 DOCs) regardless of the initial position of the reactor mode switch. This changes the CTS by allowing operation to continue with inoperable PCIVs in any MODE, not just MODE 1 (i.e., the "run mode"). | | | |
| 3.6.1.3 L.4 | CTS 3.7.D.2.a states that with one or more penetration flow paths with one PCIV inoperable, operation...may continue provided that within the subsequent 4 hours (8 hours for MSIVs and 72 hours for EFCVs)...at least one valve in each line having an inoperable valve is deactivated in the isolated condition. This action covers the condition for penetrations with either one or two PCIVs. ITS 3.6.1.3 ACTION C covers inoperabilities associated with penetrations with one PCIV and allows a 4 hour Completion Time to isolate the affected penetration except for EFCVs and penetrations with a closed system and a 72 hour Completion Time to isolate the affected penetration for EFCVs and penetrations with a closed system. This changes the CTS by extending the Completion Time from 4 hours to 72 hours for an inoperable PCIV associated with a closed system. | 3.6.1.3 ACTION C | 3.7.D.2.a | 4 |
| 3.6.1.3 L.5 | CTS 4.7.D.2 and CTS 4.7.D.3 require verification that specified containment penetrations are closed. ITS 3.6.1.3 Required Actions | 3.6.1.3 Required Actions A.2, C.2, | 4.7.D.2, 4.7.D.3 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | A.2, C.2, and D.2 include a similar requirement, but contain a Note (Note 2) that allows isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. This changes the CTS by allowing certain isolation devices to not require physical verification. | and D.2 Note 2 | | |
| 3.6.1.3 L.6 | CTS 3.7.D.3.a specifies that inerting and de-inerting operations permitted by TS 3.7.A.5.b shall be via the 18 inch purge and vent valves aligned to the Reactor Building plenum and vent, and that all other purging and venting, when primary containment integrity is required, shall be via the 2 inch purge and vent valve bypass line and the Standby Gas Treatment Systems. The ITS SR 3.6.1.3.1 Note states that the 18 inch primary containment purge and vent valves may be opened for inerting, de-inerting, pressure control, ALARA, or air quality considerations for personnel entry, or Surveillance that require the valves to be open. This changes the CTS by allowing the 18 inch containment purge and vent valves to be opened under more conditions than in the CTS. The change to the requirement that the 18 inch purge and vent valves, when opened, be aligned to the Reactor Building plenum and vent is discussed in DOC LA.3. | SR 3.6.1.3.1 Note | 3.7.D.3.a | 1 |
| 3.6.1.3 L.7 | CTS 3.7.A.2.a.(1) includes the requirements for all "manual" PCIVs since the CTS definition of Primary Containment Integrity (1.0.P) includes these valves. If a manual valve that is supposed to be closed is open (i.e., inoperable), CTS 3.7.A.2.a.(4) applies. CTS 3.7.A.2.a.(4) states, in part, "If requirements of 3.7.A.2.a.(1) cannot be met, restore Primary Containment Integrity within one hour," or a unit shutdown is required. Thus, if one or more manual PCIVs are inoperable, 1 hour is allowed by the CTS to restore OPERABILITY. ITS 3.6.1.3 ACTIONS A, B, and C do not differentiate | 3.6.1.3 ACTIONS Notes 1, 2, 3, and 4 and ACTIONS A, B, and C | 3.7.A.2.a.(4) | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | between automatic and manual valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected penetration flow path (depending upon the number of valves inoperable in the penetration and the type of penetration), prior to requiring a unit shutdown. In addition, ITS 3.6.1.3 ACTIONS Notes 1, 2, 3, and 4 allow penetration flow paths to be unisolated intermittently under administrative controls, allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for systems made inoperable by PCIVs, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding the overall containment leakage rate acceptance criteria. This changes the CTS by providing 4 hours (for two valve penetrations with one valve inoperable or for one valve penetrations, that are not excess flow check valve or closed system penetrations, with one valve inoperable) or 72 hours (for one valve penetrations, that are excess flow check valve or closed system penetrations, with one valve inoperable) to isolate a penetration flow path affected by an inoperable non-automatic primary containment isolation valve and continue to operate with the penetration flow path isolated. This also changes the CTS by allowing penetration flow paths to be unisolated intermittently under administrative controls, allows separate condition entry for each penetration flow path with an inoperable non-automatic PCIV, requiring entry into the applicable Conditions and Required Actions for systems made inoperable by inoperable non-automatic PCIVs, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1.1, "Primary Containment," when leakage through a penetration flow path due to an inoperable non-automatic PCIV | | | |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | results in exceeding the overall containment leakage rate acceptance criteria. | | | |
| 3.6.1.5 L.1 | CTS Table 3.2-7 Required Condition C allows 7 days to restore one inoperable Low-Low Set valve. ITS 3.6.1.5 ACTION A allows 14 days to restore the inoperable LLS valve to OPERABLE status. This changes the CTS by extending the time to restore an inoperable LLS valve from 7 days to 14 days. | 3.6.1.5 ACTION A | Table 3.2-7 Required Condition C | 3 |
| 3.6.1.5 L.2 | CTS Table 3.2-7 Required Condition C states, in part, that if the LLS valve cannot be made OPERABLE within 7 days then, reactor coolant pressure and temperature must be reduced to less than 110 psig and less than 345°F in 24 hours. ITS 3.6.1.5 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and extends the time to be outside of the Applicability of the Specification from 24 hours to 36 hours. The change to be in MODE 4 in lieu of the current requirement to reduce reactor coolant pressure to less than 110 psig and reactor coolant temperature to less than 345°F is discussed in DOC M.1. | 3.6.1.5 ACTION B | Table 3.2-7 Required Condition C | 3 |
| 3.6.1.6 L.1 | CTS 3.7.A.3.b allows an inoperability in only one reactor building-to-suppression chamber vacuum breaker line for any reason. In addition, the vacuum breakers in the line must still be ensuring primary containment integrity is met (i.e., both valves in the line cannot be open). ITS 3.6.1.6 ACTIONS Note and ACTIONS A, B, and D, specify ACTIONS for when both lines have inoperable reactor building-to-suppression chamber vacuum breaker(s) and when one line has both vacuum breakers open. Specifically, ITS 3.6.1.6 ACTION A in combination with the ACTIONS Note will allow each line to have one vacuum breaker open for up to 72 hours, ITS 3.6.1.6 | 3.6.1.6 ACTIONS Note, ACTIONS A, B, and D | 3.7.A.3.b | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ACTION B will allow one or both lines to have two vacuum breakers open for up to 1 hour, and ITS 3.6.1.6 ACTION D will allow both lines to have one or more vacuum breakers inoperable for opening for up to 1 hour. This changes the CTS by allowing multiple vacuum breakers to be operable based on the reason for and proximity of the inoperability, and adding an ACTIONS Note to permit separate condition entry for each relief line. | | | |
| 3.6.1.6 L.2 | CTS 3.7.A.3.c requires the unit to be placed in the cold shutdown condition within 24 hours if the inoperable reactor building-to-suppression chamber vacuum breaker cannot be restored to OPERABLE within 7 days. ITS 3.6.1.6 ACTION E requires the unit be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours. | 3.6.1.6 ACTION E | 3.7.A.3.c | 3 |
| 3.6.1.7 L.1 | CTS 3.7.A.4.c allows two of the eight suppression chamber-to-drywell vacuum breakers to be inoperable, provided that: 1) the vacuum breakers are fully closed and at least one alarm circuit is OPERABLE; or 2) the vacuum breaker is secured in the closed position or replaced by a blank flange. ITS 3.6.1.7 continues to require all eight suppression chamber-to-drywell vacuum breakers to be closed and provides actions for when a vacuum breaker is inoperable for opening (ITS 3.6.1.7 ACTION A), however, the ITS does not include the additional requirements that when a suppression chamber-to-drywell vacuum breaker is inoperable for opening, at least one alarm circuit is OPERABLE for the inoperable vacuum breaker or the inoperable vacuum breaker is secured in the closed position or replaced by a blank flange. This changes the CTS by deleting these additional | None | 3.7.A.4.c | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | requirements when a suppression chamber-to-drywell vacuum breaker is inoperable for opening. | | | |
| 3.6.1.7<br>L.2 | CTS 3.7.A.4.e, 4.7.A.4.a.(3), and 4.7.A.4.c specify requirements for vacuum breaker position alarm circuits. ITS 3.6.1.7 does not include position indication-only or alarm circuits as a requirement for vacuum breaker OPERABILITY. This changes the CTS by deleting the requirements for vacuum breaker position indication-only and alarm circuits. | None | 3.7.A.4.e,<br>4.7.A.4.a.(3),<br>4.7.A.4.c | 1 |
| 3.6.1.7<br>L.3 | CTS 3.7.A.4.f requires the unit to be placed in the cold shutdown condition within 24 hours if the requirements of CTS 3.7.A.4 are not met. ITS 3.6.1.7 ACTION C requires the unit be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours. | 3.6.1.7 ACTION C | 3.7.A.4.f | 3 |
| 3.6.1.8<br>L.1 | When two RHR containment spray (i.e., drywell spray) subsystems are inoperable, a plant shutdown is required by CTS 3.5.C.3; no time is provided to restore a subsystem. With two RHR drywell spray subsystems inoperable, ITS 3.6.1.8 ACTION B will allow 8 hours to restore one inoperable RHR drywell spray subsystem prior to requiring a plant shutdown. This changes the CTS by allowing 8 hours to restore one of two inoperable RHR drywell spray subsystems prior to requiring a plant shutdown. | 3.6.1.8 ACTION B | 3.5.C.3 | 4 |
| 3.6.1.8<br>L.2 | CTS 3.5.C.3 requires the plant to be shut down and reactor water temperature reduced to less than 212°F within 24 hours if the requirements of CTS 3.5.C.1 or CTS 3.5.C.2 are not met. Under similar conditions (as modified by DOC L.1), ITS 3.6.1.8 ACTION C requires the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the plant to be in MODE 3 | 3.6.1.8 ACTION C | 3.5.C.3 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | in 12 hours and by extending the time to reduce reactor water temperature to < 212°F (i.e., MODE 4) from 24 hours to 36 hours. | | | |
| 3.6.2.1 L.1 | CTS 3.7.A.1 is applicable, in part, when irradiated fuel is in the reactor vessel and work is being done which has the potential to drain the vessel. As a consequence of this Applicability, CTS 3.7.A.1.f requires suspending all activities with the potential for draining the reactor vessel if the requirements of CTS 3.7.A.1 cannot be met. ITS 3.6.2.1 is applicable only in MODES 1, 2, and 3. This changes the CTS by deleting the requirement for the suppression pool water temperature to be within limits when irradiated fuel is in the reactor vessel and work is being done that has the potential to drain the reactor vessel and the requirement to suspend those operations when the LCO is not met. | 3.6.2.1 Applicability | 3.7.A.1, 3.7.A.1.f | 2 |
| 3.6.2.1 L.2 | CTS 3.7.A.1.f requires the reactor be placed in a cold shutdown condition within 24 hours if the suppression pool temperature is > 90°F and testing that adds heat to the suppression pool is not the cause of exceeding 90°F. ITS 3.6.2.1 ACTION A provides 24 hours to restore the suppression pool temperature to ≤ 90°F, provided the suppression pool temperature is verified to be ≤ 110°F once per hour, prior to requiring the unit to exit the Applicability of the LCO. This changes the CTS by allowing 24 hours to restore suppression pool temperature to ≤ 90°F when testing that added heat was not the cause of exceeding 90°F, provided suppression pool temperature is verified ≤ 110°F once per hour. | 3.6.2.1 ACTION A | 3.7.A.1.f | 4 |
| 3.6.2.1 L.3 | CTS 3.7.A.1.f requires the reactor be placed in a cold shutdown condition within 24 hours if the suppression pool temperature exceeds 100°F during test operation which adds heat to the suppression pool. | 3.6.2.1 ACTION C | 3.7.A.1.f | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | ITS 3.6.2.1 ACTION C requires suspending all testing that adds heat to the suppression pool immediately. Once testing is suspended, ITS 3.6.2.1 ACTION A would allow 24 hours to restore temperature to ≤ 90°F, consistent with the time allowed in CTS 3.7.A.1.b. This changes the CTS by providing an allowance to suspend testing that adds heat to the suppression pool if suppression pool temperature exceeds 100°F, in lieu of requiring a unit shutdown. | | | |
| 3.6.2.1<br>L.4 | CTS 3.7.A.1.f requires the unit to be placed in a cold shutdown condition within 24 hours if the requirements of CTS 3.7.A.1 cannot be met. ITS 3.6.2.1 Required Action D.3 requires the reactor be in MODE 4 in 36 hours. This changes the CTS by extending the time allowed to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours. | 3.6.2.1 Required Actions D.3 and E.2 | 3.7.A.1.f | 3 |
| 3.6.2.1<br>L.5 | CTS 4.7.A.1.d requires an extended visual examination of the suppression chamber before resuming power operation whenever there is indication of relief valve operation with a suppression pool temperature of ≥ 160° F and the primary coolant system pressure > 200 psig. The ITS does not include this Surveillance Requirement. This changes the CTS by deleting the Surveillance Requirement to perform a suppression chamber inspection based on special temperature and pressure conditions. | None | 4.7.A.1.d | 5 |
| 3.6.2.2<br>L.1 | CTS 3.7.A.1.f requires the unit to be placed in the cold shutdown condition within 24 hours if the suppression pool water level requirements of CTS 3.7.A.1.e are not met. ITS 3.6.2.2 ACTION B requires the unit to be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time allowed to be in cold shutdown | 3.6.2.2 ACTION B | 3.7.A.1.f | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | (i.e., MODE 4) from 24 hours to 36 hours. | | | |
| 3.6.2.3 L.1 | When two RHR suppression pool cooling subsystems are inoperable, a unit shutdown is required by CTS 3.5.C.3; no time is provided to restore a subsystem. With two RHR suppression pool cooling subsystems inoperable, ITS 3.6.2.3 ACTION B will allow 8 hours to restore one inoperable RHR suppression pool cooling subsystem prior to requiring a unit shutdown. This changes the CTS by allowing 8 hours to restore one of two inoperable RHR suppression pool cooling subsystems prior to requiring a unit shutdown. | 3.6.2.3 ACTION B | 3.5.C.3 | 4 |
| 3.6.2.3 L.2 | CTS 3.5.C.3 requires the unit to be shut down and reactor water temperature reduced to less than 212°F within 24 hours if the requirements of CTS 3.5.C.1 or CTS 3.5.C.2 are not met. Under similar conditions (as modified by DOC L.1), ITS 3.6.2.3 ACTION C requires the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to reduce reactor water temperature to < 212°F (i.e., MODE 4) from 24 hours to 36 hours. | 3.6.2.3 ACTION C | 3.5.C.3 | 3 |
| 3.6.4.1 L.1 | CTS 3.7.C.2.c requires the secondary containment to be OPERABLE when the fuel cask is being moved within the reactor building and CTS 3.7.C.4.b.3 provides actions when this is not met. ITS 3.6.4.1 does not include this requirement. This changes the CTS by deleting the requirement to maintain the secondary containment OPERABLE when the fuel cask is being moved within the reactor building. | None | 3.7.C.2.c, 3.7.C.4.b.3 | 1 |
| 3.6.4.1 L.2 | CTS 3.7.C.4 does not provide any explicit time to restore the secondary containment to OPERABLE status when it is found inoperable prior to requiring a unit shutdown. Under similar conditions, ITS 3.6.4.1 ACTION A provides 4 hours to restore the secondary containment to OPERABLE status in MODE 1, 2, and 3 | 3.6.4.1 ACTION A | None | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore an inoperable secondary containment to OPERABLE status prior to requiring a unit shutdown. | | | |
| 3.6.4.1 L.3 | CTS 4.7.C.1.a requires the secondary containment capability test to be performed "prior to refueling." ITS SR 3.6.4.1.4 includes a similar test, but does not include the mode restrictions for performing the required test. This changes the CTS by deleting the requirement to perform the Surveillance "prior to refueling." | SR 3.6.4.1.4 | 4.7.C.1.a | 7 |
| 3.6.4.2 L.1 | CTS 3.7.C.2.c requires the SCIVs to be OPERABLE when the fuel cask is being moved within the reactor building and CTS 3.7.C.4.b.3 provides actions when this is not met. ITS LCO 3.6.4.2 does not include this requirement. This changes the CTS by deleting the requirement to maintain the SCIVs OPERABLE when the fuel cask is being moved within the reactor building. | None | 3.7.C.2.c, 3.7.C.4.b.3 | 1 |
| 3.6.4.2 L.2 | CTS 3.7.C.3 requires the associated penetration flow path isolated when a secondary containment isolation valve is inoperable and not restored to OPERABLE status. However, this action does not include a provision that isolated valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.6.4.2 ACTIONS Note 1 allows any secondary containment penetration flow path, isolated due to an inoperable SCIV, to be unisolated intermittently under administrative controls. This changes the CTS by allowing the secondary containment penetrations to be opened under administrative controls when the associated penetration has been closed to satisfy the actions. | 3.6.4.2 ACTIONS Note 1 | None | 4 |
| 3.6.4.2 L.3 | CTS 3.7.C.3 allows 8 hours to either restore or isolate an inoperable secondary containment isolation damper (reactor building automatic isolation dampers) if one damper associated with a penetration flow | 3.6.4.2 ACTIONS A and B | 3.7.C.3, 3.7.C.4 | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | path is inoperable. If two dampers in a penetration are inoperable, CTS 3.7.C.4 must be entered immediately and an orderly shutdown is required. In addition, if a manual valve or blind flange is inoperable, CTS 3.7.C.4 must be entered immediately since CTS 3.7.C.3 only applies to the reactor building automatic dampers. ITS 3.6.4.2 ACTION A covers the condition of one or more penetration flow paths with one SCIV inoperable and it allows 8 hours to isolate the penetration flow path. However, it applies to all types of SCIVs, both automatic and manual. ITS 3.6.4.2 ACTION B covers the condition of one or more penetration flow paths with two SCIVs inoperable and it requires isolation of the penetration flow path within 4 hours. This changes the CTS by providing an 8 hour Completion Time for an inoperable non-automatic SCIV in a penetration flow path with one inoperable SCIV prior to requiring a unit shutdown and a 4 hour Completion Time if a penetration includes two SCIVs and both are inoperable prior to requiring a unit shutdown. | | | |
| 3.6.4.2<br>L.4 | CTS 3.7.C.3 states that with an inoperable secondary containment isolation damper inoperable, isolate the affected duct by use of a closed damper or blind flange. ITS 3.6.4.2 Required Action A.1 requires that with one or more penetration flow paths with one SCIV inoperable, the affected penetration flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange. This changes the CTS by allowing a manual valve as the means of isolating the penetration flow path. The change that requires de-activating the damper is discussed in DOC A.7. | 3.6.4.2 Required Action A.1 | 3.7.C.3 | 4 |
| 3.6.4.2<br>L.5 | CTS 4.7.C.1.b.(2) requires verification that each automatic damper actuates to its isolation position "After maintenance, repair or replacement work is performed on the damper or its associated | SR 3.6.4.2.3 | 4.7.C.1.b.(2) | 5 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | actuator, control circuit, or power circuit." ITS SR 3.6.4.2.3 requires a similar test, however this specific Frequency is not required. This changes the CTS by deleting this post-maintenance Surveillance. | | | |
| 3.6.4.3<br>L.1 | CTS 3.7.B.1.b requires the unit to be in Cold Shutdown (MODE 4) if two SGT subsystems are inoperable with reactor water temperature $\geq$ 212˚F. ITS 3.6.4.3 ACTION D requires the unit to enter LCO 3.0.3 under the same conditions. This will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring the unit to enter LCO 3.0.3 instead of requiring a unit shutdown to MODE 4 within 36 hours, which effectively extends the time the unit is required to be in MODE 4 by 1 hour, however it also requires the unit to be at the specified intermediate conditions sooner. | 3.6.4.3 ACTION D | 3.7.B.1.b | 3 |
| 3.6.4.3<br>L.2 | CTS 3.7.B.2.c requires verification of the automatic actuation of the SGT subsystem upon a receipt of the specified inputs (i.e., test signal). ITS SR 3.6.4.3.3 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of an actual signal for the test. | SR 3.6.4.3.3 | 3.7.B.2.c | 6 |
| 3.6.4.3<br>L.3 | CTS 3.7.B.1 requires the SGT System to be OPERABLE whenever the secondary containment integrity is required and CTS 3.7.C.2.c requires the secondary containment to be OPERABLE when the fuel cask is being moved within the reactor building. CTS 3.7.B.1.c.1)(b), CTS 3.7.B.1.c.2)(a), and CTS 3.7.B.1.d provides actions when this is not met. ITS 3.6.4.3 does not include this requirement. This changes the CTS by deleting the requirement to maintain the SGT System OPERABLE when the fuel cask is being moved within the reactor building. | None | 3.8.B.1,<br>3.7.B.1.c.1((b),<br>3.7.B.1.c.2)(a),<br>3.7.B.1.d | 1 |
| 3.7.1 | When two RHRSW subsystems are inoperable, a unit shutdown is | 3.7.1 | 3.5.C.3 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| L.1 | required by CTS 3.5.C.3; no time is provided to restore a subsystem prior to requiring the unit shutdown. With two RHRSW subsystems inoperable, ITS 3.7.1 ACTION B will allow 8 hours to restore one inoperable RHRSW subsystem prior to requiring a unit shutdown. This changes the CTS by allowing 8 hours to restore one of two inoperable RHRSW subsystems prior to requiring a unit shutdown. | ACTION B | | |
| 3.7.1<br>L.2 | CTS 3.5.C.3 requires the unit to be shutdown and reactor water temperature reduced to less than 212°F within 24 hours if the requirements of CTS 3.5.C.1 or CTS 3.5.C.2 are not met. ITS 3.7.1 ACTION C requires the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to reduce reactor water temperature to < 212°F (i.e., MODE 4) from 24 hours to 36 hours. | 3.7.1 ACTION C | 3.5.C.3 | 3 |
| 3.7.4<br>L.1 | CTS 3.17.B.1 requires two CREF subsystems to be OPERABLE, but does not allow the main control room boundary to be opened intermittently under administrative controls. If it is opened, both CREF subsystems are inoperable. ITS LCO 3.7.4 also requires the two CREF subsystems to be OPERABLE, however a Note to the LCO is included that allows the main control room boundary to be opened intermittently under administrative controls. This changes the CTS by allowing the main control room boundary to be opened intermittently under administrative controls and not consider the CREF System to be inoperable. | LCO 3.7.4 Note | 3.17.B.1 | 1 |
| 3.7.4<br>L.2 | CTS 4.17.B.1 requires that each CREF subsystem be initiated with 1000 cfm (± 10%) of flow and operated for 10 hours. ITS SR 3.7.4.1 includes a similar requirement, except the flow rate is not specified. | SR 3.7.4.1 | 4.17.B.1 | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | This changes the CTS by deleting the flow rate requirement from the Surveillance acceptance criteria. | | | |
| 3.7.4 L.3 | CTS 3.17.B.2.c.(3) and 4.17.B.2.c.(3) require verification of the automatic actuation of each CREF subsystem upon a receipt of the specified inputs (i.e., simulated signal). ITS SR 3.7.4.3 specifies that the signal may be from either an "actual" or "simulated" initiation signal. This changes the CTS by explicitly allowing the use of an actual signal for the test. | SR 3.7.4.3 | 3.17.B.2.c.(3), 4.17.B.2.c.(3) | 6 |
| 3.7.4 L.4 | CTS 4.17.B.2.c.(3) requires each CREF subsystem to be operating in the pressurization mode of operation while maintaining the control room at a positive pressure with respect to adjacent areas, at least once per operating cycle. ITS SR 3.7.4.4 requires this same test, however it is required to be performed every 24 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test to be performed using each CREF subsystem at least once per 48 months. | SR 3.7.4.4 | 4.17.B.2.c.(3) | 7 |
| 3.7.4 L.5 | CTS 4.17.B.2.c.(3) requires each CREF subsystem to be operating in the pressurization mode of operation while maintaining the control room at a positive pressure with respect to adjacent areas with a flow rate of 1000 cfm ($\pm$ 10%). ITS SR 3.7.4.4 requires this same test, however the flow rate limit is specified to be $\leq$ 1100 cfm. This changes the CTS by deleting the minimum flow rate limit. | SR 3.7.4.4 | 4.17.B.2.c.(3) | 6 |
| 3.7.5 L.1 | CTS 4.17.A.1 requires verification that the control room temperature is within limit. ITS 3.7.5 does not include this requirement. This changes the CTS by eliminating the Surveillance Requirement to verify control room temperature. | None | 4.17.A.1 | 5 |
| 3.7.8 L.1 | CTS 4.10.C.1 requires a verification every 24 hours that the spent fuel storage pool water level is within the limit. ITS SR 3.7.8.1 requires | SR 3.7.8.1 | 4.10.C.1 | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | verifying the spent fuel storage pool water level is within the limit every 7 days. This changes the CTS by extending the Surveillance Frequency from 24 hours to 7 days. | | | |
| 3.8.1 L.1 | CTS 3.9.B requires a plant shutdown when two required offsite circuits are inoperable. ITS 3.8.1 ACTION C covers the condition of two required offsite circuits inoperable and requires the restoration of one required offsite circuit to OPERABLE status within 24 hours. This changes the CTS by providing some time to restore inoperable AC Sources prior to requiring a plant shutdown when two required offsite circuits are inoperable. | 3.8.1 ACTION C | 3.9.B | 4 |
| 3.8.1 L.2 | CTS 3.9.B.2 allows 72 hours to restore an inoperable AC source. However, this 72 hour restoration time is only allowed if transformer 1R or 2R is OPERABLE. ITS 3.8.1 ACTION A allows the 72 hour restoration time regardless of which transformer is OPERABLE (i.e., transformer 1AR may be the only OPERABLE transformer). This changes the CTS by allowing a 72 hour Completion Time for an inoperable required offsite circuit regardless of which transformer remains OPERABLE. | 3.8.1 ACTION A | 3.9.B.2 | 4 |
| 3.8.1 L.3 | When an EDG is found to be inoperable, CTS 3.9.B.3.a.1) requires a demonstration that the remaining EDG is OPERABLE within 24 hours. CTS 3.9.B.3.a.1) also states that the test is required to be completed regardless of when the inoperable EDG is restored to OPERABILITY. CTS 3.9.B.3.a.1) further states that the OPERABILITY of the other EDG need not be demonstrated if the EDG inoperability was due to preplanned preventative maintenance or testing. ITS 3.8.1 Required Action B.3.2 includes a requirement to perform SR 3.8.1.2, which requires the verification that the EDG starts from standby conditions and achieves steady state voltage and frequency. In addition, ITS | 3.8.1 Required Actions B.3.1 and B.3.2 | 3.9.B.3.a.1) | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | 3.8.1 Required Action B.3.1 has been added and provides the option to determine OPERABLE EDG(s) are not inoperable due to a common cause failure. This changes the CTS by providing an allowance to not start an OPERABLE EDG as long as it can be shown that there is no common mode failure for any reason, not just due to preplanned preventative maintenance or testing, and deletes the requirement to perform the OPERABILITY demonstration within 24 hours even if the other EDG is restored to OPERABLE status. | | | |
| 3.8.1<br>L.4 | CTS 3.9.B.3.a.2) requires the plant to be placed in cold shutdown when both EDGs are inoperable. ITS 3.8.1 ACTION E covers the condition when two EDGs are inoperable and allows 2 hours to restore one EDG to OPERABLE status prior to requiring a plant shutdown per ITS 3.8.1 ACTION F. This changes the CTS by providing 2 hours to restore one EDG to OPERABLE status when it is discovered that both EDG subsystems are inoperable prior to requiring a unit shutdown. | 3.8.1 ACTION E | 3.9.B.3.a.2) | 3 |
| 3.8.1<br>L.5 | CTS 1.0.L allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source, provided its corresponding normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. CTS 1.0.L requires the equipment to be declared inoperable immediately when these requirements are not met. ITS 3.8.1 Required Action A.2 (which applies when one required offsite source is inoperable) requires the declaration of required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable. The Completion Time for ITS 3.8.1 Required Action A.2 is 24 hours from discovery of no offsite power to one division concurrent | 3.8.1 Required Actions A.2, B.2, and C.1 | 1.0.L | 3 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | with inoperability of redundant required feature(s). ITS 3.8.1 Required Action B.2 (which applies when one required EDG is inoperable) requires the declaration of required feature(s), supported by the inoperable EDG, inoperable when the required redundant feature(s) are inoperable. The Completion Time allowed for ITS 3.8.1 Required Action B.2 is 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s). ITS 3.8.1 Required Action C.1 (which applies when two required offsite circuits are inoperable) requires the declaration of required feature(s) inoperable when the redundant required feature(s) are inoperable. The Completion Time for ITS 3.8.1 Required Action C.1 is 12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing more time to restore inoperable equipment. | | | |
| 3.8.1<br>L.6 | CTS 4.9.B.3.a.1) requires, in part, a verification that each EDG is capable of operating at "approximately rated load" for at least 60 minutes. ITS SR 3.8.1.3 requires the same verification, however the test is allowed to be performed at a load of 2250 kW to 2500 kW, which corresponds to 90% and 100% of rated load. In addition, Note 2 to SR 3.8.1.3 states that momentary transients outside the load range do not invalidate this test. This changes the CTS by allowing the EDGs to be tested at a slightly lower load during this Surveillance. | SR 3.8.1.3, including Note 2 | 4.9.B.3.a.1) | 6 |
| 3.8.1<br>L.7 | CTS 4.9.B.3.a.2) contains a requirement to simulate a loss of offsite power in conjunction with an ECCS actuation test signal "during shutdown." ITS SR 3.8.1.12 requires a similar test, and includes a Note (Note 2) that states the Surveillance shall not normally be performed in MODE 1, 2, or 3. The Note also states that portions of the Surveillance may be performed to reestablish OPERABILITY | SR 3.8.1.12 Note 2 | 4.9.B.3.a.2) | 9 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | provided an assessment determines the safety of the plant is maintained or enhanced. It further states that credit may be taken for unplanned events that satisfy this SR. This changes the CTS by allowing the Surveillances to be performed in the operating MODES, provided the Surveillance is performed to reestablish OPERABILITY and an assessment is performed to determine plant safety is maintained or enhanced, or provided that it is an unplanned event that satisfies the requirements of the SR. | | | |
| 3.8.1 L.8 | CTS 4.9.B.3.a.2) requires verification of EDG performance following a "simulated" loss of offsite power in conjunction with an ECCS actuation "test" signal. ITS SR 3.8.1.12 performs a similar test, but specifies that each signal may be from either an "actual" or "simulated" (i.e., test) signal. This changes the CTS by explicitly allowing the use of an actual signal for the test. | SR 3.8.1.12 | 4.9.B.3.a.2) | 6 |
| 3.8.1 L.9 | CTS 4.9.B.3.b.2) requires the diesel fuel oil transfer system to be tested "during the monthly generator test." ITS SR 3.8.1.5, which requires the same Surveillance to be performed once per 31 days, does not include the requirement that it be performed "during the monthly generator test." This changes the CTS by deleting the requirement to test the diesel fuel oil transfer system during the monthly generator test, and allowing it to be tested any time during the 31 day period. | SR 3.8.1.5 | 4.9.B.3.a.2) | 7 |
| 3.8.2 L.1 | CTS 3/4.9 does not contain any specific OPERABILITY requirements for the qualified offsite circuits and EDGs during shutdown conditions. However, the CTS 1.0.W definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources... that are required for the system, subsystem, train, component or device to perform its | LCO 3.8.2 | 1.0.W | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | function(s) are also capable of performing their related support function(s)."  Furthermore, the definition states that if the normal or emergency power source is inoperable, the system, subsystem, train, component or device may be considered OPERABLE provided the corresponding normal or emergency power source is OPERABLE and all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE.  New requirements were added as ITS LCO 3.8.2.a and LCO 3.8.2.b.  ITS LCO 3.8.2.a requires one qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems - Shutdown," and ITS LCO 3.8.2.b requires one EDG capable of supplying one division of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.  ITS 3.8.2 is required in MODES 4 and 5 and during the movement of irradiated fuel assemblies in the secondary containment.  This changes the CTS by adding an explicit LCO for an offsite circuit and emergency source during shutdown conditions (i.e., MODES 4 and 5 and during the movement of irradiated fuel assemblies in the secondary containment). | | | |
| 3.8.3<br>L.1 | The CTS 3.9.B.3.b does not provide explicit compensatory actions if the volume of fuel oil in the storage tank is less than the specified limit.  Thus, if the minimum indicated volume is not met, both EDGs must be declared inoperable and CTS 3.9.B.3.a.2), which requires a plant shutdown, must be entered.  ITS 3.8.3 ACTION A allows the unit to not declare the EDGs inoperable provided the volume of stored fuel oil is greater than that needed to operate a EDG for 6 days at full load (i.e., > 33,600 gallons).  In this situation, ITS 3.8.3 Required Action A.1 allows 48 hours to restore the fuel oil volume to within limits.  If | 3.8.3 ACTIONS A and G | 3.9.B.3.a.2) | 4 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | this Required Action and associated Completion Time is not met or if the EDG fuel oil storage tank volume is ≤ 33,600 gallons, both EDGs must be declared inoperable immediately and appropriate ACTIONS taken per ITS 3.8.1 (ITS 3.8.3 ACTION G). Any changes to the Actions taken after the EDGs are declared inoperable are discussed in the Discussion of Changes in ITS 3.8.1. This changes the CTS by allowing a time period to restore the fuel oil to within limits. | | | |
| 3.8.4 L.1 | When one of the two 125 VDC battery systems or one of the two 250 V battery systems is made or found to be inoperable, CTS 3.9.B.4 requires a plant shutdown; no time is provided to restore the inoperable battery systems. ITS 3.8.4 ACTION A covers the condition for one or more Division 1 or Division 2 required battery chargers inoperable and requires the restoration of battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours, the verification that battery float current is ≤ 2 amps for 250 VDC batteries and ≤ 1 amp for 125 VDC batteries once per 12 hours, and the restoration of the inoperable battery charger(s) to OPERABLE status within 7 days. If one Division 1 or Division 2 DC electrical power subsystem is inoperable for reasons other than those specified in ITS 3.8.4 ACTION A, ITS 3.8.4 ACTION B requires the restoration of the inoperable DC electrical power subsystem within 2 hours. This changes the CTS by providing a restoration time for inoperable Division 1 or Division 2 battery chargers and inoperable Division 1 or Division 2 battery subsystem for reasons other than for inoperable chargers (i.e., an inoperable battery or batteries) prior to requiring a plant shutdown. | 3.8.4 ACTIONS A and B | 3.9.B.4 | 4 |
| 3.8.6 L.1 | CTS 3.9.B.4 requires a reactor shutdown if one of the two 125 VDC battery systems or 250 VDC battery systems is inoperable. In | 3.8.6 ACTIONS Note, 3.8.6 | 3.9.B, 3.9.B.4 | 4 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | addition, when more than one 125 VDC or 250 VDC battery system is inoperable, CTS 3.9.B also requires a reactor shutdown. These Actions are applicable when the battery systems are inoperable due to battery parameters not within limits. In lieu of requiring an reactor shutdown under these conditions, the ITS 3.8.6 ACTIONS provide compensatory actions, when battery parameters are not within limits, to be taken prior to declaring the associated battery inoperable. This changes the CTS by adding compensatory actions for battery parameters not within limits. | ACTIONS a, B, C, D, E, and F | | |
| 3.8.6 L.2 | CTS 4.9.B.4.a requires the verification that the pilot cell voltage and temperature of the adjacent cells are within limits. ITS SR 3.8.6.2 requires verification of battery pilot cell voltage every 31 days while ITS SR 3.8.6.4 requires verification of the battery pilot cell temperature every 31 days. This changes the CTS by extending the Surveillance interval for verification of pilot cell voltage and temperature from 7 days to 31 days. The change to measure the battery pilot cell temperature instead of the adjacent cells to the pilot cells is discussed in DOC L.4. | SR 3.8.6.2, SR 3.8.6.4 | 4.9.B.4.a | 7 |
| 3.8.6 L.3 | CTS 4.9.B.4.a requires verification of pilot cell specific gravity every week and CTS 4.9.B.4.b requires verification of each cell specific gravity every 3 months. ITS 3.8.6 does not include these Surveillances. This changes the CTS by deleting these Surveillances. | None | 4.9.B.4.a, 4.9.B.4.b | 5 |
| 3.8.6 L.4 | CTS 4.9.B.4.a requires verification of electrolyte temperature of all cells adjacent to the pilot cells. ITS SR 3.8.6.4 requires verification of each pilot cell temperature. This changes the CTS by reducing the number of cells that must be monitored for electrolyte temperature. | SR 3.8.6.4 | 4.9.B.4.a | 6 |
| 3.8.6 L.5 | CTS 4.9.B.4.b requires verification of the temperature of every fifth cell every 3 months. ITS 3.8.6 does not include this Surveillance. | None | 4.9.B.4.b | 5 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | This changes the CTS by deleting this Surveillance. | | | |
| 3.8.6<br>L.6 | CTS 4.9.B.4.c requires the "rated load discharge test" (i.e., a "performance discharge test" in the ITS) to be performed every refueling interval. ITS SR 3.8.6.6 is performed every 60 months, every 12 months when the battery shows degradation or has reached 85% if the expected life with capacity < 100% of manufacturer's rating, and every 24 months when the battery has reached 85% of the expected life with capacity > 100% of manufacturer's rating. This changes the CTS by extending the Frequency from every refueling interval to 60 months, provided the battery has not reached 85% of expected life. If the battery has reached 85% of expected life, then the Frequency is maintained at the current 24 months (the term "refueling interval" is changed to "24 months"), provided the battery capacity is ≥ 100% of the manufacturer's rating. The CTS is also changed by adding an accelerated Frequency of 12 months if the battery has reached 85% of expected life and the capacity is < 100% of manufacturer's rating. | SR 3.8.6.6 | 4.9.B.4.c | 7 |
| 3.8.6<br>L.7 | CTS 4.9.B.4.c requires the performance of a "rated load discharge" test of the Division 1 and Division 2 250 VDC and 125 VDC batteries. ITS SR 3.8.6.6 requires the performance of a "performance discharge" test or a "modified performance discharge" test. This changes the CTS by adding the allowance to perform a modified performance discharge test instead of the performance discharge test (equivalent to the rated load discharge test). | SR 3.8.6.6 | 4.9.B.4.c | 6 |
| 3.8.6<br>L.8 | CTS 4.9.B.4.c requires the performance of a rated load discharge test of the Division 1 and Division 2 250 VDC and 125 VDC batteries. At the completion of this test, the CTS requires the determination of specific gravity and voltage of each cell. ITS SR 3.8.6.6 does not | None | 4.9.B.4.c | 6 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | require this verification. This changes the CTS by deleting the requirement to determine specific gravity and voltage at the completion of the test. | | | |
| 3.8.7 L.1 | CTS 3.9.B.4 requires a plant shutdown when one of the two 125V battery systems or one of the two 250V battery systems is made or found to be inoperable for any reason. CTS 3.9.B requires a plant shutdown when any AC electrical power distribution subsystem or more than one 125 V or 250 V DC battery system is inoperable. ITS 3.8.7 ACTION A covers the condition for one or more AC electrical power distribution subsystems inoperable, and requires the restoration of the AC electrical power distribution subsystem(s) to OPERABLE status within 8 hours. A Note to the ACTION also requires entry into LCO 3.8.4, "DC Source - Operating," for DC divisions made inoperable by the inoperable AC power distribution subsystems. ITS 3.8.7 ACTION B covers the condition for one or more DC electrical power distribution subsystems inoperable, and requires the restoration of the DC electrical power distribution subsystem(s) to OPERABLE status within 2 hours. This changes the CTS by providing some time to restore inoperable AC or DC electrical power distribution subsystems prior to requiring a plant shutdown, provided a loss of function has not occurred. | 3.8.7 ACTIONS A (including Note) and B | 3.9.B, 3.9.B.4 | 4 |
| 3.9.1 L.1 | CTS 3.10.A requires the reactor mode switch to be in the refuel position during "core alterations" and the refueling interlocks to be OPERABLE. ITS LCO 3.9.1 requires the refueling equipment interlocks associated with the reactor mode switch refuel position to be OPERABLE during "in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position." This changes the CTS by requiring the refuel | 3.9.1 Applicability | 3.10.A | 2 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | equipment interlocks to be OPERABLE only during certain CORE ALTERATIONS (i.e., during in-vessel fuel movement). | | | |
| 3.9.1<br>L.2 | CTS 3.10.A requires the reactor mode switch to be "locked" in the refuel position. ITS 3.9.1 is applicable when the reactor mode switch is in the refuel position. This changes the CTS by deleting the requirement to lock the reactor mode switch when in the refuel position. | 3.9.1 Applicability | 3.10.A | 1 |
| 3.9.1<br>L.3 | CTS 3.10.A does not provide specific Actions for when the refueling equipment interlocks are inoperable. However, since the refueling interlocks must be OPERABLE during CORE ALTERATIONS, this implies that CORE ALTERATIONS must be suspended if the refueling interlocks are inoperable. ITS 3.9.1 ACTION A covers the condition when one or more required refueling equipment interlocks are inoperable and requires either the immediate suspension of in-vessel fuel movement with equipment associated with the inoperable interlock(s) or the insertion of a control rod withdrawal block and a verification that all control rods are fully inserted. This changes the CTS by providing specific Actions for when a refueling equipment interlock is not met. | 3.9.1 ACTION A | 3.10.A | 4 |
| 3.9.1<br>L.4 | CTS 4.10.A requires the refueling interlocks (in this case the refueling equipment interlocks) to be functional tested "following any repair work associated with the interlocks." ITS SR 3.9.1.1 does not require this verification "following any repair work associated with the interlocks." This changes the CTS by eliminating the requirement to functionally test the refueling equipment interlocks "following any repair work associated with the interlocks." | None | 4.10.A | 5 |
| 3.9.2<br>L.1 | CTS 3.10.A requires the reactor mode switch to be in the refuel position during "core alterations" and the refueling interlocks to be | 3.9.2 Applicability | 3.10.A | 2 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | OPERABLE. ITS LCO 3.9.2 requires the refuel position one-rod-out interlock to be OPERABLE in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn. This changes the CTS by requiring the refuel position one-rod-out interlock to be OPERABLE only during certain CORE ALTERATIONS (in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn). | | | |
| 3.9.2<br>L.2 | CTS 4.10.A requires the refueling interlocks (in this case the refuel position one-rod-out interlock) to be functionally tested every 7 days. ITS SR 3.9.2.2 includes a Note that states the Surveillance is not required to be performed until 1 hour after any control rod is withdrawn. This changes the CTS by allowing the test to be delayed up to 1 hour after any control rod is withdrawn. | SR 3.9.2.2 | 4.10.A | 7 |
| 3.9.2<br>L.3 | CTS 4.10.A requires the refueling interlocks (in this case the refuel one-rod-out interlock) to be functionally tested "following any repair work associated with the interlocks." ITS SR 3.9.2.2 does not require this verification "following any repair work associated with the interlocks." This changes the CTS by eliminating the requirement to functionally test the refueling equipment interlocks "following any repair work associated with the interlocks." | None | 4.10.A | 5 |
| 3.9.5<br>L.1 | CTS 4.3.D requires a check of the status in the control room of the required OPERABLE accumulator every 12 hours. ITS SR 3.9.5.2 requires a similar verification that the pressure in each accumulator is $\geq$ 940 psig every 7 days. This changes the CTS extending the Surveillance Frequency from once every 12 hours to every 7 days. | SR 3.9.5.2 | 4.3.D | 7 |
| 3.9.5<br>L.2 | CTS 4.3.D requires, in part, the check of the status in the control room of the required OPERABLE accumulator level alarm. The ITS does not include this requirement. This changes the CTS by deleting the | None | 4.3.D | 6 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | requirement to verify the alarm for accumulator level in the control room. | | | |
| 3.10.1<br>L.1 | Various current Technical Specifications provide requirements for components to be OPERABLE when the reactor coolant temperature is > 212°F. For example, CTS 3.5.A.1 requires the Core Spray and LPCI subsystems to be OPERABLE whenever irradiated fuel is in the reactor vessel and the reactor water temperature is > 212°F. The above conditions could be met during an inservice leak or hydrostatic test. ITS LCO 3.10.1 states that the average reactor coolant temperature specified in Table 1.1-1 for MODE 4 may be changed to "NA," and operation considered not to be in MODE 3; and the requirements of LCO 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System - Cold Shutdown," may be suspended, to allow performance of an inservice leak or hydrostatic test provided the specific activity of the reactor coolant is ≤ 0.02 μCi/gm DOSE EQUIVALENT I-131 and the following MODE 3 LCOs are met: LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation" Functions 1, 3, and 4 of Table 3.3.6.2-1; LCO 3.6.4.1, "Secondary Containment;" LCO 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs);" and LCO 3.6.4.3, "Standby Gas Treatment (SGT) System." In addition, ITS SR 3.10.1.1 requires the performance of the applicable SRs for the required MODE 3 LCOs. In addition, appropriate ACTIONS have been included in the ITS. ITS 3.10.1 ACTION A covers the condition for one or more of the ITS LCO 3.10.1 requirements not met. ITS 3.10.1 Required Action A.1 requires immediate entry into the applicable Condition of the affected LCO. Furthermore, this Required Action is modified by a Note that states | LCO 3.10.1, ACTION A, SR 3.10.1.1 | Various CTS requirements | 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | "Required Actions to be in MODE 4 include reducing average reactor coolant temperature to $\leq$ 212°F." In lieu of performing ITS 3.10.1 Required Action A.1, ITS 3.10.1 Required Action A.2.1 requires an immediate suspension of activities that could increase the average reactor coolant temperature or pressure and ITS 3.10.1 Required Action A.2.2 requires the average reactor coolant temperature to be reduced to $\leq$ 212°F within 24 hours. ITS 3.10.1 ACTIONS include a Note that states "Separate Condition entry is allowed for each requirement of the LCO." This changes the CTS by not requiring many LCOs required to be met in MODE 3 to be met during an inservice leak or hydrostatic test performed with reactor coolant temperature > 212°F, provided certain requirements are met, and provides a specific ACTION and Surveillance Requirement. | | | |
| 3.10.2<br>L.1 | CTS 3.10.E applies during extended core and control rod drive maintenance. It allows more than one control rod to be withdrawn from the core during outages, provided that, except for momentary switching to the startup mode for interlock testing, the reactor mode switch shall be locked in the refuel position. The CTS does not allow reactor mode switch interlock testing during MODES 3 and 4, nor does it allow placing the mode switch in the run position during MODE 5. ITS LCO 3.10.2 allows the reactor mode switch position specified in Table 1.1-1 for MODES 3, 4, and 5 to be changed to include run, startup/hot standby, and refuel position, and operation considered not to be in MODE 1 or 2, to allow testing of instrumentation associated with the reactor mode switch interlock functions, provided the conditions specified in ITS LCO 3.10.2.a and b are met. ITS LCO 3.10.2.a requires all control rods to remain fully inserted in core | LCO 3.10.2,<br>3.10.2 ACTION A,<br>SR 3.10.2.1,<br>SR 3.10.2.2 | 3.10.E | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | cells containing one or more fuel assemblies and ITS LCO 3.10.2.b requires no CORE ALTERATIONS to be in progress. An ACTION has been provided (ITS 3.10.2 ACTION A) if these two conditions are not met. The ACTION requires the conditions to be met or to exit the LCO's Applicability (i.e., place the reactor mode switch in shutdown or refuel, as appropriate for the current MODE). Furthermore, two Surveillance Requirements have been added (ITS SR 3.10.2.1 and SR 3.10.2.2) to ensure these conditions are periodically met when using the allowances of this LCO. This changes the CTS by: a) allowing reactor mode switch testing to occur in MODES 3 and 4 with the reactor mode switch in the run, startup/hot standby, or refuel position; b) allowing reactor mode switch testing during MODE 5 operations to include the run position; c) providing appropriate actions if the LCO requirements are not met; and 4) providing appropriate Surveillances to periodically ensure the LCO requirements are met. | | | |
| 3.10.3<br>L.1 | The CTS does not allow the reactor mode switch to be placed in the refuel position to allow withdrawal of a single control rod when the unit is in Hot Shutdown (MODE 3). ITS 3.10.3 allows the reactor mode switch position in ITS Table 1.1-1 for MODE 3 to be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, provided specific requirements are met. In addition, an ACTION (ITS 3.10.3 ACTION A) has been added to cover the condition when one or more of the requirements of LCO 3.10.3 are not met. As stated in the ACTIONS Note, ACTION A is allowed to be entered separately for each requirement of the LCO not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the withdrawal | 3.10.3 | None | 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | of a single control rod in MODE 3 by placing the reactor mode switch in the refuel position, and operation not to be considered in MODE 2, provided certain requirements are met. | | | |
| 3.10.4 L.1 | The CTS does not allow the reactor mode switch to be placed in the refuel position to allow withdrawal of a single control rod when the unit is in Cold Shutdown (MODE 4). ITS 3.10.4 allows the reactor mode switch position in ITS Table 1.1-1 for MODE 4 to be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, and subsequent removal of the associated control rod drive if desired, provided specific requirements are met. In addition, ACTIONS (ITS 3.10.4 ACTIONS A and B) have been added to cover the condition when one or more of the requirements of LCO 3.10.4 are not met. As stated in the ACTIONS Note, ACTIONS A and B are allowed to be entered separately for each requirement of the LCO not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the withdrawal of a single control rod and subsequent removal of the CRD in MODE 4, by placing the reactor mode switch in the refuel position, and operation not to be considered in MODE 2, provided certain requirements are met. | 3.10.4 | None | 1 |
| 3.10.5 L.1 | CTS 3.3.B.1 allows a control rod to be uncoupled from its drive for inspection as long as the reactor is in the refueling mode. ITS 3.10.5 allows the requirements of LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation;" LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring;" LCO 3.9.1, "Refueling Equipment Interlocks," LCO 3.9.2, "Refuel Position One Rod Out Interlock;" LCO 3.9.4, "Control Rod Position Indication;" and LCO 3.9.5, "Control Rod | 3.10.5 | 3.3.B.1 | 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | OPERABILITY - Refueling," to be suspended in MODE 5 to allow the removal of a single CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies, provided certain specific requirements are met. In addition, an ACTION (ITS 3.10.5 ACTION A) has been added to cover the condition when one or more of the requirements of LCO 3.10.5 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the removal of a single control rod with certain LCOs not met. | | | |
| 3.10.6 L.1 | CTS 3.10.E requires the reactor mode switch to be "locked" in the "Refuel" position during extended core and control rod drive maintenance. ITS 3.10.6 requires the unit to be in MODE 5, which is defined in ITS Table 1.1-1 as having the reactor mode switch in the shutdown or refuel position with one or more reactor vessel head closure bolts less than fully tensioned. This changes the CTS by deleting the requirement to "lock" the reactor mode switch in the "Refuel" position and will also allow the reactor mode switch to be placed in the "Shutdown" position. | None | 3.10.E | 1 |
| 3.10.7 L.1 | The CTS does not provide any specific requirements for control rod testing during MODES 1 and 2. ITS LCO 3.10.7 allows the requirements of LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM demonstrations, control rod scram time testing, and control rod friction testing, provided the bank position withdrawal sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, "Control Rod Block Instrumentation," Function 2 are suspended, and conformance to the approved control rod sequence for the specified | 3.10.7 | None | 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | test is verified by a second licensed operator or other qualified member of the technical staff. In addition, an ACTION (ITS 3.10.7 ACTION A) has been added to cover the condition when requirements of LCO 3.10.7 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the Rod Pattern Control Specification to be suspended during the specified testing. | | | |
| 3.10.8<br>L.1 | The CTS does not provide any specific requirements for performing a SDM test in MODE 5. ITS LCO 3.10.8 allows the reactor mode switch position specified in Table 1.1-1 for MODE 5 to be changed to include the startup/hot standby position, and operation considered not to be in MODE 2, to allow SDM testing, provided certain requirements are met. In addition, ACTIONS (ITS 3.10.8 ACTIONS A and B) have been added to cover the condition when one or more of the requirements of LCO 3.10.8 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing SDM testing to be performed in MODE 5, by placing the reactor mode switch in startup/hot standby position, and operation not to be considered in MODE 2, provided certain requirements are met. | 3.10.8 | None | 1 |
| 4.0 | No L-Changes | N/A | N/A | N/A |
| 5.2<br>L.1 | CTS 6.1.C.4 requires an individual qualified in radiation protection procedures to be onsite when fuel is in the reactor. ITS 5.2.2.c includes the same requirement, but allows the position to be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is take to fill the required position. This changes the CTS by allowing the radiation protection technician position to be vacant for a short time due to unexpected | 5.2.2.c | 6.1.C.4 | 1 |

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | circumstances. | | | |
| 5.2<br>L.2 | CTS 6.1.F provides specific details concerning working hour limits for unit staff who perform safety related functions. These details include the normal working hours in a week, the number of hours allowed to work in a continuous period, the number of hours allowed to work in a 24 hour and 48 hour period, the number of hours for a work period break, and that overtime should be evaluated on an individual basis, not an entire staff basis, except during an extended shutdown. ITS 5.2.2.d requires procedures to be developed and implemented to limit the number of working hours for personnel who perform safety related functions, but does not include these specific details. This changes the CTS by deleting these working hour-related details. | 5.2.2.d | 6.1.F | 1 |
| 5.5<br>L.1 | CTS 4.7.B.2.a, in part, requires the performance of an in-place DOP test of the SGT System HEPA filter banks, an in-place test of the SGT charcoal adsorber banks, and a laboratory analysis of a carbon test sample from the SGT charcoal adsorber at least once per 720 hours of system operation. ITS 5.5.6 does not require the in-place DOP test of the HEPA filter banks or an in-place test of the charcoal adsorber bank at least once per 720 hours of system operation. This changes the CTS by deleting the test requirements to perform an in-place DOP test of the HEPA filter banks and an in-place test of the charcoal adsorber banks every 720 hours of system operation. | None | 4.7.B.2.a | 7 |
| 5.5<br>L.2 | CTS 4.9.B.3.b.3) requires a sample and check for quality of the diesel fuel every month. Currently, this is met by performing a viscosity check and a water and sediment check. ITS 5.5.8.c only requires total particulate concentration of the fuel oil to be tested every 31 days. This changes the CTS by deleting the monthly viscosity and water and sediment checks of stored fuel oil. | 5.5.8.c | 4.9.B.3.b.3) | 7 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| 5.5<br>L.3 | CTS 4.17.B.2.a.(4) requires the CREF System to be initiated "from the control room" with a flow of 1000 cfm (± 10%). ITS SR 5.5.6.a and 5.5.6.b do not specify how to initiate the system. This changes the CTS by deleting the requirement to start the system from the control room. | 5.5.6.a, 5.5.6.b | 4.17.B.2.a.(4) | 6 |
| 5.5<br>L.4<br>BSI 7 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS 6.8.B includes the Primary Coolant Sources Outside Containment program requirements. The Combustible Gas Control System is included in this program. ITS 5.5.2 includes the same program requirements for the Primary Coolant Sources Outside Containment Program, except the Combustible Gas Control System is not included in the program. This changes the CTS by deleting the program requirement for the Combustible Gas Control System in the Primary Coolant Sources Outside Containment Program. | 5.5.2 | 6.8.B | Note 1 |
| 5.5<br>L.5<br>BSI 8 | *** THIS ITEM IS A BSI ***<br>*** Please see separate safety review and safety evaluation ***<br><br>CTS 6.8.B.2 specifies that the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident must be performed at a refueling cycle interval or less. CTS 6.8.B also states that CTS 4.0.B is applicable (i.e., a 25% grace period is allowed). ITS 5.5.2.b specifies that the same test must be performed at least once per 24 months and ITS 5.5.2 states that the provisions of ITS SR 3.0.2 are applicable. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., the current Monticello frequency for | 5.5.2.b | 6.8.B.2 | Note 1 |

Table L - Less Restrictive Changes

| ITS/CTS No. and DOC No. | Description of Change | ITS Requirement | CTS Requirement | Change Category |
|---|---|---|---|---|
| | this test, based on the previous refueling outage interval) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in ITS SR 3.0.2). | | | |
| 5.6<br>L.1 | CTS 6.7.A.1 contains requirements for submitting a report of plant startup and power escalation testing following: a) receipt of an operating license; b) amendment to the license involving planned increase in power level; c) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and d) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.7.A.1. | None | 6.7.A.1 | 8 |
| 5.6<br>L.2 | CTS 6.7.C.2 specifies requirements for other Environment Reports (non-radiological, non-aquatic). ITS 5.6 does not include this reporting requirement. This changes the CTS by deleting the requirement of other Environmental Reports (non-radiological, non-aquatic). | None | 6.7.C.2 | 8 |

<u>Change Categories:</u>

1 - Relaxation of LCO Requirements
2 - Relaxation of Applicability
3 - Relaxation of Completion Time
4 - Relaxation of Required Action
5 - Deletion of Surveillance Requirement
6 - Relaxation of Surveillance Requirement Acceptance Criteria
7 - Relaxation of Surveillance Frequency, Non-24 Month Type Change
8 - Deletion of Reporting Requirements
9 - Deletion of Surveillance Requirement Shutdown Performance Requirement
10 - Changing Instrumentation Allowable Values

Table L - Less Restrictive Changes

Note 1 - The Less Restrictive Changes for Chapter 1.0 did not fall into any of the categories listed above. A Specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Chapter 1.0.

Note 2 - The Less Restrictive Changes for Section 3.0 did not fall into any of the categories listed above. A Specific Determination of No Significant Hazards Consideration was written for each Less Restrictive Change in Section 3.0.

Note 3 - Certain Less Restrictive Changes for Section 3.3 did not fall into any of the categories listed above. A Specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Section 3.3.

Note 4 - Certain Less Restrictive Changes for Chapter 5.0 did not fall into any of the categories listed above. A Specific Determination of No Significant Hazards Consideration was written for each non-categorized Less Restrictive Change in Chapter 5.0.


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ATTACHMENT 5

Table LA - Removed Details


DRAFT

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **1.0 LA.1** | **1.0.Y** | **The CTS 1.0.Y definition of Shutdown states that with the reactor mode switch in Shutdown, "a reactor scram is initiated...directly from the mode switch. The scram can be reset after a short time delay." ITS Table 1.1-1 does not include this additional design information.** | **3.3.3.1 Bases** | **ITS 5.5.9** | **1** |
| **2.0** | **None** | **No LA Changes** | **N/A** | **N/A** | **None** |
| **3.0 LA.1** | **4.0.B** | **CTS 4.0.B states that the purpose of the 25% extension of the specified surveillance interval is "to accommodate normal test schedule." ITS SR 3.0.2 does not include this detail.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.1.1 LA.1** | **3.3.A.1** | **CTS 3.3.A.1 states, in part, that the core loading shall be limited to that which can be made subcritical "in the most reactive condition during the operating cycle." ITS LCO 3.1.1 requires SDM to be met. This changes the CTS by relocating the details that the core loading shall be limited to that which can be made subcritical "in the most reactive condition during the operating cycle" to the ITS Bases in the form of a discussion about how core reactivity varies during the fuel cycle and that the SDM verification should consider this behavior.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.1.1 LA.2** | **4.3.A.1** | **CTS 4.3.A.1 states, in part, "Sufficient control rods shall be withdrawn . . . to demonstrate" reactivity margin is within the specified limit. ITS SR 3.1.1.1 states "Verify SDM to be within limits," but does not provide similar details of how to perform the verification. This changes the CTS by relocating the test method "Sufficient control rods shall be withdrawn … to demonstrate" reactivity margin to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| 3.1.2<br>LA.1 | 3.3.E,<br>4.3.E | CTS 3.3.E states, in part, "At a specific steady state base condition" the reactor actual control rod inventory will be periodically compared to a "normalized computed" prediction of the inventory. CTS 3.3.E also implies that the reactivity difference shall be shall be within ± 1% Dk/k. CTS 4.3.E states, in part, the actual rod inventory shall be compared to a "normalized computed" prediction of inventory and that "These comparisons will be used as base data for reactivity monitoring during subsequent power operation throughout the fuel cycle." Furthermore, the actual rod configuration will be compared to the configuration expected "based upon appropriately corrected past data." ITS LCO 3.1.2 states "The reactivity difference between the monitored control rod inventory and the predicted control rod inventory shall be within ± 1% Dk/k." ITS SR 3.1.2.1 states "Verify core reactivity difference between the monitored control rod inventory and the predicted control rod inventory is within ± 1% Dk/k." This changes the CTS by relocating these details for performing the reactivity anomaly Surveillance to the ITS Bases. | Bases | ITS 5.5.9 | 3 |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.1.3 LA.1** | **3.3.A.2.(a), 3.3.B.1** | **CTS 3.3.A.2.(a) states, in part, the "directional control valves" for inoperable control rods shall be disarmed "electrically." CTS 3.3.B.1 states, in part, each control rod shall be coupled to its drive or completely inserted and the "directional control valves" disarmed "electrically." ITS 3.1.3 ACTION A covers the condition of one withdrawn control rod stuck. ITS 3.1.3 Required Action A.2 states "Disarm the associated control rod drive (CRD)." ITS 3.1.3 ACTION C covers the condition of one or more control rods inoperable for reasons other than a stuck rod. ITS 3.1.3 Required Action C.2 states "Disarm the associated CRD." Neither of these two Required Actions provides specific details of how to disarm the CRD. This changes the CTS by relocating the details that the "directional control valves" are disarmed "electrically" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.1.5 LA.1** | **3.3.D** | **CTS 3.3.D states, in part, that if a control rod with an inoperable accumulator is inserted full-in and either its "directional control valves are electrically "disarmed" or it is hydraulically isolated," it shall not be considered to have an inoperable accumulator. ITS 3.1.3 ACTION C covers the compensatory actions for one or more inoperable control rods (control rods inoperable as a result of an inoperable accumulator is covered by this condition when declared inoperable) ITS 3.1.3 Required Action C.2 states "Disarm the associated CRD," but does not provide the specific details of how to disarm the CRD. This changes the CTS by relocating the details that the "directional control valves are electrically" disarmed "or it is hydraulically isolated" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.1.6 LA.1** | **3.3.B.3.(a)** | **CTS 3.3.B.3.(a) states "Control rod withdrawal sequences shall be established so that the maximum calculated reactivity that could be added by dropout of any increment of any one control blade will not make the core more than 1.3% Dk supercritical." ITS LCO 3.1.6 states "OPERABLE control rods shall comply with the requirements of the banked position withdrawal sequence (BPWS)." This changes the CTS by relocating the details of the system design of control rod withdrawal sequences to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.1.7<br>LA.1** | **4.4.A.2.a, 4.4.A.2.b** | **CTS 4.4.A.2.a states "Manually initiate" one of the two standby liquid control systems "and pump demineralized water" into the reactor vessel. It further states that "This test checks explosion of the charge associated with the tested system, proper operation of the valves" and that both SLC subsystems shall be tested "and inspected, including each explosion valve." CTS 4.4.A.2.b states "Explode one of the primer assemblies manufactured in the same batch to verify proper function. Then install, as a replacement, the second primer assembly in the explosion valve of the system tested for operation." ITS SR 3.1.7.8 requires verification of flow through one SLC subsystem from pump into reactor pressure vessel. This changes the CTS by relocating the above procedural details concerning performance of the flow path test to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.1.7 LA.2** | **3.4.B.1, Figure 3.4-1** | **CTS 3.4.B.1 states Equation 1 is consistent with the "Original Design Basis" and Equation 2 is consistent with the "ATWS Design Basis." CTS Figure 3.4-1 specifies that the curves are based on "B-10 Enrichments Greater than 55.0%." ITS Figure 3.1.7-1 includes the same requirements as CTS Figure 3.4-1, except the detail concerning the B-10 enrichment. ITS Table 3.1.7-1 includes Equation 1 and Equation 2, however the statements concerning the "Original Design Basis" and "ATWS Design Basis" are not included. This changes the CTS by relocating these details to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.1.7 LA.3** | **4.4.B.1** | **CTS 4.4.B.1 requires the boron enrichment to be determined by "laboratory analysis." ITS SR 3.1.7.10 does not specify the method that shall be used to determine the B-10 enrichment. This changes the CTS by relocating the procedure detail "laboratory analysis" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.2.1<br>LA.1** | **3.11.A** | **CTS 3.11.A specifies the limits for APLHGRs for "two loop" and "one loop" operation.<br><br>For two loop operation, the APLGHR limits are specified "for each type of fuel as a function of average planar exposure." For one loop operation, the APLGHR limits are specified "for each type of fuel" and shall not exceed<br>"the most limiting of<br>a. The above values multiplied by 0.80 for GE11 and GE12 fuel and 0.90 for GE14 fuel, or<br>b. The above values multiplied by the appropriate flow and power dependent correction factors provided in the Core Operating Limits Report."<br><br>In addition CTS 4.11.A states the APLHGR "for each type of fuel as a function of average planar exposure" shall be determined.<br><br>ITS 3.2.1 states "All APLHGRs shall be less than or equal to the limits specified in the COLR."<br><br>ITS SR 3.2.1.1 requires verification of all APLGHRs are less than or equal to the limits specified in the COLR.<br><br>This changes the CTS by relocating the details of what multipliers to use based on what fuel is being** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.2.1 LA.2** | **3.11.A** | **CTS 3.11.A states "When hand calculations are required, the APLHGR for each type of fuel as a function of average planar exposure shall not exceed the limiting value for the most limiting lattice (excluding natural uranium) provided in the Core Operating Limits Report." ITS LCO 3.2.1 states "All APLHGRs shall be less than or equal to the limits specified in the COLR." This changes the CTS by relocating the hand calculation APLHGR limits to the COLR.** | **COLR** | **ITS 5.6.3** | **5** |
| **3.2.1 LA.3** | **3.11.A** | **CTS 3.11.A states that if at any time during power operation it is determined that the APLHGR limiting condition for operation is being exceeded, "action shall be initiated within 15 minutes to restore operation to within the prescribed limits." ITS 3.2.1 does not include this 15 minute action. This changes the CTS by relocating the procedural detail that "action shall be initiated within 15 minutes to restore operation to within the prescribed limits" to the Bases in the form of a discussion that "prompt action should be taken to restore the APLHGR(s) to within the required limits."** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.2.2 LA.1** | **3.11.C** | **CTS 3.11.C states that if at any time during power operation it is determined that the limiting value for MCPR is being exceeded, "action shall be initiated within 15 minutes to restore operation to within the prescribed limits." ITS 3.2.2 does not include this 15 minute action. This changes the CTS by relocating the procedural detail that "action shall be initiated within 15 minutes to restore operation to within the prescribed limits" to the Bases in the form of a discussion that "prompt action should be taken to restore the MCPR(s) to within the required limits."** | **Bases** | **ITS 5.5.9** | **3** |
| **3.2.3 LA.1** | **3.11.B** | **CTS 3.11.B states that if at any time during power operation it is determined that the limiting value for LHGR limiting condition for operation is being exceeded, "action shall be initiated within 15 minutes to restore operation to within the prescribed limits." ITS 3.2.3 does not include this 15 minute action. This changes the CTS by relocating the procedural detail that "action shall be initiated within 15 minutes to restore operation to within the prescribed limits" to the Bases in the form of a discussion that "prompt action should be taken to restore the LHGR(s) to within the required limits."** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.1.1 LA.1** | **3.1.A** | **CTS 3.1.A states that the RPS response time "shall not exceed 50 milliseconds." ITS SR 3.3.1.1.15 requires the RPS RESPONSE TIME to be "within limits." This changes the CTS by relocating the details of the actual response time limit to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.3.1.1 LA.2** | **3.1.A, 3.1.B, Table 3.1.1, including Note (1)** | **CTS 3.1.A states that the "minimum number of trip systems" that must be OPERABLE for the RPS Instrumentation is in Table 3.1.1 and CTS 3.1.B provides a Condition for an inoperable trip system, however no explicit actions are provided for any inoperable trip system. CTS Table 3.1.1 Note (1) states that there shall be two operable or tripped trip systems for each function. In addition, CTS Table 3.1.1 provides a requirement for the "Total No. of Instrument Channels Per Trip System" for each RPS Instrumentation Trip Function. ITS 3.3.1.1 does not include these details. This changes the CTS by moving the information of the required number of OPERABLE trip systems and the "Total No. of Instrument Channels per Trip System" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.1.1 LA.3** | **Table 3.1.1 Trip Functions 3.a and 4.a** | **CTS Table 3.1.1 states that the Neutron Flux IRM - High High (Trip Function 3.a) Limiting Trip Setting is ≤ 120/125 of full scale AND "< 20% of Rated Thermal Power." The CTS Table 3.1.1 Flow Referenced Neutron Flux APRM High High (Trip Function 4.a) Limiting Trip Setting provides a flow reference setting as a function of "W" and states "W=percent of recirculation drive flow to produce a core flow of 57.6 ´ $10^6$ lbm/hr." ITS Table 3.3.1.1-1 Function 1.a provides the Allowable Value for the IRM Neutron Flux - High High Function, but does not include the "< 20% of Rated Thermal Power" portion of the Allowable Value. ITS Table 3.3.1.1-1 Function 2 provides the flow referenced equation for the APRM Flow Reference Neutron Flux - High High Function, however the definition of "W" is not retained. This changes the CTS by moving the details of the definition of "W" and the "20% of Rated Thermal Power" requirement to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.1.1 LA.4** | **Table 3.1.1 Notes (2) and (5)** | **CTS Table 3.1.1 Note (2) states that a Neutron Flux IRM (Trip Function 3) channel is considered to be OPERABLE if "its detector is fully inserted." CTS Table 3.1.1 Note (5) states that a Flow Referenced Neutron Flux APRM (Trip Function 4) channel is considered to be operable if "2 LPRM inputs per level and at least a total of 14 LPRM inputs, except that channels 1, 2, 5, and 6 may lose all LPRM inputs from the companion APRM Cabinet plus one additional LPRM input and still be considered operable." ITS 3.3.1.1 does not include these details. This changes the CTS by relocating the details for meeting TS requirements to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.3.1.1 LA.5** | **Table 3.1.1 Note (8)** | **CTS Table 3.1.1 Trip Function 8 provides the Limiting Trip Setting for the Scram Discharge Volume High level channels. CTS Table 3.1.1 Note (8) states that the Limiting Trip Setting for the Scram Discharge Volume High Level channels refers to the volume of water in the discharge volume receiver tank and does not include the volume in the lines to the level switches. ITS Table 3.3.1.1-1 Function 7 provides the Allowable Value for this Function and does not include these details. This changes the CTS by relocating the details for meeting TS requirements to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.1.1 LA.6** | **Table 4.1.2 Group column** | **CTS Table 4.1.2 defines the "Group" each RPS Instrumentation Function is assigned. The Table defines two groups. Group A is defined as "Passive type devices" and Group B is defined as "Vacuum tube or semiconductor devices and detectors that drift or lose sensitivity." ITS 3.3.1.1 does not include this information. This changes the CTS by relocating the design details associated with the RPS Instrumentation "Groups" to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **3.3.1.1 LA.7** | **Table 4.1.2 (for APRM), including Note (4)** | **CTS Table 4.1.2 specifies that the calibration method for the APRM test is a heat balance. CTS Table 4.1.2 Note 4 also states that this test is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 does not include the method for performing the Surveillance. This changes the CTS by relocating the procedural details for meeting TS requirements to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.3.1.2 LA.1** | **3.10.B.1** | **CTS 3.10.B.1 requires SRMs be inserted to normal operating level. ITS 3.3.2.1 does not specify the level to which SRMs are required to be inserted. This changes the CTS by moving the information of the SRM insertion level to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **2** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.2.1 LA.1** | **Table 3.2.3** | **CTS Table 3.2.3 for Rod Block instrumentation Functions includes the column "Total No. of Instrument Channels per Trip System." ITS Table 3.3.2.1-1 does not retain this column. This changes the CTS by moving the information of the "Total No. of Instrument Channels per Trip System" column to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.3.2.1 LA.2** | **Table 3.2.3 Note (5)** | **CTS Table 3.2.3 Note (5) specifies that the RBM channel is inoperable if there are less than half the total number of normal inputs. ITS Table 3.3.2.1-1 does not retain this information. This changes the CTS by moving the specific conditions of RBM OPERABILITY to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.3.2.1 LA.3** | **4.3.B.3.(a)(ii), 4.3.B.3.(a)(iii), 4.3.B.3.(a)(iv)** | **CTS 4.3.B.3.(a)(ii) states that "The rod worth minimizer computer on-line diagnostic test shall be successfully completed." CTS 4.3.B.3.(a)(iii) states that "Proper annunciation of the selection error of at least one out-of-sequence control rod in each fully inserted group shall be verified." CTS 4.3.B.3.(a)(iv) specifies that the rod worth minimizer rod block function be verified "by attempting to withdrawal an out-of-sequence control rod beyond the block point." The ITS does not include these requirements. This changes the CTS by moving the specific details for performing rod worth minimizer testing to the ITS Bases.** | **Bases** | **ITS 5.5.8** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.3.1 LA.1** | **3.14.1 Required Condition D** | **CTS Table 3.14.1 Required Condition D requires immediate initiation of the preplanned alternate method of monitoring the appropriate parameters if the number of OPERABLE channels is less than the minimum number of channels (i.e., both of the channels are inoperable). The ITS does not include this requirement. This changes the CTS by moving this detail to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.3.3.2 LA.1** | **4.13.A.2** | **CTS 4.13.A.2 requires verification that the Alternate Shutdown System panel master transfer switch alarms in the control room when unlocked once per operating cycle. ITS SR 3.3.3.2.2 does not include the specifics of how to functionally test the Alternate Shutdown System panel master transfer switch (i.e., verifies it alarms in the control room when unlocked). This changes the CTS by relocating this specific detail to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.3.3.2 LA.2** | **3.13.A.3** | **CTS 3.13.A.3 requires the Alternate Shutdown System panel master transfer switch to be locked in the normal position, except when in use, being tested, or being maintained. ITS 3.3.3.2 does not retain this information. This changes the CTS by moving the specific conditions of Alternate Shutdown System OPERABILITY to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.4.1 LA.1** | **3.2.F, Table 3.2.5, Table 4.2.1 (Recirculation Pump Trip and Alternate Rod Injection)** | **CTS 3.2.F, CTS Table 3.2.5, and CTS Table 4.2.1 provide requirements for the Alternate Rod Injection Instrumentation. ITS 3.3.4.1 does not include requirements for the Alternate Rod Injection Instrumentation. This changes the CTS by moving the explicit Alternate Rod Injection Instrumentation requirements from the Technical Specifications to the Technical Requirements Manual (TRM). The removal of these details from the Technical Specifications is acceptable because this type of information is not necessary to provide adequate protection of public health and safety.** | **TRM** | **10 CFR 50.59** | **6** |
| **3.3.4.1 LA.2** | **Table 3.2.5** | **CTS Table 3.2.5 specifies the "Minimum No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" for the ATWS-RPT Functions. ITS 3.3.4.1 does not include these details. This changes the CTS by moving the information of the "Minimum No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.5.1 LA.1** | **Tables 3.2.2 (including Notes 4 and 6) and 3.2.8** | **CTS Table 3.2.2 and CTS Table 3.2.8 specify the "Minimum No. of Operable or Operating Trip Systems" and the "Total No. of Instrument Channels Per Trip System" requirements for the ECCS Instrumentation. CTS Table 3.2.2 Note 4 states that certain instrument channels are shared by both trip systems and CTS Table 3.2.2 Note 6 states that a shared channel is considered one channel. ITS 3.3.5.1 does not include these details. This changes the CTS by moving the information of the "Minimum No. of Operable or Operating Trip Systems," "Total No. of Instrument Channels Per Trip System," and the information that the channels are shared to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.5.1 LA.2** | **Table 3.2.2 Function 3 (including Note 2), Table 4.2.1 (ECCS Instrumentation) Functions 5 and 7** | **CTS Table 3.2.2 Function 3 requires the Loss of Auxiliary Power Function to be OPERABLE. CTS Table 3.2.2 Note 2 states that the two channels associated with each trip system consists of a circuit breaker contact and an undervoltage relay. CTS Table 4.2.1 ECCS Instrumentation Function 5 requires a functional test and a calibration of the "Undervoltage Emergency Bus" channels while Function 7 requires a functional test and calibration of the "Loss of Auxiliary Power" channels. These tests are required each "Refueling Interval." These requirements are not included in ITS 3.3.5.1. This changes the CTS by moving the explicit Loss of Auxiliary Power requirements from the Technical Specifications to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |
| **3.3.5.1 LA.3** | **Table 3.2.8 Function C.1** | **CTS Table 3.2.8 specifies that the Condensate Storage Tank Low Level (Function C.1) Trip Setting is referenced from "above tank bottom." ITS Table 3.3.5.1-1 Function 3.d does not include this detail. This changes the CTS by moving the information associated with the condensate storage tank level reference point to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.5.2 LA.1** | **Table 3.2.8** | **CTS Table 3.2.8 specifies the "Minimum No. of Operable or Operating Trip System" and "Total No. of Instrument Channels Per Trip System" requirements for the RCIC System Instrumentation. ITS 3.3.5.2 does not include these details. This changes the CTS by moving the information of the "Minimum No. of Operable or Operating Trip System" and "Total No. of Instrument Channels Per Trip System" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.3.5.2 LA.2** | **Table 3.2.8 Function C.1** | **CTS Table 3.2.8 specifies that the Condensate Storage Tank Low Level (Function C.1) Trip Setting is referenced from "above tank bottom." ITS Table 3.3.5.2-1 Function 3 does not include this detail. This changes the CTS by moving the information associated with the condensate storage tank level reference point to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.6.1 LA.1** | **Table 3.2.1 (including Notes (1), (4), (6), and (7)), Table 4.2.1** | **CTS Table 3.2.1 specifies the "Total No. of Instrument Channels Per Trip System" for each Primary Containment Isolation Function and CTS Table 3.2.1 Note (1) states that "There shall be two operable...trip systems for each function." CTS Tables 3.2.1 and 4.2.1 Functions 1, 2, 3, 4, and 5 specify the group of valves isolated by each Function (i.e., "Group 1," "Group 2," "Group 3," "Group 4," and "Group 5"). CTS Table 3.2.1 Function 1 states that Function 1 provides isolation, in part, to "Recirc Sample Line" isolation valves and Function 2 states that Function 2 provides isolation, in part, to "Sump" isolation valves. CTS Table 3.2.1 Note (4) states that for certain Functions, "All instrument channels are shared by both trip systems." Furthermore, CTS Table 3.2.1 Note (1) has a parenthetical statement that "a shared channel is considered one channel." CTS Table 3.2.1 Note (6) states that, for CTS Table 3.2.1 Function 4.c, "The four pressure switches are arranged in a one-out-of-two-twice logic, the output of the logic providing a trip signal to a single trip system for isolation." CTS Table 3.2.1 Note (7) states that, for CTS Table 3.2.1 Function 5.c, "The four pressure switches are arranged in a one-out of two-twice logic, the output of the logic providing a trip signal to each of two separate trip systems. Each trip system is able, by itself, to initiate isolation." ITS 3.3.6.1 does** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.6.1 LA.2** | **Table 4.1.2 Group column** | **CTS Table 4.1.2 defines the "Group" each instrumentation Function is assigned. The Table defines two groups. Group A is defined as "Passive type devices" and Group B is defined as "Vacuum tube or semiconductor devices and detectors that drift or lose sensitivity." ITS 3.3.6.1 does not include this information. This changes the CTS by relocating the design details associated with the instrumentation "Groups" to the USAR.** | **USAR** | **10 CFR 50.59,<br>10 CFR 50.71(e)** | **1** |
| **3.3.6.2 LA.1** | **Table 3.2.4 including Note (1)** | **CTS Table 3.2.4 specifies the "Minimum No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" for the Secondary Containment Isolation Instrumentation Functions. CTS Table 3.2.4 Note (1) also states that "There shall be two operable… Trip Systems for each Function." ITS 3.3.6.2 does not include these details. This changes the CTS by moving the information of the "Minimum No. of Operable or Operating Trip Systems," and "Total No. of Instrument Channels Per Trip System," columns and Note (1) information concerning the number of OPERABLE Trip Systems to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.6.3 LA.1** | **Table 3.2.7 including Notes (1), (2), and (3)** | **CTS Table 3.2.7 specifies the "Min. No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" for the S/RV LLS Instrumentation Functions. CTS Table 3.2.7 Note (1) states that the LLS and inhibit logic is provided for three S/RVs. The three valves have staggered setpoints as indicated. Table 3.2.7 Note (2) states that each valve is provided with two trip, or actuation, systems. CTS Table 3.2.7 Note (3) states the Trip Setting for the Discharge Pipe Pressure Inhibit and Position Indication Function is with respect to drywell atmosphere. This changes the CTS by moving the information of the "Min. No. of Operable or Operating Trip Systems," "Total No. of Instrument Channels Per Trip System," and the Notes to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.3.7.1 LA.1** | **Table 3.2.9** | **CTS Table 3.2.9 specifies the "Total No. of Instrument Channels per Trip System" and "Minimum No. of Trip Systems" for the Control Room Radiation - High Function. ITS 3.3.7.1 does not include these details. This changes the CTS by moving the information of the "Total No. of Instrument Channels per Trip System" and "Minimum No. of Trip Systems" columns to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.3.8.1 LA.1** | **Table 3.2.6 including Notes (2) and (3)** | **CTS Table 3.2.6 specifies the "Minimum No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" for the Degraded Voltage and Loss of Voltage Functions. In addition, CTS Table 3.2.6 Notes (2) and (3) provide details of the LOP Instrumentation trip logic (i.e., one out of two twice for the Loss of Voltage Function and two-out-of-three for the Degraded Voltage Function). ITS 3.3.8.1 does not include these details. This changes the CTS by moving the information of the "Minimum No. of Operable or Operating Trip Systems" and "Total No. of Instrument Channels Per Trip System" columns, as well as the details of the trip logic, to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.4.1 LA.1** | **3.5.F.1, 3.5.F.2, 3.5.F.4.a** | **If the Stability Exclusion Region of the power to flow map is entered, CTS 3.5.F.1 requires exiting the region by either inserting control rods or increasing the speed of an operating recirculation pump. If the Stability Buffer Region of the power to flow map is entered, CTS 3.5.F.2 requires exiting the region by the same two actions. If either region is entered as a result of both recirculation pumps tripping, CTS 3.5.F.4.a requires complying with CTS 3.5.F.1 and 2 by inserting control rods. ITS 3.4.1 Required Action A.1 requires action to be taken to restore operation to within the Normal Region of the power to flow map, but does not provide the specific details of how operation is to be restored. This changes the CTS by relocating the details that operation is restored to within the Normal Region of the power to flow map by either inserting control rods or increasing the speed of an operating pump (as applicable) to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.4.3 LA.1** | **3.6.E.1** | **CTS 3.6.E.1 states that the safety valve function "(self actuation)" of seven S/RVs shall be OPERABLE. ITS LCO 3.4.3 requires the safety function of seven S/RVs to be OPERABLE. This changes the CTS by moving the detail that the safety function of S/RVs are by "self actuation" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |


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| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.4.3 LA.2** | **4.6.E.1.a** | **CTS 4.6.E.1.a states that the S/RVs shall be "tested or replaced each refueling interval" in accordance with the Inservice Testing Program. ITS SR 3.4.3.1 requires the verification that the safety function lift setpoints of the required S/RVs are 1109 $\pm$ 33.2 psig in accordance with the Inservice Testing Program. This changes the CTS by relocating the procedural detail that the S/RVs "shall be tested or replaced each refueling interval" to the Inservice Testing Program.** | **IST Program** | **10 CFR 50.55a** | **3** |
| **3.4.3 LA.3** | **4.6.E.1.b** | **CTS 4.6.E.1.b states that "At least two of the safety/relief valves shall be disassembled and inspected each refueling interval." This changes the CTS by relocating this Surveillances Requirement to the Technical Requirements Manual.** | **TRM** | **10 CFR 50.59** | **6** |
| **3.4.3 LA.4** | **4.6.E.1.c, 4.6.E.1.d** | **CTS 4.6.E.1.c states that "The integrity of the safety/relief valve bellows shall be continuously monitored." CTS 4.6.E.1.d states that "The operability of the bellows monitoring system shall be demonstrated each operating cycle." This changes the CTS by relocating these Surveillances Requirements to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.4.9 LA.1** | **4.6.A, 4.6.B.1** | **CTS 4.6.A requires the reactor coolant temperatures at the following locations to be monitored: a. reactor vessel shell adjacent to shell flange; b. reactor vessel bottom drain; c. recirculation loops A and B; and d. reactor vessel bottom head temperatures. The temperatures are to be monitored during heatups and cooldowns "until 3 consecutive readings at each location are within 5°F." CTS 4.6.B.1 requires the RCS temperatures at the following locations to be monitored during inservice hydrostatic or leak testing: a. reactor vessel shell adjacent to shell flange; b. reactor vessel bottom head; and c. reactor vessel shell or coolant temperature representative of the minimum temperature of the beltline region. ITS SR 3.4.9.1 requires the RCS pressure, RCS temperature, and RCS heatup and cooldown rates to be within the applicable limits. This changes the CTS by relocating the details of the specific reactor coolant temperature locations that must be monitored and the criteria for ending the RCS heatup and cooldown rates verification to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3/4.6.H LA.1** | **3/4.6.H** | **CTS 3/4.6.H provides the requirements for all safety related snubbers. This Specification is not included in the ITS. This changes the CTS by moving the explicit snubber requirements from the Technical Specifications to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.5.1 LA.1** | **4.5.A.2** | **CTS 4.5.A.2 requires the demonstration that LPCI pumps develop a 3,870 gpm flow rate against a system head corresponding to "two pumps delivering 7,740 gpm" at a reactor pressure of 20 psi greater than containment pressure. ITS SR 3.5.1.7 includes the same requirement, except the detail that the system head must correspond to "two pumps delivering 7,740 gpm" is not included. This changes CTS by moving the system head correction due to two pumps operating in parallel to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.5.1 LA.2** | **4.5.A.4** | **CTS 4.5.A.4 requires the performance of an ADS Valve Operability test by cycling each ADS valve "and observing a compensatory change in turbine bypass or control valve position." ITS SR 3.5.1.12 requires the verification that each ADS valve opens when manually actuated, but does not include the method for determining that the ADS valve has opened. This changes the CTS by moving the detail that the change in turbine bypass or control valve position shall be observed during the test to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.5.1 LA.3** | **4.5.A.4** | **CTS 4.5.A.4 requires the performance of a simulated automatic actuation test of all ECCS subsystems and includes HPCI transfer to the suppression pool and automatic restart on subsequent Low Low reactor water level. ITS SR 3.5.1.10 requires the verification that each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal. This changes the CTS by moving the detail that the test verification must include "HPCI transfer to the suppression pool and automatic restart on subsequent Low Low reactor water level" to the ITS Bases. The change to allow an actual signal is discussed in DOC L.4.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.5.1 LA.4** | **4.5.A.5** | **CTS 4.5.A.5 requires the performance of an instrument check, test, and calibration of the Core Spray Dp Instrumentation. ITS 3.5.1 does not include any Surveillance Requirements for the Core Spray Dp instrumentation. This changes the CTS by relocating this Surveillance Requirement to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **4** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.5.1 LA.5** | **4.5.B.2** | **CTS 4.5.B.2 states to either close the inoperable valve or close the other Return Line isolation valve and the RHR suction line isolation valve when it is determined that one RHR intertie return line isolation valve is inoperable. ITS 3.5.1 ACTION F covers the condition for inoperable RHR intertie return line isolation valve(s) and requires isolation of the RHR intertie line. This changes the CTS by moving the details on how to isolate the line to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.5.3 LA.1** | **4.5.D.2** | **CTS 4.5.D.2 requires the performance of a simulated automatic actuation test of the RCIC System that includes RCIC transfer to the suppression pool and automatic restart on subsequent low reactor water level. ITS SR 3.5.3.4 requires the verification that RCIC actuates on an actual or simulated automatic initiation signal. This changes the CTS by moving the detail that the test verification must include "RCIC transfer to the suppression pool and automatic restart on subsequent low reactor water level" to the ITS Bases. The change to allow an actual signal is discussed in DOC L.2.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.1 LA.1** | **1.0.P** | **CTS 1.0.P definition of Primary Containment Integrity states, in part, that "Primary Containment Integrity means that the drywell and pressure suppression chamber are intact," and that "All… manways are closed." ITS 3.6.1.1 does not include these requirements. This changes the CTS by moving these requirements to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **2** |
| **3.6.1.2 LA.1** | **3.7.A.2.c** | **CTS 3.7.A.2.c states (in part) what constitutes an OPERABLE containment air lock (i.e., both doors closed except when the air lock is being used, then at least one air lock door shall be closed). ITS LCO 3.6.1.2 does not include this level of detail. This changes the CTS by moving details concerning what constitutes an OPERABLE containment air lock to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.6.1.2 LA.2** | **1.0.P.2** | **CTS 1.0.P.2 definition of Primary Containment Integrity states that "At least one door in the air lock is closed and sealed." ITS 3.6.1.2 does not include this requirement. This changes the CTS by moving these details to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **2** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.3 LA.1** | **4.7.D.1.c, 4.7.D.1.d** | **CTS 4.7.D.1.c states that "All normally open power-operated isolation valves shall be tested in accordance with the Inservice Testing Program. Main Steam isolation valves shall be tested (one at a time) with the reactor power less than 75% of rated." CTS 4.7.D.1.d states, "At least once per week the main steam line power-operated isolation valves shall be exercised by partial closure and subsequent reopening." ITS 3.6.1.3 does not include these requirements. This changes the CTS by relocating these Surveillances Requirement to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |
| **3.6.1.3 LA.2** | **3.7.D.2.a, 3.7.D.2.b, 3.7.D.3.b** | **A parenthetical phrase to CTS 3.7.D.2.a, CTS 3.7.D.2.b, and CTS 3.7.D.3.b states that "Deactivated means electrically or pneumatically disarm or otherwise secure the valve." ITS 3.6.1.3 does not define the term "de-activated." This changes CTS by moving the intent of the word "de-activated" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.3 LA.3** | **3.7.D.3.a** | **CTS 3.7.D.3.a specifies that inerting and de-inerting operations permitted by TS 3.7.A.5.b shall be via the 18 inch purge and vent valves "aligned to the Reactor Building plenum and vent." ITS SR 3.6.1.3.1 includes a Note that states that the 18 inch primary containment purge and vent valves may be opened for inerting, de-inerting, pressure control, ALARA, or air quality considerations for personnel entry, or Surveillance that require the valves to be open, but does not specify that the 18 inch purge and vent valves must be aligned to the Reactor Building Plenum and vent. This changes CTS by moving the details on how to purge and vent through the 18 inch valves to the ITS Bases. The change adding additional reasons to use the 18 inch valves are discussed in DOC L.6.** | **Bases** | **ITS 5.5.9** | **2** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.7 LA.1** | **3.7.A.4.a, 3.7.A.4.b, Figure 3.7.1** | **CTS 3.7.A.4.a requires all suppression chamber-to-drywell vacuum breakers be closed "as indicated by the position indication system."  CTS 3.7.A.4.b states that a suppression chamber-to-drywell vacuum breaker may be nonfully closed "as indicated by the position indication and alarm system provided that drywell to suppression chamber differential pressure decay does not exceed that shown on Figure 3.7.1." CTS 4.7.A.4.b states that when the position of any suppression chamber-to-drywell vacuum breaker is indicated to be not fully closed, "the drywell to suppression chamber differential pressure decay shall be demonstrated to be less than shown on Figure 3.7.1."  ITS 3.6.1.7 does not include the details for determining how the vacuum breakers are to be determined closed.  This changes the CTS by relocating these details to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.7 LA.2** | **4.7.A.4.a.(4)** | **CTS 4.7.A.4.a.(4) requires a verification that the vacuum breaker opening force not exceed an equivalent of 0.5 psid "acting on the suppression chamber face of the valve disc. (Containment access required.)" ITS SR 3.6.1.7.3 continues to require a verification that the vacuum breaker opening force is $\leq$ 0.5 psid, but the location of the force (acting on the suppression chamber face of the valve disc) is not specified. In addition, the information that performance of the SR requires containment access is also not specified. This changes the CTS by relocating these details to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.6.1.7 LA.3** | **4.7.A.4.a.(2)** | **CTS 4.7.A.4.a.(2) states, in part, that "Once each operating cycle … each vacuum breaker shall be visually inspected." ITS 3.6.1.7 does not include this requirement. This changes the CTS by relocating this Surveillance Requirement to the Technical Requirements Manual.** | **TRM** | **10 CFR 50.59** | **6** |
| **3.6.1.7 LA.4** | **3.7.A.4.d** | **CTS 3.7.A.4.d allows the suppression chamber-to-drywell vacuum breakers to be cycled, one at a time, during containment inerting and de-inerting operations "to assist in purging air or nitrogen from the suppression chamber vent header." ITS SR 3.6.1.7.1 Note 3 continues to provide the same allowance, but does not specify the purpose of the allowance. This changes the CTS by relocating this detail to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.1.8 LA.1** | **3.5.C.1** | **CTS 3.5.C.1 states that a containment spray subsystem consists of the following equipment powered from one division: 1 RHR Heat Exchanger, 1 RHR Pump, and valves and piping necessary for drywell spray. ITS 3.6.1.8 requires two RHR drywell spray subsystems to be OPERABLE, but the details of what constitutes an OPERABLE subsystem are moved to the ITS Bases. This changes the CTS by moving the details of what constitutes an OPERABLE subsystem to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.6.2.3 LA.1** | **3.5.C.1** | **CTS 3.5.C.1 states that a containment cooling subsystem consists of the following equipment powered from one division: 1 RHR Heat Exchanger, 1 RHR Pump, and valves and piping necessary for torus cooling. ITS 3.6.2.3 requires two RHR suppression pool cooling subsystems to be OPERABLE, but the details of what constitutes an OPERABLE subsystem are moved to the ITS Bases. This changes the CTS by moving the details of what constitutes an OPERABLE subsystem to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.3.1**<br>**LA.1** | **3.7.A.5.a** | **CTS 3.7.A.5.a states that the primary containment atmosphere shall be reduced to less than 4% oxygen by volume "with nitrogen gas." ITS LCO 3.6.3.1 states that primary containment oxygen concentration shall be < 4 volume percent, but does not state that it is to be done using nitrogen gas. This changes the CTS by relocating the details on how to reduce oxygen concentration (i.e., "with nitrogen gas") to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.6.4.1**<br>**LA.1** | **4.7.C.1.a** | **CTS 4.7.C.1.a requires the secondary containment capability test to maintain at least 1/4 inch of water vacuum "under calm wind (u < 5 mph) conditions." CTS 4.7.C.1.a also states "If calm wind conditions do not exist during this testing, the test data is to be corrected to calm wind conditions." ITS SR 3.6.4.1.4 includes the same test, however the wind conditions are not specified. This changes CTS by moving the details of the wind conditions to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.6.4.3**<br>**LA.1** | **3.7.B.1** | **CTS 3.7.B.1 states that two "separate and independent" Standby Gas Treatment (SGT) System trains shall be OPERABLE. ITS LCO 3.6.4.3 requires two SGT subsystems to be OPERABLE, but does not include the details of what constitutes OPERABILITY. This changes the CTS by moving the detail that the trains must be "separate and independent" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.6.4.3 LA.2** | **3.7.B.2.c** | **CTS 3.7.B.2.c requires the SGT subsystem be shown to be OPERABLE with automatic initiation upon receipt of the following inputs: Low Low Reactor Water Level; high drywell pressure; reactor building ventilation plenum high radiation; or refueling floor high radiation. ITS SR 3.6.4.3.3 requires verification that each SGT subsystem actuates on an initiation signal. This changes the CTS by moving the specific type of actuation signals to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.7.1 LA.1** | **3.5.C.1** | **CTS 3.5.C.1 states that an RHRSW subsystem consists of the following equipment powered from one division: 1 RHR Heat Exchanger, 1 RHR Service Water Pump, and valves and piping necessary for torus cooling. ITS 3.7.1 requires two RHRSW subsystems to be OPERABLE, but the details of what constitutes an OPERABLE subsystem are moved to the Bases. This changes the CTS by moving the details of what constitutes an OPERABLE subsystem to the Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.7.4 LA.1** | **4.17.B.1** | **CTS 4.17.B.1 states to "initiate from the control room" flow through CREF subsystem and operate for at least 10 hours. ITS SR 3.7.4.1 includes the same requirement, however, the statement to "initiate from the control room" is not included. This changes the CTS by moving the requirement to "initiate from the control room" from the CTS to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.7.4 LA.2** | **3.17.B.2.c.(3), 4.17.B.2.c.(3)** | **CTS 3.17.B.2.c.(3) and CTS 4.17.B.2.c.(3) require each CREF subsystem be shown to be OPERABLE with automatic initiation upon receipt of a "high radiation" signal. ITS SR 3.7.4.3 requires verification that each CREF subsystem actuates on an initiation signal. This changes the CTS by moving the specific type of actuation signal to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.8.1 LA.1** | **3.9.A.1, 3.9.A.1.c, 3.8.B.1, 4.9.A.1** | **CTS 3.9.A.1 states, in part, that two NSP transmission lines and associated switchgear must be fully operational. Furthermore, a parenthetical phrase in CTS 3.9.A.1.c states that one of the sources to the required offsite circuits is the "source from 10 transformer." CTS 3.9.B.1 provides actions to be taken when one of the two required NSP transmission lines are found to be inoperable. CTS 4.9.A.1 specifies Surveillances for the substation switchyard battery that provides control power for the NSP transmission line breakers. ITS 3.8.1 does not include any requirements for the NSP transmission lines and associated switchgear and batteries. This changes the CTS by relocating the LCO, Actions, and Surveillance Requirements for the NSP transmission lines and associated switchgear and batteries to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| 3.8.1<br>LA.2 | 3.9.A.1,<br>3.9.A.1.a,<br>3.9.A.1.b,<br>3.9.A.1.c | CTS 3.9.A.1 requires two offsite power sources to be fully operational and energized to carry power to the plant 4160 V AC buses and provides details of what constitutes an offsite power source. ITS 3.8.1 requires two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System to be OPERABLE, but the details of what constitutes an OPERABLE qualified circuit is contained in the ITS Bases. This changes the CTS by moving the details of what constitutes an OPERABLE qualified circuit to the ITS Bases. | Bases | ITS 5.5.9 | 1 |
| 3.8.1<br>LA.3 | 3.9.A.2 | CTS 3.9.A.2 specifies both diesel generators be operable and "capable of feeding their designated 4160 volt buses." ITS 3.8.1 requires both diesel generators to be OPERABLE, but the details of what constitutes an OPERABLE diesel generator is moved to the ITS Bases. This changes the CTS by moving the details of what constitutes an OPERABLE diesel generator to the ITS Bases. | Bases | ITS 5.5.9 | 1 |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.8.1 LA.4** | **4.9.B.3.b.2)** | **CTS 4.9.B.3.b.2) requires the diesel fuel oil transfer pump and diesel oil service pump to be operated. ITS SR 3.8.1.5 requires verification that the fuel oil transfer system operates to transfer fuel oil from the storage tank to the day tanks and from the day tanks to the associated base tanks. The details of what constitutes an OPERABLE diesel fuel oil transfer system is moved to the ITS Bases. This changes the CTS by moving the details of what constitutes an OPERABLE diesel generator to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.8.3 LA.1** | **3.9.B.3.b** | **CTS 3.9.B.3.b states that the minimum specified diesel fuel volume in the diesel oil storage tank is adequate to supply 7 days of operation for one EDG at full load (2500 kW). ITS 3.8.3 does not include this statement. This changes the CTS by relocating the details of the system design ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.8.4 LA.1** | **3.9.A.4, 3.9.B.5, 4.9.B.5** | **CTS 3.9.A.4 states that the 24/48 volt batteries must be charged and inservice and the associated battery chargers must be OPERABLE. CTS 3.9.B.5 provides the Actions to take when one of the two 24 V battery systems are found to be inoperable and CTS 4.9.B.5 includes Surveillance Requirements for the station 24 volt batteries. ITS 3.8.4 does not include any requirements for the station 24/48 VDC batteries or chargers. This changes the CTS by relocating the LCO, Actions, and Surveillances Requirements to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **3.8.4 LA.2** | **3.9.A.4** | **CTS 3.9.A.4, in part, requires the 125 V and 250 V batteries to be charged and in service, and the associated battery chargers to be OPERABLE. ITS LCO 3.8.4 requires the Division 1 and Division 2 125 VDC and 250 VDC electrical power subsystems to be OPERABLE. This changes the CTS by relocating the details of the system design (i.e., batteries are charged and in service and the batteries chargers are OPERABLE) ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |
| **3.8.6 LA.1** | **4.9.B.4.b** | **CTS 4.9.B.4.b requires each cell voltage to be measured "to the nearest 0.01 volt." ITS SR 3.8.6.5 requires verification that each battery connected cell voltage is within a specified limit. This changes the CTS by relocating the details that the cell voltage measurement be "to the nearest 0.01 volt" to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **3** |
| **3.8.7 LA.1** | **3.9.A.3.(a), 3.9.A.3.(b)** | **CTS 3.9.A.3.(a) requires the 4160V Buses #15 and #16 to be energized. CTS 3.9.A.3.(b) requires the 480V Buses #103 and #104 to be energized. ITS LCO 3.8.7, in part, requires the Division 1 and Division 2 AC electrical power distribution subsystems to be OPERABLE. This changes the CTS by moving the specific names of the buses, the associated nominal bus voltages (i.e., 4160 V and 480 V), and that the buses must be energized from the CTS to the ITS Bases.** | **Bases** | **ITS 5.5.9** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **ITS 3.9 / CTS 3.10.D LA.1** | **3.10.D** | **CTS LCO 3.10.D requires the reactor to be subcritical for a minimum of 24 hours prior to movement of fuel within the reactor. The ITS does not include the requirements for decay time. This changes the CTS by moving the explicit decay time requirements from the Technical Specifications to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **6** |
| **3.10** | **None** | **No 3.10 R-Changes** | **None** | **None** | **None** |
| **4.0 LA.1** | **5.1** | **CTS 5.1 provides details describing the site location and property lines. The ITS does not contain these details. This changes the CTS by moving the details of the site location and property to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **4.0 LA.2** | **5.2.B** | **CTS 5.2.B states that the control rod material shall be boron carbide "powder ($B_4C$) compacted to approximately 70% of theoretical density" or hafnium. ITS 4.2.2 states the control material shall be boron carbide or hafnium metal as approved by the NRC. This changes the CTS by moving the detailed description of the boron carbide control rod material to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **4.0 LA.3** | **5.3** | **CTS 5.3 includes some design details of the reactor pressure vessel and the reactor recirculation system. The ITS does not contain this information. This changes the CTS by moving the description of the design details of the reactor pressure vessel and the reactor recirculation system to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **4.0 LA.4** | **5.4** | **CTS 5.4 describes the various design features of the primary and secondary containments. The ITS does not contain this information. This changes the CTS by moving the description of the design feature of the containment to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **4.0 LA.5** | **5.5.A** | **CTS 5.5.A states, in part, that normal storage for unirradiated fuel assemblies is in critically-safe new fuel storage racks in the reactor building storage vault. The ITS does not contain this information. This changes the CTS by moving the detail of the location where normal storage for unirradiated fuel assemblies is stored to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **4.0 LA.6** | **5.6** | **CTS 5.6 describes certain general seismic design requirements for Class 1 structures and equipment. The ITS does not contain this information. This changes the CTS by moving the description of these general seismic design requirements to the USAR.** | **USAR** | **10 CFR 50.59, 10 CFR 50.71(e)** | **1** |
| **5.1 LA.1** | **6.1.A** | **CTS 6.1.A uses the title "Shift Supervisor." ITS 5.1.2 uses the generic title "shift supervisor." This changes the CTS by moving the specific Monticello organizational title to the USAR or Operational Quality Assurance Plan (OQAP) and replacing it with a generic title.** | **USAR or OQAP** | **10 CFR 50.59, 10 CFR 50.71(e), 10 CFR 50.54 (a)** | **3** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **5.2 LA.1** | **6.1.C.1, Table 6.1.1, including Notes 2, 3, and 4** | **CTS 6.1.C.1 and Table 6.1.1, including Notes 2, 3, and 4, provide minimum shift crew composition requirements. ITS 5.2.2 only includes the minimum shift crew composition requirements that are not already included in 10 CFR 50.54. This changes the CTS by moving the minimum shift crew composition requirements addressed by 10 CFR 50.54 to the Technical Requirements Manual (TRM).** | **TRM** | **10 CFR 50.59** | **3** |
| **5.3 LA.1** | **6.1.C.8, 6.1.D** | **CTS 6.1.C.8 states that the licensed Senior Operator and Operator training program be accredited by the National Nuclear Accrediting Board. CTS 6.1.D states that the training program be under the direction of a designated member of Nuclear Management Company, LLC management. These requirements are not retained in the ITS. This changes the CTS by moving the requirements for the training program to the USAR.** | **USAR** | **10 CFR 50.59,<br>10 CFR 50.71(e)** | **6** |

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type (see last page) |
|---|---|---|---|---|---|
| **5.5 LA.1** | **6.8.G** | **CTS 6.8.G states that the Inservice Testing Program provides controls for inservice testing of Quality Group A, B, and C pumps and valves which shall be performed in accordance with the requirements of ASME Code Class 1, 2, and 3 pumps and valves, respectively. ITS 5.5.5 only states that the Inservice Testing Program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves. This changes the CTS by moving these procedural details that the "Quality Group A, B, and C pumps and valves" corresponds to the ASME Code Class 1, 2, and 3 pumps and valves, respectively, from the Technical Specifications to the Inservice Testing Program.** | **IST Program** | **10 CFR 50.55a** | **3** |
| **5.6 LA.1** | **6.7.A.7.b** | **CTS 6.7.A.7.b specifies the revision/supplement numbers and dates (e.g., latest approved version at the time the reload analyses are performed) of the referenced methodologies used for the development of the COLR. ITS 5.6.3.b does not contain this level of detail. This changes the CTS by moving the specific methodology references for revisions/supplements and dates to the COLR.** | **COLR** | **ITS 5.6.3** | **3** |

**<u>Change Types (only applicable to LA DOCs):</u>**

**1 - Removing Details of System Design and System Description, including Design Limits**

**2 - Removing Descriptions of System Operation**

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

**4 - Removing Performance Requirements for Indication-Only Instrumentation and Alarms**
**5 - Removal of Cycle-Specific Parameter Limits from the Technical Specifications to the COLR**
**6 - Removal of LCO, SR, or other TS Requirement to the TRM, USAR, ODCM, OQAP, IST Program, or IIP**

# ATTACHMENT 6

## Table R - Relocated Specifications



| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type |
|---|---|---|---|---|---|
| 3.3.1.1<br>R.1 | 3.1.A, Table 3.1.1 Trip Function 9, Tables 4.1.1 and 4.1.2<br><br>(for Condenser Low | CTS 3.1.A requires the RPS Turbine Condenser Low Vacuum Trip Function (CTS Table 3.1.1 Trip Function 9) to be OPERABLE while CTS 4.1.A requires the RPS Turbine Condenser Low Vacuum Trip Function channels to be functional tested and calibrated as indicated in Table 4.1.1 and 4.1.2, respectively. The turbine condenser low vacuum scram is provided to protect the main condenser from | TRM | 10 CFR 50.59 | N/A |

Table R - Relocated Specifications

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type |
|---|---|---|---|---|---|
| | Vacuum channels) | overpressurization in the event that vacuum is lost. A loss of condenser vacuum would cause the turbine stop valves to close, resulting in a turbine trip transient. The low condenser vacuum trip anticipates this transient and scrams the reactor. No DBA or transient takes credit for this scram signal. This specification does not meet the criteria for retention in the ITSs; therefore, it will be retained in the TRM. | | | |
| 3.3.3.1<br>R.1 | Tables 3.14.1 and 4.14.1<br><br>(for Safety/Relief Valve Position (pressure switches and thermocouples), Offgas Stack Wide Range Radiation, and Reactor Building Vent Wide Range Radiation) | CTS Tables 3.14.1 and 4.14.1 provide requirements for Post-Accident Monitoring Instrumentation channels. Each individual post accident monitoring parameter has a specific purpose; however, the general purpose for all accident monitoring instrumentation is to ensure sufficient information is available following an accident to allow an operator to verify the response of automatic safety systems, and to take preplanned manual actions to accomplish a safe shutdown of the plant. The NRC position on application of the screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 9, 1988 from T.E. Murley (NRC) to W.S. Wilgus (B&W Owners Group). The screening criteria are now incorporated into 10 CFR 50.36(c)(2)(ii). The NRC position taken was that the PAM instrumentation table list should contain, on a plant specific basis, all RG 1.97 Type A instruments specified in the plant's SER on RG 1.97, and all RG 1.97 Category 1 instruments. Accordingly, this position has been applied to the Monticello RG 1.97 instruments.<br><br>Those instruments meeting these criteria have remained in TSs. The instruments not meeting these criteria will be relocated from the TSs to the TRM. Changes to the TRM will be controlled by the provisions of | TRM | 10 CFR 50.59 | N/A |

Table R - Relocated Specifications

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type |
|---|---|---|---|---|---|
| | | 10 CFR 50.59. | | | |
| 3.5.1<br>R.1 | 4.5.A.4 | CTS 4.5.A.4 requires the performance of an ADS Inhibit Switch Operability test. This implies that ADS OPERABILITY includes the ADS Inhibit Switch Function. The ADS Inhibit Switch allows the operator to defeat ADS actuation, as directed by the emergency operating procedures, under conditions for which ADS actuation would not be desirable. For example, during an ATWS event, low pressure ECCS activation would dilute sodium pentaborate injected by the SLC system, thereby reducing the effectiveness of the SLC system to shut down the reactor. This SR does not meet the criteria for retention in the ITSs; therefore, it will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.<br><br>While 10 CFR 50.36(c)(2) criteria are not normally used for an individual SR, they are used in this case since the previous STS included the ADS Manual Inhibit Switch as a separate specification and the NRC evaluated it as such as documented in the NRC Staff Review of NSSS Vendor Owners Groups Application of the Commissions Interim Policy Criteria to Standard Technical Specifications, letter dated May 9, 1988. | TRM | 10 CFR 50.59 | N/A |
| 3/4.6.C.2,<br>3/4.6.C.3,<br>3/4.6.C.4<br><br>R.1 | 3/4.6.C.2,<br>3/4.6.C.3,<br>3/4.6.C.4 | CTS 3/4.6.C.2 and CTS 3/4.6.C.3 provide the requirements on the conductivity and chloride ion content in the RCS, and CTS 3/4.6.C.4 provides the Actions if CTS 3/4.6.C.2 or CTS 3/4.6.C.3 are not met. Poor coolant water chemistry contributes to the long-term degradation of system materials of construction, and thus is not of immediate importance to the unit operator. Reactor coolant water chemistry is monitored for a variety of reasons. One reason is to reduce the possibility of failures in the RCS pressure boundary caused by | TRM | 10 CFR 50.59 | N/A |

Table R - Relocated Specifications

| ITS/CTS No. and DOC No | CTS Requirement | Description of Relocated Requirement | Location | Change Control Process | Change Type |
|---|---|---|---|---|---|
| | | corrosion. However, the chemistry monitoring activity is of a long term preventative purpose rather than mitigative. This specification does not meet the criteria for retention in the ITSs; therefore, it will be retained in the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. | | | |
| 3.3.2.1<br><br>R.1 | 3.2.C.1, Tables 3.2.3 and 4.2.1<br><br>(for SRM, IRM, APRM, and Scram Discharge Volume Rod Block Functions) | CTS 3.2.C.1 and CTS Tables 3.2.3 and 4.2.1, in part, specify the limiting conditions of operation, associated Actions, and Surveillance Requirements for the SRM, IRM, APRM, and SDV rod block functions.<br><br>The SRM, IRM, APRM, and SDV rod blocks are intended to prevent rod withdrawal when plant conditions make such withdrawal imprudent.<br><br>There are no safety analyses that depend on these rod blocks to prevent, mitigate, or establish initial conditions for a DBA or transient. The evaluation summarized in NEDO-31466 determined that the loss of SRM, IRM, APRM, and SDV rod blocks would be a non-significant risk contributor to CDF and offsite releases.<br><br>Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met, the SRM, IRM, APRM, and SDV rod block LCOs and associated surveillances may be relocated out of the TSs. The SRM, IRM, APRM, and SDV rod blocks will be relocated to the TRM. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. | TRM | 10 CFR 50.59 | N/A |