ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
1.0 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 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 are 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 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: 1. MODE 1 (Power Operation) is when the reactor mode switch is in the Run position; 2. 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; 3. MODE 3 (Hot 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 > 212/F; 4. MODE 4 (Cold Shutdown) is when the reactor mode switch is in the Shutdown position,	1.1, Table 1.1-1	1.0.B, 1.0.K, 1.0.O, 1.0.Y

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	all reactor vessel head closure bolts are fully tensioned (footnote (a)) and the average reactor coolant temperature is ≤ 212/F; and 5. 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)). This changes the CTS in several ways: 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. 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. 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. 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 in Shutdown and (as described in part 2 of the CTS definition) the average reactor coolant temperature is ≤ 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. 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.		

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2.0	None	N/A	N/A
3.0 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 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
3.0 M.3	CTS 3.6.H.2 provides the action for inoperable snubbers, and requires one of the following be performed within 72 hours when one or more snubbers are inoperable: a) replace or restore the inoperable snubbers to OPERABLE status and perform an engineering evaluationor inspection of the supported components; b) determine through an engineering evaluation that the as-found condition of the snubber had no adverse effect on the supported components and that they would retain their structural integrity in the event of a design basis seismic event; or c) declare the supported system inoperable and take the action required by the Technical Specifications for inoperability of that system. In the ITSs, the actions for inoperable snubbers are incorporated into ITS LCO 3.0.8. When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met soley for this reason if the risk is assessed and managed, and either: a) the snubbers not able to perform their associated support function(s) are associated with only one subsystem or are associated with a single subsystem supported system and are able to perform their associated support function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one subsystem of a multiple subsystem supported system and are able to perform their associated support function within 12 hours. At the end of the specified period (i.e. 12 hours or 72 hours), snubbers must be able to perform their associated function(s) or the affected system LCO(s) shall be declared not to be met.	LCO 3.0.8	3.6.H.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	This changes the CTSs by requiring the risk associated with inoperable snubbers to be assessed and managed, and requires the snubbers be restored to OPERABLE status in all cases, and in certain cases within a more restrictive Completion Time.		
3.1.1 M.1	CTS 4.3.A.1 states, in part, reactivity margin of "0.25 per cent Δk" is required. ITS LCO 3.1.1 states SDM shall be: a. ³ 0.38% $\Delta k/k$, with the highest worth control rod analytically determined; or b. ³ 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
3.1.1 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, 3.3.G.1, 3.3.G.2
3.1.1 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 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 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	3.1.1 ACTIONS A, B, C, and D	3.3.G.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	these MODES.		
3.1.1 M.6	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.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.	3.1.1 Required Actions D.3 and D.4	3.3.G.2
3.1.2 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 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 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 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 adding a new Required Action to verify stuck control rod separation criteria is met.	3.1.3 ACTIONS A and C	3.3.A.2.(a), 3.3.B.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 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 M.3	CTS 3.3.A.2.(c), in part, requires the unit to be in hot shutdown (MODE 3) 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 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, SR 3.1.3.4	None
3.1.3 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 require 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 Required Action A.3, SR 3.1.3.2, SR 3.1.3.3,	4.3.A.2.(a), 4.3.A.2.(b)
3.1.3 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 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 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 ACTION E	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.3 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 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 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 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 have been established for no more than 8 "slow" OPERABLE control rods and no more than 2 "slow" OPERABLE control rods occupying adjacent locations.	LCO 3.1.4, Table 3.1.4-1	3.3.C.1, 3.3.C.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.1.4 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 ≥ 800 psig prior to exceeding 40% RTP after each reactor shutdown ≥ 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 ≥ 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 ³ 800 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 ≥ 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, SR 3.1.4.2, SR 3.1.4.3, SR 3.1.4.4	4.3.C
3.1.4 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
3.1.4 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 ≤ 1% RATED THERMAL POWER (RTP).	3.1.4 Applicability	3.3.C.1
3.1.5 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 ≥ 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 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	SR 3.1.6.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	requirement to verify all OPERABLE control rods comply with BPWS.		
3.1.7 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 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, SR 3.1.7.6, and SR 3.1.7.9	None
3.1.7 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 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. This changes the CTS by placing a time limit of 24 hours to perform the Surveillance.	SR 3.1.7.5	4.4.B.2
3.1.8 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 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 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	SR 3.2.2.2	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Specifications.		
3.3.1.1 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 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 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%." 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 ACTIONS E, F, G, and H	3.1.B.3, Table 3.1.1 Required Conditions A, B, C, and D
3.3.1.1 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1.1 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 Trip Function 5, including Notes (3) and (9)
3.3.1.1 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 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.	Table 3.3.1.1-1 Function 6	Table 3.1.1 Trip Function 6, including Notes (3) and (4)
3.3.1.1 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 Trip Function 7, including Note (3)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.1.1 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 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 ≥ 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 Trip Function 11, including Note (7)
3.3.1.1 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 Table 3.3.1.1-1. This changes the CTS by adding this SR associated with the automatic scram contactors.	SR 3.3.1.1.4	None
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 that states 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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. However, ITS SR 3.3.1.1.9 is modified by a Note that states "Neutron detectors are excluded." 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-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.	SR 3.3.1.2.5	4.10.B
3.3.1.2 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 $\geq$ 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 requiring a count rate verification in MODE 2, not just prior to entering MODE 2.	SR 3.3.1.2.4	4.3.B.4, 4.10.B
3.3.1.2 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 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	SR 3.3.1.2.1, SR 3.3.1.2.6, SR 3.3.1.2.7	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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.		
3.3.1.2 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 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 ACTION E	3.3.G.1
3.3.1.2 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 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 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 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 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	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E,	1.0.Y

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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 that specifies the SR is not required to be performed until 1 hour after the reactor mode switch is in the shutdown 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.	SR 3.3.2.1.7	
3.3.2.1 M.3	ITS SR 3.3.2.1.6 requires verification that the RWM is not bypassed when THERMAL POWER is ≤ 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 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 ≤ 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 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 ≤ 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 that specifies this SR is not required to be performed until 1 hour after THERMAL POWER is ≤ 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, SR 3.3.2.1.3 including Note	4.3.B.3.(a)(iv)
3.3.2.2 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 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.	3.3.3.1 Applicability	3.14
3.3.3.1 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 this is modified	Table 3.3.3.1-1 Functions 1 and 6 (including footnotes (a) and (b), 3.3.3.1 ACTIONS A, B, C, D, and E (for Functions 1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	by two footnotes, footnotes (a) and (b). Footnote (a) does not require position indication for isolation valves whose penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. Footnote (b) requires only one position indication channel per penetration flow path with one installed channel located in the control room. 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.	and 6), SR 3.3.3.1.1 and SR 3.3.3.1.2 (for Functions 1 and 6)	
3.3.3.2 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, 3.3.3.2 ACTION B	3.13.A.1, 3.13.A.2.d
3.3.3.2 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, 3.13.A.2.c
3.3.3.2 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 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 Surveillance Requirements that were not previously required.	SR 3.3.3.2.1, SR 3.3.3.2.3	None
3.3.4.1	CTS Table 3.2.5 provides the Trip Setting for the ATWS-RPT Low-Low Reactor Water Level	SR 3.3.4.1.4	Table 3.2.5 Function

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
M.1	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 ≥ 6.0 seconds and ≤ 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.		2
3.3.4.1 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 when 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 Required Action D.2	Table 3.2.5 Note 1
3.3.4.1 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 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 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 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 - 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.	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	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.5.1 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 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 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 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 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 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 ACTIONS C and G	Table 3.2.2 Note 3.(a), Table 3.2.8 Note 1.a
3.3.5.1 M.8	*** THIS ITEM IS A BSI ***	Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and	Table 3.2.2 Function C.3

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
BSI 1.c.	*** Please see separate safety review and safety evaluation *** 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 have 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. In addition, two Notes have been added (ITS Table 3.3.5.1-1 Notes (c) and (d)) to the CHANNEL CALIBRATION (ITS SR 3.3.5.1.4) associated with ITS Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and 5.d. Note (c) states, “If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.” Note (d) states, “The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the nominal trip setpoint; otherwise, the channel shall be declared inoperable. The nominal trip setpoint and the methodology used to determine the as-found tolerance and the as-left tolerance are specified in the Technical Requirements Manual (TRM). This changes the CTS by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value," and adds the Notes to the CHANNEL CALIBRATION (ITS SR 3.3.5.1.4) associated with ITS Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and 5.d. The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8.	5.d	
3.3.5.2 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 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 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

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 operations.	None	Table 3.2.1 Note (5)
3.3.6.1 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	3.3.6.1 Required Action D.1,	Table 3.2.1 Required Conditions

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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 ACTIONS E, F, and G	A, B, C, D, E, F, and G; Table 3.2.1 Note (2)(c)
3.3.6.1 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 M.7	CTS Table 4.2.1 does not specify requirements for a LOGIC SYSTEM FUNCTIONAL TEST. 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.	SR 3.3.6.1.6	None
3.3.6.1 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 M.9	*** THIS ITEM IS A BSI ***	Table 3.3.6.1-1 Functions 3.a, 3.b, 3.c, 4.c,	Table 3.2.1 Functions 3.d, 4.a, 4.b, 4.c, and

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
BSI 1.f	*** Please see separate safety review and safety evaluation *** 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.	and 5.a	5.b
3.3.6.2 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 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 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 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 3.3.6.3 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 $\leq$ 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 shutdown the plant to MODE 4 when a shutdown is required.	3.3.6.3 Applicability, 3.3.6.3 ACTION B	3.2.H, 3.6.E.1, Table 3.2.7 Required Conditions A and B
3.3.6.3 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 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	SR 3.3.6.3.6	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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.		
3.3.6.3 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 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 Surveillance Frequency from "Once/month" to "12 hours."	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)
3.3.7.1 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 that 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 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 by 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 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.3.8.1 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 generator (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 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 M.3 BSI 1.h	*** THIS ITEM IS A BSI *** *** This change requires further NRC staff review (TAC No. MD1267) and is discussed in Section G.1.1.h of the safety evaluation *** 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.	Table 3.3.8.1-1 Functions 2.a and 2.b	Table 3.2.6 Function 1
3.3.8.2 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	3.3.8.2 ACTIONS C, D, E, and F	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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 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 M.3 BSI 5	*** THIS ITEM IS A BSI *** *** Please see separate safety review and safety evaluation *** 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 by 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 M.1 BSI 6	*** THIS ITEM IS A BSI *** *** Please see separate safety review and safety evaluation *** CTS 4.5.F.1 provides a cross reference to the SRs 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 SR.	SR 3.4.1.2	4.6.G
3.4.1 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. # 10% of rated core flow when operating at < 70% of rated core flow;	LCO 3.4.1, 3.4.1 ACTION B, SR 3.4.1.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	and b. # 5% of rated core flow when operating at $ 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 condition when the flows are not matched, and adds a new SR 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 does 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 the criteria in either 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.3 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 ≤ 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, 3.4.3 ACTION B	3.6.E.1, 3.6.E.2
3.4.3 M.2	CTS 3.6.E.1 requires the S/RVs to 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 Surveillance states that following testing, lift settings shall be within " 1%. This changes the CTS by providing a minimum setting for the S/RVs.	SR 3.4.3.1	3.6.E.1
3.4.3 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 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, 4.6.D.1.a
3.4.5 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, 3.6.D.2.b, 3.6.D.2.c
3.4.6 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 Required Action B.1	3.6.C.4
3.4.7 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 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.	3.4.7	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.8 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 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 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 to take when the unit is already in the shutdown condition.	3.4.9 ACTIONS A, B, and C	None
3.4.9 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.4.9 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, 3.6.B.3
3.4.9 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 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 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 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 reducing the restoration time from 7 days to 72 hours.	3.5.1 ACTION K	3.5.A.3.c
3.5.1 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 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 ³ 950 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.5.1 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 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, SR 3.5.1.2, SR 3.5.1.3, SR 3.5.1.5, SR 3.5.1.6, SR 3.5.1.13	None
3.5.1 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. 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.	LCO 3.5.1, SR 3.5.1.4	3.5.B, 3.5.B.1
3.5.2 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 ^{3} 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	LCO 3.5.2, 3.5.2 Applicability, 3.5.2 Required Action C.2, 3.5.2 ACTION D	3.5.E.1

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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.		
3.5.2 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 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, that 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 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.	SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4, SR 3.5.2.5	None
3.5.2 M.4	CTS 3.7.A.1, in part, requires the suppression pool volume to be met while work is being done that 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 ³ 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 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	3.5.2 Required Action C.2, 3.5.2 ACTION D	3.7.A.1.f

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	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, adding 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 adding 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 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 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.	SR 3.5.2.1	4.7.A.1.e
3.5.2 M.7	CTS 3.5.E.1, in part, allows all low pressure ECCS to be inoperable provided no work is being done that 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 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 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 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	SR 3.5.3.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	by adding this Surveillance Requirement to the Technical Specifications.		
3.6.1.1 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 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 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.	SR 3.6.1.1.2	4.7.A.4.a.(2)
3.6.1.1 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 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 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 ≤ 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 the addition of new ACTIONS for the third Applicability (i.e. in MODES 4 and 5 when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1)	3.6.1.3 Applicability, 3.6.1.3 ACTIONS A, B, and F	3.7.D.1
3.6.1.3 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 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	SR 3.6.1.3.6	4.7.D.1.a

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	each MSIV is ≥ 3 seconds and ≤ 9.9 seconds. This changes the CTS by specifying the explicit acceptance criteria for the MSIV isolation time.		
3.6.1.3 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, SR 3.6.1.3.10	None
3.6.1.3 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, SR 3.6.1.3.9	None
3.6.1.3 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 allow 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, SR 3.6.1.3.3	None
3.6.1.3 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 ≤ 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 in MODE 3 in 12 hours and in cold shutdown (i.e., MODE 4) in 36 hours, in lieu of being ≤ 1% RTP in 24 hours.	3.6.1.3 ACTION E	3.7.D.4
3.6.1.4 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 ≤ 135/F. Appropriate ACTIONS and a Surveillance Requirement are also provided. This changes the CTS by incorporating the	3.6.1.4	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	requirements of ITS 3.6.1.4.		
3.6.1.5 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 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 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 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 CTS by adding finite times to shut down the unit when it is operating.	3.6.1.5 ACTION B	None
3.6.1.6 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1.6 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) if 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 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 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 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 M.3	CTS 3.7.A.4.b allows a suppression chamber-to-drywell vacuum breaker to be not fully closed by 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.	3.6.1.7 ACTION B	3.7.A.4.b, 3.7.A.4.c

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.1.7 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, 3.6.1.7 ACTION A	3.7.A.4.a, 3.7.A.4.c
3.6.1.8 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 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, 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.	SR 3.6.1.8.1	None
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 $\leq$ 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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 ≤ 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 ACTION B	3.7.A.1.f
3.6.2.1 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 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 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.6.2.3 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, SR 3.6.2.3.2	None
3.6.4.1 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 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 Applicability	3.7.C.2.a, 3.7.C.2.b
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, 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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
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, 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 allow 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, 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

Table M - More Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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 an additional 36 hours is allowed to place the reactor 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
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 Surveillance Requirement to the Technical Specifications.	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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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 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.	3.7.4 ACTIONS B and E	3.17.B.1.b
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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
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 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 3.8.1.1, SR 3.8.1.4, SR 3.8.1.6, SR 3.8.1.7, SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11	None
3.8.1 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, 3.9.B.3.a.2)

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.1 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 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 Required Actions A.1 and B.1	3.9.B.2, 3.9.B.3.a
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 ³ 3975V and £ 4400V and a frequency of ³ 58.8Hz and £ 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 ≥ 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 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	3.8.1 ACTION D, including Note	3.9.B.1, 3.9.B.2

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	can operate with one required offsite source and one EDG inoperable.		
3.8.2 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, are 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.L
3.8.2 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
3.8.3 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.3 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, SR 3.8.3.3	4.9.B.3.b.3)
3.8.3 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, 3.8.3 ACTION B, SR 3.8.3.2	None
3.8.4 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 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 is 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 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 system is 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	3.8.4 ACTION C	3.9.B, 3.9.B.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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 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, that each required battery charger can supply ≥ 150 amps for the station 250 VDC subsystem and ≥ 50 amps for station 125 VDC subsystems at greater than or equal to the minimum established float voltage for ≥ 4 hours, or that 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 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 new Surveillance Requirement for verifying the OPERABILITY of the Division 1 and Division 2 125 VDC and 250 VDC batteries.	SR 3.8.4.3, including Notes 1 and 2	None
3.8.5 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 M.1	ITS SR 3.8.6.1 requires the verification every 7 days that each battery float current is ≤ 2 amps for the 250 VDC batteries and ≤ 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

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
3.8.6 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 ≥ 2.07 V and ITS SR 3.8.6.5 requires quarterly verification that each battery connected cell voltage is ≥ 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, SR 3.8.6.5	4.9.B.4.a, 4.9.B.4.b
3.8.6 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 ≥ 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 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 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 verifying the OPERABILITY of the required Division 1 and Division 2 AC and DC electrical power distribution subsystems.	SR 3.8.7.1	None
3.8.7 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 system is 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 is 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 subsystem is 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	3.8.7 ACTIONS C and D	3.9.B, 3.9.B.4

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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 subsystem is 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.		
3.8.8 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 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.	SR 3.8.8.1	None
3.9.1 M.1	CTS 4.10.A requires the refueling interlocks (in this case the refueling equipment interlocks) to be functionally 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 functionally 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	SR 3.9.2.2	4.10.A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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.		
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
3.9.4 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 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, 3.9.5 ACTION A, SR 3.9.5.1	3.3.D
3.9.5 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 that the alarm in the control room must be checked.	SR 3.9.5.2	4.3.D
3.9.5 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 M.1	The CTS does not have any requirements for the reactor pressure vessel (RPV) water level to ensure the consequences of a design basis refuel accident are 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 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 ^{3} 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	3.9.7	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	Surveillance Requirement are also provided. This changes the CTS by incorporating the requirements of ITS 3.9.7.		
3.9.8 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 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.	3.9.8	None
3.10.2 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, full insertion of all insertable control rods in core cells containing one or more fuel assemblies and, within 1 hour, placement of the reactor mode switch in either 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, 3.10.2 ACTION A, SR 3.10.2.1, SR 3.10.2.2	3.10.E
3.10.6 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, SR 3.10.6.3	3.10.E
3.10.6 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 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, SR 3.10.6.3	None

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 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 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 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, 4.3.1.2.e	None
4.0 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 states 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, 4.3.1.1.d	None
4.0 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 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 M.1	ITS 5.1.1 requires that the plant manager or his designee approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety. The CTS does not include this requirement. This changes the CTS by adding an approval requirement for the plant manager or his designee.	5.1.1	None

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
5.1 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 that the designated individual hold an active Senior Operator license. In MODE 4 or 5, ITS 5.1.2 requires that 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 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 Quality Assurance Topical Report (QATR). This changes the CTS by requiring that this specific information be located only in the USAR or QATR.	5.2.1.a	6.1.B.1
5.5 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: ITS 5.5.4, "Component Cyclic or Transient Limit"; ITS 5.5.10, "Safety Function Determination Program (SFDP)"; and ITS 5.5.12, "Battery Monitoring and Maintenance Program."	5.5.4, 5.5.10, 5.5.12	None
5.5 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, 5.5.8.b, 5.5.8.c	4.9.B.3.b.3)
5.6 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	5.6.4	Table 3.14.1 Required Condition A

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement
	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.		