

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
1.0 L.1	<p>The CTS 1.0.A definition of Alteration of the Reactor Core applies to the act of moving "any component." However, the definition also states that the normal operating functions such as control rod movement using the normal drive mechanism, tip scans, SRM and IRM detector movements, etc., are not to be considered core alterations. The ITS Section 1.1 definition of CORE ALTERATION will only apply to the movement of "fuel, sources, or reactivity control components." In addition, the following exceptions are not considered to be CORE ALTERATIONS in the ITS: a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and b. control rod movement, provided there are no fuel assemblies in the associated core cell. This changes the CTS by eliminating from the definition of Alteration of the Core the movement of components that do not affect the reactivity of the core, i.e., that are not fuel, sources, or reactivity control components, and it also explicitly excludes local power range monitors and special moveable detectors from being a CORE ALTERATION. The change in the control rod movement portion of the definition is discussed in DOC M.2.</p>	1.1	1.0.A	Note 1
1.0 L.2	<p>The CTS 1.0.E definition of Instrument Functional Test requires the use of a "simulated" signal when performing the test. The ITS Section 1.1 CHANNEL FUNCTIONAL TEST definition allows the use of a "simulated or actual" signal when performing the test. This changes the CTS by allowing the use of unplanned actuations to perform the Surveillance if sufficient information is collected to satisfy the surveillance test requirements.</p>	1.1	1.0.E	Note 1
1.0 L.3	<p>CTS 1.0.E defines Instrument Functional Test as the injection of a simulated signal "into the primary sensor." ITS Section 1.1 defines CHANNEL FUNCTIONAL TEST as the injection of a simulated or actual signal "into the channel as close to the sensor as practicable." This changes the CTS by allowing a signal to be injected "in the channel as close to the sensor as practicable" instead of "into the primary sensor."</p>	1.1	1.0.E	Note 1
2	None	None	None	None
3.0 L.1	<p>The CTS does not include any general LCO/ACTION guidance requirements. However, CTS 3.6.D.2 provides an explicit allowance that entry into a MODE is allowed when either a drywell floor drain sump monitoring system or the drywell particulate radioactivity monitoring system is inoperable. Thus, it is implicit that for all other Specifications, entry into a MODE or other specified condition in the Applicability of a Specification is not allowed. ITS LCO 3.0.4 is added to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall</p>	LCO 3.0.4	N/A	Note 2

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS by providing explicit guidance for entry into a MODE or other specified condition in the Applicability when an LCO is not met.</p>			
<p>3.0 L.2</p>	<p>ITS LCO 3.0.5 has been added to establish allowances for restoring equipment to service. ITS LCO 3.0.5 states "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY." This changes the CTS by adding the explicit allowance stated in LCO 3.0.5.</p>	<p>LCO 3.0.5</p>	<p>N/A</p>	<p>Note 2</p>
<p>3.0 L.3</p>	<p>CTS 4.0.B states, in part, "Specific time intervals between tests may be extended up to 25% of the surveillance interval." ITS SR 3.0.2 includes a similar requirement, but adds the following: "If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance." This changes the CTS by adding an allowance that if a Required Action's Completion Time requires periodic performance on a "once per . . ." basis, the 25% Frequency extension applies to each performance after the initial performance.</p>	<p>SR 3.0.2</p>	<p>4.0.B</p>	<p>Note 2</p>
<p>3.0 L.4</p>	<p>CTS 4.0.C states "Discontinued surveillance tests shall be resumed less than one test interval before establishing plant conditions requiring operability of the associated system or component." ITS SR 3.0.4 states "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS by allowing a discontinued</p>	<p>SR 3.0.4</p>	<p>4.0.C</p>	<p>Note 2</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	Surveillance (a Surveillance discontinued due to being outside the Applicability of the LCO) to be met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. This also changes the CTS by allowing a change in MODES or other specified conditions in the Applicability when a Surveillance is not current, provided the change in MODES or other specified conditions in the Applicability are allowed by LCO 3.0.4, are required to comply with ACTIONS, or are part of a shutdown of the unit.			
3.1.2 L.1	CTS 3.3.E states, in part, "If the difference exceeds one per cent, delta k, reactor power operation shall not be permitted until the cause has been evaluated and appropriate corrective action has been completed." This effectively requires an immediate unit shutdown if the reactivity difference is greater than 1% $\Delta k/k$. ITS 3.1.2 ACTIONS A and B cover the condition when the reactivity anomaly criterion is not met. ITS 3.1.2 ACTION A requires restoration of the core reactivity difference to within limit in 72 hours. If this Required Action and Completion Time are not met, ITS 3.1.2 ACTION B requires the unit to be in MODE 3 in 12 hours. This changes the CTS by allowing 72 hours to restore the reactivity difference before commencing a shutdown.	3.1.2 ACTIONS A and B	3.3.E	4
3.1.2 L.2	The Frequency of the reactivity anomaly Surveillance in CTS 4.3.E is at least every "equivalent full power month" (approximately 611 MWD/T, where T is a short ton), and it is required to be performed "At specific power operating conditions." ITS SR 3.1.2.1 requires this same test to be performed every 1000 MWD/T during operations in MODE 1. This changes the CTS by extending the Surveillance Frequency from 611 MWD/T to 1000 MWD/T, and specifies that the "specific power operating condition" is MODE 1.	SR 3.1.2.1	4.3.E	7
3.1.3 L.1	CTS 3.3.A.2.(a) states, in part, that control rod drives which cannot be moved "with control rod drive pressure" shall be considered inoperable. ITS 3.1.3 does not include this specific requirement. ITS 3.1.3 requires each control rod to be OPERABLE. A rod is considered OPERABLE, with respect to motion, if it can be inserted at least one notch using either scram pressure or normal control rod drive pressure (ITS SR 3.1.3.2 and SR 3.1.3.3) and if it can be scrammed within \leq 7.0 seconds (ITS SR 3.1.3.4). This changes the CTS by deleting the requirement to consider a control rod inoperable if it cannot be moved by control rod drive pressure alone.	None	3.3.A.2.(a)	1
3.1.3 L.2	CTS 3.3.A.2.(b) requires, in part, the unit to be in hot shutdown within 48 hours if it is confirmed that a control rod drive collet housing failure is the cause of the stuck control rod. ITS 3.1.3 ACTION A covers the condition for one stuck control rod. Continuous operation is allowed regardless of the reason for the control rod being stuck. This changes the CTS by allowing continuous operation with any	3.1.3 ACTION A	3.3.A.2.(b)	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	type of stuck rod, even if it is as a result of a control rod drive collet housing failure.			
3.1.3 L.3	CTS 4.3.A.2.(a) requires each fully or partially withdrawn operable control rod to be exercised at least one notch "each week." ITS SR 3.1.3.2 requires a similar Surveillance for fully withdrawn control rods and ITS SR 3.1.3.3 requires a similar Surveillance for partially withdrawn control rods; however, the Surveillance Frequency for ITS SR 3.1.3.3 is every 31 days. In addition, each Surveillance contains a Note that allows the performance of the Surveillance to be delayed for a certain time after the control rod is withdrawn and THERMAL POWER is greater than the low power setpoint (LPSP) of the rod worth minimizer (RWM). ITS SR 3.1.3.2 may be delayed for 7 days while ITS SR 3.1.3.3 may be delayed 31 days. This changes the CTS by extending the Surveillance Frequency from 7 days to 31 days for control rods that are partially withdrawn and providing a delay period for initial performance of the Surveillance after a control rod is withdrawn and THERMAL POWER is greater than the LPSP of RWM.	SR 3.1.3.2 Note, SR 3.1.3.3 including Note	4.3.A.2.(a)	7
3.1.3 L.4	CTS 4.3.A.2.(b) states, in part, "each fully or partially withdrawn operable control rod shall be exercised at least one notch every 24 hour period" when a control rod is found to be stuck. When a control rod is stuck, ITS 3.1.3 Required Action A.3 states to perform SR 3.1.3.2 and SR 3.1.3.3 (the control rod insertion Surveillances for fully and partially withdrawn control rods) for each withdrawn OPERABLE control rod "24 hours from discovery of the stuck rod concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM." This changes the CTS by only requiring the test to be performed one time, and allowing the test to be delayed up to 24 hours from discovery of the stuck rod concurrent with THERMAL POWER greater than the LPSP of the RWM.	3.1.3 Required Action A.3	4.3.A.2.(b)	3
3.1.3 L.5	CTS 4.3.B.1.(b) states "when the rod is withdrawn the first time subsequent to each refueling outage, observe discernible response of the nuclear instrumentation. However, for initial rods when response is not discernible, subsequent exercising of these rods after the reactor is critical shall be performed to observe nuclear instrumentation response." ITS 3.1.3 does not include this requirement. This changes the CTS by eliminating the Surveillance Requirement to verify discernible nuclear instrumentation response when the rod is withdrawn.	None	4.3.B.1.(b)	5
3.1.3 L.6	CTS 3.3.B.1 does not explicitly state when the control rod coupling requirements are required to be met, however it does state that the requirement is not applicable when moving a control rod drive for inspection as long as the reactor is in the refueling mode. CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours when the requirements of CTS 3/4.3.B.1 are not met. Thus, the implication is that CTS 3.3.B.1 is applicable in MODES 1, 2, and 3. ITS 3.1.3 states that the control rods must be OPERABLE in MODES 1 and 2, and ITS 3.1.3 ACTION E only requires the unit to be in MODE 3 (hot shutdown) within	3.1.3 Applicability, 3.1.3 ACTION E	3.3.B.1, 3.3.G.1	2

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	12 hours when the actions are not met. This changes the CTS by only requiring the control rod coupling requirements to be met in MODES 1 and 2 and, concurrently, changing the shutdown action condition from cold shutdown (MODE 4) in 24 hours to hot shutdown (MODE 3) in 12 hours.			
3.1.5 L.1	CTS 4.3.D requires a check of the status in the control room of the required OPERABLE accumulator every 12 hours. ITS SR 3.1.5.1 requires a similar verification that the pressure in each accumulator is ≥ 940 psig every 7 days. This changes the CTS extending the Surveillance Frequency from once every 12 hours to every 7 days.	SR 3.1.5.1	4.3.D	7
3.1.5 L.2	CTS 4.3.D requires, in part, the check of the status in the control room of the required OPERABLE accumulator level alarm. The ITS does not include this requirement. This changes the CTS by deleting the requirement to verify the alarm for accumulator level in the control room.	None	4.3.D	6
3.1.5 L.3 Some items discussed in L.3 are A and some are M. They are all discussed here for clarity because they are related to the same issue of inoperable control rod scram accumulators.	CTS 3.3.D states, in part, that if a control rod with an inoperable accumulator is inserted full-in and is disarmed, it shall not be considered to have an inoperable accumulator. CTS 3.3.D.1 also states a control rod scram accumulator may be inoperable provided that no other control rod within two control rod cells in any direction has an inoperable accumulator or a directional control valve electrically disarmed while in a non-fully inserted position. CTS 3.3.G.1 states, in part, that if Specification 3.3.D is not met, an orderly shutdown shall be initiated and the reactor shall be placed in the cold shutdown (MODE 4) condition within 24 hours. CTS 3.3.D and CTS 3.3.D.1 do not provide any time to insert control rods associated with inoperable control rod accumulators: therefore, as soon as it is determined that a control rod accumulator is inoperable and the provisions of CTS 3.3.D.1 are not met, CTS 3.3.G.1 must be immediately entered. ITS 3.1.5 ACTION A covers the condition of one control rod scram accumulator inoperable with reactor steam dome pressure ≥ 900 psig, and requires the declaration within 8 hours that either the associated control rod scram time is slow (ITS 3.1.5 Required Action A.1) or the associated control rod is inoperable (ITS 3.1.5 Required Action A.2). The requirement to declare the associated control rod slow is only applicable if the associated control rod scram time was within limits during the last scram time Surveillance. ITS 3.1.5 ACTION B covers the Condition for two or more control rod scram accumulators inoperable with reactor steam dome pressure ≥ 900 psig, and requires the restoration of charging water header pressure to ≥ 940 psig within 20 minutes from discovery of Condition B (i.e., two or more control rod scram accumulators inoperable with steam dome pressure ≥ 900 psig) concurrent with charging water header pressure < 940 psig (ITS 3.1.5 Required Action B.1) and, within 1 hour, a declaration that the associated control rod scram time is slow (ITS 3.1.5 Required Action B.2.1) or that the associated	3.1.5 ACTIONS A, B, and C	3.3.D, 3.3.D.1, 3.3.G.1	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>control rod is inoperable (ITS 3.1.5 Required Action B.2.2). The requirement to declare the associated control rod scram time slow is only applicable if the associated control rod scram time was within limits during the last scram time Surveillance. ITS 3.1.5 ACTION C covers the condition for one or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig, and requires the immediate verification that all control rods associated with inoperable accumulators are fully inserted upon discovery of charging water header pressure < 940 psig (ITS 3.1.5 Required Action C.1) and the declaration within 1 hour that the associated control rod is inoperable (ITS 3.1.5 Required Action C.2). ITS 3.1.5 ACTION D covers the condition when Required Action B.1 or C.1 and associated Completion Time is not met, and requires the immediate placement of the reactor mode switch in the shutdown position (Required Action D.1). This Required Action is not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods. This changes the CTS in several ways, some administrative, some more restrictive, and some less restrictive.</p>			
<p>3.1.6 L.1</p>	<p>CTS 3.3.B.3.(a) requires the control rod withdrawal sequences to be established but does not explicitly specify the Applicability of the control rod withdrawal sequences. However, CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if CTS 3.3.B.3.(a) is not met. Thus this implicitly requires the control rod withdrawal sequence to be met in MODES 1, 2, and 3. ITS LCO 3.1.6 requires all OPERABLE control rods to be in compliance with the bank position withdrawal sequence in MODES 1 and 2 with THERMAL POWER ≤ 10% RTP. This change is designated as less restrictive because the LCO requirements are applicable in fewer operating conditions than in the CTS.</p>	<p>3.1.6 Applicability</p>	<p>3.3.B.3.(a), 3.3.G.1</p>	<p>2</p>
<p>3.1.6 L.2</p>	<p>CTS 3.3.G.1 requires the unit to be in cold shutdown (MODE 4) within 24 hours if the requirement of CTS 3.3.B.3.(a) (control rod withdrawal sequence requirement) is not met. ITS 3.1.6 ACTION A covers the condition when one or more OPERABLE control rods are not in compliance with BPWS, and requires the associated control rod(s) to be moved to the correct position or to be declared inoperable within 8 hours. A Note is included for ITS 3.1.6 Required Action A.1 that states the rod worth minimizer (RWM) may be bypassed as allowed by LCO 3.3.2.1, "Control Rod Block Instrumentation." ITS 3.1.6 ACTION B covers the condition when nine or more OPERABLE control rods are not in compliance with BPWS, requires the immediate suspension of control rod withdrawal, and requires the reactor mode switch to be placed in the shutdown position within 1 hour. A Note similar to the one for ITS 3.1.6 Required Action A.1 is included for ITS 3.1.6 Required Action B.1. This changes the CTS by adding specific ACTIONS for OPERABLE control rods not in compliance with BPWS, in lieu of a shutdown to MODE 4.</p>	<p>3.1.6 ACTIONS A and B</p>	<p>3.3.G.1</p>	<p>4</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.7 L.1	CTS 3.4.A does not provide actions for when two SLC subsystems are inoperable, thus CTS 3.4.C must be entered and the unit must be placed in hot shutdown. ITS 3.1.7 ACTION C covers the condition when two SLC subsystems are inoperable for reasons other than Condition A (i.e., boron concentration not within limits), and requires the restoration of one SLC subsystem to OPERABLE status within 8 hours. This changes the CTS by providing 8 hours to restore one SLC subsystem to OPERABLE status when it is discovered that both SLC subsystems are inoperable prior to requiring a unit shutdown.	3.1.7 ACTION C	3.4.C	3
3.1.7 L.2	CTS 4.4.A.1 requires the performance of a SLC pump test. It also states "Comparison of the measured pump flow rate against equation 2 of paragraph 3.4.B.1 shall be made to demonstrate operability of the system in accordance with the ATWS Design Basis." ITS SR 3.1.7.7 requires the SLC pump test, but does not include the requirement about the demonstration of the OPERABILITY of the system in accordance with the ATWS Design Basis. This changes the CTS by deleting the requirement to perform this comparison.	None	4.4.A.1	5
3.1.7 L.3	CTS 4.4.B.1 requires the boron enrichment to be determined at least once per cycle. The laboratory analysis to determine enrichment shall be obtained within 30 days of sampling or chemical addition. ITS SR 3.1.7.10 requires the determination that B-10 enrichment is ≥ 55.0 atom percent B-10 prior to addition to the SLC tank. This changes the CTS by deleting the requirement to verify the storage tank enrichment every cycle and replacing it with a requirement to verify that the solution added to the SLC storage tank is at the proper B-10 enrichment.	SR 3.1.7.10	4.4.B.1	6
3.1.8 L.1	CTS 3.3.F.2.a allows 7 days of continuous operation with any number of SDV drain or vent valves inoperable as long as the redundant valve (i.e., the one in the same line) is verified to be OPERABLE on a daily basis. After the 7 day period, CTS 3.3.F.2.b requires that either the inoperable valve(s) or the associated redundant valve(s) be closed. However, if one valve has been inoperable for greater than 7 days and the valve or its redundant valve is closed, and another valve in a different line becomes inoperable, the CTS does not allow a separate 7 day time to restore the valve; the second inoperable valve or its redundant valve must be closed immediately in order to meet the requirements of CTS 3.3.F.2.b. ITS 3.1.8 ACTIONS are modified by a Note 1 that states "Separate Condition entry is allowed for each SDV vent and drain line." ITS 3.1.8 ACTION A covers inoperabilities for one or more SDV vent or drain lines with one valve inoperable. ITS 3.1.8 ACTION B covers inoperabilities for one or more SDV vent or drain lines with both valves inoperable. This changes the CTS by allowing separate Condition entry for each inoperable SDV vent or drain line. That is, under the same scenario described above, the second inoperable valve will get a 7 day restoration time before the associated line must be isolated. Other modifications associated with CTS 3.3.F.2.a and CTS 3.3.F.2.b are discussed in DOCs A.2, L.2,	3.1.8 ACTIONS Note 1	3.3.F.2.a, 3.3.F.2.b	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1.8 L.2	and L.3. When any scram discharge volume vent or drain valve is made or found inoperable and the associated line is not isolated, CTS 3.3.F.2.a requires daily verification of the OPERABILITY of the redundant valve(s). ITS 3.1.8 ACTION A covers the condition when one SDV vent or drain valve is inoperable in one or more SDV vent or drain lines, but does not require daily verification of the OPERABILITY of the redundant valve in the associated line if the line is not isolated. This changes the CTS by deleting the requirement to verify the OPERABILITY of the redundant valve(s) on a daily basis if the associated line is not isolated.	3.1.8 ACTION A	3.3.F.2.a	4
3.1.8 L.3	When any scram discharge volume vent or drain valve is made or found inoperable, CTS 3.3.F.2.a allows, for a period not to exceed 7 days, the associated line to remain unisolated provided the redundant valve in the line is OPERABLE. If both valves in a SDV line are inoperable, CTS 3.3.F.2.b requires "maintaining" the inoperable valve(s) or the associated redundant valve(s) in the closed position. This effectively means that if both valves in a SDV line are inoperable, the line must be isolated immediately. ITS 3.1.8 ACTION B covers the condition when both valves are inoperable in one or more SDV vent or drain lines. ITS 3.1.8 Required Action B.1 requires isolation of the associated line within 8 hours. This changes the CTS by allowing 8 hours to isolate a vent or drain line in lieu of requiring it to be isolated immediately when both valves are determined to be inoperable.	3.1.8 Required Action B.1	3.3.F.2.b	3
3.1.8 L.4	CTS 3.3.F.2 requires the insertion of all OPERABLE control rods within ten hours if the compensatory actions of CTS 3.3.F.2.a and b cannot be met. ITS 3.1.8 ACTION C requires the unit to be in MODE 3 in 12 hours. This change increases the time to insert all OPERABLE control rods (i.e., to be in MODE 3 as discussed in DOC A.3) from 10 hours to 12 hours.	3.1.8 ACTION C	3.3.F.2	3
3/4.3.B.2 L.1	CTS 3/4.3.B.2 requires the control rod drive housing support system to be in place during reactor power operation and when the reactor coolant system is pressurized above atmospheric pressure with fuel in the reactor vessel, unless all operable control rods are fully inserted and Specification 3.3.A.1 is met. CTS 4.3.B.2 requires the control rod drive housing support system to be inspected after reassembly and the results of the inspection recorded. ITS 3.1 does not include the requirements for the control rod drive housing support system. This changes the CTS by deleting the explicit control rod drive housing support system requirements from the Technical Specifications.	None	3/4.3.B.2	1
3.2.1 L.1	CTS 4.11.A requires the APLHGR to be determined daily during reactor operation at $\geq 25\%$ rated thermal power. ITS SR 3.2.1.1 requires the same verification "once within 12 hours after $\geq 25\%$ RTP and 24 hours thereafter." This changes	SR 3.2.1.1	4.11.A	7

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance.			
3.2.2 L.1	CTS 4.11.C requires the MCPR to be determined daily during reactor operation at $\geq 25\%$ rated thermal power. ITS SR 3.2.2.1 requires the same verification "once within 12 hours after $\geq 25\%$ RTP and 24 hours thereafter." This changes the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance.	SR 3.2.2.1	4.11.C	7
3.2.2 L.2	CTS 4.11.C states MCPR shall be determined daily and "following any change in power level or distribution which has the potential of bringing the core to its operating MCPR." ITS SR 3.2.2.1 requires a similar daily verification, but does not include the additional Frequency based on a change in power level or distribution. This changes the CTS by deleting the requirement to verify MCPRs are within limits "following any change in power level or distribution which has the potential of bringing the core to its operating MCPR."	SR 3.2.2.1	4.11.C	7
3.2.3 L.1	CTS 4.11.B requires the LHGR to be determined daily during reactor operation at $\geq 25\%$ rated thermal power. ITS SR 3.2.3.1 requires the same verification "once within 12 hours after $\geq 25\%$ RTP and 24 hours thereafter." This changes the CTS by allowing the reactor to reach and exceed a THERMAL POWER level of 25% RTP without completing the Surveillance.	SR 3.2.3.1	4.11.B	7
3.3.1.1 L.1	CTS 3.1.A states that the initiation of "any" channel trip to the de-energization of the scram pilot valve solenoids shall not exceed 50 milliseconds. This is essentially a response time requirement. ITS SR 3.3.1.1.14 requires the verification of the RPS RESPONSE TIME. ITS Table 3.3.1.1-1 requires the RPS RESPONSE TIME test to be performed on certain RPS Functions, but not all RPS Functions. This changes the CTS by requiring the testing to be performed only on certain Functions.	SR 3.3.1.1.14	3.1.A	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1.1 L.2	<p>When more than one instrument channel is inoperable for one or more trip functions, CTS 3.1.B.2 requires the immediate placement of the appropriate channel(s) or trip system(s) in the tripped condition. ITS 3.3.1.1 ACTION A covers the situation when one or more required channels are inoperable, and allows 12 hours to either place the channel in trip or to place the associated trip system in trip. ITS 3.3.1.1 ACTION B covers the condition for one or more Functions with one or more required channels inoperable in both trip systems, and requires either the placement of the inoperable channel in one trip system in trip or the placement of one trip system in trip within 6 hours. ITS 3.3.1.1 ACTION C covers the condition for one or more Functions with RPS trip capability not maintained, and allows one hour to restore RPS trip capability. This changes the CTS by allowing 6 hours to take action (by either restoring or tripping a channel) when one or more Functions have one or more required channels inoperable in both trip systems, and allowing one hour to restore automatic RPS trip capability (by either restoring or tripping a channel) when one or more Functions have two channels in a trip system inoperable (i.e. it is not maintaining RPS trip capability) instead of requiring immediate action to be taken.</p>	3.3.1.1 ACTIONS A, B, and C	3.1.B.2	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.1.1 L.3	<p>CTS Table 3.1.1 requires the Mode Switch in Shutdown, Manual Scram, Neutron Flux IRM High - High, Neutron Flux IRM Inoperative, Scram Discharge Volume High Level (East and West) Trip Functions (CTS Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b, respectively) to be OPERABLE when the reactor mode switch is in the Refuel, Startup, and Run (for Trip Functions 1, 2, 8.a, and 8.b only) positions. Furthermore, CTS Table 3.1.1 Note (3) states that these Functions are the only RPS Trip Functions that are required to be OPERABLE when in the refueling mode with the reactor subcritical and reactor water temperature less than 212°F. (The Note 3 reference to High Flux IRM refers to both the Neutron Flux IRM High - High and Inoperative Functions.) CTS Table 3.1.1 footnote **.a allows the Scram Discharge Volume High Level Trip Function to be bypassed in the Refuel mode. During this time, a control rod block is inserted. ITS Table 3.3.1.1-1 requires these Functions to be OPERABLE during MODES 1 (Functions 7.a, 7.b, 10, and 11 only) and 2 and in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies (Table 3.3.1.1-1 Footnote (a)). This changes the CTS by requiring these RPS Trip Functions to be OPERABLE when the reactor mode switch is in the refuel position and one or more vessel head closure bolts are less than fully tensioned (i.e., MODES) only when a control rod is withdrawn from a core cell containing one or more fuel assemblies.</p>	<p>Table 3.3.1.1-1 Functions 1.a, 1.b, 7.a, 7.b, 10, and 11 including footnote (a)</p>	<p>Table 3.1.1 Trip Functions 1, 2, 3.a, 3.b, 8.a, and 8.b, including Note 3 and footnote **.a</p>	2
3.3.1.1 L.4	<p>CTS Table 3.1.1 footnote **.f provides guidance for the bypass of certain RPS instrument channels, and states "One instrument channel for the functions indicated in the table to allow completion of surveillance testing, provided that: 1) Redundant instrument channels in the same trip system are capable of initiating the automatic function and are demonstrated to be operable either immediately prior or immediately subsequent to applying the bypass; and 2) while the bypass is applied, surveillance testing shall proceed on a continuous basis and the remaining instrument channels initiating the same function are tested prior to any other. Upon completion of surveillance testing, the bypass is removed." ITS Table 3.3.1.1 does not include this Note. This changes the CTS by deleting CTS Table 3.1.1 footnote **.f.</p>	None	Table 3.1.1 footnote **.f	7
3.3.1.1 L.5	<p>CTS Table 4.1.1 specifies the requirements for the functional test of various RPS Functions. The functional test requires testing of the "trip channel" and "alarm" for the High Reactor Pressure, High Drywell Pressure, Low Reactor Water Level, High Water Level in Scram Discharge Volume, Main Steam Line Isolation Valve Closure, Turbine Stop Valve Closure, Manual Scram, Turbine Control Valve Fast Closure, and IRM channels, and the functional test requires testing of the "trip output relays" for the APRM/Flow Reference channels and requires the actual placement of the mode switch in the shutdown position for the Mode Switch in Shutdown channels. CTS Table 4.1.2 Note (4) states APRM channel alarms and</p>	<p>SR 3.3.1.1.3, SR 3.3.1.1.4, SR 3.3.1.1.7, and SR 3.3.1.1.10</p>	<p>Table 4.1.1 (for Reactor High Pressure, High Drywell Pressure, Low Reactor Water Level, High Water Level in Scram Discharge Volume, Main Steam Line Isolation Valve</p>	6

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	trips will be verified and calibrated if necessary during functional testing. ITS SR 3.3.1.1.3, SR 3.3.1.1.4, SR 3.3.1.1.7, and SR 3.3.1.1.10 require the performance of a CHANNEL FUNCTIONAL TEST, but do not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm," "Trip Output relays," and "Place mode switch in shutdown."		Closure, Turbine Stop Valve Closure, Manual Scram, Turbine Control Valve Fast Closure, IRM, and APRM/Flow Reference channels), Table 4.1.2 Note 4	
3.3.1.1 L.6	CTS Table 4.1.1 Note 3 applies to the IRM channels and requires a demonstration that the IRM and APRM channels overlap at least 1/2 decade prior to every normal shutdown. This test is not included in ITS 3.3.1.1. This changes the CTS by deleting the IRM/APRM overlap test.	None	Table 4.1.1 Note 3	5
3.3.1.1 L.7	CTS Table 4.1.2 requires the performance of an APRM calibration once every 3 days. CTS Table 4.1.2 Note 4 states that this calibration is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 requires the verification that the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq 2\%$ RTP every 7 days. This changes the CTS by extending the Frequency of testing from 3 days to 7 days. The change adding in an acceptance criterion is discussed in DOC M.4.	SR 3.3.1.1.2	Table 4.1.2 (for APRM) including Note 4	7
3.3.1.1 L.8	CTS Table 4.1.2 requires the performance of an APRM calibration once every 3 days. CTS Table 4.1.2 Note 4 states that this calibration is performed by taking a heat balance and adjusting the APRM to agree with the heat balance. ITS SR 3.3.1.1.2 requires the verification that the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq 2\%$ RTP every 7 days. A Note to ITS SR 3.3.1.1.2 states that the Surveillance is not required to be performed until 12 hours after THERMAL POWER $\geq 25\%$ RTP. This changes the CTS by allowing the plant to enter MODE 1 without meeting the 7 day Frequency and adding the explicit time restraint to complete the test within 12 hours of exceeding 25% RTP. The change to the Frequency is discussed in DOC L.7 and the change adding in an acceptance criterion is discussed in DOC M.4.	SR 3.3.1.1.2 including Note	Table 4.1.2 (for APRM) including Note 4	7
3.3.1.1 L.9	CTS Table 4.1.2 provides the calibration method (i.e., heat balance, pressure standard, water level, or observation) for each RPS Instrument Channel. ITS 3.3.1.1 does not include this information in the associated SRs. This changes the CTS by deleting the calibration method from the CTS.	None	Table 4.1.2	6
3.3.1.1 L.10	CTS Table 4.1.2 Note 1 requires the performance of an IRM calibration during every startup and normal shutdown. ITS Table 3.3.1.1-1 Function 1 (IRM) requires the performance of SR 3.3.1.1.11, a CHANNEL CALIBRATION, every 24	SR 3.3.1.1.11 including Note 2	Table 4.1.2 Note 1	7

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	months. In addition, Note 2 allows the test to be delayed until 12 hours after entering MODE 2 from MODE 1. This changes the CTS by changing the Frequency for an IRM calibration from every startup and normal shutdown to 24 months and allows the Surveillance to be delayed during a shutdown until 12 hours after entering MODE 2 from MODE 1.			
3.3.1.1 L.11	CTS 1.0.F requires the performance of a response time test once per cycle. ITS SR 3.3.1.1.14 requires the performance of a RPS RESPONSE TIME test every 24 months "on a STAGGERED TEST BASIS." ITS SR 3.3.1.1.14 is modified by a Note that states, "For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency." This changes the CTS by allowing the testing to be performed on a 24 month "STAGGERED TEST BASIS" instead of every 24 months. The change from once per cycle Frequency to a 24 month Frequency is discussed in DOC A.9.	SR 3.3.1.1.14 including Note	1.0.F	7
3.3.1.1 L.12	CTS 3.1.A refers to the "setpoints" of the RPS Instrumentation Functions in CTS Table 3.1.1 and CTS Table 3.1.1 specifies the "Limiting Trip Settings" for the RPS Instrumentation Functions. The Limiting Trip Setting value of CTS Table 3.1.1 Trip Functions 3.a, 4.a, and 4.c have been modified to use Allowable Values as indicated for ITS Table 3.3.1.1-1 Functions 1.a and 2.a. This changes the CTS by requiring the RPS Instrumentation to be set consistent with the "Allowable Value" instead of a more-restrictive "Operability" limit. The change in the term "Limiting Trip Settings" to "Allowable Value" is discussed in DOC A.16.	Table 3.3.1.1-1 Functions 1.a and 2.a	Table 3.1.1 Trip Functions 3.a, 4.a, and 4.c	10
3.3.1.1 L.13	CTS Table 4.1.2 requires the performance of an IRM calibration. ITS Table 3.3.1.1 Function 1 (IRM) requires the performance of SR 3.3.1.1.11, a CHANNEL CALIBRATION; however, the Surveillance includes a Note (Note 1) that excludes the neutron detectors from the calibration. This changes the CTS by not requiring the IRM neutron detectors to be tested.	SR 3.3.1.1.11 Note 1	Table 4.1.2 (for IRM)	6
3.3.1.1 L.14 BSI 2	<p style="text-align: center;">*** THIS ITEM IS A BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>CTS Table 4.1.1 requires a weekly functional test of the Manual Scram Function. ITS Table 3.3.1.1-1 Function 11 and ITS SR 3.3.1.1.5 require the performance of the same test at a 31 day Frequency. This changes the CTS by extending the Manual Scram functional test Frequency from 7 days to 31 days.</p>	SR 3.3.1.1.5	Table 4.1.1 (for Manual Scram Function)	Note 3
3.3.1.2 L.1	CTS 3.10.B requires two SRMs to be OPERABLE during core alterations, one in the core quadrant where fuel or control rods are being moved and one in an adjacent quadrant. ITS SR 3.3.1.2.2.a ensures an OPERABLE SRM is in the fueled region, and Note 2 to ITS SR 3.3.1.2.2 adds an allowance that one SRM may be used to satisfy more than one SRM location requirement. ITS Table 3.3.1.2-1 Footnote (b) allows the number of SRM channels required to be	SR 3.3.1.2.2 including Note 2, Table 3.3.1.2-1 Footnote (b)	3.10.B	6

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	OPERABLE to be reduced from two to one "during spiral offload or reload when the fueled region includes only that SRM detector." This changes the CTS by requiring only one SRM to be OPERABLE during CORE ALTERATIONS that encompass special offloading and reloading when the fueled region includes only that SRM detector.			
3.3.1.2 L.2	CTS 3.3.G.1, in part, requires the unit to be in cold shutdown in 24 hours if the conditions of CTS 3.3.B.4 are not met. ITS 3.3.1.2 ACTIONS A and B provide allowances to restore inoperable SRMs in MODE 2 with the IRMs on Range 2 or below prior to requiring a unit shutdown. ITS 3.3.1.2 ACTION A allows 4 hours to restore one or more inoperable required SRM channels to OPERABLE. Furthermore, ITS 3.3.1.2 ACTION B requires immediate suspension of all control rod withdrawal if there are no OPERABLE required SRMs. This changes the CTS by providing an allowance to restore inoperable SRMs, in MODE 2 with IRMs on Range 2 or below, before requiring a unit shutdown.	3.3.1.2 ACTIONS A and B	3.3.G.1	4
3.3.2.1 L.1	CTS 3.2.C.2.a.(2) requires control rod withdrawal to be blocked within 24 hours if one channel is inoperable. CTS 3.2.C.2.a.(3) requires control rod withdrawal to be blocked immediately if two RBM channels are inoperable. ITS 3.3.2.1 Required Action A.1 allows 24 hours to restore one inoperable RBM channel. ITS 3.3.2.1 ACTION B allows 1 hour to place a RBM channel in trip if the Required Action and associated Completion Time of Condition A is not met, or if two RBM channels are inoperable. This changes the CTS by providing an additional 1 hour to evaluate and restore the inoperable RBM channels before requiring a channel to be placed in trip, thereby blocking control rod withdrawal.	3.3.2.1 Required Action A.1, 3.3.2.1 ACTION B	3.2.C.2.a.(2), 3.2.C.2.a.(3)	4
3.3.2.1 L.2	CTS 4.2.C requires performance of an instrument functional test of the OPERABLE RBM when one RBM channel is inoperable. ITS 3.3.2.1 does not include this Surveillance. This changes the CTS by deleting this Surveillance.	None	4.2.C	5
3.3.2.1 L.3	CTS 3.2.C does not provide a delayed entry into associated Conditions and Required Actions if a RBM channel is inoperable for performance of required Surveillances. ITS 3.3.2.1 Surveillance Requirements Note 2 allows delayed entry into associated Conditions and Required Actions for up to 6 hours if a RBM channel is placed in an inoperable status for performance of required Surveillances, provided the associated Function maintains rod block capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for a RBM channel placed in an inoperable status solely for performance of required Surveillances.	3.3.2.1 Surveillance Requirements Note 2	None	4
3.3.2.1 L.4	CTS 3.3.B.3.(b) allows reactor startup to continue with the rod worth minimizer inoperable only if ≥ 12 control rods have already been withdrawn. ITS 3.3.2.1 Required Action C.2.1.2 allows startup to continue with the RWM inoperable and < 12 rods withdrawn if it is verified that a startup with the RWM inoperable has not	3.3.2.1 Required Action C.2.1.2	3.3.B.3.(b)	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	been performed in the last 12 months. This changes the CTS by providing an additional allowance to continue rod withdrawal with a RWM inoperable.			
3.3.2.1 L.5 BSI 3	<p style="text-align: center;">*** THIS ITEM IS A BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>CTS 3.2.C.2.b states that the RBM bypass time delay must be less than or equal to 2.0 seconds. ITS 3.3.2.1 does not require the RBM bypass time delay to be OPERABLE. This changes the CTS by deleting the RBM bypass time delay requirements.</p>	None	3.2.C.2.b	Note 3
3.3.2.1 L.6	CTS Table 3.2.3 specifies the "Trip Settings" for the RBM instrumentation. The Trip Setting value of CTS Table 3.2.3 Function 4.b has been modified to reflect a new Allowable Value as indicated in ITS Table 3.3.2.1-1 Function 1.e. This changes the CTS by requiring the RBM Downscale instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Settings" to "Allowable Value" is discussed in DOC A.4. This change is less restrictive because less stringent AVs are being applied in the ITS than were applied in the CTSs.	Table 3.3.2.1-1 Function 1.e	Table 3.2.3 Function 4.b	10
3.3.3.1 L.1	CTS 3.14 is applicable whenever irradiated fuel is in the reactor vessel and reactor water temperature is greater than 212°F. Consistent with this Applicability, CTS Table 3.14.1 Required Condition B requires a shutdown to Cold Shutdown (MODE 4) to place the unit outside the Applicability of CTS 3.14. ITS LCO 3.3.3.1 is applicable in MODES 1 and 2. Consistent with this new Applicability, ITS 3.3.3.1 ACTION E only requires a unit shutdown to MODE 3. This changes the CTS by not requiring PAM instrumentation to be OPERABLE in MODE 3 (i.e., reactor water temperature above 212°F) and, consistent with this Applicability, only requiring the unit to be shut down to MODE 3 instead of to MODE 4.	3.3.3.1 Applicability, 3.3.3.1 ACTION E	3.14, Table 3.14.1 Required Condition B	2
3.3.3.1 L.2 BSI 4	<p style="text-align: center;">*** THIS ITEM IS A BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>CTS 4.14 does not provide a delayed entry into associated Conditions and Required Actions if a PAM channel is inoperable solely for performance of required Surveillances. ITS 3.3.3.1 Surveillance Requirements Note 2 has been added to allow delayed entry into associated Conditions and Required Actions for up to 6 hours if a PAM channel is placed in an inoperable status solely for performance of required Surveillances, provided the associated Function</p>	3.3.3.1 Surveillance Requirements Note 2	None	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	maintains capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for a PAM channel placed in an inoperable status solely for performance of required Surveillances.			
3.3.3.1 L.3	CTS Table 3.14.1 Required Condition A allows 7 days to restore an inoperable PAM channel when the number of OPERABLE channels is one less than the total number of channels (i.e., one of the two channels inoperable). ITS 3.3.3.1 ACTION A allows 30 days to restore an inoperable required channel to OPERABLE status when one of the two channels of a PAM Function is inoperable. This changes the CTS by extending the time to restore an inoperable PAM instrumentation channel from 7 days to 30 days.	3.3.3.1 ACTION A	Table 3.14.1 Required Condition A	3
3.3.3.1 L.4	CTS Table 3.14.1 Required Condition B allows 48 hours to restore an inoperable PAM channel when the number of OPERABLE channels is less than the minimum number of channels (i.e., both of the channels are inoperable). This Required Condition applies to the Reactor Vessel Fuel Zone Water Level, Drywell Wide Range Pressure, and Suppression Pool Wide Range Level PAM channels. ITS 3.3.3.1 ACTION C allows 7 days to restore one required inoperable channel to OPERABLE status when both of the channels of a PAM Function are inoperable. This changes the CTS by extending the time to restore an inoperable PAM instrumentation channel, when two channels are inoperable in the same Function, from 48 hours to 7 days.	3.3.3.1 ACTION C	Table 3.14.1 Required Condition B	3
3.3.3.1 L.5	CTS Table 3.14.1 Required Condition D requires immediate initiation of the preplanned alternate method of monitoring the appropriate parameters and the submittal of the report required by Required Condition A if the number of OPERABLE channels is less than the minimum number of channels (i.e., both of the channels are inoperable). This Required Condition applies to the Suppression Pool Temperature and Drywell High Range Radiation PAM channels. ITS 3.3.3.1 ACTION C allows 7 days to restore one required inoperable channel to OPERABLE status when both of the channels of a PAM Function are inoperable. This changes the CTS by providing a 7 day restoration time when two channels are inoperable in the same Function prior to requiring the submittal of a report.	3.3.3.1 ACTION C	Table 3.14.1 Required Condition D	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.3.2 L.1	<p>CTS 3.13.A.1 states that the Alternate Shutdown System controls on the ASDS panel shall be OPERABLE whenever that system or component is required to be OPERABLE. For the system and components covered by this Specification, the Applicability that covers the most conditions is whenever irradiated fuel is in the reactor vessel and the reactor water temperature is greater than 212°F (i.e., the RHR pumps Applicability). In addition, when the restoration time provided by CTS 3.13.A.2.b has expired, CTS 3.13.A.2.d requires placing the reactor in a condition where the systems for which the system controls at the ASDS are inoperable are not required to be OPERABLE in 24 hours. ITS LCO 3.3.3.2 is applicable in MODES 1 and 2. Consistent with this Applicability change, ITS 3.3.3.2 ACTION B requires the plant to be in MODE 3 within 12 hours. This changes the CTS by not requiring the Alternate Shutdown System to be OPERABLE in MODE 3 (i.e., reactor water temperature above 212°F and, consistent with this Applicability, only requiring the unit to be shut down to MODE 3 instead of to MODE 4.</p>	3.3.3.2 Applicability, 3.3.3.2 ACTION B	3.13.A.1, 3.13.A.2.d	2
3.3.3.2 L.2	<p>CTS 3.13.A.2 allows 7 days to restore an inoperable Alternate Shutdown System Function. ITS 3.3.3.2 ACTION A allows 30 days to restore one required inoperable Function to OPERABLE status. This changes the CTS by extending the time to restore an inoperable Alternate Shutdown System Function from 7 days to 30 days.</p>	3.3.3.2 ACTION A	3.13.A.2	3
3.3.4.1 L.1	<p>CTS Table 3.2.5 Note 1 provides an Action for an inoperable ATWS-RPT trip system (i.e., one or two channels in the trip system inoperable) and allows 14 days to restore the trip system to OPERABLE status. If the trip system is not restored to OPERABLE status, or if both trip systems are inoperable, the plant must be placed in at least Startup in 8 hours. ITS 3.3.4.1 includes an ACTIONS Note that allows separate Condition entry for each channel. ITS 3.3.4.1 ACTION A covers the condition for one or more channels inoperable, and allows 14 days to either restore the channel to OPERABLE status or to place the channel in trip. The allowance to place the channel in trip is not applicable if the inoperable channel is the result of an inoperable breaker. ITS 3.3.4.1 ACTION B covers the condition of one Function (Reactor Vessel Water Level - Low Low or Reactor Vessel Steam Dome Pressure - High) with ATWS-RPT trip capability not maintained (i.e., both trip systems for a Function inoperable), and requires restoration of ATWS-RPT trip capability (i.e., restoration of one of the two trip systems) within 72 hours. If both ATWS-RPT Functions do not have trip capability (i.e., both trip systems for a Function inoperable), ITS 3.3.4.1 ACTION C requires restoration of the ATWS-RPT trip capability (i.e., restoration of one of the two trip systems) for one Function within 1 hour. This changes the CTS in several ways: a) it allows 14 days to restore each inoperable channel instead of the current requirement to restore all channels in a trip system to OPERABLE status in 14 days; b) it allows an inoperable channel to be placed in</p>	3.3.4.1 ACTIONS Note, 3.3.4.1 ACTIONS A, B, and C	Table 3.2.5 Note 1	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	trip in lieu of restoring the channel to OPERABLE status; c) it allows 72 hours to restore ATWS-RPT trip capability (i.e., restore one of the two trip systems) for a Function that has two inoperable trip systems prior to requiring a plant shutdown to MODE 2; and d) when both Functions have two inoperable trip systems, it allows 1 hour to restore ATWS-RPT trip capability (i.e., restore one of the two trip systems) for one of the two Functions prior to requiring a plant shutdown to MODE 2.			
3.3.4.1 L.2	CTS Table 3.2.5 Required Condition A requires the unit to be in Startup, Refuel or Shutdown Mode if the Required Actions provided in Note 1 are not met. ITS 3.3.4.1 Required Action D.2 includes a similar requirement, but ITS 3.3.4.1 Required Action D.1 also allows the removal of the affected recirculation pump from service in lieu of shutdown to MODE 2. This Required Action is only applicable if the inoperable channel is the result of an inoperable breaker. This changes the CTS by allowing the breaker to be tripped instead of exiting the MODE 1.	3.3.4.1 Required Action D.1	Table 3.2.5 Required Condition A	4
3.3.4.1 L.3	CTS Table 3.2.5 does not provide a delayed entry into associated Conditions and Required Actions if an ATWS-RPT channel is inoperable solely for performance of required Surveillances. The ITS 3.3.4.1 Surveillance Requirements Note allows delayed entry into associated Conditions and Required Actions for up to 6 hours if an ATWS-RPT channel is placed in an inoperable status solely for performance of required Surveillances, provided the associated Function maintains ATWS-RPT trip capability. This changes the CTS by providing a delay time to enter Conditions and Required Actions for an ATW-RPT channel placed in an inoperable status solely for performance of required Surveillances.	3.3.4.1 Surveillance Requirements Note	None	4
3.3.4.1 L.4	CTS Table 3.2.5 specifies the "Trip Setting" for the ATWS-RPT High Reactor Dome Pressure Function. The Trip Setting value of CTS Table 3.2.5 Function 1 has been modified to reflect the new Allowable Value as indicated in ITS SR 3.3.4.1.5.b. This changes the CTS by requiring the ATWS-RPT instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.6.	SR 3.3.4.1.5.b	Table 3.2.5	10
3.3.5.1 L.1	CTS 3.2.B requires the ECCS Instrumentation Functions in Table 3.2.2 to be OPERABLE when irradiated fuel is in the reactor vessel and the reactor water temperature is above 212°F. ITS Table 3.3.5.1-1 requires the High Pressure Coolant Injection (HPCI) System Instrumentation and the Automatic Depressurization System (ADS) Instrumentation to be OPERABLE in MODE 1 and MODES 2 and 3 with reactor steam dome pressure is > 150 psig. This changes the CTS by deleting the requirement for the HPCI and ADS Instrumentation to be OPERABLE when the reactor water temperature is > 212°F but reactor steam dome pressure is ≤ 150 psig.	Table 3.3.5.1-1 Functions 3, 4, and 5	3.2.B	2

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.5.1 L.2	<p>CTS Table 3.2.2 Function C.3 requires 12 channels of Low Pressure Core Cooling Pumps Discharge Pressure Interlock to be OPERABLE in each trip system. However, CTS Table 3.2.2 Note 4, which applies to each of these Functions, states that all instrument channels are shared by both trip systems. Thus, there are 12 total channels for this Function. ITS Table 3.3.5.1-1 Function 4.c requires two Core Spray Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System A. ITS Table 3.3.5.1-1 Function 4.d requires four Low Pressure Coolant Injection Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System A. ITS Table 3.3.5.1-1 Function 5.c requires two Core Spray Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System B. ITS Table 3.3.5.1-1 Function 5.d requires four Low Pressure Coolant Injection Pump Discharge Pressure - High channels to be OPERABLE for ADS Trip System B. This changes the CTS by only requiring the low pressure ECCS pumps powered from the same electrical division to provide input into the associated (same electrical power division) ADS trip system.</p>	Table 3.3.5.1-1 Functions 4.c, 4.d, 5.c, and 5.d	Table 3.2.2 Function C.3, including Note 4	1
3.3.5.1 L.3	<p>CTS Table 3.2.2 Note 3 provides the Actions for inoperable ECCS instrumentation channels. When one instrument channel is inoperable (per trip function), CTS Table 3.2.2 Note 3.(a) requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel per trip system is inoperable, CTS Table 3.2.2 Note 3.(b) requires the immediate placement of the appropriate channels in the tripped condition. CTS Table 3.2.8 Note 1 provides the Actions for inoperable required HPCI instrumentation channels. When one required instrument channel is inoperable, CTS Table 3.2.8 Note 1.a requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel is inoperable, CTS Table 3.2.8 Note 1.b requires the immediate placement of the appropriate channels or trip system in the tripped condition. ITS Table 3.3.5.1-1 Functions 1.a, 1.b, 2.a, 2.b, 3.a, and 3.b require entry into ITS 3.3.5.1 ACTION B, which requires placement of the channel in the tripped condition within 24 hours. In addition, during operations in MODES 1, 2, and 3 (for Functions 1.a, 1.b, 2.a, and 2.b only), when its redundant feature ECCS initiation capability is inoperable, the supported feature(s) must be declared inoperable within 1 hour from discovery of loss of initiation capability for feature(s) in both divisions. In addition, for Functions 3.a and 3.b, when HPCI initiation capability is lost, the HPCI System must be declared inoperable within 1 hour from discovery of loss of HPCI initiation capability. ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 1.e, 2.c, 2.d, 2.e, and 3.c require entry into ITS 3.3.5.1 ACTION C, which requires restoration of the channel within 24 hours. In addition, during operations in MODES 1, 2, and 3 (for Functions 1.c, 1.d, 1.e, 2.c, 2.d, and 2.e), when its redundant feature ECCS initiation capability is inoperable, the supported</p>	3.3.5.1 ACTIONS Note, 3.3.5.1 ACTIONS B, C, D, F, and G	Table 3.2.2 Note 3, Table 3.2.8 Note 1	3

Table L - Less Restrictive Changes

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

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
<p>3.3.5.1 L.5 BSI 1.d</p>	<p>associated feature(s) inoperable.</p> <p style="text-align: center;">*** THIS ITEM IS A BSI *** *** Please see separate safety review and safety evaluation ***</p> <p>CTS Table 3.2.2 and Table 3.2.8 specify the "Trip Setting" for the ECCS instrumentation Functions. The Trip Settings of CTS Table 3.2.2 Functions A.1.b.i and A.2 and Table 3.2.8 Function C.1 have been modified to reflect new Allowable Values as indicated for ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 2.c, 2.d, and 3.d. In addition, two Notes have been added (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 1.c, 1.d, 2.c, and 2.d.</p> <p>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."</p> <p>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)."</p> <p>In addition, the Allowable Value for ITS Table 3.3.5.1-1 Function 3.d only specifies a single Allowable Value, which is applicable for both one tank and two tank operations. This changes the CTS by requiring the ECCS instrumentation to be set consistent with the new "Allowable Value," and adding the Notes to the CHANNEL CALIBRATION (ITS SR 3.3.5.1.4) associated with ITS Table 3.3.5.1-1 Functions 1.c, 1.d, 2.c, and 2.d. The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8.</p>	<p>Table 3.3.5.1-1 Functions 1.c, 1.d, 2.c, 2.d, and 3.d</p>	<p>Table 3.2.2 Functions A.1.b.i and A.2, Table 3.2.8 Function C.1</p>	<p>10</p>
<p>3.3.5.2 L.1</p>	<p>CTS Table 3.2.8 Note 1 provides the Actions for inoperable required instrumentation channels. When one required instrument channel is inoperable, CTS Table 3.2.8 Note 1.a requires the inoperable channel or trip system be placed in the tripped condition within 12 hours. When more than one instrument channel is inoperable, CTS Table 3.2.8 Note 1.b requires the immediate placement of the appropriate channels or trip system in the tripped condition. ITS Table 3.3.5.2-1 Function 1 (Reactor Vessel Water Level - Low Low) requires entry into ITS 3.3.5.2 ACTION B, which requires placement of the channel in the tripped condition within 24 hours, and it also requires the RCIC System to be declared</p>	<p>3.3.5.2 ACTIONS Note, 3.3.5.2 ACTIONS B, C, and D</p>	<p>Table 3.2.8 Note 1</p>	<p>3</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>inoperable within 1 hour from discovery of loss of RCIC initiation capability. ITS Table 3.3.5.2-1 Function 2 (Reactor Vessel Water Level - High) requires entry into ITS 3.3.5.2 ACTION C, which requires restoration of the inoperable channel within 24 hours. ITS Table 3.3.5.2-1 Function 3 (Condensate Storage Tank Water Level - Low) requires entry into ITS 3.3.5.2 ACTION D, which requires either the placement of the inoperable channel to the tripped condition or the alignment of the RCIC pump suction to the suppression pool within 24 hours, and it also requires the RCIC System to be declared inoperable within 1 hour from discovery of loss of RCIC initiation capability (if the RCIC pump suction is not aligned to the suppression pool). In addition, a Note has been added to the ACTIONS that states that separate Condition entry is allowed for each channel. This changes the CTS by: a) extending the time allowed to take action for each individual Reactor Vessel Water Level - Low Low and Condensate Storage Tank Water Level - Low channel from 12 hours to 24 hours as long as RCIC initiation capability is maintained; b) extending the Completion Time for each individual Reactor Vessel Water Level - High channel from 12 hours to 24 hours; and c) allowing 1 hour to declare RCIC inoperable when the Reactor Vessel Water Level - Low Low Function or the Condensate Storage Tank Water Level - Low Function cannot maintain initiation capability, instead of requiring immediate action to place the appropriate channel in the trip condition when more than one channel is inoperable.</p>			
<p>3.3.5.2 L.2</p>	<p>CTS 3.5.D.3 states that the controls for the automatic transfer of the pump suction may be inoperable for 30 days, if the pump suction is aligned to the suppression pool. Under the same conditions in the ITS, ITS 3.3.5.2 Required Action D.2.2 will allow this lineup for an unlimited period of time. This changes the CTS by allowing the RCIC pump suction to be aligned to the suppression pool indefinitely.</p>	<p>3.3.5.2 Required Action D.2.2</p>	<p>3.5.D.3</p>	<p>3</p>
<p>3.3.5.2 L.3 BSI 1.e</p>	<p style="text-align: center;">*** THIS ITEM IS A BSI *** *** Please see separate safety review and safety evaluation ***</p> <p>CTS Table 3.2.8 specifies the "Trip Setting" for the Condensate Storage Tank Level - Low for two tank and one tank operations. The Trip Settings of CTS Table 3.2.8 Function C.1 have been modified to reflect a new Allowable Value as indicated for ITS Table 3.3.5.2-1 Function 3. In addition, the Allowable Value for this Function only specifies a single Allowable Value, which is applicable for both one tank and two tank operations. This changes the CTS by requiring the RCIC instrumentation to be set consistent with the new "Allowable Value." The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC A.8.</p>	<p>Table 3.3.5.2-1 Function 3</p>	<p>Table 3.2.8 Function C.1</p>	<p>10</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6.1 L.1	CTS Table 3.2.1 Function 2.a requires the Low Reactor Water Level Function to be Applicable when the primary containment is required to be OPERABLE (i.e., MODES 1, 2, and 3 as described in DOC M.1). ITS Table 3.3.6.1-1 Function 6.b, the RHR SDC Isolation Reactor Vessel Water Level - Low Function, maintains the MODE 3 Applicability requirement, but does not maintain the MODES 1 and 2 Applicability requirements. This changes the CTS by deleting the requirement for the Reactor Vessel Water Level - Low Function for RHR SDC Isolation to be OPERABLE in MODES 1 and 2.	Table 3.3.6.1-1 Function 6.b	Table 3.2.1 Function 2.a	2
3.3.6.1 L.2	CTS Table 3.2.1 Note (2) provides the Actions for inoperable primary containment isolation instrumentation channels. When one instrument channel is inoperable (in one or more Functions), CTS Table 3.2.1 Note (2)(a) requires the inoperable channel(s) or trip system to be placed in trip within 12 hours. When more than one instrument channel is inoperable (for one or more Functions), CTS Table 3.2.1 Note (2)(b) requires the immediate placement of the appropriate channels in the tripped condition. ITS 3.3.6.1 ACTION A covers the condition of one or more required channels inoperable and requires channels that are common with the Reactor Protection System (RPS) channels (ITS Table 3.3.6.1-1 Functions 2.a, 2.b, 5.c, 6.b, 7.a, and 7.b are associated with RPS) to be placed in trip in 12 hours and all other channels to be placed in trip in 24 hours. ITS 3.3.6.1 ACTION B covers the condition of one or more Functions with primary containment isolation capability not maintained and requires the restoration of primary containment isolation capability within 1 hour. In addition, ITS 3.3.6.1 ACTIONS Note 2 allows separate Condition entry for each inoperable channel. This changes the CTS by: a) providing a specific Completion Time for each inoperable channel (i.e., from the time the channel became inoperable not when other channels for the same Function became inoperable); b) extending the time to restore inoperable channels not associated with RPS from 12 hours to 24 hours; c) allowing multiple channels in a Function to be inoperable (and allowing either 12 hours or 24 hours to restore the inoperable channel in the Function), provided primary containment isolation capability is not lost for the Function; and d) extending the time to restore primary containment isolation capability for a Function from immediately to 1 hour.	3.3.6.1 ACTIONS Note 2, 3.3.6.1 ACTIONS A and B	Table 3.2.1 Note 2	3
3.3.6.1 L.3	CTS Table 3.2.1 Required Conditions (Note *) requires, in part, the associated penetration flow path to be isolated when the actions of Note (2) are not met. However, this action does not include a provision, similar to that allowed for CTS 3.7.D.2.a and b, that isolated valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.3.6.1 ACTIONS Note 1 allows any primary containment penetration flow path to be unisolated intermittently under administrative controls. This changes the CTS by allowing the containment isolation penetrations to be opened under administrative controls when primary containment isolation valves have been closed as a result	3.3.6.1 ACTIONS Note 1	None	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6.1 L.4	of inoperable primary containment instrument channels. If CTS Table 3.2.1 Function 1.a, 1.b, or 1.c channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition A to be taken (since this is the Required Condition listed in Table 3.2.1 for Functions 1.a, 1.b, and 1.c). CTS Table 3.2.1 Required Condition A requires the Group 1 isolation valves to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 Required Action D.1 only requires isolation of the associated main steam lines. This changes the CTS by only requiring some of the Group 1 main steam isolation valves to be closed.	3.3.6.1 Required Action D.1	Table 3.2.1 Required Condition A	4
3.3.6.1 L.5	If CTS Table 3.2.1 Function 1.a, 1.b, or 1.c channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition A to be taken (since this is the Required Condition listed in Table 3.2.1 for Functions 1.a, 1.b, and 1.c). CTS Table 3.2.1 Required Condition A requires the Group 1 isolation valves to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 ACTION D provides an option to be in MODE 3 within 12 hours (Required Action D.2.1) and to be in MODE 4 within 36 hours (Required Action D.2.2) in lieu of closing the Group 1 valves. This changes the CTS by providing an alternate action to shut down the unit to MODE 4 in lieu of closing the Group 1 isolation valves.	3.3.6.1 Required Actions D.2.1 and D.2.2	Table 3.2.1 Required Condition A	4
3.3.6.1 L.6	If CTS Table 3.2.1 Function 2.a channels are inoperable and the requirements of CTS Table 3.2.1 Notes (2)(a) and (2)(b) cannot be met, then Table 3.2.1 Note (2)(c) requires Required Condition C to be taken (since this is the Required Condition listed in Table 3.2.1 for Function 2.a). CTS Table 3.2.1 Required Condition C requires the isolation valves of RHR Shutdown Cooling System to be closed. Under similar conditions in the ITS (i.e., the Required Actions and associated Completion Times of ACTIONS A and B not met), ITS 3.3.6.1 ACTION I requires the immediate initiation of action to restore the channel to OPERABLE status (ITS 3.3.6.1 Required Action I.1) or the immediate initiation of action to isolate the Residual Heat Removal (RHR) Shutdown Cooling System (ITS 3.3.6.1 Required Action I.2). This changes the CTS by providing an option to restore the inoperable channel to OPERABLE status instead of isolating the penetration.	3.3.6.1 Required Action I.1	Table 3.2.1 Required Condition C	4
3.3.6.1 L.7	CTS Table 4.1.1 specifies the requirements for the functional test of the High Drywell Press and Low Reactor Water Level Functions, and requires testing of the "Trip Channel" and "Alarm." ITS SR 3.3.6.1.2 requires the performance of a CHANNEL FUNCTIONAL TEST, but does not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm."	SR 3.3.6.1.2	Table 4.1.1 (for High Drywell Pressure and Low Reactor Water Level)	6

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6.1 L.8	CTS Table 4.1.2 provides the calibration method (i.e., pressure standard) for the High Drywell Pressure and Low Reactor Water Level channels. ITS 3.3.6.1 does not include this information in the associated SRs. This changes the CTS by deleting the calibration method from the CTS.	None	Table 4.1.2 (for High Drywell Pressure and Low Reactor Water Level)	6
3.3.6.1 L.9 BSI 1.g (in part)	<p style="text-align: center;">*** SOME ITEMS ARE BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>ITS Functions 4.a and 6.a are BSIs.</p> <p>CTS Table 3.2.1 specifies the "Trip Settings" for the primary containment isolation instrumentation. The "Trip Settings" value of CTS Table 3.2.1 Functions 1.b, 1.d, 5.a, 5.c, and 6.a have been modified to reflect new Allowable Values as indicated in ITS Table 3.3.6.1-1 Functions 1.b, 1.c, 4.a, 4.b, and 6.a. This changes the CTS by requiring the primary containment isolation instrumentation Functions to be set consistent with the new "Allowable Value." The change in the term "Trip Settings" to "Allowable Value" is discussed in DOC A.13.</p>	Table 3.3.6.1-1 Functions 1.b, 1.c, 4.a, 4.b, and 6.a	Table 3.2.1 Functions 1.b, 1.d, 5.a, 5.c, and 6.a	10
3.3.6.2 L.1	CTS Table 3.2.4 Note (2) (b) covers the condition when more than one channel associated with any secondary containment isolation Function is inoperable in the same trip system. For Functions 1 and 2, it requires the unit to place the associated channels or Trip System in trip. For Functions 3 and 4, it requires (via Required Conditions A and B) immediate action (using normal operating procedures) to isolate the reactor building ventilation system and to have the standby gas treatment system operating or to place the unit in a condition where the secondary containment is not required. ITS 3.3.6.2 ACTION B only requires entry when one or more Functions do not have isolation capability and it requires the restoration of isolation capability within 1 hour. If this cannot be met, ITS 3.3.6.2 ACTION C requires the isolation of the associated penetration flow path or the declaration that the secondary containment isolation valves are inoperable, and either requires the placement of the associated SGT subsystem in operation or the declaration that the SGT subsystem is inoperable. This changes the CTS in several ways: (a) it only requires entry when secondary containment isolation capability is lost in both trip systems; (b) it allows 1 hour to restore isolation capability; (c) it allows an additional hour to perform the isolation function if isolation capability cannot be restored within 1 hour; and (d) instead of providing the option to establish conditions where secondary containment is not required, an option to declare inoperable the associated secondary containment isolation valves or SGT subsystem is allowed.	3.3.6.2 ACTIONS B and C	Table 3.2.4 Note (2) (b)	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3.6.2 L.2	CTS Table 4.1.1 specifies the requirements for the functional test of the High Drywell Pressure Function, and requires testing of the "Trip Channel" and "Alarm." ITS SR 3.3.6.2.2 requires the performance of a CHANNEL FUNCTIONAL TEST, but does not specify any specific requirements for the test. This changes the CTS by deleting the specific channel functional test requirements to test the "Trip Channel and Alarm."	SR 3.3.6.2.2	Table 4.1.1 (for High Drywell Pressure)	6
3.3.6.2 L.3	CTS Table 4.1.2 provides the calibration method (i.e., pressure standard) for the High Drywell Pressure Function. ITS SR 3.3.6.2.4 requires performance of a CHANNEL CALIBRATION, but does not include this calibration method information. This changes the CTS by deleting the calibration method from the CTS.	None	Table 4.1.2 (for High Drywell Pressure)	6
3.3.6.3 L.1	CTS Table 3.2.7 Required Condition A specifies actions for one inoperable trip system and allows 72 hours to restore the trip system to OPERABLE status. If this cannot be met, the unit must reduce reactor pressure to less than 110 psig and reactor water temperature to less than 345°F within 24 hours. CTS Table 3.2.7 Required Condition B specifies actions for two inoperable trip systems and requires reactor pressure to be reduced to less than 110 psig and reactor water temperature to less than 345°F within 24 hours. ITS 3.3.6.3 ACTION A specifies actions for one or more channels inoperable in one or more Functions, and requires the declaration that the associated LLS valve is inoperable within 1 hour from discovery of loss of LLS valve initiation capability in both trip systems (Required Action A.1) and the restoration of all channels to OPERABLE status within 72 hours (Required Action A.2). If either of these Required Actions is not met, ITS 3.3.6.3 ACTION B requires the immediate declaration that the LLS valve(s) are inoperable. Once a single LLS valve is declared inoperable, ITS 3.6.1.5 will allow 14 days to restore the valve. Furthermore, if the LLS valve is not restored, or if more than one LLS valve is declared inoperable, ITS 3.6.1.5 will allow 12 hours to be in MODE 3 and 36 hours to be in MODE 4. This changes the CTS by: (a) allowing 1 hour to restore LLS valve automatic trip capability when both trip systems associated with a LLS valve are inoperable prior to requiring the LLS valve to be declared inoperable; b) allowing up to 14 days to restore a single LLS valve to OPERABLE status (after entering the ACTIONS of ITS 3.6.1.5; and c) allowing 36 hours to exit the Applicability once a unit shutdown is required in lieu of the current 24 hours. The change to the Applicability is discussed in DOC M.1.	3.3.6.3 ACTIONS A and B	Table 3.2.7 Required Conditions A and B	3
3.3.6.3 L.2	CTS Table 3.2.7 Function 2 specifies the Low-Low Set Pressure opening and closing Trip Settings for the LLS valves. A pressure range (± 14 psig) is provided for both the opening and closing pressures. ITS Table 3.3.6.3-1 Function 2 only specifies the upper limit for the opening and closing pressure Allowable Values. The change in the term "Trip Setting" to "Allowable Value" is discussed in DOC	Table 3.3.6.3-1 Function 2	Table 3.2.7 Function 2	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	A.6. This changes the CTS by deleting the lower limit for the Low-Low Set Pressure opening and closing Trip Settings.			
3.3.6.3 L.3	ITS 3.3.6.3 Note 2 to the Surveillance Requirements states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains LLS initiation capability. This allowance is not specified in the CTS. This changes the CTS by adding an allowance to delay entry into associated Conditions and Required Actions by up to 6 hours, provided the associated Function maintains LLS initiation capability.	3.3.6.3 Surveillance Requirements Note 2	None	4
3.3.7.1 L.1	When a Control Room Radiation channel is inoperable, CTS Table 3.2.9 Required Condition A allows 1 hour to initiate and maintain operation of the CREF subsystem in the pressurization mode of operation or Required Condition B requires the reactor water temperature to be reduced to below 212°F within 24 hours. When one or two channels are inoperable, ITS 3.3.7.1 ACTION A requires within 1 hour either the declaration that the associated CREF subsystem is inoperable or placement of the associated CREF subsystem in the pressurization mode of operation. This changes the CTS by allowing the associated CREF subsystem to be declared inoperable within 1 hour, and subsequently taking the Actions of ITS 3.7.4 in lieu of shutting down the unit in 24 hours.	3.3.7.1 ACTION A	Table 3.2.9 Required Conditions A and B	4
3.3.8.1 L.1	CTS Table 3.2.6 Note (1) provides the Action for inoperable required LOP instrumentation channels. When a channel is inoperable, the appropriate channels or systems must be placed in the tripped condition or (via Required Condition A) the plant must be in Cold Shutdown within 24 hours. ITS 3.3.8.1 ACTION A covers the condition when one or more channels are inoperable and requires the channel to be placed in trip within 1 hour. If this ACTION is not met, ITS 3.3.8.1 ACTION B requires the associated EDG to be declared inoperable immediately. This changes the CTS by providing an explicit time (1 hour) to place a channel in the tripped condition and allowing the associated EDG to be declared inoperable instead of requiring the unit to be in Cold Shutdown within 24 hours.	3.3.8.1 ACTIONS A and B	Table 3.2.6 Note (1), including Required Condition A	3
3.3.8.1 L.2	ITS 3.3.8.1 Surveillance Requirements Note 2 states that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 2 hours, provided the associated Function maintains EDG initiation capability. CTS Table 4.2.1 and CTS Table 3.2.6 do not provide this allowance. This changes the CTS by providing the 2 hour allowance to perform Surveillances.	3.3.8.1 Surveillance Requirements Note 2	None	1
3.3.8.2 L.1	CTS 3.1.C.3 covers the condition when both RPS electric power monitoring channels for one or both RPS buses are inoperable, and specifies the removal of the associated power supply(s) within 30 minutes. ITS 3.3.8.2 ACTION B covers the same condition, and allows 1 hour to remove the associated power supply(s)	3.3.8.2 ACTION B	3.1.C.3	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	from service. This changes the CTS by extending the time to remove the associated power supply(s) from service when both assemblies associated with one or both inservice power supplies are inoperable.			
3.4.2 L.1	CTS 4.6.G states, in part, that whenever there is recirculation flow with the reactor operating, jet pumps shall be demonstrated OPERABLE daily. ITS SR 3.4.2.1 Note 1 states the jet pump OPERABILITY Surveillance does not have to be performed until 4 hours after the associated recirculation loop is in operation. This changes the CTS by allowing a short time after the recirculation loop is placed in operation to evaluate whether or not the jet pumps are OPERABLE.	SR 3.4.2.1 Note 1	4.6.G	7
3.4.2 L.2	CTS 4.6.G requires the jet pumps OPERABILITY Surveillance to be performed in the "Run" mode. ITS SR 3.4.2.1 requires the same verification to be performed; however, its performance may be delayed until 24 hours after > 25% RTP, as described in Note 2. This changes the CTS by delaying the performance of the Surveillance until 24 hours after exceeding a THERMAL POWER of 25% RTP.	SR 3.4.2.1 Note 2	4.6.G	7
3.4.2 L.3	CTS 4.6.G.1, in part, requires the jet pump OPERABILITY Surveillance to be performed daily and following any unexplained change in core flow, jet pump loop flow, recirculation loop flow, or core plate differential pressure. ITS SR 3.4.2.1 only requires the Surveillance to be performed every 24 hours. This changes the CTS by deleting the requirement to perform the jet pump OPERABILITY Surveillance following the above changes in unit conditions.	SR 3.4.2.1	4.6.G.1	7
3.4.3 L.1	CTS 3.6.E.1 states, in part, that seven S/RVs shall be OPERABLE. It also states that 8 S/RVs shall be set at ≤ 1120 psig. ITS SR 3.4.3.1 states that the required S/RVs shall be set to 1109 ± 33.2 psig. In addition, this Surveillances states "Following testing, lift settings shall be within $\pm 1\%$." This changes the CTS by allowing the S/RVs to be within $+ 3\%$ of the nominal setpoint of 1109 during operation, and only after testing are the S/RVs required to be set to $+ 1\%$ of 1109 psig (i.e., 1120 psig). The addition of the minimum allowed setpoint is discussed in DOC M.2.	SR 3.4.3.1	3.6.E.1	1
3.4.3 L.2	CTS 3.6.E does not provide any specific time for restoring one or two required inoperable S/RVs; an immediate plant shutdown is required by CTS 3.6.E.2. ITS 3.4.3 ACTION A covers the condition when one or two required S/RVs are inoperable and allows 14 days to restore the S/RVs to OPERABLE status. This changes the CTS by adding an allowance to operate for up to 14 days when one or two required S/RVs are inoperable.	3.4.3 ACTION A	3.6.E.2	4
3.4.3 L.3	CTS 3.6.E.2 states that if Specification 3.6.E.1 is not met, initiate an orderly shutdown and have reactor coolant pressure and temperature reduced to 110 psig or less and 345°F or less. ITS 3.4.3 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the CTS by requiring the unit	3.4.3 ACTION B	3.6.E.2	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	to be in MODE 3 in 12 hours and extends the time to be outside of the Applicability of the Specification from 24 hours to 36 hours. The change to be in MODE 4 in lieu of the current requirement to reduce reactor coolant pressure to 110 psig or less and reactor coolant temperature to 345°F or less is discussed in DOC M.1.			
3.4.6 L.1	CTS 4.6.C.1.(a) requires a reactor coolant sample be taken and analyzed for radioactive iodines of I-131 through I-135 every 96 hours during power operation. ITS SR 3.4.6.1 requires verifying DOSE EQUIVALENT I-131 specific activity every 7 days when in MODE 1. This changes the CTS by extending the Surveillance Frequency from 96 hours to 7 days and eliminates the requirement to perform the Surveillance in MODE 2 above 1% Rated Thermal Power (RTP).	SR 3.4.6.1	4.6.C.1.(a)	7
3.4.6 L.2	CTS 3.6.C does not specify Applicability requirements. The Applicability of MODES 1, 2, and 3 is inferred in the CTS 3.6.C.4 Action to place the plant in cold shutdown when the Specification is not met. ITS 3.4.6 Applicability is MODE 1, and MODES 2 and 3 with any main steam line not isolated. In addition, as a result of this change, ITS 3.4.6 Required Action B.2.1 allows all main steam lines to be isolated in lieu of a shutdown to MODE 4 (i.e., cold shutdown). This changes the CTS by specifying that MODES 2 and 3 are applicable only when the main steam lines are not isolated.	3.4.6 Applicability	3.6.C.4	2
3.4.6 L.3	CTS 4.6.C.1.(c) requires a reactor coolant sample be taken and analyzed for radioactive iodines when the main condenser offgas system pretreatment monitors indicate an increase in radioactive gaseous effluents of 25 percent or 5000 µCi/sec, whichever is greater, during steady state reactor operation. CTS 4.6.C.1.(d) requires an isotopic analysis of reactor coolant samples be made at least once per month. CTS 4.6.C.1.(e) requires a reactor coolant sample be taken within 24 hours of any reactor startup and analyzed for radioactive iodines I-131 through I-135 whenever the steady state radioiodine concentration of prior operation is greater than 1 percent but less than 10 percent of Specification 3.6.C.1.(a). CTS 4.6.C.1.(f) requires a reactor coolant sample be taken daily and prior to any reactor startup and analyzed for radioactive iodines I-131 through I-135 whenever the steady state radioiodine concentration of prior operation is greater than 10 percent of Specification 3.6.C.1.(a). These SRs are not retained in the ITS. This changes the CTS by deleting SRs to sample and analyze for radioactive iodines that are event based and deleting a Surveillance that requires a complete isotopic analysis monthly.	None	4.6.C.1.(c), 4.6.C.1.(d), 4.6.C.1.(e), 4.6.C.1.(f)	5
3.4.6 L.4	CTS 3.6.C.4 requires an orderly shutdown be initiated and the reactor be in cold shutdown condition within 24 hours if the iodine concentration limit is not met. ITS 3.4.6 ACTION A allows 48 hours to restore the iodine concentration to within limits (ITS 3.4.6 Required Action A.2) prior to requiring a unit shutdown, provided	3.4.6 ACTION A	3.6.C.4	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	the iodine concentration is $\leq 4.0 \mu\text{Ci/gm}$. However, during this 48 hour period, a determination of DOSE EQUIVALENT I-131 is required every 4 hours (ITS 3.4.6 Required Action A.1). In addition, during this 48-hour period, changes in MODES or other specified conditions in the Applicability are allowed (ITS 3.4.6 Required Action A Note). This changes the CTS by allowing 48 hours, under certain conditions, to restore iodine concentration to within limits prior to requiring a unit shutdown. The change also allows changes in MODES or other specified conditions in the Applicability during this 48 hour time.			
3.4.6 L.5	CTS 3.6.C.4 requires an orderly shutdown be initiated and the reactor be in cold shutdown condition within 24 hours if the iodine concentration limit is not met. ITS 3.4.6 Required Actions B.2.2.1 and B.2.2.2 require the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours, respectively. This changes the CTS by adding a requirement to be in MODE 3 in 12 hours and by extending the time allowed to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours.	3.4.6 Required Actions B.2.2.1 and B.2.2.2	3.6.C.4	3
3.4.9 L.1	CTS 3.6.A.2 states that the pump in an idle recirculation loop shall not be started unless the temperature of the coolant within the idle recirculation loop is within 50°F of the reactor coolant temperature. ITS LCO 3.4.9 and ITS SR 3.4.9.3 includes the same requirement; however, a Note has been included in ITS SR 3.4.9.3 that states the Surveillance is only required to be met in MODES 1, 2, 3, and 4 during recirculation pump startup. This changes the CTS by excluding the idle loop temperature requirement during MODE 5 and when fuel is not in the reactor.	3.6.A.2	SR 3.4.9.3 Note	2
3.4.9 L.2	CTS 4.6.A requires a verification of the heatup and cooldown rate every 15 minutes. CTS 4.6.B.1 requires a verification that the P/T limits are within limits every 15 minutes during inservice hydrostatic or leak testing. ITS SR 3.4.9.1 requires the RCS pressure, RCS temperature, and RCS heatup and cooldown rates to be within the applicable limits every 30 minutes. This changes the CTS by extending the Surveillance Frequency from every 15 minutes to every 30 minutes.	SR 3.4.9.1	4.6.A, 4.6.B.1	7
3.4.9 L.3	CTS 3.6.B.4 states that the reactor vessel head bolting studs shall not be under tension unless the temperature of the vessel head flange and the head are $\geq 70^\circ\text{F}$. CTS 4.6.B.4 states that when the reactor vessel head studs are under tension and the reactor is in the Cold Shutdown Condition, the reactor vessel shell flange temperature shall be permanently recorded. ITS SR 3.4.9.4, SR 3.4.9.5, and SR 3.4.9.6 include the requirement to verify the same limit specified in CTS 3.6.B.4 (reactor vessel flange and head flange temperatures are $\geq 70^\circ\text{F}$). ITS SR 3.4.9.4 requires a verification that the reactor vessel flange and head flange temperatures are within limits every 30 minutes when tensioning the reactor vessel head bolting studs. ITS SR 3.4.9.5 requires the same verification	SR 3.4.9.4, SR 3.4.9.5, SR 3.4.9.6	4.6.B.4	7

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>every 30 minutes; however, the verification is not required to be performed until 30 minutes after RCS temperature is $\leq 80^{\circ}\text{F}$ in MODE 4. ITS SR 3.4.9.6 requires the same verification every 12 hours; however, the verification is not required to be performed until 12 hours after RCS temperature is $\leq 100^{\circ}\text{F}$ in MODE 4. This changes the CTS by deleting the requirement to permanently record the reactor vessel shell flange temperature at all times when the reactor vessel head studs are under tension and the reactor is in MODE 4, and it includes a requirement to verify the limits are met at periodic Frequencies.</p>			
<p>3.5.1 L.1</p>	<p>CTS 3.5.A.3.c covers the inoperabilities associated with one low pressure pump or valve associated with CS or LPCI to be inoperable with an ADS valve inoperable. ITS 3.5.1 ACTION K also allows an ADS valve to be inoperable with the same inoperabilities associated with CS and LPCI specified in CTS 3.5.A.3.c (ITS 3.5.1 ACTION A and ACTION B), however it also covers the inoperability of one entire LPCI subsystem due to both pumps being inoperable (ITS 3.5.1 ACTION B (first Condition)) and one LPCI pump in each subsystem (ITS 3.5.1 ACTION C). This changes the CTS by allowing more ECCS components to be inoperable when an ADS valve is inoperable.</p>	<p>3.5.1 ACTION K</p>	<p>3.5.A.3.c</p>	<p>4</p>
<p>3.5.1 L.2</p>	<p>*** This change requires further NRC staff review (TAC No. MD1294) and is discussed in Section C of the safety evaluation ***</p> <p>CTS 3.5.A.3.f covers the inoperability associated with both LPCI injection paths, and allows 72 hours to restore a LPCI injection path to OPERABLE status. ITS 3.5.1 ACTION D covers the condition of two inoperable LPCI subsystems. This would change the CTS by allowing 3 or 4 LPCI pumps (instead of two injection paths) to be inoperable for up to 72 hours.</p>	<p>3.5.1 ACTION D</p>	<p>3.5.A.3.f</p>	<p>4</p>
<p>3.5.1 L.3</p>	<p>If the requirements or conditions of CTS 3.5.A.1, 3.5.A.2, or 3.5.A.3 cannot be met, CTS 3.5.A.4 requires an orderly shutdown of the reactor to be initiated and to place the reactor in a condition in which the affected equipment is not required to be OPERABLE within 24 hours. ITS 3.5.1 ACTION E provides the shutdown actions for when the low pressure injection/spray systems are not restored to OPERABLE status in the required time and requires the reactor to be in MODE 3 in 12 hours and MODE 4 in 36 hours. ITS 3.5.1 ACTION L provides the shutdown action for when the high pressure ECCS components (HPCI and ADS) are not restored to OPERABLE status within the required time and requires the reactor to be in MODE 3 in 12 hours and to reduce reactor steam dome pressure to ≤ 150 psig within 36 hours. ITS 3.5.1 ACTION M covers the condition when two or more low pressure ECCS injection/spray subsystems are inoperable for reasons other than Condition C, D, or F or when HPCI and ADS are concurrently inoperable, and requiring entry into LCO 3.0.3 immediately. LCO 3.0.3 requires initiation of</p>	<p>3.5.1 ACTIONS E, L, and M</p>	<p>3.5.A.4</p>	<p>3</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	action within 1 hour to be in MODE 2 in 7 hours, to be in MODE 3 in 13 hours, and to either be in MODE 4 or reduce reactor steam dome pressure to ≤ 150 psig (as applicable) in 37 hours. This changes the CTS by adding a requirement to be in MODE 2 in 7 hours (for inoperabilities specified in Condition M only) and to be in MODE 3 in 12 hours (or 13 hours for inoperabilities specified in Condition M only), and by extending the time the unit must be out of the Applicability of the Specification from 24 hours to 36 hours or 37 hours (for inoperabilities specified in Condition M only).			
3.5.1 L.4	CTS 4.5.A.4 requires the performance of a simulated automatic actuation test of all ECCS subsystems. ITS SR 3.5.1.10 requires verification that each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal. ITS SR 3.5.1.11 requires verification that each ADS valve actuates on an actual or simulated automatic initiation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.5.1.10, SR 3.5.1.11	4.5.A.4	6
3.5.1 L.5	CTS 3.5.A.3 does not cover the condition of HPCI inoperable concurrent with any low pressure ECCS subsystems inoperable. Thus, CTS 3.5.A.4 requires a unit shutdown when in this condition. ITS 3.5.1 ACTION I covers the condition of HPCI inoperable concurrent with the inoperabilities in ITS 3.5.1 ACTION A, B, or C (one LPCI pump inoperable, one LPCI subsystem inoperable for reasons other than Condition A, one Core Spray subsystem inoperable, or one LPCI pump inoperable in each subsystem) and requires either the HPCI System or the low pressure ECCS injection/spray subsystem(s) to be restored to OPERABLE status within 72 hours. This changes the CTS by allowing low pressure ECCS components be inoperable for a short period of time concurrent with the HPCI System being inoperable prior to requiring a unit shutdown.	3.5.1 ACTION I	3.5.A.4	4
3.5.1 L.6	ITS LCO 3.5.1 includes a Note that states the low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the Residual Heat Removal (RHR) shutdown cooling supply isolation interlock in MODE 3, if capable of being manually realigned and not otherwise inoperable. CTS 3.5.A does not include this explicit allowance. This changes the CTS by adding this explicit allowance.	LCO 3.5.1 Note	None	1
3.5.2 L.1	CTS 3.5.E.1 and 3.5.E.2 require low pressure ECCS subsystems to be OPERABLE during OPDRVs. While no actions are specified if a low pressure ECCS subsystem becomes inoperable during OPDRVs, it is implicit that OPDRVs would have to be suspended. ITS 3.5.2 ACTION A allows one required low pressure ECCS subsystem to be inoperable for up to 4 hours (i.e., it requires restoration of the inoperable low pressure ECCS subsystem within 4 hours), prior to requiring OPDRVs to be suspended. This changes the CTS by allowing	3.5.2 ACTION A	3.5.E.1, 3.5.E.2	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	operation to continue for up to 4 hours with an inoperable low pressure ECCS subsystem prior to requiring the suspension of OPDRVs.			
3.5.2 L.2	CTS 3.5.E.1, in part, requires all containment cooling subsystems to be OPERABLE during OPDRVs except as allowed by CTS 3.5.E.2. When the vessel head is removed, the spent fuel pool gates are open, and the fuel pool water level is maintained at a level of greater than or equal to 33 ft, CTS 3.5.E.2 allows the suppression chamber water level to be drained, if no more than one control rod drive housing or instrument thimble is opened. Thus, CTS 3.5.E.2 implies that when these conditions are not met in MODE 5, all containment cooling subsystems must be OPERABLE. The ITS does not require containment cooling subsystems to be OPERABLE in MODES other than MODES 1, 2, and 3. This changes the CTS by eliminating all requirements to have any containment cooling subsystems OPERABLE in these conditions.	None	3.5.E.2	1
3.5.2 L.3	CTS 3.5.E.1, in part, requires all low pressure ECCS subsystems to be OPERABLE during OPDRVs except as allowed in CTS 3.5.E.2. When irradiated fuel is in the vessel and the vessel head is removed (i.e., MODE 5), the spent fuel pool gates are open, and the fuel pool water level is maintained at a level of greater than or equal to 33 ft, CTS 3.5.E.2 allows the suppression chamber water level to be drained, provided that no more than one control rod drive housing or instrument thimble is opened. This effectively allows all low pressure ECCS subsystems to be inoperable during these two specific types of OPDRVs (one control rod drive housing or instrument thimble is opened). ITS 3.5.2 will allow all low pressure ECCS subsystems to be inoperable for any type of OPDRV, provided the same requirements concerning spent fuel pool gates and water level are met. This changes the CTS by allowing any type of OPDRV during MODE 5 operations, not just the two listed in CTS 3.5.E.2, provided the spent fuel gates are removed and water level is within the limit.	3.5.2 Applicability	3.5.E.2	1
3.5.2 L.4	CTS 3.7.A.1.e requires the suppression pool water level to be within limit and CTS 4.7.A.1.e requires the verification that the suppression pool water level is within limit. CTS 3.7.A.1.e also only allows 2 hours to restore the suppression pool level to within limits before requiring the suspension of all OPDRVs. ITS SR 3.5.2.1.a requires the same verification; however, an option is provided to allow the condensate storage tank(s) water level to be met instead of the suppression pool level. However, only one required ECCS injection/spray subsystem may take credit for this option during OPDRVs. If the suppression pool level is not within limit, but the condensate storage tank water level is within the prescribed limits, ITS 3.5.2 ACTION A must be entered and 4 hours is allowed prior to requiring the initiation of action to suspend OPDRVs (ITS 3.5.2 ACTION B). This changes the CTS by providing an option to allow the condensate storage tank(s) to be the water source for the required ECCS subsystems. Changes to the	SR 3.5.2.1.a	3.7.A.1.e	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	Required Actions are discussed in DOC L.5.			
3.5.2 L.5	CTS 3.7.A.1.e requires the suppression pool water level to be within limit and CTS 4.7.A.1.e requires the verification that the suppression pool water level is within limit. CTS 3.7.A.1.e also only allows 2 hours to restore the suppression pool level to within limits before requiring the suspension of all OPDRVs. ITS SR 3.5.2.1.a requires the same verification; however, an option is provided to allow the condensate storage tank(s) water level to be met instead of the suppression pool level. However, only one required ECCS injection/spray subsystem may take credit for this option during OPDRVs. If the suppression pool level is not within limit, but condensate storage tank water level is within prescribed limits, ITS 3.5.2 ACTION A must be entered and 4 hours is allowed prior to requiring the initiation of action to suspend OPDRVs (ITS 3.5.2 ACTION B). This changes the CTS by extending the time to stop OPDRVs from 2 hours to 4 hours as long as the condensate storage tank water level is within the prescribed limits.	3.5.2 ACTION A	3.7.A.1.e	3
3.5.2 L.6	ITS LCO 3.5.2 includes a Note that states one low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. CTS 3.5.E does not include this explicit allowance. This changes the CTS by adding this explicit allowance.	LCO 3.5.2 Note	None	1
3.5.2 L.7	CTS 3.7.A.1.e requires the suppression pool water level to be ≥ -4.0 and $\leq +3.0$ inches. ITS SR 3.5.2.1.a requires the suppression pool water level to be ≥ -3 ft. This changes the CTS by modifying the lower limit from ≥ -4.0 inches to ≥ -3 ft. The change to the upper suppression pool limit is discussed in DOC A.3.	SR 3.5.2.1.a	3.7.A.1.e	1
3.5.3 L.1	If the RCIC System is not restored within 14 days, or the RCIC System and HPCI System are concurrently inoperable, CTS 3.5.D.4 requires an orderly shutdown of the reactor to be initiated and the reactor to be placed in a condition in which the affected equipment is not required to be OPERABLE within 24 hours. ITS 3.5.3 ACTION B requires the reactor to be in MODE 3 in 12 hours and to reduce reactor steam dome pressure to ≤ 150 psig within 36 hours. This changes the CTS by adding a requirement to be in MODE 3 in 12 hours and by extending the time the unit must be out of the Applicability of the Specification from 24 hours to 36 hours.	3.5.3 ACTION B	3.5.D.4	3
3.5.3 L.2	CTS 4.5.D.2 requires the performance of a simulated automatic actuation test of the RCIC System. ITS SR 3.5.3.4 requires the verification that the RCIC System actuates on an actual or simulated automatic initiation signal. This changes the CTS by explicitly allowing the use of either an actual or simulated signal for the test.	SR 3.5.3.4	4.5.D.2	6

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.1 L.1	CTS 4.7.A.2.d requires a visual inspection of the interior surfaces of the drywell once each operating cycle for evidence of deterioration. CTS 4.7.A.1.c requires visual inspection of the accessible portions of the suppression chamber interior each refueling interval. ITS SR 3.6.1.1.1 requires visual examinations in accordance with the Primary Containment Leakage Rate Testing program. This changes the CTS by reducing the Frequency of the visual inspections (examination).	SR 3.6.1.1.1	4.7.A.2.d, 4.7.A.1.c	7
3.6.1.2 L.1	CTS 3.7.A.2.c states that with the primary containment air lock inoperable, "maintain" at least one air lock door closed. ITS 3.6.1.2 Required Action C.2 requires a verification that within "1 hour" an air lock door is closed. This changes the CTS by allowing 1 hour to close the air lock door, in lieu of the current immediate time (i.e., maintain).	3.6.1.2 Required Action C.2	3.7.A.2.c	3
3.6.1.2 L.2	CTS 3.7.A.2.c states that with an air lock inoperable (for any reason), maintain at least one air lock door closed and restore the air lock to OPERABLE status within 24 hours or the unit must be shutdown. ITS 3.6.1.2 provides separate ACTIONS for different inoperabilities of the air lock. With an airlock inoperable due to a single inoperable door, ITS 3.6.1.2 ACTION A allows operation for an unlimited amount of time, provided the OPERABLE air lock door is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that the OPERABLE air lock door remains locked closed. For air lock doors in high radiation areas or areas with limited access due to inerting, this 31 day verification can be performed by administrative means. In addition, the ACTION allows containment entry and exit for up to 7 days under administrative controls. With an air lock interlock mechanism inoperable, ITS 3.6.1.2 ACTION B allows operation for an unlimited amount of time, provided an OPERABLE door in the air lock is closed in 1 hour and locked closed in 24 hours, and a verification is performed every 31 days that an OPERABLE air lock door in the air lock remains locked closed. For air lock doors in high radiation areas or areas with limited access due to inerting, this 31 day verification can be performed by administrative means. In addition, containment entry and exit through the air lock is permissible (i.e., the closed and locked OPERABLE door can be opened) under the control of a dedicated individual. Finally, due to these new ACTIONS, ITS 3.6.1.2 ACTION C, which has actions similar to CTS 3.7.A.2.c (as modified by DOC L.1), only applies to an air lock that is inoperable for reasons other than an inoperable door or an inoperable interlock mechanism. For both of these new ACTIONS as well as ACTION C, as stated in ITS ACTIONS Note 1, entry and exit (i.e., the closed and locked OPERABLE air lock doors can be opened) is also permissible to perform repairs on the affected air lock components. This changes the CTS by allowing operation for an unlimited amount of time, with certain restrictions, for air locks that are inoperable due to an inoperable door or interlock mechanism.	3.6.1.2 ACTIONS Note 1, ACTIONS A and B, Condition C	3.7.A.2.c	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.1	CTS 3.7.D.3.b requires the associated penetration flow path to be isolated when a primary containment purge or vent valve is not within purge and vent valve leakage limits. However, this action does not include a provision, similar to that allowed for CTS 3.7.D.2.a and b, that isolated valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.6.1.3 ACTIONS Note 1 allows any primary containment penetration flow path, including the containment purge and vent valve flow paths, isolated due to a leakage limit not being met, to be unisolated intermittently under administrative controls. This changes the CTS by allowing the containment purge and vent valve penetrations to be opened under administrative controls when containment purge and vent valve leakage is not within limit.	3.6.1.3 ACTIONS Note 1	None	4
3.6.1.3 L.2	CTS 4.7.D.1.a requires the performance of a simulated automatic initiation test of all power operated and automatic initiated PCIVs. ITS SR 3.6.1.3.7 requires the verification that each automatic PCIV actuates to the isolation position on an actual or simulated automatic isolation signal. This changes the CTS by explicitly allowing the use of an actual signal for the test.	SR 3.6.1.3.7	4.7.D.1.a	6
3.6.1.3 L.3	CTS 3.7.D.2.a covers the condition of one or more penetration flow paths with one PCIV inoperable and allows reactor operation in the "run mode" to continue for a short period of time. CTS 3.7.D.2.b covers the condition of one or more penetration flow paths with two PCIVs inoperable and allows reactor operation in the "run mode" to continue for a short period of time. CTS 3.7.D.3.b covers the condition of one or more penetration flow paths with one or more containment purge and vent valves not within purge and vent valve leakage limits and allows reactor operation in the "run mode" to continue for a short period of time. The "run mode" is when the reactor mode switch is in the "run" position. CTS 3.7.D.1 is applicable in the reactor "power operating" conditions, which include when the mode switch is either in the "run" or "start-up" position when power is > 1% RTP (CTS 1.0.O). Therefore, if the unit is not in the "run mode" when a PCIV becomes inoperable, then CTS 3.7.D.4, which requires a unit shutdown to cold shutdown within 24 hours, would apply. The CTS does not allow unit operation to continue when the mode switch is in the "start-up" position using the allowances provided in CTS 3.7.D.2.a, 3.7.D.2.b, or 3.7.D.3.b. ITS 3.6.1.3 ACTIONS A, B, and C cover similar conditions as in CTS 3.7.D.2.a, 3.7.D.2.b, and 3.7.D.3.b, and allows continued operation (similar to that allowed by CTS 3.7.D.2.a, 3.7.D.2.b, and 3.7.D.3.b as modified by applicable ITS 3.6.1.3 DOCs) regardless of the initial position of the reactor mode switch. This changes the CTS by allowing operation to continue with inoperable PCIVs in any MODE, not just MODE 1 (i.e., the "run mode").	3.6.1.3 ACTIONS A, B, and C	3.7.D.2.a, 3.7.D.2.b, 3.7.D.3.b	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.4	CTS 3.7.D.2.a states that with one or more penetration flow paths with one PCIV inoperable, operation may continue provided that within the subsequent 4 hours (8 hours for MSIVs and 72 hours for EFCVs) at least one valve in each line having an inoperable valve is deactivated in the isolated condition. This action covers the condition for penetrations with either one or two PCIVs. ITS 3.6.1.3 ACTION C covers inoperabilities associated with penetrations with one PCIV and allows a 4 hour Completion Time to isolate the affected penetration, except for EFCVs and penetrations with a closed system and a 72 hour Completion Time to isolate the affected penetration for EFCVs and penetrations with a closed system. This changes the CTS by extending the Completion Time from 4 hours to 72 hours for an inoperable PCIV associated with a closed system.	3.6.1.3 ACTION C	3.7.D.2.a	4
3.6.1.3 L.5	CTS 4.7.D.2 and CTS 4.7.D.3 require verification that specified containment penetrations are closed. ITS 3.6.1.3 Required Actions A.2, C.2, and D.2 include a similar requirement, but contain a Note (Note 2) that allows isolation devices that are locked, sealed, or otherwise secured to be verified by use of administrative means. This changes the CTS by allowing certain isolation devices to not require physical verification.	3.6.1.3 Required Actions A.2, C.2, and D.2 Note 2	4.7.D.2, 4.7.D.3	4
3.6.1.3 L.6	CTS 3.7.D.3.a specifies that inerting and de-inerting operations permitted by TS 3.7.A.5.b shall be via the 18 inch purge and vent valves aligned to the Reactor Building plenum and vent, and that all other purging and venting, when primary containment integrity is required, shall be via the 2 inch purge and vent valve bypass line and the Standby Gas Treatment Systems. The ITS SR 3.6.1.3.1 Note states that the 18-inch primary containment purge and vent valves may be opened for inerting, de-inerting, pressure control, ALARA, air quality considerations for personnel entry, or Surveillances that require the valves to be open. This changes the CTS by allowing the 18 inch containment purge and vent valves to be opened under more conditions than in the CTS. The change to the requirement that the 18 inch purge and vent valves, when opened, be aligned to the Reactor Building plenum and vent is discussed in DOC LA.3.	SR 3.6.1.3.1 Note	3.7.D.3.a	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.3 L.7	<p>CTS 3.7.A.2.a.(1) includes the requirements for all "manual" PCIVs since the CTS definition of Primary Containment Integrity (1.0.P) includes these valves. If a manual valve that is supposed to be closed is open (i.e., inoperable), CTS 3.7.A.2.a.(4) applies. CTS 3.7.A.2.a.(4) states, in part, "If requirements of 3.7.A.2.a.(1) cannot be met, restore Primary Containment Integrity within one hour," or a unit shutdown is required. Thus, if one or more manual PCIVs are inoperable, 1 hour is allowed by the CTS to restore OPERABILITY. ITS 3.6.1.3 ACTIONS A, B, and C do not differentiate between automatic and manual valves and allow 1 hour, 4 hours, or 72 hours to isolate the affected penetration flow path (depending upon the number of valves inoperable in the penetration and the type of penetration), prior to requiring a unit shutdown. In addition, ITS 3.6.1.3 ACTIONS Notes 1, 2, 3, and 4 allow penetration flow paths to be unisolated intermittently under administrative controls, allow separate condition entry for each penetration flow path, require entry into the applicable Conditions and Required Actions for systems made inoperable by PCIVs, and require entry into the applicable Conditions and Required Actions for LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding the overall containment leakage rate acceptance criteria. This changes the CTS by providing 4 hours (for two valve penetrations with one valve inoperable or for one valve penetrations, that are not excess flow check valve or closed system penetrations, with one valve inoperable) or 72 hours (for one valve penetrations, that are excess flow check valve or closed system penetrations, with one valve inoperable) to isolate a penetration flow path affected by an inoperable non-automatic primary containment isolation valve and continue to operate with the penetration flow path isolated. This also changes the CTS by allowing penetration flow paths to be unisolated intermittently under administrative controls, allowing separate condition entry for each penetration flow path with an inoperable non-automatic PCIV, requiring entry into the applicable Conditions and Required Actions for systems made inoperable by inoperable non-automatic PCIVs, and requiring entry into the applicable Conditions and Required Actions for LCO 3.6.1.1, "Primary Containment," when leakage through a penetration flow path due to an inoperable non-automatic PCIV results in exceeding the overall containment leakage rate acceptance criteria.</p>	3.6.1.3 ACTIONS Notes 1, 2, 3, and 4 and ACTIONS A, B, and C	3.7.A.2.a.(4)	4
3.6.1.5 L.1	<p>CTS Table 3.2-7 Required Condition C allows 7 days to restore one inoperable Low-Low Set valve. ITS 3.6.1.5 ACTION A allows 14 days to restore the inoperable LLS valve to OPERABLE status. This changes the CTS by extending the time to restore an inoperable LLS valve from 7 days to 14 days.</p>	3.6.1.5 ACTION A	Table 3.2-7 Required Condition C	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.1.5 L.2	CTS Table 3.2-7 Required Condition C states, in part, that if the LLS valve cannot be made OPERABLE within 7 days, reactor coolant pressure and temperature must be reduced to less than 110 psig and less than 345°F in 24 hours. ITS 3.6.1.5 ACTION B requires the unit to be in MODE 3 in 12 hours and MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and extends the time to be outside of the Applicability of the Specification from 24 hours to 36 hours. The change to be in MODE 4 in lieu of the current requirement to reduce reactor coolant pressure to less than 110 psig and reactor coolant temperature to less than 345°F is discussed in DOC M.1.	3.6.1.5 ACTION B	Table 3.2-7 Required Condition C	3
3.6.1.6 L.1	CTS 3.7.A.3.b allows an inoperability in only one reactor building-to-suppression chamber vacuum breaker line for any reason. In addition, the vacuum breakers in the line must still be ensuring primary containment integrity is met (i.e., both valves in the line cannot be open). ITS 3.6.1.6 ACTIONS Note and ACTIONS A, B, and D, specify ACTIONS for when both lines have inoperable reactor building-to-suppression chamber vacuum breaker(s) and when one line has both vacuum breakers open. Specifically, ITS 3.6.1.6 ACTION A in combination with the ACTIONS Note will allow each line to have one vacuum breaker open for up to 72 hours, ITS 3.6.1.6 ACTION B will allow one or both lines to have two vacuum breakers open for up to 1 hour, and ITS 3.6.1.6 ACTION D will allow both lines to have one or more vacuum breakers inoperable for opening for up to 1 hour. This changes the CTS by allowing multiple vacuum breakers to be operable based on the reason for and proximity of the inoperability, and adding an ACTIONS Note to permit separate condition entry for each relief line.	3.6.1.6 ACTIONS Note, ACTIONS A, B, and D	3.7.A.3.b	4
3.6.1.6 L.2	CTS 3.7.A.3.c requires the unit to be placed in the cold shutdown condition within 24 hours if the inoperable reactor building-to-suppression chamber vacuum breaker cannot be restored to OPERABLE within 7 days. ITS 3.6.1.6 ACTION E requires the unit be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours.	3.6.1.6 ACTION E	3.7.A.3.c	3

Table L - Less Restrictive Changes

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

Table L - Less Restrictive Changes

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

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.2.1 L.5	CTS 4.7.A.1.d requires an extended visual examination of the suppression chamber before resuming power operation whenever there is indication of relief valve operation with a suppression pool temperature of $\geq 160^{\circ}$ F and the primary coolant system pressure is > 200 psig. The ITS does not include this Surveillance Requirement. This changes the CTS by deleting the Surveillance Requirement to perform a suppression chamber inspection based on special temperature and pressure conditions.	None	4.7.A.1.d	5
3.6.2.2 L.1	CTS 3.7.A.1.f requires the unit to be placed in the cold shutdown condition within 24 hours if the suppression pool water level requirements of CTS 3.7.A.1.e are not met. ITS 3.6.2.2 ACTION B requires the unit to be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time allowed to be in cold shutdown (i.e., MODE 4) from 24 hours to 36 hours.	3.6.2.2 ACTION B	3.7.A.1.f	3
3.6.2.3 L.1	When two RHR suppression pool cooling subsystems are inoperable, a unit shutdown is required by CTS 3.5.C.3; no time is provided to restore a subsystem. With two RHR suppression pool cooling subsystems inoperable, ITS 3.6.2.3 ACTION B will allow 8 hours to restore one inoperable RHR suppression pool cooling subsystem prior to requiring a unit shutdown. This changes the CTS by allowing 8 hours to restore one of two inoperable RHR suppression pool cooling subsystems prior to requiring a unit shutdown.	3.6.2.3 ACTION B	3.5.C.3	4
3.6.2.3 L.2	CTS 3.5.C.3 requires the unit to be shut down and reactor water temperature reduced to less than 212° F within 24 hours if the requirements of CTS 3.5.C.1 or CTS 3.5.C.2 are not met. Under similar conditions (as modified by DOC L.1), ITS 3.6.2.3 ACTION C requires the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to reduce reactor water temperature to $< 212^{\circ}$ F (i.e., MODE 4) from 24 hours to 36 hours.	3.6.2.3 ACTION C	3.5.C.3	3
3.6.4.1 L.1	CTS 3.7.C.2.c requires the secondary containment to be OPERABLE when the fuel cask is being moved within the reactor building and CTS 3.7.C.4.b.3 provides actions when this is not met. ITS 3.6.4.1 does not include this requirement. This changes the CTS by deleting the requirement to maintain the secondary containment OPERABLE when the fuel cask is being moved within the reactor building.	None	3.7.C.2.c, 3.7.C.4.b.3	1
3.6.4.1 L.2	CTS 3.7.C.4 does not provide any explicit time to restore the secondary containment to OPERABLE status when it is found inoperable prior to requiring a unit shutdown. Under similar conditions, ITS 3.6.4.1 ACTION A provides 4 hours to restore the secondary containment to OPERABLE status in MODE 1, 2, and 3 prior to requiring a unit shutdown. This changes the CTS by providing an explicit ACTION to allow time to restore an inoperable secondary containment to OPERABLE status prior to requiring a unit shutdown.	3.6.4.1 ACTION A	None	4
3.6.4.1	CTS 4.7.C.1.a requires the secondary containment capability test to be performed	SR 3.6.4.1.4	4.7.C.1.a	7

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
L.3	"prior to refueling." ITS SR 3.6.4.1.4 includes a similar test, but does not include the mode restrictions for performing the required test. This changes the CTS by deleting the requirement to perform the Surveillance "prior to refueling."			
3.6.4.2 L.1	CTS 3.7.C.2.c requires the SCIVs to be OPERABLE when the fuel cask is being moved within the reactor building and CTS 3.7.C.4.b.3 provides actions when this is not met. ITS LCO 3.6.4.2 does not include this requirement. This changes the CTS by deleting the requirement to maintain the SCIVs OPERABLE when the fuel cask is being moved within the reactor building.	None	3.7.C.2.c, 3.7.C.4.b.3	1
3.6.4.2 L.2	CTS 3.7.C.3 requires the associated penetration flow path to be isolated when a secondary containment isolation valve is inoperable and not restored to OPERABLE status. However, this action does not include a provision that isolated valves closed to satisfy the requirements may be reopened on an intermittent basis under administrative controls. ITS 3.6.4.2 ACTIONS Note 1 allows any secondary containment penetration flow path, isolated due to an inoperable SCIV, to be unisolated intermittently under administrative controls. This changes the CTS by allowing the secondary containment penetrations to be opened under administrative controls when the associated penetration has been closed to satisfy the actions.	3.6.4.2 ACTIONS Note 1	None	4
3.6.4.2 L.3	CTS 3.7.C.3 allows 8 hours to either restore or isolate an inoperable secondary containment isolation damper (reactor building automatic isolation dampers) if one damper associated with a penetration flow path is inoperable. If two dampers in a penetration are inoperable, CTS 3.7.C.4 must be entered immediately and an orderly shutdown is required. In addition, if a manual valve or blind flange is inoperable, CTS 3.7.C.4 must be entered immediately since CTS 3.7.C.3 only applies to the reactor building automatic dampers. ITS 3.6.4.2 ACTION A covers the condition of one or more penetration flow paths with one SCIV inoperable and it allows 8 hours to isolate the penetration flow path. However, it applies to all types of SCIVs, both automatic and manual. ITS 3.6.4.2 ACTION B covers the condition of one or more penetration flow paths with two SCIVs inoperable and it requires isolation of the penetration flow path within 4 hours. This changes the CTS by providing an 8 hour Completion Time for an inoperable non-automatic SCIV in a penetration flow path with one inoperable SCIV prior to requiring a unit shutdown, and a 4 hour Completion Time if a penetration includes two SCIVs and both are inoperable prior to requiring a unit shutdown.	3.6.4.2 ACTIONS A and B	3.7.C.3, 3.7.C.4	3
3.6.4.2 L.4	CTS 3.7.C.3 states that with an inoperable secondary containment isolation damper inoperable, isolate the affected duct by use of a closed damper or blind flange. ITS 3.6.4.2 Required Action A.1 requires that with one or more penetration flow paths with one SCIV inoperable, the affected penetration flow path be isolated by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange. This changes the CTS by allowing a manual valve as the means of isolating the penetration flow path. The change that requires de-activating the damper is discussed in DOC A.7.	3.6.4.2 Required Action A.1	3.7.C.3	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6.4.2 L.5	CTS 4.7.C.1.b.(2) requires verification that each automatic damper actuates to its isolation position "After maintenance, repair or replacement work is performed on the damper or its associated actuator, control circuit, or power circuit." ITS SR 3.6.4.2.3 requires a similar test; however, this specific Frequency is not required. This changes the CTS by deleting this post-maintenance Surveillance.	SR 3.6.4.2.3	4.7.C.1.b.(2)	5
3.6.4.3 L.1	CTS 3.7.B.1.b requires the unit to be in Cold Shutdown (MODE 4) if two SGT subsystems are inoperable with reactor water temperature $\geq 212^{\circ}\text{F}$. ITS 3.6.4.3 ACTION D requires the unit to enter LCO 3.0.3 under the same conditions. This will require the unit to initiate action within 1 hour to place the unit in MODE 2 within 7 hours, MODE 3 within 13 hours, and MODE 4 within 37 hours. This changes the CTS by requiring the unit to enter LCO 3.0.3 instead of requiring a unit shutdown to MODE 4 within 36 hours, which effectively extends the time the unit is required to be in MODE 4 by 1 hour; however, it also requires the unit to be at the specified intermediate conditions sooner.	3.6.4.3 ACTION D	3.7.B.1.b	3
3.6.4.3 L.2	CTS 3.7.B.2.c requires verification of the automatic actuation of the SGT subsystem upon a receipt of the specified inputs (i.e., test signal). ITS SR 3.6.4.3.3 specifies that the signal may be from either an "actual" or simulated (i.e., test) signal. This changes the CTS by explicitly allowing the use of an actual signal for the test.	SR 3.6.4.3.3	3.7.B.2.c	6
3.6.4.3 L.3	CTS 3.7.B.1 requires the SGT System to be OPERABLE whenever the secondary containment integrity is required, and CTS 3.7.C.2.c requires the secondary containment to be OPERABLE when the fuel cask is being moved within the reactor building. CTS 3.7.B.1.c.1)(b), CTS 3.7.B.1.c.2)(a), and CTS 3.7.B.1.d provide actions when this is not met. ITS 3.6.4.3 does not include this requirement. This changes the CTS by deleting the requirement to maintain the SGT System OPERABLE when the fuel cask is being moved within the reactor building.	None	3.8.B.1, 3.7.B.1.c.1)(b), 3.7.B.1.c.2)(a), 3.7.B.1.d	1
3.7.1 L.1	When two RHRSW subsystems are inoperable, a unit shutdown is required by CTS 3.5.C.3; no time is provided to restore a subsystem prior to requiring the unit shutdown. With two RHRSW subsystems inoperable, ITS 3.7.1 ACTION B will allow 8 hours to restore one inoperable RHRSW subsystem prior to requiring a unit shutdown. This changes the CTS by allowing 8 hours to restore one of two inoperable RHRSW subsystems prior to requiring a unit shutdown.	3.7.1 ACTION B	3.5.C.3	4
3.7.1 L.2	CTS 3.5.C.3 requires the unit to be shutdown and reactor water temperature reduced to less than 212°F within 24 hours if the requirements of CTS 3.5.C.1 or CTS 3.5.C.2 are not met. ITS 3.7.1 ACTION C requires the reactor be in MODE 3 in 12 hours and in MODE 4 in 36 hours. This changes the CTS by requiring the unit to be in MODE 3 in 12 hours and by extending the time to reduce reactor water temperature to $< 212^{\circ}\text{F}$ (i.e., MODE 4) from 24 hours to 36 hours.	3.7.1 ACTION C	3.5.C.3	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7.4 L.1	CTS 3.17.B.1 requires two CREF subsystems to be OPERABLE, but does not allow the main control room boundary to be opened intermittently under administrative controls. If it is opened, both CREF subsystems are inoperable. ITS LCO 3.7.4 also requires the two CREF subsystems to be OPERABLE; however, a Note to the LCO is included that allows the main control room boundary to be opened intermittently under administrative controls. This changes the CTS by allowing the main control room boundary to be opened intermittently under administrative controls without considering the CREF System to be inoperable.	LCO 3.7.4 Note	3.17.B.1	1
3.7.4 L.2	CTS 4.17.B.1 requires that each CREF subsystem be initiated with 1000 cfm ($\pm 10\%$) of flow and operated for 10 hours. ITS SR 3.7.4.1 includes a similar requirement, except the flow rate is not specified. This changes the CTS by deleting the flow rate requirement from the Surveillance acceptance criteria.	SR 3.7.4.1	4.17.B.1	6
3.7.4 L.3	CTS 3.17.B.2.c.(3) and 4.17.B.2.c.(3) require verification of the automatic actuation of each CREF subsystem upon a receipt of the specified inputs (i.e., simulated signal). ITS SR 3.7.4.3 specifies that the signal may be from either an "actual" or "simulated" initiation signal. This changes the CTS by explicitly allowing the use of an actual signal for the test.	SR 3.7.4.3	3.17.B.2.c.(3), 4.17.B.2.c.(3)	6
3.7.4 L.4	CTS 4.17.B.2.c.(3) requires each CREF subsystem to be operating in the pressurization mode of operation while maintaining the control room at a positive pressure with respect to adjacent areas, at least once per operating cycle. ITS SR 3.7.4.4 requires this same test; however, it is required to be performed every 24 months "on a STAGGERED TEST BASIS." This changes the CTS by requiring the test to be performed using each CREF subsystem at least once per 48 months.	SR 3.7.4.4	4.17.B.2.c.(3)	7
3.7.4 L.5	CTS 4.17.B.2.c.(3) requires each CREF subsystem to be operating in the pressurization mode of operation while maintaining the control room at a positive pressure with respect to adjacent areas with a flow rate of 1000 cfm ($\pm 10\%$). ITS SR 3.7.4.4 requires this same test; however, the flow rate limit is specified to be ≤ 1100 cfm. This changes the CTS by deleting the minimum flow rate limit.	SR 3.7.4.4	4.17.B.2.c.(3)	6
3.7.5 L.1	CTS 4.17.A.1 requires verification that the control room temperature is within limit. ITS 3.7.5 does not include this requirement. This changes the CTS by eliminating the Surveillance Requirement to verify control room temperature.	None	4.17.A.1	5
3.7.8 L.1	CTS 4.10.C.1 requires a verification every 24 hours that the spent fuel storage pool water level is within the limit. ITS SR 3.7.8.1 requires verifying the spent fuel storage pool water level is within the limit every 7 days. This changes the CTS by extending the Surveillance Frequency from 24 hours to 7 days.	SR 3.7.8.1	4.10.C.1	7
3.8.1 L.1	CTS 3.9.B requires a plant shutdown when two required offsite circuits are inoperable. ITS 3.8.1 ACTION C covers the condition of two required offsite circuits inoperable and requires the restoration of one required offsite circuit to OPERABLE status within 24 hours. This changes the CTS by providing some	3.8.1 ACTION C	3.9.B	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	time to restore inoperable AC Sources prior to requiring a plant shutdown when two required offsite circuits are inoperable.			
3.8.1 L.2	CTS 3.9.B.2 allows 72 hours to restore an inoperable AC source. However, this 72 hour restoration time is only allowed if transformer 1R or 2R is OPERABLE. ITS 3.8.1 ACTION A allows the 72 hour restoration time regardless of which transformer is OPERABLE (i.e., transformer 1AR may be the only OPERABLE transformer). This changes the CTS by allowing a 72 hour Completion Time for an inoperable required offsite circuit regardless of which transformer remains OPERABLE.	3.8.1 ACTION A	3.9.B.2	4
3.8.1 L.3	When an EDG is found to be inoperable, CTS 3.9.B.3.a.1) requires a demonstration that the remaining EDG is OPERABLE within 24 hours. CTS 3.9.B.3.a.1) also states that the test is required to be completed regardless of when the inoperable EDG is restored to OPERABILITY. CTS 3.9.B.3.a.1) further states that the OPERABILITY of the other EDG need not be demonstrated if the EDG inoperability was due to preplanned preventative maintenance or testing. ITS 3.8.1 Required Action B.3.2 includes a requirement to perform SR 3.8.1.2, which requires the verification that the EDG starts from standby conditions and achieves steady state voltage and frequency. In addition, ITS 3.8.1 Required Action B.3.1 has been added and provides the option to determine OPERABLE EDG(s) are not inoperable due to a common cause failure. This changes the CTS by providing an allowance to not start an OPERABLE EDG as long as it can be shown that there is no common mode failure for any reason, not just due to preplanned preventative maintenance or testing, and deletes the requirement to perform the OPERABILITY demonstration within 24 hours even if the other EDG is restored to OPERABLE status.	3.8.1 Required Actions B.3.1 and B.3.2	3.9.B.3.a.1)	4
3.8.1 L.4	CTS 3.9.B.3.a.2) requires the plant to be placed in cold shutdown when both EDGs are inoperable. ITS 3.8.1 ACTION E covers the condition when two EDGs are inoperable and allows 2 hours to restore one EDG to OPERABLE status prior to requiring a plant shutdown per ITS 3.8.1 ACTION F. This changes the CTS by providing 2 hours to restore one EDG to OPERABLE status when it is discovered that both EDG subsystems are inoperable prior to requiring a unit shutdown.	3.8.1 ACTION E	3.9.B.3.a.2)	3
3.8.1 L.5	CTS 1.0.L allows a system, subsystem, train, component, or device to be considered OPERABLE with an inoperable emergency or normal power source, provided its corresponding normal or emergency power source is OPERABLE and its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE. CTS 1.0.L requires the equipment to be declared inoperable immediately when these requirements are not met. ITS 3.8.1 Required Action A.2 (which applies when one required offsite source is inoperable) requires the declaration of required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable. The Completion Time for ITS 3.8.1 Required Action A.2 is 24 hours from discovery of no offsite power to one division, concurrent with inoperability of redundant required feature(s). ITS 3.8.1	3.8.1 Required Actions A.2, B.2, and C.1	1.0.L	3

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>Required Action B.2 (which applies when one required EDG is inoperable) requires the declaration of required feature(s), supported by the inoperable EDG, as inoperable when the required redundant feature(s) are inoperable. The Completion Time allowed for ITS 3.8.1 Required Action B.2 is 4 hours from discovery of Condition B, concurrent with inoperability of redundant required feature(s). ITS 3.8.1 Required Action C.1 (which applies when two required offsite circuits are inoperable) requires the declaration of required feature(s) as inoperable when the redundant required feature(s) are inoperable. The Completion Time for ITS 3.8.1 Required Action C.1 is 12 hours from discovery of Condition C, concurrent with inoperability of redundant required feature(s). This changes the CTS by allowing more time to restore inoperable equipment.</p>			
<p>3.8.1 L.6</p>	<p>CTS 4.9.B.3.a.1) requires, in part, a verification that each EDG is capable of operating at "approximately rated load" for at least 60 minutes. ITS SR 3.8.1.3 requires the same verification; however, the test is allowed to be performed at a load of 2250 kW to 2500 kW, which corresponds to 90% and 100% of rated load. In addition, Note 2 to SR 3.8.1.3 states that momentary transients outside the load range do not invalidate this test. This changes the CTS by allowing the EDGs to be tested at a slightly lower load during this Surveillance.</p>	<p>SR 3.8.1.3 including Note 2</p>	<p>4.9.B.3.a.1)</p>	<p>6</p>
<p>3.8.1 L.7</p>	<p>CTS 4.9.B.3.a.2) contains a requirement to simulate a loss of offsite power in conjunction with an ECCS actuation test signal "during shutdown." ITS SR 3.8.1.12 requires a similar test, and includes a Note (Note 2) that states the Surveillance shall not normally be performed in MODE 1, 2, or 3. The Note also states that portions of the Surveillance may be performed to reestablish OPERABILITY, provided an assessment determines the safety of the plant is maintained or enhanced. It further states that credit may be taken for unplanned events that satisfy this SR. This changes the CTS by allowing the Surveillances to be performed in the operating MODES, provided the Surveillance is performed to reestablish OPERABILITY and an assessment is performed to determine plant safety is maintained or enhanced, or provided that it is an unplanned event that satisfies the requirements of the SR.</p>	<p>SR 3.8.1.12 Note 2</p>	<p>4.9.B.3.a.2)</p>	<p>9</p>
<p>3.8.1 L.8</p>	<p>CTS 4.9.B.3.a.2) requires verification of EDG performance following a "simulated" loss of offsite power in conjunction with an ECCS actuation "test" signal. ITS SR 3.8.1.12 performs a similar test, but specifies that each signal may be from either an "actual" or "simulated" (i.e., test) signal. This changes the CTS by explicitly allowing the use of an actual signal for the test.</p>	<p>SR 3.8.1.12</p>	<p>4.9.B.3.a.2)</p>	<p>6</p>
<p>3.8.1 L.9</p>	<p>CTS 4.9.B.3.b.2) requires the diesel fuel oil transfer system to be tested "during the monthly generator test." ITS SR 3.8.1.5, which requires the same Surveillance to be performed once per 31 days, does not include the requirement that it be performed "during the monthly generator test." This changes the CTS by deleting the requirement to test the diesel fuel oil transfer system during the monthly generator test, and allowing it to be tested any time during the 31 day period.</p>	<p>SR 3.8.1.5</p>	<p>4.9.B.3.a.2)</p>	<p>7</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8.2 L.1	<p>CTS 3/4.9 does not contain any specific OPERABILITY requirements for the qualified offsite circuits and EDGs during shutdown conditions. However, the CTS 1.0.W definition of OPERABLE requires that, for all equipment required to be OPERABLE, "all necessary attendant ... normal and emergency electrical power sources... that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)." Furthermore, the definition states that if the normal or emergency power source is inoperable, the system, subsystem, train, component or device may be considered OPERABLE, provided the corresponding normal or emergency power source is OPERABLE and all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE. New requirements were added as ITS LCO 3.8.2.a and LCO 3.8.2.b. ITS LCO 3.8.2.a requires one qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems - Shutdown," and ITS LCO 3.8.2.b requires one EDG capable of supplying one division of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8. ITS 3.8.2 is required in MODES 4 and 5 and during the movement of irradiated fuel assemblies in the secondary containment. This changes the CTS by adding an explicit LCO for an offsite circuit and emergency source during shutdown conditions (i.e., MODES 4 and 5 and during the movement of irradiated fuel assemblies in the secondary containment).</p>	LCO 3.8.2	1.0.W	1
3.8.3 L.1	<p>The CTS 3.9.B.3.b does not provide explicit compensatory actions if the volume of fuel oil in the storage tank is less than the specified limit. Thus, if the minimum indicated volume is not met, both EDGs must be declared inoperable and CTS 3.9.B.3.a.2), which requires a plant shutdown, must be entered. ITS 3.8.3 ACTION A allows the unit to not declare the EDGs inoperable, provided the volume of stored fuel oil is greater than that needed to operate a EDG for 6 days at full load (i.e., > 33,600 gallons). In this situation, ITS 3.8.3 Required Action A.1 allows 48 hours to restore the fuel oil volume to within limits. If this Required Action and associated Completion Time is not met or if the EDG fuel oil storage tank volume is ≤ 33,600 gallons, both EDGs must be declared inoperable immediately and appropriate ACTIONS taken per ITS 3.8.1 (ITS 3.8.3 ACTION G). Any changes to the Actions taken after the EDGs are declared inoperable are discussed in the Discussion of Changes in ITS 3.8.1. This changes the CTS by allowing a time period to restore the fuel oil to within limits.</p>	3.8.3 ACTIONS A and G	3.9.B.3.a.2)	4
3.8.4 L.1	<p>When one of the two 125 VDC battery systems or one of the two 250 V battery systems is made or found to be inoperable, CTS 3.9.B.4 requires a plant shutdown; no time is provided to restore the inoperable battery systems. ITS 3.8.4 ACTION A covers the condition for one or more Division 1 or Division 2 required battery chargers inoperable and requires the restoration of battery terminal voltage to greater than or equal to the minimum established float voltage</p>	3.8.4 ACTIONS A and B	3.9.B.4	4

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	within 2 hours, the verification that battery float current is ≤ 2 amps for 250 VDC batteries and ≤ 1 amp for 125 VDC batteries once per 12 hours, and the restoration of the inoperable battery charger(s) to OPERABLE status within 7 days. If one Division 1 or Division 2 DC electrical power subsystem is inoperable for reasons other than those specified in ITS 3.8.4 ACTION A, ITS 3.8.4 ACTION B requires the restoration of the inoperable DC electrical power subsystem within 2 hours. This changes the CTS by providing a restoration time for inoperable Division 1 or Division 2 battery chargers and inoperable Division 1 or Division 2 battery subsystem for reasons other than for inoperable chargers (i.e., an inoperable battery or batteries) prior to requiring a plant shutdown.			
3.8.6 L.1	CTS 3.9.B.4 requires a reactor shutdown if one of the two 125 VDC battery systems or 250 VDC battery systems is inoperable. In addition, when more than one 125 VDC or 250 VDC battery system is inoperable, CTS 3.9.B also requires a reactor shutdown. These Actions are applicable when the battery systems are inoperable due to battery parameters not within limits. In lieu of requiring an reactor shutdown under these conditions, the ITS 3.8.6 ACTIONS provide compensatory actions, when battery parameters are not within limits, to be taken prior to declaring the associated battery inoperable. This changes the CTS by adding compensatory actions for battery parameters not within limits.	3.8.6 ACTIONS Note, 3.8.6 ACTIONS A, B, C, D, E, and F	3.9.B, 3.9.B.4	4
3.8.6 L.2	CTS 4.9.B.4.a requires the verification that the pilot cell voltage and temperature of the adjacent cells are within limits. ITS SR 3.8.6.2 requires verification of battery pilot cell voltage every 31 days, while ITS SR 3.8.6.4 requires verification of the battery pilot cell temperature every 31 days. This changes the CTS by extending the Surveillance interval for verification of pilot cell voltage and temperature from 7 days to 31 days. The change to measure the battery pilot cell temperature instead of the adjacent cells to the pilot cells is discussed in DOC L.4.	SR 3.8.6.2, SR 3.8.6.4	4.9.B.4.a	7
3.8.6 L.3	CTS 4.9.B.4.a requires verification of pilot cell specific gravity every week and CTS 4.9.B.4.b requires verification of each cell specific gravity every 3 months. ITS 3.8.6 does not include these Surveillances. This changes the CTS by deleting these Surveillances.	None	4.9.B.4.a, 4.9.B.4.b	5
3.8.6 L.4	CTS 4.9.B.4.a requires verification of electrolyte temperature of all cells adjacent to the pilot cells. ITS SR 3.8.6.4 requires verification of each pilot cell temperature. This changes the CTS by reducing the number of cells that must be monitored for electrolyte temperature.	SR 3.8.6.4	4.9.B.4.a	6
3.8.6 L.5	CTS 4.9.B.4.b requires verification of the temperature of every fifth cell every 3 months. ITS 3.8.6 does not include this Surveillance. This changes the CTS by deleting this Surveillance.	None	4.9.B.4.b	5
3.8.6 L.6	CTS 4.9.B.4.c requires the "rated load discharge test" (i.e., a "performance discharge test" in the ITS) to be performed every refueling interval. ITS SR 3.8.6.6 is performed every 60 months, every 12 months when the battery shows degradation or has reached 85% if the expected life with capacity < 100% of	SR 3.8.6.6	4.9.B.4.c	7

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>manufacturer's rating, and every 24 months when the battery has reached 85% of the expected life with capacity > 100% of manufacturer's rating. This changes the CTS by extending the Frequency from every refueling interval to 60 months, provided the battery has not reached 85% of expected life. If the battery has reached 85% of expected life, then the Frequency is maintained at the current 24 months (the term "refueling interval" is changed to "24 months"), provided the battery capacity is \geq 100% of the manufacturer's rating. The CTS is also changed by adding an accelerated Frequency of 12 months if the battery has reached 85% of expected life and the capacity is < 100% of manufacturer's rating.</p>			
<p>3.8.6 L.7</p>	<p>CTS 4.9.B.4.c requires the performance of a "rated load discharge" test of the Division 1 and Division 2 250 VDC and 125 VDC batteries. ITS SR 3.8.6.6 requires the performance of a "performance discharge" test or a "modified performance discharge" test. This changes the CTS by adding the allowance to perform a modified performance discharge test instead of the performance discharge test (equivalent to the rated load discharge test).</p>	<p>SR 3.8.6.6</p>	<p>4.9.B.4.c</p>	<p>6</p>
<p>3.8.6 L.8</p>	<p>CTS 4.9.B.4.c requires the performance of a rated load discharge test of the Division 1 and Division 2 250 VDC and 125 VDC batteries. At the completion of this test, the CTS requires the determination of specific gravity and voltage of each cell. ITS SR 3.8.6.6 does not require this verification. This changes the CTS by deleting the requirement to determine specific gravity and voltage at the completion of the test.</p>	<p>None</p>	<p>4.9.B.4.c</p>	<p>6</p>
<p>3.8.7 L.1</p>	<p>CTS 3.9.B.4 requires a plant shutdown when one of the two 125V battery systems or one of the two 250V battery systems is made or found to be inoperable for any reason. CTS 3.9.B requires a plant shutdown when any AC electrical power distribution subsystem or more than one 125 V or 250 V DC battery system is inoperable. ITS 3.8.7 ACTION A covers the condition for one or more AC electrical power distribution subsystems inoperable, and requires the restoration of the AC electrical power distribution subsystem(s) to OPERABLE status within 8 hours. A Note to the ACTION also requires entry into LCO 3.8.4, "DC Source - Operating," for DC divisions made inoperable by the inoperable AC power distribution subsystems. ITS 3.8.7 ACTION B covers the condition for one or more DC electrical power distribution subsystems inoperable, and requires the restoration of the DC electrical power distribution subsystem(s) to OPERABLE status within 2 hours. This changes the CTS by providing some time to restore inoperable AC or DC electrical power distribution subsystems prior to requiring a plant shutdown, provided a loss of function has not occurred.</p>	<p>3.8.7 ACTIONS A (including Note) and B</p>	<p>3.9.B, 3.9.B.4</p>	<p>4</p>
<p>3.9.1 L.1</p>	<p>CTS 3.10.A requires the reactor mode switch to be in the refuel position during "core alterations" and the refueling interlocks to be OPERABLE. ITS LCO 3.9.1 requires the refueling equipment interlocks associated with the reactor mode switch refuel position to be OPERABLE during "in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position." This changes the CTS by requiring the refuel equipment</p>	<p>3.9.1 Applicability</p>	<p>3.10.A</p>	<p>2</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	interlocks to be OPERABLE only during certain CORE ALTERATIONS (i.e., during in-vessel fuel movement).			
3.9.1 L.2	CTS 3.10.A requires the reactor mode switch to be "locked" in the refuel position. ITS 3.9.1 is applicable when the reactor mode switch is in the refuel position. This changes the CTS by deleting the requirement to lock the reactor mode switch when in the refuel position.	3.9.1 Applicability	3.10.A	1
3.9.1 L.3	CTS 3.10.A does not provide specific Actions for when the refueling equipment interlocks are inoperable. However, since the refueling interlocks must be OPERABLE during CORE ALTERATIONS, this implies that CORE ALTERATIONS must be suspended if the refueling interlocks are inoperable. ITS 3.9.1 ACTION A covers the condition when one or more required refueling equipment interlocks are inoperable and requires either the immediate suspension of in-vessel fuel movement with equipment associated with the inoperable interlock(s) or the insertion of a control rod withdrawal block and a verification that all control rods are fully inserted. This changes the CTS by providing specific Actions for when a refueling equipment interlock is not met.	3.9.1 ACTION A	3.10.A	4
3.9.1 L.4	CTS 4.10.A requires the refueling interlocks (in this case the refueling equipment interlocks) to be functionally tested "following any repair work associated with the interlocks." ITS SR 3.9.1.1 does not require this verification "following any repair work associated with the interlocks." This changes the CTS by eliminating the requirement to functionally test the refueling equipment interlocks "following any repair work associated with the interlocks."	None	4.10.A	5
3.9.2 L.1	CTS 3.10.A requires the reactor mode switch to be in the refuel position during "core alterations" and the refueling interlocks to be OPERABLE. ITS LCO 3.9.2 requires the refuel position one-rod-out interlock to be OPERABLE in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn. This changes the CTS by requiring the refuel position one-rod-out interlock to be OPERABLE only during certain CORE ALTERATIONS (in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn).	3.9.2 Applicability	3.10.A	2
3.9.2 L.2	CTS 4.10.A requires the refueling interlocks (in this case the refuel position one-rod-out interlock) to be functionally tested every 7 days. ITS SR 3.9.2.2 includes a Note that states the Surveillance is not required to be performed until 1 hour after any control rod is withdrawn. This changes the CTS by allowing the test to be delayed up to 1 hour after any control rod is withdrawn.	SR 3.9.2.2	4.10.A	7
3.9.2 L.3	CTS 4.10.A requires the refueling interlocks (in this case the refuel one-rod-out interlock) to be functionally tested "following any repair work associated with the interlocks." ITS SR 3.9.2.2 does not require this verification "following any repair work associated with the interlocks." This changes the CTS by eliminating the requirement to functionally test the refueling equipment interlocks "following any repair work associated with the interlocks."	None	4.10.A	5

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9.5 L.1	CTS 4.3.D requires a check of the status in the control room of the required OPERABLE accumulator every 12 hours. ITS SR 3.9.5.2 requires a similar verification that the pressure in each accumulator is \geq 940 psig every 7 days. This changes the CTS extending the Surveillance Frequency from once every 12 hours to every 7 days.	SR 3.9.5.2	4.3.D	7
3.9.5 L.2	CTS 4.3.D requires, in part, a check of the status in the control room of the required OPERABLE accumulator level alarm. The ITS does not include this requirement. This changes the CTS by deleting the requirement to verify the alarm for accumulator level in the control room.	None	4.3.D	6
3.10.1 L.1	Various current Technical Specifications provide requirements for components to be OPERABLE when the reactor coolant temperature is $>$ 212°F. For example, CTS 3.5.A.1 requires the Core Spray and LPCI subsystems to be OPERABLE whenever irradiated fuel is in the reactor vessel and the reactor water temperature is $>$ 212°F. The above conditions could be met during an inservice leak or hydrostatic test. ITS LCO 3.10.1 states that the average reactor coolant temperature specified in Table 1.1-1 for MODE 4 may be changed to "NA," and operation considered not to be in MODE 3; and that the requirements of LCO 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System - Cold Shutdown," may be suspended to allow performance of an inservice leak or hydrostatic test, provided the specific activity of the reactor coolant is \leq 0.02 μ Ci/gm DOSE EQUIVALENT I-131 and the following MODE 3 LCOs are met: LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation" Functions 1, 3, and 4 of Table 3.3.6.2-1; LCO 3.6.4.1, "Secondary Containment;" LCO 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs);" and LCO 3.6.4.3, "Standby Gas Treatment (SGT) System." In addition, ITS SR 3.10.1.1 requires the performance of the applicable SRs for the required MODE 3 LCOs. In addition, appropriate ACTIONS have been included in the ITS. ITS 3.10.1 ACTION A covers the condition for one or more of the ITS LCO 3.10.1 requirements not met. ITS 3.10.1 Required Action A.1 requires immediate entry into the applicable Condition of the affected LCO. Furthermore, this Required Action is modified by a Note that states "Required Actions to be in MODE 4 include reducing average reactor coolant temperature to \leq 212°F." In lieu of performing ITS 3.10.1 Required Action A.1, ITS 3.10.1 Required Action A.2.1 requires an immediate suspension of activities that could increase the average reactor coolant temperature or pressure, and ITS 3.10.1 Required Action A.2.2 requires the average reactor coolant temperature to be reduced to \leq 212°F within 24 hours. ITS 3.10.1 ACTIONS include a Note that states "Separate Condition entry is allowed for each requirement of the LCO." This changes the CTS by not requiring many LCOs required to be met in MODE 3 to be met during an inservice leak or hydrostatic test performed with reactor coolant temperature $>$ 212°F, provided certain requirements are met, and providing a specific ACTION and Surveillance Requirement.	LCO 3.10.1 ACTION A, SR 3.10.1.1	Various CTS requirements	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.10.2 L.1	<p>CTS 3.10.E applies during extended core and control rod drive maintenance. It allows more than one control rod to be withdrawn from the core during outages, provided that, except for momentary switching to the startup mode for interlock testing, the reactor mode switch shall be locked in the refuel position. The CTS does not allow reactor mode switch interlock testing during MODES 3 and 4, nor does it allow placing the mode switch in the run position during MODE 5. ITS LCO</p> <p>3.10.2 allows the reactor mode switch position specified in Table 1.1-1 for MODES 3, 4, and 5 to be changed to include run, startup/hot standby, and refuel position, and operation considered not to be in MODE 1 or 2, to allow testing of instrumentation associated with the reactor mode switch interlock functions, provided the conditions specified in ITS LCO 3.10.2.a and b are met. ITS LCO 3.10.2.a requires all control rods to remain fully inserted in core cells containing one or more fuel assemblies and ITS LCO 3.10.2.b requires no CORE ALTERATIONS to be in progress. An ACTION has been provided (ITS 3.10.2 ACTION A) if these two conditions are not met. The ACTION requires the conditions to be met or to exit the LCO's Applicability (i.e., place the reactor mode switch in shutdown or refuel, as appropriate for the current MODE). Furthermore, two Surveillance Requirements have been added (ITS SR 3.10.2.1 and SR 3.10.2.2) to ensure these conditions are periodically met when using the allowances of this LCO. This changes the CTS by: a) allowing reactor mode switch testing to occur in MODES 3 and 4 with the reactor mode switch in the run, startup/hot standby, or refuel position; b) allowing reactor mode switch testing during MODE 5 operations to include the run position; c) providing appropriate actions if the LCO requirements are not met; and d) providing appropriate Surveillances to periodically ensure the LCO requirements are met.</p>	LCO 3.10.2, 3.10.2 ACTION A, SR 3.10.2.1, SR 3.10.2.2	3.10.E	1
3.10.3 L.1	<p>The CTS does not allow the reactor mode switch to be placed in the refuel position to allow withdrawal of a single control rod when the unit is in Hot Shutdown (MODE 3). ITS 3.10.3 allows the reactor mode switch position in ITS Table 1.1-1 for MODE 3 to be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, provided specific requirements are met. In addition, an ACTION (ITS 3.10.3 ACTION A) has been added to cover the condition when one or more of the requirements of LCO 3.10.3 are not met. As stated in the ACTIONS Note, ACTION A is allowed to be entered separately for each requirement of the LCO not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the withdrawal of a single control rod in MODE 3 by placing the reactor mode switch in the refuel position, and operation not to be considered in MODE 2, provided certain requirements are met.</p>	3.10.3	None	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.10.4 L.1	The CTS does not allow the reactor mode switch to be placed in the refuel position to allow withdrawal of a single control rod when the unit is in Cold Shutdown (MODE 4). ITS 3.10.4 allows the reactor mode switch position in ITS Table 1.1-1 for MODE 4 to be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, and subsequent removal of the associated control rod drive if desired, provided specific requirements are met. In addition, ACTIONS (ITS 3.10.4 ACTIONS A and B) have been added to cover the condition when one or more of the requirements of LCO 3.10.4 are not met. As stated in the ACTIONS Note, ACTIONS A and B are allowed to be entered separately for each requirement of the LCO not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the withdrawal of a single control rod and subsequent removal of the CRD in MODE 4, by placing the reactor mode switch in the refuel position, and operation not to be considered in MODE 2, provided certain requirements are met.	3.10.4	None	1
3.10.5 L.1	CTS 3.3.B.1 allows a control rod to be uncoupled from its drive for inspection as long as the reactor is in the refueling mode. ITS 3.10.5 allows the requirements of LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation;" LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring;" LCO 3.9.1, "Refueling Equipment Interlocks," LCO 3.9.2, "Refuel Position One Rod Out Interlock;" LCO 3.9.4, "Control Rod Position Indication;" and LCO 3.9.5, "Control Rod OPERABILITY - Refueling," to be suspended in MODE 5 to allow the removal of a single CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies, provided certain specific requirements are met. In addition, an ACTION (ITS 3.10.5 ACTION A) has been added to cover the condition when one or more of the requirements of LCO 3.10.5 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the removal of a single control rod with certain LCOs not met.	3.10.5	3.3.B.1	1
3.10.6 L.1	CTS 3.10.E requires the reactor mode switch to be "locked" in the "Refuel" position during extended core and control rod drive maintenance. ITS 3.10.6 requires the unit to be in MODE 5, which is defined in ITS Table 1.1-1 as having the reactor mode switch in the shutdown or refuel position with one or more reactor vessel head closure bolts less than fully tensioned. This changes the CTS by deleting the requirement to "lock" the reactor mode switch in the "Refuel" position and also allowing the reactor mode switch to be placed in the "Shutdown" position.	None	3.10.E	1
3.10.7 L.1	The CTS does not provide any specific requirements for control rod testing during MODES 1 and 2. ITS LCO 3.10.7 allows the requirements of LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM demonstrations, control rod scram time testing, and control rod friction testing, provided the bank	3.10.7	None	1

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	<p>position withdrawal sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or provided the RWM is bypassed, the requirements of LCO 3.3.2.1, "Control Rod Block Instrumentation," Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or other qualified member of the technical staff. In addition, an ACTION (ITS 3.10.7 ACTION A) has been added to cover the condition when requirements of LCO 3.10.7 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing the Rod Pattern Control Specification to be suspended during the specified testing.</p>			
<p>3.10.8 L.1</p>	<p>The CTS does not provide any specific requirements for performing a SDM test in MODE 5. ITS LCO 3.10.8 allows the reactor mode switch position specified in Table 1.1-1 for MODE 5 to be changed to include the startup/hot standby position, and operation considered not to be in MODE 2, to allow SDM testing, provided certain requirements are met. In addition, ACTIONS (ITS 3.10.8 ACTIONS A and B) have been added to cover the condition when one or more of the requirements of LCO 3.10.8 are not met. Furthermore, Surveillance Requirements have been added to help ensure the requirements of the LCO are met. This changes the CTS by allowing SDM testing to be performed in MODE 5, by placing the reactor mode switch in startup/hot standby position, and operation not to be considered in MODE 2, provided certain requirements are met.</p>	<p>3.10.8</p>	<p>None</p>	<p>1</p>
<p>4</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>
<p>5.2 L.1</p>	<p>CTS 6.1.C.4 requires an individual qualified in radiation protection procedures to be onsite when fuel is in the reactor. ITS 5.2.2.c includes the same requirement, but allows the position to be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is take to fill the required position. This changes the CTS by allowing the radiation protection technician position to be vacant for a short time due to unexpected circumstances.</p>	<p>5.2.2.c</p>	<p>6.1.C.4</p>	<p>1</p>
<p>5.2 L.2</p>	<p>CTS 6.1.F provides specific details concerning working hour limits for unit staff who perform safety related functions. These details include the normal working hours in a week, the number of hours allowed to work in a continuous period, the number of hours allowed to work in a 24 hour and 48 hour period, the number of hours for a work period break, and that overtime should be evaluated on an individual basis, not an entire staff basis, except during an extended shutdown. ITS 5.2.2.d requires procedures to be developed and implemented to limit the number of working hours for personnel who perform safety related functions, but does not include these specific details. This changes the CTS by deleting these working hour-related details.</p>	<p>5.2.2.d</p>	<p>6.1.F</p>	<p>1</p>
<p>5.5 L.1</p>	<p>CTS 4.7.B.2.a, in part, requires the performance of an in-place DOP test of the SGT System HEPA filter banks, an in-place test of the SGT charcoal adsorber</p>	<p>None</p>	<p>4.7.B.2.a</p>	<p>7</p>

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
	banks, and a laboratory analysis of a carbon test sample from the SGT charcoal adsorber at least once per 720 hours of system operation. ITS 5.5.6 does not require the in-place DOP test of the HEPA filter banks or an in-place test of the charcoal adsorber bank at least once per 720 hours of system operation. This changes the CTS by deleting the test requirements to perform an in-place DOP test of the HEPA filter banks and an in-place test of the charcoal adsorber banks every 720 hours of system operation.			
5.5 L.2	CTS 4.9.B.3.b.3) requires a sample and check for quality of the diesel fuel every month. Currently, this is met by performing a viscosity check and a water and sediment check. ITS 5.5.8.c only requires total particulate concentration of the fuel oil to be tested every 31 days. This changes the CTS by deleting the monthly viscosity and water and sediment checks of stored fuel oil.	5.5.8.c	4.9.B.3.b.3)	7
5.5 L.3	CTS 4.17.B.2.a.(4) requires the CREF System to be initiated "from the control room" with a flow of 1000 cfm (\pm 10%). ITS SR 5.5.6.a and 5.5.6.b do not specify how to initiate the system. This changes the CTS by deleting the requirement to start the system from the control room.	5.5.6.a, 5.5.6.b	4.17.B.2.a.(4)	6
5.5 L.4 BSI 7	<p style="text-align: center;">*** THIS ITEM IS A BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>CTS 6.8.B includes the Primary Coolant Sources Outside Containment program requirements. The Combustible Gas Control System is included in this program. ITS 5.5.2 includes the same program requirements for the Primary Coolant Sources Outside Containment Program, except the Combustible Gas Control System is not included in the program. This changes the CTS by deleting the program requirement for the Combustible Gas Control System in the Primary Coolant Sources Outside Containment Program.</p>	5.5.2	6.8.B	Note 4
5.5 L.5 BSI 8	<p style="text-align: center;">*** THIS ITEM IS A BSI ***</p> <p style="text-align: center;">*** Please see separate safety review and safety evaluation ***</p> <p>CTS 6.8.B.2 specifies that the integrated leak test requirements for each system outside containment that could contain highly radioactive fluids during a serious transient or accident must be performed at a refueling cycle interval or less. CTS 6.8.B also states that CTS 4.0.B is applicable (i.e., a 25% grace period is allowed). ITS 5.5.2.b specifies that the same test must be performed at least once per 24 months and ITS 5.5.2 states that the provisions of ITS SR 3.0.2 are applicable. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., the current Monticello frequency for this test, based on the previous refueling outage interval) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in ITS SR 3.0.2).</p>	5.5.2.b	6.8.B.2	Note 4
5.6	CTS 6.7.A.1 contains requirements for submitting a report of plant startup and power	None	6.7.A.1	8

Table L - Less Restrictive Changes

ITS/CTS No. and DOC No.	Description of Change	ITS Requirement	CTS Requirement	Change Category
L.1	escalation testing following: a) receipt of an operating license; b) amendment to the license involving planned increase in power level; c) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and d) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.7.A.1.			
5.6 L.2	CTS 6.7.C.3 specifies requirements for other Environment Reports (non-radiological, non-aquatic). ITS 5.6 does not include this reporting requirement. This changes the CTS by deleting the requirement of other Environmental Reports (non-radiological, non-aquatic).	None	6.7.C.3	8

Change Categories:

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

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

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

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

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