

Table LA  
Removed Details  
Section 1.0 - Use and Application

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 1.0 CTS 1.0	LA.1	1.9	The CTS CHANNEL CALIBRATION definition contains a requirement that states, "Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION shall include an inplace cross calibration that compares the other sensing elements with the recently installed sensing element". The ISTS CHANNEL CALIBRATION definition does not contain this requirement. However, the ISTS Bases description of the CHANNEL CALIBRATION surveillance does contain this information where appropriate. Therefore, the CTS CHANNEL CALIBRATION definition is being revised to remove this information to the TS Bases consistent with the ISTS.	ITS Bases	ITS 5.5.10	3

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
 Removed Details  
 Section 2.0 - Safety Limits

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
			NONE			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
 Removed Details  
 Section 3.0 - LCO and SR Applicability

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
			<b>NONE</b>			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	LA.1	3.1.1.1 LCO, Actions, & SR	CTS 3.1.1.1 states that the SHUTDOWN MARGIN shall be $\geq 1.77\% \Delta k/k$ . CTS 3.1.1.2 states that the SHUTDOWN MARGIN shall be $\geq 1.0\% \Delta k/k$ . ITS 3.1.1 states that SHUTDOWN MARGIN shall be within the limits provided in the COLR. This changes the CTS by relocating the SHUTDOWN MARGIN parameter limits to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.3	1
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	LA.2	4.1.1.1.1.e	CTS Surveillance 4.1.1.1.1.e requires determination that the SDM is within limit and specifically requires the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.1.1 requires determination that SDM is within limit but does not describe the factors that must be considered in the calculation. This information is contained in the ITS Surveillance Bases. This changes the CTS by removing details on how the SDM calculation is performed from the specifications and placing the information in the Bases.	Bases	ITS 5.5.10	3
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	LA.3	4.1.1.1.2	CTS Surveillance 4.1.1.1.2 requires comparison of the actual and predicted core reactivity balance and specifically requires consideration of at least those factors stated in Specification 4.1.1.1.1.e. ITS SR 3.1.2.1 requires comparison of the actual and predicted core reactivity balance but does not describe the factors that must be considered in the calculation. This information is moved to the Bases for ITS SR 3.1.2.1. This changes the CTS by removing details on how the core reactivity balance comparison calculation is performed from the specification and placing the information in the Bases.	Bases	ITS 5.5.10	3
ITS 3.1.1 & 3.1.2 CTS 3.1.1.1	LA.4	4.1.1.1.1.f	CTS surveillance 4.1.1.1.1.f requires that "The Reactor Coolant System shall be borated to at least the COLD SHUTDOWN boron concentration prior to manually blocking the Low Pressurizer Pressure Safety Injection Signal and shall remain at this boron concentration or greater at all times during which this signal is blocked". The corresponding ISTS does not contain a similar requirement. In order to conform with the ISTS this BVPS requirement is moved into the COLR consistent with the location of the corresponding SDM limits.	COLR	ITS 5.6.3	1

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Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.1.1 CTS 3.1.1.2	LA.1	3.1.1.2	CTS 3.1.1.2 states that the SHUTDOWN MARGIN shall be $\geq 1.0\% \Delta k/k$ . ITS 3.1.1 states that SHUTDOWN MARGIN shall be within the limits provided in the COLR. This changes the CTS by relocating the SHUTDOWN MARGIN parameter limits to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.3	1
ITS 3.1.1 CTS 3.1.1.2	LA.2	4.1.1.2.b	CTS Surveillance 4.1.1.2.b requires determination that the SDM is within limit and specifically require the consideration of the following factors: reactor coolant system boron concentration, control rod position, reactor coolant system average temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration. ITS SR 3.1.1.1 requires determination that SDM is within limit but does not describe the factors that must be considered in the calculation. This information is contained in the ITS Surveillance Bases. This changes the CTS by removing details on how the SDM calculation is performed from the specifications and placing the information in the Bases.	Bases	ITS 5.5.10	3
ITS 3.1.3 CTS 3.1.1.4	LA.1	3.1.1.4	CTS 3.1.1.4 states that the Moderator Temperature Coefficient (MTC) shall be: Less negative than $-5.0 \times 10^{-4} \Delta k/k/^\circ F$ at RATED THERMAL POWER. ITS 3.1.3 states that the MTC shall be maintained within the limits specified in the COLR. This changes the CTS by relocating the lower or end of life MTC limit to the Core Operating Limits Report (COLR). The upper or beginning of life limit remains in the TS.	COLR	ITS 5.6.3	1
ITS 3.1.3 CTS 3.1.1.4	LA.2	4.1.1.4.1	CTS Surveillance 4.1.1.4.1 specifies that "MTC shall be determined to be within its limits by confirmatory measurements. MTC measured values shall be extrapolated and/or compensated to permit direct comparison with the above limits." The corresponding ISTS surveillances for MTC do not contain this level of detailed information regarding how the surveillance requirement is met. This information is contained in the ITS Surveillance Bases. This changes the CTS by removing details on how the MTC is verified from the specifications and placing the information in the Bases.	Bases	ITS 5.5.10	3

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Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.1.8 CTS 3.1.2.9	LA.1	3.1.2.9 LCO	The Unit 1 and Unit 2 CTS 3.1.2.9 state "The following valves shall be locked, sealed, or otherwise secured in the closed position except during planned boron dilution or makeup activities". The Unit 1 CTS lists the following valves: 1CH-90, or 1CH-91 and 1CH-93. The Unit 2 CTS lists the following valves: 2CHS-37 and 2CHS-828, or 2CHS-91, 2CHS-96 and 2CHS-138. The corresponding ISTS does not list the specific valves that must be isolated. The specific valve numbers are moved to the specification Bases.	Bases	ITS 5.5.10	1
ITS 3.1.4 CTS 3.1.3.1	LA.1	3.1.3.1 Action	CTS 3.1.3.1 Action "a" states, " With one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable...". The corresponding ISTS Action Condition states "One or more rods inoperable". The CTS Action is revised to be consistent with the ISTS. This changes the CTS Action by removing the text describing an inoperable rod.	Bases	ITS 5.5.10	3
ITS 3.1.4 CTS 3.1.3.1	LA.2	3.1.3.1 Action	CTS Action c.2 states "The rod is declared inoperable and the remainder of the rods in the group with the inoperable rod are aligned to within $\pm 12$ steps of the inoperable rod while maintaining the rod sequence and insertion limits provided in the CORE OPERATING LIMITS REPORT. The THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation." . The corresponding ISTS Action simply specifies that the rod alignment be restored to within the limit. The CTS Actions are revised to conform to the ISTS. This changes the CTS by eliminating the detailed instructions for restoring compliance with the LCO.	Bases	ITS 5.5.10	3
ITS 3.1.7.2 CTS 3.1.3.2 (Unit 2)	LA.1	3.1.3.2 LCO	The CTS 3.1.3.2 LCO requires that the rod position indication be capable of determining the control rod positions within $\pm 12$ steps. The corresponding ISTS LCO (3.1.7) only specifies that the rod position indication be operable. The ISTS convention is to specify the details of system or component design and operability in the TS Bases document. Consistent with the ISTS the CTS description of operability (system design requirement) is moved to the associated Bases. This changes the CTS by simplifying the LCO requirement consistent with the ISTS.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	LA.1	3.1.3.2	The CTS 3.1.3.2 LCO requirement includes the following system details "Group Demand Counter, 1 per group Individual analog rod position instrument channel, 1 per rod ±12 steps accuracy". The LCO requirement details are modified by footnotes that state; " During the first hour following rod motion, the group demand counter is the primary indicator of precise rod position information, with the analog channels displaying general rod movement information. For power-levels below 50%, a 1-hour thermal soak time is allowed before the analog channels are required to perform within the specified accuracy. The CTS LCO requirements are repeated in the Actions, which also reference the one hour thermal soak time. The corresponding ISTS LCO requirement simply requires that the rod position indicating systems be operable The ISTS Actions do not reference soak times. The CTS LCO and Action requirements are revised consistent with the ISTS. This changes the CTS by moving the details of system operability to the associated TS bases.	Bases	ITS 5.5.10	1
ITS 3.1.7.1 CTS 3.1.3.2 (Unit 1)	LA.2	3.1.3.2 # footnote	The CTS 3.1.3.2 # footnote to the Mode 2 applicability contains procedural guidance that is intended to assist in stabilizing the rod position indication within the one hour thermal soak time. The guidance states that "To attain thermal equilibrium during the one hour soak time, the absolute value of rod motion shall not exceed 6 steps." The corresponding ISTS does not contain any similar requirements or footnotes. The proposed change moves this guidance to the TS bases. This changes the CTS by removing the requirement to restrict rod motion during the one hour thermal soak period from the TS.	Bases	ITS 5.5.10	3
ITS 3.1.4 CTS 3.1.3.4			<b>NONE</b>			
ITS 3.1.5 CTS 3.1.3.5			<b>NONE</b>			
ITS 3.1.6 CTS 3.1.3.6			<b>NONE</b>			

Table LA  
Removed Details  
Section 3.1 - Reactivity Control Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS - NA CTS 3.10.1, 3.10.2, & 3.10.3 (U1)			<b>NONE</b>			
ITS 3.1.9 CTS 3.10.3 (Unit 2) CTS 3.10.4 (Unit 1)			<b>NONE</b>			
ITS 3.1.10 CTS - NA			<b>NONE</b>			

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- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms



Table LA  
Removed Details  
Section 3.2 - Power Distribution Limits

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.2.3 CTS 3.2.1			NONE			
ITS 3.2.1 CTS 3.2.2			NONE			
ITS 3.2.2 CTS 3.2.3	LA.1	3.2.3 LCO	CTS 3.2.3 requires that $F_{\Delta H}^N$ be limited by an equation, which is contained in the CTS LCO along with the explanation of the terms used in the equation. The corresponding ISTS LCO 3.2.2 states, " $F_{\Delta H}^N$ shall be within the limits specified in the COLR" and the associated ISTS surveillance also refers to the limit specified in the COLR. The CTS LCO and surveillance are revised to conform to the ISTS. This changes the CTS by relocating the equation and associated explanations to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.3	1
ITS 3.2.2 CTS 3.2.3	LA.2	4.2.3.1, 4.2.3.2	The CTS surveillance 4.2.3.1 requires that $F_{\Delta H}^N$ be determined within the limit by using the movable incore detectors to obtain a power distribution map. In addition, CTS surveillance 4.2.3.2 requires that the measured $F_{\Delta H}^N$ be increased by 4% for measurement uncertainty. The corresponding ISTS surveillance SR 3.2.2.1 does not contain this level of detail. The CTS requirements mentioned above are contained in the Bases discussion for the ISTS surveillance SR 3.2.2.1. The CTS is revised to conform to the ISTS. This changes the CTS by moving the details for performing this surveillance to the associated bases description.	Bases	ITS 5.5.10	3
ITS 3.2.4 CTS 3.2.4			NONE			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.1 CTS 3.3.1.1	LA.1	4.3.1.1.3	CTS Surveillance 4.3.1.1.3 specifies that response time testing be performed for the RTS instrument Functions. The CTS surveillance includes details for performing the testing that specify "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months". The corresponding ISTS surveillance requirement specifies the same test be performed on a Staggered Test Basis. The CTS is revised to conform to the ISTS and the CTS details for performing response time testing on logic trains (replaced by the ISTS defined test term Staggered Test Basis) is moved into the bases for the response time test surveillance.	SR Bases	ITS 5.5.10	3
ITS 3.3.1 CTS 3.3.1.1	LA.2	Table 3.3-1	The Channels To Trip column in CTS Table 3.3-1 is deleted consistent with the ISTS. The corresponding ISTS RTS Table 3.3.1-1 does not include this information. The channels required to initiate an RTS function trip is described in the ITS Bases for each RTS Function.	Bases	ITS 5.5.10	1
ITS 3.3.1 CTS 3.3.1.1	LA.3	Functions 12 & 13	The CTS RTS Functions 12 and 13 (Loss of Flow) contain operational descriptions of how these Functions work. CTS Function 12, is effective above the P-8 interlock and provides a reactor trip with low flow in a single RCS loop. CTS Function 13 is effective above the P-7 interlock and below the P-8 interlock and provides a reactor trip with low flow in two RCS loops. However, these CTS Functions utilize the same instrumentation and setpoints. In the ISTS, the operation of this RTS Function above and below the P-8 interlock is described in the RTS bases and the ISTS only specifies a single low flow Function that requires the affected instrument channels operable above the P-7 interlock. The CTS is revised consistent with the ISTS. This changes the CTS by moving the description of the Function design and operation into the associated RTS bases.	Bases	ITS 5.5.10	1
ITS 3.3.1 CTS 3.3.1.1	LA.4	Functions 11, 13, 14, 23d & 23e	The allowable values specified for CTS Functions 11, 13, 14, 23d, and 23e on Table 3.3-1 contain design related descriptions that help to describe the allowable values (e.g., % of instrument span, % of indicated flow, or whether the setpoint is applied going up or down in power). The corresponding ISTS allowable values specified on Table 3.3.1-1 do not contain this additional descriptive information and simply present the allowable values as numerical values denoted as a percent. The CTS allowable values are revised to conform more closely to the corresponding ISTS allowable values. This changes the CTS by moving the design details associated with each allowable value listed above into the Bases description of the associated RTS Function.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.1 CTS 3.3.1.1	LA.5	Action Note 6	CTS Action Note 6 modifying CTS Action 7 (applicable to the OverTemperature (OT) and OverPower (OP) RTS Functions) states; "An OPERABLE hot leg channel consists of: 1) three RTDs per hot leg, or 2) two RTDs per hot leg with the failed RTD disconnected and the required bias applied." The corresponding ISTS Action Condition E does not contain this level of detail describing the system operability requirements. The CTS is revised to conform to the ISTS. This changes the CTS by removing the descriptive detail contained in Note 6 and placing it in the ISTS bases for the OT and OP RTS Functions.	Bases	ITS 5.5.10	3
ITS 3.3.1 CTS 3.3.1.1	LA.6	Action 44	Unit 2 only (Unit 1 does not have Action 44). Action 44 is applicable to the Unit 2 RTS Interlock Functions (i.e., P-6, P-8, P-9, etc.). CTS Action 44 specifies the following for an affected interlock; "determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition." The corresponding ITS Action Conditions O and P require the following; "verify interlock is in required state for existing unit conditions." The CTS Action is revised to conform to the ISTS. This changes the CTS by removing the specific procedural guidance explaining how to verify the interlock status (by observation of the associated permissive annunciator window(s)) from the TS and placing this guidance in the associated TS Bases.	Bases	ITS 5.5.10	3
ITS 3.3.1 CTS 3.3.1.1	LA.7	Table 4.3-1 Note 10	The refueling surveillance requirement on CTS Table 4.3-1 for the Manual Reactor Trip Function is modified by Note 10. CTS Note 10 states "The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip circuit(s)". The corresponding ISTS surveillance requirement does not contain this procedural detail for testing the Manual Reactor Trip Function. The CTS is revised to conform to the ISTS. This changes the CTS by moving the procedural instructions in CTS Note 10 to the bases for the affected surveillance requirement.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.3A - 3.3.1, Reactor Trip System Instrumentation

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.1 CTS 3.3.1.1	LA.8	Table 4.3-1 Note 11	The CTS surveillance requirements for the Reactor Trip Breakers (RTBs) specified on Table 4.3-1 require a Channel Functional Test (CFT). The CTS CFT is modified by a note (#11) that states "The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers." The corresponding ISTS surveillance (SR 3.3.1.4) specifies a Trip Actuating Device Operational Test (TADOT) be performed on the RTBs. The ISTS surveillance does not contain the same note as the CTS CFT. The CTS is revised to conform to the ISTS. This changes the CTS by moving the CTS surveillance note into the ITS Bases associated with the surveillance.	Bases	ITS 5.5.10	3
ITS 3.3.1 CTS 3.3.1.1	LA.9	Table 4.3-1 Note 12	The CTS monthly CFT surveillance for the RTB Bypass Breakers specified in Table 4.3-1 is modified by a note (#12) that states "Local manual shunt trip prior to placing breaker in service." The CTS Note provides a test Frequency "prior to placing the breaker in service" and procedural detail for performing the test "local manual shunt trip." The corresponding ISTS surveillance (SR 3.3.1.4) contains a note that specifies the surveillance must be performed on the RTB Bypass Breakers prior to placing the Bypass Breakers in service. The CTS surveillance requirement is revised to conform to the ISTS. This changes the CTS requirement by moving the procedural guidance for performing the surveillance (the inclusion of the local manual shunt trip) to the TS Bases associated with the surveillance.	Bases	ITS 5.5.10	3
ITS 3.3.1 CTS 3.3.1.1	LA.10	Table 4.3-1 Note 13	The CTS refueling CFT surveillance for the RTB Bypass Breakers specified in Table 4.3-1 is modified by a note (#13) that states "Automatic undervoltage trip." The CTS Note provides procedural guidance for performing the required test. The corresponding ISTS surveillance requirement does not contain a similar note. The CTS surveillance is revised to conform to the ISTS surveillance. This changes the CTS by moving the procedural guidance for performing the surveillance into the TS Bases associated with the surveillance.	Bases	ITS 5.5.10	3

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- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.3 CTS 3.3.3.1 3.3.3.8			NONE			
ITS 3.3.4 CTS 3.3.3.5	LA.1	3.3.3.5 LCO	CTS LCO 3.3.3.5 states in part that the required channels "...shall be OPERABLE with readouts displayed external to the control room." ITS LCO 3.3.4 states "The Remote Shutdown System Functions shall be OPERABLE." The ITS does not contain a reference to readouts displayed external to the control room. The CTS is revised to conform to the ITS. This changes the CTS by moving the description of the display location to the associated ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.3.4 CTS 3.3.3.5	LA.2	Table 3.3-9	The CTS LCO 3.3.3.5 refers to CTS Table 3.3-9 for the required instrumentation. ITS LCO 3.3.4 simply states that "The Remote Shutdown System Functions shall be OPERABLE." The detail from CTS Table 3.3-9 is moved to the ITS Bases and reformatted as ITS Table 3.3.4 –1.	Bases	ITS 5.5.10	1
ITS 3.3.5 CTS 3.3.2.1	LA.1	Table 3.3-3	The Channels To Trip column in CTS Table 3.3-3 is deleted consistent with the ISTS. The corresponding ITS 3.3.5 Table 3.3.5-1 does not include this information. This information is included in the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.3.5 CTS 3.3.2.1	LA.2	Table 3.3-3	Unit 1 only. Unit 1 CTS Table 3.3-3 for function 6.a.2 in the Allowable Value column states the following, " ≥ 71.2% of rated bus voltage with a < 0.9 second time delay (includes auxiliary relay times)." The corresponding ITS Allowable Value specified for this Unit 1 instrument function is ≥ 2962 V with a time delay of < 0.9 second. The CTS Allowable Value is revised to conform to the ITS. As such, the CTS is revised by moving the requirement that the time delay includes auxiliary relay times from the Allowable Value to the ITS Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.6 (Unit 2 only) CTS 3.9.9 & CTS 3.3.3.1	LA.1	Tables 3.3-6 & 4.3-3	Unit 2 only. CTS Tables 3.3-6 and 4.3-3 specify the requirements for the radiation monitors associated with the containment purge and exhaust isolation system. The CTS Tables also describe the radiation monitors as "(Xe-133)" and "(2HVR-RQ104A & B)" and include the measurement range of the monitors. The corresponding ITS requirements do not contain this descriptive design information. The CTS is revised to conform to the ITS. This changes the CTS by moving the description of the monitors (Xe-133) and (2HVR-RQ104A & B) and the measurement range from the TS to the Bases associated with ITS 3.3.6.	Bases	ITS 5.5.10	1
ITS 3.3.7 CTS 3.3.3.1	LA.1	Tables 3.3-6 & 4.3-3	CTS Tables 3.3-6 and 4.3-3 specify the requirements for the radiation monitors associated with the control room emergency ventilation system (CREVS). The CTS Tables also describe the radiation monitors as "RM-1RM-218 A&B (for Unit 1) and 2RMC-RQ201 & 202 (for Unit 2)." The CTS also includes the measurement range of the monitors. The corresponding ITS requirements do not contain this descriptive design information. The CTS is revised to conform to the ITS. This changes the CTS by moving the description of the monitors and the measurement range from the CTS to the Bases associated with ITS 3.3.7.	Bases	ITS 5.5.10	1
ITS 3.3.8 CTS 3.3.1.1	LA.1	Table 3.3-1, Function 6.b	CTS Table 3.3-1 specifies the requirements for the Source Range instrumentation. For Function 6.b, the CTS Table specifies the total number of channels as two. The corresponding ITS LCO 3.3.8, "Boron Dilution Detection Instrumentation" specifies one Source Range channel operable. The ITS does not describe the total number of channels but the number of channels required operable. The CTS is revised to conform to the ITS. This changes the CTS by moving the total number of channels from the specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.3.8 CTS 3.3.1.1	LA.2	Table 3.3-1, Function 6, Note 8	Unit 2 only. Unit 2 CTS Table 3.3.1 Function 6 specifies the Source Range Neutron Flux requirements. The Unit 2 requirements are modified by Note (8) that states "Alternate detectors may only be used for monitoring purposes Without Rod Withdrawal Capability until detector functions are modified to permit equivalent alarm and trip functions." The corresponding ITS LCO 3.3.8 does not contain a similar note. The CTS is revised to conform to the ISTS. This changes the CTS by moving the allowance for using alternate Source Range detectors for indication purposes from CTS Table 3.3-1 to the ITS 3.3.8 Bases.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.3B - Instrumentation (Other than RTS & ESFAS)

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.8 CTS 3.3.1.1	LA.3	Table 3.3-1, Notes 8 & 9	The applicable Modes in CTS Table 3.3-1 for the Source Range instrumentation specify Modes 3, 4, and 5. The Modes are modified by Note 8 (Unit 1) and Note 9 (Unit 2). The Note states, "In this condition, source range Function does not provide reactor trip but does provide indication." The corresponding ITS LCO 3.3.8 "Boron Dilution Detection Instrumentation" does not contain a similar note. The CTS is revised to conform to the ITS. This changes the CTS by moving the description of the Source Range instrument operation requirements from the CTS Table 3.3-1 to the ITS 3.3.8 bases.	Bases	ITS 5.5.10	2
ITS 3.3.8 CTS 3.3.1.1	LA.4	CTS Action 5	CTS Action 5 states, in part, for an inoperable Source Range channel, "Close unborated water source isolation valves (2CHS-91, 2CHS-96 and 2CHS-138) or (2CHS-37 and 2CHS-828)" for Unit 2 and "(1CH-90) or (1CH-91 and 1CH-93)" for Unit 1. ITS 3.3.8 Required Action A.2.2.1 states "Close unborated water source isolation valves" within 1 hour. The ITS does not include specific valve numbers in the specification. The ITS retains the specific valve numbers in the Bases for ITS 3.1.8, "Unborated Water Source Isolation Valves." The Bases for ITS 3.3.8 refers to ITS 3.1.8 for the specific valves. The CTS Action is revised to conform to the ITS. This changes the CTS by moving the specific valve ID numbers from the specification to the ITS 3.1.8 Bases.	Bases	ITS 5.5.10	1
ITS 3.3.8 CTS 3.3.1.1	LA.5	Table 4.3-1, Note 15	CTS LCO 3.3.1 Table 4.3-1 specifies the surveillance requirements applicable to the Source Range instrumentation. Note 15 on Table 4.3-1 modifies the Source Range instrumentation surveillance requirements by specifying "Surveillance Requirements need not be performed on alternate detectors until connected and required for OPERABILITY." The corresponding ITS LCO 3.3.8 surveillance requirements are not modified by a similar note. The CTS requirements are revised to conform to the ITS. This changes the CTS by moving the statement that surveillance requirements need not be performed on alternate detectors until connected and required for OPERABILITY from the specification to the ITS Bases.	Bases	ITS 5.5.10	1

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.2 CTS 3.3.2.1	LA.1	4.3.2.1.3	CTS Surveillance 4.3.2.1.3 specifies that response time testing be performed for the ESFAS instrument Functions. The CTS surveillance includes guidance for performing the testing that specifies "Each test shall include at least one logic train such that both logic trains are tested at least once per 36 months". The corresponding ISTS surveillance requirement does not contain similar guidance for performing the response time testing. The CTS is revised to conform to the ISTS and the CTS guidance for performing response time testing is moved into the bases for the response time test surveillance.	Bases	ITS 5.5.10	3
ITS 3.3.2 CTS 3.3.2.1	LA.2	Table 3.3-3	The Channels To Trip column in CTS Table 3.3-3 is deleted consistent with the ISTS. The corresponding ISTS ESFAS Table 3.3.2-1 does not include this information. The system description of each ESFAS Function is contained in the ISTS bases.	Bases	ITS 5.5-10	1
ITS 3.3.2 CTS 3.3.2.1	LA.3	Table 3.3-3	The CTS requirements for the steam generator (SG) water level low-low instrumentation used to start the AFW pumps are divided into the two functions performed by the instrumentation (i.e., start of the Turbine Driven AFW pump and start of the Motor-Driven AFW pumps). The corresponding ISTS requirements simply list the required instrumentation without attempting to present it in terms of the Functions it performs. The instrument functions are described in the ISTS Bases. The CTS is revised to conform to the ISTS. This changes the CTS by simplifying the presentation of the required channels to a single line item in CTS Tables 3.3-3 and 4.3-2 and moving the description of the instrument functions to the Bases.	Bases	ITS 5.5-10	1
ITS 3.3.2 CTS 3.3.2.1	LA.4	Table 3.3-3	The titles of the CTS AFW ESFAS Functions contain an additional description of the Function that includes the specific pump start feature of each Function (e.g., start of Turbine-Driven Pump). The corresponding ISTS Functions do not contain this descriptive information. The CTS is revised to conform to the ISTS. This changes the CTS by moving the Function design descriptions to the Bases.	Bases	ITS 5.5.10	1



Table LA  
Removed Details  
Section 3.3C - 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.3.2 CTS 3.3.2.1	LA.5	Table 3.3-3, 5.b & 7.b	The allowable values specified for CTS SG level Functions 5.b and 7.b on Table 3.3-3 contain design related descriptions that help to describe the allowable values (i.e., % of narrow range instrument span.). The corresponding ISTS allowable values specified on Table 3.3.2-1 do not contain this additional descriptive information and simply present the allowable values as numerical values denoted as a percent. The CTS allowable values are revised to conform more closely to the corresponding ISTS allowable values. This changes the CTS by moving the design details associated with each allowable value listed above into the Bases description of the associated ESFAS Function.	Bases	ITS 5.5.10	1
ITS 3.3.2 CTS 3.3.2.1	LA.6	Action 36	CTS Action 36 is applicable to the SI Automatic Actuation Logic ESFAS Function. The CTS Action contains a description of the P-4 interlock operation that blocks the SI Automatic Actuation Logic after SI initiation and subsequent reset. The ISTS does not contain a corresponding Action or description in the TS. The CTS is revised to conform to the ISTS. This changes the CTS by removing the description of the system design and operation from the Action and placing this information in the Bases for the SI Automatic Actuation Logic and Relays.	Bases	ITS 5.5.10	3
ITS 3.3.2 CTS 3.3.2.1	LA.7	Action 38	Action 38 is applicable to the ESFAS Interlock Functions (i.e., P-11, and P-12). CTS Action 38 specifies the following for an affected interlock; "...determine by observation of the associated permissive annunciator window(s) (bistable status lights or computer checks) that the interlock is in its required state for the existing plant condition". The corresponding ITS Action Condition K requires the following; "verify interlock is in required state for existing unit conditions." The CTS Action is revised to conform to the ISTS. This changes the CTS by removing the specific procedural guidance explaining how to verify the interlock status (i.e., determine by observation of the associated permissive annunciator window(s) (bistable status lights or computer checks)) from the TS and placing this guidance in the associated TS Bases for the Action.	Bases	ITS 5.5.10	3

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.1 CTS 3.2.5	LA.1	LCO, Footnote 3	CTS 3.2.5 LCO requirement c specifies the required RCS flow. Footnote 3 to the required RCS flow states that the specified flow is an analytical limit used in the safety analysis. The corresponding ISTS LCO requirement does not have any descriptive text associated with it. The CTS is revised to conform to the ISTS and the descriptive information associated with the LCO requirement is moved into the bases.	Bases	ITS 5.5.10	1
ITS 3.4.2 CTS 3.1.1.5			<b>NONE</b>			
ITS 3.4.4 CTS 3.4.1.1	LA.1	4.4.1.1	CTS Surveillance 4.4.1.1 specifies that the required reactor coolant loops shall be verified to be in operation and circulating reactor coolant at least once per 12 hours. The corresponding ISTS SR 3.4.4.1 specifies that each reactor coolant loop shall be verified to be in operation every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by moving the specific requirement to verify that the reactor coolant loops are circulating reactor coolant to the Bases.	Bases	ITS 5.5.10	3
ITS 3.4.5 CTS 3.4.1.2	LA.1	LCO	CTS 3.4.1.2 specifies the requirements for RCS loops in Mode 3. The CTS 3.4.1.2 LCO contains a description of the required RCS loop (i.e., "and associated Steam Generator and RCP"). The Corresponding ISTS 3.4.5 simply requires two RCS loops to be OPERABLE. Further descriptions of an operable loop are contained in the ISTS bases. The CTS is revised to conform with the ISTS. This changes the CTS by moving the descriptive details of what constitutes an OPERABLE RCS loop to the Bases.	Bases	ITS 5.5.10	1
ITS 3.4.5 CTS 3.4.1.2	LA.2	4.4.1.2.1	CTS Surveillance 4.4.1.2.1 specifies that the required RCS loops be verified in operation and circulating reactor coolant at least once per 12 hours. The corresponding ISTS SR 3.4.5.1 specifies that the required RCS loops be verified in operation every 12 hours. The CTS is revised to conform to the ISTS. This changes the CTS by moving the specific requirement to verify that the RCS loops are circulating reactor coolant to the Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.6 CTS 3.4.1.3	LA.1	LCO	CTS 3.4.1.3 requires that two coolant loops consisting of any of the listed RCS loops and RHR loops shall be OPERABLE and one loop in operation. The CTS LCO contains a list of all the RHR and RCS loops with a description of what constitutes an OPERABLE loop. The corresponding ISTS 3.4.6 requires two loops consisting of any combination of RCS and RHR loops to be OPERABLE and one loop in operation. The ISTS does not contain a list of all the loops that may be used to meet the LCO with a description of what constitutes an operable loop. The CTS is revised to conform to the ISTS. This changes the CTS by moving the details of what constitutes an OPERABLE loop to the Bases.	Bases	ITS 5.5.10	1
ITS 3.4.6 CTS 3.4.1.3	LA.2	4.4.1.3.3	CTS surveillance 4.4.1.3.3 specifies the required steam generator water level as narrow range. CTS surveillance 4.4.1.3.4 specifies that a required operating loop be "circulating reactor coolant." The corresponding ISTS surveillances do not contain "narrow range" or "circulating reactor coolant." The CTS surveillances are revised to conform to the ISTS. This changes the CTS surveillances by removing the descriptive details mentioned above from the TS and placing them in the associated Bases.	Bases	ITS 5.5.10	3
ITS 3.4.7 CTS 3.4.1.3	LA.1	LCO	CTS 3.4.1.3 requires at least two of the listed coolant loops to be operable and one loop in operation. The CTS LCO refers to the listed RHR loops as RHR pump A and heat exchanger A, and RHR pump B and heat exchanger B. The corresponding ISTS LCO requirement also requires two loops to be operable and one RHR loop to be in operation. The ISTS LCO refers to the listed RHR systems as simply operable RHR loops. The CTS is revised to conform to the ISTS. This changes the CTS LCO by moving the description of an operable RHR loop (pump & heat exchanger) to the TS bases.	Bases	ITS 5.5.10	1
ITS 3.4.7 CTS 3.4.1.3	LA.2	4.4.1.3.3, 4.4.1.3.4	CTS surveillances 4.4.1.3.3 and 4.4.1.3.4 specify that the required steam generator water level be in percent narrow range and that the required operating loop be circulating reactor coolant. The corresponding ISTS 3.4.7 surveillances do not contain these details. The CTS surveillance is revised to conform to the ISTS. This changes the CTS surveillance by removing the descriptive detail mentioned above from the TS and placing it in the associated Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.8 CTS 3.4.1.3	LA.1	LCO	CTS 3.4.1.3 requires at least two of the listed coolant loops to be operable and one loop in operation. The CTS LCO refers to the listed RHR loops as RHR pump A and heat exchanger A, and RHR pump B and heat exchanger B. The corresponding ISTS LCO requirement also requires two loops to be operable and one RHR loop to be in operation. The ISTS LCO refers to the listed RHR systems as simply operable RHR loops. The CTS is revised to conform to the ISTS. This changes the CTS LCO by moving the description of an operable RHR loop (pump & heat exchanger) to the TS bases.	Bases	ITS 5.5.10	1
ITS 3.4.8 CTS 3.4.1.3	LA.2	4.4.1.3.4	CTS surveillance 4.4.1.3.4 specifies that a required operating loop be "circulating reactor coolant." The corresponding ISTS 3.4.8 surveillance does not contain "circulating reactor coolant." The CTS surveillance is revised to conform to the ISTS. This changes the CTS surveillance by removing the descriptive details mentioned above from the TS and placing them in the associated Bases.	Bases	ITS 5.5.10	3
ITS 3.4.17 CTS 3.4.1.4.1			<b>NONE</b>			
ITS 3.4.18 CTS 3.4.1.5	LA.1		Not used.			
ITS 3.4.10 CTS 3.4.3	LA.1	LCO Note	The setpoint specified in CTS LCO 3.4.3 is modified by a note that states that the pressurizer lift setting pressure shall correspond to ambient conditions of the valve at nominal temperature and pressure. ISTS 3.4.10 does not contain this information in the TS. The ISTS contains this information in the Bases. The CTS is revised to conform to the ISTS. This changes the CTS by moving the note information to the Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.10 CTS 3.4.3	LA.2	Action b	CTS 3.4.3 Action b requires that after any pressurizer code safety valve lift, involving loop seal discharge (Unit 2 only) or water discharge (both Units); be in at least HOT STANDBY within the next 6 hours, and in HOT SHUTDOWN with any RCS cold leg temperature $\leq$ the enable temperature specified in the PTLR and apply RCS overpressure protection requirements in accordance with Specification 3.4.9.3 within the following 6 hours. The ISTS does not contain any similar action for a safety valve lift involving loop seal or water discharge. The CTS is revised to conform to the ISTS. This changes the CTS 3.4.3 by relocating Action b to the Licensing Requirements Manual (LRM).	LRM	10CFR50.59	3
ITS 3.4.9 CTS 3.4.4			<b>NONE</b>			
ITS 3.4.20 CTS 3.4.5	LA.1		Not used.			
ITS 3.4.15 CTS 3.4.6.1	LA.1	Table 3.3-6	CTS Table 3.3-6 contains the specific equipment mark numbers for the RCS leakage detection radiation monitors. The corresponding requirements in ISTS 3.4.15, RCS Leakage Detection Instrumentation, do not contain specific equipment mark numbers. The CTS is revised to conform to the ISTS. This changes the CTS by moving the specific equipment mark numbers of the RCS leakage detection radiation monitors to the RCS leakage detection instrumentation TS bases (3.4.15).	Bases	ITS 5.5.10	1
ITS 3.4.15 CTS 3.4.6.1	LA.2	Table 3.3-6	CTS Table 3.3-6 contains the measurement range of the required RCS leakage detection radiation monitors. The corresponding requirements in ISTS 3.4.15, RCS Leakage Detection Instrumentation, do not contain this level of design detail. The CTS is revised to conform to the ISTS. This changes the CTS by removing the measurement range of the RCS leakage detection radiation monitors from the TS. This information is already contained in the Unit 1 and 2 UFSARs.	USFAR	10CFR50.59	1
ITS 3.4.13 CTS 3.4.6.2			<b>NONE</b>			

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.14 CTS 3.4.6.3	LA.1	Table 4.4-3	CTS Table 4.4-3 contains the list of RCS pressure isolation valves (PIVs) that are addressed by CTS 3.4.6.3. The corresponding ISTS 3.4.14, RCS PIVs, does not contain a list of valves for which the TS applies. The CTS is revised to conform to the ISTS. This changes the CTS by moving the specific list of RCS PIVs and associated valve specific notes to the Licensing Requirements Manual (LRM).	LRM	10CFR 50.59	1
ITS 3.4.14 CTS 3.4.6.3	LA.2	footnotes	The CTS 3.4.6.3 Actions and surveillance requirements contain footnotes with prescriptive detail for meeting the Actions and surveillances. The corresponding ISTS Actions and surveillances does not contain this detail. The CTS is revised to conform to the ISTS. This changes the CTS by moving the details of these footnotes to the TS Bases.	Bases	ITS 5.5.10	3
ITS 3.4.14 CTS 3.4.6.3	LA.3	Table 4.4-3, Note (c)	CTS Table 4.4-3 Note (c) provides the allowance to verify the RHR cold leg isolation valve leakage by monitoring the valve leakage during plant operation. The ISTS does not contain a similar allowance. However, the ISTS SR 3.4.14.1 only specifies that PIV leakage must be verified. The ISTS surveillance does not specify that a leak rate test be performed for each valve. The associated ISTS bases contains the details of the required testing. The CTS is revised to be more consistent with the ISTS. This changes the CTS by moving the description of how the surveillance is met for the RHR cold leg isolation valves to the SR 3.4.14 Bases text.	Bases	ITS 5.5.10	3
ITS 3.4.16 CTS 3.4.8			<b>NONE</b>			
ITS 3.4.3 CTS 3.4.9.1	LA.1	LCO	CTS 3.4.9.1 requires that the RCS (except the pressurizer) temperature and pressure be limited in accordance with the PTLR. The CTS includes requirements for the heatup and cooldown rates as well. The corresponding ISTS 3.4.3 requires that the RCS pressure, temperature, and RCS heatup and cooldown rates shall be maintained within the limits specified in the PTLR. The CTS is revised to conform to the ISTS. This changes the CTS by moving the exclusion of the pressurizer from the LCO to the Bases.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4	LA.1	LCO	The Unit 2 CTS 3.4.9.3 LCO requires "two power-operated relief valves (PORVs) with nominal-maximum lift settings which vary with the RCS temperature and which do not exceed the limits specified in the PTLR...." The Unit 1 CTS 3.4.9.3 requires "Two power operated relief valves (PORVs) with a nominal maximum lift setting within limits specified in the PTLR." The corresponding ISTS 3.4.12 LCO requires "two power operated relief valves (PORVs) with lift settings within the limits specified in the PTLR." The CTS Unit 1 and 2 LCO is revised to conform to the ISTS LCO. This changes the CTS LCO by removing the details describing the PORV overpressure protection system (OPPS) setpoint design to the PTLR.	PTLR	ITS 5.6.4	1
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4	LA.2	LCO Note	The CTS LCO 3.4.9.3 contains a note that modifies the requirement for isolation of the accumulators. The CTS note specifies in part that the accumulator be isolated with power removed from the discharge isolation valves. The corresponding ISTS 3.4.12 accumulator LCO requirements simply specify that the accumulators are isolated and do not contain requirement regarding the removal of power to the isolation valves. The ISTS bases explain that the accumulator isolation valves are "immobilized". The CTS is revised to conform to the ISTS. This changes the CTS by removing details for meeting the TS requirements from the TS to the bases.	Bases	ITS 5.5.10	3
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4	LA.3	4.4.9.3.1.b	CTS surveillance 4.4.9.3.1.b contains an exception to the LCO requirement that allows the accumulator discharge isolation valves to be opened. The CTS surveillance also explains that the LCO exception is to allow accumulator discharge check valve testing. The corresponding ISTS 3.4.12 contains a similar LCO exception as a note to the LCO (not in the surveillance). However, the ISTS LCO note does not contain an explanation of what testing may be accomplished with the LCO exception. The ISTS note and the testing it allows are explained in the bases. The CTS is revised to conform to the ISTS. This changes the CTS by removing the explanation of what testing is accomplished using the LCO exception from the TS and putting it in the bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.4.12 CTS 3.4.9.3 U1 CTS 3.5.4	LA.4	4.4.9.3.3.b	The CTS surveillance 4.4.9.3.3.b contains a list of RCS vents for which the status can be verified every 31 days. The corresponding ISTS surveillance SR 3.4.12.5 only specifies that the 31-day surveillance interval applies to RCS vents other than unlocked open valves. The ISTS contains a list of the types of vents for which the 31-day frequency applies in the Bases for the surveillance. The CTS is revised to conform to the ISTS. This changes the CTS by removing the list of vents from the surveillance and placing the list in the bases.	Bases	ITS 5.5.10	3
ITS 3.4.11 CTS 3.4.11	LA.1	Actions b & d	CTS Actions b and d contain provisions that allow continued operation with a single inoperable PORV not capable of being manually cycled or a single inoperable PORV block valve. The CTS Actions require that the PORV is isolated and the block valve is closed in order to allow operation to continue. In addition, the CTS specifies that operation may continue until the next refueling outage. The corresponding ISTS 3.4.11 does not contain Actions that allow continued operation with a single inoperable PORV not capable of being manually cycled or a single inoperable PORV block valve. However, ISTS 3.4.11 Action A.1 allows for continued operation with a single inoperable PORV that can be manually cycled. The Bases for ISTS Action A.1 states that operation may continue until the next refueling outage when the valve may be repaired. The additional provisions of the CTS Actions that allow for continued operation with a single inoperable valve are retained in the proposed BVPS specific ITS with one exception. The provisions of the CTS Actions that limit the continued operation until the next refueling outage are moved to the proposed BVPS ITS bases associated with the Actions. The placement of this information in the Bases is consistent with the ISTS as described above.	Bases	ITS 5.5.10	3
ITS 3.4.19 U1 CTS 3.10.5 U2 CTS 3.10.4			<b>NONE</b>			

\* Change Types:



Table LA  
Removed Details  
Section 3.4 - Reactor Coolant System

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.5.1 CTS 3.5.1	LA.1	4.5.1.a.1	CTS 4.5.1.a.1 specifies that each accumulator shall be demonstrated OPERABLE by verifying the usable borated water volume is within limits once per 12 hours. The corresponding ITS SR 3.5.1.2 specifies that the borated water volume of each accumulator be verified to be within the required limits every 12 hours. The CTS are revised to conform to the ISTS. This changes the CTS by moving the requirement to verify that the "usable" borated water volume is within limits to the Bases.	Bases	ITS 5.5.10	3
ITS 3.5.1 CTS 3.5.1	LA.2	4.5.1.c	CTS 4.5.1.c specifies that each accumulator shall be demonstrated OPERABLE by verifying that the power to the isolation valve operator control circuit is disconnected by removal of the plug in the lock out jack from the circuit once per 31 days. The corresponding ITS SR 3.5.1.5 specifies the verification that power is removed from each accumulator isolation valve operator control circuit every 31 days. The CTS are revised to conform to the ISTS. This changes the CTS by moving the procedural detail of control circuit power removal (i.e., removal of the plug in the lock out jack from the circuit) to the Bases.	Bases	ITS 5.5.10	3
ITS 3.5.2 CTS 3.5.2	LA.1	LCO	CTS LCO 3.5.2 states that two separate and independent ECCS subsystems shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem (i.e., the required pumps and flow paths, including pump tag numbers for the Unit 2 recirculation spray pumps). ITS LCO 3.5.2 requires two ECCS trains to be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases. This changes the CTS by moving details of what constitutes an OPERABLE subsystem to the ITS Bases in the LCO section.	Bases	ITS 5.5.10	1
ITS 3.5.2 CTS 3.5.2	LA.2	U1 CTS 4.5.2.a and U2 CTS 4.5.2.a.1	Unit 1 CTS 4.5.2.a and Unit 2 CTS 4.5.2.a.1 specify that each ECCS subsystem shall be demonstrated OPERABLE by verifying, once per 12 hours, that the listed valves are in the indicated positions and that the power to the valve operator control circuit is disconnected by removal of the plug in the lock out circuit from each circuit. The corresponding ITS SR 3.5.2.1 requires verification, every 12 hours, that the listed valves are in the listed position with power to the valve operator control circuit removed. The CTS are revised to conform to the ISTS. This changes the CTS by moving the procedural detail of control circuit power removal (i.e., removal of the plug in the lock out circuit from each circuit) to the Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.5.2 CTS 3.5.2	LA.3	4.5.2.a.2	Unit 2 CTS 4.5.2.a.2 requires periodic verification that 2CHS*MOV373, the HHSI pump minimum flow valve, is open. For Unit 2, ITS SR 3.5.2.2 requires periodic verification that the HHSI pump minimum flow valve is open. This changes the CTS by moving details of the valve (i.e., the tag number) to which the SR applies to the ITS Bases for SR 3.5.2.2.	Bases	ITS 5.5.10	1
ITS 3.5.2 CTS 3.5.2	LA.4	4.5.2.a.2.1	Unit 2 CTS 4.5.2.a.2.1 and associated footnote (3) provide procedural details for meeting the TS requirement to verify that the HHSI pump minimum flow valve is open. For Unit 2, ITS SR 3.5.2.2 requires periodic verification that the HHSI pump minimum flow valve is open. This changes the CTS by moving procedural details of verifying this valve is open to the ITS Bases for SR 3.5.2.2.	Bases	ITS 5.5.10	3
ITS 3.5.2 CTS 3.5.2	LA.5	4.5.2.b	CTS 4.5.2.b requires periodic verification, in accordance with the Inservice Testing Program, that each listed (charging and low head safety injection) ECCS pump's developed head at the flow test point is greater than or equal to the required developed head as specified in the Inservice Testing Program and the ECCS Flow Analysis. ITS SR 3.5.2.4 requires periodic verification, in accordance with the Inservice Testing Program, that each ECCS pump's developed head at the flow test point is greater than or equal to the required developed head. This changes the CTS by moving procedural details associated with the type of pump and location of the specific acceptance criteria of "required developed head" to the ITS Bases for SR 3.5.2.4.	Bases	ITS 5.5.10	3
ITS 3.5.2 CTS 3.5.2	LA.6	4.5.2.d	CTS 4.5.2.d requires a visual inspection for loose debris in containment prior to establishing containment integrity and within affected areas of containment at the completion of containment entry when CONTAINMENT INTEGRITY is established. The ITS does not include this Surveillance Requirement. This changes the CTS by moving the requirement from the Technical Specifications to the Licensing Requirements Manual (LRM).	LRM	10CFR50.59	3
ITS 3.5.2 CTS 3.5.2	LA.7	LCO	CTS LCO 3.5.2 states "separate and independent" ECCS subsystems shall be Operable. ITS LCO 3.5.2 states ECCS trains shall be Operable. The CTS LCO is revised to conform to the ITS LCO. This changes the CTS LCO by removing the system description details (i.e., separate and independent) from the LCO. The CTS system description details are moved into the ITS Bases.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.5 - Emergency Core Cooling Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.5.3 CTS 3.5.3	LA.1	LCO	CTS LCO 3.5.3 states that one ECCS subsystem shall be OPERABLE and contains a description of what constitutes an OPERABLE subsystem (i.e., the required pumps and flow paths) including pump tag numbers for the Unit 2 recirculation spray pumps (in the * footnote). ITS LCO 3.5.3 requires one ECCS train to be OPERABLE, but the details of what constitutes an OPERABLE train are moved to the Bases. This changes the CTS by moving details of what constitutes an OPERABLE subsystem to the ITS Bases in the LCO section.	Bases	ITS 5.5.10	1
ITS 3.5.5 U2 CTS 3.5.4 U1 CTS 3.5.5	LA.1	Action a	Unit 1 CTS 3.5.5 Action a and Unit 2 CTS 3.5.4 Action a provide 4 hours, when seal injection flow is not within the limit, to adjust manual seal injection throttle valves to give a flow within the limit with charging pump discharge pressure greater than or equal to the required value and with the seal injection flow control valve full open. The corresponding ITS 3.5.5 Action A requires, in the same Condition, that the manual seal injection throttle valves be adjusted to give a flow within the limit within 4 hours. The CTS are revised to conform to the ISTS. This changes the CTS by moving the method of how to restore seal injection flow to within the limit to the Bases.	Bases	ITS 5.5.10	3
ITS 3.5.4 CTS 3.1.2.8	LA.1	4.1.2.8.a.2	CTS 4.1.2.8.a.2 specifies that the RWST shall be demonstrated OPERABLE by verifying the contained (Unit 1) or usable (Unit 2) borated water volume is within the specified limit(s) once per 7 days. The corresponding ITS SR 3.5.4.2 specifies that the borated water volume of the RWST be verified to be within the required limits every 7 days. The CTS is revised to conform to the ISTS. This changes the CTS by moving the description (i.e., usable) of the required borated water volume to the Bases.	Bases	ITS 5.5.10	3

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.6.1 CTS 3.6.1.1	LA.1	LCO	CTS 3.6.1 requires that primary containment integrity be maintained and provides Actions to restore containment integrity. The corresponding ISTS LCO specifies that containment shall be operable and provides Actions to restore the containment to operable status. The CTS LCO and Actions are revised to conform to the ISTS. This changes the CTS by replacing the requirement to maintain containment integrity with the requirement for the containment to be operable. The requirements specified in the defined term "containment integrity" describe the operability requirements for the containment. In the ISTS, the details of the operability requirements for each system or component specified in the TS are discussed in the Bases of the TS. This changes the CTS by moving the operability details into the bases.	Bases	ITS 5.5.10	3
ITS 3.6.1 CTS 3.6.1.1	LA.2	4.6.1.1.a.2	The CTS surveillance 4.6.1.1.a.2 specifies that all equipment hatches be verified closed. The corresponding ISTS surveillances do not contain a specific surveillance requirement to verify the status of the equipment hatch. As the equipment hatch is an integral part of the containment structure, the ISTS requires the equipment hatch closed as part of the operability requirements for the containment discussed in the Bases of ISTS 3.6.1. The CTS is revised to conform to the ISTS. This changes the CTS by moving the requirement for the equipment hatch to be closed into the Bases for ITS 3.6.1.	Bases	ITS 5.5.10	3
ITS 3.6.1 CTS 3.6.1.2			<b>NONE</b>			
ITS 3.6.2 CTS 3.6.1.3			<b>NONE</b>			
ITS 3.6.4 CTS 3.6.1.4			<b>NONE</b>			
ITS 3.6.5 CTS 3.6.1.5			<b>NONE</b>			

Table LA  
Removed Details  
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.6.1 CTS 3.6.1.6			<b>NONE</b>			
ITS 3.6.6 CTS 3.6.2.1	LA.1	LCO	CTS 3.6.2.1 requires that two separate and independent containment quench spray subsystems shall be operable. The corresponding ITS 3.6.6 requires two quench spray trains to be operable. The CTS is revised to conform to the ISTS. This changes the CTS by removing the details of system design (separate and independent) from the LCO requirement. The ITS bases describes the operability requirements for the quench spray system.	Bases	ITS 5.5.10	1
ITS 3.6.6 CTS 3.6.2.1	LA.2	4.6.2.1.b	CTS surveillance 4.6.2.1.b requires that the quench spray pump developed head at the flow test point be verified greater than or equal to the required developed head as specified in the Inservice Testing Program and the containment integrity safety analysis. The corresponding ISTS surveillance (ITS SR 3.6.6.2) specifies that the quench spray pump's developed head at the flow test point be verified greater than or equal to the required developed head. The CTS is revised to conform to the ISTS. This changes the CTS by relocating the text describing where the required flow test point and developed head are specified to the Bases.	Bases	ITS 5.5.10	3
ITS 3.6.6 CTS 3.6.2.1	LA.3	4.6.2.1.d	CTS surveillance 4.6.2.1.d requires each quench spray header nozzle to be verified unobstructed following maintenance which results in the potential for nozzle blockage, as determined by engineering evaluation. The corresponding ITS SR 3.6.6.5 specifies that the nozzles are verified to be unobstructed following maintenance that results in the potential for nozzle blockage. The CTS surveillance is revised to conform to the proposed ITS SR 3.6.6.5. This changes the CTS by relocating the method for determining the potential for nozzle blockage (engineering evaluation) to the bases for ITS SR 3.6.6.5.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.6.7 CTS 3.6.2.2	LA.1	LCO	CTS 3.6.2.2 requires that four separate and independent containment recirculation spray subsystems, each composed of a spray pump, associated heat exchanger and flow path shall be operable. The corresponding ITS 3.6.7 requires four recirculation spray subsystems to be operable. The CTS is revised to conform to the ISTS. This changes the CTS by removing the details of system design (separate and independent and system components) from the LCO requirement. The ITS Bases describes the operability requirements for the recirculation spray system.	Bases	ITS 5.5.10	1
ITS 3.6.7 CTS 3.6.2.2	LA.2	4.6.2.2.c	CTS surveillance 4.6.2.2.c requires the RSS pumps start on a Containment Pressure high-high signal after the required time delay. The corresponding ITS 3.6.7 surveillance SR 3.6.7.3.b simply specifies that the automatic start of each RSS pump be verified. The CTS is revised to conform to the ISTS. This changes the CTS by removing the details of system operation (specific start signal and time delay) from the surveillance requirement to the ITS Bases.	Bases	ITS 5.5.10	2
ITS 3.6.7 CTS 3.6.2.2	LA.3	4.6.2.2.d	CTS surveillance 4.6.2.2.d requires that the RSS pump developed head at the flow test point be verified greater than or equal to the required developed as specified in the Inservice Testing Program and the containment integrity safety analysis. The corresponding ISTS surveillance (ITS SR 3.6.7.2) specifies that the RSS pump's developed head at the flow test point be verified greater than or equal to the required developed head. The CTS is revised to conform to the ISTS. This changes the CTS by relocating the text describing where the required flow test point and developed head are specified to the Bases.	Bases	ITS 5.5.10	3
ITS 3.6.7 CTS 3.6.2.2	LA.4	4.6.2.2.f	CTS surveillance 4.6.2.2.f requires each RSS header nozzle to be verified unobstructed following maintenance which results in the potential for nozzle blockage, as determined by engineering evaluation. The corresponding ITS SR 3.6.7.4 specifies that the nozzles are verified to be unobstructed following maintenance that results in the potential for nozzle blockage. The CTS surveillance is revised to conform to the proposed ITS SR 3.6.7.4. This changes the CTS by relocating the method for determining the potential for nozzle blockage (engineering evaluation) to the bases for ITS SR 3.6.7.4.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.6 - Containment Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.6.8 CTS 3.6.2.3	LA.1	LCO	CTS 3.6.2.3 LCO requires that two chemical injection subsystems each capable of adding NaOH solution from the chemical addition tank to a containment quench spray system pump flow be operable. The corresponding ITS 3.6.8 LCO specifies that the spray additive system shall be operable. The CTS is revised to conform to the ISTS. This changes the CTS by removing the details of system design (two chemical injection subsystems) from the LCO requirement. The ITS Bases describe the operability requirements for the chemical addition system.	Bases	ITS 5.5.10	1
ITS 3.6.8 CTS 3.6.2.3	LA.2	4.6.2.3.b, 4.6.2.3.c.2	CTS surveillance 4.6.2.3.b contains the required flow rate for the chemical injection pumps. CTS surveillance 4.6.2.3.c.1 specifies that the required tank volume is a "contained" volume. CTS Surveillance 4.6.2.3.c.2 specifies that the required concentration of NaOH be verified by "chemical analysis". The corresponding ITS 3.6.8 surveillance requirements do not contain this level of detail. The CTS is revised to conform to the ITS. This changes the CTS by moving the details for meeting the surveillance requirements to the bases for each affected surveillance.	Bases	ITS 5.5.10	3
ITS 3.6.3 CTS 3.6.3.1			<b>NONE</b>			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms



Table LA  
Removed Details  
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.7.1 CTS 3.7.1.1	LA.1	Table 3.7-2 footnote	CTS 3.7.1.1, Table 3.7-2, is modified by a footnote that states, "The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure." ITS 3.7.1 does not contain details on setting the lift pressure. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by moving the details on setting the lift pressure to the Bases.	Bases	ITS 5.5.10	3
ITS 3.7.5 CTS 3.7.1.2	LA.1	LCO	CTS 3.7.1.2 requires three AFW trains be OPERABLE. The CTS LCO contains a list of AFW pumps and flow paths with a description of what constitutes an OPERABLE train. The corresponding ITS 3.7.5 requires three AFW trains be OPERABLE. The ITS does not contain a list or description of all the train flow paths (or what constitutes an operable train) that may be used to meet the LCO. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by moving the details of what constitutes an OPERABLE train to the Bases.	Bases	ITS 5.5.10	1
ITS 3.7.5 CTS 3.7.1.2	LA.2	Note (1)	Note (1) of CTS 3.7.1.2 states only one AFW train, capable of providing flow to the steam generator(s) relied upon for heat removal, is required to be OPERABLE in MODE 4. The corresponding ITS 3.7.5 states that only one AFW train is required to be OPERABLE in MODE 4. The ITS does not contain the operability description "capable of providing flow to the steam generator(s) relied upon for heat removal" in the LCO Note. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by moving the details of what constitutes an OPERABLE train to the Bases.	Bases	ITS 5.5.10	1
ITS 3.7.5 CTS 3.7.1.2	LA.3	General Note	General Note of CTS 3.7.1.2 for the Surveillance Requirements requires the operator to establish and maintain constant communications between the control room and the auxiliary feed pump room while any normal AFW pump discharge valve is closed during surveillance testing. The ITS does not contain such a requirement. This changes the CTS by moving the General Note for establishing and maintaining constant communications between the control room and the auxiliary feed pump room while any normal AFW pump discharge valve is closed during surveillance testing to the Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.7.5 CTS 3.7.1.2	LA.4	Note (8)	Note (8) of CTS 3.7.1.2 specifies ACTION statement (a) must be followed when one steam supply is inoperable. Condition A of ITS 3.7.5 specifies a condition must be entered with one steam supply inoperable. This changes the CTS by moving the Note for following ACTION statement (a) to the Bases.	Bases	ITS 5.5.10	3
ITS 3.7.5 CTS 3.7.1.2	LA.5	4.7.1.2.7	CTS 4.7.1.2.7 requires the verification of AFW flow from WT-TK 10 (Unit 1) and TK-210 (Unit 2) (i.e., the PPDWST) to the steam generators with the AFW valves in their normal alignment. ITS SR 3.7.5.5 requires the verification of AFW flow from the PPDWST to each steam generator. The ITS does not contain a list or description of the PPDWST or the AFW valves that would satisfy the corresponding surveillance. This change is being made so that the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by moving specific details regarding performance of the SR (i.e., the PPDWST equipment ID numbers) to the Bases	Bases	ITS 5.5.10	1
ITS 3.7.5 CTS 3.7.1.2	LA.6	4.7.1.2.1, Note 4	CTS Note (4) of 4.7.1.2.1 requires the re-verification of requirements by a second and independent operator. ITS SR 3.7.5.1 does not contain such a requirement. This change is being made so the BVPS ITS is consistent as possible with NUREG-1431. This changes the CTS by moving the Note for the re-verification of requirements by a second and independent operator to the Bases.	Bases	ITS 5.5.10	3
ITS 3.7.6 CTS 3.7.1.3	LA.1	LCO, Action b	CTS 3.7.1.3 LCO defines the required water volume as "usable" and Action b states the reactor plant river water system (Unit 1) or the service water system (Unit 2) performs a function as a backup supply to the AFW pumps. The corresponding ITS 3.7.6 LCO simply requires the tank to be operable without describing the bases of the specified volume and ITS Required Action A.1 specifies the backup water supply to be Operable when the PPDWST is inoperable without describing the backup system in detail. The CTS is revised to be more consistent with the ITS. This changes the CTS by relocating specific design details (i.e., the specifics regarding the required water volume and the AFW system backup water supply) to the Bases.	Bases	ITS 5.5.10	1
ITS 3.7.13 CTS 3.7.1.4			<b>NONE</b>			

Table LA  
Removed Details  
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.7.2 CTS 3.7.1.5	LA.1	4.7.1.5	CTS 4.7.1.5 requires the verification of MSIV full closure within 5 seconds (Unit 1) and 6 seconds (Unit 2). ITS SR 3.7.2.1 requires the verification of isolation time of each MSIV is within limits. This changes the CTS by moving the specific response times to the Licensing Requirements Manual (LRM).	LRM	10CFR50.59	1
ITS 3.7.3 CTS NA			<b>NONE</b>			
ITS 3.7.7 CTS 3.7.3.1			<b>NONE</b>			
ITS 3.7.8 CTS 3.7.4.1			<b>NONE</b>			
ITS 3.7.9 CTS 3.7.5.1	LA.1	LCO	CTS 3.7.5.1 requires the ultimate heat sink OPERABLE with a minimum water level at or above elevation 654 Mean Sea Level, at the intake structure. ITS SR 3.7.9.1 requires the verification the water level of the UHS is $\geq$ 654 ft mean sea level. The ITS does not contain the procedural details of denoting where the SR is performed (at the intake structure). This changes the CTS by moving the procedural details of the UHS surveillance test to the Bases.	Bases	ITS 5.5.10	3
ITS 3.7.4 CTS NA			<b>NONE</b>			
ITS 3.7.11 CTS 3.7.6			<b>NONE</b>			

Table LA  
Removed Details  
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.7.10 CTS 3.7.7.1 (U1) & CTS 3.7.7 (U2)			NONE			
ITS 3.7.12 CTS 3.9.12	LA.1	4.9.12.1	CTS 3/4.9.12 requires the verification of the fuel building portion of the SLCRS by verifying fuel building exhaust flow discharging through at least one train of SLCRS HEPA filters and charcoal adsorbers. This requirement is verified at least once per 12 hours in accordance with CTS 4.9.12.1. ITS SR 3.7.12.1 requires at least once per 12 hours the verification that one SLCRS train is in operation. The ITS does not contain the procedural details of the fuel building exhaust flow path through the SLCRS during movement of recently irradiated fuel assemblies. This changes the CTS by moving the procedural details of the fuel building exhaust flow path to the Bases.	Bases	ITS 5.5.10	3
ITS 3.7.15 CTS 3.9.11			NONE			
ITS 3.7.14 CTS 3.9.14	LA.1	4.9.14.1	CTS 4.9.14.1 (Unit 1) provides surveillance details for verifying fuel receipt records for new fuel, or by burnup analysis and comparison with the associated Table(s) for spent fuel to ensure that the spent fuel pool assemblies are within limits. ISTS SR 3.7.17.1 (ITS SR 3.7.14.1) specifies the verification by "administrative means" the initial enrichment and burnup of the fuel assembly is in accordance with the specified Table(s). ISTS SR 3.7.17.1 (ITS SR 3.7.14.1) does not contain the details of the administrative verification. This changes the CTS by moving the procedural details of the administrative verification to the Bases.	Bases	ITS 5.5.10	3

Table LA  
Removed Details  
Section 3.7 - Plant Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.7.16 CTS 3.9.14 (U1) CTS 3.9.15 (U2)			NONE			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.1	LCO	CTS LCO 3.8.1.1.b.1 requires tanks for containing a minimum “usable” volume of fuel oil. CTS LCO 3.8.1.1.b.2 requires a separate fuel storage system containing a minimum “usable” volume for stored fuel oil. ITS SRs 3.8.1.4 and 3.8.3.1 contain the requirements for DG and stored fuel oil inventories. This changes the CTS by moving the word “usable” from the Specifications to the TS Bases for the specified ITS SRs.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.2	4.8.1.1.2.b.2	CTS SR 4.8.1.1.2.b.2 requires the verification of the diesel generator capability to reject a load. The load rejection values are 615 kW for Unit 1 and Unit 2 is 825 kW. ITS SR 3.8.1.8 contains the requirement to verify that a DG has the capability to reject its associated single largest post-accident load. This changes the CTS by moving the specific kW requirement for the load rejection from the Specifications to the TS Bases. The ISTS Bases for SR 3.8.1.8 has a bracketed sentence where the specified kW load(s) may be inserted.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.3	LCO	CTS LCO 3.8.1.1.b.2 states “Two separate and independent diesel generators.” ITS LCO 3.8.1 b states “Two diesel generators (DGs) capable of supplying the onsite Class 1E AC Electrical Power Distribution System.” This changes the CTS by moving the phrase “separate and independent” that describes the DGs from the Specification to the ITS Bases. This phrase “separate and independent diesel generators” is included in the ITS LCO Bases.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.4	4.8.1.1.2.a.7	CTS surveillance requirement 4.8.1.1.2.a.7 states verify the diesel generator is aligned to provide standby power to the associated emergency busses. ITS SRs do not require the verification of the DG to the associated bus. This changes the CTS by moving the TS requirement from the specification to ITS Bases in the Background section.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.5		Not used.			

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.6	SR Notes	CTS surveillance for both units 4.8.1.1.2.a.5 and 4.8.1.1.2.b.3.b), and for Unit 2 only, 4.8.1.1.2.f, have notes that modify the requirements. The notes 3 and 8 states that the values for voltage and frequency are analysis values. These value bands shall be appropriately modified (increased or decreased) to account for measurement uncertainties. ITS SRs that contain voltage and frequency limits do not specify that the numbers are analysis values or modified to account for measurement uncertainties. This changes the CTS by moving the CTS notes from the specification to ITS Bases in the appropriate SR section.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.7	4.8.1.1.2.b.2	CTS surveillance requirement 4.8.1.1.2.b.2 has a note that modify the requirement. The surveillance verified the generator capability to withstand a load rejection of a specific value without tripping or exceeding a specific frequency. The frequency limit is modified by note 7. The note states that the value for frequency is decreased to account for measurement uncertainties. ITS SR 3.8.1.8 requires the verification of each DG capability to reject a specific load without the frequency exceeding a specific frequency. This changes the CTS by moving the CTS note that states that the frequency is reduced to account for measurement uncertainties from the specification to ITS Bases in the appropriate SR section.	Bases	ITS 5.5.10	1
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.8	4.8.1.1.2.b.6	CTS surveillance requirement 4.8.1.1.2.b.6 states that every 18 months during shutdown each diesel will be verified that the auto-connected loads do not exceed the 2000 hour rating of the machine. ITS LCO 3.8.1 SRs do not include this requirement. This changes the CTS by moving the requirement from specification to the Licensing Requirements Manual (LRM).	LRM	10CFR 50.59	3
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.9		Not used.			
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.10	4.8.1.1.2.g	Unit 2 CTS surveillance requirement 4.8.1.1.2.g states at least once per 10 years each main fuel oil storage tank will be drained, the accumulated sediment will be removed, and the tank cleaned using a sodium hypochlorite solution or other appropriate cleaning solution. ITS SRs for 3.8.3 do not contain this requirement. This changes the CTS by moving the Unit 2 tank-cleaning requirement from the specification to the Licensing Requirements Manual (LRM).	LRM	10CFR 50.59	3

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.11	4.8.1.1.2.d and 4.8.1.1.2.e	CTS Actions Note 1 refers to CTS surveillance requirement 4.8.1.1.2.d and 4.8.1.1.2.e for the testing requirements for stored and new fuel oil, including the specific testing standards. This Note appears three times in the CTS as it is used for the different DG Actions. However, the corresponding ITS SR 3.8.3.3, that addresses fuel oil properties, requires new and stored fuel oil be tested and maintained within the limits of, and performed at a frequency in accordance with the Diesel Fuel Oil Testing Program. The ITS program in turn requires testing of diesel fuel oil in accordance with the applicable industry standards, but does not specify the same level of procedural detail for each required test as the CTS surveillances. As such, the applicable limits are retained in the ITS SR 3.8.3.3 Bases. This changes the CTS by moving the procedural details (limits, standards, and guidance) of diesel fuel oil testing to the Bases for ITS SR 3.8.3.3.	Bases	ITS 5.5.10	3
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.12	3.8.1.1.b.4 and b.5	Unit 2 CTS LCO 3.8.1.1.b.4 and b.5 require the lubricating oil storage system to contain a specified volume of lube oil and the capability to transfer lube oil from the storage to the DGs. Unit 2 CTS surveillance requirement 4.8.1.1.2.a.8 requires the verification that lubricating oil inventory in storage every 31 days. ITS LCO 3.8.3 states the stored diesel lube subsystem shall be within limits for each required DG. ITS SR 3.8.3.2 requires the verification of lubricating oil inventory is $\geq$ the specified volume every 31 days. This changes the Unit 2 CTS requirements by moving the requirement for the capability to transfer lube oil from the storage to the DGs from the specification to the ITS Bases.	Bases	ITS 5.5.10	3
ITS 3.8.1 ITS 3.8.3 CTS 3.8.1.1	LA.13	4.8.1.1.2.d and 4.8.1.1.2.e	CTS 4.8.1.1.2.d and 4.8.1.1.2.e contain procedural details (limits, standards, and guidance) for meeting the TS requirement related to diesel fuel oil testing. The corresponding ITS requirements are contained in ITS 5.5.9, Diesel Fuel Oil Testing Program. ITS SR 3.8.3.3 requires testing in accordance with the program. The ITS program in turn requires testing of diesel fuel oil in accordance with the applicable industry standards, but does not specify the same level of procedural detail for each required test as the CTS surveillances. This changes the CTS by moving the procedural details (limits, standards, and guidance) of diesel fuel oil testing to the Bases for ITS SR 3.8.3.3.	Bases	ITS 5.5.10	3
ITS 3.8.2 CTS 3.8.1.2			<b>NONE</b>			



Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	LA.1	LCO	CTS LCO 3.8.2.1 requires the electrical busses to energized with each of the 4160, 480, and 120 VAC buses specified. Each bus has a specific nomenclature. ITS LCO 3.8.9 states, "AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE." This changes the CTS by moving the specific names of the buses from the Specification to the ITS Bases for LCO 3.8.9 Table.	Bases	ITS 5.5.10	1
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	LA.2	LCO	CTS LCO 3.8.2.1 states the electrical busses shall be energized in the specified manner with tie breakers open between redundant busses within the unit. ITS LCO 3.8.7 states "The required Train A and Train B inverters shall be OPERABLE." ITS LCO 3.8.9 states, "AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE." This changes the CTS by replacing the requirement that the electrical busses are energized in a specific manner with tie breakers open between redundant buses with the requirement that the required buses are OPERABLE. The buses being energized in a specific manner with tie breakers opened is moved from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	LA.3	LCO	CTS LCO 3.8.2.1 states the electrical busses shall be energized in the specified manner with tie breakers open between redundant busses within the unit. Items c, d, e, and f require the four 120-volt AC Vital buses to be energized from its associated inverter which is connected to the associated DC bus. ITS LCO 3.8.7 states "The required Train A and Train B inverters shall be OPERABLE." ITS LCO 3.8.9 requires the Distribution Systems, including the AC Vital buses to be OPERABLE. This changes the CTS by moving the description of the AC Vital buses from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	LA.4	Action c	CTS LCO 3.8.2.1 Action c states, in part, that with one A.C. Vital Bus either not energized from its associated inverter, or with the inverter not connected to its associated D.C. Bus, re-energize the A.C. Vital Bus from its associated inverter connected to its associated D.C. Bus within 24 hours. ITS LCO 3.8.7 Action A states with one inverter inoperable, restore the inverter to OPERABLE status within 24 hours. This changes the CTS by describing the requirement for an inoperable inverter and moving the description of the AC Vital buses from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.7 ITS 3.8.9 CTS 3.8.2.1	LA.5	Action a	CTS LCO 3.8.2.1 Action a requires with one of the required trains of A.C. emergency busses not fully energized, re-energize the train 8 hours. Action b requires With one A.C. Vital Bus not energized, re-energize the A.C. Vital Bus within 2 hours. ITS LCO 3.8.9 Action A states with one or more AC electrical power distribution subsystem inoperable restore the AC distribution subsystem to OPERABLE status with 8 hours. Action B states with one or more AC vital buses inoperable, restore the AC vital bus to OPERABLE status within 2 hours. The ITS Bases describes the operability requirement as being energized. This changes the CTS by moving the operability description of the buses (i.e., energized) from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	LA.1	LCO	CTS LCO 3.8.2.2 requires the electrical busses to energized with each of the 4160, 480, and 120 VAC buses specified. Each bus has a specific nomenclature. ITS LCO 3.8.10 states, "The necessary portion of AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE." This changes the CTS by moving the specific names of the buses from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.8 ITS 3.8.10 CTS 3.8.2.2	LA.2	LCO	CTS LCO 3.8.2.2 states as a minimum, one of the following trains of A.C. Busses shall be OPERABLE and energized in the specified manner. Items A.3, A.4, B.3 and B.4 specify the required 120-volt AC Vital buses be energized from its associated inverter connected to the DC bus. CTS 3.8.2.2 Action specifies corrective action to restore the required busses to an energized state. ITS LCO 3.8.8 states "Two Inverters shall be OPERABLE." ITS LCO 3.8.10 specifies the required Distribution Systems, including the AC Vital buses are OPERABLE. This changes the CTS by moving the description of the AC Vital buses being "energized" from the Specification to the ITS Bases.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.1	LCO	CTS LCO 3.8.2.3 requires the DC electrical equipment and busses to be OPERABLE. Each train of DC is specified in terms in DC busses, battery banks, and chargers. CTS Surveillance requirement 4.8.2.3.1 requires each of the DC trains to be OPERABLE and energized. The CTS LCO includes a list of the specific busses and equipment required OPERABLE. ITS LCO 3.8.4 simply states "The Train A and Train B DC electrical power subsystems shall be OPERABLE." ITS LCO 3.8.9 requires the Train A and B DC busses to be OPERABLE. The corresponding ITS LCOs do not include the CTS details describing the required busses or equipment. The CTS is revised to conform to the ITS. This changes the CTS by moving the details describing each train (orange and purple bus) including the specific DC busses, battery banks, and chargers) from the CTS LCO to the ITS 3.8.4 and 3.8.9 Bases as applicable.	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.2	4.8.2.3.2.a.2	Unit 1 CTS surveillance requirement 4.8.2.3.2.a.2 states that each 125 volt battery bank and charger shall be demonstrated OPERABLE every 7 days with the battery on float charge the total battery terminal voltage is greater than or equal to 127.8 volts for 60 cell batteries 1-1 and 1-2 and 125.67 volts for 59 cell batteries 1-3 and 1-4. Unit 2 CTS surveillance requirement 4.8.2.3.2.a.2 requires that each 125-volt battery bank and charger shall be demonstrated OPERABLE every 7 days with the total battery terminal voltage greater than or equal to 127.8 volts on float charge. ITS SR 3.8.4.1 states "Verify battery terminal voltage is greater than or equal to the minimum established float voltage." The Frequency of the SR is every 7 days. This changes the CTS by moving the battery terminal voltage requirements from the specifications to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.3	4.8.2.3.1	CTS surveillance requirement 4.8.2.3.1 states that each D.C. bus train shall be determined OPERABLE and energized at least once per 7 days by verifying correct breaker alignment and indicated power availability. ITS SR 3.8.9.1 states "Verify correct breaker alignments and voltage to DC electrical power distribution subsystems." The Frequency of the SR is every 7 days. This changes the CTS by moving the term "energized" from the specification to the ITS Bases and changing the term "bus train" to the electrical power distribution subsystem.	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.4	4.8.2.3.2.c.4	CTS surveillance requirement 4.8.2.3.2.c.4 states "The battery charger will supply at least 100 amperes at 140-volts for at least 4 hours." ITS SR 3.8.4.2 in part requires the verification of each battery charger can provide $\geq 100$ amps at greater than or equal to the minimum established float voltage for $\geq 4$ hours. This changes the CTS by moving the voltage requirement from the specification to the ITS Bases and replacing the requirement with the term "minimum established float voltage."	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.5	4.8.2.3.2.d	CTS surveillance requirement 4.8.2.3.2.d states "At least once per 18 months, during shutdown, by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status all of the actual or simulated emergency loads for the 2-hour design duty cycle when the battery is subjected to a battery service test." ITS SR 3.8.4.3 requires verification of the battery capacity is adequate by supplying, and maintaining in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. The SR must be performed during shutdown and every 18 months. This changes the CTS by moving the requirement of the design duty cycle time and the emergency loads being actual or simulated from the specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.6	4.8.2.3.2.f	CTS surveillance requirement 4.8.2.3.2.f requires the performance of a discharge tests verifying battery capacity and to detect signs of degradation. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating. ITS SR 3.8.6.6 in part requires the verification of battery capacity when subjected to a performance discharge test. This changes the CTS by moving the definition of degradation from the specification to the ITS Bases.	Bases	ITS 5.5.10	3
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.7		Not used.			
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.8	4.8.2.3.2.b.3	CTS surveillance requirement 4.8.2.3.2.b.3 states the average electrolyte temperature of every tenth cell of connected cells is above 60 °F. ITS SR 3.8.6.4 states "Verify each battery pilot cell temperature is greater than or equal to minimum established design limits." This changes the CTS by moving the temperature requirement from the surveillance to the ITS Bases and stating the temperature requirement as "the minimum established design limits."	Bases	ITS 5.5.10	1

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.9	Table 3.8-1 Unnumbered note at bottom of page.	Unit 1 CTS Table 3.8 – 1 Note b states “Or battery charging current is less than (2) amps when on charge.” A notation to the bottom of the table states” Numbers in parentheses assume a manufacturer’s recommended full charge specific gravity of 1.215.” ITS LCO 3.8.6 does not contain this information. This changes the CTS by moving the manufacturer’s recommended full charge specific gravity from the specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.10	4.8.2.3.2.b.2, 4.8.2.3.2.c.1, 4.8.2.3.2.c.2, 4.8.2.3.2.c.3	CTS surveillance requirement 4.8.2.3.2.b.2 requires there is no visible corrosion at either terminals or connectors, or the connector resistance of these items is less and than 150 micro-ohms. CTS surveillance requirement 4.8.2.3.2.c.1 states that the cell, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration. CTS surveillance requirement 4.8.2.3.2.c.2 requires the cell-to-cell and terminal connections are clean, tight, and coated with anti-corrosion material. CTS surveillance requirement 4.8.2.3.2.c.3 states that the resistance of each cell-to-cell and terminal connection is less than or equal to 150 micro-ohms. ITS LCO 3.8.6 does not contain these surveillance requirements. This changes the CTS by moving these requirements from the specifications to the Licensing Requirements Manual (LRM).	LRM	10CFR50.59	3
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.11	4.8.2.3.2.b.1	CTS surveillance requirement 4.8.2.3.2.b.1 requires the parameters in Table 3.8–1 to meet the Category B limits. CTS in Table 3.8 – 1 lists the allowable value for electrolyte level as “above the top of plates.” ITS SR 3.8.6.3 states “Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.” The ITS Bases for Action Condition C discusses electrolyte level operability requirements. This changes the CTS by moving the details regarding electrolyte level from the specification to the ITS Bases.	Bases	ITS 5.5.10	1
ITS 3.8.4 ITS 3.8.6 ITS 3.8.9 CTS 3.8.2.3	LA.12	Table 3.8-1	CTS Table 3.8-1 lists the surveillance requirements for the battery. The Category A and Category B limits list electrolyte level with specify requirement. ITS SR 3.8.6.3 states the requirement for electrolyte level is greater than or equal to minimum established design limits. This changes the CTS by moving information from the specification to the Battery Monitoring and Maintenance Program implementing document.	Program	ITS 5.5.13	3

Table LA  
Removed Details  
Section 3.8 - Electrical Power Systems

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.8.5 ITS 3.8.10 CTS 3.8.2.4	LA.1	LCO	CTS LCO 3.8.2.4 requires the DC electrical equipment and busses to be OPERABLE and energized in a specific manner. Each train of DC is specified in terms of DC busses, battery banks, and chargers. CTS Surveillance requirement 4.8.2.4.1 requires the DC train to be OPERABLE and energized. Unit 2 CTS LCO 3.8.2.4 states that a spare charger may substitute for any inoperable charger or a charger removed from service for maintenance (* footnote). ITS LCO 3.8.5 states "One DC electrical power subsystem shall be OPERABLE." This changes the CTS by moving the OPERABILITY requirements for the train, buses, battery banks, and chargers (including the * footnote) from the specifications to the ITS Bases.	Bases	ITS 5.5.10	1

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.9.1 CTS 3.9.1	LA.1	LCO	CTS 3.9.1 states that the boron concentration in MODE 6 shall be the more restrictive of a $K_{eff}$ of 0.95 or a boron concentration of $\geq 2400$ ppm. ISTS LCO 3.9.1 states that the boron concentration shall be within the limit specified in the COLR. This changes the CTS by relocating the specific reactivity condition (boron concentration) for MODE 6 to the Core Operating Limits Report (COLR).	COLR	ITS 5.6.3	1
ITS 3.9.1 CTS 3.9.1	LA.2	4.9.1.2	CTS Surveillance 4.9.1.2 specifies the boron concentration of the refueling canal and RCS be verified by chemical analysis. The corresponding ISTS surveillance only specifies that the boron concentration be verified within the limit. The ISTS bases for the surveillance contains the additional detail. The CTS is being revised to conform to the ISTS. This changes the CTS by moving specific details (where and how to verify the boron concentration) out of the CTS surveillance and into the Bases discussion for the surveillance.	Bases	ITS 5.5.10	3
ITS 3.9.2 CTS 3.9.2	LA.1	LCO	CTS LCO 3.9.2 states that two source range neutron flux monitors (primary or alternate) shall be operating, each with continuous visual indication in the control room. The corresponding ISTS LCO states that two source range neutron flux monitors shall be OPERABLE. The CTS LCO is revised to conform to the ISTS LCO. The information describing the system functional requirements i.e., a primary or alternate monitor operating with continuous visual indication in the control room is moved to the TS bases.	Bases	ITS 5.5.10	1
ITS NA CTS 3.9.3	LA.1	3.9.3	CTS 3.9.3 contains requirements relating to the time limit applicable to the movement of irradiated fuel assemblies. CTS 3.9.3 requires that the reactor be subcritical for the specified time limit prior to moving irradiated fuel assemblies. The ISTS does not contain similar requirements. The CTS is revised to conform to the ISTS. This changes the CTS by removing this limit and the associated requirements for implementing it from the CTS. The CTS requirements are moved to the Licensing Requirements Manual (LRM).	LRM	10CFR50.59	1

Table LA  
Removed Details  
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.9.3 CTS 3.9.4	LA.1	3.9.4.c.1	CTS 3.9.4 LCO item c.1 requires penetrations to be closed by an isolation valve, blind flange, manual valve, or "approved functional equivalent". The corresponding ISTS LCO requirement specifies the penetration be closed by a manual or automatic isolation valve, blind flange, or "equivalent". In order to conform with the ISTS wording the CTS description of equivalent i.e., "approved functional" is being moved to the associated TS bases. This changes the CTS by moving out details related to meeting the TS requirements.	Bases	ITS 5.5.10	3
ITS 3.9.4 CTS 3.9.8.1	LA.1	Action b	CTS 3.9.8.1 Action b states that "the residual heat removal loop may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs. The corresponding requirement in the ISTS states that "the residual heat removal loop may be not in operation for ≤ 1 hour per 8 hour period...". The CTS is revised to conform to the ISTS. This changes the CTS by removing the procedural details describing what may be accomplished during the 1 hour exception to the Bases.	Bases	ITS 5.5.10	3
ITS 3.9.4 CTS 3.9.8.1	LA.2		Not used.			
ITS 3.9.4 CTS 3.9.8.1	LA.3	4.9.8.1	CTS 4.9.8.1 requires that the RHR loop be verified in operation and circulating reactor coolant. The corresponding ISTS surveillance only requires that the RHR loop be verified in operation. This changes the CTS by moving the descriptive detail of "circulating reactor coolant" from the CTS surveillance to the Bases.	Bases	ITS 5.5.10	2
ITS 3.9.4 CTS 3.9.8.1	LA.4		Not used.			
ITS 3.9.5 CTS 3.9.8.2			<b>NONE</b>			



Table LA  
Removed Details  
Section 3.9 - Refueling Operations

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 3.9.3 ITS 3.3.6 CTS 3.9.9	LA.1	4.9.9	(Unit 2 only) CTS surveillance 4.9.9 requires the containment purge and exhaust valve actuation on a high radiation signal and manual initiation be verified. The corresponding ITS SR 3.9.3.3 specifies that the containment purge and exhaust valve actuation be verified on an actual or simulated actuation signal. The CTS is revised to conform to the ISTS. This changes the CTS by removing the details of system design (specific actuation signals) from the surveillance requirement to the Bases.	Bases	ITS 5.5.10	1
ITS 3.9.6 CTS 3.9.10			<b>NONE</b>			

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 4.0 - Design Features

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 4.0 CTS 5.0	LA.1	5.2.2	CTS 5.2.2, "Control Rod Assemblies" is revised consistent with the ISTS. The more detailed CTS description of the control rods is replaced with the more simple ISTS description. The level of detail contained in the CTS regarding the precise length of each rod and the percent of each absorber material used in the rods, as well as the cladding material is removed from the CTS. This design information is moved to the UFSAR.	UFSAR	10CFR50.59	1

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms

Table LA  
Removed Details  
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 5.0 CTS 6.0	LA.1	6.2.1.a	CTS 6.2.1.a specifies that the correlation between positions described in these technical specifications and the plant-specific titles are documented in the Unit 1 or Unit 2, as applicable, UFSAR Table 13.1-2. The corresponding ITS 5.2.1.a does not include this detail. The CTS are revised to conform to the ISTS. This changes the CTS by moving the detail of the location of the correlation between Technical Specification positions and the plant specific titles to the Updated Final Safety Analysis Report (UFSAR).	UFSAR	10CFR50.59	3
ITS 5.0 CTS 6.0	LA.2	6.8.1.g	CTS 6.8.1.g requires that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. The ITS does not include these requirements. This changes the CTS by moving the requirements from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR).	UFSAR	10CFR50.59	4
ITS 5.0 CTS 6.0	LA.3	6.8.6.b	CTS 6.8.6.b provides requirements for the Radiological Environmental Monitoring Program. The ISTS do not include these requirements. The CTS are revised to conform to the ISTS. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM). In addition, the CTS is revised, upon relocation of these requirements, to replace the defined term "SITE BOUNDARY" with a non-defined term "site boundary" since this definition has been deleted from the TS.	ODCM	ITS 5.5.1	3
ITS 5.0 CTS 6.0	LA.4	6.9.5	CTS 6.9.5 provides requirements for the CORE OPERATING LIMITS REPORT (COLR) and includes references to topical reports used to prepare the COLR, including associated revision numbers and dates. ISTS 5.6.3 does not include this detail (i.e., topical report revision numbers and dates). The CTS are revised to conform to the ISTS. This changes the CTS by moving the topical report reference details to the COLR implementing document.	COLR	ITS 5.6.3	3
ITS 5.0 CTS 6.0	LA.5	6.9.6	CTS 6.9.6 provides requirements for the PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) and includes references to topical reports used to prepare the PTLR, including associated revision numbers and the specific purpose of the topical reports. ISTS 5.6.4 does not include this detail (i.e., topical report revision numbers and specific purpose). The CTS are revised to conform to the ISTS. This changes the CTS by moving the topical report reference details to the PTLR implementing document.	PTLR	ITS 5.6.4	3

Table LA  
Removed Details  
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 5.0 CTS 6.0	LA.6	6.11	CTS 6.11 provides requirements for the Radiation Protection Program. The ISTS do not include these requirements. The CTS are revised to conform to the ISTS. This changes the CTS by moving the requirements for the Radiation Protection Program to the Updated Final Safety Analysis Report (UFSAR).	UFSAR	10CFR50.59	3
ITS 5.0 CTS 6.0	LA.7	6.13	CTS 6.13 provides a change control process for the PROCESS CONTROL PROGRAM (PCP). The ITS does not include these requirements. This changes the CTS by moving the PCP requirements from the Technical Specifications to the Updated Final Safety Analysis Report (UFSAR). In addition, the CTS is revised, upon relocation of these requirements, to replace the word "OSC" with the word "PORC."	UFSAR	10CFR50.59	4
ITS 5.0 CTS 6.0	LA.8	6.14	CTS 6.14 provide procedural details for meeting the TS requirements related to changes to the ODCM (specifically record retention and review and acceptance responsibility of the OSC). ITS 5.5.1, Offsite Dose Calculation Manual (ODCM), provides requirements for changes to the ODCM, but does not include the procedural details for record retention and change review and acceptance responsibility of the OSC. This changes the CTS by moving these procedural details to the ODCM. In addition, the CTS is revised, upon relocation of these requirements, to replace the word "OSC" with the word "PORC."	ODCM	ITS 5.5.1	3
ITS 5.0 CTS 6.0	LA.9	4.0.5	CTS 4.0.5 provides requirements for the Inservice Inspection Program. The ITS does not include Inservice Inspection requirements. This changes the CTS by moving these requirements from the Technical Specifications to the Inservice Inspection Program.	ISI Program	10CFR50.55a	4
ITS 5.0 CTS 6.0	LA.10	4.6.1.3.a.1	CTS 4.6.1.3.a.1 provides procedural details for meeting the TS requirement to verify air lock door seal leakage meets the required acceptance criteria (i.e., the time period for maintaining the door seal gap pressurized). ITS 3.6.2, Containment Air Locks, and ITS 5.5.12, Containment Leakage Rate Test Program (CLRTP), require testing of the containment air lock door seals, but do not specify the detail of the time period for maintaining the door seal gap pressurized. This changes the CTS by moving procedural details of verifying that containment air lock door seal leakage meets the required acceptance criteria to the CLRTP implementing document.	CLRTP	ITS 5.5.12	3

Table LA  
Removed Details  
Section 5.0 - Administrative Controls

ITS # CTS #	DOC #	CTS Requirement	Description of Change	Location	Change Control	Type*
ITS 5.0 CTS 6.0	LA.11	U1 4.7.7.1.c.2, 4.7.8.1.b.1, 4.7.8.1.b.2, 4.7.8.1.b.3, 4.7.8.1.d, and U2 CTS 4.7.7.1.d, 4.7.8.1.b.1, 4.7.8.1.b.2, 4.7.8.1.b.3, 4.7.8.1.d	Unit 1 CTS 4.7.7.1.c.2, 4.7.8.1.b.1, 4.7.8.1.b.2, 4.7.8.1.b.3, and 4.7.8.1.d, and Unit 2 CTS 4.7.7.1.d, 4.7.8.1.b.1, 4.7.8.1.b.2, 4.7.8.1.b.3, and 4.7.8.1.d provide procedural details for meeting the TS requirement related to ventilation filter testing of the Control Room Emergency Ventilation System and the Supplemental Leak Collection and Release System. ITS 5.5.7, Ventilation Filter Testing Program, requires testing of the Control Room Emergency Ventilation System and the Supplemental Leak Collection and Release System ventilation filters, but do not specify the procedural details of the testing. This changes the CTS by moving procedural details of verifying ventilation filter testing meets the required acceptance criteria to the Ventilation Filter Testing Program implementing document.	VFTP	ITS 5.5.7	3

\* Change Types:

- 1 - Removing Details of System Design and System Description, Including Design Limits
- 2 - Removing Descriptions of System Operation
- 3 - Removing Procedural Details for Meeting Tech Spec Requirements and Related Reporting Requirements
- 4 - Removing Administrative Requirements Redundant to Regulations
- 5 - Removing Performance Requirements for Indication-only Instruments and Alarms